



Partnership for South Hampshire

**Part 1: Green Belt / Green
Infrastructure Designation
Study**
Policy Options Review

Final Report
Prepared by LUC
May 2022



Partnership for South Hampshire

Green Belt / Green Infrastructure Designation Study Policy Options Review

Version	Status	Prepared	Checked	Approved	Date
1.	Draft Report for FTB Chambers Review	J. Allen L. Wallwork D. Hope R. Swann S. Young	S. Young	S. Young	17.03.2022
2.	Draft Report for PfSH	J. Allen	J. Allen S. Young	S. Young	18.03.2022
3.	Final Draft Report for PfSH	J. Allen L. Wallwork D. Hope R. Swann S. Young	J. Allen S. Young	S. Young	24.05.2022
4.	Final Report for PfSH	J. Allen L. Wallwork D. Hope R. Swann S. Young	J. Allen S. Young	S. Young	27.05.2022
5.	Final Report for PfSH with preface added and minor updates	D. Hope J. Allen S. Young	S. Young	S. Young	19.07.2023

This report was completed in May 2022. Its contents reflect the policy context at that time, but its findings remain valid at the time of publication.

Bristol
Cardiff
Edinburgh
Glasgow
London
Manchester

landuse.co.uk

Land Use Consultants Ltd
Registered in England
Registered number 2549296
Registered office:
250 Waterloo Road
London SE1 8RD

100% recycled paper

Landscape Design
Strategic Planning & Assessment
Development Planning
Urban Design & Masterplanning
Environmental Impact Assessment
Landscape Planning & Assessment
Landscape Management
Ecology
Historic Environment
GIS & Visualisation



Contents

Chapter 1		Green infrastructure context	28
Executive Summary	2	Future opportunities for green infrastructure designation and conservation	33
Introduction	2		
Green Belt	3		
Green infrastructure opportunity areas	5		
Landscape designations	6		
Areas of separation	6		
Country parks	7		
Regional parks	8		
Conclusions	8		
<hr/>			
Chapter 2		Chapter 5	
Introduction	10	South Hampshire's Settlement Gaps	41
Partnership for South Hampshire Joint Strategy	11	Definitions of key terms	41
Aspiration for a South Hampshire Green Belt	12	Policy context	41
Summary of PfSH ambitions	12	Context	42
Report aims	13	Key settlement gaps	43
Report authors	13		
Report structure	13		
<hr/>			
Chapter 3		Chapter 6	
Potential Green Belt Performance of South Hampshire's Countryside	14	South Hampshire's Landscape Character	44
Relevant national Green Belt policy and case law	14	Definitions of key terms	44
Assessment area	15	International, national and local policy context	45
The potential function of a South Hampshire Green Belt	16	Landscape context	47
Key considerations when assessing Green Belt performance	19	Key areas of landscape value	49
Key factors in South Hampshire influencing the potential performance of a new Green Belt	20	Future opportunities for landscape designation and conservation	53
Likely strategic contribution of a South Hampshire Green Belt to the national Green Belt purposes	22		
<hr/>			
Chapter 4		Chapter 7	
South Hampshire's Green Infrastructure	25	Policy Options Review	57
Definitions of key terms	25	Green Belt	58
National policy context	26	Designate areas of separation	64
Regional and local policy context	27	Green infrastructure opportunity areas	65
		Landscape designations	68
		Country parks	70
		Regional parks	71
		Timescales for designating and adopting the policy options	74
		Future national policy	75
		Conclusions	76
<hr/>			
		Appendix A	
		Legal Advice	A-1

Chapter 1

Executive Summary

Introduction

1.1 LUC was commissioned by the Partnership for South Hampshire¹ (PfSH) to explore what planning policy mechanisms the South Hampshire authorities could use to protect and enhance their open countryside.

1.2 This Part 1 report sets out the PfSH authorities' ambitions for the open countryside before exploring the different policy options available to achieve them. It forms the first Part of a two Part process. Part 1 was completed in May 2022 and its contents reflect the policy context and ambitions of PfSH at that time. Part 2 would involve gathering the necessary detailed evidence to support the chosen policy approach.

1.3 The contents of the PfSH Green Belt and green infrastructure designation study brief and latest PfSH Statement of Common Ground² have been reviewed to define the following policy ambitions for the protection of the countryside in South Hampshire:

- To focus development within South Hampshire's existing major urban areas first.
- To ensure that the setting of settlements with distinct identities are protected by appropriate countryside gaps.
- To protect and enhance South Hampshire's most valued landscapes³.
- To protect and enhance South Hampshire's green infrastructure network, delivering biodiversity net gains, protecting and connecting communities and the countryside, restoring the Nature Recovery Network⁴ and building resilience to the effects of climate change⁵.
- To co-ordinate a strategic approach to addressing the impact of development on the sub-region's sensitive ecological assets and functionally linked land⁶,

¹ PfSH is a partnership of eleven local planning authorities in South Hampshire comprising the unitary authorities of Portsmouth and Southampton; the district authorities of Eastleigh, East Hampshire, Fareham, Gosport, Havant, Test Valley, New Forest and Winchester; New Forest National Park Authority and Hampshire County Council.
² Partnership for South Hampshire – Statement of Common Ground, October 2021

³ Undesignated or designated, given the PfSH authorities have different approaches to protecting valued landscapes.

⁴ Hampshire and Isle of Wight Nature Partnership and Wildlife Trusts Nature Recovery Networks

⁵ Environment Act, UK Government, 2021

⁶ Directive 2009/147/EC of the Conservation of Wild Birds

particularly the international designations in the Solent⁷ and New Forest⁸.

1.4 South Hampshire’s open countryside is worth protecting; it has many landscape qualities and sensitivities in need of protection and enhancement. Delivering the necessary policy mechanisms and designations to effectively enhance all the landscape qualities of South Hampshire will take effort, time and financial resources. The policy options considered in this study are summarised in **Figure 1.1** below.

Figure 1.1: Policy Options



1.5 The following section summarises the key findings of the Study with regard to each of the policy options.

Green Belt

1.6 As set out in the National Planning Policy Framework (NPPF) the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence. Current planning guidance makes it clear that the Green Belt is a strategic planning policy constraint designed primarily to prevent the spread of built development and the coalescence of urban areas.

Green Belt policy strengths

1.7 The strengths of Green Belt policy are:

- Green Belt policy holds national significance and is generally supported by the general public and their political representatives, including in South Hampshire.
- Green Belt is a relatively simple designation to enforce and which has been largely effective at preventing development in Green Belt areas to date.
- There are areas of land in South Hampshire that would contribute to the Green Belt purposes (as defined in the NPPF) to a significant degree. For example Green Belt could help to prevent sprawl, maintain gaps between key settlements and prevent encroachment on the countryside. It could also help to preserve the setting and special character in the Test Valley west and south west of Romsey and Portsdown Hill north of Portsmouth.

Green Belt policy weaknesses

1.8 The weaknesses of Green Belt policy are:

- No new Green Belts have been designated in England in decades. Solving the housing crisis through the delivery of new homes has been a priority for successive national and local government over this period, which is why the bar for justifying new Green Belts set out in the NPPF is so high.
- National Green Belt policy is focussed on preventing development, making it harder for South Hampshire to sustainably deliver the growth it needs in the long term – a challenge already made complex by the broad range of significant environmental constraints in the area.
- Once established, Green Belts are not invulnerable to inappropriate development or alterations to their boundaries to accommodate growth. The NPPF sets out

⁷ Bird Aware Solent Strategy, Bird Aware Solent, December 2017

⁸ Recreational Use of the New Forest Protected Habitats Study, Footprint Ecology, April 2020

‘very special’ and ‘exceptional’ circumstances for development within Green Belts and Green Belt release, respectively. Therefore, the designation of a new Green Belt in South Hampshire would not prevent all development in the open countryside.

- National Green Belt policy is often misinterpreted to be a landscape, greenfield and/or green infrastructure protection designation rather than the simple spatial planning policy which it is. There are arguably more effective means of protecting and managing these other important environmental issues than Green Belt policy. For example, the NPPF does require local planning authorities to set out measures to enhance the beneficial uses of established Green Belt land, but the bar to demonstrate this is relatively low compared to other more environmentally-focussed planning issues, such as the need to demonstrate biodiversity net gain. Arguably there are more proactive and effective means of simultaneously protecting and enhancing the multiple functions of the open countryside.
- In the absence of a statutory Joint Plan covering South Hampshire, each LPA would need to designate new Green Belt land separately through their respective Local Plans, requiring considerable time and coordination to achieve. Landowners and developers would likely challenge the designation at each Local Plan examination.

Creating and justifying a new Green Belt

1.9 NPPF paragraph 139 emphasises that ‘the general extent of Green Belts across the country is already established’ and ‘new Green Belts should only be established in exceptional circumstances, for example when planning for larger scale development such as new settlements or major urban extensions’. The NPPF also states that when proposing new Green Belt, local planning authorities must through strategic policy:

- demonstrate why alternative policies would not be adequate;
- set out the major change in circumstances to make the designation necessary;
- communicate the consequences for sustainable development; and,
- highlight the consistency of the new designation with neighbouring plan areas and the other objectives of the NPPF.

1.10 A fundamental characteristic of Green Belt is that it should be permanent. The designation of a new Green Belt in South Hampshire could only be pursued effectively once the

PfSH authorities have agreed to and robustly evidenced how they plan to accommodate the growth needs of the sub-region over the next 30 years, i.e. at least two plan periods of growth. Only then will it be possible to answer the necessary policy tests for justifying a new Green Belt set out in national planning policy in full. **Table 1.1** summarises the main tests and the study's preliminary findings on each.

Table 1.1: Preliminary answers to NPPF tests for justifying new Green Belt

Key NPPF Tests	Initial Green Belt Findings
Demonstrate why alternative policies would not be adequate.	Our preliminary analysis suggests that there are alternatives to Green Belt that would deliver PfSH's policy ambitions at this stage.
Set out the major change in circumstances to make the designation necessary.	The substantial growth South Hampshire has received over the last 60 years is not unique in England. It is therefore not enough in isolation to potentially justify a Green Belt. Other unique circumstances would need to be found.
Communicate the consequences for sustainable development.	The PfSH assessment of Strategic Development Opportunity Areas (SDOAs) and associated Sustainability Appraisal work, as well as the local plan evidence bases of PfSH's constituent local planning authorities will be key to demonstrating this.
Highlight the consistency of the new designation with neighbouring plan areas.	A new Green Belt has the potential to have cross-boundary implications beyond the PfSH authorities' boundaries. Separate discussions and statements of common ground with neighbouring authorities will be required.

1.11 The absence of a forthcoming statutory Joint Plan covering the entirety of the PfSH area is an added complexity that comes with its own significant challenges and risks. In the event robust and convincing answers to the NPPF's exceptional circumstances tests for a new Green Belt can be found, each constituent authority containing land proposed for designation as Green Belt would need to present them at their own Local Plan examinations. The failure of just one Local Plan to be adopted would at best significantly delay the

delivery of a new Green Belt across South Hampshire and at worst undermine the whole exceptional circumstances case, preventing the delivery of the designation.

1.12 Finally, the approval of a new Green Belt now, decades after the designation of the last Green Belt, and after years of sustained housing under provision is likely to be politically controversial at the national level. It could catalyse a nationwide bid for Green Belt expansion, so even if a strong exceptional circumstances case could be made there is no guarantee it would be approved by the Secretary of State for Levelling Up, Housing and Communities.

Green infrastructure opportunity areas

1.13 Green infrastructure, as defined by PfSH is a multi-functional network of green and blue spaces, urban and rural, that is capable of delivering a wide range of environmental and quality of life benefits for local communities. Now more than ever, people and public bodies are recognising the value of the Green Infrastructure network which surround us. The 25 Year Environment Plan (25YEP), published in 2018, outlines the Government's support for habitat creation and connection to support nature's recovery and to restore losses.

1.14 The Environment Act 2021 places the ambitions of the 25YEP on a statutory footing, by creating a new governance framework for the environment. The Act sets legally binding targets for the recovery of the natural world in four priority areas: air quality, biodiversity, water and waste. It includes an important new target to reverse the decline in species abundance by the end of 2030.

1.15 GI policies and designations vary significantly in scope and detail, from broad strategies and the identification of GI opportunity areas to standards for new development or specific detailed initiatives with clear budgets and deliverables.

Green infrastructure policy strengths

1.16 The strengths of green infrastructure policies are:

- GI policies are easier to define and justify.
- GI has multiple functions, so policies that maintain, connect and enhance GI have greater scope to deliver multiple enhancements in the open countryside.
- GI covers the majority of the open countryside offering scope for a greater geographical coverage of protection and management.

GI policy weaknesses

1.17 The weaknesses of green infrastructure policies are:

- GI policies can be more strategic and general, giving rise to greater risks that their aspirations will not be delivered consistently and comprehensively across South Hampshire – significant long term funding streams would be required.
- It may be harder to justify what land should be designated for GI protection and enhancement and may be challenged by landowners/ developers.
- GI policies focus on the protection, improved connection and enhancement of the GI network. They would likely not prohibit development in the open countryside if such development could demonstrate it was compatible and could deliver new improvements and associated benefits.
- There is ongoing policy uncertainty around how the Nature Recovery Network will be delivered and what protection will be offered to areas designated for protection or enhancements.

Creating and justifying a new area-based green infrastructure policy

1.18 There are no specific national planning policy tests that need to be met in order to create and justify the designation of local GI. Local planning authorities have the freedom to designate GI as they please, as long as such designations do not conflict with the NPPF's goal to deliver sustainable development. In the absence of any formal guidance and secondary legislation for the designation or conservation of GI, the PfSH authorities could pursue:

- Identifying areas for GI protection and/or enhancement.
- Identifying standards for new development to comply with for example, requiring adherence to 'Building with Nature Standards',⁹ and/or setting a requirement for biodiversity net gain (BNG) – this could go above the future national requirement of 10% (if clear justification is provided for going above the legal requirement).
- Providing policy support for projects, for example for increasing canopy cover throughout urban areas and beyond, or named infrastructure projects required to support growth.

1.19 Funding could be made available through developer contributions towards open space and biodiversity net gain (where these cannot be provided on site), from environmental land management scheme funds, nature / health and

⁹ <https://www.buildingwithnature.org.uk/>

wellbeing grants (for example from the Heritage Lottery), nutrient neutrality funding and / or nature-based organisations own budgets.

1.20 It is important to secure the improvements made in the long term, through mechanisms such as land purchase or conservation covenants (should these be legislated for). Maintenance funding is also key, and contributions should provide for this, for example through bonds or other mechanisms. Uses which generate ongoing maintenance funding and which align with the policy ambitions in each area should also be promoted.

Landscape designations

1.21 Landscape designations focus on the protection of recognised landscape qualities and sensitives supported by evidence. They go a step further than the common strategy to prohibit development in the open countryside by defining specific areas of sensitivity and spelling out measures to ensure their conservation and enhancement. This could include the designation of local landscape designations.

Landscape designation strengths

1.22 The strengths of landscape designations are:

- Landscape policies are easier to define and justify.
- Landscape policies could cover large areas of South Hampshire's open countryside, including sensitive gaps between settlements.

Landscape designation weaknesses

1.23 The weaknesses of landscape designations are:

- Landscape policies are primarily protectionist policies, they do not always conserve and enhance the other values of open countryside, such as their ecological assets or their openness if openness is not considered important to character.
- Landscape policies are focussed on protecting specific landscape qualities, so areas of South Hampshire's open countryside not recognised for its landscape value could remain unprotected.
- Local landscape policies would likely not prohibit development in the open countryside if such development could demonstrate minimal impacts on its identified landscape qualities.

Creating and justifying a new landscape policy

1.24 There are no specific national planning policy tests that need to be met in order to create and justify the designation of local landscape. Local planning authorities have the freedom

to designate landscapes as they please, as long as such designations do not conflict with the NPPF's goal to deliver sustainable development.

1.25 Consideration could therefore be given to consolidating landscape areas in need of protection under a single strategic Joint Strategy policy to be reinforced and expanded upon as appropriate in each constituent authorities' emerging local plan.

Areas of separation

1.26 Areas of separation designations focus on the protection of recognised strategic and fragile gaps between neighbouring settlements, both to protect the individual settlements' identities and/or the open countryside that lies between them.

Areas of separation strengths

1.27 The strengths of areas of separation are:

- Separation policies are easier to define and justify.
- Areas of separation are relatively simple designations, which are easy for the general public and developers to understand and planners to implement, as long as the protected characteristics of each defined gap are clearly communicated in policy.

Areas of separation weaknesses

1.28 The weaknesses of areas of separation are:

- Areas of separation policies are primarily protectionist policies designed to limit growth in strategic and fragile gaps between neighbouring settlements, they are not focussed on the conservation and enhancement of the other benefits of open countryside, such as their landscape and ecological assets.
- Areas of separation policies are focussed on protecting specific areas of open countryside in between neighbouring settlements, so large areas of South Hampshire's open countryside that do not fall within strategic and/or fragile gaps between settlements would remain unprotected from encroachment by such policies (if this policy approach was adopted in isolation).

Creating and justifying new areas of separation

1.29 There are no specific national planning policy tests that need to be met in order to create and justify the designation of new local areas of separation or countryside gaps. Local planning authorities have the freedom to designate such areas as they please, as long as such designations do not conflict with the NPPF's goal to deliver sustainable development.

1.30 Consideration could therefore be given to consolidating all existing areas of separation, settlement gap and countryside gap policies in the PFSH authorities adopted local plans under a single strategic Joint Strategy policy to be reinforced and expanded upon as appropriate in each constituent authorities' emerging local plan. As part of this consolidation process, consideration could be given to designating new or expanding some of the existing areas of separation.

Country parks

1.31 Country parks are areas for people to visit and enjoy recreation in a countryside environment. Country parks were developed as a concept during the 1960s. They were designated to redirect an increasingly mobile population away from sensitive national parks, forests and agricultural land and to give urban populations easy access to the benefits of the countryside close to where they live.

Country park strengths

1.32 The strengths of country parks are:

- Parks defined and managed through local planning policy will be easier to define and justify.
- Parks are in active use and require proactive management, which is likely to deliver multiple benefits in the long term.

Country park weaknesses

1.33 The weaknesses of country parks are:

- Parks cover discrete areas of South Hampshire and would therefore not protect all greenfield land from development, including all sensitive settlement gaps, landscapes, ecological assets and functionally linked land.
- Securing the land and finding the funds to meet the Natural England accreditation requirements would be a significant financial undertaking.

Creating and justifying new country parks

1.34 There is no legal framework for the provision of country parks in England. The Public Health Act of 1875 enabled the purchase and maintenance of land to be used for public access, which was later transferred to the relevant Council's management with the Open Spaces Act of 1906. However, there remains no statutory requirement for local authorities to provide public parks, with the responsibility falling to the

planning system to assess current provision and sets quantitative and qualitative standards for parks.

1.35 Most of the UK's country parks are owned and managed by local authorities and many were designated in the 1970s by the then Countryside Commission on disused collieries, old railway lines, stately homes, under the Countryside Act¹⁰. The Countryside Act gives local authorities the power to create, extend, maintain and manage country parks on any site in the countryside appearing to them suitable or adaptable for the purpose, either on land under the ownership of the local authority or on other land where agreement has been secured from the land owner. Local authorities have the power to compulsorily purchase land for use as country parks.

1.36 More recently country parks have been created under a less formal arrangement and Natural England is working with partners to encourage accreditation of such parks¹¹.

Accredited parks must be:

- at least 10 hectares in size;
- defined by a clear boundary – marked on a map, whether it's open or fenced in;
- accessible – less than 10 miles from a residential area;
- free to enter;
- inclusive and accessible – show how they've met equality and disability needs and provided for varied groups;
- predominantly natural or semi-natural landscape, for example woodland, grassland, wetland, heathland or parkland, with no more than 5% of the area built upon (excluding car parks);
- signposted and easy to navigate – showing visitors where they can go, what they can do and direct them along footpaths, bridleways and cycle routes;
- visibly staffed, for example litter collection and maintenance;
- available for public or educational events;
- near public toilets – either on-site or a 2 minute walk away; and
- informed by the local community – the public should have some influence over the management and development of your site.

1.37 Securing the land and meeting all these requirements would be a significant undertaking.

¹⁰ Countryside Act (1968):
<https://www.legislation.gov.uk/ukpga/1968/41>

¹¹ Natural England Guidance on country park accreditation:
<https://www.gov.uk/guidance/get-accreditation-for-your-country-park>

Regional parks

1.38 Regional parks are larger than country parks often serving a population greater than a single authority area, and often extending across multiple local authority boundaries. Regional parks provide a more integrated, landscape-scale policy intervention than country parks, generally serving more needs on a more ambitious scale – i.e. in relation to recreation, landscape, nature recovery and climate change adaptation .

1.39 There are a few examples of regional parks across England and there is growing policy engagement, most notably in London¹².

1.40 The London Plan contains a public open space categorisation which defines London's regional parks as 'large areas, corridors or networks of open space, the majority of which will be publicly accessible and provide a range of facilities and features offering recreational, ecological, landscape, cultural or green infrastructure benefits'. The London Plan park size guidelines define regional parks as 400ha or more and recommended that they be readily accessible by public transport and managed to meet best practice quality standards.

Regional park strengths

1.41 The strengths of regional parks are:

- Regional parks provide a flexible mechanism through which to proactively deliver GI benefits, recreation and access provision and landscape enhancement addressing several PfSH policy ambitions together.
- Parks are in active use and require proactive management, which is likely to deliver multiple benefits in the long term.
- Regional parks can be flexible enough to include existing settlements and new development as well as open countryside facilitating both countryside enhancements and acceptable levels of appropriate development.

Regional park weaknesses

1.42 The weaknesses of regional parks are:

- A regional park would cover a discrete area of South Hampshire and would therefore not protect all greenfield land from development, including all sensitive settlement gaps, landscapes, ecological assets and functionally linked land.

- Although a regional park would likely prohibit most forms of development, they would likely not prohibit development in the open countryside if such development could demonstrate it would facilitate or improve park facilities and services.
- Securing the land and finding the funds to deliver a regional park would be a significant financial undertaking.

Creating and justifying new regional parks

1.43 There is no legal framework for the provision of regional parks in England. The Public Health Act of 1875 enabled the purchase and maintenance of land to be used for public access, which was later transferred to the relevant Council's management with the Open Spaces Act of 1906. However, there remains no statutory requirement for local authorities to provide public parks, with the responsibility falling to the planning system to assess current provision and sets quantitative and qualitative standards for parks.

1.44 There are three broad types of regional park that have been created:

- Regional parks with a statutory basis.
- Regional parks which hold status within the planning system.
- Regional parks formed as part of a county or sub-regional partnership.

Conclusions

1.45 No single designation or policy solution is likely to deliver both the level of protection and desired enhancement required to deliver all of PfSH's policy ambitions. Designations that focus on prohibiting development, like Green Belt are arguably less likely to be successful in achieving PfSH's ambitions than more proactive and positive policies, like regional parks and green infrastructure networks, designed to improve the multiple benefits and functions of the countryside, especially as the latter also create more reasons for prohibiting development in the long term.

1.46 Due to the current uncertainties regarding the scale and location of future growth within South Hampshire and the absence of a forthcoming statutory Joint Plan covering the PfSH area and the associated complexities of trying to deliver a Green Belt through 10 Local Plan processes, it is recommended that the PfSH authorities pursue the scope and

¹² Mayor of London, London Plan, 2021: <https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/london-plan-2021>

extent of an alternative mixture of sub-regional designations at the current time

1.47 This combined approach could help to ensure the delivery of a wider range of the PfSH ambitions. Together, depending on the extent of the policy designations, these policy mechanisms could also contribute significantly to all five of the national Green Belt purposes (as defined in the NPPF) by:

- Checking the unrestricted sprawl of the vast majority South Hampshire large built-up area (Green Belt Purpose 1) – particularly if a Regional Park was designated to the north of the M27.
- Preventing neighbouring towns merging into one another (Green Belt purpose 2) – through a strong areas of separation policy.
- Assisting in safeguarding the countryside from encroachment (Green Belt Purpose 3) – particularly through an extensive GI or Regional Park designation.
- Preserving the setting and special character of historic towns (Green Belt Purpose 4) – by including the areas of importance to the setting of Portsmouth and Romsey in a designation.
- Assisting in urban regeneration, by encouraging the recycling of derelict and other urban land (Green Belt Purpose 5).

1.48 A carefully defined, combined policy approach could create an exciting opportunity to protect South Hampshire's most valued landscapes and GI opportunity areas from future development whilst also providing access to greenspace and recreation close to urban populations. The designations could also provide a gateway to the national parks and AONBs and a pressure valve for European ecological designations, conserving, enhancing and building the resilience of these local and regional assets in the face of South Hampshire's growth needs and climate change.

Chapter 2

Introduction

2.1 LUC was commissioned by the Partnership for South Hampshire (PFSH) to explore what planning policy mechanisms the South Hampshire authorities could use to protect and enhance their open countryside.

2.2 This Part 1 report sets out the PFSH authorities' ambitions and priorities before exploring the different policy options available to achieve them.

2.3 One option that has been proposed within South Hampshire is the creation of a new Green Belt. Paragraph 139 of the National Planning Policy Framework (NPPF) states Green Belts should only be established in exceptional circumstances, for example where planning for larger scale development such as new settlements or major urban extensions. In proposing new Green Belt, local planning authorities must:

- demonstrate why normal planning and development management policies would not be adequate;
- set out whether any major changes in circumstances have made the adoption of this exceptional measure necessary;
- show what the consequences of the proposal would be for sustainable development;
- demonstrate the necessity for the Green Belt and its consistency with strategic policies for adjoining areas; and,
- show how the Green Belt would meet the other objectives of the Framework.

2.4 This report will be used by the PFSH authorities to help decide whether to pursue the designation of new Green Belt, or an alternative policy mechanism or mechanisms, including:

- Area of Separation policies.
- Green infrastructure policies.
- Designated landscapes.
- Regional parks.
- Country parks.

2.5 This report represents the first Part of a two Part process. Part 1 was completed in May 2022 and its contents reflect the policy context and ambitions of PfSH at that time. Part 2 would involve gathering the necessary detailed evidence to support the chosen policy approach.

Partnership for South Hampshire Joint Strategy

2.6 PfSH is a partnership of eleven local planning authorities in South Hampshire comprising the unitary authorities of Portsmouth and Southampton; the district authorities of Eastleigh, East Hampshire, Fareham, Gosport, Havant, Test Valley, New Forest and Winchester; New Forest National Park Authority and Hampshire County Council.

2.7 The PfSH authorities' latest Statement of Common Ground¹³ commits to the commissioning of a series of evidence bases to inform the production of a PfSH Joint Strategy.

2.8 The Joint Strategy will be a non-statutory high-level strategic plan that will inform the relevant local plans and assist the local planning authorities in meeting the Duty to Cooperate.

2.9 PfSH has agreed a programme of work leading to a new Joint Strategy. The three ongoing workstreams are:

- Strategic Development Opportunity Area (SDOA) assessments (including traffic modelling and transport impact assessments for the SDOAs). This is seeking to identify the most suitable locations for strategic housing growth within the PfSH area.
- Joint Strategy Strategic Environmental Assessment, Sustainability Appraisal, Habitats Regulations Assessment and Appropriate Assessment.
- Green Infrastructure Needs and Consideration of Mechanisms on how to achieve Green Belt Designation. This is the focus of this report.

2.10 The Joint Strategy will aim to address South Hampshire's housing and green infrastructure needs up to 2036. However, given the lead in times for larger sites, it is likely that allocated sites will continue to deliver new development well beyond 2036. The Joint Strategy will

therefore provide an overall vision and strategic direction for new development up to 2050.

Potential scale of future growth

2.11 The latest PfSH Statement of Common Ground¹⁴ sets out the objectively assessed housing needs of the constituent local planning authorities. Each authority's housing needs have been calculated using the standard methodology required by Government policy for the period 2021-2036.

Table 2.1 sets out the housing figures based on the best figures available at this time.

Table 2.1: PfSH local authorities' housing needs 2021-2036¹⁵

Local Authority	Standard Method 2021-2036 (dpa)	Total requirement 2021-2036
East Hants (part)	107	1,605
Eastleigh	675	10,125
Fareham	541	8,115
Gosport	328	4,920
Havant	507	7,605
New Forest ¹⁶	993	14,895
Portsmouth	872	13,080
Southampton ¹⁷	1,389	20,835
Test Valley (part) ¹⁸	180	2,700
Winchester (part)	226	3,390
Total	5,818	87,270

2.12 Figures for districts that only partly fall within PfSH have been apportioned on the basis of the population of those wards that fall within PfSH, other than Test Valley as referenced in the table.

2.13 PfSH recently published an Economic, Employment and Commercial Needs (including logistics) Study¹⁹ which

¹³ Partnership for South Hampshire – Statement of Common Ground, October 2021

¹⁴ Partnership for South Hampshire – Statement of Common Ground, October 2021

¹⁵ It should be noted that housing requirement figures in local plans may differ, even for the same time period, due to the need to include a delivery buffer.

¹⁶ This figure covers the whole of New Forest District, including the part of the New Forest National Park within the district, and is covered by separate local plans prepared by NFDC & NFNPA.

¹⁷ This includes the 35% uplift in need that the Government has applied to the 20 largest cities in England.

¹⁸ This figure is derived from the TVBC Local Plan. Previous estimates have used population splits based on ward boundaries, although the ward boundaries are not contiguous with the PfSH boundary. The local plan splits the housing market in the borough between north and south and assumes a 33% population split in the southern housing market area.

¹⁹ Economic, Employment and Commercial Needs (including logistics) Study, Stantec, March 2021.

concluded that there is currently sufficient land allocated within South Hampshire to meet the need for employment development and there is no need to address this issue at the sub-regional level, as is the case for housing development.

2.14 The majority of the needs for housing and employment development up to 2036 are already planned to be met through existing planning permissions, allocations in local plans and neighbourhood plans and small-scale windfall development. However, there remain unmet housing needs which are not currently planned for across local authority areas and a strategic approach is needed to determine the most sustainable locations to accommodate this development within the sub-region.

2.15 Based on a record of existing planning permissions, suitable SHLAA sites and local plan allocations across the constituent authorities there is currently a shortfall of roughly 13,000 homes that needs to be addressed, with the vast majority of this shortfall being generated by the two largest urban conurbations of Portsmouth and Southampton. It should be noted however that several of the constituent local planning authorities are currently identifying additional sites for their areas as part of their emerging local plans and so the housing supply figures is likely to increase.

Potential distribution of future growth

2.16 In light of the need to identify additional locations for South Hampshire's likely growth shortfall up to 2036 and potentially beyond, work is underway to identify and analyse additional Strategic Development Opportunity Areas (SDOAs). A minimum size of 20 hectares or capacity of 500 dwellings has been used to help identify sufficiently strategic locations.

2.17 Each SDOA is being subject to transport impact assessments and Sustainability Appraisal to help define a preferred spatial strategy for the Joint Strategy; however, it is unclear at this point in the process what form the preferred opportunity areas will take in the Joint Strategy.

2.18 Work is ongoing to define and evidence a preferred sustainable pattern of development.

Aspiration for a South Hampshire Green Belt

2.19 Planners and politicians have been making a case for greater countryside protection in South Hampshire for 70 years. In 1958 a 'Hampshire Coast Green Belt' was formally proposed in a Written Statement by Hampshire County Council to the Minister of Housing and Local Government²⁰. The reason given for the designation of the Green Belt was

'...to check further substantial expansion of the built up areas of Southern Hampshire [and]...to prevent communities from merging into one another and to preserve its character' The principle of a Hampshire Coastal Green Belt was subsequently supported by the Minister of Housing and Local Government in 1960 in a letter in which the Minister identified the main objectives of a Green Belt in the area should be 'a) to prevent the coastal towns from spreading too far inland; and b) to keep the main built-up areas (Greater Portsmouth, Southampton, Eastleigh and Bournemouth-Christchurch, separate from each other'. However, the Green Belt was only formally approved around Bournemouth and Lymington and New Milton, as part of the South East Dorset Green Belt, through the adoption of the South-East Dorset Structure Plan in 1980.

2.20 In the absence of a formal Green Belt designation in South Hampshire, Hampshire County Council applied national Green Belt policy across the South West Hampshire Structure Plan Area from the early 1960s and, subsequently, in the late 1960s and the 1970s through the definition of an area of 'restraint' in the South Hampshire Structure Plan (adopted in 1977).

2.21 In 1980 Hampshire County Council submitted the South-West Hampshire Structure Plan to the Secretary of State, including a proposal for a Green Belt for the whole of South-West Hampshire (apart from the proposed Cranborne Chase AONB). Its stated purpose *'was to control the spread of urban development in the area lying between the growing conurbations of South Hampshire and South-East Dorset, and to protect the individual identity of the individual settlements'*²¹, but the Green Belt was again not formally approved. Similar attempts have been made by the sub-region's planning authorities during the preparation of subsequent plans, and the Hampshire-arm of Campaign to Protect Rural England (CPRE) has lobbied consistently on this issue.

2.22 The reasons consistently cited for a Green Belt in South Hampshire have not changed. There has been substantial growth of Eastleigh, Chandlers Ford, Hedge End, Fareham, Romsey, Totton, and Waterlooville (amongst others) and the development of new communities such as Valley Park, Whiteley and Welborne are ongoing.

Summary of PfSH ambitions

2.23 A clear understanding of what the PfSH authorities are trying to achieve through the designation of a Green Belt or an alternative policy mechanism is essential to establishing which option will deliver the widest range of desired policy outcomes most effectively.

²⁰ Hampshire County Council Hampshire Coast Green Belt Written Statement, 1958

²¹ South West Hampshire Structure Plan Examination In Public Report to Panel, 1981.

2.24 The contents of the PfSH Green Belt and green infrastructure designation study brief and latest Statement of Common Ground²² have been reviewed to define the following policy ambitions for the protection of the countryside in South Hampshire:

- To focus development within South Hampshire's existing major urban areas first.
- To ensure that the setting of settlements with distinct identities are protected by appropriate countryside gaps.
- To protect and enhance South Hampshire's most valued landscapes.²³
- To protect and enhance South Hampshire's green infrastructure network, delivering biodiversity net gains, protecting and connecting communities and the countryside, restoring the Nature Recovery Network²⁴ and building resilience to the effects of climate change²⁵.
- To co-ordinate a strategic approach to addressing the impact of development on the sub-region's sensitive ecological assets and functionally linked land²⁶, particularly the international designations in the Solent²⁷ and New Forest²⁸.

2.25 These policy ambitions have been used in **Chapter 7** to evaluate the compatibility of the identified policy mechanisms with PfSH's ambitions.

Report aims

2.26 This report aims to:

- Summarise the key PfSH planning ambitions in relation to the protection of open land within the area.
- Identify strategic green Infrastructure (GI) provision and landscape character and the key locations that need protection and enhancement.
- Evaluate the policy options to protect land in South Hampshire, including potentially the establishment of new Green Belt.
- Evaluate the delivery processes required to designate a new Green Belt, or secure appropriate alternative policy options.
- Guide PfSH on the policy mechanism or mechanisms that will deliver the desired policy outcomes.

2.27 This report does not establish the necessary exceptional circumstances for justifying and shaping the designation of a new Green Belt in South Hampshire. The necessary evidence to do this is not available at this point in time. Further detailed evidence is needed to do this, not least it must be demonstrated that South Hampshire can accommodate its growth needs in the long term and contribute to the needs of neighbours (if necessary). Furthermore, the shape of a new Green Belt, or other policy mechanisms cannot be defined until the spatial distribution of this future growth is defined and evidenced as a sustainable pattern of development.

Report authors

2.28 This report has been prepared by LUC on behalf of PfSH. LUC has completed Green Belt studies at a range of scales for over 50 English local planning authorities in the past ten years.

2.29 LUC is assisted by Douglas Edwards QC from Francis Taylor Building (FTB) Chambers who has provided expert legal advice on the policy mechanisms being considered at this stage. The legal advice is included in **Appendix A**.

Report structure

2.30 The remainder of this report is structured as follows:

- **Chapter 3** contains a high level assessment of the potential contribution of new Green Belt land to the five NPPF Green Belt purposes;
- **Chapter 4** sets out South Hampshire's green infrastructure context, including the existing network and the opportunities to conserve and enhance it;
- **Chapter 5** sets out South Hampshire's important strategic settlement gaps and the opportunities to conserve and enhance them;
- **Chapter 6** sets out South Hampshire's landscape context, landscape value and the opportunities to conserve and enhance it; and,
- **Chapter 7** sets out the policy mechanisms available to the PfSH authorities, outlines their compatibility with the authorities' ambitions and priorities set out in **Chapter 2** and reports their policy-making process, timescales and strengths and weaknesses.

²² Partnership for South Hampshire – Statement of Common Ground, October 2021

²³ Undesignated or designated, given the PfSH authorities have different approaches to protecting valued landscapes.

²⁴ Hampshire and Isle of Wight Nature Partnership and Wildlife Trusts Nature Recovery Networks

²⁵ Environment Act, UK Government, 2021

²⁶ Directive 2009/147/EC of the Conservation of Wild Birds

²⁷ Bird Aware Solent Strategy, Bird Aware Solent, December 2017

²⁸ Recreational Use of the New Forest Protected Habitats Study, Footprint Ecology, April 2020

Chapter 3

Potential Green Belt Performance of South Hampshire's Countryside

3.1 To fully understand the value of a new Green Belt designation in South Hampshire it is necessary to get a clear understanding of what function it could play and how it might perform, specifically how new Green Belt land would perform against the five purposes of national Green Belt planning policy.

3.2 This chapter sets out national Green Belt policy, before exploring the potential function of a South Hampshire Green Belt and the potential broad pattern of contribution open land in South Hampshire could make to each of the five national Green Belt purposes. Consideration of the pros and cons of designating a new Green Belt in South Hampshire is set out in Chapter 7.

Relevant national Green Belt policy and case law

3.3 National Green Belt policy is set out in Chapter 13 of the National Planning Policy Framework (NPPF) titled '*Protecting Green Belt Land*'. Paragraph 137 of the NPPF emphasises the '*great importance*' of Green Belts and states '*the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence*'.

3.4 This is elaborated in NPPF paragraph 138, which states that Green Belts serve five purposes:

- 1) To check the unrestricted sprawl of large built-up areas.
- 2) To prevent neighbouring towns merging into one another.
- 3) To assist in safeguarding the countryside from encroachment.
- 4) To preserve the setting and special character of historic towns.
- 5) To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

3.5 The NPPF identifies openness as an '*essential characteristic*' of Green Belt land, rather than a function or

purpose. Land which is fully developed cannot, therefore, be considered to contribute to the purposes of the Green Belt, but land which still retains some openness may do so.

3.6 Case law²⁹ makes it clear that Green Belt openness relates to a lack of 'inappropriate development' rather than to visual openness, thus both undeveloped land which is screened from view by landscape elements (e.g. tree cover) and land with development which is not considered 'inappropriate' are still 'open' in Green Belt terms.

3.7 The definitions of appropriate development contained within the closed lists in paragraphs 149 and 150 of the NPPF can be used to determine whether openness can be considered to have been already affected by existing development.

3.8 Paragraph 149 of the NPPF sets out the following exceptions to the general rule that new buildings are inappropriate in the Green Belt:

- 'buildings for agriculture and forestry;
- the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;
- the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;
- the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;
- limited infilling in villages;
- limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and
- limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:
 - not have a greater impact on the openness of the Green Belt than the existing development, or
 - not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified

affordable housing need within the area of the local planning authority.'

3.9 Paragraph 150 sets out other forms of development that are not inappropriate provided they preserve the openness of the Green Belt and do not conflict with the purposes of including land within Green Belt. These are:

- 'mineral extraction;
- engineering operations;
- local transport infrastructure which can demonstrate a requirement for a Green Belt location;
- the re-use of buildings provided that the buildings are of permanent and substantial construction;
- material changes in the use of land (such as changes of use for outdoor sport or recreation or for cemeteries or burial grounds); and
- development, including buildings, brought forward under a Community Right to Build Order or Neighbourhood Development Order.'

3.10 At this early stage in the exploration of a potential new Green Belt in South Hampshire attention has only been drawn to notably large and dense pockets of inappropriate development.

Assessment area

3.11 South Hampshire's existing urban areas, including land allocated in local plans for land uses deemed inappropriate in Green Belt terms through their absence in paragraphs 149 and 150 of the NPPF are not considered suitable for designation as Green Belt due to their inherent lack of openness and urbanising influence. Similarly, South Hampshire's existing nationally protected landscapes are considered to be sufficiently protected to not require designation as Green Belt, specifically the:

- Chichester Harbour AONB;
- New Forest National Park; and,
- South Downs National Park.

3.12 These national designations are sufficiently protected and managed by national legislation and associated planning policy (e.g. paragraph 176 of the NPPF). As National Park and AONB status affords these areas the highest status of protection in relation to landscape and scenic beauty, Green Belt designation is not being considered for the nationally protected landscapes. It is noted that other important

²⁹ The Court of Appeal decision in R (Lee Valley Regional Park Authority) v Epping Forest DC [2016] EWCA Civ 404 included reference to openness in relation to appropriate development, with the

judgement that appropriate development cannot be considered to have an urbanising influence and therefore harm Green Belt purposes.

environmental designations cover more discrete portions of South Hampshire's open countryside, such as flood zones and international and national ecological designations. Further consideration will be given to how these designations influence the case for designating a new Green Belt in **Chapter 7**.

3.13 **Figure 3.1** illustrates the extent of the assessment area in South Hampshire.

3.14 There is no defined approach set out in national planning policy or guidance as to how Green Belt studies should be undertaken. The approach used in this chapter is based on LUC's extensive experience of undertaking Green Belt studies for over 50 local authorities, several of which have been tested through Examination and found to be sound.

The potential function of a South Hampshire Green Belt

3.15 A helpful starting point in exploring the potential performance of a new Green Belt is to consider whether the open countryside already performs a Green Belt function. In order to establish the potential function a new Green Belt might play in a given area it is necessary to put a number of key national Green Belt policy terms in a local context.

3.16 It is not necessary for each of the purposes to be met to make a case for a new Green Belt. Each of the five Green Belt purposes may not hold equal importance in South Hampshire. For example, the primary functions of the Green Belt surrounding Cambridge has long been recognised to be more focussed on Green Belt purposes 1, 2 and 4 than purposes 3 and 5.

3.17 Each national Green Belt purpose targets a different aspect of the relationship between urban areas and open land. The applicability of each of the Green Belt purposes to any given area of land depends on the nature of the urban area with which that land is associated.

3.18 For purpose 1 (preventing the sprawl of large built-up areas) we define what settlements make up the 'large built-up area'; for purpose 2 (preventing the coalescence of towns) we define which settlements make-up 'neighbouring towns'; for purpose 3 (safeguarding the countryside from encroachment) we define 'countryside'; and for purpose 4 (preserving the setting and special character of historic towns) we define

which 'historic towns' rely on the open countryside to preserve their setting and special character. Our approach to defining these key terms is set out below.

3.19 The extent of each of these defined areas³⁰ is also illustrated in **Figure 3.2**.

South Hampshire's large built-up areas (Green Belt purpose 1)

3.20 Green Belt purpose 1 aims 'to check the unrestricted sprawl of large built-up areas'. There is no definition provided in the NPPF for a large built-up area. Green Belt studies in different locations have ranged from considering the large built-up area as just the principal settlement around which the Green Belt was defined, to considering all inset settlement to be large built-up areas. The following settlements are judged by LUC to form a closely connected built-up area, large enough in combination to form South Hampshire's large built-up:

- **Eastleigh** merged with **Chandlers Ford**³¹. Together they form a contiguous built-up area in close proximity to Southampton;
- **Fareham** merged with **Gosport**³² and **Welborne** via the A32 to the south and north. Together they form a contiguous built-up area separated only by the urbanising M27;
- **Havant** merged with **Bedhampton, Emsworth, Leigh Park** and **Langstone** (north). Together they form a contiguous built-up area in close proximity to Portsmouth;
- **Hedge End** merged with **Boorley Green**. Together they form a contiguous built-up area in close proximity to Southampton;
- **Locks Heath** merged with **Sarisbury, Warsash**³³ and **Titchfield Common**³⁴ and **Burridge, Swanwick** and **Whiteley** via the A27 north of the M27. Together they form a largely contiguous built-up area separated only by the urbanising M27;
- **Portsmouth** is contained by harbours to the east and west of; however, its urban area does sprawl northward of the M27 merging with neighbouring **Cosham**,

³⁰ The defined urban areas include local plan site allocations contiguous with the existing urban areas, some of which may yet to be developed.

³¹ Bishopstoke merged with Fair Oak is a smaller urban area that is considered to be sufficiently separated from Eastleigh by the Itchen Valley to not form part of the large built-up area.

³² Stubbington and Lee-on-the-Solent are smaller settlements that are considered to be sufficiently separate from Gosport and Fareham by the Alver Valley to not form part of the larger built-up area.

³³ Bursledon, Netley and Hamble-le-Rice are smaller settlements that are considered to be sufficiently separated from Southampton and Warsash by undulating open countryside and waterways to not form part of the larger built-up area.

³⁴ Titchfield is a smaller settlement that is considered to be sufficiently separated from Fareham and Locks Heath by the Meon Valley to not form part of the larger built-up area.

Farlington and **Portchester**, all of which are considered to form part of the same large built-up area;

- **Southampton** urban area is largely contained by the M27 and Southampton Water; and,
- **Waterlooville** merged with **Cowplain**, **Horndean**, **Purbrook** and **Widley**. Together they form a contiguous built-up area in close proximity to Portsmouth.

3.21 Other settlements not referenced in this list are judged by LUC to be separate and too small in isolation to be considered large built-up areas in their own right.

South Hampshire's neighbouring towns (Green Belt purpose 2)

3.22 Green Belt purpose 2 aims 'to prevent neighbouring towns merging into one another'. The concept of what constitutes a 'town' has been widely interpreted in different Green Belt studies, ranging from settlements classified as towns in local plan settlement hierarchies to all urban areas inset from the Green Belt regardless of size. As there is no specific definition of a 'town', it is important to consider the underlying purpose, which is to prevent significant settlements from merging.

3.23 LUC has reviewed the adopted local plans and settlement hierarchies of each of the constituent South Hampshire planning authorities to get a clear understanding of which settlements are defined as towns in each local authority area. This has revealed that the range and scale of settlements across the South Hampshire vary significantly – a settlement large enough to be defined as a town in one District is too small to be considered as a town by a neighbouring Borough. It has therefore been necessary to define some settlements not defined as towns in relevant local plans or settlement hierarchies as towns in Green Belt terms. This is to maintain a level of consistency across the study area. For example, the relatively small settlement of Marchwood in New Forest District is identified in its settlement hierarchy as a town, but the new settlement of Welborne in Fareham Borough is not. Consequently, given Welborne is a comparatively similar size and density to other smaller settlements in South Hampshire it too has been defined as a town in Green Belt terms, for consistency.

3.24 A settlement can be defined as both part of a large built-up area (relevant to Green Belt purpose 1) and a neighbouring town (relevant to Green Belt purpose 2) in recognition of the fact that remnant gaps between largely merged, or at least closely related neighbouring towns, still exist.

3.25 The following settlements are judged by LUC to be neighbouring towns in Green Belt terms³⁵:

- **Bishopstoke** merged with **Fair Oak** (Eastleigh Borough);
- **Bishop's Waltham** (Winchester District);
- **Clanfield** (East Hampshire District);
- **Eastleigh** merged with **Chandlers Ford** (Eastleigh Borough);
- **Fareham** (Fareham Borough);
- **Gosport** (Gosport Borough);
- **Havant** merged with **Emsworth** (Havant Borough);
- **Hedge End** (Eastleigh Borough);
- **Horndean** (East Hampshire District) merged with **Cowplain**, **Waterlooville** and **Purbrook** (Havant Borough);
- **Hythe** (New Forest District);
- **Lee-on-the-Solent** (Gosport Borough);
- **Locks Heath** merged with Sarisbury, Warsash and Titchfield Common (Fareham Borough);
- **Marchwood** (New Forest District);
- **Portsmouth** merged with neighbouring **Cosham** and **Farlington** (Portsmouth City) and **Portchester** (Fareham Borough);
- **Romsey** (Test Valley Borough);
- **Southampton** merged with West End in Eastleigh Borough;
- **South Hayling** (Havant Borough)
- **Stubbington** (Fareham Borough)
- **Totton** (New Forest District);
- **Welborne** (Fareham Borough);
- **Winchester** (Winchester District); and,
- **Whiteley** (Winchester District) merged with **Swanwick** and **Burridge** (Fareham Borough).

3.26 Settlements smaller than the settlements listed above are considered to be too small to be defined as towns in Green Belt terms, but it is acknowledged that smaller settlements may lie in between towns and the loss of separation between smaller settlements may have a significant impact on the overall separation between

³⁵ Several of these settlements are considered close enough together to be recognised as a part of South Hampshire's large built-up area

(purpose 1), but they also retain enough distinction to be considered as neighbouring Green Belt towns (purpose 2).

neighbouring towns, e.g. the necklace villages surrounding Cambridge. Notable smaller settlements in gaps between the defined towns include:

- Bursledon/Lower Swanwick, Netley and Hamble-le-Rice in between the neighbouring towns of Southampton and Locks Heath (merged with Sarisbury, Warsash and Titchfield Common);
- Botley / Boorley Green in between the neighbouring towns of Bishops Waltham and Hedge End.
- Colden Common, Shawford and Twyford in between the neighbouring towns of Bishopstoke, Eastleigh (merged with Chandlers Ford) and Winchester;
- Horton Heath in between the neighbouring towns of Bishopstoke (merged with Fair Oak) and Hedge End;
- North Baddesley in between the neighbouring towns of Chandlers Ford (merged with Eastleigh), Romsey and Southampton;
- Stoke and North Hayling in between the neighbouring towns of Havant and South Hayling;
- Titchfield in between the neighbouring towns of Locks Heath (merged with Sarisbury, Warsash and Titchfield Common) and Fareham; and,
- Shirrell Heath, Swanmore, Waltham Chase and Wickham in between Bishops Waltham and Welborne.

South Hampshire's open countryside (Green Belt purpose 3)

3.27 Green Belt purpose 3 aims *'to assist in safeguarding the countryside from encroachment'*. An assessment of purpose 3 requires consideration of the extent to which land constitutes 'countryside' on the basis of its usage. At this early stage in the exploration of the potential for a Green Belt in South Hampshire, countryside has been defined as all land outside of South Hampshire's existing urban areas, including cities, towns and large villages. The latest urban boundaries of these settlements have been obtained from each constituent local authority, incorporating site allocations contiguous with the urban area.

3.28 Development that is rural in form may sometimes not be considered to detract from countryside character, whereas urban development often does have an impact on the degree to which land is considered to be countryside. Developments considered to be not inappropriate in Green Belts are set out in the national policy summary section above.

3.29 It is important for the purposes of the assessment not to stray into assessing landscape character, sensitivity or value³⁶. Whilst land may be valuable in these respects it is not a requirement or purpose of the designation to provide such qualities. Therefore, the condition of land is not taken into consideration. Any land found to be in poor condition may perform well in its fundamental role of preventing encroachment by keeping land permanently open.

South Hampshire's historic towns (Green Belt purpose 4)

3.30 Green Belt purpose 4 aims *'to preserve the setting and special character of historic towns'*. This purpose makes specific reference to *'historic towns'*, not to individual historic assets or smaller settlements such as villages and hamlets.

3.31 An extract from Hansard in 1988 clarifies which historic settlements in England were certainly considered *'historic towns'* in the context of the Green Belt purposes. The Secretary of State for the Environment clarified in answer to a parliamentary question that the purpose of preserving the special character of historic towns is especially relevant to the Green Belts of York, Chester, Bath, Oxford and Cambridge³⁷. Durham has since been added to this list.

3.32 Purpose 4 is sometimes interpreted more widely to encompass smaller settlements with evident historic characteristics, but to do so risks challenge. The PAS guidance (Planning on the Doorstep 2015) notes that *'this purpose is generally accepted as relating to very few settlements in practice.'* In consultation responses that Historic England has provided to Green Belt studies undertaken by LUC, they do not always consider the list of towns quoted in Parliament to necessarily be exclusive.

3.33 It is acknowledged that there are historic aspects to towns and smaller settlements within South Hampshire, with several 'towns' having designated conservation areas. However, for potential Green Belt land to contribute to this purpose it needs to have a relationship with historic aspects of a settlement's setting, such that some degree of special character results.

3.34 A significant proportion of the larger historic settlements in South Hampshire, e.g. Portsmouth/Gosport and Southampton, are centred around historic ports, focusing on their respective harbours and the open sea beyond rather than the wider open countryside. Some historic cores are also surrounded by a considerable amount of intervening modern development, separating them from the surrounding open countryside, e.g. Gosport, Portsmouth and Southampton. This reduces the physical relationship between the historic areas of

³⁶ These considerations fall within a separate study being carried out by White Consultants.

³⁷ Hansard HC Deb 08 November 1988 vol 140 c148W 148W; referenced in Historic England (2018) response to the Welwyn Hatfield Local Plan – Green Belt Review – Stage 3.

the 'historic towns' and the wider countryside such that any visual connection with the wider countryside is incidental rather than contributing any special character. A significant proportion of South Hampshire's historic settlements are also too small to be considered historic towns in their own right, including historic settlements that have since merged with neighbouring settlements to form larger town-like settlements, e.g. Sarisbury.

3.35 Consequently, only two areas of open countryside that are considered to contribute directly to the setting and special character of South Hampshire's historic settlements are large enough to be considered as 'historic towns':

- **Portsdown hill** north of historic Portsmouth is recognised in a number of landscape assessments referenced in **Chapter 6** as an important landform feature. The Portsmouth City Council Urban Characterisation Study³⁸ highlights the ridge as important to the setting of the city to the north, providing spectacular panoramic views across the city and its merged suburbs.
- **The Test valley** north west, west and south west of historic Romsey is recognised in the Romsey Conservation Area Appraisal³⁹ to be important to the setting and special character of this historic town.

3.36 It should be stressed that the historic character and the significance of historic assets are important considerations for the development of any land, regardless of whether it is designated as Green Belt. These factors will be considered by the Councils in their review of the most suitable locations for development.

Purpose 5: assisting in urban regeneration by encouraging the recycling of derelict and other urban land

3.37 Green Belt purpose 5 aims 'to assist in urban regeneration by encouraging the recycling of derelict and other urban land'. The designation of countryside outside existing urban areas as Green Belt is therefore inherently bound to assist in this purpose. This may not be a function

which alone would justify a new Green Belt but would contribute to the overall case for one.

Key considerations when assessing Green Belt performance

3.38 Having set out how South Hampshire's settlement pattern relates to national Green Belt policy, the following section considers the relationship South Hampshire's open countryside has with these urban areas.

3.39 Exploring the relationship open countryside has with urban areas is a useful way of establishing the likely performance of new Green Belt land. Land that is related more strongly to urbanising development typically makes a weaker contribution to the Green Belt purposes, whereas land which is related more strongly to the open countryside typically makes a stronger contribution.

3.40 Consideration of the relationship between defined built-up areas and the open countryside (degree of distinction) is generally influenced by:

- boundary features⁴⁰;
- landform and land cover⁴¹; and
- urbanising influence⁴².

3.41 These factors influence the contribution of a new Green Belt against each Green Belt purposes in different ways:

- Purpose 1 (to check the unrestricted sprawl of large built-up areas):
 - Distinct land which sits immediately adjacent to large built-up areas is generally considered to make the strongest contribution to preventing the sprawl of defined large built up areas, by virtue of its close proximity to them.
 - Beyond the first few consistent readily recognisable and permanent boundary features, farther away from the urban edge, contribution is considered to be lower.

³⁸ Portsmouth Urban Characterisation Study, Portsmouth City Council, March 2011

³⁹ Romsey Conservation Area Appraisal and Management Plan, Test Valley Borough Council, December 2020.

⁴⁰ Stronger boundary features are likely to lead to stronger distinction and are also considered to have more permanence. The cumulative impact of multiple minor boundary features can be equally significant as a single strong boundary feature.

⁴¹ Landform and land cover may serve as boundary features, but this may extend into a broader feature which creates greater distinction for example a woodland, lake or valley.

⁴² It is accepted that there is a visual dimension to the perception of openness that can have a bearing on the distinction between urban areas and countryside. Samuel Smith Old Brewery (Tadcaster) and Oxtan Farm v North Yorkshire County Council and Darrington Quarries Ltd (2018) includes judgements relating to the visual aspects of openness. Turner v Secretary of State for Communities and Local Government & East Dorset District Council (2016) makes reference to the important visual dimension of consideration of impact on the Green Belt purposes.

- Purpose 2 (to prevent neighbouring towns merging into one another):
 - Only land that is juxtaposed between neighbouring towns is relevant to this purpose. The role open land plays in preventing the merging of towns is more than a product of the size of the gap between them. Both the physical and visual role that intervening land plays in preventing coalescence is important.
 - Built and natural landscape elements can act to either decrease or increase perceived separation. For example, intervisibility, a direct connecting road or rail link, or a shared landform may decrease perceived separation, whereas a separating feature such as a woodland block or hill may increase the perception of separation in a narrow gap.
 - Where settlements are very close, a judgement is made as to whether their proximity is such that the remaining open land does not play a critical role in maintaining a distinction between the two towns (i.e. that the characteristics of the open land relate more to the towns' areas themselves than to the open land in between). Where this is the case, the contribution of land to Purpose 2 may be reduced.
 - Expansion into land that lacks strong distinction from a town is likely to have less perceived impact on separation from a neighbouring town.
- Purpose 3 (to assist in safeguarding the countryside from encroachment):
 - The vast majority of countryside tends to be open and has strong distinction from the urban areas and therefore makes a strong contribution to purpose 3.
 - Some open land may, through its usage, have a stronger relationship with the adjacent urban area and, as a result, not be considered 'countryside' to the same degree as other open land.
 - Some open land may be largely contained by urban development but may nonetheless retain, as a result of its usage and its size, a countryside character.
- Purpose 4 (to preserve the setting and special character of historic towns):
 - Contrary to the other purposes, a lack of distinction between open countryside and historic towns can sometimes result in an increase in contribution to purpose 4, given countryside needs to have a relationship with historic aspects of a historic town's setting such that some degree of special character results.
- Purpose 5 (assisting in urban regeneration by encouraging the recycling of derelict and other urban land):
 - In the absence of any clear guidance on what percentage of brownfield land would enable the Green Belt to play a stronger, or more limited, role in encouraging urban regeneration, all open countryside in South Hampshire is considered to contribute on an equal basis to Purpose 5.

Key factors in South Hampshire influencing the potential performance of a new Green Belt

3.42 This section describes the most significant natural and man-made features that mark the strongest distinction between South Hampshire's open countryside and main settlements. It is in these locations where there are likely to be the greatest strategic variations in Green Belt performance – both strong and weakly performing Green Belt – depending on the nature and location of the features.

Portsdown hill

3.43 Portsdown hill to the north of the suburbs of Portsmouth serves as a defensible boundary, inhibiting the northwards sprawl of Portsmouth (purpose 1) and maintaining separation in what remains of the very narrow gaps between Farlington, Purbrook and Havant (purpose 2). This open high ground enjoys extensive and expansive views over the wider countryside, maintaining a strong connection with it (purpose 3). Furthermore, the presence of several Palmerston Forts along the ridge is linked to the importance of historic Portsmouth as naval base. Consequently, the ridge is considered to also make a strong contribution to the setting and special character of historic Portsmouth (purpose 4).

The M27 motorway

3.44 The M27 represents a strong consistent boundary to the north of Southampton, which could form a defensible Green Belt boundary helping to check the northward sprawl of Southampton towards Eastleigh (purpose 1). Furthermore, both the motorway and dense woodlands surrounding and to the east of Chilworth village serve to maintain separation between Eastleigh and Southampton (purpose 2). This function is limited to some extent by the fact that Southampton Airport and Southampton Parkway station extend north of the motorway almost merging the two settlements along the railway line, which serves as a key connecting feature between the two settlements, along with the M3 and A335. However the overall gap is primarily open and Southampton and Eastleigh are perceived as two clearly distinct settlements.

3.45 The M27, coupled with the mature woodland within and around the grounds of the Ageas Bowl, plays a similar separating function between Hedge End and Southampton (purpose 2), although the narrowness of this gap coupled with several key connecting roads between the two (e.g. the A334) reduce the value of this gap in Green Belt terms, to the extent that Hedge End is perceived to be very closely related to the wider large built-up area of Southampton, sprawling north of the motorway. This in turn limits the value of the M27 as a strong retaining barrier to sprawl of the large built-up area in this location.

3.46 Save for the M27 and adjacent railway line, the merged settlements of Burridge, Swanwick and Whiteley have merged with the larger built-up area of Locks Heath to the south of the motorway which again, coupled with the connecting roads between (e.g. the A3051) create a strong connection to the large built-up area north of the M27. However, farther northward, sprawl in this area is checked by Botley Wood, the railway line and River Hamble, increasing distinction and therefore contribution to purpose 1 immediately beyond these boundary features. The same can also be said north of Fareham following the allocation of the new settlement of Welborne merged with the existing village of Knowle, with the ridge, railway line, River Meon and A32 representing alternative, albeit less consistent boundaries to the wider open countryside.

3.47 Generally, the remaining small open pockets of countryside in between the large built-up area south of the M27 (notably Fareham, Portsmouth and Southampton) and the M27 have a very limited relationship with the wider open countryside and are often contained and urbanised, limiting contribution to purposes 1, 2 and 3 in these locations. Notable exceptions include Lord's Wood north of Southampton and the Meon valley.

The Itchen Valley Country Park

3.48 The Itchen valley in between Southampton, Eastleigh and Bishopstoke merged with Fair Oak serves to check the north eastwards sprawl of Southampton and Eastleigh (purpose 1) and maintain separation between them (purpose 2). The open areas of the valley also serve to maintain a strong connection to the wider open countryside farther along the river valley, increasing contribution to purpose 3.

The Test valley

3.49 The Test valley in between Southampton and Totton checks the westwards sprawl of Southampton either side of the M27 (purpose 1) and maintains separation between Southampton and Totton. The open areas of the valley also serve to maintain a strong connection to the wider open

countryside farther along the river, increasing contribution to purpose 3.

3.50 The Test valley, including the Broadlands Estate, is integral to the rural setting and special character of the historic town of Romsey. Romsey Town Centre Conservation Area Appraisal states '*the special interest of Romsey is derived from it being a quintessential, historic English market town set within a rural, agricultural landscape*'. Consequently, the parts of the Test valley and Broadlands Estate in the immediate vicinity of historic Romsey are considered to make a strong contribution to Green Belt purpose 4.

Narrow river valleys

3.51 There are a number of narrower river valleys sandwiched between parts of South Hampshire's large built-up area. These narrower valleys play an important role in breaking-up the sprawling extent of the large built-up area (purpose 1), maintaining separation between several of its constituent towns (purpose 2) and connecting some of the more urbanised locations with the wider open countryside (purpose 3). However, the containing and/or urbanising influence of the urban areas in these locations generally serve to limit, albeit partially, the significance of these features as important factors in the potential contribution of parts of South Hampshire's open countryside to the Green Belt purposes. Notable locations include the:

- **Alver valley** in between Fareham and Stubbington and Lee-on-Solent and Gosport;
- **Hamble valley** in between Bursledon and Lower Swanwick and Hamble-le-Rice and Warsash;
- **Itchen valley** in between Eastleigh and Bishopstoke merged with Far Oak;
- **Meon valley** in between Fareham and Titchfield;
- **Test valley** in between Southampton and Totton; and,
- **Tickleford Gully** and **Westwood** in between Southampton and Bursledon and Netley.

3.52 The open countryside gaps in between Totton, Marchwood, and Hythe in New Forest District are not river valleys but perform a similar function in maintaining separation between these neighbouring towns, a function which is made both more important and more vulnerable by the strength of the connecting features between them, namely the railway line and the A326.

Contained or urbanised land

3.53 Inappropriate development within a Green Belt generally lowers contribution to purposes 1, 2 and/or 3. It is generally assumed that such inappropriate development would not be

included in a new Green Belt, but more isolated pockets of inappropriate development could be washed over with the designation to inhibit further development and protect what remains of the open countryside in particularly vulnerable locations, for example at Fawley oil refinery. The more isolated and generally less dense pockets of inappropriate development, such as some of the larger villages in Winchester District make a more moderate contribution to purpose 3 by virtue of their greater distinction from the main urban areas.

3.54 Open land directly adjacent to urban settlements containing appropriate land uses such as outdoor sports pitches and cemeteries often have more of an association with the adjacent urban areas than the wider countryside and therefore may make a lower contribution to purposes 1, 2 and/or 3. Notable examples include:

- The Boundary Lakes Golf Course separated from the wider countryside by the M27;
- Cams Hall Estate Golf Club, separated from the wider countryside by the urban edge of Portchester to the north;
- Great Salterns Recreation Ground, Milton Common and Portsmouth Golf Centre;
- Seafield and Salterns Park;
- Southampton Municipal Golf Course and neighbouring sports pitches, screened from the wider countryside by the Chilworth woodlands;
- Southsea Common and adjacent open spaces; and,
- University of Southampton and Stoneham sports grounds.

3.55 The open land in these locations is also generally contained by the urbanising influences of the urban edges and/or strong boundary features.

Likely strategic contribution of a South Hampshire Green Belt to the national Green Belt purposes

3.56 Taking the above broad observations as a whole it is possible to determine in broad strategic terms the likely contribution of a South Hampshire Green Belt to the Green Belt purposes. The key factors influencing a potential South Hampshire Green Belt are illustrated in **Figure 3.2**.

Purpose 1: To check the unrestricted sprawl of large built-up areas

3.57 A new Green Belt would check the continued northwards sprawl of South Hampshire's large built-up area (purpose 1)

north of the M27, east and west of Eastleigh, and west of Waterlooville and Purbrook. The proximity of the settlements south of the M27 is such that development south of the motorway would generally represent infilling rather than sprawl; however, there are some larger open areas south of the M27 that if developed would be too large to be considered infill, for example the open countryside between Locks Heath and Stubbington and north of Hamble-le-Rice. The contribution of land to purpose 1 south of the M27 is therefore likely to be weaker in many places. Relative to the size of the chain of large built-up areas, all open countryside in between the large built-up area and the South Downs National Park is likely to make a contribution to purpose 1.

Purpose 2: To prevent neighbouring towns merging into one another

3.58 A Green Belt would prevent the merging of several neighbouring towns (purpose 2), such as Southampton - Eastleigh and Locks Heath/Whiteley - Fareham/Welborne, although the narrowness, urban nature and/or connecting features between some towns is such that the remaining open land is already playing a diminished role in some locations, such as in between Lee-on-the-Solent and Stubbington or Havant and Waterlooville.

Purpose 3: To assist in safeguarding the countryside from encroachment

3.59 A Green Belt would safeguard the vast majority of the open countryside from encroachment (purpose 3), although there are locations, particularly south of the M27 adjoining urban areas where some open land is more isolated and contained by urbanising development and/or strong boundary features, diminishing its relationship with the wider open countryside. There are some notable exceptions to this south of the M27 including Lord's Wood north of Southampton and the Meon valley where land would make an important contribution to Purpose 3.

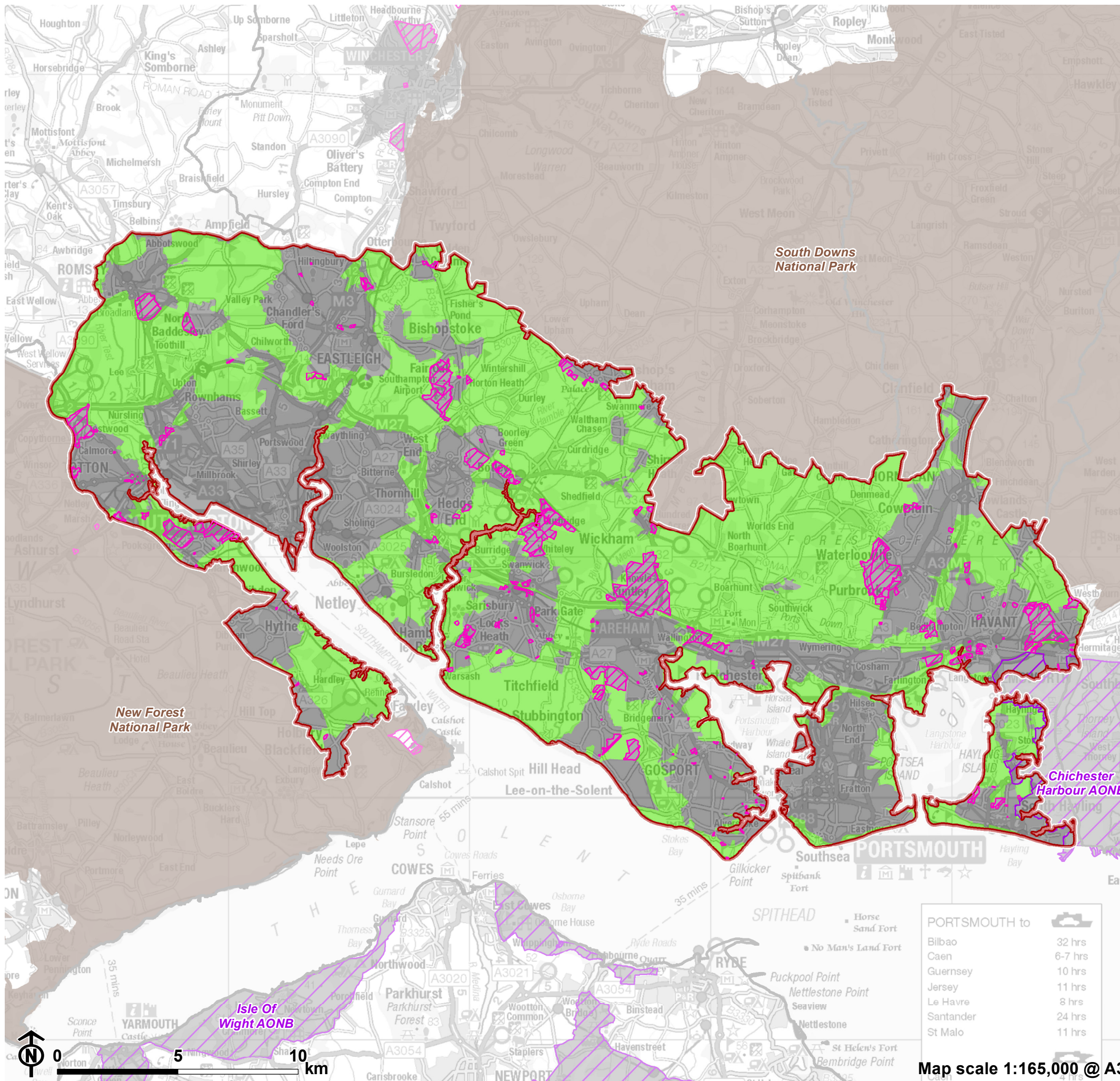
Purpose 4: To preserve the setting and special character of historic towns

3.60 A Green Belt would help to preserve the setting and special character of historic Portsmouth and Romsey (purpose 4) through the designation of the Portsdown hill and parts of the Test Valley, respectively.

Purpose 5: To assist in urban regeneration, by encouraging the recycling of derelict and other urban land

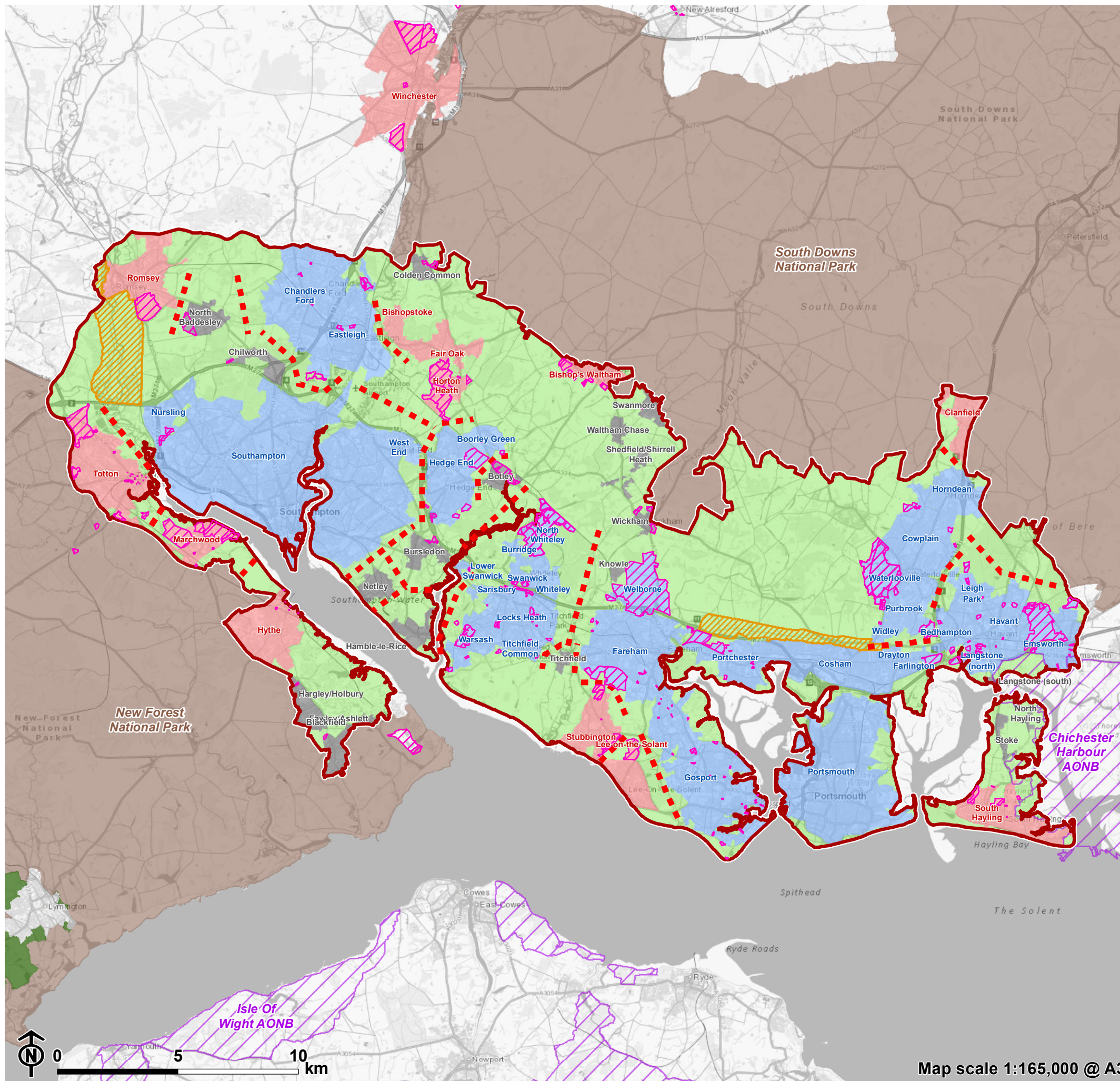
3.61 A Green Belt would assist in urban regeneration by encouraging the recycling of all remaining derelict and other urban land outside a new Green Belt (purpose 5).

Figure 3.1: South Hampshire Designation Assessment Area



- Study area
- Defined development allocations within and adjacent to the existing urban areas
- Neighbouring authority
- Designation Assessment Area
- Land outside of the Designation Assessment Area
- Area of Outstanding Natural Beauty
- National Park

Figure 3.2: Potential Green Belt Settlements and the Roles a Green Belt Would Play in Protecting Them



- Study area
 - Defined development allocations within and adjacent to the existing urban areas
 - Neighbouring authority
 - Designation Assessment Area
 - Areas preventing neighbouring towns from merging (likely Purpose 2 contribution)
 - Areas important to the setting and special character of historic towns (likely Green Belt Purpose 4 contribution)
 - Large built up area⁺
 - Town⁺
 - Other urbanising settlement⁺
 - Existing Green Belt
 - Area of Outstanding Natural Beauty
 - National Park
- * All open countryside is likely to contribute to Green Belt Purpose 3.
- ⁺ Settlements that form part of the large built up area are also considered to represent Green Belt towns.



Map scale 1:165,000 @ A3

Chapter 4

South Hampshire's Green Infrastructure

4.1 This chapter sets out the context of planning for green and blue infrastructure (GBI) in South Hampshire. It outlines key strategic assets and opportunity areas, as influenced by national, regional and local policy documents.

Definitions of key terms

4.2 The Partnership for South Hampshire (PfSH) defines green infrastructure as:

*'a multi-functional network of green and blue spaces, urban and rural, that is capable of delivering a wide range of environmental and quality of life benefits for local communities.'*⁴³

4.3 This includes the strategic network (rivers, country parks, the coast, large tracts of woodland) and an extensive rights of way network and local green infrastructure (e.g. parks, play areas, allotments, street trees and a network of landscape feature such as hedgerows).

4.4 In defining green and blue infrastructure, the TCPA emphasises the 'multifunctionality' of GBI. This means that one GBI 'asset' can provide multiple functions (or 'benefits') simultaneously. These include, but are not limited to:

- Conserving and enhancing biodiversity.
- Supporting peoples' physical and mental health.
- Encouraging active travel.
- Cooling urban areas during heat waves.
- Attracting investment.
- Reducing water run-off during flash flooding.
- Carbon storage.
- Providing sustainable drainage.⁴⁴

⁴³ Partnership for South Hampshire website: <https://www.push.gov.uk/work/planning-and-infrastructure/green-infrastructure-flooding-water-management/>

⁴⁴ TCPA (n.d), 'What is green infrastructure'. Available at: shorturl.at/pxBQX

National policy context

The 25YEP and Environment Act 2021

4.5 As a result of the ambitions set out in the 25 Year Environment Plan (25YEP), the role of GBI has risen rapidly up the political agenda in the UK.

'Green and blue spaces in our built environment are essential to health and happiness. Yet urban greenspace is unequally distributed. The provision of more and better quality green infrastructure, including urban trees, will make towns and cities attractive places to live and work, and bring about key long-term improvements in people's health.'

'Better green infrastructure will promote local social interaction and help to develop strong community networks through participation and shared achievements.'

25 Year Environment Plan

4.6 The subsequent Environment Act (which passed into law in 2021) sets the 25YEP on statutory footing.

4.7 The Act includes a number of legally binding environmental targets, notably the provision of mandatory 10% Biodiversity Net Gain (BNG) and the mapping and maintenance of Nature Recovery networks (NRNs).

4.8 It sets out *'an approach to development that leaves biodiversity in a better state than before'*. In addition to minimising loss of biodiversity through the mitigation hierarchy, BNG should support the restoration of ecological networks.

The UK's net zero policy and GBI networks

4.9 The UK's *Net Zero Strategy: Build Back Greener*⁴⁵ highlights that:

'Halting climate change and protecting the natural world are two sides of the same coin, so we will restore our countryside to reduce emissions, sequester carbon and build our resilience to climate change at the same time.'

4.10 This include various measures that have implications for the GBI network, including:

- using tree planting to sequester carbon;
- protecting and restoring peatlands.

4.11 The 25YEP also supports the expansion of natural flood management (NFM) solutions, alongside traditional defences, to boost resilience to inevitable effects of climate change.

4.12 A variety of measures are proposed including:

- tree planting;
- river bank restoration;
- building small-scale woody dams;
- reconnecting rivers with their flood plains; and
- storing water temporarily on open land.

The National Planning Policy Framework (NPPF)

4.13 The National Planning Policy Framework (NPPF)⁴⁶ supports the provision and enhancement of open space for recreation.

4.14 Paragraph 8 sets out the NPPF's three objectives for achieving sustainable development, including an environmental objective, required to be delivered through the preparation and implementation of plans and the application of policies in the NPPF:

'Environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.'

4.15 Paragraph 98 of the NPPF stresses that access to a network of high quality open spaces is important for the health and well-being of communities, whilst delivering wider benefits for nature and helping to address climate change.

4.16 Importantly, paragraph 175 states that local plans should take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure, and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.

4.17 The provision of green infrastructure is therefore a strategic matter, about which local authorities are expected to cooperate (as part of the wider Duty to Cooperate).

4.18 The NPPF also recognises the importance of food production as one of the ecosystem services provided by the countryside – including the economic and other benefits of the 'best and most versatile' agricultural land (paragraph 174).

⁴⁵ HM Government (2021), *Net Zero Strategy: Build Back Greener*

⁴⁶ Department for Levelling Up, Housing and Communities (as updated in 2019), *National Planning Policy Framework*.

Regional and local policy context

The South Hampshire GI Strategy (2017)

4.19 The South Hampshire GI Strategy was prepared jointly by the Partnership for Urban South Hampshire (PUSH)⁴⁷. Its purpose is to set the vision and framework for the delivery of an integrated and multifunctional network of strategic scale GI across the South Hampshire sub-region. It replaces an earlier 2010 strategy.

4.20 The Strategy identifies 10 Strategic Projects – each of which is sub-divided into sub-projects. These are summarised later in this chapter. The Strategy is accompanied by a South Hampshire GI Strategy Implementation Plan (2017)

The treatment of GBI within local plans

4.21 GBI is most effectively treated within local plans when GBI considerations are 'mainstreamed' through a wide range of policies.

4.22 **Table 4.1** sets out some of the key local policies relating to green and blue infrastructure at a strategic scale.

Table 4.1: Local planning policy

Constituent PFSH authority	Key documents or policies
Portsmouth	<p>The Portsmouth Plan (2012) includes Policy PCS13: A Greener Portsmouth. This focuses on mitigating any impacts of development on GI. New GI is to be provided through pocket parks at developments >50 dwellings and through the new Horsea Island Country Park (former landfill site).</p> <p>The current planning policy framework includes saved policies from the Portsmouth City Local Plan (2006) including CM8 Portsdown Hill which seeks to protect open space and undeveloped land.</p>
Southampton	<p>Southampton Core Strategy (2015) supports a sub-regional approach to protecting biodiversity, particularly through the South Hampshire GI Strategy. Relevant policies include:</p> <ul style="list-style-type: none"> ■ Policy CS20 (Tackling and Adapting to Climate Change) ■ Policy CS 21 (Protecting and Enhancing Open Space) ■ Policy CS 22 (Promoting Biodiversity and Protecting Habitats).

Constituent PFSH authority	Key documents or policies
	Promotes a new forest park at Lords Wood on the northern city boundary (as part of the PUSH GI Strategy).
Eastleigh	<p>The Eastleigh Local Plan (2022) outlines how the Council intends to manage green infrastructure issues (Issue G4) has interpreted elements of the PUSH GI Strategy through Background Paper G1, identifying strategic routes and other GI assets.</p> <p>There is a dedicated GI policy (Policy S10: Green Infrastructure)</p>
East Hampshire	<p>The East Hampshire Local Plan: Joint Core Strategy (adopted 2014) supports the PUSH GI Strategy and also has a dedicated GI policy (CP28 – Green Infrastructure).</p> <p>A separate East Hampshire GI Strategy (excluding the South Downs) was also produced for East Hampshire in 2019. It sets out a number of site-specific and District-wide strategic projects.</p>
Fareham	<p>The Fareham Borough Core Strategy (2011) supports the PUSH GI Strategy and includes a policy dedicated to GI – Policy CS4: Green Infrastructure, Biodiversity and Geological Conservation. In particular, it refers to the Forest of Bere Land Management Initiative.</p> <p>The emerging Fareham Local Plan 2037 includes a policy dedicated to GI – Policy NE9: Green Infrastructure.</p>
Gosport	<p>The adopted Gosport Local Plan (2011-2029) treats GI through Policy LP41 (Green Infrastructure) requires development to respect the integrity of the GI network.</p> <p>The draft Gosport Borough Local Plan 2038 treats GI within Strategic Policy D4: Green Infrastructure Network.</p> <p>The Borough Council notes that it will work with partners to explore GI opportunities as part of the wider PFSH GI Strategy. It notes in particular projects to enhance the Alver Valley Country Park, water quality improvements and directing recreational pressure away from European sites.</p>
Havant	The Havant Borough Core Strategy (adopted 2011) treats GI through Policy CS13 (Green Infrastructure). It supports the PUSH GI Strategy – particularly noting the Hermitage Stream 'sub-regional scale blue corridor'.
New Forest	The New Forest Local Plan (2016-2036) deals with GI through Policy ENV4: Landscape

⁴⁷ Partnership for Urban South Hampshire (PUSH) was originally formed in 2003 by South Hampshire's urban districts and unitary authorities. In subsequent years, its membership has expanded to

include authorities in the wider region and has been renamed Partnership for South Hampshire (PFSH).

Constituent PFSH authority	Key documents or policies
	<p>character and quality, which requires development to retain and/or enhance GI and distinctive character within settlements.</p> <p>A saved policy in the Local Plan Part 2: Sites and Development Management (2014) is also relevant: Policy DM9: Green Infrastructure linkages. This policy sets out that development proposals should maintain, and where possible enhance, the integrity of the network of green infrastructure within settlements.</p>
Test Valley	<p>The Test Valley Borough Revised Local Plan DPD (2011-2029) addressed GI through Policy E6: Green Infrastructure and references wider projects that form part of the PUSH GI Strategy.</p> <p>The Council has also developed its own Green Infrastructure Strategy (2014) which draws together a range of initiatives, including plans for a South West Hampshire Forest Park in Southern Test Valley, bordering Southampton City and Eastleigh Borough</p>
Winchester	<p>The Winchester District Local Plan Part – Joint Core Strategy (adopted 2013) references the PUSH GI Strategy and addresses GI through dedicated Policy CP15 (Green Infrastructure).</p> <p>Winchester Council also produced its own Green Infrastructure Study in 2010.</p>

Other environmental initiatives

4.23 There are a number of other initiatives relating to the South Hampshire region influence the management of the GBI network.

4.24 The 2017 **Bird Aware Solent – Solent Recreation Mitigation Strategy (SRMS)**⁴⁸ aims to prevent bird disturbance from recreational activities through a series of management measures which encourage more responsible coastal visits. It was prepared by the Solent Recreation Mitigation Partnership of local authorities and conservation bodies.

4.25 Proposed measures include: teams of coastal rangers; communications, marketing and education initiatives; initiatives to encourage responsible dog walking; preparation of codes of conduct; site-specific projects; providing green space alternatives to visiting the coast; and a partnership manager to coordinate.

4.26 Councils in the west of PFSH are also considering the measures needed to mitigate the impacts of recreational disturbance in the New Forest, including the provision of Suitable Alternative Natural Greenspaces, enhanced greenways, and visitor management projects within the New Forest.

4.27 The **Hampshire Countryside Access Plan (2015-2025)**⁴⁹ describes how rights of way and access to the countryside will be managed over the coming years across the County.

4.28 Hampshire County Council are leading on the definition of the county's **Nature Recovery Network**. A summary of the **Hampshire Biodiversity Information Centre (HBIC's) ecological network mapping**⁵⁰ is covered below.

Green infrastructure context

4.29 South Hampshire's strategic network of green infrastructure components is outlined in the 2017 South Hampshire GI Strategy as the sub-region's 'Green Grid'. It is described as not being a barrier to delivering growth and prosperity, but as an '*essential component of the infrastructure required to enable it.*'

4.30 The following section provides a summary of the key components of the GI network in South Hampshire.

4.31 The key defining feature of green and blue infrastructure (GBI) is its 'multifunctionality' i.e. one 'asset' can perform a number of different services.

4.32 With this in mind, in order to analyse the green infrastructure context in South Hampshire, the following four categories have been used to summarise these multiple functions.

4.33 They draw on the national and local policy context outlined above and each one is further detailed below:

- Key function 1: Nature recovery (including the water environment).
- Key function 2: Climate resilience.
- Key function 3: Recreation and access to the countryside.
- Key function 4: Productive landscapes

⁴⁸ Bird Aware Solent (2017), Solent Recreation Mitigation Strategy. Available at: https://birdaware.org/solent/wp-content/uploads/sites/2/2021/10/Solent_Recreation_Mitigation_Strategy.pdf

⁴⁹ Hampshire County Council, Hampshire Countryside Access Plan 2015–2025. Available at: <https://documents.hants.gov.uk/countryside/HampshireCountrysideAccessPlan2015-2025.pdf>

⁵⁰ HBIC (2020), Mapping the Hampshire Ecological Network.

Key function 1: Nature recovery (including the water environment)

4.34 South Hampshire benefits from a wide variety of strategic GI features such as river corridors, country parks, the coast and large tracts of woodland. It also includes smaller scale features such as green spaces, play areas and a network of landscape features such as hedgerows and ponds. Collectively, these make a positive contribution to biodiversity.

4.35 One of the key functions of GBI in South Hampshire is to develop a Nature Recovery Network (NRN), as required by the Environment Act (2021).

4.36 This requires a consideration of legally protected and designated sites. However, it must also consider the protection and expansion of the wider network of habitats which support them (as set out in **Figure 4.1**).

4.37 DEFRA's Nature Recovery Green Paper⁵¹ (sets out the detail for driving nature recovery, including how the government plans to achieve its pledge to protect 30% of UK land and sea for nature by 2030. The outcome of this consultation, which closes in May 2022 will have a bearing on future planning policy.

Hierarchy of designated sites network

4.38 Both statutory and non-statutory designations support the majority of Priority Habitat in Hampshire.

4.39 There are four Special Protection Areas (SPAs), two Special Areas for Conservation and three Ramsar sites within the Solent⁵².

4.40 This area is made up of estuaries and adjacent coastal habitats. They include intertidal flats, saline lagoons, shingle beaches, reefs, saltmarsh, and reedbeds, damp woodland, and grazing marsh. The habitats here support internationally and nationally important numbers of overwintering and breeding bird species – including 10-13% of the world's population of dark-bellied Brent geese and 30% of the UK population.⁵³

4.41 The River Itchen SAC is also located in South Hampshire. The Itchen discharges via Southampton Water into the Solent. The river typifies the classic chalk river and

supports one of the few populations of native freshwater crayfish remaining in the rivers of southern England.

4.42 Adjacent to South Hampshire is the New Forest SAC, SPA and Ramsar Site. Habitats include lowland heath, fen, ancient pasture woodland (including riparian and bog woodland) and a range of acid to neutral grasslands. These habitats support an exceptionally rich bird fauna including internationally important breeding and wintering populations⁵⁴.

4.43 Several Sites of Special Scientific interest (SSSIs) underpin the European site designations. Those that stand alone include Southampton Common SSSI, Botley Woods and Everett's and Mushes Copses SSSI. The River Test SSSI is one of the most species-rich lowland rivers in England.

4.44 Local Nature Reserves (LNRs) allow people access to places with wildlife and geological features of local interest and importance. South Hampshire's LNRs are concentrated in the urban areas between Southampton and Fareham.

4.45 Sites of Importance for Nature Conservation (SINCs) support the biodiversity of the statutorily designated sites.

4.46 The Habitat Regulations Assessment (HRA) of the PUSH Position Statement assesses the potential for impacts on the integrity of European Designated Sites, specifically Ramsar sites, Special Protection Areas (SPAs) and Special Areas of Conservation (SACs). Key potential impacts identified include:⁵⁵

- increased nutrient levels in protected water as a result of increased wastewater treatment discharge;
- risk of habitat fragmentation, with respect to Brent Geese and wading birds;
- recreational disturbance, as a result of developmental pressures; and,
- air quality issues, as a result of increased traffic.

Wider habitat networks in South Hampshire

4.47 The Hampshire Biodiversity Information Centre (HBIC) has created an 'Ecological Networks' map for Hampshire and the Isle of Wight area.⁵⁶

4.48 An ecological network is a group of habitat patches that species can move easily between, maintaining ecological

⁵¹ DEFRA (2022), Nature Recovery Green Paper: Protected Sites and Species. Available at: <https://consult.defra.gov.uk/nature-recovery-green-paper/nature-recovery-green-paper/>

⁵² Including Solent and Southampton Harbour SPA and Ramsar, Portsmouth Harbour SPA and Ramsar, Chichester Harbour & Langstone Harbour SPA Ramsar, Solent and Dorset Coast SPA, Solent Maritime SAC, Solent and Isle of Wight Lagoons SAC

⁵³ Solent Marine Sites (n.d), Solent Marine Sites. Available at: http://www.solentems.org.uk/sems/SEMS_sites/

⁵⁴ Natural England (2014), European Site Conservation Objectives for New Forest SPA (UK9011031). Available at: <http://publications.naturalengland.org.uk/publication/5816333400801280>

⁵⁵ Chichester and Langstone Harbour; Emer Bog; Portsmouth Harbour; River Itchen; Solent and Southampton Water; Solent and Isle of Wight Lagoons; Solent Maritime; Butser Hill; New Forest.

⁵⁶ HBIC (2020), Mapping the Hampshire Ecological Network.

function and conserving biodiversity. **Figure 4.1:** highlights South Hampshire's Ecological Network.

4.49 Network opportunity areas provide opportunities for restoration and re-creation of priority habitats and enable the recovery and enhancement of priority species populations.

4.50 Terrestrial wader and brent goose sites are located on land that falls outside of the Solent SPAs boundaries. This functionally linked land supports the ecological network by providing alternative roosting and foraging sites.

4.51 The Solent Waders and Brent Goose Strategy (SWBGS) aims to protect the network of non-designated terrestrial wader and brent goose sites from land take and recreational pressure associated with new development.⁵⁷

4.52 A framework for guidance on mitigation and off-setting requirements has been prepared by the SWBGS Steering Group. Where on-site avoidance or mitigation measures on Primary or Secondary Support Areas is not possible, provision of new sites should be provided to ensure long term protection and enhancement of the wider wader and brent goose ecological network.⁵⁸

4.53 The guidance also notes the potential for indirect impacts on Brent Geese and wading birds. Consideration should be given to potential impacts from new walking and cycling routes, access to open space, over-shadowing from built development and lighting.

The water environment and nutrient neutrality

4.54 One of the primary pressures on South Hampshire's biodiversity network relates to the water environment. In 2019 the European Court of Justice ruled that any additional nutrient loading to designated sites, which were already in an unfavourable condition, would not be permissible by law.⁵⁹

4.55 Natural England have undertaken several condition assessments at designated sites around the Solent. They have concluded that some qualifying features, such as intertidal mudflat habitat and the wildlife they support are widely in unfavourable condition due to existing levels of nutrients and are therefore at risk from additional nutrient inputs. These nutrient inputs currently mostly come either from agricultural sources or from wastewater from existing housing and other development⁶⁰.

4.56 High levels of nutrients entering the water environment are causing eutrophication, resulting in dense mats of green algae. Eutrophication reduces the oxygen content of water which increases the difficulty of survival for aquatic species and subsequently removes a food source the wading and wintering bird species that reside in the Solent.

4.57 Nutrient neutrality is a concept promoted by Natural England as 'a means of ensuring that development does not add to existing nutrient burdens'.⁶¹ This applies to the area which falls within the catchments of the River Test and River Itchen and their tributaries, which then flow into the Solent.

4.58 Natural England have since published further Advice for development proposals with the potential to affect water quality resulting in adverse nutrient impacts on habitats sites, with updates to their Nutrient Neutrality Methodology and new catchment calculators.⁶² Local Planning Authorities are required to consider the impact of nutrient neutrality before planning permission can be granted.

4.59 The River Test and River Itchen faces numerous pressures from flow diversions, siltation, discharges, agricultural runoff, channel modifications and human impacts associated with the urbanisation alongside much of the river's valley.

4.60 The Test and Itchen River Restoration Strategy is a collaborative project between the Environment Agency, Natural England, local fisheries and riparian owners to achieve favourable condition for the SSSIs and Good Ecological Status under the Water Framework Directive.⁶³

Recreational pressure on biodiversity sites

4.61 HRA work across South Hampshire has identified that development in South Hampshire will have cumulative impacts on the European designated sites within the Solent and the New Forest through increases in recreational pressure. The need to mitigate these impacts is a legal requirement without which new development will be unable to proceed.

4.62 Birds that are disturbed from their natural activities lose valuable feeding time and waste precious energy walking, swimming or flying away. Over 52 million visits are made to the Solent coast each year and new housing will increase this number to 60 million visits per year by 2035.⁶⁴

⁵⁷ SWBGS Steering Group (2020), Solent Waders and Brent Goose Strategy.

⁵⁸ SWBGS Steering Group (2018), Solent Waders and Brent Goose Strategy: Guidance on Mitigation and Off-setting Requirements

⁵⁹ Natural England (June 2020), Advice on achieving nutrient neutrality for new development in the Solent Region – Version 5.

⁶⁰ *ibid*

⁶¹ *ibid*

⁶² Natural England (2022), Advice for development proposals with the potential to affect water quality resulting in adverse nutrient impacts on habitats sites.

⁶³ Environment Agency (April 2013), Test & Itchen River Restoration Strategy: Management Report.

⁶⁴ Bird Aware (n.d), Bird Disturbance. Available at: <https://birdaware.org/solent/bird-disturbance/>

4.63 The Solent Local Authorities formed the Solent Recreation Mitigation Partnership (SRMP) in order to develop a strategy which would help protect the SPAs while continuing to permit residential development.

4.64 Another key area of concern is growing growth and recreational pressure on sensitive habitats and species within the New Forest. Disturbance effects are not the only impacts of visitor pressure. Others include deliberate and accidental fires, litter, predation from people and pets, eutrophication, fly tipping, trampling, traffic-induced air pollution and site management problems.⁶⁵ A number of research reports covering different aspects and locations of recreational pressure in the New Forest National park were published by the National Park Authority in 2020. Following the publication of these research projects, Footprint Ecology were commissioned to undertake additional work relating to the 'zone of influence' of the New Forest's designated sites. This follow-up work defines the catchment area within which new development would have an impact on the designated sites due to visitor pressure: 13.8km. Natural England endorses the conclusions of this and the earlier research reports and supports their use as the best available information.⁶⁶

4.65 Further research by Footprint Ecology found that nearly 130,000 new dwellings may be built within 25km of the New Forest SAC/SPA/Ramsar over the period to 2036. This would represent a 16.4% increase in housing within 25km. The research predicts this would result in an increase of around 11.4% in the number of visits⁶⁷. Several local authorities in and around the New Forest (e.g. Test Valley Borough Council, the New Forest National Park Authority and New Forest District Council) have mitigation strategies in place. For example, the New Forest District (Outside the National Park) Mitigation Strategy for European Sites SPD (2021) gives detailed guidance on mitigation.⁶⁸ Measures include:

- provision of new areas of publicly accessible alternative natural recreational greenspace.
- enhancement of existing greenspace and footpaths/rights of way in all settlements where new residential development takes place.
- access and visitor management.
- monitoring of site condition and visitors.

4.66 Delivery of these mitigation strategies will help to deliver strategic mitigation for biodiversity. Local planning authorities in the New Forest's 'zone of influence' are also working

together to develop a more strategic approach to habitat mitigation. Additional strategic greenspaces could be created by a developer as part of a housing scheme or alternatively will be implemented through the Solent Recreation Mitigation Partnership, which focuses on addressing recreational impacts on the Solent coastal designations. The greenspace provision would need to be of a high quality to provide a realistic alternative to the New Forest.

Key function 2: Climate resilience

4.67 South Hampshire's GBI network plays an important role in creating a landscape which is more resilient to the impacts of climate change.

4.68 Well-designed landscapes and green spaces offer a range of opportunities to store water, modify urban temperatures and provide wider resilience.

4.69 In particular, nature-based solutions (NBS) to the effects of climate change should form an integral part of South Hampshire's strategic GBI network.

4.70 The PUSH Strategic Flood Risk Assessment (which is in the process of being updated)⁶⁹ concluded that the PUSH sub-region is exposed to flood risk from a number of sources. The main threat is flooding from the sea, due to extreme tides. This affects low lying coastlines and as such some of the most populated areas in Portsmouth, Southampton, Gosport, Havant, Fareham, Eastleigh and the New Forest.

4.71 Large areas of the sub-region is also at risk of flooding from rivers and watercourses (fluvial flooding). This is the case along the Rivers Test, Itchen, Hamble, Meon, Wallington and Hermitage Stream. These watercourses pass through existing developed areas. **Figure 4.2:** shows the sub-region's water environment along with the distribution of Flood Zones 2 and 3.

4.72 In addition, a number of areas in Winchester, Test Valley and East Hampshire have been affected by groundwater flooding.

4.73 Robust, strategic GI networks can significantly contribute to reducing flood risk. At a landscape-scale, this can be achieved by thinking and planning on a catchment basis and employing 'upstream thinking'.

4.74 It should also make maximum use of natural flood management (NFM) measures (also referred to as 'working with natural processes' or WWNP). This might include river

⁶⁵ Footprint Ecology (2008), Changing patterns of visitor numbers within the New Forest National Park, with particular reference to the New Forest SPA.

⁶⁶ Footprint Ecology (2021), Discussion and analysis relating to the New Forest SAC/SPA/Ramsar and a zone of influence for recreation.

⁶⁷ Footprint Ecology (April 2020) Recreation use of the New Forest SAC/SPA/Ramsar.

⁶⁸ New Forest District Council (May 2021), Mitigation for Recreational Impacts On New Forest European Sites - Supplementary Planning Document (Enabling the Delivery of Green Growth)

⁶⁹ PUSH (2016). Strategic Flood Risk Assessment - 2016 Update.

naturalisation, improvements to flood plain functionality, the multifunctional use of GI assets, and improvements in land management.

4.75 In addition to flood risk implications, climate change is likely to exacerbate existing problems with water supplies within South Hampshire. This is likely to adversely affect the sub-region's GI unless measures are put in place to improve the resilience of it.

4.76 Climate change presents a challenge for the management of water resources into the future. The increased likelihood of drought necessitates the planning for prolonged and more severe drought periods. Combined with the increased demand for water associated with significant new development, this will increase the potential for water levels to become critically low for both people and nature if not carefully planned.

4.77 Groundwater supply remains important in southern Hampshire, which relies on groundwater from wells or springs for over 50% of supply.

Key function 3: Recreation and access to the countryside

4.78 This section focusses on South Hampshire's GBI network as a wellbeing resource. It assesses at a high level how well both residents and visitors can access the open space and semi-natural space network.

4.79 This network includes recreational routes such as public rights of way and long-distance walking routes. It also includes the heritage features which form part of the wider landscape and help to tell the story of the landscape.

4.80 Access to green spaces has been proven to have a positive influence on a number of health conditions, both physical and mental – as outlined in the 2017 South Hampshire GI Strategy.

4.81 The population of South Hampshire creates considerable demand for recreational opportunities, a demand which will increase as the population grows.⁷⁰

4.82 Within South Hampshire there are notable spatial health inequalities (see **Figure 4.3:**). The provision of a stronger GBI network, carefully planned and prioritised, could help to reduce this inequality.

4.83 A further function of the GBI network in this sense is the boost it can provide to the local visitor economy – which can

be significantly supported by strong provision of GBI for recreational use.

4.84 However, the potential for conflict between this function and the 'nature recovery' function of the GBI network should be acknowledged and managed (see **Key function 1: Nature Recovery**).

4.85 The network of strategic recreation assets as part of South Hampshire's GBI network is illustrated in **Figure 4.4:** and includes:

- The two National Parks.
- A network of eight Country Parks.⁷¹ – the Queen Elizabeth Country Park also lies less than 1km from the north eastern boundary of the study area.
- 11 Registered Parks and Gardens.
- Various National Cycle Network (NCN) Routes, including:
 - Route 2 (A long distance route along the southern coast of England)
 - Route 222 (a long distance route stretching south from London and connecting to the Isle of Wight).
 - Routes 23 and 24 (stretching west toward Bath and passing through central Winchester)
- A network of 110 scheduled monuments.
- A number of waymarked long-distance walking routes, including:
 - The England Coastal Path.
 - The Solent Way: A 60-mile footpath linking Milford on Sea with Emsworth Harbour, largely following the Hampshire coastline.
 - The Test Way: A 44-mile walking route from the chalk downs at Inkpen and following the River Test to Eling.
 - The Wayfarers Way: A 70-mile, route starts high on the chalk downs at Inkpen to finish at Emsworth Harbour.
- An extensive public rights of way (PROW) network.

4.86 Natural England's GI Mapping Tool⁷² helps to highlight which areas of the study area are deficient in access to open

⁷⁰ South Hampshire GI Strategy Implementation Plan (2017)

⁷¹ As per Natural England data set on Country Parks. These parks are: Southampton Common, Lakeside, Itchen Valley, Manor Farm, Holly Hill Woodland Park, The Alver Valley and Staunton. The Lepe

Country Park on the New Forest coast is also located in close proximity to the Study Area.

⁷² Find GI mapping tool at: <https://designatedsites.naturalengland.org.uk/GreenInfrastructure/Map.aspx>

space. **Figure 4.5:** maps access to strategic (sub-regional) scale green space.

4.87 The mapping highlights that there is a deficit of strategic-scale green space (over 500 ha) in the north and centre of the study area, as well as around Portsmouth Harbour. Access is strongest in the west close to the New Forest National Park and Southampton.

4.88 When open space access is overlaid with mapping of socio-economic deprivation, the mapping also highlights deficiencies in the centre of the study area with particular areas of deficiency combined with deprivation in urban areas of Portsmouth.

Key function 4: Productive landscapes

4.89 Finally, food production is one of the ecosystem services provided by South Hampshire's GBI network. It is one which must be balanced with the need for other ecosystem services, including things like water regulation and biodiversity networks.

4.90 The 'best and most versatile land' (BMV) is defined as Grades 1, 2 and 3a by policy guidance. It indicates areas of land which are most flexible, productive and efficient in response to inputs and which can best deliver future crops.

4.91 In South Hampshire, areas of Grade 1 land are concentrated around the River Hamble Valley, to the southeast of the Southampton urban area, parts of the River Meon valley and some areas around the Langstone and North Chichester Harbours.

4.92 Areas of Grade 2 land are found across South Hampshire, including notably surrounding the Fareham urban area.

4.93 Food security is becoming an issue of increasing concern across the UK and appropriate land will be needed to ensure supplies of fresh, locally produced food. However, the evolving policy agenda is placing more emphasis on the need to enhance the functional biodiversity in agroecosystems, as well as ensuring agricultural land plays a stronger role in flood resilience. This will ensure that the need for food production is better balanced with the need for a range of other ecosystem services.

Future opportunities for green infrastructure designation and conservation

4.94 The South Hampshire GI Strategy (2017) highlights a number of strategic GI opportunities. These are shown in an

extract from the 2017 report in **Figure 4.6:**. The opportunities identified are strategic in nature.

'future GI projects would help shape the sub-region and make a significant contribution to the quality of life of the sub-region's communities and to its natural environment.'

4.95 There is strong emphasis within the Implementation Plan 2017 (that accompanies the GI Strategy) on improving access to nature (including significant areas of woodland) in populated areas where there are existing deficits in access to nature. This in turn will help to relieve recreational pressure on the New Forest and Solent Natura 2000 sites.

4.96 Each of the 10 identified Strategic Projects are listed below – each of these is further sub-divided in the Strategy into sub-projects:

- 1. Strategic Recreation Access Network and Capacity Project:** focusing on enhancements to Country Parks, woodlands, and footpath/trail/greenway networks. Includes projects related to the Forest of Bere.⁷³
- 2. Strategic Flood Risk and Water Quality Project:** including river restoration, natural flood management projects, ecological enhancements to coastal habitats, and nutrient neutrality initiatives.
- 3. Strategic Waders and Brent Goose Refuges Mitigation Project:** including coastal park projects, goose refuges and ecological enhancements to estuaries.
- 4. New Forest Strategic GI and European Sites Mitigation Project:** including waterway recreation projects, SANGs and linear parks.
- 5. Havant Thicket Reservoir GI project:** reducing recreational pressure on the coast by providing alternative recreation facilities in easy reach of large urban population.
- 6. Horsea Island Country Park Development Project:** creating 52ha of new strategic-scale green space in Portsmouth, as part of wider regeneration.
- 7. Southsea Seafront:** increasing number of users and reducing recreational disturbance on the Solent SPAs.
- 8. England Coast Path Initiative:** delivering a multi-user coastal route to draw people away from most sensitive areas and provide greater connectivity with the wider recreational network.

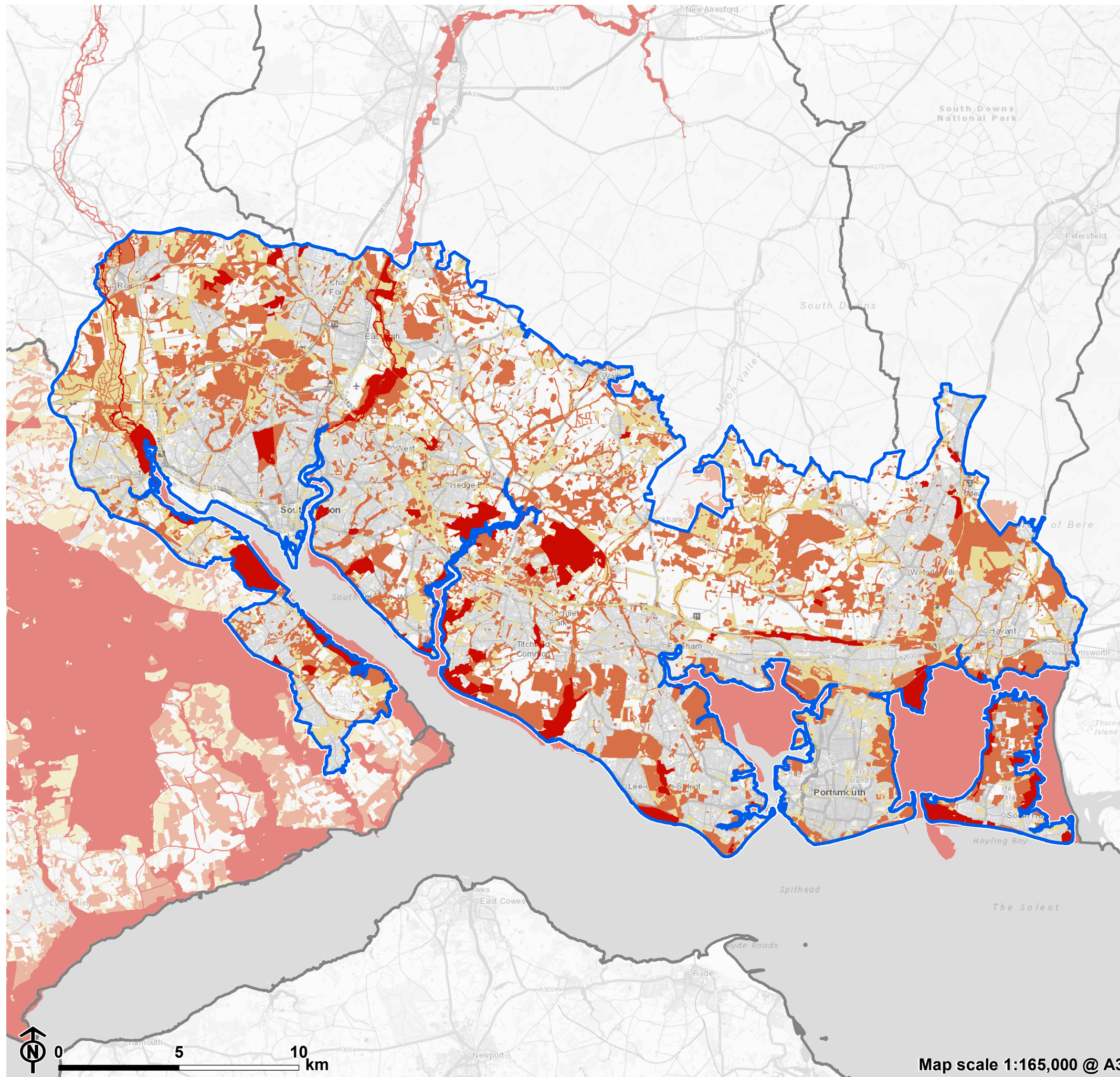
⁷³A Report to the Hampshire and Isle of Wight Wildlife Trust (2010), A Vision for the Forest of Bere.

- 9. Strategic Transport Corridor GI Project:** securing biodiversity benefits and habitat connectivity through vegetated road and rail corridors.
- 10. Greening the Urban Environment Project:** delivery of the myriad of smaller-scale local GI projects to enable the development, regeneration and enhancement of urban areas, while protecting the natural environment.

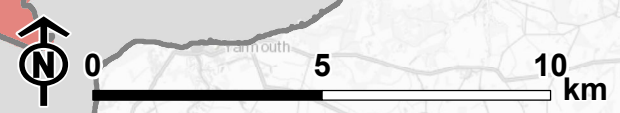
4.97 The 2017 GI Strategy notes that the Local Ecological Network mapped by HBIC (shown in **Figure 4.1:**) will be an important cross-cutting tool in delivering these strategic priorities. It helps to identify evidence-based areas where protection and enhancement will provide the greatest benefits for biodiversity.

4.98 The policy options for proactively conserving and managing these areas are considered in **Chapter 7**.

Figure 4.1: Hampshire's Ecological Network

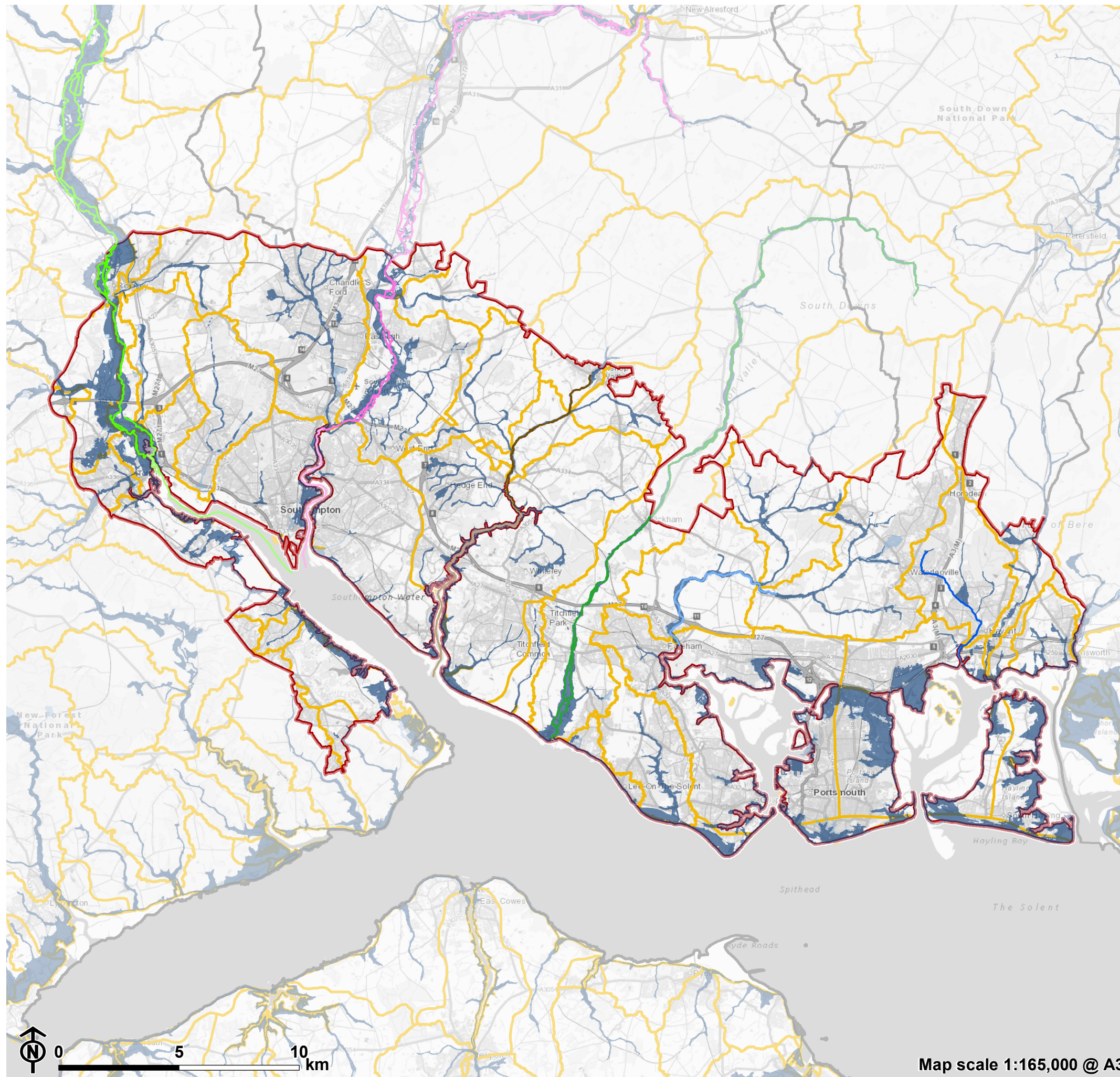


- Study area
- Neighbouring authority
- Core (statutory) sites
- Core (non-statutory) sites
- Network opportunities

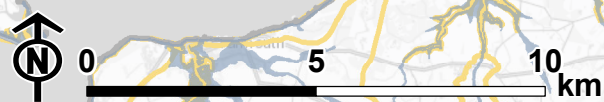


Map scale 1:165,000 @ A3

Figure 4.2: Water Environment and Flood Risk in South Hampshire



- Study area
- Neighbouring authority
- River waterbody catchment
- Flood zone 2
- Flood zone 3
- River Hamble
- River Itchen
- River Meon
- River Test
- River Wallington
- Hermitage Stream



Map scale 1:165,000 @ A3

Figure 4.3: Health deprivation in South Hampshire

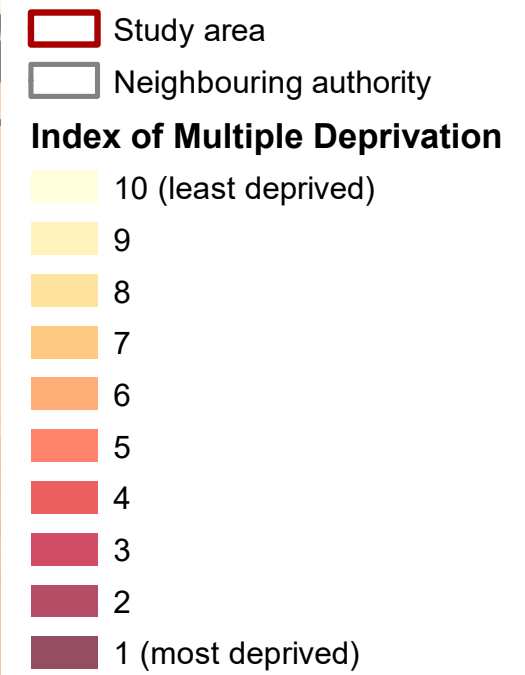
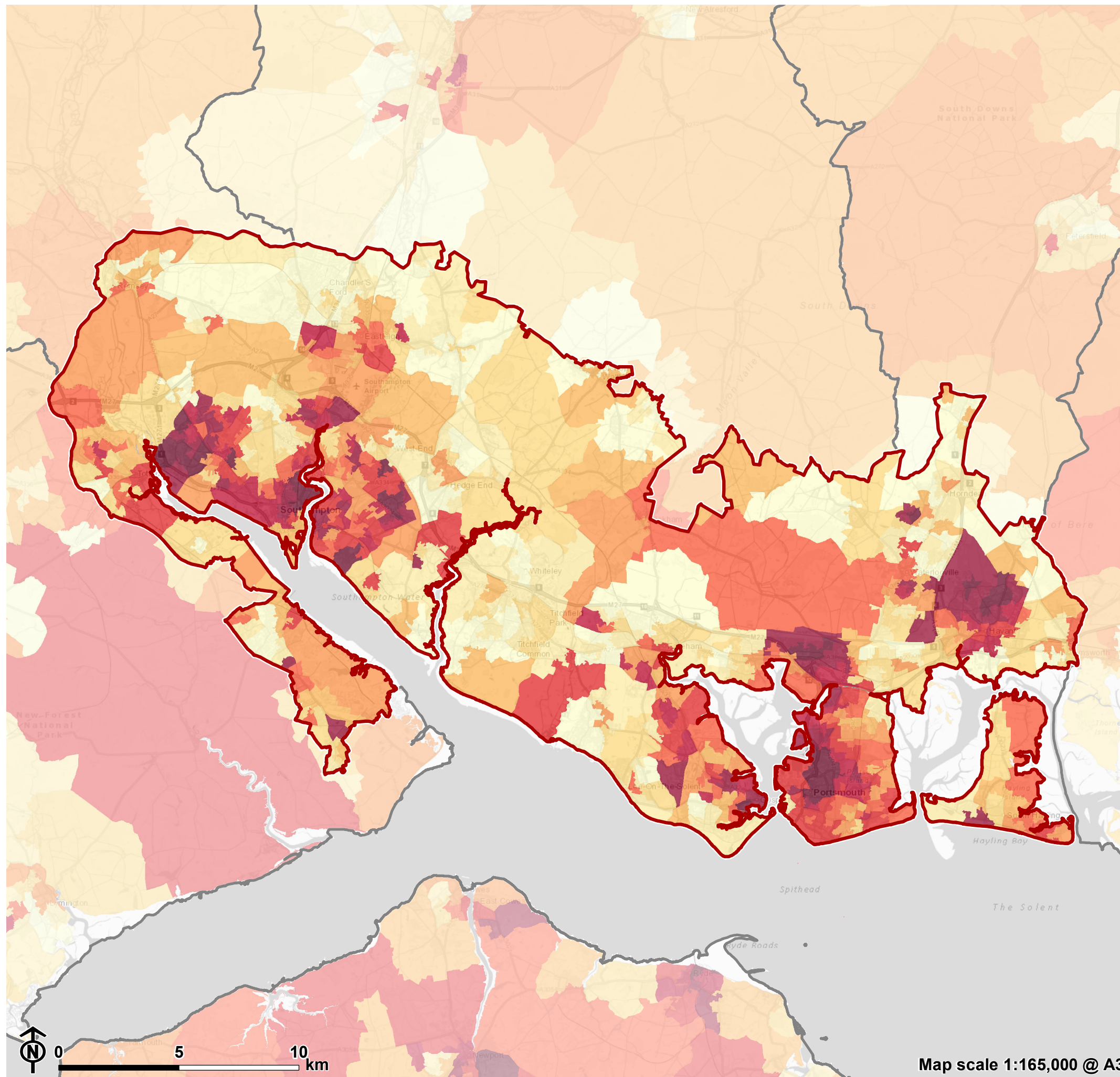
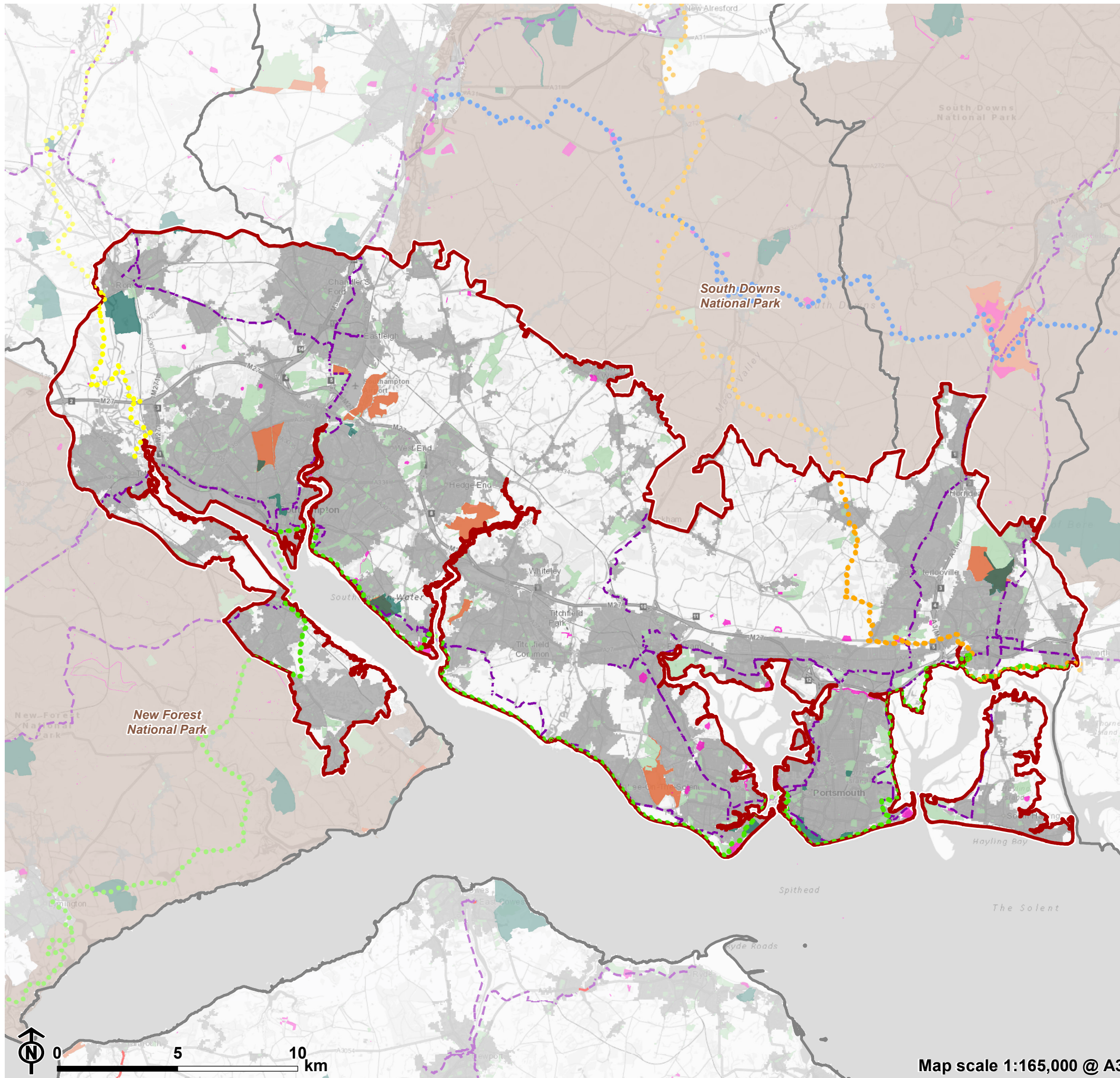
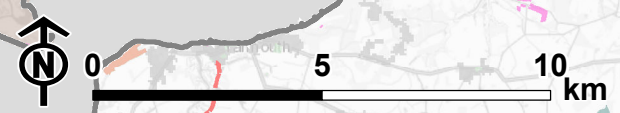


Figure 4.4: Key recreation assets in South Hampshire

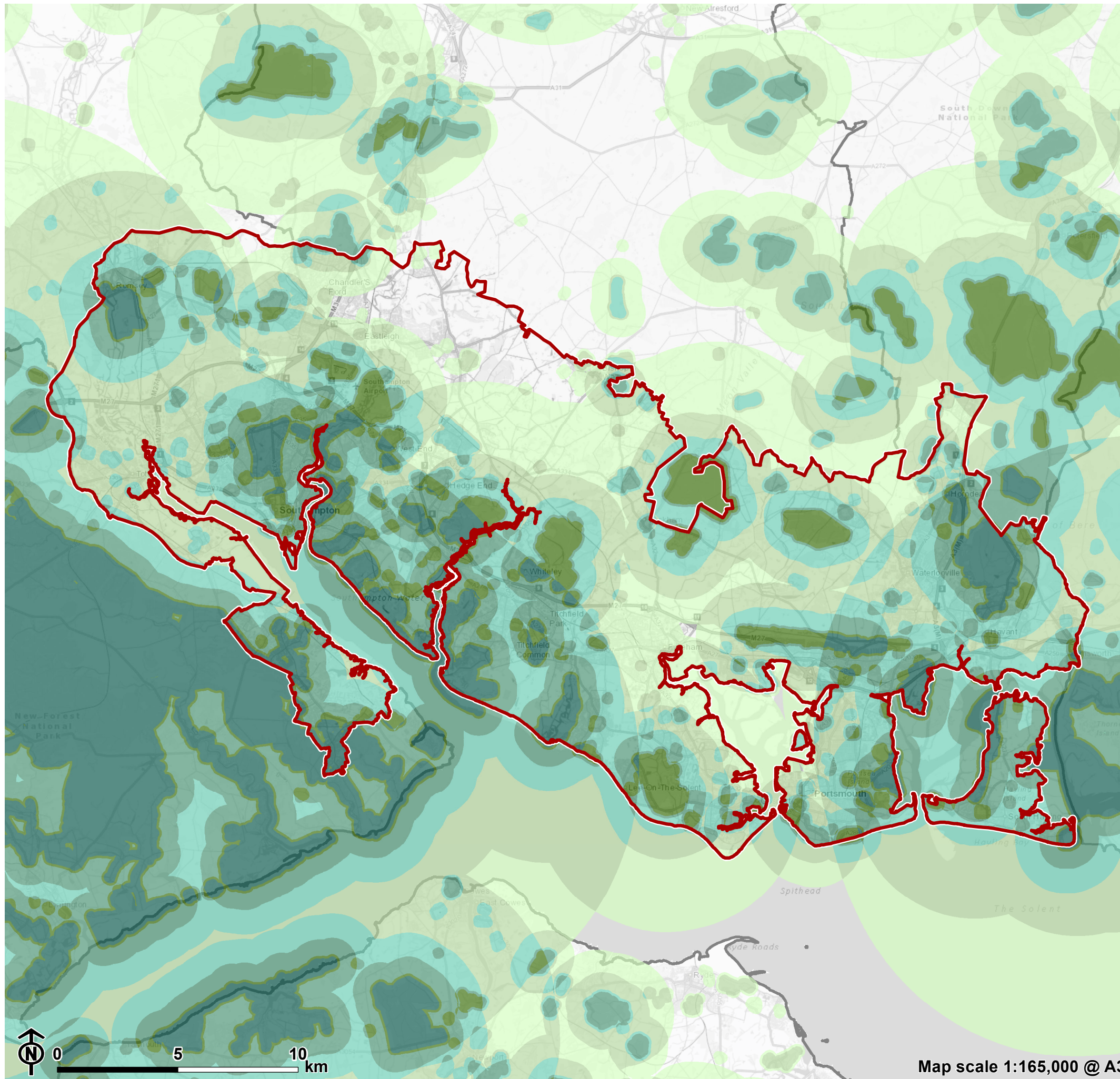


- Study area
- Neighbouring authority
- Built up area
- National Park
- Scheduled monument
- Registered Parks and Gardens
- Country park
- Open space
- National Cycle Network
- Regional Cycle Network
- Long Distance Walking Route**
- Solent Way
- Wayfarers Walk
- Test Way
- National Trail**
- South Downs Way



Map scale 1:165,000 @ A3

Figure 4.5: Access to Natural Green Space Standards (ANGSt) buffer count across South Hampshire



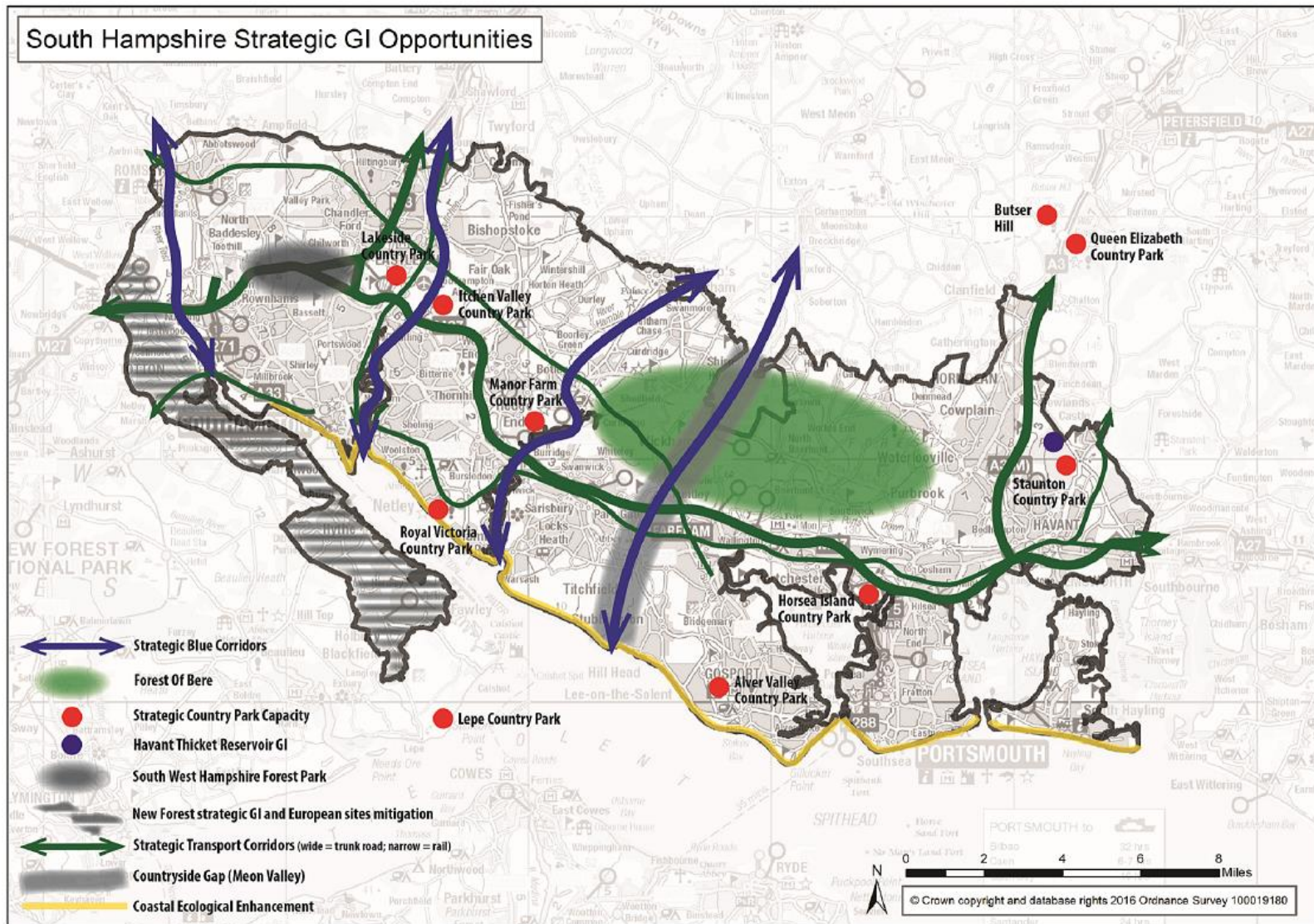
- Study area
- Neighbouring authority

ANGSt Profile*

- 1
- 2
- 3
- 4
- 5
- 6

* Buffers range in scale from short distances for small neighbourhood and local spaces through to significant distances for spaces of sub-regional significance.

Figure 4.6: Strategic GI Opportunities identified within the 2017 South Hampshire GI Strategy



Chapter 5

South Hampshire's Settlement Gaps

5.1 This chapter summarises the potentially important strategic settlement gaps within the PfSH area, and the opportunities to conserve and enhance them. It considers the spatial function of land in relation to settlement separation, which is distinct from consideration of the value of land either in relation to its innate qualities or to its role in enhancing the character/setting of a settlement (see Chapter 6). Land that lacks any particular valued qualities and which doesn't play a role in enhancing settlement character may still perform a role in maintaining separation between settlements.

Definitions of key terms

5.2 The following key terms are used within this chapter (specific sources are indicated in parenthesis):

- **Settlement setting** – the landscape's influence on settlement character/the extent to which a settlement's relationship with the surrounding landscape is important in contributing to its character.
- **Settlement identity** – the physical distinction between settlements i.e. the separate physical integrity of a settlement as distinct from another.

Policy context

National Policy Context

5.3 Protection of existing settlement pattern is not specifically mentioned in the NPPF 2021, nor the associated PPG. However Paragraph 8 of the NPPF sets out three overarching objectives to the planning system, one of which is '*an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land ...*'. The concept of settlement gaps is also broadly consistent with the NPPF, in that: "Strategic policies...should make sufficient provision for ...conservation and enhancement of the natural built and historic environment, including landscapes and green infrastructure" (NPPF paragraph 20) and "Planning policies and decisions should contribute to and enhance the natural and local environment

by...protecting and enhancing valued landscape" (NPPF paragraph 174).

Local Policy Context

5.4 The following **Table 5.1** summarises the adopted and emerging local plan policies and objectives that relate to settlement gaps (relevant area-based policies are shown on **Figure 6.1**)

Table 5.1: Summary of local settlement gap and separation policies

Constituent PfSH authority	Key documents or policies
Southampton	Southampton Core Strategy (partial review March 2015) Policy CS 21: 'Protecting and enhancing open space' is concerned with protecting strategic gaps between Southampton and settlements in neighbouring authorities.
Eastleigh	Eastleigh Borough Local Plan 2016-2036 (2022) Strategic policy S6: 'Protection of settlement gaps' is concerned with maintaining the separate identity of settlements and separation from Southampton and protecting the openness of the gap and character of the countryside.
East Hampshire	East Hampshire Joint Core Strategy (2014) Policy CP23: 'Gaps between settlements' is concerned with protecting the generally open and undeveloped nature of gaps between settlements to prevent coalescence and retain their separate identity.
Fareham	Fareham Core Strategy (2011) Policy CS22: 'Development in Strategic Gaps' is concerned with maintaining the settlement pattern, keeping individual settlements separate and providing opportunities for green infrastructure/green corridors.
	Emerging Fareham Local Plan 2037 (2021) Strategic Policy DS2: 'Development in Strategic Gaps' is concerned with protecting the integrity of gaps and the physical and visual separation of settlements or the distinctive nature of settlement characters.
Gosport	Gosport Local Plan 2011-2019 (2015) Policy LP3: 'Spatial Strategy' (proposed to be retained in emerging Local Plan 2038 Policy D2: 'Development Strategy') is concerned with preserving the character and function of settlement gaps between Gosport/Fareham and Lee-on-the-Solent/Stubbington.
Havant	Havant Allocations Plan (2014) Policy AL2 'Urban Area Boundaries and Undeveloped Gaps between Settlements' protects the undeveloped gaps between the urban area boundaries of Waterlooville, Leigh Park, Havant, Emsworth; together with the undeveloped gaps between

Constituent PfSH authority	Key documents or policies
	them and neighbouring boundaries with Portsmouth, Winchester, East Hampshire and Chichester.
Test Valley	Test Valley Revised Local Plan DPD 2011 – 2029 (2016) Policy E3: 'Local Gaps' is concerned with preserving the physical and/or visual separation between settlements and protecting the integrity of the gaps.
Winchester	Winchester Local Plan Part 1: Joint Core Strategy (2013) Policy CP18: 'Settlement Gaps' aims to retain the generally open and undeveloped nature and rural character of the defined settlement gaps and protect the individual character and identity of those settlements.

Context

Related designations

5.5 There are a number of existing designations within the PfSH area which, whilst not specifically related to preserving settlement gaps, may in some cases contribute to this. These designations are primarily related to access, recreation, cultural heritage or ecology value, and include Registered Parks and Gardens, Open Access Land (Common Land and CRoW Act Land), Country Parks, and Nature Conservation designations, as shown on **Figure 6.2**).

Evidence base documents

5.6 The following evidence base documents have been produced at a District/Borough-level that are relevant to this project, as follows:

- The Eastleigh Borough Settlement Gap Study (October 2020) assessed the characteristics of the nine identified Settlement Gaps with the aim of identifying which areas should continue to be protected. This has led to the final settlement gap designations on the adopted policies map (2022).
- The Technical Review of Areas of Special Landscape Quality and Strategic Gaps, supporting document for the Fareham Local Plan (September 2020) reviewed the two proposed 'Strategic Countryside Gaps'. It concluded that both the 'Meon Gap' and the 'Fareham-Stubbington Gap' both have a clear role in preventing settlement coalescence due to continued pressure from expansion of adjacent urban areas. For the latter, the report also added that *"there are some opportunities for development to be accommodated within the landscape, without compromising the Strategic Gaps function"*.

- The Test Valley Topic Paper Policy E3 Local Gaps (2014) reviewed the local gap designations and concluded that they were all '*considered justified*'.

Key settlement gaps

From existing policy

5.7 As set out above, seven of the 10 local authority areas have settlement gap policies. The following gaps are identified within the PFSH area (shown on **Figure 6.1**):

- Eastleigh:
 - Hedge End, Horton Heath and Boorley Green.
 - Eastleigh and Southampton.
 - Eastleigh – Bishopstoke.
 - Fair Oak and Horton Heath.
 - Hedge End, Botley and Boorley Green.
 - Hedge End, West End and Southampton.
 - Hedge End and Bursledon.
 - Bursledon, Netley and Southampton.
 - Hamble, Netley and Bursledon.
- East Hampshire:
 - Havant / Rowlands Castle.
 - Havant /Waterlooville.
 - Horndean / Blendworth.
 - Horndean / Catherington / Clanfield.
 - Clanfield / Old Clanfield
- Fareham:
 - Fareham/Stubbington and the Western Wards (Meon Gap).
 - Fareham/Bridgemary and Stubbington/Lee-on-the-Solent (Fareham - Stubbington Strategic Gap).
- Gosport:
 - Gosport / Fareham.
 - Lee-on-the-Solent / Stubbington.
- Test Valley:
 - Romsey – North Baddesley Local Gap.
 - North Baddesley – Chilworth Local Gap.
 - North Baddesley – Valley park Local Gap.
 - Southampton – Eastleigh Local Gap.

- Ampfield – Chandlers Ford Local Gap.

- Southampton:

- Southampton and Eastleigh.
- Southampton and Hedge End / Bursledon / Netley.

- Winchester:

- Bishop's Waltham – Swanmore – Waltham Chase – Shedfield – Shirrell Heath.
- Denmead – Waterlooville.
- Welborne – Wickham.
- Whiteley – Fareham/Fareham Western Wards (the 'Meon Gap').

Spatial function

5.8 A high-level analysis of the spatial function of the existing gaps shows that the strategic gaps separating Southampton from adjacent settlements to the north, east and south-east are particularly narrow in relation to the size of Southampton and therefore relatively fragile, albeit with those to the north and east (between Southampton and Eastleigh and Southampton/West End and Hedge End) featuring significant separating features (including the M27).

5.9 The policy options for proactively protecting these gaps are considered in **Chapter 7**.

Chapter 6

South Hampshire's Landscape Character

6.1 This chapter summarises the landscape context of the PfSH area at a strategic scale. It sets out areas of potentially higher landscape value, including where landscape setting may influence the character of settlements, and the opportunities to conserve and enhance them.

Definitions of key terms

6.2 The following key terms are used within this chapter (specific sources are indicated in parenthesis):

- **Landscape** – An area as perceived by people whose character is the result of the action and interaction of natural and/or human factors (European Landscape Convention (ELC)⁷⁴).
- **Landscape qualities** – characteristics/features of a landscape that have been identified as being valued (Landscape Institute's Technical Guidance Note (TGN) 02/21⁷⁵).
- **Landscape value** – the relative value or importance attached to different landscapes by society on account of their landscape qualities (TGN 02/21).
- **'Above ordinary' landscape value** – this terminology reflects the definition of a 'valued landscape' used in TGN 02/21, which is '*an area identified as having sufficient landscape qualities to elevate it above other more everyday landscapes*'.
- **Landscape characteristics** – elements, or combinations of elements, which make a particular contribution to distinctive character (An Approach to Landscape Character Assessment⁷⁶).
- **Landscape policy** – an expression by the competent public authorities of general principles, strategies and guidelines that permit the taking of specific measures aimed at the protection, management and planning of landscapes (ELC).

⁷⁴ Council of Europe (2004) the European Landscape Convention, European Treaty Series - No. 17.

⁷⁵ Landscape Institute (2021) Technical Guidance Note (TGN) 02/21, Assessing landscape value outside national designations,

⁷⁶ Natural England (2014) An Approach to Landscape Character Assessment

- **Landscape protection** – actions to conserve and maintain the significant or characteristic features of a landscape, justified by its heritage value derived from its natural configuration and/or from human activity (ELC).
- **Landscape qualities** – those aspects of the area's natural beauty, wildlife and cultural heritage, which make the area distinctive and are valuable. These are usually referred to as 'special qualities' and are a statutory expression used in relation to nationally designated landscapes (Guidance for assessing landscapes for designation as National Park or Area of Outstanding Natural Beauty in England⁷⁷).
- **Settlement setting** – the landscape's influence on settlement character/the extent to which a settlement's relationship with the surrounding landscape is important in contributing to its character.
- **Settlement identity** – the physical distinction between settlements i.e. the separate physical integrity of a settlement as distinct from another.

International, national and local policy context

International Policy Context

6.3 The European Landscape Convention (ELC) came into force in the UK in March 2007.⁷⁸ It established the need to recognise landscape in law; to develop landscape policies dedicated to the protection, management and planning of landscapes; and to establish procedures for the participation of the general public and other stakeholders in the creation and implementation of landscape policies.

6.4 The ELC defines 'landscape' as 'an area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors'. This recognises that all landscapes matter, be they ordinary, degraded or outstanding.

National Policy Context

6.5 Paragraph 8 of the NPPF sets out three overarching objectives to the planning system, one of which is '*an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land ...*'.

6.6 At paragraph 130(c) the NPPF states that '*Planning policies and decisions should ensure that developments: ...*

are sympathetic to local character and history, including the surrounding built environment and landscape setting ...'.

6.7 At Paragraph 174 the NPPF is explicit in its requirement for development plan policies to protect, and where appropriate enhance, the landscape, stating that '*planning policies and decisions should contribute to and enhance the natural and local environment by: a) protecting and enhancing valued landscapes' ... (in a manner commensurate with their statutory status or identified quality) and 'b) recognising the intrinsic character and beauty of the countryside ...*'.

6.8 Paragraph 175 goes on to say that plans should '*distinguish between the hierarchy of international, national and locally designated sites*', with Paragraph 176 adding that '*great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks ... and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues... development within their [National Parks & AONBs] setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas*'. Relevant bodies – including neighbouring planning authorities – also have a statutory 'duty of regard' under Section 62(2) of the Environment Act 1995 to consider the statutory National Park purposes in exercising any function that could affect the National Park. This includes the consideration of development proposals close to their boundaries.

Local Policy Context

6.9 The following **Table 6.1** summarises the adopted and emerging local plan policies and objectives that relate to landscape qualities/value, including settlement setting (relevant area-based policies are shown on **Figure 6.1**).

Table 6.1: Summary of local landscape policies

Constituent PfSH authority	Key documents or policies
Portsmouth	<p>Portsmouth Core Strategy (January 2012) relevant policies include:</p> <ul style="list-style-type: none"> ■ Policy CM8 'Portsdown Hill' is concerned maintaining the landscape value of the hill. This is also carried forward in Policy S9 of the emerging Portsmouth Local Plan (September 2021). The latter describes the hill as providing 'a backdrop to the city's skyline and stunning views out over the city, Solent and the surrounding countryside'

⁷⁷ Natural England (2011) Guidance for assessing landscapes for designation as National Park or Area of Outstanding Natural Beauty in England.

⁷⁸ The ELC is a convention of the Council of Europe, not the EU. Therefore, Brexit does not affect the status of this convention, and as of 31 January 2020, the UK remains a signatory.

Constituent PFSH authority	Key documents or policies
	<p>and as being 'a key feature of the landscape that forms part of the city's identity'.</p> <ul style="list-style-type: none"> Policy PH1 'Portsmouth Harbour Coastal Zone' and LH2 'Langstone Harbour Coastal Zone' are concerned with, amongst other things, protecting the coastal setting and landscape of the respective harbours. This is also carried forward in Policy S10 'Coastal Zone' of the emerging Portsmouth Local Plan (September 2021), which refers to the 'preservation of the character of the open coastal zone'.
Eastleigh	The Eastleigh Local Plan (2022) Policy S7 'New development in the countryside' requires development to avoid adverse landscape impact on areas adjoining national parks and their settings.
East Hampshire	East Hampshire Joint Core Strategy (2014) Policy CP20: 'Landscape' is concerned with conserving and enhancing the natural beauty, tranquillity, wildlife and cultural heritage of the South Downs National Park (SDNP) and its setting.
Fareham	<p>Fareham Core Strategy (2011) Policy CS7: 'Development in Fareham' is concerned with protecting the setting and landscape character of the town.</p> <p>Emerging Fareham Local Plan 2037 (June 2021) Strategic Policy DS3: 'Landscape' identifies 'Areas of Special Landscape Quality' (ASLQ) and aims to protect and enhance the landscape and have regard to their intrinsic landscape character, quality and important features; visual setting; and the landscape as a setting for settlements.</p>
Gosport	Gosport Local Plan 2011-2019 (2015) Policy DP10 (d & e) is concerned with protecting important townscape and landscape features including within the historic environment. Key features are identified in the Council's Townscape Assessment (2013)
Havant	Havant Borough Core Strategy (2011) Policy CS12: 'Chichester Harbour Area of Outstanding Natural Beauty (AONB)' is concerned with impacts on the Chichester Harbour AONB and its setting. In addition, Policy DM8 and DM9 reference the importance of landscape distinctiveness and define the extent of the coastal zone within the Borough, respectively.

Constituent PFSH authority	Key documents or policies
New Forest	<p>New Forest District Local Plan 2016-2036 Part One: Planning Strategy (July 2020) relevant policies include:</p> <ul style="list-style-type: none"> Strategic Objective SO1: 'Landscape and the countryside' – is concerned with safeguarding and enhancing the special qualities and landscape character of the Plan Area, including the Solent coastline. Strategic Objective SO3: 'Built environment and heritage' – is concerned with ensuring valued local character and distinctiveness is maintained and that new development is appropriate to its context and landscape setting. Policy STR 22: 'Protection of the countryside, Cranborne Chase Area of Outstanding Natural Beauty and the adjoining New Forest National Park' – is concerned with protecting the special qualities of the adjoining New Forest National Park (NFNP) and its setting, including character, quality and scenic beauty. Policy ENV 4: 'Landscape character and quality' – is concerned with protecting and enhancing identified landscape features and characteristics, including the landscape setting of settlements; important or locally distinctive views, topographical features and skylines; and areas of tranquillity. The Policies Map identifies some features of local landscape value relevant to the application of Policy ENV4 (identified in saved policy DW-E12), but these not exhaustive and predominantly comprise discreet areas of woodland.
Southampton	Given the urban nature of the city, there are no specific landscape designations, although more broadly there are policies to protect open spaces.
Test Valley	The Test Valley Borough Revised Local Plan DPD (2011-2029) Policy E2 'Protect, Conserve and Enhance the Landscape Character of the Borough' is concerned with the protection, conservation and enhancement of the Borough's landscape.

Constituent PFSH authority	Key documents or policies
Winchester	<p>Adopted Winchester Local Plan Part 1: Joint Core Strategy (2013):</p> <ul style="list-style-type: none"> Policy CP19: 'South Downs National Park' is concerned with the context and setting of the SDNP, including protecting the rural character and setting of settlements. Policy CP20: 'Heritage and Landscape Character' is concerned with the conservation of character. Policy MTRA4: 'Development in the Countryside' is concerned with the management of development in the open countryside.

6.10 In addition, all 10 of the individual local planning authorities within the Study area have local plan policies related to the protection of the countryside/open land. However, these are spatial policies concerned predominantly with the control of development outside of the existing settlement boundaries/urban areas, rather than landscape qualities or value.

Landscape context

6.11 The underlying geology has a profound influence of the character of the landscape of South Hampshire, influencing topography, soils, vegetation and hydrology, as well as building styles and vernacular. The context of the PFSH area comprises two main geological areas: chalk forming the characteristic hills, scarps and downland of the South Downs to the north; and softer clays and sands covering the majority of the area, forming the Hampshire Lowlands and Coastal Plain. The chalk forms a watershed, with land within the PFSH area draining south into the Solent. A number of major river valleys landscapes cross the area north-south, including that of the River Meon, River Test, River Itchen and River Hamble.

6.12 These broad divisions are reflected in the National Character Areas, the Character Areas identified within the Hampshire Historic Landscape Assessment and the county level Landscape Character Areas, as set out below.

Landscape designations

6.13 There are a number of existing landscape-related designations within the PFSH area, including Registered Parks and Gardens, Open Access Land (Common Land and CRoW Act Land), Country Parks, and Nature Conservation designations, as shown on **Figure 6.2**). Whilst none of these designations actually require landscape to have innate quality (i.e. they are related to access, recreation, cultural heritage or ecology value), they can contribute to landscape qualities/value.

6.14 In addition, the study area is largely contained to the north by the SDNP, to the west by the NFNP and to the east by Chichester Harbour Area of Outstanding Natural Beauty (AONB). Under primary legislation and the NPPF (2021), relevant authorities are required to have regard to the statutory National Park and AONB purposes in exercising their functions; and also consider the setting of the nationally protected landscapes in their planning decisions. The management plans for these nationally designated landscapes have policies related to protecting setting, as follows:

- Policy 1 of the SDNP Partnership Management Plan 2020 – 2025 aims to 'Conserve and enhance the natural beauty and special qualities of the landscape and its setting...'
- The New Forest National Park Partnership Plan 2022-2027 highlights the importance of partners working together to deliver the statutory National Park purposes and the agenda set by the Government for National Parks to lead nature recovery and the delivery of nature-based solutions to climate change.
- Policy 2 of the Chichester Harbour AONB Management Plan 2019-2024 states that '... Development outside of the Area of Outstanding Natural Beauty, but sufficiently close to the boundary, will not detrimentally impact the character and setting of the protected landscape'.

Landscape character

National level

6.15 The PFSH area is primarily located across three National Character Areas (NCAs), which extend east-west reflecting the underlying geology (as shown on **Figure 6.3**). These are (from north to south) NCA 125 'The South Downs', NCA 128 'South Hampshire Lowlands'⁷⁹, and NCA 126 'South Coast Plain'⁸⁰. A small part of the area to the west of the Solent also lies within NCA 131 'New Forest'. A similar division is

⁷⁹ Natural England (2013) NCA Profile:128 South Hampshire Lowlands. Available at: file:///C:/Users/hope_d/Downloads/128%20South%20Hampshire%20Lowlands.pdf

⁸⁰ Natural England (2014) NCA Profile:126 South Coast Plain. Available at: file:///C:/Users/hope_d/Downloads/126%20South%20Coast%20Plain.pdf

identified in the Hampshire Historic Landscape Assessment (HLA)⁸¹, where four Character Areas fall within the PfSH area: 7: 'South Hampshire Lowland and Heath'; 9: 'New Forest Coast'; 10: 'South Hampshire Coast'; and 11: 'Avon, Test, Itchen and Meon River Valleys'.

County level

6.16 'The Hampshire County Integrated Character Assessment - Landscape, townscape and seascape assessment for Hampshire' (2010)⁸² identifies 19 Landscape Character Areas (LCA) that are located within, or partly within, the PfSH area (as shown on **Figure 6.3**).

6.17 The assessment sets out a number of 'Key Qualities' for each LCA. Those LCAs with key qualities suggestive of higher landscape value (and which could potentially be considered as having 'above ordinary' landscape value) and/or that indicate the landscape setting that may have an important role in defining the character of settlements, are described in more detail below.

District/Borough level

6.18 District/Borough-level Landscape/Townscape Character Assessments have also been produced for all of the authorities in the PfSH area as listed below. However, these assessments have all been undertaken at varying times (from 2000 to 2021), at varying scales and using differing methodologies.

- Landscape character assessment for Eastleigh Borough (December 2011).
- East Hampshire District Landscape Character Assessment (July 2006).
- Fareham Landscape Character Assessment (2017).
- Gosport's Townscape: A Townscape Assessment of the Borough of Gosport (2013).
- Havant Borough Townscape, Landscape and Seascape Character Assessment (February 2007).
- New Forest District Landscape Character Assessment (July 2000).
- Portsmouth City Council Urban Characterisation Study (March 2011) and Landscape Character Assessment - Portsea Island Coastal Defence Flood Risk Areas (2012).

- Southampton City Council City Centre Characterisation Appraisal (January 2009).
- Test Valley Borough Landscape Character Assessment (2018).
- Winchester City Council Landscape Character Assessment (March 2022).

Other landscape-related evidence base documents

6.19 A number of other landscape-related evidence base documents have also been produced at a District/Borough-level that are relevant to this project, as follows:

- Landscape Assessment Study Of Landscape Sensitivity And Capacity And The Value Of The Undeveloped Land In Havant (May 2015) – assessed the value and capacity of land parcels within LCAs of the Havant Borough Landscape, Townscape and Seascape Landscape Character Assessment (2007). Concluded that the majority of parcels assessed as having Medium landscape value, with several parcels assessed as having Medium-High to High value ratings as follows:
 - Land parcel 12.1 (County LCA - 'Portsdown Hill and Open Downs') – Medium/High.
 - Land parcels 20.1, 20.2 and 20.3 (County LCA - 'Forest of Bere East') - Medium/High.
 - Land parcels 26.1, 26.2, 26.3, 26.4, 26.5 and 26.6 (County LCA - 'Havant and Emsworth Coastal Plain') – Medium/High.
 - Land parcels 29.1, 29.2 and 29.3 (County LCA - 'Hayling Island Coastal Plain') – Medium/High - High.
 - Land parcels 34.2 (County LCA - 'Hayling Island Coastal Plain') – Medium/High.
 - Land parcels 35.1, 35.2 (County LCA - 'Hayling Island Coastal Plain') – Medium/High.
 - Land parcels 36.2 (County LCA - 'Hayling Island Coastal Plain') – Medium/High.
 - Land parcels 41.3 (County LCA - 'Havant and Emsworth Coastal Plain') – Medium/High.
- The Technical Review of Areas of Special Landscape Quality and Strategic Gaps, supporting document for the Fareham Local Plan (September 2020) reviewed the six

⁸¹ Scott Wilson, Oxford Archaeology (South) (2013) Hampshire Historic Landscape Characterisation (HLC) [data-set]. York: Archaeology Data Service [distributor] <https://doi.org/10.5284/1019864>

⁸² Hampshire County Council (2010) Hampshire Integrated Character Assessment: Landscape, townscape and seascape assessment for Hampshire. Available at: <https://www.hants.gov.uk/landplanningandenvironment/environment/landscape/integratedcharacterassessment#step-3>

proposed ASLQs. It concluded that all six of the proposed ASLQ *'can be considered as 'valued landscapes''* and that *'two further landscape character areas ... were identified as having equivalently 'valued landscape' characteristics and so ... should also be designated'*.

Key areas of landscape value

Areas of potential higher landscape value

From existing policy

6.20 The emerging Fareham Local Plan Strategic Policy DS3 proposes a number of Areas of Special Landscape Quality (ASLQ). A Technical Review (2020)⁸³ concluded that all six of the proposed ASLQ *'can be considered as 'valued landscapes''* and that *'two further landscape character areas ... were identified as having equivalently 'valued landscape' characteristics and so ... should also be designated'*. The six proposed ASLQs and two further areas are shown on **Figure 6.1** and include:

- Meon Valley;
- Portsdown Hill;
- Forest of Bere;
- Hook Valley;
- Lower Hamble Valley;
- Upper Hamble Valley;
- Chilling-Brownwich Coastal Plain; and,
- parts of the Cams to Portchester Coast.

6.21 Note this is a proposed policy in the Submitted Local Plan but has yet to be adopted.

From other evidence base

6.22 The following LCAs from 'The Hampshire County Integrated Character Assessment (2010) have 'Key Qualities' (summarised in parenthesis) which suggest the landscape, or parts of the landscape, may have a higher landscape value and could potentially be considered as having 'above ordinary' landscape value (shown on **Figure 6.3**):

- LCA 2e 'Forest of Bere West' and LCA 2f 'Forest of Bere East' (remnant areas of Forest of Bere; traditional settlement pattern; high proportion of semi-natural habitats; local countryside to large centres of population). A small part of LCA 2f are also consistent

with the 'Lower Hamble Valley' ASLQ in Fareham District.

- LCA 3b 'Test Valley' (ecologically-rich floodplain with a tranquil, intimate and traditional character; valley sides often have long, open views with pockets of ancient semi-natural woodland; diverse range of settlement types).
- LCA3c 'Itchen Valley' (distinctive pattern of settlements within river landscapes; high quality built heritage; designed landscapes and nationally important watermeadows; internationally important chalk stream and nationally important flood plain habitat; valley setting and high tranquillity close to settlement).
- LCA3d 'Hamble Valley' (rich maritime heritage; attractive waterside settlements; wealth of high quality waterside access; classic chalk stream flora and internationally important coastal habitat; strongly nucleated settlement pattern – quality of the built heritage recognised by the concentration of conservation areas). Parts of this LCA are also consistent with the 'Lower Hamble Valley' ASLQ in Fareham District.
- LCA 3e 'Meon Valley' (chalk stream valley character area with varied settings from coast to wooded lowland to the Down; wide variety of forms and periods of enclosure and in particular the surviving influences of watermeadows; classic chalk stream flora and internationally important coastal habitat associated with Solent areas). Parts of this LCA are also consistent with the 'Meon Valley' ASLQ in Fareham District.
- LCA 7h 'South East Hampshire Downs' (A wide variety of historic landscapes which are distinctly visible as a series of east- west bands; significant areas of semi-natural habitat including semi natural ancient woodland and downland; variety of experiences of enclosure, including wooded and treed hedged landscapes in the south.
- LCA 8i 'Portsdown Hill and Open Downs' (ridge landform fundamental to controlling the spread of development from the coastal plain, and has helped retain the remote and unspoilt feel of the Forest of Bere to the north; nationally important chalk grassland; 'doorstep' countryside to a large urban population, with unrivalled extensive and expansive views). Parts of this LCA are also consistent with the 'Portsdown Hill' and 'Forest of Bere' ASLQ in Fareham District and the area protected under Policy CM8 'Portsdown Hill' of the Portsmouth Plan (2012).

⁸³ Hampshire County Council Landscape Tea (September 2020) Technical Review of Areas of Special Landscape Quality and

Strategic Gaps, supporting document for Fareham Local Plan Development

- LCA 9c 'New Forest Waterside' (biodiversity interest concentrated on the strategic undeveloped coastal fringes; coastline has a predominantly natural edge along Southampton water – important to the setting of the New Forest backdrop when viewed from the east; coastal edge which is relatively remote, inaccessible and often open in character, whilst inland areas contain remnant ancient enclosures, treed hedges, small ancient woodlands, lanes, and footpaths leading to the New Forest).
- LCA 9e 'Chilling Coastal Plain & Locks Heath Common' (the most extensive area of rural coastal plain landscape East of Southampton water; internationally important intertidal habitats; rural, relatively undeveloped coastal fringe which has an abundance of access opportunities). The southern part of this LCA is also consistent with the 'Chilling and Brownwich' and 'Hook Valley' ASLQ in Fareham District.
- LCA 10a 'Langstone and Chichester Harbours' (internationally important marine intertidal habitat; overall sense of wilderness and high degree of natural beauty; one of the most important areas for water recreation in the country). This LCA is also largely consistent with the area protected under Policy LH2 'Langstone Harbour Coastal Zone' of the Portsmouth Plan (2012) and under Policy DM9 'Development in Coastal Zone' in the Havant Core Strategy (2011).
- LCA 10b 'Portsmouth Harbour' (currently no assessment available). Likely to be valued for internationally important marine intertidal habitat; rich maritime history, including nationally important naval history associations; concentration of built heritage; setting for adjacent settlements, including Portsmouth and Gosport. This LCA is also largely consistent with the area protected under Policy PH1 'Portsmouth Harbour Coastal Zone' of the Portsmouth Plan (2012).

Settlement setting

From existing policy

6.23 As noted above, there are a number of references to protecting the landscape setting of settlements in local plan policies, including Policy ENV 4 of the adopted New Forest District Local Plan (July 2020), Policy CM8 of the adopted Portsmouth Core Strategy (January 2012), Policy CP19 of the adopted Winchester Local Plan (2013), and Policy CS7 of the emerging Fareham Local Plan 2037 (June 2021).

6.24 In addition, a number of the Settlement Gap policies also refer to maintaining/protecting the separate identity of settlements (i.e. their separate physical integrity). Some policies also go further: Strategic Policy DS2 of the emerging Fareham Local Plan 2037 (June 2021) refers to protecting 'the distinctive nature of settlement characters', and Policy CP18: 'Settlement Gaps' of the adopted Winchester Local Plan (2013) refers to protecting the 'individual character and identity of ... settlements'. These are described in the settlement gap section below.

From other evidence base

6.25 Within the Hampshire County Integrated Character Assessment (2010) there are also some indicators of where LCAs provide a landscape setting that may have an important role in defining the character of settlements, including the following (shown on **Figure 6.3**):

- LCA2e 'Forest of Bere West' - reference is made to a traditional pattern of nucleated spring line settlements and common heath edge settlements.
- LCA 2f 'Forest of Bere East' - reference is made to traditionally dispersed settlements on the Forest edge, and commons and Forestry Commission sites forming very local countryside to large centres of population.
- LCA 3b 'Test Valley' - settlement is noted as being dominated by a pattern of linear villages and hamlets, with their form dictated by steep topography and communication routes.⁸⁴
- LCA3c 'Itchen Valley' - notes the valley setting and high tranquillity close to settlement; settlements being within outstanding river landscapes; and the importance of the historic landscape settings to conservation areas.
- LCA3d 'Hamble Valley' - notes the attractive waterside settlements and the importance of the historic landscape setting to conservation areas.
- LCA 3e 'Meon Valley' - describes the undeveloped slopes and valley crests as combining natural beauty in harmony with the cultural heritage of the settlements, and the importance of the historic landscape setting to conservation areas. The coastal plain setting of Titchfield is also specifically mentioned.
- LCA 8i 'Portsdown Hill and Open Downs' – notes the ridge landform as being fundamental to controlling the spread of development from the coastal plain, and the hill forming a green lung with easy access from settlements to the south.

⁸⁴However, it is acknowledged that this description does not relate well to the area of Southern Test Valley (STV) within South Hampshire.

- LCA 9d 'Netley, Bursledon and Hamble Coastline' - notes waterside historic cores and attractive waterside views over Southampton Water and parts of the Hamble valley.
- LCA 9f 'Gosport and Fareham Coastal Plain' – notes the varied coastal and harbour views over a busy stretch of the Solent and over Portsmouth Harbour.
- LCA 9g 'Havant and Emsworth Coastal Plain' – notes a rich historic built environment associated mainly with the harbour side; and harbour side access as having a high degree of naturalness and tranquillity.
- LCA 9h 'Hayling Island Coastal Plain' - notes outward coastal views from muddy harbour to open sea, and long distance views to the Isle of Wight, Portsmouth and coastal plain and chalk downs.

6.26 District/Borough-level Townscape Character

Assessments also indicate where adjacent landscape setting plays a role in defining character of urban areas, including the following:

- The Townscape Assessment of the Borough of Gosport (2013) identifies Portsmouth Harbour and associated tidal creeks, the Solent coastline and the Alver Valley as being important for the setting of the urban areas of the borough.
- The Havant Borough Townscape, Landscape and Seascape Character Assessment (February 2007) also identifies that Langstone Harbour and/or Chichester Harbour provide an open, rural setting to the settlements of Langstone, Emsworth, Stoke, Tye, North Hayling, South Hayling and West Town; that Portsdown Hill provides an open downland setting to Purbeck, Havant and Bedhampton; and that Staunton Country Park (with the South Downs beyond) provides an open, undeveloped landscape setting to the north of Havant.
- The Portsmouth City Council Urban Characterisation Study (March 2011) identifies that the relationship with the coastline contributes positively/significantly to the character of areas/TCAs to the south of Portsmouth; that Langstone Harbour provides an open setting and views to the east; that Portsmouth Harbour provides an open setting and views to the west; and that Portsdown Hill provides a setting to the north, including by providing spectacular panoramic views across the city.

6.27 Several Conservation Area Appraisals/Statements also indicate where adjacent landscape setting plays a role in defining the special qualities and/or character of conservation areas, including the following (conservation area name indicated in parenthesis where different from the settlement name or where multiple conservation areas reviewed):

Eastleigh

- Bishopstoke – physical and visual relationship with the River Itchen and its floodplain and the Itchen Navigation.
- Botley – physical and visual relationship with the River Hamble, Pudbrook Lake and adjacent agricultural land.
- Bursledon (Old Bursledon) - physical and visual relationship with the River Hamble and adjacent salt marshes.
- Hamble-le-Rice - physical and visual relationship with the River Hamble to the east and adjacent open spaces, including Hamble Green and Hamble Common, to the south and south-west.
- Netley (Netley Abbey) – physical and visual relationship with Southampton Water to the south-west; coastal setting, wooded edges and the ruins of Netley Abbey; and Westwood to the north-west.

East Hampshire

- Rowlands Castle – rural edge created by the grounds of Deerleap and the remains of the 12th century motte and bailey earth works (Scheduled Monument) to the south.
- Catherington – hilltop location and far reaching views across surrounding countryside; open countryside to the west providing a rural backdrop.
- Horndean - located within a dry valley, with chalk downland to the north and remnants of the Forest of Bere to the south; some woodland remains to the east providing a softened edge between Horndean and Blendworth; views into the area from the higher ground to the east and west.
- Blendworth – linear development follows Blendworth Lane upon rising land, with gaps between buildings and long views stretching to the countryside beyond.

Fareham

- Sarisbury (Sarisbury Green) – physical and visual relationship with the Hamble Valley to the west, including the parkland of Brooklands Estate, and open countryside to the north.
- Warsash – physical and visual relationship with the River Hamble to the west and Southampton Water to the south.
- Hook – relationship with 'The Fleet' (former tidal inlet) and surrounding open countryside which provides its setting and contributes strongly to its character.
- Titchfield (and Titchfield Abbey) – physical and visual relationship with the River Meon; and the surrounding open land, topography and tree cover (including land

associated with Titchfield Abbey to the north) which provide a rural backdrop and separation from other urban areas.

- Swanwick (Swanwick Shore) – physical and visual relationship with the River Hamble to the west and wooded valley-side of the Brooklands Estate to the south.
- Fareham (Fareham High Street, Town Quay, Catisfield and Wallington) – physical and visual connection with Fareham Lake/Creek to the south-east, the Wallington River valley to the east, and the Meon Valley to the west; the open parkland character of the Cams Hall Estate to the east; and the visual connection with Portsdown Hill.
- Portchester (Castle Street, Portchester) – physical and visual relationship with Portsmouth Harbour, the low-lying coast and the long high ridge of Portsdown Hill.

Gosport

- Lee-on-the-Solent – seafront location and views across the Solent.
- Gosport (Hardway, Haslar Peninsula, Rowner) – physical and visual relationship with Portsmouth Harbour to the east and The Solent to the south; and open rural land of the Alver Valley and Wild Grounds Nature Reserve to the west.

Havant

- Emsworth – physical and visual relationship with Chichester Harbour and the River Ems; woodland to the north; and open farmland to the west.
- Langstone (Langstone, Mill Lane, Wade Court and Warblington) – physical and visual relationship with Langstone and Chichester Harbours to the south; open fields to the north and west; open countryside, including Wade Park wooded estate landscape, to the east; a dense network of public footpaths, including the Wayfarers Walk/Solent Way and Shipwrights Way/Hayling Billy Leisure Trail; and areas of tranquillity.
- Bedhampton – relationship with open land immediately to the south and east of the settlement, including Bidbury Mead; the floodplain of Hermitage Stream; and open land to the south.
- North Hayling (St Peter's) – relationship with the surrounding farmland and tidal mudflats which contribute to a rural character.

New Forest

- Hythe – physical and visual relationship with Southampton Water.

- Fawley/Ashlett (Ashlett Creek) – relationship with the mill pond and The Green; and the physical and visual relationship with Southampton Water.
- Eling - rural setting on a hill overlooking Southampton Water and the tidal landscape of Bartley Water; physical and visual relationship with Southampton Water and Eling Creek.

Portsmouth

- Portsmouth (Old Portsmouth, Seafront) the physical and visual relationship with Portsmouth Harbour to the west; the open aspect and views out to sea to the south; the visual relationship between Old Portsmouth and Southsea Common.

Southampton

- Southampton (Itchen Valley, Oxford Street, Canute Road, Woolston) – functional, physical and visual relationship with Southampton Water and Docks; and physical and visual relationship with the River Itchen and Itchen Valley.

Test Valley

- Ampfield – woodland forming natural boundaries at Ampfield Plantation and Ampfield Wood; and open vistas south from the A31 (A3090) and Pound Lane.
- Romsey – physical and visual relationship with the River Test and a number of its braided channels to the west, and Broadlands Park to the south.
- Chilworth (Chilworth Old village) – open countryside and woodland surrounding the village, particularly to the west.

Winchester

- Bishop's Waltham – setting within Hamble Valley; visual relationship with higher ground to the south; and the historic and visual relationship with the landscape associated with Bishop's Waltham Palace to the south.
- Shedfield/Shirrell Heath (Shedfield) – surrounding areas of remnant heathland, comprising a mosaic of pasture, woodland and heath, including Shedfield Common to the south.
- Wickham – setting on the western bank of the River, and surrounding farmland, woodland, heaths, commons and large country estates.
- Southwick – lying within the lowlands north of Portsdown Hill; attractive approaches to the village and its setting; the historic relationship with the site of the Old Priory which immediately adjoins the east boundary of the conservation area.

Role of settlement gaps in setting

6.28 Seven of the 10 local authority areas within the PFSH area have settlement gap policies (refer to Chapter 5). The majority of these are primarily concerned with the spatial function of gaps in preserving openness and maintaining the physical and visual separation and separate identity of individual settlements, rather than innate landscape qualities or value (which are protected through the use of other policy mechanisms).

6.29 The exceptions to this are Policy CP18 of the adopted Winchester Local Plan Part 1: Joint Core Strategy (2013) and Policy DS2 of the emerging Fareham Local Plan 2037 (June 2021), which are also concerned with protecting the distinctive nature or character of settlements. The gaps identified in Fareham and Winchester relate to the following settlements, and may therefore play some role in defining their character:

- The 'Meon Gap' (Fareham) – Stubbington, Titchfield, Lock's Heath/Titchfield Common and Fareham (this lies within LCA 3e 'Meon Valley' and is consistent with the 'Meon Valley' ASLQ); and
- The 'Fareham/Stubbington Gap' (Fareham) – Fareham, Stubbington, Lee-on-the-Solent and Gosport.
- The 'Bishop's Waltham Gap' (Winchester) – Bishop's Waltham, Swanmore, Waltham Chase, and Shedfield/Shirrell Heath (this gap lies within LCA2e 'Forest of Bere West');
- The 'Whiteley Gap' (Winchester) – Whiteley and Fareham (this gap lies within LCA 3e 'Meon Valley');
- The 'Denmead Gap' (Winchester) – Denmead and Waterlooville (this gap lies within LCA 2f 'Forest of Bere East').

Future opportunities for landscape designation and conservation

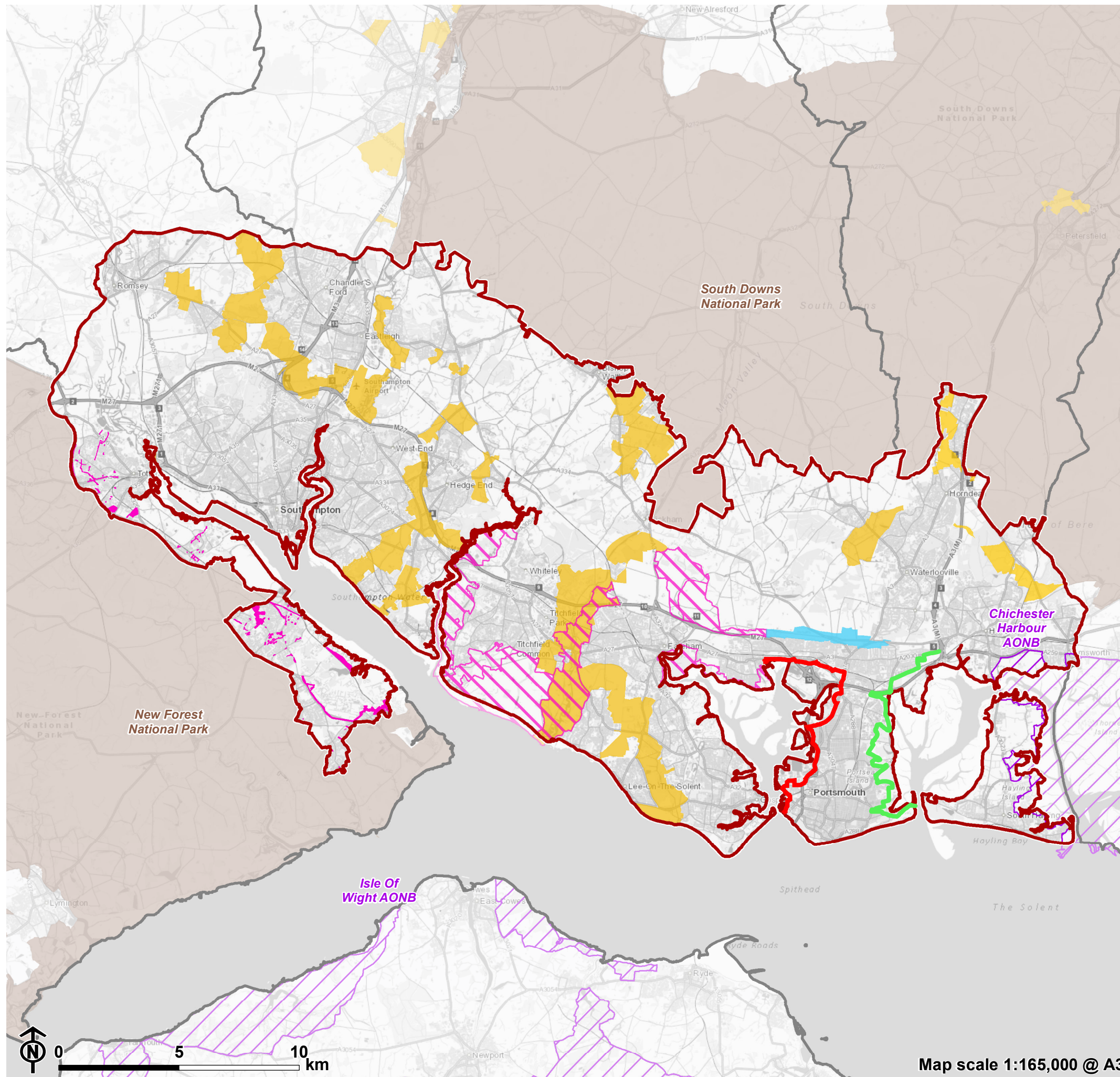
6.30 There is a general pattern of potentially higher valued landscapes concentrated in central and eastern parts of the PFSH area, as shown on **Figure 6.3**. This extends between Southampton and Havant, and forms the surrounding landscape context for the main urban areas. It includes the River Valley landscapes (Itchen, Hamble and Meon), the Solent coastline and harbour landscapes (Portsmouth and Langstone Harbours), Portsdown Hill and remnant parts of the Forest of Bere. There are also some outlying areas of potential landscape value to the west – the Test Valley and the New Forest Waterside/ Solent Coastline.

6.31 The river valley landscapes are important features of the wider landscape framework of the PFSH area (as described in paragraph 4.11 and 4.12). They also provide an important

setting for a number of settlements and form gaps between the various parts of the urban area, helping to maintain separation and settlement identity. Portsdown Hill is an important area of open land in proximity to the urban area of Portsmouth, Havant and Fareham which has constrained further growth of the urban area northwards. This ridge of higher ground also helps to reduce the influence of the urban area on remnant parts of the Forest of Bere to the north, helping to maintain its over-riding rural character. The Forest of Bere is a relatively well-wooded landscape that forms a buffer between the main urban area of the PFSH area and the SDNP to the north.

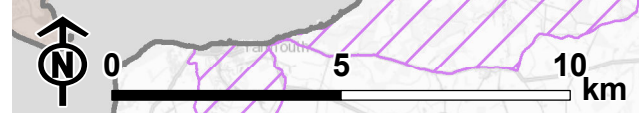
6.32 The policy options for proactively conserving and managing these areas are considered in **Chapter 7**.

Figure 6.1: Landscape Policy



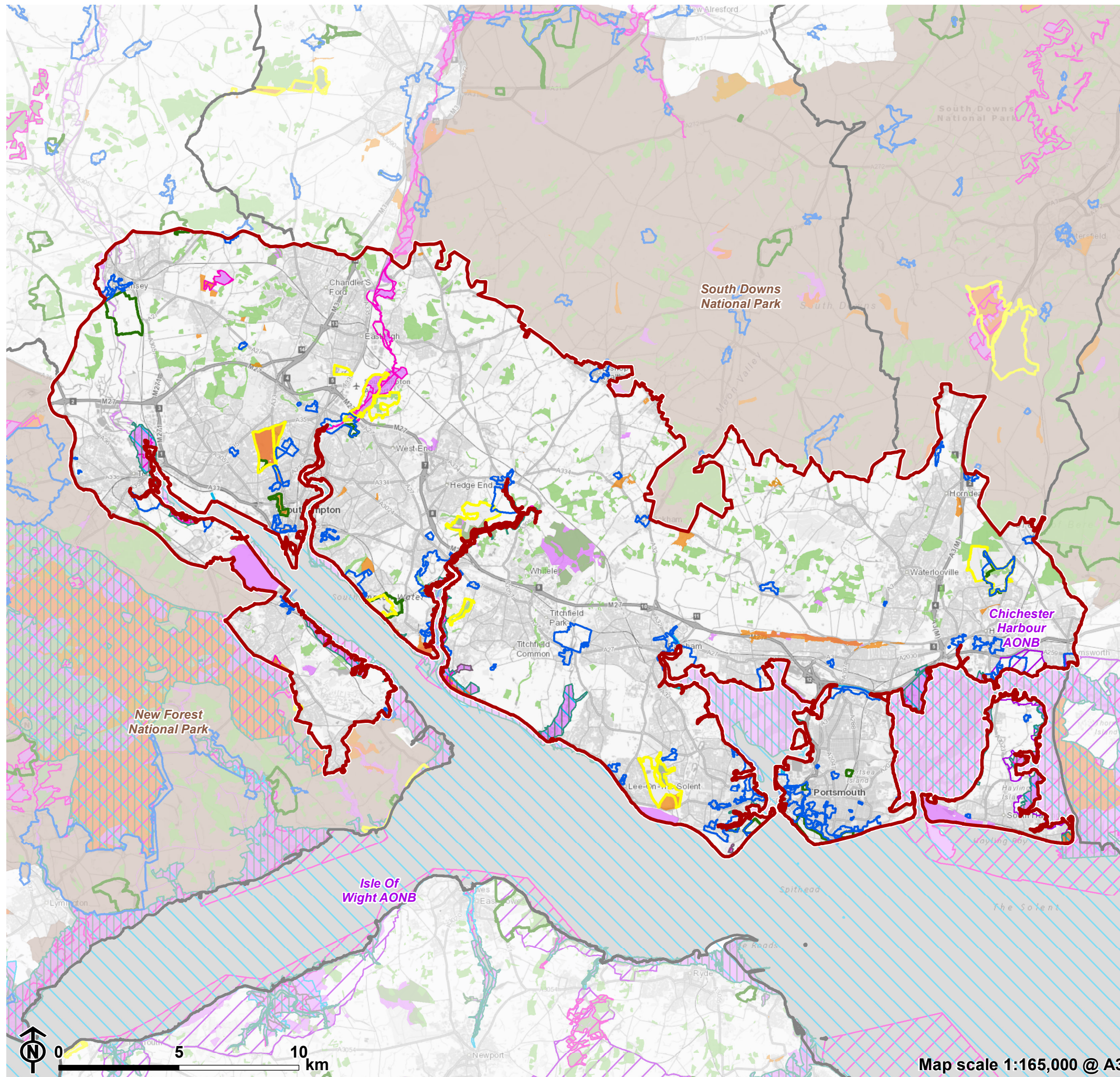
- Study area
- Neighbouring authority
- National designations**
- Area of Outstanding Natural Beauty
- National Park
- Local Policy**
- Settlement gap (all LPA's)
- Area of Special Landscape Quality (Fareham)*
- Landscape feature (New Forest)
- Langstone Harbour Coastal Zone (Portsmouth)
- Portsmouth Harbour Coastal Zone (Portsmouth)
- Portsdown Hill (Portsmouth)

*Referenced in emerging Local Plan



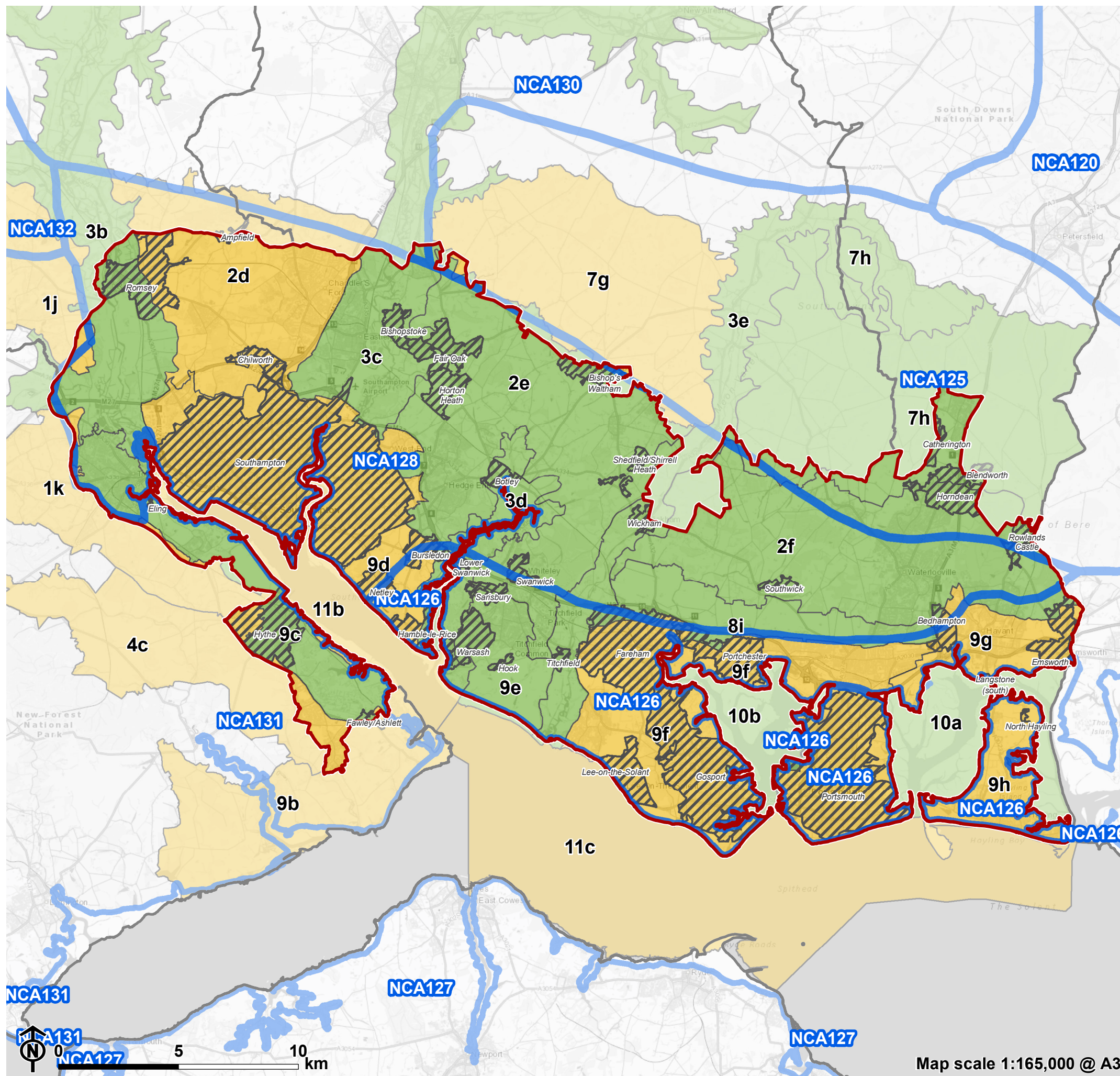
Map scale 1:165,000 @ A3

Figure 6.2: Landscape and Landscape-related Designations

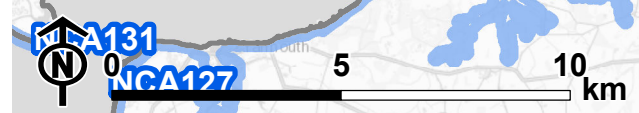


- Study area
- Neighbouring authority
- Area of Outstanding Natural Beauty
- Conservation area
- Ramsar site
- Registered Parks and Gardens
- Special Area of Conservation
- Special Protection Area
- Site of Special Scientific Interest
- Ancient woodland
- Country park
- Open Country & Registered Common Land
- National Park

Figure 6.3: Landscape Value



- Study area
- Neighbouring authority
- Settlement influenced by landscape setting
- National Character Area**
 - 125: South Downs
 - 126: South Coast Plain
 - 128: South Hampshire Lowlands
 - 131: New Forest
- Landscape Character Area within study area**
 - Other LCA
 - LCA with potential higher landscape value:
 - 2e: Forest of Bere West
 - 2f: Forest of Bere East
 - 3b: Test Valley
 - 3c: Itchen Valley
 - 3d: Hamble Valley
 - 3e: Meon Valley
 - 7h: South East Hampshire Downs
 - 8i: Portsdown Hill Open Downs
 - 9c: New Forest Waterside
 - 9e: Chilling Brownwich & Locks Heath Coastal Plain
 - 10a: Langstone and Chichester Harbours
 - 10b: Portsmouth Harbour



Map scale 1:165,000 @ A3

Chapter 7

Policy Options Review

7.1 As outlined in **Chapter 2**, the PfSH authorities have a list of clearly defined ambitions that they are striving to achieve within South Hampshire in relation to the protection of open countryside. This chapter explores a range of different planning policy options for achieving these policy ambitions. The policy options considered in this study are summarised in **Figure 7.1** below.

Figure 7.1: Policy Options



7.2 The protection of open countryside is a national planning principle delivered through all Local Plans. All planning authorities protect the open countryside either through the definition of a blanket local countryside protection policy and/or a spatial strategy that prioritises growth within or in the immediate vicinity of existing urban areas. Consequently, these standard countryside protection principles have not been evaluated here but rather represent the starting point upon which to build the more ambitious and extensive protections evaluated in this chapter.

7.3 It is assumed that some designations (Green Belts, GI policies and regional parks) offer more scope to cover larger geographical areas than others (area of separation policies and country parks). The designation of more discrete areas of open countryside using any policy mechanism would likely yield fewer positive outcomes.

Green Belt

7.4 Green Belt planning policy is 70 years old and its five purposes have remained unchanged for nearly 35 years. England's Green Belts have generally been very successful in preventing development and keeping designated land permanently open. Its success can be attributed to its simplicity, although the policy has received criticism in recent years for being too blunt an instrument for managing the latest planning challenges, notably the housing crisis, climate change and the rapid decline of biodiversity.

7.5 The National Planning Policy Framework (NPPF) states that 'the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence'. Current planning guidance makes it clear that the Green Belt is a strategic planning policy constraint designed primarily to prevent the spread of built development and the coalescence of urban areas.

Creating and justifying a new Green Belt policy

7.6 NPPF paragraph 139 emphasises that 'the general extent of Green Belts across the country is already established' and 'new Green Belts should only be established in exceptional circumstances, for example when planning for larger scale development such as new settlements or major urban extensions'. In the NPPF also states that when proposing new Green Belt, local planning authorities must through strategic policy:

- demonstrate why alternative policies would not be adequate;
- set out the major change in circumstances to make the designation necessary;

- communicate the consequences for sustainable development; and,
- highlight the consistency of the new designation with neighbouring plan areas and the other objectives of the NPPF.

7.7 NPPF paragraphs 139 and 140 state that 'proposals for new Green Belts should be set out in strategic policies' but their detailed boundaries may be defined 'through non-strategic policies, including neighbourhood plans'.

7.8 The necessary evidence to justify a new Green Belt must therefore be gathered early in the local plan-making process alongside the definition of the relevant principles of strategic planning policy, with detailed boundary definition being done later in the local plan-making process during the definition of more detailed local plan policy, or after the adoption of local plans through the definition of new neighbourhood plans in conformity with the adopted local plan.

7.9 NPPF paragraph 17 states that 'strategic policies can be produced in different ways, depending on the issues and opportunities facing each area. They can be contained in:

- a. *joint or individual local plans, produced by authorities working together or independently (and which may also contain non-strategic policies); and/or*
- b. *a spatial development strategy produced by an elected Mayor or combined authority, where plan-making powers have been conferred.'*

7.10 The former route is currently open to the PFSH authorities.

7.11 There is no nationally prescribed order of considerations or detailed guidance on how to shape and justify the designation of a new Green Belt. The following section considers the NPPF requirements relevant to designating a new Green Belt and offers some thoughts on how each might be delivered by the PFSH authorities.

Meeting growth needs beyond the plan period

7.12 NPPF Paragraph 22 states 'strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.' This long term vision is likely to be an important component of a new Green Belt strategic policy.

7.13 NPPF paragraph 23 states that 'strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development.' It would therefore be necessary for a new Green Belt strategic policy to be compatible with meeting these needs over the plan period and beyond (two plan periods roughly equals 30 years), i.e. that the new Green Belt would not restrict long term future growth needs, but would in fact help shape a planned sustainable pattern of development. Knowing how much growth is likely to be required in South Hampshire over the next 30 years, and where it is likely to go in broad terms, is therefore an important early consideration.

Duty to Cooperate – demonstrating the consistency of a Green Belt policy with strategic policies in adjoining authorities

7.14 NPPF paragraph 139 states that proposals for new Green Belts must demonstrate that the Green Belt is consistent with the strategic policies of adjoining authorities.

7.15 NPPF paragraph 27 states that 'strategic policy-making authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these. The PfSH authorities have a working statement of common ground, but a new Green Belt has the potential to have cross-boundary implications beyond the PfSH authorities' boundaries, particularly to the east towards Chichester District and West Sussex County, both of which share a border with the eastern extent of the PfSH plan area. Consideration should therefore be given to having separate discussions and statements of common ground with the wider region.

Demonstrate the necessity for a Green Belt

7.16 NPPF paragraph 139 states that proposals for new Green Belts must demonstrate the necessity for a Green Belt, including any major changes in circumstances that necessitate the exceptional measure (if they exist).

7.17 NPPF paragraph 139 also states that '*the general extent of Green Belts across the country is already established*', despite the pressure for growth across the country. Therefore, the substantial growth South Hampshire has received over the last 60 years is not enough in isolation to necessitate a Green Belt, nor is it useful to compare the extent and scale of this growth with other parts of the country that have Green Belts.

7.18 The PfSH area sits between two National Parks, the New Forest National Park (2005) and the South Downs National Park (2009), as well as Chichester Harbour Area of Outstanding Natural Beauty (AONB designated in 1964). NPPF paragraph 176 states that the scale and extent of development within these designated areas should be limited, and development within their setting sensitively located and designed to avoid or minimise adverse impacts on the designated areas. Furthermore, NPPF paragraph 177 states permission should be refused for major development⁸⁵ in national parks and AONBs other than in exceptional circumstances and consideration must first be given to developing outside these designated areas, or meeting related needs some other way.

7.19 National policy recognises National Parks and AONBs as areas where development may be restricted (NPPF paragraph 11, footnote 7) and there is a modest unmet housing need arising from the National Parks to be addressed. This coupled with the other internationally and nationally significant sensitivities in the sub-region – littoral and fluvial flood risk linked to climate change, the New Forest Special Area of Conservation (SAC), the Solent Special Protection Area (SPA) and associated SAC and Ramsar sites – sensitivities which extend well beyond their designated boundaries. In combination, they represent a considerable challenge in the sub-region to accommodate the scale of growth required over the long term with a new Green Belt.

7.20 Therefore, the necessity for a new Green Belt cannot be demonstrated until it is demonstrated that South Hampshire can meet its own growth needs, contribute to the relatively small shortfall in needs of the national parks where necessary and manage the sensitivities of its designated environmental constraints first. Once this has been robustly evidenced, the necessity to protect undesignated open countryside against additional growth through the designation of a new Green Belt can be seriously considered alongside the other tests set out in NPPF paragraph 139.

7.21 The additional tests set out in NPPF paragraph 139 are discussed in further detail below.

Demonstrate why normal planning and development management policies would not be adequate

7.22 NPPF paragraph 139 states that proposals for new Green Belts must demonstrate why normal planning and development management policies would not be adequate.

7.23 All of the constituent PfSH planning authorities have planning policies related to the protection of the countryside/open land. These are spatial policies concerned

⁸⁵ Whether a proposal is 'major development' is a matter for the decision maker, taking into account its nature, scale and setting, and

whether it could have a significant adverse impact on the purposes for which the area has been designated or defined.

predominantly with the control of development outside of the existing settlement boundaries/urban areas and consequently directly fulfil all five national Green Belt policies. In addition, the PfSH Spatial Position Statement (2016) highlights the importance of strategic countryside gaps in preventing the coalescence of and protecting the identity of distinct settlements. The constituent PfSH authorities have adopted a number of specific local planning policies that aim to achieve this:

- Protection of countryside gaps policy (Adopted Eastleigh Borough Local Plan).
- Gaps between settlements policy (Adopted East Hampshire Joint Core Strategy).
- Development in strategic gaps policy (Adopted Fareham Core Strategy & Emerging Fareham Local Plan).
- Protecting and enhancing open space (Adopted Southampton Core Strategy (partial review March 2015)).
- Local gap policy (Adopted Test Valley Revised Local Plan).
- Settlement gaps policy (Adopted Winchester Local Plan Part 1: Joint Core Strategy).

7.24 These local planning policies directly fulfil national Green Belt purpose 2 (to prevent neighbouring towns merging into one another) and partially contribute to the remaining four national Green Belt purposes. Other local planning policies protecting other environmental sensitivities such as landscape character, ecology and the historic environment help to maintain the openness of the countryside and thus indirectly contribute to the national Green Belt purposes too.

7.25 Although local planning authorities are able to remove or significantly change such local policies through the plan-making process, their universal adoption by the constituent PfSH authorities and their ongoing commitment set out in the PfSH Spatial Position Statement to maintain them suggests this is highly unlikely.

7.26 CPRE Hampshire commissioned West Waddy to assess the effectiveness of South Hampshire's settlement gap policies in achieving their purposes⁸⁶. The report documents the results of 40 appeals across the Eastleigh, Fareham, Havant Test Valley and Winchester planning authorities. Only 12 of the appeals were allowed, with the majority being for minor developments. Five of the allowed appeals represented major developments delivering roughly 1,400 homes in protected gaps. These appeals were generally allowed in the

absence of the authorities' ability to demonstrate a five-year housing supply. Successful appeals have continued to be made since this study in 2019, using a lack of a five-year housing supply as justification. The same justification is also used to permit development in Green Belts through the demonstration of 'very special circumstances'.

7.27 References to allowed appeals contrary to local planning policy are insufficient in isolation to demonstrate the inadequacy of local planning policy relative to national Green Belt policy, given the implementation of national Green Belt policy at the local level is also the subject of regular appeal. Consideration must also be given to whether, on balance, the local planning policies have generally been successful or not, i.e. whether the vast majority of allocated and permitted windfall development has been in conformity with the PfSH authorities' adopted spatial strategies and associated local planning policies. The scale of growth delivered in South Hampshire over the time period the recorded appeals took place significantly outweighs that delivered in protected gaps following successful appeals. Further evidence would therefore need to be gathered to demonstrate the inadequacy of existing relevant local planning policy. It is however fair to say that Green Belt policy represents a more permanent designation, providing longer term protection, compared to local policies which can be changed in every new Local Plan.

7.28 The PfSH authorities would also need to demonstrate that consideration has been given to other alternatives to a national Green Belt policy and explain why each alternative has been rejected in pursuit of a national Green Belt. The main alternatives to a new Green Belt policy are explored in the sections below.

Demonstrate how the Green Belt would meet the objectives of the NPPF

7.29 NPPF paragraph 139 states that proposals for new Green Belts must set out what the consequences of the proposal would be for sustainable development and demonstrate how the Green Belt would meet the other objectives of the NPPF. NPPF paragraph 8 sets out the overarching objectives of the framework for achieving sustainable development, which include:

- Sufficient land for growth/improved productivity, homes for present and future and infrastructure.
- Accessible services and open spaces that meet current and future needs.

⁸⁶ West Waddy, An Assessment of the Effectiveness of Settlement Gap Policies in South Hampshire in preventing Urban Sprawl & the Coalescence of Settlements, January 2019

- Protect and enhance the natural, built and historic environment.
- Making effective use of land and natural resources.
- Improving biodiversity.
- Minimising waste and pollution.
- Mitigating and adapting to climate change.

7.30 It would be necessary to demonstrate that the new Green Belt would not undermine the ability of the PfSH authorities to deliver any of these objectives. To do this there would need to be a clear understanding of where future growth would be located in the long term up to at least 2050, how the new Green Belt would help shape this sustainable pattern of development and deliver the conservation and enhancement of the open countryside's assets.

7.31 The PfSH assessment of Strategic Development Opportunity Areas (SDOAs) and associated Sustainability Appraisal work, as well as the local plan evidence bases of PfSH's constituent local planning authorities will be key to demonstrating this.

Defining detailed Green Belt boundaries

7.32 NPPF paragraph 140 states that once 'a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans'.

7.33 PfSH need not define detailed Green Belt boundaries in the Joint Strategy. As long as the extent of the new Green Belt is sufficiently well established to clearly understand the implications of its designation and meet the tests set out in NPPF paragraph 139, the drawing of detailed boundaries can be left until the boundaries of relevant non-strategic site allocations and associated development management designations are finalised in the later stages of the local plan-making process.

7.34 When defining Green Belt boundaries NPPF paragraph 143 states local planning authorities should:

- demonstrate consistency with local plan strategy, most notably achieving sustainable development;
- not include land which it is unnecessary to keep permanently open;
- safeguard enough non-Green Belt land to meet development needs beyond the plan period;

- demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and
- define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

Relevant case law

7.35 No new Green Belts have been designated in England for decades, so the only relevant case law it is possible to draw on relates to cases in which local authorities have tried to extend existing Green Belts.

7.36 These cases supplement national policy by drawing attention to some additional considerations in make a robust case for designating new Green Belt land.

Carpets of Worth Ltd v Wyre Forest DC (1991)⁸⁷

7.37 The Court of Appeal considered the correct approach to paragraph 3(a) of Circular 14/84: 'once the general extent of a Green Belt has been approved as part of the structure plan for an area it should be altered only in exceptional circumstances. ...Similarly detailed green belt boundaries defined in adopted local plans...should be altered only exceptionally'. Purchas LJ observed at 345-346 that 'the zoning of any particular area as a Green Belt sterilises that area except for [a] limited category of purposes...[and was therefore a]...kind of planning blight...', continuing: 'as it directly prejudices landowners in the otherwise proper development of their land an extension to the Green Belt should not be brought into effect unless it can be justified directly by those purposes for which the Green Belt is designed. There must therefore be an inhibition in extending a Green Belt so as to avoid sterilising unnecessarily neighbouring land...just as much as reductions in the boundaries of the Green Belt, which would prejudice the purposes of that Green Belt, must also only be made in exceptional circumstances.'

7.38 This case law is helpful in highlighting that a case for designating new Green Belt land is helped by establishing the likely contribution new Green Belt land would make to the five purposes of national Green Belt policy. **Chapter 3** represents a first step towards building this evidence, although a more detailed assessment of likely contribution to the five Green Belt purposes would be needed to inform judgements on the most appropriate extent of a new Green Belt, including at the Local Plan stage, consideration of appropriate readily recognisable and permanent Green Belt boundaries.

⁸⁷ Carpets of Worth Limited v Wyre Forest District Council (1991) 62 P & CR 334

COPAS v RB Windsor and Maidenhead [2001]⁸⁸

7.39 The Court of Appeal considered the updated test under PPG 2, paragraph 2.7: ‘where existing local plans are being revised and updated, existing Green Belt boundaries should not be changed unless alterations to the structure plan have been approved or other exceptional circumstances exist, which necessitate such a revision’. Simon Brown LJ agreed that the test under paragraph 2.7 was ‘very stringent’ and further observed ‘...where the revision proposed is to increase the Green Belt [this] cannot be adjudged to arise unless some fundamental assumption which caused the land initially to be excluded from the Green Belt is thereafter clearly and permanently falsified by a later event. Only then could the continuing exclusion of the land from the Green Belt properly be characterised as ‘an incongruous anomaly’.

7.40 This case law is in general conformity with NPPF paragraph 139 which states the need to demonstrate the necessity for a new Green Belt, including any major changes in circumstances that necessitate the exceptional measure (if they exist). The case law confirms that the evidential threshold for increasing the extent of or designating a new Green Belt is a high one.

Gallagher v Solihull MBC [2014]⁸⁹

7.41 This case law confirms that Carpets of Worth and COPAS remain applicable under the NPPF, stating: ‘...the fact that a particular site within a council’s area happens not to be suitable for housing development cannot be said without more to constitute an exceptional circumstance, justifying an alteration of the Green Belt by the allocation to it of the site in question. Whether development would be permitted on the sites concerned in this case, were they to remain outside the Green Belt, would depend upon the Council’s assessment of the merits of any planning application put forward. Moreover it is to my mind significant that in essence the merits or demerits of the possible use of these sites for housing have not apparently changed since 2005 when the same Inspector took a view diametrically opposed to his conclusion at paragraph 137: in March 2005 he had clearly concluded that the sites did not need to go into the Green Belt (and in the Solihull UDP of 2006 they were earmarked for review for housing). Yet at paragraph 137 of his current Report the Inspector makes no reference to his earlier opinion. For good measure, the SLP itself (paragraph 11.6.6, which I have read) plainly does not return the sites to the Green Belt for a Green Belt Reason.’

Would a Green Belt policy deliver the PfSH policy ambitions?

7.42 If it were possible to designate a new Green Belt in South Hampshire it would contribute to all the PfSH authorities’ ambitions summarised in **Chapter 2**, at least in part. Designating unprotected open countryside in South Hampshire as Green Belt would make it harder to develop in the open countryside in the long term, i.e. future development would be focussed within existing urban areas where possible, and the open settings and gaps between settlements would be more likely to be kept open and free from further development. However, the designation of a new Green Belt could only be achieved once sufficient land had been allocated to meet growth needs over two plan periods, which is approximately 30 years. It would protect the open countryside from further development in the longer term, but national Green Belt policy is not without caveats and flexible provisions for accommodating future growth, so further development of the open countryside and important countryside gaps would not be guaranteed if exceptional circumstances could be proven requiring the release of Green Belt land. Furthermore, Green Belt policy only protects open countryside from development and in doing so does not necessarily protect other special qualities of the countryside, such as landscape character or biodiversity, not linked to openness. There are arguably more effective means of protecting and managing these other important environmental issues than Green Belt policy.

7.43 **Table 7.1** lists the main strengths and weaknesses of a Green Belt policy.

Table 7.1: Strengths and weakness of the case for designating Green Belt

Strengths	Green Belt policy holds national significance and is generally supported by the general public and their political representatives, including in South Hampshire.
	Green Belt is a relatively simple designation to enforce once designated, and which has been largely effective at preventing development in Green Belt areas to date.
	The initial analysis in Chapter 3 suggests that there are areas of land in South Hampshire that would contribute to the Green Belt purposes (as defined in the NPPF) to a significant degree. For example Green Belt could help to prevent sprawl, maintain gaps between key settlements and prevent encroachment on the countryside. It could also help to preserve the setting and

⁸⁸ COPAS v RB Windsor and Maidenhead [2001] EWCA Civ 180; [2002] 1 P & CR 16

⁸⁹ Gallagher v Solihull [2014] EWHC 1283 and EWCA Civ 1610

	<p>special character in the Test Valley west and south west of Romsey and Portsdown Hill north of Portsmouth.</p>		<p>In the absence of a statutory Joint Plan covering South Hampshire, each LPA would need to designate new Green Belt land separately through their respective Local Plans, requiring considerable time and coordination to achieve. Landowners and developers would likely challenge the designation at each Local Plan examination.</p>
<p style="text-align: center;">Weaknesses</p>	<p>No new Green Belts have been designated in England in decades. Solving the housing crisis through the delivery of new homes has been a priority for successive national and local government over this period, which is why the bar for justifying new Green Belts set out in Chapter 13 of the NPPF is so high.</p>	<p>Notable locations for potential Green Belt designation</p>	
	<p>National Green Belt policy is focussed on preventing development, making it harder for South Hampshire to sustainably deliver the growth it needs – a challenge already made complex by the broad range of significant environmental constraints in the area.</p>	<p>7.44 Drawing on the high-level findings of Chapter 3, the following areas represent the most notable locations for Green Belt designation currently:</p>	
	<p>The extent to which development has already occurred could mean that a new Green Belt could be quite fragile in some places, resulting in the potential need to include land that makes a relatively weak contribution to the Green Belt purposes. Such areas may be vulnerable to boundary changes and/or development in the long term through future Local Plan Green Belt reviews.</p>	<ul style="list-style-type: none"> ■ The open countryside immediately north of the M27, around Eastleigh and Chandlers Ford and east and west of Waterlooville and Horndean, including the high ground of Portsdown hill. ■ The Test valley north west, west and south west of historic Romsey. ■ The narrow river valleys of the Alver, Hamble, Itchen, Meon and Test in between neighbouring towns. 	
	<p>Once established, Green Belts are not invulnerable to inappropriate development or alterations to their boundaries to accommodate growth. The NPPF sets out 'very special' and 'exceptional' circumstances for development within Green Belts and Green Belt release, respectively. Therefore, the designation of a new Green Belt in South Hampshire would not prevent all development in the open countryside.</p>	<p>Next steps</p>	
<p>National Green Belt policy is often misinterpreted to be a landscape, greenfield and/or green infrastructure protection designation rather than the simple spatial planning policy which it is. There are arguably more effective means of protecting and managing these other important environmental issues than Green Belt policy. For example, the NPPF does require local planning authorities to set out measures to enhance the beneficial uses of established Green Belt land, but the bar to demonstrate this is relatively low compared to other more environmentally-focussed planning issues, such as the need to demonstrate biodiversity net gain. Arguably there are more proactive and effective means of simultaneously protecting and enhancing the multiple functions of the open countryside.</p>	<p>7.45 To pursue the designation of a new Green Belt in South Hampshire the PFSH authorities' main priorities should be to:</p>		
		<ul style="list-style-type: none"> ■ Establish through robust evidence the broad scale and broad distribution of a sustainable pattern of development across South Hampshire for roughly the next 30 years, covering the next two local plan periods. ■ Undertake a detailed Green Belt contribution assessment to identify the likely contribution of a new Green Belt to the five national Green Belt purposes, to help to determine the potential boundaries of a new Green Belt. It would be important for this study to be informed by the likely scale and distribution of future growth in South Hampshire, so that the implications of this additional growth on the purposes of the new Green Belt could be thoroughly explored. ■ Set out how a Green Belt would deliver a sustainable pattern of development in South Hampshire in the long term. ■ Set out why existing relevant local planning policies and the alternatives considered in this report (and any additional alternatives identified) would fail to maintain and deliver the PFSH constituent authorities' planned sustainable patterns of development. ■ Depending on the outcome of bullets (1) and (2), contact the planning authorities neighbouring all PFSH 	

constituent local authority boundaries to inform them of the authorities' intention to pursue the designation of a new Green Belt and lay the groundwork for their cooperation and consultation, and produce or update relevant Statements of Common Ground.

- Update the PfSH Statement of Common Ground to establish the principles for a new Green Belt to be agreed through the new Joint Strategy, and how the subsequent detailed boundaries will be defined and justified by each constituent local authority through the definition of future local plans.

Designate areas of separation

7.46 Areas of separation designations focus on the protection of recognised strategic and fragile gaps between neighbouring settlements, both to protect the individual settlements' identities and/or the open countryside that lies between them.

7.47 Chapter 5 records the extent and priorities of the existing area of separation policies in South Hampshire and highlights additional gaps or extensions to gaps that could be considered for protection through new or amended areas of separation policies. This section covers how new areas of separation policies might be defined and implemented in South Hampshire and their strengths and weaknesses.

Creating and justifying new areas of separation

7.48 There are no specific national planning policy tests that need to be met in order to create and justify the designation of new local areas of separation or countryside gaps. Local planning authorities have the freedom to designate such areas as they please, as long as such designations do not conflict with the NPPF's goal to deliver sustainable development.

7.49 Consideration could therefore be given to consolidating all existing areas of separation, settlement gap and countryside gap policies in the PfSH authorities adopted local plans under a single strategic Joint Strategy policy to be reinforced and expanded upon as appropriate in each constituent authorities' emerging local plan. As part of this consolidation process, consideration could be given to designating some of the new or expanding some of the existing designations referenced in Chapter 5.

7.50 Clear consistent policy wording is very important for the successful implementation of area of separation policies. Reference to subjective wording such as settlement 'setting', 'identity' and 'distinctiveness' should be avoided unless reference can be made to robust evidence that clearly identifies how specific gaps contribute to these factors, i.e. the key features/factors in gaps that need to be conserved and enhanced. Depending on the gap, each area of separation could be either closely defined areas within which most

development is prohibited, or more loosely defined areas within which development has to meet defined criteria in order to be acceptable.

7.51 By focussing on key sensitivities and characteristics in need of protection in each area/gap, area of separation policies can protect what is important without inhibiting all development in gaps.

Would an areas of separation policy fulfil the five national purposes of Green Belts?

7.52 Designating new and expanding existing areas of separation policies would likely achieve or at least significantly contribute to achieving Green Belt purpose 2 (to prevent neighbouring towns merging into one another), but given the substantial areas of open countryside that fall outside settlement gaps it would not likely contribute significantly to Green Belt purposes 1 (to check the unrestricted sprawl of large built-up areas), 3 (to assist in safeguarding the countryside from encroachment), 4 (to preserve the setting and special character of historic towns) and 5 (to assist in urban regeneration, by encouraging the recycling of derelict and other urban land).

Would an areas of separation policy deliver the PfSH policy ambitions?

7.53 Defining the extents of a consistent South Hampshire-wide areas of separation policy would contribute to some of the PfSH authorities' ambitions summarised in Chapter 2, at least in part. However, the specific focus of the policy on preventing the coalescence of neighbouring settlements and maintaining their individual identities does limit their ability to protect and enhance the majority of open countryside in South Hampshire. Consequently, the designation of new or the expansion of existing areas of separation would only contribute in part to focussing future development to existing urban areas, and they would only protect landscape features, ecological and other green infrastructure within identified gaps rather than those in the wider countryside.

7.54 Table 7.2 lists the main strengths and weaknesses of an areas of separation policy.

Table 7.2: Strengths and weakness of an areas of separation policy

Strengths	Area of separation planning policies are easier to define and justify than Green Belts.
	Areas of separation are relatively simple designations, which are easy for the general public and developers to understand and planners to implement, as long as the protected characteristics of each defined gap are clearly communicated in policy.

Weaknesses	Areas of separation policies are primarily protectionist policies designed to limit growth in strategic and fragile gaps between neighbouring settlements, they are not focussed on the conservation and enhancement of the other values of open countryside, such as their landscape and ecological assets.
	Areas of separation policies are focussed on protecting specific areas of open countryside in between neighbouring settlements, so large areas of South Hampshire's open countryside that do not fall within strategic and/or fragile gaps between settlements would remain unprotected from encroachment by such policies.

Notable locations for potential additional areas of separation designation

7.55 Drawing on the high-level findings of **Chapter 5**, the following areas represent the most notable locations for additional areas of separation designation, due to their settlement setting and/or separating role:

- The North Whiteley – Botley gap.
- The North Whiteley – North Welborne gap.
- The eastern end of Portsdown Hill between Purbrook, Bedhampton and Drayton/Farlington/Cosham.
- North of Langstone.
- The Stoke – North Hayling – Tye – Fleet – South Hayling gaps.
- The Totton – Marchwood – Holbury – Hythe Blackfield – Fawley gaps.
- The Southampton/West End, Hedge End, Bursledon, Hamble, Netley gap.
- The Eastleigh – Bishopstoke gap.
- The Horton Heath, Boorley Green, Hedge End, Botley gap.
- The Lee-on-the-Solent – Stubbington gap.
- The North Baddesley - Chilworth Local gap.
- The Ampfield – Chandlers Ford gap.

7.56 In addition, there are several potential existing area of separation and countryside gap extensions outlined in **Chapter 5**.

Next steps

7.57 To pursue the definition of a new areas of separation policy or policies, including the designation of specific strategic and fragile gaps the PfSH authorities' main priorities should be:

- Consider the findings of **Chapter 5** to define the future extent of South Hampshire's areas of separation and gap policies.
- Map the extent of these areas and gaps clearly.
- Draft clear policy wording supported by a clear understanding of the key sensitivities and characteristics in need of protection in each area/gap.
- Draft a strategic areas of separation policy for inclusion in the Joint Strategy, setting how each constituent authority should define, structure and manage identified areas of separation consistently through local plans.

Green infrastructure opportunity areas

7.58 Green infrastructure, as defined by PfSH is a multi-functional network of green and blue spaces, urban and rural, that is capable of delivering a wide range of environmental and quality of life benefits for local communities. Now more than ever, people and public bodies are recognising the value of the Green Infrastructure network which surround us. The 25 Year Environment Plan (25YEP), published in 2018, outlines the Government's support for habitat creation and connection to support nature's recovery and to restore losses.

7.59 The Environment Act 2021 places the ambitions of the 25YEP on a statutory footing, by creating a new governance framework for the environment. The Act sets legally binding targets for the recovery of the natural world in four priority areas: air quality, biodiversity, water and waste. It includes an important new target to reverse the decline in species abundance by the end of 2030.

7.60 GI policies and designations vary significantly in scope and detail, from broad strategies and the identification of GI opportunity areas to standards for new development or specific detailed initiatives with clear budgets and deliverables.

7.61 **Chapter 4** records the extent and details of South Hampshire's existing GI policies and the GI Implementation Plan (2017) and associated South Hampshire Green Infrastructure Strategy 2017-2034, which together identify key strategic GI projects/initiatives across South Hampshire.

7.62 The constituent PfSH authorities' local plans make reference to these strategic initiatives as relevant to their respective geographical areas, although these areas of GI have no formal local protection.

Creating and justifying a new area-based green infrastructure policy

7.63 There are no specific national planning policy tests that need to be met in order to create and justify the designation of local GI. Local planning authorities have the freedom to designate GI as they please, as long as such designations do not conflict with the NPPF's goal to deliver sustainable development. In the absence of any formal guidance and secondary legislation for the designation or conservation of GI, the PfSH authorities could pursue:

- Identifying areas for GI protection and/or enhancement.
- Identifying standards for new development to comply with for example, , requiring adherence to 'Building with Nature Standards',⁹⁰ and/or setting a requirement for biodiversity net gain (BNG) – this could go above the future national requirement of 10%.
- Providing policy support for projects, for example for increasing canopy cover throughout urban areas and beyond, or named infrastructure projects required to support growth.

7.64 All three are important, but given the focus of this study is on the protection and conservation of the open countryside from encroachment, only the designation of new areas for GI protection and enhancement has been considered in more detail.

7.65 The PfSH authorities should give consideration to the identification and mapping of strategic GI opportunity areas in the Joint Strategy, supplemented by policy setting out expectations for development in these locations to make a positive contribution towards the environmental enhancement of these areas. This approach has the potential to lead to significant environmental improvements in these areas, so long as the policy is suitably supportive, and that funding is made available and delivery partners identified. It should be recognised however that some enhancements may take some time to deliver.

7.66 Funding could be made available through developer contributions towards open space and biodiversity net gain (where these cannot be provided on site), from environmental land management scheme funds, nature / health and wellbeing grants (for example from the Heritage Lottery), nutrient neutrality funding and / or nature-based organisations own budgets.

7.67 It is important to secure the improvements made in the long term, through mechanisms such as land purchase or conservation covenants (should these be legislated for). Maintenance funding is also key, and contributions should

provide for this, for example through bonds or other mechanisms. Uses which generate ongoing maintenance funding and which align with the policy ambitions in each area should also be promoted.

7.68 In order to help deliver these recommendations, specific resource should be identified within local government or local nature focussed organisations to review and comment on planning applications.

7.69 In addition, in order to help ensure political support, it is recommended that a senior elected member is given a specific remit for green infrastructure delivery, including the environmental improvement areas.

Future national nature recovery network

7.70 The Environment Act (2021) contains requirements designed to help achieve the 25 Year Environment Plan, including a commitment to create a national nature recovery network (NRN). The network is to be comprised of a combination of existing important wildlife habitats and the places where habitats need to be restored or created in order to expand and connect existing habitat fragments. The Government has set a number of targets for the NRN by 2042, including to:

- Restore 75% of protected sites on land (including freshwaters) to favourable condition so nature can thrive.
- Create or restore 500,000 hectares of additional wildlife-rich habitat outside of protected sites.
- Achieve a range of environmental, economic and social benefits, such as carbon capture, flood management, clean water, pollination and recreation.

7.71 The NRN is to be delivered through Local Nature Recovery Strategies (LNRS), but there is uncertainty as to what these will contain.

7.72 LNRS are to be prepared by 'responsible authorities'; however, the Environment Act doesn't specify who these authorities will be. The Wildlife Trust suggests that county councils and unitary planning authorities would be the best placed to be the responsible authorities given existing Local Nature Partnerships already operate at the county level.

7.73 Planning authorities are awaiting further statutory guidance and secondary legislation to confirm how the NRN should be defined and managed, to deliver consistency across the country. The Wildlife Trust has called for the NRN to be:

- Evidence based.
- Locally developed and nationally connected.

⁹⁰ <https://www.buildingwithnature.org.uk/>

- Statutory.
- Spatially planned.
- Our collective responsibility.⁹¹

7.74 Any strategic South Hampshire GI initiatives should be compatible with the future national nature recovery network ambitions.

Would a green infrastructure policy fulfil the five national purposes of Green Belts?

7.75 Designating large areas of open countryside as important green infrastructure would likely safeguard significant areas of South Hampshire’s open countryside from encroachment, contributing to Green Belt Purpose 3 (to assist in safeguarding the countryside from encroachment), although there is not guarantee that all open countryside would be protected, also potentially limiting contribution to Green Belt Purpose 5 (to assist in urban regeneration, by encouraging the recycling of derelict and other urban land). Given that the presence of green infrastructure is not influenced by the spatial relationship of the open countryside to large built-up areas, neighbouring towns and historic towns, the contribution of such a designation to Green Belts purposes 1 (to check the unrestricted sprawl of large built-up areas), 2 (to prevent neighbouring towns merging into one another) and 4 (to preserve the setting and special character of historic towns) is also likely to depend on the location of GI opportunity areas.

Would a green infrastructure policy deliver the PfSH policy ambitions?

7.76 Defining the extents of a consistent South Hampshire-wide GI policy would contribute to most of the PfSH authorities’ ambitions summarised in **Chapter 2**, at least in part. However, the more general, aspirational nature of such policies the harder to deliver benefits and protect the open countryside from development. Not all of South Hampshire’s open countryside is recognised as having green infrastructure value, so not all open countryside would be protected by such a designation, resulting in the potential for the future development of greenfield land outside of existing urban areas, including in fragile gaps between settlements and sensitive landscapes. It is however likely that a comprehensive GI policy would protect and set out measures to connect and enhance South Hampshire’s sensitive ecological assets and functionally linked land.

7.77 **Table 7.3** lists the main strengths and weaknesses of a GI policy.

Table 7.3: Strengths and weakness of local green infrastructure policy

Strengths	GI planning policies are easier to define and justify than Green Belts.
	GI has multiple functions, so policies that maintain, connect and enhance GI have greater scope to deliver multiple enhancements in the open countryside.
	GI covers the majority of the open countryside offering scope for a greater geographical coverage of protection and management.
Weaknesses	GI policies can be more strategic and general, giving rise to greater risks that their aspirations will not be delivered consistently and comprehensively across South Hampshire – significant long term funding streams would be required.
	It may be harder to justify what land should be designated for GI protection and enhancement and may be challenged by landowners/ developers.
	GI policies focus on the protection, improved connection and enhancement of the GI network. They would likely not prohibit development in the open countryside if such development could demonstrate it was compatible and could deliver new improvements and associated benefits.
	There is ongoing policy uncertainty around how the NRN will be delivered and what protection will be offered to areas designated for protection or enhancements.

Notable locations for potential green infrastructure designation

7.78 Drawing on the high-level findings of **Chapter 4**, the following areas represent the most notable locations for green infrastructure opportunity areas:

- The sub-regions country parks and woodland, particularly the Forest of Bere.
- Habitats functionally linked to estuarine and other coastal designated habitats.
- The sub-region’s waterways and narrow river and rail corridors.

⁹¹ Wildlife Trusts (2021), '[Nature Recovery Network Handbook](#)'

Next steps

7.79 To pursue the definition of a new GI policy or policies, including the designation of specific areas for GI improvement, the PfSH authorities' main priorities should be to:

- Supplement the authorities' existing GI evidence bases to update the extent and ambition of the South Hampshire GI network, its functions, sensitivities and opportunities to enhance and connect it with the wider area. This should include reference to information on functionally linked land and nature recovery networks.
- Map the extent of the updated GI network and the specific conservation and enhancement projects within it.
- Monitor national GI policy changes and consultations and engage with Natural England on their implementation.
- Draft a strategic GI policy for inclusion in the Joint Strategy, setting how each constituent authority should define, structure and manage identified areas of GI consistently through local plans.

Landscape designations

Landscape designations focus on the protection of recognised landscape qualities and sensitives supported by evidence. They go a step further than the common strategy to prohibit development in the open countryside by defining specific areas of sensitivity and spelling out measures to ensure their conservation and enhancement. This could include the designation of local landscape designations. **Chapter 6** records the extent and details of the existing landscape policies in South Hampshire with reference to the neighbouring national parks and AONB and highlights additional landscape qualities and sensitives that could be considered for protection through new or refined landscape policies. The following section covers how new landscape policies might be defined and implemented in South Hampshire and their strengths and weaknesses.

Creating and justifying a new landscape policy

7.80 There are no specific national planning policy tests that need to be met in order to create and justify the designation of local landscapes. Local planning authorities have the freedom to designate landscapes as they please, as long as such designations do not conflict with the NPPF's goal to deliver sustainable development.

7.81 Consideration could therefore be given to consolidating landscape areas in need of protection (see **Chapter 6**) under a single strategic Joint Strategy policy to be reinforced and

expanded upon as appropriate in each constituent authorities' emerging local plan.

7.82 Again, such policy should be evidence driven to avoid confusion and inconsistency in implementation. Reference to subjective wording should be avoided unless it can be tied to robust evidence that clearly identifies the key features/factors that need to be conserved and enhanced.

7.83 There are various policy options that could be employed to protect valued landscapes/areas of landscape, including:

- A policy to protect and enhance existing 'valued landscapes' – this would be a development of existing policies relating to the nearby national designations (National Parks and AONBs), with reference to development within their setting being sensitively located and designed to avoid or minimise adverse impacts on the designated areas. This could include parts of the former Forest of Bere (Landscape Character Areas 2e and 2f) located within the setting of the SDNP; parts of the Solent Coastline in the setting of the NFNP; and parts of Langstone Harbour in the setting of Chichester Harbour AONB.
- A separate policy for 'valued landscapes and/or features' within the PfSH area. This could be:
 - An area-based policy protecting areas valued at the PfSH area level e.g. Areas of Special Landscape Quality or similar, for which an evidence base assessing landscape value could be produced and used as a basis; or
 - A criteria-based policy for protection of valued features across the whole PfSH area, i.e. to protect the 'key qualities', valued features and key characteristics listed for each LCA. This option could be linked to a separate landscape character policy (see below).
 - A policy to recognise the intrinsic character and beauty of the countryside and protect and enhance character with reference to the Landscape Character Assessment and any further evidence base produced.
 - A policy for protecting and enhancing the setting of settlements, for which an evidence base assessing the role of landscape setting in defining the character of settlements could be produced and used as a basis.
 - An 'open land' policy for limiting development in the 'countryside', i.e. anything that is not within settlement boundaries/urban areas or that is allocated. This is more of a spatial policy rather than landscape policy, although it could be linked to the

policy recognising the intrinsic character and beauty of the countryside.

Designating new or extending existing National Parks or AONBs

7.84 In England and Wales, National Parks and Areas of Outstanding Natural Beauty (AONBs) are designated under the National Parks and Access to the Countryside Act 1949⁹². It is the job of Natural England to designate these areas, not local planning authorities. Before making an order designating a National Park or AONB, Natural England must consult with every local authority whose area includes any land in the area to be designated a Park.

7.85 The order to designate must describe the area to be designated a Park/AONB by reference to a map and such other descriptive matter as are relevant, covering their special qualities such as their natural beauty, wildlife, and cultural heritage, and the opportunities they afford for open-air recreation, having regard both to their character and to their position in relation to centres of population.

7.86 The Secretary of State for Levelling Up, Housing & Communities has the power to vary an order designating a National Park/AONB, but must first consult with the National Park authority for the Park(s) in question and local authority whose area falls within or partially within the National Park/AONB (existing or proposed).

7.87 The PfSH authorities would need to directly lobby Natural England and central Government to consider extensions to the existing national parks and AONBs in south Hampshire. The most recent example of the successful implementation of an extension to a national park took place in 2016 with the extensions of the Lake District National Park and Yorkshire Dales National Park. The process took over 10 years.

Would a landscape policy fulfil the five national purposes of Green Belts?

7.88 Protecting sensitive landscapes would likely safeguard the areas of South Hampshire’s open countryside that contribute to the setting and special character of its historic towns, namely Portsdown Hill and the Test Valley, fulfilling Green Belt Purpose 4 (to preserve the setting and special character of historic towns). It would also likely protect significant areas of South Hampshire’s open countryside from encroachment, contributing to Green Belt Purpose 3 (to assist in safeguarding the countryside from encroachment), although it is highly unlikely all open countryside would be protected, also limiting contribution to Green Belt Purpose 5 (to assist in

urban regeneration, by encouraging the recycling of derelict and other urban land). Given that not all of South Hampshire’s sensitive landscapes are influenced by the spatial relationship of the open countryside to large built-up areas and neighbouring towns, the contribution of such a designation to Green Belt purposes 1 (to check the unrestricted sprawl of large built-up areas) and 2 (to prevent neighbouring towns merging into one another) would be limited to the areas of higher landscape value etc.

Would a landscape policy deliver the PfSH policy ambitions?

7.89 Defining the extents of a consistent South Hampshire-wide local landscape policy would contribute to most of the PfSH authorities’ ambitions summarised in **Chapter 2**, at least in part. However, for such a policy to be effective and deliverable, it would need to be tied to clear landscape qualities in need of conservation and enhancement, which would likely limit its ability to protect and enhance the majority of open countryside in South Hampshire, resulting in the potential for the future development of greenfield land outside of existing urban areas, including areas of important green infrastructure and ecological habitats.

7.90 **Table 7.4** lists the main strengths and weaknesses of a landscape policy.

Table 7.4: Strengths and weakness of local landscape policy

Strengths	Landscape planning policies are easier to define and justify than Green Belts.
	Landscape polices could cover large areas of South Hampshire’s open countryside, including sensitive gaps between settlements.
Weaknesses	Landscape policies are primarily protectionist policies, they do not always conserve and enhance the other values of open countryside, such as their ecological assets or their openness if openness is not considered important to character.
	Landscape policies are focussed on protecting specific landscape qualities, so large areas of South Hampshire’s open countryside not recognised for their landscape value could remain unprotected.
	Local landscape policies would likely not prohibit development in the open countryside if such development could demonstrate

⁹² National Parks and Access to the Countryside Act 1949 Available at: <https://www.legislation.gov.uk/ukpga/Geo6/12-13-14/97>

minimal impacts on its identified landscape qualities.

Notable locations for potential landscape designation

7.91 Drawing on the high-level findings of **Chapter 6**, the following areas represent the most notable locations of higher valued landscapes for landscape designation:

- The river valley landscapes (Itchen, Hamble and Meon).
- The Solent coastline and harbour landscapes (Portsmouth and Langstone Harbours).
- Portsdown Hill.
- Remnant parts of the Forest of Bere.
- The Test Valley and the New Forest Waterside/ Solent Coastline.

Next steps

7.92 To pursue the definition of a new local landscape policy or policies, including the designation of specific areas of sensitivity/special character, the PfSH authorities' main priorities should be to:

- Supplement the authorities' existing landscape evidence bases to formally define the landscape qualities and sensitivities of South Hampshire's landscapes.
- Map the extent of these landscapes building on the work set out in **Chapter 6** and **Figure 6.3**.
- Draft clear strategic policy for inclusion in the Joint Strategy, including clear guidance on how each constituent PfSH authority should name, evidence and implement more detailed local plan policies.

Country parks

7.93 Country parks are areas for people to visit and enjoy recreation in a countryside environment. Country parks were developed as a concept during the 1960s. They were designated to redirect an increasingly mobile population away from sensitive national parks⁹³, forests and agricultural land and to give urban populations easy access to the benefits of the countryside close to where they live.

Creating and justifying new country parks

7.94 There is no legal framework for the provision of country parks in England. The Public Health Act of 1875 enabled the

purchase and maintenance of land to be used for public access, which was later transferred to the relevant Council's management with the Open Spaces Act of 1906. However, there remains no statutory requirement for local authorities to provide public parks, with the responsibility falling to the planning system to assess current provision and sets quantitative and qualitative standards for parks.

7.95 The National Planning Policy Framework (NPPF) supports the provision and enhancement of open space for recreation. NPPF paragraph 98 stresses that access to a network of high-quality open spaces is important for the health and well-being of communities, whilst delivering wider benefits for nature and helping to address climate change.

7.96 NPPF paragraph 175 states that local plans should take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries. The provision of parks is therefore a strategic matter, about which local planning authorities are expected to cooperate.

7.97 Most of the UK's country parks are owned and managed by local authorities and many were designated in the 1970s by the then Countryside Commission on disused collieries, old railway lines, stately homes, under the Countryside Act⁹⁴. The Countryside Act gives local authorities the power to create, extend, maintain and manage country parks on any site in the countryside appearing to them suitable or adaptable for the purpose, either on land under the ownership of the local authority or on other land where agreement has been secured from the land owner. Local authorities have the power to compulsorily purchase land for use as country parks.

7.98 More recently country parks have been created under a less formal arrangement and Natural England is working with partners to encourage accreditation of such parks⁹⁵. Accredited parks must be:

- at least 10 hectares in size;
- defined by a clear boundary – marked on a map, whether it's open or fenced in;
- accessible – less than 10 miles from a residential area;
- free to enter;
- inclusive and accessible – show how they've met equality and disability needs and provided for varied groups;

⁹³ The area of South Hampshire that the study focusses on sits between the National Parks of the New Forest to the south, the South Downs to the north and the Chichester Harbour AONB to the east.

⁹⁴ Countryside Act (1968):

<https://www.legislation.gov.uk/ukpga/1968/41>

⁹⁵ Natural England Guidance on country park accreditation:

<https://www.gov.uk/guidance/get-accreditation-for-your-country-park>

- predominantly natural or semi-natural landscape, for example woodland, grassland, wetland, heathland or parkland, with no more than 5% of the area built upon (excluding car parks);
- signposted and easy to navigate – showing visitors where they can go, what they can do and direct them along footpaths, bridleways and cycle routes;
- visibly staffed, for example litter collection and maintenance;
- available for public or educational events;
- near public toilets – either on-site or a 2 minute walk away; and
- informed by the local community – the public should have some influence over the management and development of your site.

7.99 Securing the land and meeting all these requirements would be a significant undertaking.

7.100 Any new locations that fulfil these criteria could be potentially new suitable locations for country parks, for example some of the narrower river valleys which separate settlements or the remnants of the Forest of Bere. These parks would contribute to the requirement for Suitable Alternative Natural Green Space (SANGs) in close proximity to the New Forest in order to redirect recreational disturbance.

Would the designation of more country parks fulfil the five national purposes of Green Belts?

7.101 Designating more country parks would likely safeguard some more areas of South Hampshire’s open countryside immediately adjacent to some existing urban areas, given the accessibility of these locations. This would likely partially contribute to Green Belt purposes 1 (to check the unrestricted sprawl of large built-up areas) and 3 (to assist in safeguarding the countryside from encroachment), and potentially 2 (to prevent neighbouring towns merging into one another), in discrete areas of South Hampshire. However, significant areas of South Hampshire’s open countryside would likely remain unprotected, limiting contribution to all five Green Belt purposes.

Would more country park designations deliver the PfSH policy ambitions?

7.102 Designating new country parks would contribute to most of the PfSH authorities’ ambitions summarised in **Chapter 2**, at least in part. However, it would protect and enhance only distinct areas of open countryside rather than prohibiting development in all of South Hampshire’s open countryside, resulting in the potential for the future development of greenfield land outside of existing urban

areas. Country parks need only be accessible and have a good range of facilities to facilitate recreation, so there is no guarantee they would be located in all unprotected settlement gaps, areas of landscape value, green infrastructure opportunity areas or areas in need of ecological protection/enhancement.

7.103 **Table 7.5** lists the main strengths and weaknesses of country park designations.

Table 7.5: Strengths and weakness of country park designations

Strengths	Parks defined and managed through local planning policy will be easier to define and justify.
	Parks are in active use and require proactive management, which is likely to deliver multiple benefits in the long term.
Weaknesses	Parks cover discrete areas of South Hampshire and would therefore not protect all greenfield land from development, including all sensitive settlement gaps, landscapes, ecological assets and functionally linked land.
	Securing the land and finding the funds to meet the Natural England accreditation requirements would be a significant financial undertaking.

Next steps

7.104 To pursue the designation of new country parks in South Hampshire the PfSH authorities’ main priorities should be to:

- Supplement the authorities’ existing evidence bases to formally define the extent of a suitable new country parks.
- Map the extent of these parks and seek Natural England accreditation.
- Identify funding opportunities and delivery mechanisms.
- Draft clear strategic policy for inclusion in the Joint Strategy, formally designating the new country parks from reference and management through relevant PfSH authority local plans.

Regional parks

7.105 Regional parks are larger than country parks often serving a population greater than a single authority area, and often extending across multiple local authority boundaries. Regional parks provide a more integrated, landscape-scale

policy intervention than country parks, generally serving more needs on a more ambitious scale – i.e. in relation to recreation, landscape, nature recovery and climate change adaptation.

7.106 There are a few examples of regional parks across England and there is growing policy engagement, most notably in London⁹⁶.

7.107 The London Plan contains a public open space categorisation which defines London's regional parks as 'large areas, corridors or networks of open space, the majority of which will be publicly accessible and provide a range of facilities and features offering recreational, ecological, landscape, cultural or green infrastructure benefits'. The London Plan park size guidelines define regional parks as 400ha or more and recommended that they be readily accessible by public transport and managed to meet best practice quality standards.

Creating and justifying new regional parks

7.108 There is no legal framework for the provision of regional parks in England. The Public Health Act of 1875 enabled the purchase and maintenance of land to be used for public access, which was later transferred to the relevant Council's management with the Open Spaces Act of 1906. However, there remains no statutory requirement for local authorities to provide public parks, with the responsibility falling to the planning system to assess current provision and sets quantitative and qualitative standards for parks.

7.109 The NPPF supports the provision and enhancement of open space for recreation. NPPF paragraph 98 stresses that access to a network of high-quality open spaces is important for the health and well-being of communities, whilst delivering wider benefits for nature and helping to address climate change.

7.110 NPPF paragraph 175 states that local plans should take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries. The provision of parks is therefore a strategic matter, about which local planning authorities are expected to cooperate.

Creating new regional parks

7.111 In the absence of any formal legislation or guidance for the designation of regional parks this section explores three broad types of regional park that have been created:

- Regional parks with a statutory basis.
- Regional parks which hold status within the planning system.
- Regional parks formed as part of a county or sub-regional partnership.

Regional parks with a statutory basis

7.112 Two regional parks hold a statutory basis, meaning that they have been created by means of a statute with specific purposes to protect and enhance the area for the wider public interest:

- **Lee Valley Regional Park** and the associated Lee Valley Regional Park Authority responsible for managing and developing the park were created by the Lee Valley Regional Park Act in 1966. The Lee Valley Regional Park Authority covers 10,000 acres over a 26 miles stretch of the River Lee and navigation, running through northeast of Greater London, Essex and Hertfordshire. Local planning authorities within whose boundaries the regional park lies are required to include the relevant area proposals of the Park in their local plans.
- **Colne Valley Regional Park** was founded in 1965 and is managed by a Community Interest Company (CIC) which represents the interests of everyone who lives, works and plays in the Colne Valley. The park covers 11,000 hectares of parks, green spaces and reservoirs alongside the River Colne, flowing through Berkshire, Hertfordshire, Buckinghamshire, Surrey and the London Borough of Hillingdon. The regional park is referenced in the South Buckinghamshire and Chiltern Local Plan.

Regional parks which hold status within the planning system.

7.113 The following regional parks are referenced in relevant local authorities' local plans:

- **Wandle Valley Regional Park** and the Wandle Valley Regional Park Trust were formed in 2012 but has yet to be formally created. It covers 900 hectares of over 40 green spaces and 12 nature reserves, linked by the riverside Wandle Trail, winding through the London Boroughs of Wandsworth, Merton, Sutton and Croydon. The National Trust are playing a key role in its creation. The proposed park boundary has been identified in the Mayor of London's All London Green Grid Area Framework and four Borough Local Plans.

⁹⁶ Mayor of London, London Plan, 2021:
<https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/london-plan-2021>

- **Clyst Valley Regional Park** is an emerging park covering 5,500 hectares in East Devon. The East Devon Local Plan allocates land in the Clyst Valley for the Park and outlines six objectives including the provision of green space, enhancing heritage assets and providing new wildlife corridors.
- **Nene Regional Park** covers 1,026 hectares along the valley of the River Nene immediately west of Peterborough. The Peterborough Local Plan references the Nene Park masterplan.

Regional parks formed as part of a county or sub-regional partnership

7.114 Other regional parks have or are in the process of being formally defined by a number of relevant planning authorities:

- **Sherwood Forest** originally opened as a country park in 1969 but was subsequently reopened by RSPB in 2018. The RSPB managed the forest’s roughly 425 hectares on behalf of Nottinghamshire County Council, with support from the Sherwood Forest Trust, Thoresby Estate and The Woodland Trust.
- **South Essex Estuary Park** is an emerging regional park scoped to extend from Tilbury Fort to Shoeburyness. The South Essex Local Authorities, including Basildon, Brentwood, Castle Point, Rochford, Southend-on-Sea, Thurrock and Essex County Council are working together to define its boundaries, objectives and facilities.

7.115 Regardless of the route pursued, securing the land and coordinating delivery would be a significant undertaking.

7.116 Again, these parks would contribute to the requirement for Suitable Alternative Natural Green Space (SANGs) in close proximity to the New Forest in order to redirect recreational disturbance.

Would the designation of a new regional park fulfil the five national purposes of Green Belts?

7.117 Protecting a large area of South Hampshire’s open countryside for use as a new regional park would likely safeguard significant areas of South Hampshire’s open countryside from encroachment, contributing to Green Belt Purpose 3 (to assist in safeguarding the countryside from encroachment), although it is highly unlikely all open countryside would be protected, limiting contribution to Green Belt Purpose 5 (to assist in urban regeneration, by encouraging the recycling of derelict and other urban land).

7.118 The potential flexibility available in defining this area coupled with the general need for it to be relatively accessible to existing urban areas offers scope to protect large areas of

the open countryside immediately adjacent to South Hampshire’s large built-up area, helping to inhibit further sprawl and maintaining a significant proportion of the sensitive gaps between neighbouring towns, potentially contributing significantly to Green Belt purposes 1 (to check the unrestricted sprawl of large built-up areas), 2 (to prevent neighbouring towns merging into one another) and 4 (to preserve the setting and special character of historic towns). However, the ability of a regional park to fulfil or significantly contribute to all Green Belt purposes would be dependent on the creation of a Park that covered most of the sub-region’s open countryside.

Would a regional park designation deliver the PfSH policy ambitions?

7.119 Designating new regional parks would contribute to most of the PfSH authorities’ ambitions summarised in **Chapter 2**, at least in part. Given the flexibility and creativity being used in other areas of the country to define broad areas of open countryside, towns and cities as regional parks, the creation of a new regional park in South Hampshire has the potential to protect significant proportions of South Hampshire’s unprotected open countryside, sensitive settlement gaps, areas of landscape sensitivity, green infrastructure and ecological habitats, which would in turn redirect most future development to existing urban areas. However, it is unlikely that all open countryside would justify protection, leaving scope for some settlement gaps, areas of landscape value, green infrastructure opportunity areas or areas in need of ecological protection/enhancement to remain unprotected.

7.120 **Table 7.6** lists the main strengths and weaknesses of regional designations.

Table 7.6: Strengths and weakness of regional park designations

	Regional parks provide a flexible mechanism through which to proactively deliver GI benefits, recreation and access provision and landscape enhancement addressing several PfSH policy ambitions together.
	Parks are in active use and require proactive management, which is likely to deliver multiple benefits in the long term.
	Regional parks can be flexible enough to include existing settlements and new development as well as open countryside facilitating both countryside enhancement and acceptable levels of appropriate development.

Weaknesses	A regional park would cover a discrete areas of South Hampshire and would therefore not protect all greenfield land from development, including all sensitive settlement gaps, landscapes, ecological assets and functionally linked land.
	Although a regional park would likely prohibit most forms of development, they would likely not prohibit development in the open countryside if such development could demonstrate it would facilitate or improve park facilities and services.
	Securing the land and finding the funds to deliver a regional park would be a significant financial undertaking.

Timescales for designating and adopting the policy options

7.123 PfSH is in the process of preparing a non-statutory high-level Joint Strategy designed to inform the constituent PfSH authorities' local plans and assist the authorities in meeting their Duty to Cooperate. As a non-statutory planning document, the Joint Strategy cannot dictate local planning policy, it can only be a material consideration in its definition at the local level.

7.124 The detailed contents of the Joint Strategy are unknown at this stage. For example, it is unclear whether the Joint Strategy will identify specific areas for development allocations in local plans or just agree the principles and proportions for growth to be implemented in each local plan area.

7.125 The latest PfSH Statement of Common Ground (October 2021) anticipates that a draft of the Joint Strategy will be presented to the Joint Committee in the autumn of 2022. It is unclear at this stage how long it will take to finalise the document, but work on the PfSH constituent local planning authorities emerging local plans is already underway. Some are more advanced than other, depending on how recently their adopted local plans were adopted.

Designating a new Green Belt

7.126 Establishing the exceptional circumstances for designating a new Green Belt requires a clear understanding of how much and where growth will be accommodated in the long term. An absence of this detail in the Joint Strategy will inhibit the ability of PfSH to establish the necessary exceptional circumstances for a new Green Belt.

7.127 Waiting until the definition of each PfSH authorities' next local plan to build a coherent exceptional circumstances case for designating a new Green Belt will likely make the process harder and longer to complete, as each authority will be working more independently and to differing plan periods.

7.128 A new Green Belt's extent would not be formally defined until all PfSH constituent planning authorities adopted local plans and associated proposals maps with its detailed boundaries clearly defined.

Defining and designating new local planning policy areas

7.129 The definition of the local alternatives to a Green Belt policy – areas of separation, landscape, GI and/or park policies – do not require the same exceptional circumstances needed to designate a new Green Belt. The process of justification for these local policies is arguably less complex and therefore less time-consuming, but the definition of alternative area-based designations would still require a

Notable locations for a potential regional park

7.121 Drawing on the findings of **Chapters 4, 5** and **7**, consideration could be given to the creation of a regional park centred on the remnants of the Forest of Bere, the sub-region's existing country parks and the planned South West Hampshire Forest Park in the Southern Test Valley, bordering Southampton City and Eastleigh Borough. Located in close proximity to both the New Forest National Park and South Downs National Park, the woodlands could represent a recreational gateway into the national parks. The regional park could also extend southwards along the sub-region's important river corridors of the Hamble, Itchen, Meon and Test towards to the Solent Coastline, the Chichester Harbour AONB and the setting of the New Forest National Park.

Next steps

7.122 To pursue the designation of a new regional park in South Hampshire the PfSH authorities' main priorities should be to:

- Contact the planning authorities neighbouring all PfSH constituent local authority boundaries to inform them of the authorities' intention to investigate the designation of a new regional park and lay the groundwork for their cooperation and consultation, and produce or update relevant Statements of Common Ground.
- Supplement the authorities' existing evidence bases to formally define the extent of a suitable regional park.
- Map the extent of the park.
- Identify funding opportunities and delivery mechanisms.
- Draft clear strategic policy for inclusion in the Joint Strategy, formally designating the new regional parks from reference and management through relevant PfSH authority local plans.

significant level of coordination and cooperation between the constituent authorities. It would still be important to establish the scope and broad areas of the local policy(s) within the Joint Strategy to ensure consistency in implementation at the local plan level. Consequently, waiting until the definition of each PFSH authorities' next local plan to build a coherent countryside protection and enhancement strategy would make the process harder and longer to complete, as each authority would be working more independently and to differing plan periods. There would also be less incentive to be consistent in the wording and implementation of such local policies.

Extending the National Parks and/or AONB

7.130 The most relevant and recent example of an extension to previously defined National Parks took place in the north west of England through the extension of the Lake District and Yorkshire Dales National Parks. The process began in early 2005 with the definition of areas of search, followed by four years of evidence gathering to define detailed boundary extension recommendations. The boundary extensions were first approved for consultation by Natural England in late 2009. A second round of consultation was undertaken 18 months later on a set of revised boundaries. This second set of boundary changes were subjected to Strategic Environmental Assessment (SEA) in line with the requirements of the SEA Regulations⁹⁷. Following this second round of consultation the Natural England Board concluded that the boundaries of the Yorkshire Dales and the Lake District National Parks should be extended and Variation Orders prepared. Natural England's Chair and Chief Executive signed the Designation Variation Orders on 17 January 2012 roughly seven years after the first evidence was gathered. The Variation Orders were placed on public deposit from 30 January to 16 March 2012. Following objections from local authorities during the deposit period, the Secretary of State convened a Public Inquiry which sat during June 2013. The inspector's report was submitted to the Secretary of State in late 2013, recommending only minor modifications to the boundaries of the extension. The decision to approve the extensions was made two years later by the secretary of state in 2015, with extensions coming into effect in August 2016, over 11 years after the extensions were first considered.

7.131 The New Forest National Park and South Downs National Park were relatively recently designated in 2005 and

2010, respectively. It is therefore unlikely that Natural England and the Secretary of State will consider extending these two designations at this time.

Future national policy

Planning for the Future White Paper

7.132 The 'Planning for the Future' White Paper⁹⁸ was released in August 2020 and sets out a range of far-reaching reforms to England's planning system designed to streamline the process of plan-making. These reforms may make it quicker or simpler to designate areas of open countryside in South Hampshire. They include a range of measures, including a shift to a 'zoning' system, whereby all land will be designated in local plans as either:

- Protected zones (which may include important areas of green space and open countryside), where development is restricted.
- Renewal zones (existing built areas), where smaller scale development will be appropriate.
- Growth zones – areas seen as suitable for 'suitable substantial development', with a role for design codes to determine the outcome.

7.133 Environmental constraints, including open countryside, landscape sensitivities and areas of high GBI value are likely to be a consideration in the definition of the protected zones. However, there is insufficient clarity in the current proposals to indicate how the process of allocating land into different zones will work. Local authorities will likely have to consider national policy, centralised housing targets and environmental constraints.

7.134 The Government response to consultation on the White Paper, and plans for bringing forward the Planning Bill, has been delayed. The response was originally expected in 2021, but has been delayed until at least spring 2022.

7.135 It is unclear at this stage how Green Belt policy will be compatible and complement these policy aspirations.

Levelling Up the United Kingdom White Paper

7.136 The 'Levelling Up the United Kingdom' White Paper⁹⁹ was released in February 2022. It sets out proposals for a

⁹⁷ The SEA Directive (2001/ 42/EC) and the Environmental Assessment of Plans and Programmes Regulations 2004 impose no requirement to carry out SEA on the proposed extensions. However, SEA was undertaken on a voluntary basis (as if the Directive and Regulations did apply) notwithstanding that in many cases the determination of future effects of designation cannot be assessed with certainty as they will largely be dependent on the content of the future plans, policies and projects of the National Park Authorities (NPAs), which will themselves be subject to SEA.

⁹⁸ HM Government, Planning For the Future White Paper. August 2020. Available at:

<https://www.gov.uk/government/consultations/planning-for-the-future>

⁹⁹ HM Government, Levelling Up the United Kingdom White Paper, February 2022. Available at:

<https://www.gov.uk/government/publications/levelling-up-the-united-kingdom>

new policy regime for ‘levelling up’ the quality of life and opportunities of all parts of the United Kingdom. The White Paper reinforces the Government’s commitment to *‘ensuring natural beauty is accessible to all..., with improved Green Belts around towns and cities, supported by Local Nature Recovery Strategies reflected in plan making, and woodland creation supported across the UK’*. No further details have been provided at this time.

Conclusions

7.137 South Hampshire’s open countryside is worth protecting; it has many landscape qualities and sensitivities in need of protection and enhancement. Delivering the necessary policy mechanisms and designations to effectively enhance all the landscape qualities of South Hampshire will take effort, time and financial resources.

7.138 No single designation or policy solution is likely to deliver both the level of protection and enhancement required. Designations that focus on prohibiting development, like Green Belt are arguably less likely to be successful in achieving PfSH’s ambitions than more proactive and positive policies, like regional parks and green infrastructure networks, designed to improve the multiple benefits and functions of the countryside, especially as the latter also create more reasons for prohibiting development in the long term.

Delivering a new Green Belt in South Hampshire

7.139 A fundamental characteristic of Green Belt is that it should be permanent. The designation of a new Green Belt in South Hampshire could only be pursued effectively once the PfSH authorities have agreed to and robustly evidenced how they plan to accommodate the growth needs of the sub-region over the next 30 years, i.e. at least two plan periods of growth. Only then will it be possible to answer the necessary policy tests for justifying a new Green Belt set out in national planning policy in full. **Table 7.7** summarises the main tests and the study’s preliminary findings on each:

Table 7.7: Preliminary answers to NPPF tests for justifying new Green Belt

Key NPPF Tests	Initial Green Belt Findings
Demonstrate why alternative policies would not be adequate.	Our preliminary analysis suggests that there are alternatives to Green Belt that would deliver PfSH’s policy ambitions at this stage.
Set out the major change in circumstances to make the	The substantial growth South Hampshire has received over the last 60 years is not unique in England. It is therefore not enough in isolation to potentially

designation necessary.	justify a Green Belt. Other unique circumstances would need to be found.
Communicate the consequences for sustainable development.	The PfSH assessment of Strategic Development Opportunity Areas (SDOAs) and associated Sustainability Appraisal work, as well as the local plan evidence bases of PfSH’s constituent local planning authorities will be key to demonstrating this.
Highlight the consistency of the new designation with neighbouring plan areas.	A new Green Belt has the potential to have cross-boundary implications beyond the PfSH authorities’ boundaries. Separate discussions and statements of common ground with neighbouring authorities will be required.

7.140 The absence of a forthcoming **statutory** Joint Plan covering the entirety of the PfSH area is an added complexity that comes with its own significant challenges and risks. In the event robust and convincing answers to the NPPF’s exceptional circumstances tests for a new Green Belt can be found, each constituent authority containing land proposed for designation as Green Belt would need to present them at their own Local Plan examinations. The failure of just one Local Plan to be adopted would at best significantly delay the delivery of a new Green Belt across South Hampshire and at worst undermine the whole exceptional circumstances case, preventing the delivery of the designation.

7.141 Finally, the approval of a new Green Belt now, decades after the designation of the last Green Belt, and after years of sustained housing under provision is likely to be politically controversial at the national level. It could catalyse a nationwide bid for Green Belt expansion, so even if a strong exceptional circumstances case could be made there is no guarantee it would be approved by the Secretary of State for Levelling Up, Housing and Communities.

7.142 **In the light of these initial findings with regards to Green Belt, it is recommended that the PfSH authorities pursue the scope and extent of an alternative mixture of sub-regional designations at this time.**

Alternatives to Green Belt

7.143 In the absence of a compelling case for a new Green Belt at this time, consideration should be given to a combination of alternative policies and designation. This could include a combined approach of designating new and expanded areas of separation, new country parks and/or a new, much larger regional park compatible with a wider green

infrastructure network implementation plan. This approach could help to ensure the delivery of a wider range of the PfSH ambitions – outlined in **Chapter 2**. Together, depending on the extent of the policy designations, these policy mechanisms could also contribute significantly to all five of the national Green Belt purposes by:

- Checking the unrestricted sprawl of the vast majority South Hampshire large built-up area (Green Belt Purpose 1) – particularly if a Regional Park was designated to the north of the M27.
- Preventing neighbouring towns merging into one another (Green Belt purpose 2) – through a strong areas of separation policy.
- Assisting in safeguarding the countryside from encroachment (Green Belt Purpose 3) – particularly through a GI or an extensive Regional Park designation.
- Preserving the setting and special character of historic towns (Green Belt Purpose 4) – by including the areas of importance to the setting of Portsmouth and Romsey in a designation.
- Assisting in urban regeneration, by encouraging the recycling of derelict and other urban land (Green Belt Purpose 5).

7.144 A carefully defined, combined policy approach could create an exciting opportunity to protect South Hampshire's most valued landscapes and GI opportunity areas from future development whilst also providing access to greenspace and recreation close to urban populations. The designations could also provide a gateway to the national parks and AONBs and a pressure valve for European ecological designations, conserving, enhancing and building the resilience of these local and regional assets in the face of South Hampshire's growth needs and climate change.

Appendix A
Legal Advice

PARTNERSHIP FOR SOUTH HAMPSHIRE
POTENTIAL SOUTH HAMPSHIRE GREEN BELT

ADVICE

1. I have been asked to advise the Partnership for South Hampshire (“PfSH”) concerning the prospect of successfully introducing through development plan policy a new green belt within South Hampshire. The PfSH comprises eleven local authorities within South Hampshire. These are the unitary authorities of Portsmouth and of Southampton together with district authorities of Eastleigh, East Hampshire, Fareham, Gosport, Havant, Test Valley, New Forest and Winchester, as well as the New Forest National Park Authority and Hampshire County Council.
2. I advised in consultation in respect of these instructions, most recently on 16 May 2022. On that occasion, I was asked to consider and advise whether, on the evidence presently available, the designation of a new green belt in South Hampshire was likely to be found to be consistent with national planning policy set out in the National Planning Policy Framework (“NPPF”) 2021 and thus successful secured through revisions to the development plans of the PfSH authorities. In advising in consultation on 16 May 2022, I had the benefit of a draft report prepared by LUC for the PfSH entitled “Green Belt/Green Infrastructure Designation Study Policy Options Review” (“LUC interim report”). Albeit in draft, at the time of advising on 16 May 2022 and now, that report is in an advance form.
3. It will be recognised that green belt is a longstanding planning policy designation in England and in Wales. Existing areas of land designated as green belt have been long established; no entirely new green belt has been introduced in recent decades, so far as I am aware.
4. As is recognised in the LUC interim report, the designation of land as a green belt is secured through planning policy introduced within revisions to a development plan or plans. As such, in principle, the opportunity exists for a local authority or authorities

to create a new green belt by introducing a designating policy to that effect through revisions to its development plan or plans.

5. However, any new development plan must, inter alia, be found sound following examination by the Secretary of State for Levelling-Up, Communities and Local Government. Then test of soundness is set out in the NPPF 2021 at para.35 and includes a requirement for consistency with national policy.
6. National policy concerning the designation of a new green belt is set out at NPPF para.139 and is very well established. In practice therefore, a development plan(s) which seek to create a new green belt is only likely to be found sound so as to be capable of adoption if para.139 of the NPPF is met.
7. Given its central importance to my advice, I set out NPPF para.139 in full. It provides as follows:

“The general extent of Green Belts across the country is already established. New Green Belts should only be established in exceptional circumstances, for example when planning for larger scale development such as new settlements or major urban extensions. Any proposals for new Green Belts should be set out in strategic policies, which should:

- a) demonstrate why normal planning and development management policies would not be adequate;
- b) set out whether any major changes in circumstances have made the adoption of this exceptional measure necessary;
- c) show what the consequences of the proposal would be for sustainable development;
- d) demonstrate the necessity for the Green Belt and its consistency with strategic policies for adjoining areas; and
- e) show how the Green Belt would meet the other objectives of the Framework.”

8. What is immediately apparent is that national policy requires “exceptional circumstances” to be demonstrated for the designation of a new green belt. This has long been a requirement of national policy and is consistent with a recognition that the extent of green belts in England is “already established”. It is fair to proceed on the basis that, so far as national planning policy is concerned, the expectation is that the designation of entirely new green belts will seldom be justified.
9. When this high level policy test is applied to South Hampshire and to the context which is very fully set out in the LUC interim report, it is difficult to identify, evidentially, what the exceptional circumstances are which justify an entirely new green belt to be

designated. There has certainly been substantial growth, particularly within and on the edge of existing settlements in South Hampshire. In that respect, South Hampshire is not unlike many other parts of England. I do not consider that this of itself would amount to an exceptional circumstance to justify, consistently with NPPF para.139, the designation of a new South Hampshire green belt. For the avoidance of doubt, the particular example of exceptional circumstances given in the NPPF para.139 – planning for a larger scale development such as a new settlement or major urban extension – is not engaged, so far as I am aware, by current proposals in South Hampshire and, in any event, such a large scale development would need to be shown to give rise to wider planning consequences so as to justify a new green belt designation in any event.

10. In terms of the particular requirements for designation of a new green belt set out as sub-paras.(a)-(e) within NPPF para.139 the starting point is, in my view, (a), which requires a demonstration as to why “normal planning and development management policies would not be adequate” to meet the planning objectives sought to be met by a new green belt. The LUC interim report addresses comprehensively this matter within chapter 7. LUC’s conclusion is that there are adequate alternative policy mechanisms to achieve the objectives sought to be met by a new South Hampshire green belt, including the protection of open countryside between settlements. The LUC analysis is, in my view, clear and compelling. On the basis of that analysis, I consider it highly unlikely that PfSH will be in a position to meet the evidential requirement of NPPF 139(a) so as show that a new green belt designation is sound.
11. With regard to NPPF para.139(b) there is in my view no “major change in circumstances” or at least a sufficient change in circumstances to justify as necessary the exceptional measure of introducing a new green belt.
12. NPPF para.139(c) and (e) raise similar issues. At present, without clear evidence of future development needs within each of the component authorities of PfSH and how these needs are sustainably to be met, the consequences of the powerful policy of restraint which would arise from a green belt designation on meeting future development needs and delivering sustainable development in accordance with the NPPF as a whole cannot properly, at this stage, be assessed or confirmed. A new green

belt designation is unlikely now to be capable to being demonstrated to be justified consistent with NPPF para.139(c) and (e).

13. With regard to NPPF para.139(d), given what is set out above and within the LUC draft report, I am doubtful whether a new South Hampshire green belt can be shown to be “necessary”, particularly given that the objectives which are justifiably sought to be met are capable by the designation of a new green belt are capable of being achieved by other policy means.
14. In conclusion therefore, I do not consider it likely that the introduction of a new South Hampshire green belt will be found to be consistent with national planning policy and therefore that a development plan/plans that sought to introduce, through policy, a new green belt will be found sound.
15. Moreover, there is a practical obstacle to delivery of a new green belt in South Hampshire which would involve green belt designation within several individual local plans. Historically, new areas of green belts have been introduced initially through strategic level plans, where the area of proposed designation involves multiple local authorities. In South Hampshire, in the absence of any strategic level plan or agreement between local authorities to produce a joint plan, a new green belt would need to be introduced through policy designations in individual local plans. This presents a serious procedural challenge to securing the designation of a green belt successfully and in a coordinated and timely manner; to create a new green belt on such a basis will require each individual local plan, which proposes to designate part of the green belt, to be found sound. Given the risk of an individual plan not being adopted, whether by reason of soundness concerns as to the green belt policy or otherwise, to seek to introduce a new green belt on such a basis is likely to be highly problematic and to risk giving rise to a situation whereby any new green belt is incomplete or is introduced on a prolonged and piecemeal basis.
16. I trust that the above is a sufficient summary of the advice given in consultation on 16 May 2022. I would of course be pleased to advise further or discuss further any aspect of that advice, should that be of assistance.

DOUGLAS EDWARDS QC

D. Edwards

Francis Taylor Building,
Temple, London. EC4Y 7BY.
30 May 2022.