

Town and Country Planning Act 1990 –Section 78
Town and Country Planning (Development Management Procedure) (England) Order 2013
Town and Country Planning (Inquiries Procedure) (England) Rules 2002

Appeal by Gladman Developments Ltd

Land at Halterworth Lane, Romsey

**Against the Refusal of Planning Permission by
Test Valley Borough Council on the Application for:**

“Outline planning application for demolition of existing buildings and erection of up to 270 dwellings, including affordable housing, with land for the potential future expansion of Halterworth Primary School, public open space, structural planting and landscaping, sustainable drainage system (SuDS) and vehicular access points. All matters reserved except for means of access”

Appellant Statement of Case



October 2024

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APPENDICES

Appendix 1 PFSH Spatial Position Statement (December 2023)

1 JUSTIFICATION FOR INQUIRY PROCEDURE

- 1.1.1 It is considered by the Appellant that a public inquiry is the appropriate procedure for the appeal to be assessed with reference to the PINS Procedural Guide: Planning appeals – England (updated 17 September 2024).
- 1.1.2 It is the Appellant's case that there is a need for evidence to be fully tested on the matters which are likely to remain in dispute covering the technical disciplines of landscape, housing land supply, planning and highways. The complexity of the issues to be discussed need to be formally addressed in a coherent manner through direct questioning and interrogation.
- 1.1.3 It is expected that detailed evidence will need to be adduced by the parties and that it will be necessary to use expert witnesses to advance the respective cases on the above issues. Some of the evidence will be of a specialist and technical nature and the judgements made by individual witnesses will be material to the consideration of planning policy compliance and the overall planning balancing exercise. In order that these potentially determinative matters are properly assessed the Appellant anticipates that legal submissions will be necessary.
- 1.1.4 Overall, it is the view of the Appellant that it will be necessary for the main parties to be represented by an advocate and that cross-examination of the evidence will be required to test the respective positions of the parties and assist the Inspector in making a decision.
- 1.1.5 Furthermore, there is vast public interest in this application, as demonstrated by 148 representations received as outlined within the committee report (CD5.1) the number of formal representations.
- 1.1.6 It is considered that to address all matters, 6 sitting days will be required to ensure all technical matters can be fully explored and any Rule 6 and interested parties can be heard. This exceeds the single day usually reserved for a hearing. The procedural guidance therefore suggests that a public inquiry is necessary.

2 INTRODUCTION

2.1 Context

2.1.1 This Statement of Case is submitted by Gladman (the Appellant) and it relates to an appeal against Test Valley Borough Council's (TVBC) decision to refuse the outline application for:

“Outline planning application for demolition of existing buildings and erection of up to 270 dwellings, including affordable housing, with land for the potential future expansion of Halterworth Primary School, public open space, structural planting and landscaping, sustainable drainage system (SuDS) and vehicular access points. All matters reserved except for means of access”

2.1.2 A draft list of core documents has been submitted as part of this appeal. These documents may be added to by the Appellant or Council during the course of the appeal.

2.2 Site and Surroundings

2.2.1 Land at Halterworth Lane ('the appeal site'), comprises 12.8ha of agricultural fields and existing hedgerow planting, and is located to the east of Halterworth Lane and north of Halterworth Primary School. The site is located adjacent to the built form of Romsey with existing residential development located to the west and south of the site.

2.2.2 Romsey is identified as a "Major Centre" under Policy COM2 of the adopted Test Valley Revised Local Plan DPD. Major centres are the top tier settlements within the authority and are identified as being suitable areas for growth.

2.2.3 A full description of the appeal site and surroundings is set out in the Statement of Common Ground for agreement with the Council.

2.3 Background

2.3.1 The outline planning application for the proposed development was validated by Test Valley Borough Council on 24/01/2024 (Application ref: 24/00174/OUTS). The application was supported by a comprehensive suite of technical reports and Environmental Statement in accordance with the Council's planning application validation requirements, are these are set out in the Planning and Affordable Housing Statement that accompanied the application (CD1.17). It has since been confirmed that the application is not an EIA application (CD5.1).

- 2.3.2 The Appellant undertook a public consultation exercise prior to submission. The process of engagement allowed the Appellant to consider the concerns and suggestions of interested parties through the application process. As part of this consultation the Appellant had discussions with representatives from Halterworth Primary School specifically in relation to the provision of approximately 1ha of land on the appeal site which could facilitate the expansion of the Primary School and on the provision of car parking facilities for parents within the appeal site, both of these were welcomed by the Primary School's representative. Full details of the public consultation exercise are also set out in the Statement of Community Involvement (CD1.18).
- 2.3.3 Throughout the determination process, the Appellant has sought to engage with Council officers and consultees to address any technical objections or comments during the planning application process, as far as possible. Despite this, the Council indicated that they would be issuing a delegated refusal at the end of the 13 week statutory determination period, without allowing extensions of time to allow for any outstanding technical matters to be resolved or for the legal agreement to be discussed.
- 2.3.4 The application was refused by Test Valley Borough Council on 23rd April 2024 with 14 Reasons for Refusal (RfR). The RfRs cover the following topics, the principle of development with regard to the site being outside of the defined settlement boundary, diminishment of the Romsey North Baddesley local gap, landscape character impact, adverse effect on the function, safety and character of local highway network and lack of an agreed section 106 agreement to secure the necessary infrastructure contributions.
- 2.3.5 A full copy of the Decision Notice and RfRs is enclosed at CD5.2.

2.4 Summary of Appeal Proposals

- 2.4.1 If allowed, the appeal proposals would provide:
- Up to 270 new homes, comprising up to 162 market and up to 108 affordable dwellings (40%).
 - Vehicular access points onto Halterworth Lane.
 - 4.45ha of formal and informal open space including structural landscaping, woodland and hedgerow planting, wildlife pond, and the retention and positive management of key landscape features.
 - 1.09ha of land for potential future expansion of Halterworth Primary School.
 - 2 Locally Equipped Areas of Play (LEAP).

- Demolition of the existing buildings in the northern parcel of the site.
- Surface upgrades to Public Right of Way – Footpath 198/15/1.
- A Sustainable Drainage System (SuDS) to ensure the proper management of surface water.
- Potential primary school and visitor car parking laybys provided within the site.
- Upgrades to closest pair of bus stops on Halterworth Lane to include raised boarding areas, shelter, seating and timetable information to encourage bus travel by future and existing residents.
- Section 106 and CIL contributions, as detailed in Section 6.

2.5 Planning History

2.5.1 The site has not been subject to any previous planning application of relevance to this appeal.

2.6 Statement of Common Ground

2.6.1 A draft Statement of Common Ground (SoCG) is submitted with this appeal. It is expected a signed SoCG will be available prior to the inquiry commencing.

2.6.2 Further Statements of Common Ground on technical matters, such as highways, landscape, housing land supply and ecology may be produced should this be necessary to assist the Inspector in highlighting any areas of agreement or disagreement between the parties.

3 THE DEVELOPMENT PLAN

3.1 Test Valley Revised Local Plan 2011-2029 (Adopted 2016)

3.1.1 Under the provisions of Section 38(6) of the Planning and Compulsory Purchase Act 2004, planning applications should be determined in accordance with the adopted development plan unless material considerations indicate otherwise.

3.1.2 In this instance, the adopted development plan, as applicable to the determination of the appeal application, consists of the Test Valley Borough Revised Local Plan which was adopted in January 2016, and it sets out planning policies and proposals for 2011 up to 2029.

3.1.3 In refusing planning permission, the Council's Decision Notice (CD5.02) alleges conflict between the appeal proposals and the following policies of the Local Plan:

- COM2 (Settlement Hierarchy)
- COM7 (Affordable Housing)
- COM15 (Infrastructure)
- E2 (Protect, Conserve and Enhance the Landscape Character of the Borough)
- E3 (Local Gaps)
- E5 (Biodiversity)
- E7 (Water Management)
- LHW1 (Public Open Space)
- T1 (Managing Movement)
- ST1 (Skills and Training)

3.1.4 A full list of the planning policies relevant to the appeal proposal is enclosed in the submitted Statement of Common Ground for agreement with the Council.

3.1.5 The Appellant will demonstrate that the appeal proposals are generally compliant with all relevant development plan policies that can be considered up-to-date for the purposes of decision-making and would represent a logical and sustainable extension to the existing settlement.

4 OTHER MATERIAL CONSIDERATIONS

4.1 The National Planning Policy Framework

4.1.1 The Framework is an important material consideration in the determination of this appeal. The Appellant will adduce evidence to demonstrate that the appeal proposal responds to the national policy ambition to significantly boost the supply of housing and represents sustainable development as defined within the Framework.

4.1.2 Through the NPPF, the government has made clear its expectation that the planning system will positively embrace well-conceived development to deliver the housing and economic growth needed to create inclusive and mixed communities, so that sustainable development is pursued in a positive way.

The Presumption in Favour of Sustainable Development

4.1.3 Section 2 of the Framework outlines the overarching objectives that constitute sustainable development, these being economic, social and environment objectives. In order to achieve sustainable development paragraph 11, which sits at the heart of the Framework, establishes what this means for decision making.

4.1.4 Paragraphs 4.15, 4.1.6 and 4.1.7 take each of the overarching objectives for sustainable development in turn,

An economic role

4.1.5 Evidence will be adduced to demonstrate the beneficial economic impacts of the appeal proposal. Delivery of new market and affordable homes now in Romsey is a key contributor that will enable the town and Test Valley Borough to promote and sustain a strong, responsive and competitive economy.

A social role

4.1.6 It will be demonstrated that the appeal proposals will deliver new homes of the right type and mix, in the right place and at the right time to meet market and affordable housing need and in turn will support growth aspirations. Without a sufficient supply of new homes, Test Valley Borough Council cannot meet the needs of present or future generations. The proposals also include the provision of 1ha of land which is proposed to be gifted to Halterworth Primary School as part of the development package, this enables the Primary School to have the opportunity to expand at any suitable point in time. It will be demonstrated that the site is

located in an accessible and sustainable location close to key services and facilities, and the wider area, that will help support the health, social and cultural wellbeing of Romsey, Test Valley and Hampshire.

An environmental role

4.1.7 It will be demonstrated that the appeal proposals have no unacceptable adverse effects in respect of environmental considerations. The proposals involve the provision of a significant area of informal and formal public open space, landscaping and ecological mitigation works which together deliver a net gain to biodiversity.

Summary

4.1.8 The appeal proposals comprise 'sustainable development' through the inclusion of the following provisions as part of the development package:

- Providing market and affordable housing in the short term which can make a valuable contribution towards national and local objectives for economic growth;
- Benefitting from a real choice of sustainable transport modes, as demonstrated through a Travel Plan, as well as providing enhancements that will promote travel by sustainable modes;
- Contributing towards housing choice and the mix of housing in the area, making effective use of land and making a contribution towards meeting affordable housing needs;
- Providing approximately 1ha of land to enable the expansion of education services at Halterworth Primary School, at a suitable point in time;
- Being capable of delivering a well-designed, beautiful development;
- Promoting healthy communities through integration with the existing settlement and the provision of open space, including new recreational walking routes;
- Being located on land at low risk of flooding and ensuring that the development will not increase flood risk downstream;
- Being resilient to the challenge of climate change; and

4.2 Written Ministerial Statement and Consultation Draft NPPF (July 2024)

4.2.1 The Written Ministerial Statement (WMS) made by the Deputy Prime Minister and Secretary of State for Housing, Communities & Local Government, the Rt Hon Angela Rayner MP, to the House of Commons, and draft revised version of the Framework published for consultation on 30th July 2024 are material considerations in the determination of this appeal and clearly

set the tone and direction of the recently elected Government and their approach to planning reform and future growth.

Written Ministerial Statement - 30th July 2024 "Building the homes we need"

4.2.2 The terms of the WMS are a clear statement of the new Government's policy. Of direct relevance is the clear tone in central Government's commitment to improving affordability, turbocharging growth and in building the 1.5 million homes they have committed to deliver over the next five years. This statement reaffirms that the country is in "the most acute housing crisis in living memory."

4.2.3 The WMS makes clear that the Government are seeking to strengthen the general presumption in favour of sustainable development, again outlining their strong commitment to ensuring that planning permission is granted on suitable sites in sustainable locations.

4.2.4 The WMS is clear in its conclusion that "**there is no time to waste. It is time to get on with building 1.5 million homes**". It is the Appellant's case that the appeal proposals would make an important contribution in enabling the delivery of up to 270 market and affordable homes in the immediate short term. This wholly accords with Government policy as set out in the WMS; that building new homes is crucial in achieving the stability, investment and reform the Country is now striving to achieve.

4.2.5 It is in this context that the Appellant considers significant weight should be accorded to the content of the WMS, particularly its tone and direction indicating that sustainable developments are to be supported immediately and to enable delivery as quickly as possible.

2024 consultation Draft of the National Planning Policy Framework

4.2.6 The draft NPPF provides policy mechanisms to support the goals of the Government expressed within the WMS. As already mentioned, within the WMS the SoS emphasises the intention to strengthen the presumption in favour of sustainable development. The presumption remains to be found at paragraph 11 of the consultation draft of the Framework.

4.2.7 The draft Framework is accompanied by a lengthy consultation statement which sets out the Government's thinking and provides detailed context. The consultation statement simply and powerfully reiterates the function of the presumption (emphasis added):

"The primary function of the presumption is to provide a fallback to encourage planning permission to be granted where plan policies are not up-to-date, including where there is an insufficient supply of land. It broadly does this in two ways. It brings land into scope of potential

development where it has not been specifically allocated for development (e.g. a site on the edge of existing settlements), or where land is allocated for another purpose (e.g. where housing may be proposed on a site allocated for employment uses). Additionally, it 'tilts the balance' towards approval by making clear that permission should be granted unless doing so would cut across protections for safeguarded areas, like National Parks and habitat sites, or the adverse impacts would 'significantly and demonstrably' outweigh the benefits when assessed against the NPPF taken as a whole.¹"

- 4.2.8 This explanation of the presumption aligns with the Appellant's case in this appeal. Applied in a staged approach; firstly, the development plan is out of date, triggering the presumption **and** the Council are unable to demonstrate a sufficient supply of land for housing as such, permission should be encouraged. Secondly, the Appellant's case is consistent with the example given in parentheses, i.e. edge of settlement proposals.
- 4.2.9 The proposed change to further bolster paragraph 11 (d, (ii)) with direct reference to chapters 9 and 12, reiterate the Government's commitment to achieving developments which are in sustainable locations and will be of a high-quality design.
- 4.2.10 The consultation draft of the Framework, reinstates the need for LPAs to include a 5% buffer to their 5 year housing land supply calculations in order to account for fluctuations and to ensure choice and competition within the market.
- 4.2.11 While it is acknowledged that the weight to be afforded to the draft Framework is limited at this stage, it is anticipated that by the time of the inquiry into this appeal it will be formally published. The Appellant reserves the right to adduce further evidence in due course.
- 4.2.12 Also, alongside the draft consultation Framework, the government is consulting upon changes to the standard method which sets the housing requirement for Test Valley. This is only likely to exacerbate the land supply issues within the Borough and evidence will be adduced to demonstrate this. Within the adopted Test Valley Local Plan the housing requirement is set at 10,584 dwellings borough wide between 2011-2029, which equates to 588dpa. The current standard method figure (based upon the 2014 household projections) for Test Valley is 524dpa. The proposed stock based figure given as part of the NPPF consultation increases the housing requirement for Test Valley to 921dpa, demonstrating the significant increase

¹ Paragraph 14 of the Proposed reforms to the National Planning Policy Framework and other changes to the planning system Published 30 July 2024. Available at: <https://www.gov.uk/government/consultations/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system#chapter-3--planning-for-the-homes-we-need>

proposed by the NPPF consultation and the indication that the area is suitable to accommodate growth.

4.3 Housing Land Supply

4.3.1 Paragraph 77 of the Framework states that unless a local planning authority has adopted a plan within the last five years (which is not the case here), they should identify and update annually a supply of specific deliverable sites sufficient to provide either a minimum of five years' worth of housing, or a minimum of four years' worth of housing (against their five year requirement, as clarified through PPG) if the provisions in paragraph 226 apply. The supply should be demonstrated against either the housing requirement set out in adopted strategic policies, or against the local housing need where the strategic policies are more than five years old- unless the strategic policies have been reviewed and found not to require updating. Paragraph 226 states that if a local planning authority has an emerging local plan that has either been submitted for examination or has reached Regulation 18 or 19 stage, including both a policies map and proposed allocations towards meeting housing need, they must only demonstrate a four year supply of housing.

4.3.2 The Appellant considers in this case that the Council is required to demonstrate a five year supply of housing. It is acknowledged that the Council has published a plan for the purposes of Regulation 18 consultation with a policies map and allocations towards meeting its housing need, however the following statement has recently been published on the Council's website:

"The announcement of the Government's reforms and consultation on draft changes to the NPPF propose a significant increase to our housing need and transitional arrangements **that mean we cannot take forward the draft Local Plan in its current form**. The Council is current considering the implications and consequences for taking forward the draft Local Plan, but inevitably this will lead to a revised timescale in due course". [emphasis added]

4.3.3 It is clear from this statement that the Council no longer considers that the Regulation 18 draft Local Plan upon which it undertook consultation is 'fit for purpose' in terms of meeting the housing need identified in the draft Framework, and that it will in due course need to consult upon a revised Regulation 18 draft plan which contains site allocations to meet that housing need. As such, the Appellant will argue that in this case the Council should be required to identify a **five year** housing land supply. The Appellant will refer to relevant appeal decisions to support its argument in this regard.

4.3.4 The Council, having undertaken a 'Regulation 10a' review of its adopted local plan in 2021, continues to measure its housing land supply against the adopted strategic policies in that local plan, in spite of the plan having been adopted over five years ago. The housing requirement, as identified in policy COM1, splits the requirement into two housing market areas, Northern Test Valley, and Southern Test Valley. The appeal site lies within the Southern housing market area.

4.3.5 However, the Appellant will argue that the new Government's proposed stock based standard method for calculating local housing need identifies a much higher housing need across Test Valley than provided for within adopted strategic policies. It will therefore be advanced that irrespective of the Regulation 10a review, Policy COM1 is now out of date and as such does not represent a sound basis against which to calculate the area's housing land supply. In the absence of an up-to-date plan, paragraph 77 of the Framework therefore requires that housing land supply be calculated against local housing need using the Government standard method. This standard method does not provide any exceptions for housing land supply to be calculated on any other basis than a local authority-wide one, and as such in the absence of up-to-date strategic policies which seek to distribute the council's up-to-date housing need on an alternative basis, housing land supply must be calculated on a borough-wide basis. The Appellant will rely upon relevant appeal decisions and case law to support its propositions in this regard.

4.3.6 Notwithstanding the above, as a factual position the Council's latest position statement of 1st April 2023 claims that the Housing Land Supply position for southern Test Valley was 7.01 years. Without prejudice to the Appellant's in-principle arguments in relation to the correct housing requirement as made out above, the Appellant has also reviewed the Council's latest published housing land supply statement and believes it represents an over-estimated of the true deliverable land supply position in the borough. The Appellant will adduce evidence to support this contention.

4.3.7 In summary, the Appellant will adduce evidence to demonstrate that when correctly assessed, the Council is unable to demonstrate a sufficient housing land supply and that the extent of the housing shortfall and housing land supply situation is an important material consideration in this case.

4.4 Test Valley Draft Local Plan 2040

4.4.1 The Council are working on a new Local Plan to cover the period up to 2040. This emerging plan is currently at an early stage with the Issues and Options Consultation taking place in

2018, the Refined Issues and Options in 2020 and the Stage 1 Regulation 18 in 2022. Stage 2 of the Regulation 18 Consultation opened on 6th February 2024 and closed 2nd April 2024.

4.4.2 Both the Stage 1 and Stage 2 Regulation 18 consultation material continued to identify Romsey as being a tier 1 settlement in the draft settlement hierarchy, confirming the Council's acknowledgement that Romsey is suitable to accommodate further growth reflecting that it benefits from, alongside Andover in the north of the Borough, the widest range and number of facilities to meet local communities' needs.

4.4.3 The Local Development Scheme published in November 2023 outlines that the Council intends to carry out a Regulation 19 consultation on the Draft Plan in Quarter 1 2025 and hopes that the Plan can be submitted for examination in Quarter 2 2025.

4.4.4 However, as set out above, since the revised NPPF was published for consultation, the Council have expressed that Draft Local Plan cannot be taken forward in its current form and the timetable to the Draft Local Plan is therefore likely to be delayed to that outlined in the formal LDS. On the basis that the Draft Local Plan is in early stages of its preparation and that it is anticipated that significant changes may be made, negligible weight can be attributed to this plan for decision-taking purposes.

4.5 Partnership for South Hampshire

4.5.1 It is worth noting that on a strategic level, Test Valley Borough Council are one of the twelve local authorities working collaboratively under the title of the Partnership for South Hampshire (PFSH)

4.5.2 In December 2023, PFSH published a proposed Spatial Position Statement [Appendix 1] which seeks to focus new housing growth on cities and towns first that can be integrated with existing transport networks.

4.5.3 To address some of the existing housing shortfall in South Hampshire, Broad Areas of Search for Growth have been identified to deliver approximately 9,700 homes with further work to be advanced through individual local plans for each authority. For Test Valley, "East of Romsey" has been identified as one of these Broad Areas of Search for growth within the Spatial Position Statement [Appendix 1] which includes the appeal site.

4.5.4 The Stage 2 of the Regulation 18 draft of the Test Valley Local Plan acknowledges that the Council is part of the partnership and that there is agreement that the local plans within each authority should consider the unmet need collaboratively. Further the Stage 2 Regulation 18

Draft Plan states that broad areas of search were identified which could be considered in the future to help address any remaining shortfall in supply. Reiterating that whether these sites are progressed, is to be considered and decided by each of the individual Local Planning Authorities through the preparation of the respective Local Plans. The Stage 2 Regulation 18 Draft Plan (paragraphs 3.60 – 3.63) addresses the topic of unmet needs and confirms that the Council is aware that neighbouring authorities have formally requested assistance, however as the neighbouring authorities have not provided the Council with further evidence, within the Draft Test Valley Local Plan, there has been no uplift added to the housing requirement. The Appellant will adduce further evidence on this matter, dependent on the position at the time of the appeal event.

4.6 Other Documents

4.6.1 The Appellant may also refer to the following policy documents:

- Supplementary Planning Documents/Guidance.
- Emerging Local Plan Evidence Base.
- Planning Decisions/Appeal Decisions/ Legal Judgements – these will be agreed with the Council and provided as Core Documents.

5 RESPONSE TO THE COUNCIL'S REASONS FOR REFUSAL

5.1 Introduction

5.1.1 This section of the Statement of Case sets out the Appellant's position in relation to the Council's Reasons for Refusal, provided in Section 1 and the Decision Notice (CD5.1).

5.2 Reason for Refusal 1

5.2.1 The first reason for refusal is set out below:

'This site is located in the defined countryside (in the adopted Local Plan) and is not included as a preferred site that might deliver part of the Borough's future housing requirement and therefore falls outside of the strategic direction of the Local Planning Authority as defined within the Regulation 18 Draft Local Plan proposals for 2040. It is not a preferred site and is not required within the plan period. In a plan led system the proposal represents unjustified development in the countryside for which there is no overriding need. The application is therefore contrary to Policy COM2 of the Test Valley Borough Revised Local Plan (2016) and guidance in the National Planning Policy Framework (2023).'

5.2.2 This RfR refers to the fact that the appeal site is defined as countryside and outside of the settlement (albeit adjacent to) the built up area boundary for Romsey, as defined by the current Local Plan. There is no disagreement about this, as a statement of fact. The Appellant therefore acknowledges that the proposals are in conflict with Policy COM2, but it does not agree that this conflict results in a harm of enough weight to outweigh the numerous and ranging benefits of the proposal.

5.2.3 In addition to this the Appellant will adduce evidence to demonstrate that the current built up area boundaries are out of date by virtue of them being unable to accommodate local housing needs. In this context, it is the Appellant's position that the fact that the appeal site lies outside of the out of date settlement boundary is not in itself a reasonable basis for objecting to the appeal proposal.

5.2.4 Given the emerging plan is at a relatively early stage in its preparation and there are unresolved issues to be addressed, especially in regards to housing needs, any conflict with the draft plan should be given negligible weight.

5.3 Reason for Refusal 2

5.3.1 The second reason for refusal and its relevant policy is as below:

‘Through the combination of the physical and visual diminishment of the local gap a detrimental impact on the landscape character would be created. The proposal undermines the strategic direction of the regulation 18 Draft Local Plan proposals for 2040 and the Test Valley Borough Revised Local Plan (2016). The proposal would not protect, conserve and enhance the landscape character of the Borough, ensure the health and future retention of important landscape features, and would physically and visually diminish the local gap creating a coalescence of settlements contrary to policies COM2, E2 and E3 of the Test Valley Borough Revised Local Plan (2016).’

5.3.2 Again, within this reason for refusal the Council are placing some weight upon the draft plan, which can only be given negligible weight. The Appellant will seek to adduce further evidence upon the evidence base underpinning draft plan, specifically the Local Gaps Study (December 2023) and differences between the conclusions of this Study and the Draft Local Plan.

5.3.3 Policy E3 of the Test Valley Local Plan (2016) seek to retain Local Gaps, in this case the Site is located within the gap defined within Policy E3 between Romsey and North Baddesley. Policy E3 states that development within Local Gaps will be permitted provided that it would not diminish the physical separation and/or visual separation and it would not individually or cumulatively with other existing or proposed development compromise the integrity of the gap. It is the Appellant’s view that when put into practice the wording of Policy E3 is not compliant with the Framework. The Appellant will seek to adduce further evidence to the extent that Policy E3 can be deemed as being compliant and up to date.

5.3.4 Through this appeal the Appellant will attest the appeal site’s contribution to the Local Gap are insignificant. Development of this site would not compromise the extensive gap that would remain largely undeveloped and that there is no increased risk of coalescence arising between Romsey and North Baddesley by developing the appeal site.

5.3.5 Evidence will be given to demonstrate that the site’s landscape character could absorb change through the introduction of high-quality development as presented by the development framework plan. It will be demonstrated that any conflict with the purposes of the gap is limited such that overall.

5.3.6 Policy E2 concerns the protection, conservation and enhancement of the landscape character of the Borough, a number of criteria are listed which if met it is outlined that development

will be permitted. As demonstrated within the Landscape and Visual Appraisal (CD1.7) the proposed development complies with policy E2 of the adopted Test Valley Local Plan. Further evidence will be adduced on the matter of landscape and compliance with Policy E2 as part of the inquiry process.

5.4 Reason for Refusal 3

5.4.1 The third reason for refusal put forward by the council is as follows:

'In the absence of a legal agreement to secure the provision of affordable housing, the proposed development fails to provide sufficient housing required to serve the needs of the existing and future population and thereby exacerbates a current, quantifiable, shortfall in the supply of such housing. The proposal is contrary to policy COM7 of the Test Valley Borough Revised Local Plan (2016) and the Infrastructure and Developer Contributions Supplementary Planning Document.'

5.4.2 The Appellant will, by the time of inquiry, have progressed a S106 that includes provisions for affordable housing and any other associated infrastructure costs and therefore Policy COM7 and the Infrastructure and Developer Contributions SPD will be complied with. In this context, it is reasonably expected that RfR3 will 'fall away'.

5.5 Reason for Refusal 4

5.5.1 The fourth reason for refusal put forward by the council is as follows:

'The proposal would give rise to an adverse effect on the function, safety and character of the local highway network. There is a lack of clarity in relation to assessment and amendments requested by the Highway Authority which includes vehicle access proposals, suitable sustainable modes improvements, clarity around school parking proposals, confirmation of committed development assessed, Cycle Level of Service assessment of A27/Botley Road/Premier Way roundabout, and amendments to Travel Plan. The proposal would therefore result in unnecessary additional burden being placed on existing highway provision and would create an adverse impact on the function, safety and character of and accessibility to the local highway network. The location would not be connected with existing and proposed pedestrian cycle and public transport links and would not minimise its impact on the highway and rights of way network. This would be to the overall detriment of the area and pedestrian, cycle or public transport users of the highway. No legal agreement has been secured to address the above requirements and the proposal is contrary to policy T1 of the Test Valley Borough

Revised Local Plan (2016), and the Infrastructure and Developer Contributions Supplementary Planning Document.'

5.5.2 As set out in the Transport Assessment which was submitted as Appendix 6.2 of the Environmental Statement (CD1.24), the accessibility of the site and improvements in the form of new footway connections comply with policy T1 and the Infrastructure and Developer Contributions SPD. The Appellant will adduce evidence to demonstrate that the proposals will not have an unacceptable impact on highway safety and accessibility to the local highway network and comply with policy T1 and the Infrastructure and Developer Contributions Supplementary Planning Document.

5.5.3 It is Gladman's intention to work with the Hampshire Highways prior to the appeal event to narrow down the issues in dispute in relation to highways.

5.5.4 Gladman will, by the time of inquiry, have progressed a S106 that includes a provision to secure a financial contribution towards any necessary highway requirements.

5.6 Reason for Refusal 5

5.6.1 The fifth reason for refusal put forward by the council is as follows:

'In the absence of an agreed specification of work and / or a suitable financial contribution towards improving the useability of this route to service future residents, the proposed development fails to provide sufficient rights of way provision required to serve the needs of the future population and places an unnecessary unjustified burden on the public right of way network. The proposal is considered to be contrary to Test Valley Borough Local Plan - Policy T1 and the NPPF para 104.'

5.6.2 As set out in the Transport Assessment which was submitted as Appendix 6.2 of the Environmental Statement (CD1.24), the development proposals conform to national and local policy guidance and complied with policy T1 of the adopted Local Plan and provide footway links for pedestrians contrary to the reason for refusal. Gladman will, by the time of inquiry, have progressed a S106 that includes provisions and contributions towards improving the useability of this route for future residents. In this context, it is reasonably expected that RfR5 will 'fall away'.

5.7 Reason for Refusal 6

5.7.1 The sixth reason for refusal put forward by the council is as follows:

'In the absence of a legal agreement to secure the provision of a financial contribution towards off-site public open space provision, the proposed development fails to provide sufficient public open space required to serve the needs of the future population. The proposal would therefore result in unnecessary additional burden being placed on existing public open space provision adversely affecting the function and quality of these facilities, to the overall detriment of the area and users of the open space. The proposal is contrary to policy LHW1 of the Test Valley Borough Revised Local Plan (2016), and the Infrastructure and Developer Contributions Supplementary Planning Document.'

5.7.2 Within the response from the Policy Officer (CD3.13) the requirements outlined within Policy LHW1 are stated in relation to the proposed development. The DFP (CD6.2) shows that it is the Appellants intention to provide a financial contribution towards outdoor sports facilities and allotments to enhance the existing facilities in Romsey rather than seeking to provide this on the development site. No costings have been provided to the Appellant however subject to this being CIL compliant this will form part of the legal agreement.

5.7.3 The Appellant acknowledges that the proposed development does fall short of the required space for children and teenagers on the development site, the development package does include two LEAPs on the site and seeks to gift approximately 1ha of land to Halterworth Primary School. However, again a suitable off site contribution could be provided to enhance existing facilities in the local area for children and teenagers to ensure that these spaces are maintained and will still function to a high standard.

5.7.4 Subject to the agreement of off-site contributions being included within the S106 agreement, it is anticipated that RfR 6 will be addressed and will fall away.

5.8 Reason for Refusal 7

5.8.1 The seventh reason for refusal put forward by the council is as follows:

'In the absence of a legal agreement to secure the provision of both the phased delivery of new facilities and/or a financial contribution towards on-site public open space provision in the form of outdoor sports facilities, parks and gardens, informal recreation, provision for children and teenagers and allotments, the proposed development fails to provide sufficient public open space required to serve the needs of the future population. The proposal would therefore result in unnecessary additional burden being placed on existing public open space provision adversely affecting the function and quality of

these facilities, to the overall detriment of the area and users of the open space. The proposal is contrary to policy LHW1 of the Test Valley Borough Revised Local Plan (2016), and the Infrastructure and Developer Contributions Supplementary Planning Document.'

5.8.2 As outlined in the Policy consultee response (CD3.13) the requirement for provision of open space for the proposed development is 1.94ha to comply with policy LHW1. The proposed development as shown on the Development Framework Plan (CD6.2) is providing 4.81ha of green infrastructure including informal and formal open space, 2 locally equipped areas of play space, structural landscape planting, a wildlife pond and attenuation basins. This provision of 4.81ha is above the requirements set out in policy LHW1 and therefore complies with the policy and the Infrastructure and Developer Contributions Supplementary Planning Document.

5.8.3 Gladman will, by the time of inquiry, have progressed a S106 that includes provisions for contributions to outdoor sports facilities, parks and gardens, informal recreation and will provide the sufficient level of public open space required. In this context, it is reasonably expected that RfR7 will 'fall away'.

5.9 Reason for Refusal 8

5.9.1 The eighth reason for refusal put forward by the council is as follows:

'In the absence of a legal agreement to secure the provision of a financial contribution towards off-site health infrastructure, the proposed development fails to provide sufficient infrastructure required to serve the needs of the existing and future population. The proposal would therefore result in unnecessary additional burden being placed on existing public health facilities affecting the function and quality of these facilities, to the overall detriment of the area and users of the National Health Service. The proposal is contrary to policy COM15 of the Test Valley Borough Revised Local Plan (2016), and the Infrastructure and Developer Contributions Supplementary Planning Document.'

5.9.2 Gladman will, by the time of inquiry, have progressed a S106 that includes provisions for public health facilities and any other associated infrastructure costs. In this context, it is reasonably expected that RfR8 will 'fall away' and therefore Policy COM15 and the Infrastructure and Developer Contributions SPD will be complied with. The consultation response received from NHS Hampshire and Isle of Wight Integrated Care Board (CD3.18) requests a financial

contribution of £176,991 towards additional GP space for the mitigation strategy to the impact on health services as part of the proposed development. The Appellant accepts this contribution and it will be included as part of the S106.

- 5.9.3 As part of the Appeal process the S106 will secure appropriate investment through financial contributions to mitigate the impacts of the proposed development on existing infrastructure. Therefore, with the S106 the application would comply with policy COM15 of the Test Valley Borough Revised Local Plan (2016), and the Infrastructure and Developer Contributions Supplementary Planning Document.

5.10 Reason for Refusal 9

- 5.10.1 The ninth reason for refusal put forward by the council is as follows:

'In the absence of information on winter groundwater monitoring records for the perched water table, to determine the peak levels for infiltration basin design and the requested updates to the drainage strategy the development fails to provide sufficient detail to ensure protection from ground and surface water impacts, and therefore the LPA cannot be satisfied that the proposal would not give rise to an adverse effect on flooding on or off site. The proposal does not comply with policy E7 of the Revised Borough Local Plan.'

- 5.10.2 Gladman have undertaken winter groundwater monitoring and updated the drainage strategy based on the results (CD6.1). The Lead Local Flood Authority have accepted the principle of attenuating runoff with restricted discharge to a surface water sewer following investigating other means of discharge. There is also information demonstrating sufficient capacity in the surface water sewers for the proposed discharge rates, which has been accepted by the LLFA subject to conditions which results in compliance with policy E7. In response to the outcome of the further groundwater monitoring, the development framework plan has been updated (CD6.2) the only change is the sizing of the basins shown.

- 5.10.3 In this context, it is reasonably expected that RfR9 will 'fall away'.

5.11 Reason for Refusal 10

- 5.11.1 The tenth reason for refusal put forward by the council is as follows:

'The proposed development by means of its nature, location and scale could have likely significant effects upon the nearby Solent and Southampton Water European Designated Site which is designated for its conservation importance. In the absence of securing

mitigation, the applicant has failed to satisfy the Council that the proposal would not adversely affect the special interest of the Solent and Southampton Water European Designated Site, therefore the application is contrary to Policies COM2 and E5 of the adopted Test Valley Borough Revised Local Plan (2016) and the Conservation of Habitats and Species Regulations 2017 (as amended).

5.11.2 The Nutrient Neutrality Assessment & Mitigation Strategy (CD1.9) submitted as part of the application concludes that nutrient neutrality for the development is achievable both pre- and post- 2030 subject to the purchase of off-site nutrient credits. The Nutrient Neutral Assessment & Mitigation Strategy calculates the nitrogen budget as 169.47 kg TN/yr pre-2030 and 165.28 kg TN/yr for the completed site. It is proposed to purchase 169.47kg nitrogen credits with a suitable source of credits being identified within the River Test Catchment. A letter confirming the source and availability of the credits is provided within the Nutrient Neutral Assessment & Mitigation Strategy (CD1.19).

5.11.3 This conclusion from the Assessment & Strategy demonstrates that the development proposals comply with policies COM2 and E5 of the adopted local plan and the Conservation of Habitats and Species Regulations 2017 and therefore should not be a Reason for Refusal. This approach has also been deemed satisfactory by Natural England (CD3.11) and the Appellant would be happy to accept a Grampian-style condition restricting occupation on the appeal site prior to the submission and approval of a scheme to ensure the development is nutrient neutral in perpetuity.

5.11.4 In this context, it is reasonably expected that RfR10 will 'fall away'.

5.12 Reason for Refusal 11

5.12.1 The eleventh reason for refusal put forward by the council is as follows:

'The application site lies within close proximity to the New Forest SPA and Solent and Southampton Water SPA which are designated for their conservation importance. In the absence of a legal agreement, the application has failed to secure the required mitigation measures in accordance with the Council's adopted 'New Forest SPA Mitigation - Interim Framework' and Solent Recreation Mitigation Strategy (2017). As such, it is not possible to conclude that the development would not have an in-combination likely significant effect on the interest features of these designated sites, as a result of increased recreational pressure. The proposed development is therefore contrary to the Council's adopted 'New Forest SPA Mitigation - Interim Framework',

Solent Recreation Mitigation Strategy (2017), Policy E5 of the adopted Test Valley Borough Revised Local Plan 2016, and the Conservation of Habitats and Species Regulations 2017 (as amended).

- 5.12.2 Policy E5 covers matters of biodiversity and specifically references the need for development which could result in a significant effect, either alone or in combination, on an international or European nature conservation designation to satisfy the requirements of the Habitat Regulations. The Ecological Impact Assessment and ES (CD1.9 and CD1.23 chapter 7) confirms that minor adverse effects on the internationally protected sites were predicted at international and county level. However, following policy-led mitigation, negligible not significant residual effects were found to be caused by the impact of the Proposed Development on the local SAC, Ramsar, SPA, and Local Wildlife Sites, during both construction and operation.
- 5.12.3 As outlined in the Ecological Impact Assessment (CD1.9) submitted as part of the application, mitigation for the recreational impact on the New Forest SAC will meet in line with the New Forest Recreation Mitigation Strategy. This mitigation will be in the form of a financial contribution (per dwelling) to offset proposed impacts. The financial contribution for the proposed development has been calculated as £1540 per dwellings towards off-site SANG mitigation measures which will be secured through the Section 106. Therefore, with the financial contribution towards the mitigation, the application would comply with policy LHW1 of the Local Plan and the Infrastructure and Developer Contributions Supplementary Planning Document.
- 5.12.4 Gladman will, by the time of inquiry, have progressed a S106 that includes a provision to secure a financial contribution towards off-site public open space. In this context, it is reasonably expected that RfR6 will 'fall away'. The approach of providing a financial contribution has been agreed to by the Councils Ecologist within the consultation response (CD3.3) where the ecologist responded no objection subject to conditions.
- 5.12.5 Gladman will, by the time of inquiry, have progressed a S106 that includes provisions for mitigation towards the New Forest SPA and Solent and Southampton Water SPA in line with the 'New Forest SPA Mitigation - Interim Framework' and Solent Recreation Mitigation Strategy (2017). In this context, it is reasonably expected that RfR11 will 'fall away'.

5.13 Reason for Refusal 12

- 5.13.1 The twelfth reason for refusal put forward by the council is as follows:

'In the absence of a legal agreement to secure skills and training and the provision of apprenticeships within the local community the proposed development fails to enhance skills and training required to serve the needs of the existing and future population. The proposal would therefore result in a lack of improvement in the local labour market to the overall detriment of the area. The proposal is contrary to policy ST1 of the Test Valley Borough Revised Local Plan (2016), and the Infrastructure and Developer Contributions Supplementary Planning Document.'

5.13.2 Policy ST1 relates to skills and training and outlines the requirement for contributions towards enhancement of skills training and the provision of apprenticeships where a development has a significant impact on the labour market. As part of any future Reserved Matters Application an ESP will be provided prior to commencement that reflects the Construction Industry Training Board (CITB) Client Based Approach, in line with Policy ST1.

5.13.3 Gladman will, by the time of inquiry, have sought to agree suitable conditions which can secure that the provisions of Policy ST1 will be met through a subsequent reserved matters application and prior to the commencement of development. RfR 12 will therefore fall away.

5.14 Reason for Refusal 13

5.14.1 The thirteenth reason for refusal put forward by the council is as follows:

'In the absence of a legal agreement to secure the delivery of the land for the potential expansion of Halterworth Primary School, there is a lack of clarity in what this expansion represents and how it contributes to the delivery of additional primary school provision in the local area, the need for which would increase as a result of the proposed development. As such, the application has failed to mitigate the impact of the proposed development in respect of primary education provision and is therefore contrary to Policy COM15 of the Test Valley Borough Revised Local Plan (2016) and the Infrastructure and Developers' Contributions SPD.'

5.14.2 Discussions and a meeting has been held with Halterworth Primary School to discuss the potential expansion to the school and the need for the additional land. The dates and details for these discussions can be found within the Statement of Community Involvement (CD1.18).

5.14.3 Gladman will, by the time of inquiry, have progressed a S106 that includes how to secure the delivery of the land for the potential expansion of Halterworth Primary School. In this context, it is reasonably expected that RfR13 will 'fall away'.

5.15 Reason for Refusal 14

5.15.1 The fourteenth reason for refusal put forward by the council is as follows:

'In the absence of a legal agreement to secure public art on site, the proposed development fails to provide sufficient visual interest on this new development. The proposal would therefore result in a lack of contribution to the public realm and community identity to the overall detriment of the area. The proposal is contrary to the Infrastructure and Developer Contributions Supplementary Planning Document.'

5.15.2 In line with the Infrastructure and Developer Contributions SPD, it is agreed that a suitably worded condition will be agreed between the parties to ensure that where public art is to be provided by a developer, an Art and Design statement will be required to be submitted and approved by the Council. RfR 14 will therefore fall away.

5.16 Third Party Objections

5.16.1 In addition to the Council's reasons for refusal, a number of objections were received from third parties to the planning application. These raise issues similar to those of the Council. The Appellant will also address those material considerations raised in evidence to demonstrate those concerns are unfounded, or that they can be suitably mitigated by condition or planning obligation.

6 PLANNING CONDITIONS AND SECTION 106

OBLIGATIONS

6.1 Planning Conditions

6.1.1 The parties will seek to reach agreement on other planning conditions in advance of the Inquiry. An update will be provided accordingly.

6.2 Section 106 Obligations

6.2.1 Gladman will seek to enter into constructive dialogue with Test Valley Borough Council to agree Section 106 obligations for any obligations which, in accordance with the CIL Regulations (2010) (as amended) are necessary, directly related to the development and fairly related in scale and kind to the development.

7 THE PLANNING BALANCE AND CONCLUSIONS

7.1 The Planning Balance

7.1.1 Planning law requires that planning applications should be determined in accordance with the development plan unless material considerations indicate otherwise.

7.1.2 The Appellant acknowledges conflict with the development plan when read as a whole. In particular, it has been acknowledged that the proposal conflicts with Policy COM2, as the appeal site lies outside of the existing built-up area boundary of Romsey and is thus technically categorised as being in the open countryside. However, the practical land use planning harm that arises from this is limited as the proposal will not result in an unsustainable pattern of development. Rather, development will be focussed on a logical site adjacent to a sustainable major centre. As such, no more than limited weight should be afforded to the conflict.

7.1.3 Whilst it is acknowledged that the appeal proposal also results in a degree of harm to landscape character, this is comparable to that from the development of any greenfield site.

7.1.4 The Appellant will demonstrate that the appeal site represents a suitable and sustainable location for the quantum and nature of the development proposed. Where conflict is alleged with policies of the development plan which seek to guide the location of development, the Appellant will demonstrate that those policies serve to restrict the construction of much-needed market and affordable homes and cannot be afforded full weight nor can they be determinative in this case, irrespective of the housing land supply position.

7.1.5 Overall, it will be demonstrated that the conflict with the development plan should not weigh heavily against the proposal. In any event, there are important material considerations that justify departure from the plan.

7.1.6 The appeal proposal will secure a range of benefits that will be demonstrated in full in evidence. These include, inter alia:

- Up to 270 dwellings in a sustainable location.
- 40% affordable housing on-site to address an identified affordable housing need.
- 4.45 ha of public open space (over 47% of the gross site outline application area).
- 1.09ha of land to be gifted to Halterworth Primary School for potential future expansion.

- Construction Spend of circa £47.7 million and circa £9.2 million direct Gross Value Added per annum.
- Supporting approximately 120 FTE construction jobs per annum over a built-out period of 6 years.
- An estimated resident's gross annual expenditure of circa £9.8 million.
- Additional Council Tax of £530,820 per annum and New Homes Bonus revenue of £2.2 m.
- Securing a 10% biodiversity net gain, when compared to the pre-development status of the site.

7.1.7 It will be demonstrated that the harm arising in respect of the appeal proposal is no more than might reasonably be anticipated when changing a green field to one of built form. The Appellant will adduce evidence to demonstrate that the benefits clearly outweigh the conflict with the development plan, and other harm, irrespective of whether the tilted balance is engaged.

7.2 Conclusion

7.2.1 It will be demonstrated that there are no adverse impacts arising from the appeal proposal, which would outweigh the benefits the development will deliver. There are no specific policies of the Framework which would either preclude or restrict the development in the current circumstances.

7.2.2 Ultimately, it will be demonstrated that the planning balance tips in favour of the proposed development, irrespective of whether the tilted balance applies, and that outline planning permission should be granted.

APPENDIX 1 – PFSH SPATIAL POSITION STATEMENT DEC 2023



Partnership for South Hampshire Spatial Position Statement

December 2023

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Appendix 1: Key Evidence Base Documents

Foreword

This Spatial Position Statement has been produced collaboratively by the constituent authorities that make up the Partnership for South Hampshire (PfSH). The Spatial Position Statement aims to provide guiding principles for local plans to help deliver sustainable development within South Hampshire.

The Spatial Position Statement is not an upper tier plan with which future local plans will need to conform. It does not have the status of a development plan document. It does however help inform the preparation of and strategic co-ordination of local plans (currently the 'duty to cooperate' requirement – due to be replaced with an 'alignment policy' although no detail is currently available on content or timing).

1. Background

- 1.1. In 2016 the Partnership for South Hampshire (PfSH) authorities produced a framework, namely the PUSH Spatial Position Statement, to guide future local plans and housebuilding and development in the sub-region. Since then, much has changed with, and perhaps most significantly, boosting the supply of housing becoming an even higher priority of the Government's agenda, and subsequent revisions to national planning policy. The National Planning Policy Framework (NPPF) has been significantly revised, with one of the main changes being the introduction of a standard method for the assessment of housing needs for local authorities according to the formula issued by Government.
- 1.2. In line with the aim of addressing the national housing crisis, the Government has, to date, made clear that cooperation through the Duty to Cooperate¹ should look to inform strategic policies within development plans, which should consider and, wherever possible, provide for unmet needs in neighbouring authority areas. PfSH agreed, and remains committed to, the need for its constituent authorities to work together to deliver cross-boundary coordination.
- 1.3. As a result, PfSH committed to produce a Statement of Common Ground (SoCG) and to explore a number of evidence workstreams to inform the production of a PfSH Spatial Position Statement (originally called a Joint Strategy). In October 2019 PfSH agreed a draft framework SoCG. This document was subsequently revised and updated to form an initial SoCG in September 2020. It has since been further revised and updated in 2021, 2022 and 2023. The SoCG sets out the methodology and the framework for this Spatial Position Statement, which has been agreed by PfSH partner authorities.

¹ The Levelling Up and Regeneration Act will abolish the Duty to Cooperate when regulations permit. It will be replaced with an 'alignment policy' although details on content and timing of the replacement policy are not currently available.

2. Scope/status

- 2.1. The Spatial Position Statement sets out the agreed course of action with regard to the provision of sufficient housing and employment across the sub-region, within the principles of good place making. It sets out the approach by which the PfSH authorities will collectively deliver on the housing and employment requirements set out in national planning policy.
- 2.2. The Spatial Position Statement is not intended to be a statutory strategic plan for South Hampshire. Whilst it will help guide local plans in terms of cross-boundary issues, it is not intended to be prescriptive or to contain requirements that local plans have to meet. Local plans will need to undertake the processes associated with statutory plan-making including consultation, consideration of options, strategic environmental assessment, habitat regulations assessment and formal examination. The Spatial Position Statement does not have the status of a 'development plan document'.
- 2.3. The Spatial Position Statement covers the provision of housing and employment across the sub-region up to 2036. However, given the lead in times for larger sites, it is likely that the key strategic sites that deliver throughout the sub-region will continue to deliver new development well beyond 2036. The Spatial Position Statement therefore provides an overall vision and strategic direction for new development that can be considered up to 2050.
- 2.4. The Statement also sets out the framework by which PfSH will secure some of its environmental and climate-related aspirations including green infrastructure, biodiversity net gain, environmental enhancement and avoidance and mitigation of environmental impacts.
- 2.5. There are legal requirements for carrying out strategic environmental assessment (incorporated within sustainability appraisal) and habitat regulations assessments (including appropriate assessments) when considering the location of new development. Under the Conservation of Habitats and Species Regulations 2017 (63), where significant environmental impacts from development on designated sites cannot be avoided or ruled out, that development can only proceed if effective mitigation to fully offset those impacts is provided before or when the development impact arises. As this is to ensure that the development does not worsen the environmental condition and integrity of the designated site, the mitigation provided must also be effective 'in perpetuity'². As this Spatial Position Statement is a non-statutory document, these assessments will be carried out as future local plans are progressed taking into account legislative changes in the Levelling Up and Regeneration Act when these are implemented.

² 'In perpetuity' means for the lifespan of the development causing the adverse effect. For housing this is typically 80-130 years.

- 2.6. The Spatial Position Statement has been prepared in conjunction with Natural England, the Environment Agency and the South Hampshire Local Transport Authorities and has been considered by the PfSH Joint Committee of constituent authorities.
- 2.7. This Spatial Position Statement represents the situation at a point-in-time and will be updated in future years to reflect progress in local plans and other development plan documents.

3. Changing national policy background

Planning policy

- 3.1. The strategy has been produced against the backdrop of a changing national policy background. In December 2022, the Government consulted on the ‘Levelling Up and Regeneration Bill – reforms to national planning policy’. The bill has now been confirmed as the Levelling Up and Regeneration Act, although implementation will be largely dependent on the publication of secondary legislation and timescales are still uncertain and the final reforms to national planning policy in the NPPF are still awaited. Some proposals could have a significant impact on the work of PfSH, not least replacing the Duty to Co-operate with an ‘*alignment policy*³’ seeking to ‘*secure appropriate engagement between authorities where strategic planning considerations cut across boundaries*’. However, whilst there is still uncertainty about how the Government intends to deal with strategic planning, PfSH considers that this Spatial Position Statement demonstrates appropriate engagement between the PfSH authorities to consider strategic planning issues that cut across boundaries. Recent Government pronouncements on the focus for regeneration support the ‘cities and towns first’ principle which has been consistently applied by PfSH.
- 3.2. Two other important proposals in this consultation relate to the calculation of housing need and the treatment of unmet need derived from authorities where the urban uplift of 35% is applied to the level of need⁴, as part of the standard method. On the issue of calculating housing need, the consultation contained a proposal to allow an alternative method for calculating need, other than the standard method ‘*where there are exceptional circumstances that can be justified*’. There was a commitment that the revised NPPF, originally due for publication in Spring 2023, would contain ‘*more explicit indications in planning guidance of the types of local characteristics which may justify the use of an alternative method*’. In its response to the consultation, PfSH put forward a case for several local characteristics to be included in this justification for an alternative method and awaits the publication of the revised NPPF and/or planning guidance.
- 3.3. Separately, the Government suggested that there may be a review of the standard method itself in 2024 upon release of 2021 Census based household projections by the Office for National Statistics. An unintended consequence of this announcement is that several Local Planning Authorities (LPAs) are re-considering their timetables for local plan production, and whilst that does not appear to be the case for the PfSH authorities, it does signal a significant level of uncertainty nationally about the level of housing need to be planned for.

³ Wording taken from the consultation document, available at <https://www.gov.uk/government/consultations/levelling-up-and-regeneration-bill-reforms-to-national-planning-policy/levelling-up-and-regeneration-bill-reforms-to-national-planning-policy>

⁴ This only applies to Southampton in South Hampshire

- 3.4. The final proposal which has the potential to impact the collective work of the PfSH authorities relates to the treatment of unmet need from the larger towns and cities. Southampton City Council, as the planning authority for one of the 20 largest urban areas in England, needs to include a 35% 'urban uplift' to its need calculations as part of the standard method. This has the potential to increase the level of unmet need in that area which, under the current Duty to Co-operate and NPPF, should be accommodated in neighbouring areas '*where it is practical to do so and is consistent with achieving sustainable development*' (paragraph 35a of the NPPF 2023). However, the 2022 Government consultation signalled a change in this policy suggesting that this uplift '*so far as possible, (is) met by the town and cities concerned rather than exported to surrounding areas.*'
- 3.5. Recognising that the consultation document does go on to refer to situations where surrounding areas may accept unmet need derived from this urban uplift through voluntary, cross-boundary agreements, this is a change in policy from the Government which could be brought in via a revised NPPF. There is, however, no confirmed date when a revised NPPF will be published.
- 3.6. It is against this uncertain backdrop therefore, that this Statement has taken an approach which is flexible and can be adjusted in future years should these proposals in this latest Government consultation come into practice, and the policy framework within which PfSH operates changes significantly. In overall terms, whilst the precise targets may change, there is still a strong need for new homes. It is important to retain flexibility on the specific targets whilst continuing to plan positively for the overall needs.

Environmental policy

- 3.7. A key priority for the PfSH authorities is to ensure that the natural environment is protected and enhanced alongside providing for the new development needed. South Hampshire has a rich and diverse natural environment, including a range of internationally designated sites, and is located adjacent to the South Downs and New Forest National Parks.
- 3.8. The Government's Environmental Improvement Plan (EIP23) apex goal is to halt the national decline in biodiversity. EIP23 seeks to protect 30% of the land and sea for nature by 2030 through a national Nature Recovery Network (NRN), including by restoring, connecting or creating wildlife-rich habitats outside currently protected sites.
- 3.9. The Government's 'A Green Future: Our 25 Year Plan to Improve the Environment' (2018) set the ambitious target of 75% of the UK's waters being as close to their natural state as possible. This is a significant challenge, especially in the context of climate change effects on weather patterns. In 2019 only 16% of England's waters achieved good ecological status, the standard set by the Water Environment (Water Framework Directive) Regulations 2017.

- 3.10. The NPPF (2023: paras 174 - 182) states that local plan policies (and planning decisions) should contribute to and enhance the natural and local environment. Development resulting in the loss or deterioration of irreplaceable habitats or significant harm to biodiversity should be avoided other than in exceptional circumstances. Local plans should take a strategic approach at a catchment or landscape scale to maintaining and enhancing networks of habitats and green and blue infrastructure, and to enhancing natural capital, recognising the intrinsic character and beauty of the countryside and the wider benefits derived from natural capital and ecosystem services. Habitats, corridors or sites of value for biodiversity, valued landscapes and sites of value for their geology or soils should be identified and protected and where appropriate, enhanced, in a manner proportionate to their importance and quality. Land with the least environmental or amenity value should be preferred for development, and development should, wherever possible, help to improve local environmental conditions.
- 3.11. Case law on the interpretation of the Habitat Regulations has had a significant impact on delaying the delivery of housing development in South Hampshire. The ruling made by the Court of Justice of the European Union (CJEU) on the interpretation of the Habitats Directive in the 'Dutch Nitrogen Case' requires that development be demonstrated to be nutrient neutral in terms of wastewater treatment and disposal. PfSH has been successful in adopting strategic approaches to mitigation and ensuring that development can proceed through the formation of a Water Quality Working Group and a dedicated strategic environmental planning team.
- 3.12. The Environment Act 2021 put the ambitions of the 25 Year Environment Plan on a statutory footing, setting legally binding targets for nature recovery. The Act introduced new duties for LPAs to conserve and enhance biodiversity, a requirement for new development⁵ to deliver at least 10% biodiversity net gain (BNG) and mandated the preparation of Local Nature Recovery Strategies (LNRS). BNG is a mechanism to ensure that the use or development of land contributes to nature recovery, by ensuring that habitat for wildlife is left in a measurably better state than it was beforehand, calculated using a national [Biodiversity Metric](#). Where it is not possible to achieve BNG on-site in whole or part, offsite BNG credits can be provided or purchased to make up the full BNG requirement. Hampshire County Council has been appointed as the responsible authority to lead the production of the LNRS for the whole of Hampshire (including the cities) as part of a Hampshire LNRS.
- 3.13. The Levelling Up and Regeneration Act has introduced a requirement for water companies in 'nutrient neutrality' areas (including South Hampshire) to upgrade wastewater treatment works to the highest technically achievable limits by 2030. Alongside this, Natural England has established a Nutrient Mitigation Scheme (similar to the scheme introduced by the PfSH authorities) to help ensure that wildlife is not further harmed as a result of the increase in nutrients generated by new development entering the environment. These measures can

help to ensure that development is not further delayed as a response to the nutrients issue.

Transport policy

3.14. As well as the NPPF being changed, the transport policy landscape has changed significantly since the 2016 PUSH Spatial Position Statement. Of note is:

- The Department for Transport (DfT) has produced a Transport Decarbonisation Plan 2020 which sets out the Government's ambition to decarbonise the transport system by 2050. Transport funding settlements will help drive decarbonisation in local transport plans and local plans but it will also require LPAs and LTAs to work closely to ensure land use and transport planning are better integrated.⁶
- The DfT has indicated that it will be issuing Local Transport Guidance which requires plans to have developed decarbonisation pathways that evidence their activity is decarbonising the transport system with quantifiable carbon reductions.

3.15. Reflecting national transport policy changes and the introduction of Clean Air Zones (CAZs) in Portsmouth and Southampton (CAZ equivalent), Local Transport Plans that prioritise sustainable and active travel to support people and places to reduce car dependency and vehicular emissions have been adopted or are being brought forward by Hampshire County Council, Portsmouth City Council and Southampton City Council. Solent Transport is currently preparing a Solent Transport Strategy. Transport for the South East (TfSE) has produced a new regional transport strategy which sets a framework for moving away from a 'predict and provide' system of transport planning to a 'decide and provide' or 'vision and validate' approach. This is a move away from simply applying the historic Transport Assessment methodologies that local planning and transport authorities have become used to and towards a more place and people focused approach to assessment. In Summer 2022 TfSE consulted on the draft Strategic Investment Plan (SIP). After public consultation, the SIP was updated and the revised version sent to Government in March 2023. The SIP builds on the regional transport strategy and other studies.

⁵ Applicable for major developments from January 2024 and extending to smaller developments from April 2024.

⁶ The DfT has issued:

- the 'Bus Back Better' strategy to deliver better bus services nationally, including integrating bus services within new development to reduce car dependency;
- the 'Gear Change' strategy setting out a desire to dramatically improve active travel infrastructure, including setting up a new executive agency to ensure national standards are met and Active Travel England should be consulted on development over a certain threshold;
- the 'Inclusive Transport Strategy' that looks to ensure that everybody can get around regardless of disability or other restriction;
- 'Consultation to Update the Strategic Road Network and the Delivery of Sustainable Development (Circular 02/2013) – if accepted LPAs will be required to show compliance with decarbonisation trajectories in their local plans.

Collaboration on cross-border issues

- 3.16. PfSH has a formal agreement for its work through the Partnership for South Hampshire Agreement (2021). It provides the planning and environmental policy input as part of a triumvirate of sub-regional leadership organisations alongside the Solent Local Economic Partnership and Solent Transport. Whilst a main aim is to work together to form an evidence base to support local plan work, it also seeks to lead, manage and deliver the vision and spatial planning for the sub-region.
- 3.17. PfSH has a strong history of providing an appropriate vehicle for collaboration on cross-border issues. It prepared the sub-regional strategy that was included in the South East Plan, an update in 2012 and a Spatial Position Statement in 2016. PfSH has continued to commission and produce the evidence base, under a Statement of Common Ground, that has led to this Spatial Position Statement. PfSH has agreed bilateral Statements of Common Ground with Local Planning Authorities (LPAs) progressing local plans to examination.
- 3.18. The key evidence base documents that have informed this Spatial Position Statement are:
- [Economic, Employment and Commercial Needs \(including logistics\) Study](#)
 - Identification of Broad Areas of Search for Growth assessments
 - [Green Belt/Green Infrastructure Designations Study: Policy Options Review](#)
 - [Strategic Green and Blue Infrastructure Opportunities in South Hampshire.](#)
- 3.19. PfSH also continues to collaborate when it can achieve efficiencies and a scale of operation that delivers collective benefits that might not be feasible for individual authorities. Examples include the Solent Recreation Mitigation Strategy and strategic planning support to facilitate the creation of a network of mitigation sites and schemes around Hampshire to address nutrient neutrality issues. Both examples demonstrate collaborative working to deliver solutions to allow housing development to continue whilst protecting the environment from potential harm.
- 3.20. Work undertaken by PfSH local authorities, and the PfSH Strategic Environmental Planning Team, is at the forefront of national best practice on nutrient mitigation and has delivered or facilitated a number of LPA and market-led catchment-based solutions. A Water Quality Working Group (WQWG) was established in 2018. Whilst initially focused on water treatment infrastructure capacity, in the period 2019-2021 the group refocused on the issue of nutrient neutrality. In 2020, the PfSH authorities appointed a Strategic Environmental Planning (SEP) officer to support work on nutrient neutrality and expanded that capacity in 2022 to cover a wider environmental remit. In 2023 the WQWG and SEP steering group were merged.

- 3.21. The PfSH [Air Quality Impact Assessment](#) (2018) and the [New Forest Air Quality Study](#) (2018) and accompanying [ecological advice report](#) provide a starting point for the strategic consideration of air quality impacts for local plan preparation, although when preparing local plans PfSH authorities will need to consider the latest evidence over a longer timescale. The PfSH study forecast air quality improvements to meet most air quality objectives in most current Air Quality Management Areas (AQMAs) by 2034, mainly due to background air quality improvements. However, likely significant effects from air quality impacts on designated habitat sites could not be ruled out based on the then existing evidence base. In most cases, the predicted areas of possible air quality impacts on designated sites were in close proximity to existing motorways and A-roads, and further survey work may be needed in these locations to inform local plan Habitat Regulations Assessments.
- 3.22. The New Forest study similarly did not identify, but could not rule out, harm to designated sites in the New Forest from the traffic emissions from continued traffic growth. Potential harmful effects predominantly arise from through traffic and affect areas near the main New Forest road corridors between Hampshire, Wiltshire and Dorset. These corridors are subject to ongoing ecological monitoring, through a joint New Forest District/National Park Authority study which commenced in 2021 with a baseline study and repeat surveys already scheduled and commissioned for 2024 and 2027. Further cross boundary work may be needed on air quality monitoring and (where required) mitigation for any adverse impacts that may be identified. This work has not identified any actionable harm to date, but monitoring will continue and will inform local plan Habitat Regulations Assessments.
- 3.23. An updated level one Strategic Flood Risk Assessment (SFRA) is being prepared for the PfSH area, to address the significant changes to climate change projections, legislation and national planning policy for flood risk management since the previous SPS 2016 was published. The new PfSH SFRA will provide a baseline to inform local plan preparation in the PfSH area. In preparing local plans PfSH authorities will need to minimise flood risk by applying the sequential approach for flood risk management, and where necessary the flooding exception test.
- 3.24. In some areas there is a potential need to identify and bring forward grey and green flood management infrastructure to help ensure that current communities and planned development will be protected from increasing flood risks. In addition, broad locations with potential for floodplain reconnection or for catchment management woodland are identified in fig 3.15 of the PfSH report [Strategic Green and Blue Infrastructure Opportunities in South Hampshire \(LUC 2023\)](#), and figure 3.16 identifies priority areas for natural flood management.

4. Geography of PfSH/understanding the sub-region

4.1. PfSH covers the following local authority areas:

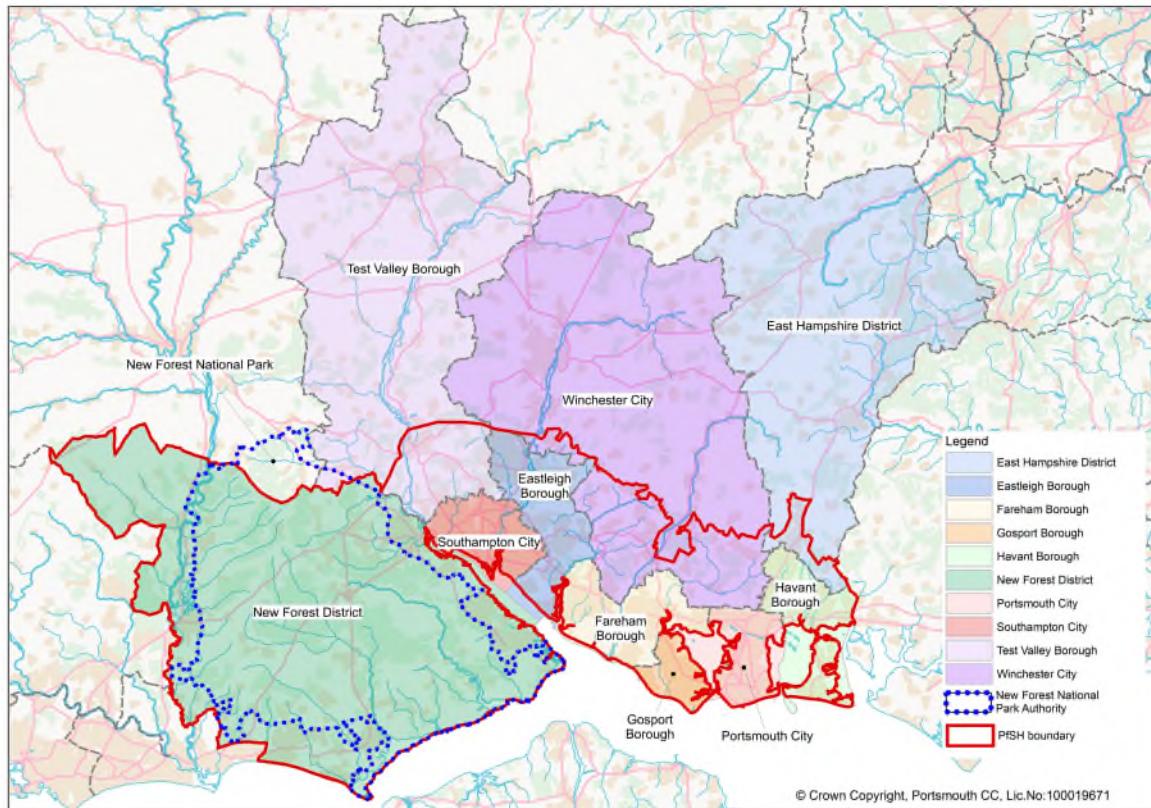


Figure 1: PfSH sub-region

4.2. T

here are seven LPAs wholly within the PfSH boundary: Eastleigh Borough Council, Fareham Borough Council, Gosport Borough Council, Havant Borough Council, New Forest District Council, Portsmouth City Council, and Southampton City Council. There are also five authorities that are partly within the PfSH boundary: East Hampshire District Council, Hampshire County Council, New Forest National Park Authority⁷, Test Valley Borough Council⁸, and Winchester City Council.

4.3. Of significant importance to any spatial collaboration by PfSH is the nature of the geography. The area is already significantly built up in a wide range of locations. In addition, as well as being significantly constrained by the coast to the south, the area includes or is bordered by national parks (New Forest and South Downs) and the Chichester Harbour Area of Outstanding Natural Beauty and is home to a number of designated sites. The coastal geography of islands,

⁷ The New Forest National Park Authority is not a local authority but is a local planning authority with full planning responsibilities. A small part of the New Forest National Park is in Wiltshire.

⁸ Please note that whilst only part of Test Valley Borough Council area falls within the PfSH boundary, the evidence base studies referenced in this report will cover the whole Borough, unless the Council determines otherwise.

peninsulas and estuaries, whilst providing an attractive and economically beneficial waterfront, presents significant challenges to implementing efficient and effective transport infrastructure within the sub-region due to the need to cross water bodies and the severance they cause between different urban areas.

4.4. The natural and man-made environment of the Solent makes it one of the most important coastal zones in the UK. The diversity of coastal habitats and bird species comprise an internationally important wildlife resource. The rich estuarine and intertidal mudflats, saltmarsh, shingle beaches and adjacent coastal habitats support internationally important numbers of migratory and over-wintering waders and waterfowl. Key habitat areas have been designated to protect the species they contain or that rely on them. Most of the rivers within the PfSH area drain into the Solent, and the Rivers Itchen and Avon are designated habitat sites in their own right. Statutory designated international sites make up more than half of the New Forest National Park area, protecting a range of rare habitats and species, including areas important to ground-nesting birds. Designated sites are complemented by an extensive network of non-statutory Sites of Importance for Nature Conservation (SINCs) which also contribute to the ecological network.

4.5. The environmental qualities, features and designated sites of the PfSH area are indivisible from and set within both its natural landscapes and townscapes and those of its wider context. These include the New Forest National Park, parts of the South Downs National Park, parts of the Cranborne Chase and Chichester Harbour Areas of Outstanding Natural Beauty, and the Solent coastline of about 190 km. Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks and Areas of Outstanding Natural Beauty (AONB). Development within them should be limited, while development within their setting should be sensitively located and designed to avoid and minimise adverse impacts. Major development within National Parks and AONBs is deemed inappropriate other than in exceptional circumstances (NPPF 2023: paras 176 - 177). Under the Section 11A of the National Parks and Access to the Countryside Act 1949, relevant authorities must seek to further the two statutory purposes of National Parks (set out below) in exercising or performing any functions that could affect them.

- Conserving and enhancing their natural beauty, wildlife and cultural heritage.
- Promoting opportunities for the understanding and enjoyment of their special qualities by the public.

4.6. PfSH has undertaken an examination of the types and extent of constraints it faces⁹. NPPF (2023: para 11 footnote 7) constraints provide a strong reason for restricting the overall scale, type or distribution of development in the plan area. These consist of SACs and SPAs (as protected by the Habitats Regulations),

⁹ For further information please see the Broad Areas of Search for Growth Assessments

Ramsar sites, functionally linked land for the Solent Waders and Brent Goose network, SSSIs, Green Belt, AONBs, National Parks, irreplaceable habitats (coastal saltmarsh, ancient woodland, lowland fens, coastal sand dunes), designated heritage assets and areas at risk of flooding or coastal change.

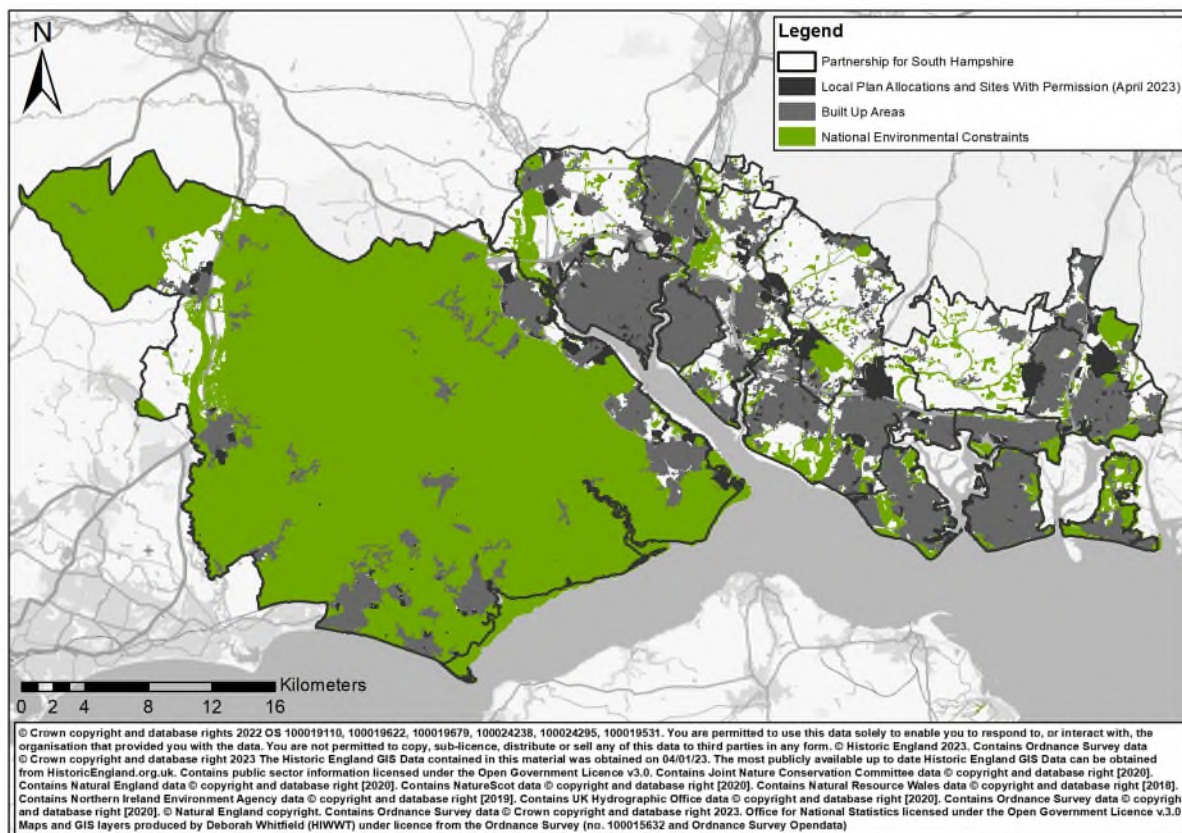


Figure 2: National constraints across the PfSH sub-region

4.7. Whi

It is ensuring that we plan for the new development we need, the PfSH authorities have also recognised that it is important for the successful delivery of development that we do this whilst protecting and enhancing a coherent pattern of town and countryside. This is particularly important given the number and range of settlements (cities, towns and villages) in close proximity to each other. It will mean important countryside is protected by ensuring that the settings of settlements with distinct identities are protected by appropriate settlement gaps, and that the areas with the most productive agricultural land, highest landscape value and greatest recreational or ecological benefit are protected and enhanced.

4.8. It is with this in mind that PfSH authorities agreed to consider a number of additional constraints of sub-regional importance, in addition to the NPPF paragraph 11 footnote 7 constraints. These consist of settlement/strategic gaps, country parks and the best and most versatile agricultural land classification grades 1 & 2. Figure 3 shows that when all of these constraints are applied to the PfSH area, there is little unconstrained land remaining. It is important to note that much of this land is amongst the least accessible, being furthest from key destinations and public transport routes.

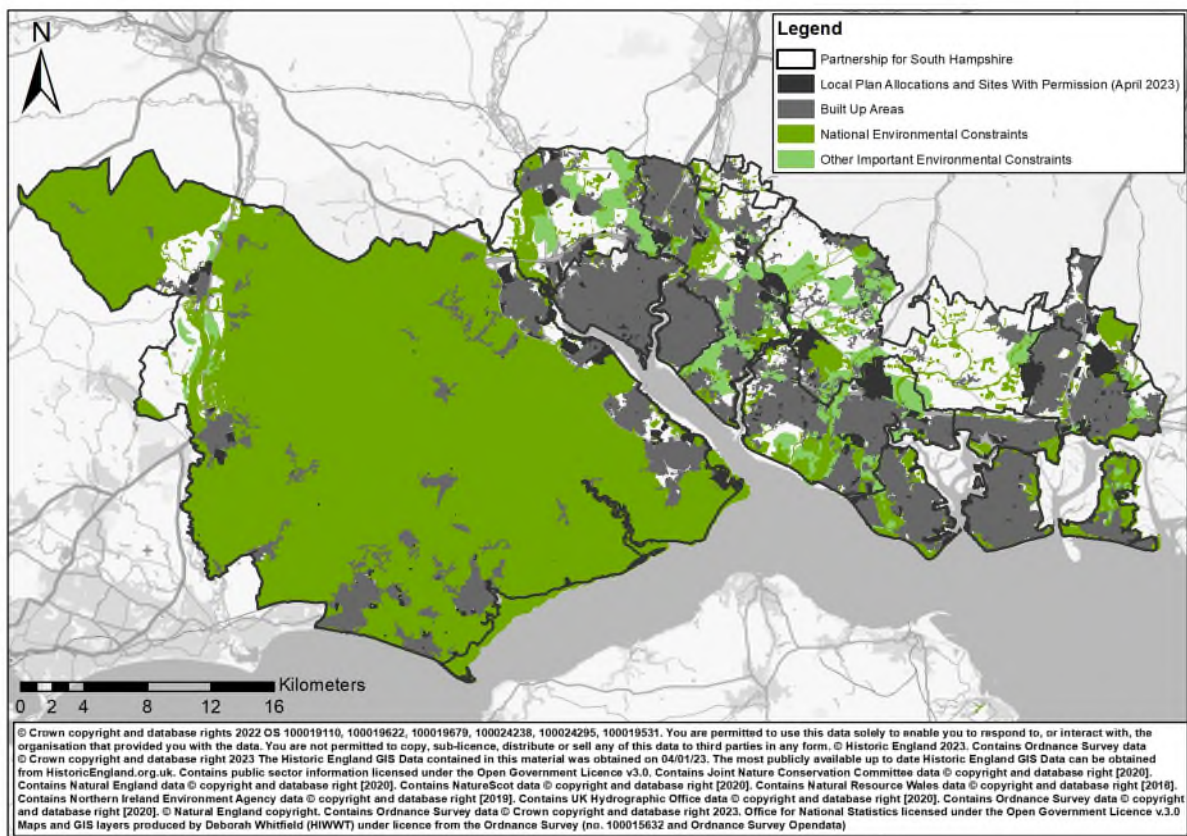


Figure 3: Total constrained land across the PfSH sub-region

5. Strategic principles

5.1. PfSH continues to support the 'cities/existing urban areas first' principle and as much development as possible should be directed to the urban centres in South Hampshire. However, the cities and existing urban areas have a finite capacity and many of the best sites have already been developed or allocated in existing plans. Increasing housing need means that more sites are required and these cannot be provided solely within the existing urban areas. The PfSH LPAs will have to consider greenfield locations that support modal shift and it is more sustainable to focus on strategic scale sites (areas of search for growth) as these bring the benefit of infrastructure delivery.

SPS1: STRATEGIC PRINCIPLES FOR SUSTAINABLE GROWTH

The PfSH authorities will work together to produce local plans according to the following strategic principles for sustainable growth:

1. Addressing the linked climate and biodiversity emergencies are pivotal strategic principles for South Hampshire.
2. Achieving the transition to net zero carbon will require a fundamental modal shift in transport to zero and low carbon travel, including active travel and public transport. Site selection and capacities will need to be optimised to promote modal shift and avoid car dependency where possible.
3. Where possible, housing need will be met. This will be through a combination of strategic and smaller sites allocated in local plans, where appropriate.
4. Housing growth needs to be balanced with economic growth.
5. Growth will be focussed in existing urban areas with 'cities and towns first' and/or in locations that support modal shift in transport.
6. Environmental assets (many of which are linked to national policy and legislation) must be recognised and addressed and the need for nature recovery and to protect and enhance key habitats will be prioritised.
7. Local plans should consider the need for strategic or settlement gaps where they would be important to maintain the character of distinct/separate settlements or visual gaps between settlements.
8. The protection of best and most versatile agricultural land should be considered when determining sites for allocation in local plans, recognising its value for food production.
9. The PfSH authorities will work together to deliver new and enhanced multifunctional green and blue infrastructure.
10. The PfSH authorities will continue to share evidence on infrastructure investment which is needed within the South Hampshire sub-region.

- 5.2. South Hampshire continues to face pressing new challenges over the potential impact of development on the environment. The Climate Emergency is an existential global crisis affecting new development and impacting on existing settlements and a number of local authorities have declared climate emergencies. There is a need to ensure that development is planned in a way that minimises carbon emissions that cause climate change and that new development, so far as is possible, is not vulnerable to the impacts of climate change. This is an overarching theme of great significance for the Spatial Position Statement. PfSH will ensure through this Spatial Position Statement that the framework enables the creation of strong and resilient communities able to withstand the effects of climate change.
- 5.3. The PfSH authorities are also in agreement that the economic recovery should be focused on a 'green' recovery. This should ensure that planning for economic growth does not simply assume that it will carry on as before. There is an opportunity to tackle deeply ingrained economic, environmental, and social challenges, from climate change and inequality to the sub-region's physical and mental health.
- 5.4. PfSH is supporting the development of a 'Greenprint for South Hampshire' that will provide a shared framework to enable authorities to work together to deliver programmes that achieve economic, environmental, and social improvements. The framework for the 'Greenprint for South Hampshire' is based on five priorities which reflect shared commitments of local authorities and other partners across South Hampshire. The priorities are:
- Net zero with nature
 - Natural health service
 - World class blue/green environments
 - Creating great places through quality in design and build
 - Centre for excellence in green skills and jobs.
- 5.5. The PfSH authorities have long agreed that well-planned settlements and a collaborative solution to sub-regional housing need is clearly better and more desirable than the alternative of challenges to local plans and unplanned growth. It has been a long standing and continued objective of PfSH to focus development within the major urban areas, cities, and towns first and to ensure that housing growth needs are balanced with economic growth. The cities and towns form the economic and social heart of South Hampshire. Focussing major development in these locations will enhance economic synergies, the vibrancy of places, support regeneration, social inclusion and the effective use of existing infrastructure, focus people close to jobs, services and public transport (reducing our need to travel by car), and protect more of our countryside.
- 5.6. It has also been long agreed that it is important to recognise that the need for homes and jobs will require new development and infrastructure in a range of locations both within and around our towns and villages, and a balanced

investment strategy is needed to deliver development in our cities, towns, villages and new areas of growth. Therefore, housing need will be addressed through a combination of strategic and smaller sites in future local plan allocations with the infrastructure required identified in Infrastructure Delivery Plans. This approach also recognises that a high degree of growth is already committed across the region, a key part of this Statement. The PfSH authorities agree that future site selection should take account of these principles and be optimised to promote modal shift and avoid car dependency where possible.

- 5.7. Infrastructure investment remains a strategic priority for PfSH, with this Spatial Position Statement recognising the requirement to balance growth with the infrastructure required to support it. This includes a wide range of infrastructure, including for transport, flood management, education, health and community facilities. Of particular importance in the Solent area is the recognition of significant environmental constraints, many of which are linked to national policy and legislation (nitrates, phosphates, Brent Geese and Waders, Solent and New Forest recreational disturbance).
- 5.8. It should be noted that much of the growth to meet future needs is already committed through planning permissions and allocations in adopted local plans. Infrastructure to meet this growth is already being planned for, through Infrastructure Delivery Plans (supporting local plans), planning obligations (supporting individual planning permissions), LPA Community Infrastructure Levy receipts (where CIL is in place) and infrastructure providers' investment plans, although in some cases there remain significant funding gaps. The need for additional development will be identified and addressed through the production of future local plans by the PfSH LPAs and the infrastructure to support the proposed development will be assessed in revised and updated Infrastructure Delivery Plans.
- 5.9. A range of local plans are likely to contain a combination of small and larger, strategic sites, depending on the needs and opportunities within each authority. Whilst decisions on which sites to allocate and the form that development takes will rest with individual LPAs, the PfSH authorities recognise that optimising site selection and site capacities can provide opportunities to promote modal shift and avoid car dependent development.
- 5.10. The sections below set out further the approach to each individual theme. The aim is to achieve the optimal and complementary approach. In some cases a careful and considered balance will need to be struck between different aims. Section 4 describes the geography of the area, which incorporates a wide range of characteristics important to the quality of life of South Hampshire, reflected in a range of international, national and other important designations. There is a need for new homes, jobs and infrastructure as outlined in more detail below. There is also a need to ensure the provision of new development protects and enhances the characteristics and designations which make up the quality of life of the area. New development also needs to make space for environmental mitigation and enhancement and be located where it is or can be made more accessible to

contribute to reducing transport related carbon emissions and reducing the need to travel by car. The need for more development (which is focussed primarily on a need for new homes yet to be planned for) will be carefully tested through local plans against all of these important issues to achieve the optimum approach.

6. Development strategy

Climate Emergency

- 6.1. Climate change is an overarching theme that is at the forefront of the strategy for new development. Most PfSH authorities have declared a climate emergency. There are opportunities to reduce potential environmental impacts through the location and form of new development, in particular to ensure that active travel, shared transport and public transport are integral to site specific design. These need to be considered alongside adaptation measures that can reduce the impacts of climate change. Planning policies relating to managing flood risk and incorporating appropriate planting and landscaping are significant.
- 6.2. Renewable energy generation will be fundamental to achieving net-zero carbon and the PfSH authorities should include policies in local plans to promote standalone schemes as well as integrating smaller scale generation with the design of individual development sites.
- 6.3. The Local Transport Authorities have set out their proposals in Local Transport Plan(s) 4 to move to a low-carbon transport system through a reduction in traffic levels which is achieved through a mass shift to active and sustainable transport.
- 6.4. At the sub-regional level PfSH has a long-standing objective to focus new growth in the cities and towns first. This has multiple benefits, including focussing growth close to homes and jobs/services, sustainable transport and other infrastructure supporting urban regeneration and reducing development pressure on the countryside. Where greenfield development does need to be delivered to help meet identified needs this PfSH Spatial Position Statement aims to locate development in the areas that are closest to the major centres of population and most easily able to be integrated with existing transport networks.
- 6.5. Dealing with climate change issues can have a long-term beneficial impact on the health and wellbeing of the new communities now being planned. Other issues, such as access to green spaces and opportunities for active travel will need to be addressed through strategies for new development in local plans.

SPS2: STRATEGIC PRINCIPLES FOR THE CLIMATE EMERGENCY

The PfSH authorities will work together and in partnership with others to promote the location and form of development that will:

- 1. Maximise energy efficiency and minimise energy use.**
- 2. Minimise carbon emissions.**
- 3. Reduce the need to travel through masterplanning strategic sites to ensure that amenities are available within cycling/walking distance.**
- 4. Support renewable energy generation.**

5. Incorporate measures to enable adaption to the impacts of climate change, including managing water supply and flood risk.

The PfSH authorities will support the implementation of plans and strategies to accommodate the most sustainable forms of development at the sub-regional level and within individual local plans, having particular regard to the transport implications of new development.

Delivering sustainable growth

6.6. The future development and growth of South Hampshire must be undertaken through a considered and evidenced approach. Recent updates to the NPPF have made it increasingly clear that creating high quality, beautiful and sustainable buildings, spaces and places is fundamental to what the planning and development process should achieve.

6.7. Paragraph 73 of the NPPF (2023) supports the supply of large numbers of new homes *‘through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities. Working with the support of their communities, and with other authorities if appropriate, strategic policy-making authorities should identify suitable locations for such development where this can help to meet identified needs in a sustainable way.’*

6.8. Given the scale of development, which is set out in this Spatial Position Statement, significant infrastructure investments will need to be delivered to make new communities sustainable and to mitigate negative effects on existing communities. To achieve this, strategic scale new developments will need to be planned comprehensively, together with the required infrastructure.

SPS3: STRATEGIC PRINCIPLES FOR INFRASTRUCTURE PROVISION

The need for new and improved infrastructure should be assessed as an integral part of the local plan development process. The PfSH authorities will work proactively with the appropriate infrastructure providers to ensure that new infrastructure is programmed to support the delivery of planned new development.

The PfSH authorities will work collaboratively to identify and help secure funding for the strategic infrastructure required to deliver sustainable growth and development across multiple local authority areas. This includes the growth identified in SPS7 (Existing Strategic Development Locations) and new strategic growth identified in emerging local plans (either as identified in SPS8 (New Broad Areas of Search for Growth) or other strategic locations).

- 6.9. To support the initial allocation and more detailed development management processes, a concept and then more detailed masterplan would normally be needed for strategic sites, to include the whole site (irrespective of landownership status) and prepared in conjunction with and be approved by the relevant LPA (potentially as part of a Planning Performance Agreement). This would often be prepared by site promoters, employing extensive public engagement. Government is clear that they are seeking to increase the amount of engagement that takes place, focussing on the role of digital engagement to improve the quality, quantity and diversity of participation in the planning process. Linked but separately, the PfSH authorities may decide to require area-wide or site-specific design codes to be prepared. Masterplans would normally be expected to be accompanied by a phasing plan which assists in assessing development delivery and identifies trigger points for infrastructure delivery. The aim is to ensure that a high-quality neighbourhood with an overarching design ethos and sense of place is delivered, which has the infrastructure needed. This should be in place to support the development, as phases come forward, not just once development is complete.
- 6.10. There are clear benefits in planning for a mix of uses when planning for new communities. There will be opportunities within the existing urban areas for significant employment redevelopment, but the identification of areas suitable for larger scale growth will need employment opportunities/development and other services and facilities, proportionate to the scale of development proposed, to help ensure a level of self-containment and meet the strategic sustainable transport objectives.
- 6.11. In bringing forward strategic scale developments, the PfSH authorities will undertake continuous dialogue with landowners, infrastructure providers and other key partners. This will include exploration of support and funding from the Government and from delivery agencies such as Homes England either through PfSH or at a local level.

SPS4: STRATEGIC PRINCIPLES FOR DELIVERING SUSTAINABLE GROWTH

The PfSH authorities will, where necessary and appropriate, plan for strategic scale development to meet the need for housing through local plans. In bringing forward such sites, a masterplanned approach will be employed through delivering a mix of uses across the sites and the development of design codes where needed.

Making efficient use of land

- 6.12. Section 4 clearly sets out the constrained nature of South Hampshire and there are limited options for its future development. As a result, it is critical that in bringing forward broad locations for growth, optimal use of each site is made and that schemes which would fail to make efficient use of land are not pursued.

- 6.13. To achieve the best transport and placemaking outcomes and avoid locking in car dependency, strategic growth should be planned comprehensively and at sufficient scale and density to make a significant contribution to supporting viable bus services and other local services/facilities or be adequately served by existing services. Individual local plans will need to set out locally specific density policies, with the intention of making the most efficient use of the land available whilst respecting the constraints and the local character of the area.
- 6.14. Greenfield sites developed at low density are less likely to reduce car use to the extent necessary. Development which is predominantly car dependent and not well-connected results in:
- The highest levels of carbon emissions
 - Low levels of community cohesion
 - Excessive pollution
 - Worsening of existing congestion on local and strategic routes
 - Poor health outcomes.
- 6.15. There is a significant demand for land to provide for open space and recreation needs, Biodiversity Net Gain, nature recovery, nutrient mitigation, recreation and disturbance mitigation, natural flood risk management and potentially carbon offsetting. In a number of cases the same areas of countryside land can be used to achieve multiple aims.
- 6.16. The concept of land markets for environmental mitigation is relatively new and given the pressures on land use in South Hampshire, the PfSH authorities will need to ensure that the benefits of environmental mitigation are maximised for different purposes. For example, land taken out of intensive agricultural use for nutrient mitigation could also provide access to natural greenspace for the existing population, alongside tree planting to provide natural flood risk management.

SPS5: STRATEGIC PRINCIPLES FOR MAKING EFFICIENT USE OF LAND

In addressing the need for housing in the sub-region, the PfSH authorities will do so in a way which optimises the use of land as a finite resource. This will include prioritising the use of city and town/district centres and other accessible sites where the density of development can be higher.

Nonetheless, local plans will ensure that on all sites which are brought forward, the density of the development should optimise the capacity of the site in a manner appropriate to its context whilst delivering high quality design.

Integrating land use and transport planning

- 6.17. This cycle of strategic planning presents significant challenges to achieving sustainable development. The cities/urban areas first approach can still deliver

significant growth and it is important that this is prioritised. This should still be the ambition as areas of brownfield land become available for redevelopment (e.g. Tipner, Blockhouse or Southampton City Centre West). To support this approach it is important that there is investment in sustainable transport infrastructure and public realm to fully capitalise on accessibility and the ability to achieve carbon reductions. Nevertheless, there is ultimately a limit to the availability of urban sites. Where densities are already high opportunities for further intensification may be limited – tall buildings are one approach but may not be acceptable for all locations.

- 6.18. Brownfield sites within the existing urban areas present the best approach for achieving transport orientated integrated development that supports sustainable and active travel. However, accessible greenfield sites outside of the existing urban areas will also need to be considered. As distance increases between development and key trip destinations the viability of road-based public transport decreases.
- 6.19. Development on greenfield sites is less likely to reduce car use, often due to their location away from urban areas where public transport services are less frequent or active travel routes are longer. To avoid locking in car dependency, planned new developments (alone or in combination) should be of sufficient scale and density to help make active travel choices a natural option and make public transport services viable, or be located to connect to existing services and to support the provision of new retail/community facilities. Where car trips are necessary the switch to electric vehicles/renewable energy will be an important part of decarbonisation.
- 6.20. The local transport plans, regional and sub-regional transport plans and strategies are evolving and will take effect over the next few decades as new local plans are formed. Transport for the South East's (TfSE) Regional Transport Strategy and subsequent Strategic Investment Plan (SIP) cover the Solent area. These include a focus on implementing a Solent Metro rail system, Mass Transit Networks in the city regions, active travel infrastructure, significant/vital highway schemes and other transport projects. The total cost of identified transport infrastructure in the Solent is £6bn in the period to 2050.
- 6.21. Solent Transport is developing a new sub-regional transport strategy for the Solent area. This will take the headline plans identified in the SIP to the next level of detail and providing delivery plans of infrastructure to sustainable development, the Local Transport Authorities (LTAs), and Network Rail or National Highways, will be the scheme promoters for prioritised schemes in the Implementation Plans. This presents an opportunity for the LPAs within PFSH to continue to work alongside the LTAs to integrate and help secure and safeguard the transport investment plans alongside emerging land use allocations in local plans.
- 6.22. The movement of goods and freight is an important part of the South Hampshire transport network, providing access to the Ports of Southampton and

Portsmouth – both parts of the Solent Freeport. Development will increase demand for goods and enhancements to capacity of freight facilities will be required (and to support decarbonisation). This would adapt to the changing patterns of freight, including making the most of innovations in sustainable first and last mile delivery. The location of residential and commercial development presents opportunities to reduce the number of larger goods vehicle trips on roads through a shift to rail or smaller zero emission vehicles.

6.23. Many of the schemes would, if funded, enable sustainable development opportunities (including transport orientated integrated development) and offer the potential to open up sites previously regarded as unsuitable. This particularly includes those schemes in South Hampshire related to developing a better rail and mass transit network, including along key corridors from main destinations (e.g. town/city centres) to existing residential areas and potential growth areas. The key to ensuring that this issue is addressed in the future is for LPAs and LTAs to work collaboratively with early engagement in the preparation of their respective plans, delivery strategies, projects and funding bids, to ensure that land use and transport planning approaches are effectively integrated and mutually supportive in terms of both strategic planning and implementation outcomes. A co-design approach of this nature is likely to produce the best outcomes in line with the PfSH and LTP visions.

SPS6: STRATEGIC PRINCIPLES FOR INTEGRATING LAND USE AND TRANSPORT PLANNING

The PfSH Local Planning Authorities will work together, and in partnership with the Transport Authorities, to promote the location and form of development in local plans (and investment in transport infrastructure) that will support the delivery of a de-carbonised and accessible transport system.

The PfSH authorities will support the implementation of the Local Transport Authorities' Local Transport Plan 4 (and subsequent strategies that support transport decarbonisation), Transport for the South East's Strategic Investment Plan and the forthcoming Solent Transport Strategy, particularly where that support can be provided through decisions on the location and form of new development and help to provide opportunities for development that is not dependent on private car use to meet transport needs.

The preparation of the integrated transport plans and strategies above will support the implementation of local plans.

Delivering housing growth

Housing need and supply

6.24. There continues to be a major need to provide new homes for a growing and ageing population and for an increasing number of households. The Government is seeking to significantly boost the supply of housing nationally with its standard

method used to determine the extent of local housing need for local authorities. The standard method uses a formula based on projected household growth (from the 2014-based household projections), adjusted to reflect housing affordability in an area. It provides a starting point to determine the housing requirement for each local authority, unless exceptional circumstances justify an alternative approach (NPPF, paragraph 61).

6.25. Using the affordability data from 2023, the standard method figures are shown in Table 1 below. For Southampton, this figure includes the Government's 35% uplift, applied to England's twenty largest towns and cities after the standard housing method figure is calculated. The uplift does not represent an additional demographic need for homes. It was designed to direct development to the largest urban areas, maximising existing infrastructure and prioritising the use of brownfield land. In line with the emerging national policy consultation at the time this statement was being prepared, any unmet need arising from this uplift has therefore not been apportioned to neighbouring areas, which would simply encourage more greenfield growth contrary to the aim of the uplift.

6.26. It is difficult to provide a definitive comparison between housing need and supply within the PfSH area, given the different stages reached in preparing local plans, the annual changes to the standard method figures, uncertainties over future Government policy and the fact that there are some 'split' districts. Table 1 can only provide a rough snapshot of the situation at a point in time and the true extent of any authority's unmet needs will ultimately be determined through the local plan process.

6.27. Table 1 collates figures for local housing need in South Hampshire.

Table 1: Comparison of housing need and supply 2023 – 36

Local Authority	Annual Housing Need using Standard Method (dpa)	Total housing need 2023 – 2036	Identified Supply = Commitments, local plan allocations + windfall estimate	Shortfall/ surplus
East Hants (part)	113	1,469	1,275	-194
Eastleigh	667	8,671	6,160	-2,511
Fareham	541	7,033	9,356	+900 ¹⁰
Gosport	353	4,589	2,518	-2,071
Havant	516	6,708	4,105	-2,603
New Forest	1,056	13,278	8,076	-5,652
Portsmouth	899	11,687	11,304	-383
Southampton	1,475	19,175	15,951	0 ¹¹
Test Valley (part)	182	2,366	3,109	+743
Winchester (part)	235	3,055	3,055 ¹²	0
Total	6,037	78,481	64,909	-11,771 ¹³

6.28. The assessed housing need for the local authority areas within the PfSH area to 2036 is approximately 78,500 homes. Without the Southampton urban uplift, this overall level of growth signified by the current methodology for calculating housing need falls to approximately 75,000 homes. However, the uplift still needs to be considered within Southampton (see footnote 10).

¹⁰ The Fareham Local Plan 2037 Policy H1 housing requirement includes a standard method based housing need, and a commitment of 800 dwellings as a contribution towards Portsmouth's unmet need as well as a further 100 dwelling contribution to the wider PfSH unmet need as identified in the surplus. The adopted housing supply incorporates a number of dwellings to meet the unmet need contribution and a 7.5% contingency to offset where delivery on some sites does not match expectations, as per government policy.

¹¹ Whilst Southampton's shortfall on the housing target is 3,224, this is only due to the Government's 35% urban centres uplift, without it there would be a surplus of 1,755 dwellings. However, this shortfall should be expressed as 0 in the assessment of the PfSH-wide shortfall/surplus as it would not be appropriate to apportion to other authorities.

¹² The actual supply within the PfSH part of the district is higher than 3,055. Winchester does not have a split in its adopted Local Plan between PfSH and the rest of the district, meaning that the figures for need and supply are estimated to be the same in this table.

¹³ This figure is calculated as the sum of each authority's shortfall/surplus rather than subtracting the total sub-regional supply from total sub-regional need to establish the shortfall.

6.29. Since the Spatial Position Statement was published in 2016, significant progress has been made on several local plans in the PfSH sub-region. Since this date the following plans have been adopted:

- New Forest National Park Local Plan (2016 – 2036), formally adopted on 29 August 2019 and makes provision for 800 dwellings in the National Park over the Plan-period.
- New Forest District Local Plan (2016 – 2036), formally adopted on 6th July 2020 and makes provision for 10,420 dwellings in the part of the district outside of the National Park over the plan period.
- Eastleigh Borough Local Plan (2016 – 2036), formally adopted on 25th April 2022 and makes provision for 11,970 dwellings over the plan period.
- Fareham Borough Local Plan (2021 - 2037), adopted on 5th April 2023 and makes provision for 9,560 dwellings over the plan period, including 900 dwellings towards unmet need, 800 specifically for Portsmouth and 100 for the wider sub-region.

6.30. For the period to 2036, there is a significant amount of supply (approximately 65,000 homes) already identified. The supply of 65,000 homes has been calculated by adding commitments in the form of planning permissions¹⁴, adopted local plan allocations and made Neighbourhood Plans and other urban¹⁵ sites (either windfall or sites identified in strategic housing land availability assessments (SHLAAs¹⁶)). Windfall developments such as small infill sites are not specifically identified in development plans but represent important sources of supply and are predominantly urban sites.

6.31. It is recognised that some LPAs are at an earlier stage in the preparation of their local plans. As part of these emerging local plans, additional sites will be identified and brought forward for these areas and consequently the housing supply figures will increase, and the level of unmet need will decrease.

6.32. The PfSH Statement of Common Ground (SoCG) will be updated to reflect progress in local plans from Regulation 19 consultations through to adoption, with consequential adjustments to the housing supply figures. The SoCG will also be updated to report the latest standard method figures for local housing need, to incorporate revised affordability data and any changes in the methodology.

6.33. The PfSH authorities are taking a two-stage approach to addressing the needs of those authorities that may demonstrate that they are unable to meet their

¹⁴ These may include C2 units with the ratio in the Housing Delivery Test Measurement Rule Book applied to give the C3 equivalent. C2 bedspace units as C3 equivalents are not currently included for Test Valley Borough Council, but their supply figures do include C2 single dwellings.

¹⁵ SHLAA sites and other urban sites are included when they form part of the LPA housing land supply and are within existing settlement boundaries. SHLAA sites for New Forest District outside of settlement boundaries are also included as this source of supply has been tested through the examination of the Part 1 Local Plan and was found sound.

¹⁶ SHLAAs may also be referred to as SLAAs (Strategic Land Availability Assessments), HELAAs (housing and economic land availability assessments) or SHELAAs (strategic housing and economic land availability assessments)

housing needs in full. Stage one: in the short to medium term the following authorities should be able to meet and potentially exceed NPPF 2023 standard method-based housing needs in their respective local plan areas:

- East Hampshire
- Eastleigh
- Fareham
- Test Valley
- Winchester.

6.34. Stage two: in the longer term, the Broad Areas of Search for Growth, identified in SPS8 below, will be considered in local plans, including the contribution they can make to ongoing unmet housing need in the sub-region.

6.35. In order to effectively meet housing needs, local plans will consider further the appropriate mix of housing for their area, including different types and sizes, market and affordable housing. This will include meeting specific needs, such as senior housing, including extra care housing, which meets the needs of an ageing population. A balanced provision of different sizes of development schemes is sought – recognising that larger schemes can better support provision of new infrastructure and drive delivery; whilst also recognising the role which smaller sites will play in boosting delivery in the short to medium term.

Strategic housing development

6.36. This Spatial Position Statement addresses the approach to strategic-scale housing development across the sub-region. At this scale of development, new homes will be accompanied by new employment, local services and infrastructure. Strategic development locations include sites already with planning permission and allocations in adopted local plans. Therefore the approach to delivering strategic development consists of:

- Locations identified in the existing PUSH Spatial Position Statement 2016 which continue to be suitable for major growth and are being progressed to delivery
- Other locations with commitments for strategic developments
- Broad Areas of Search for Growth to be considered through local plans.

6.37. Alongside these strategic development locations, small and medium sized development sites allocated through individual local plans and coming forward as emerging plans progress will continue to contribute towards overall housing delivery.

Existing strategic development locations

6.38. This Spatial Position Statement retains the strategic principle of focusing growth on cities/urban areas first to maximise housing delivery within existing urban areas (and/or locations which support modal shift in transport). Therefore the cities of Portsmouth and Southampton continue to be identified as suitable strategic development locations. Since the publication of the Position Statement (2016), the other locations identified in SPS7 below have all been allocated for significant amounts of development in adopted local plans and are at different stages in their development. They will continue to deliver development over the course of this Spatial Position Statement.

6.39. Due to the nature and scale of committed developments identified in local plans, there are additional locations that can also be considered as existing strategic developments. These will also deliver new development over the course of this Spatial Position Statement.

SPS7: STRATEGIC PRINCIPLES FOR EXISTING STRATEGIC DEVELOPMENT LOCATIONS

The PfSH authorities will continue to bring forward development in the following strategic development locations identified in the previous PUSH Spatial Position Statement 2016. These locations continue to be appropriate for mixed use development over the course of this Position Statement:

- Portsmouth Urban Area and City Centre
- Southampton Urban Area and City Centre
- Fareham Town Centre
- West of Waterlooville (Havant/Winchester)
- Welborne (Fareham)
- North Whiteley (Winchester)
- Gosport Waterfront

In addition, the following locations are considered existing strategic development locations due to site allocations in local plans:

- Boorley Green (Eastleigh)
- One Horton Heath (Eastleigh)
- Land north of Totton (New Forest)
- Land South of Longfield Avenue (Fareham)
- Land west and north of Marchwood (New Forest)
- Former Fawley power station (New Forest)
- Land south and east of Ringwood (New Forest)
- Land north and west of Fordingbridge (New Forest)
- Tipner (Portsmouth)
- Whitenap, Romsey (Test Valley)

Broad Areas of Search for Growth

6.40. The review of the Spatial Position Statement (2016) and the need to plan where further strategic growth may take place in the medium/longer term, initiated work to identify Broad Areas of Search for Growth. These were identified as potential areas for strategic development in accordance with the approach to:

- Focus development on locations with a relative lack of significant constraints, both national constraints listed in the NPPF and additional constraints of subregional importance; and
- Focus development at locations which are most accessible by public transport, walking and cycling, or have the potential to be made accessible.

6.41. Work undertaken to map significant constraints on development and accessibility by sustainable transport, has resulted in seven areas of search being identified. Subject to further detailed assessment, these areas are considered potentially the most sustainable options for new strategic development with a relative lack of constraints and good sustainable transport provision or potential. In total, they are estimated to have sufficient capacity to provide approximately 9,700 dwellings, again subject to further testing of development capacity, the infrastructure and mitigation needed and deliverability. These new homes will be delivered alongside new employment, community and other uses as part of a mixed-use development.

SPS8: STRATEGIC PRINCIPLES FOR NEW BROAD AREAS OF SEARCH FOR GROWTH

The following locations are identified as broad areas of search for sustainable strategic-scale development to potentially deliver a combined total of approximately 9,700 homes. The suitability and deliverability of these areas will be considered in the relevant Local Plans:

- **South-east/east of Eastleigh Town (Eastleigh)**
- **Havant Town Centre (Havant)**
- **Waterlooville Town Centre (Havant)**
- **Southleigh (Havant)**
- **East of Romsey (Test Valley)**
- **South-west of Chandler's Ford (Test Valley)**
- **East of Botley (Winchester)**

6.42. These areas are not identified as strategic development allocations as there is significant further work required to be undertaken through the relevant individual

local plan processes. The broad areas of search will be considered alongside other options for growth put forward in the preparation of individual local plans. While they will potentially make a significant contribution to accommodating housing needs, further sites will still be required across South Hampshire. Given the lead in times for larger sites, it is likely that the Broad Areas of Search for Growth, or other strategic options for growth taken forward in local plans, will continue to deliver new development well beyond 2036 and provide a longer-term strategic direction for new development.

Delivering employment growth

- 6.43. PfSH has long been focused on the importance of delivering economic growth alongside increasing housing delivery. This Spatial Position Statement has already highlighted the focus on green growth following the pandemic, and all PfSH authorities have since inception of the partnership, and long before, understood the importance of the Solent maritime economy, alongside other traditional economic sectors.
- 6.44. In March 2021, PfSH published the Economic, Employment and Commercial Needs (including logistics) Study which establishes the need for employment development in South Hampshire as c. 392,000 sqm (gross) for office and c. 168 ha (gross) for industrial floorspace up to 2040. The study sets an ‘aspirational’ need for office development in recognition of the time it may take before the market starts to reinvigorate itself to deliver new development.
- 6.45. The Study demonstrates that there is currently sufficient land allocated within South Hampshire (405,666 sqm for office and 231 ha for industrial) 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. Nevertheless, in some cases strategic infrastructure investment will be required to deliver employment sites.
- 6.46. The Study has concluded that there is significant headroom within the standard method housing figures to accommodate substantially more new jobs than the forecasts suggest are needed. This means that potential nationally significant investments such as the expansion of the Port of Southampton or the successful development of the Solent Freeport sites would not necessarily increase housing need at the PfSH level, although there may be additional demand locally.
- 6.47. Individual LPAs will need to consider long term provision of employment land through the local plan process. When considering how much land to allocate, the recognition of losses needs to be considered by each LPA, although the surplus of office and industrial sites would potentially enable some further losses without the need to allocate new sites. Some of the industrial need figures for individual LPAs indicate a negative need. This should not be taken in itself as a policy requirement to reduce the stock of industrial sites in these areas, as industrial

vacancy rates are low and sites are meeting the needs of local businesses. Again, individual LPAs will consider this issue further.

6.48. The Study also made recommendations for the LPAs to consider allocating land for an additional five new sites across South Hampshire, in highly accessible locations (to the motorway network), for larger warehouses. This need is an estimate and depends on the suitability and availability of sites which should be at least 8 – 10ha in size. The demand for this type of use is footloose but also services an area larger than a single district and is additional to the smaller-scale logistics take up that can be expected within traditional industrial sites.

6.49. PfSH's view is that there are no readily available sites that meet the size criterion, are on flat land and with easy access to the Strategic Road Network. PfSH is not therefore carrying out further work to ascertain if the sub-regional need can be met and individual LPAs will need to consider planning applications as they come forward to meet demand.

6.50. There have been significant national and indeed international economic changes that have impacted the economy of South Hampshire both during and since the preparation of the Stantec Study published in 2021, relating to the Covid-19 pandemic, Brexit and the Russia-Ukraine conflict. There have also been sub-regionally significant developments, notably the designation of the Solent Freeport.

6.51. Solent 2050¹⁷ is the new economic strategy for the Solent Local Enterprise Partnership (LEP), which looks ahead to levelling-up and greening the sub-regional economy in the wake of the Covid-19 pandemic and establishing new trading relationships with the rest of the world. Its vision for the Solent in 2050 is: *'to be the globally leading maritime cluster and at the forefront of innovations to adapt to climate change, with towns and cities that are fantastic places to live, trade and with opportunities for all our communities to flourish.'* This is closely aligned with the economic aspirations of PfSH set out in this Spatial Position Statement and individual local plans.

Solent Freeport

6.52. The Solent Freeport is one of only eight Freeports in England announced by the Chancellor in the 2021 Budget and formally confirmed in 2022. The location of the eight sites making up Solent Freeport are shown in figure 4.

6.53. Freeports are an important part of the UK's post-Covid economic recovery. The aim is that Solent Freeport will unlock billions of pounds' worth of investment, create tens of thousands of new jobs and level up our coastal communities. Freeports are areas designated by the Government that will benefit from incentives to encourage economic activity. Freeports operate with both 'tax' and 'customs' sites and both types exist in the Solent, Portsmouth Port and the Solent

¹⁷ <https://solentlep.org.uk/media/4289/60410-solent-2050-updated-130422.pdf>

Gateway are customs sites, whilst the other seven sites are tax sites. The majority of the Freeport sites by area are located within the Waterside area of New Forest District. Tax sites offer occupiers business rates relief and other incentives to support capital investment, skills and employment. Business rates growth generated at the tax sites can be retained locally and reinvested in the area. Customs sites help enable the tariff-free movement of goods for both export and import through simplified customs procedures. Each Freeport site has an outer boundary which is the area where the Freeport's regeneration spending and innovation measures can be used to generate prosperity for the region.

6.54. The delivery of a Freeport network is of national economic importance. However, it should not be to the detriment of the environment. It should also contribute to progress made towards the UK's 2050 net zero target. The development, and any subsequent growth, of Freeports and their supporting infrastructure covers a range of sites. Some will pose significant environmental risks to land and sea. Therefore, stringent policies need to be in place and upheld by all relevant parties to ensure that as the network is established, and later developed, there continues to be appropriate consideration of environmental issues and impacts, particularly relating to the protection of key environmental assets and achieving national environmental targets.

6.55. Freeport development will have wider strategic planning and infrastructure implications for the wider PfSH area. It is estimated that 16,000 new jobs could be created from the Freeport together with £500m in retained business rates to fund improvements in the local area.

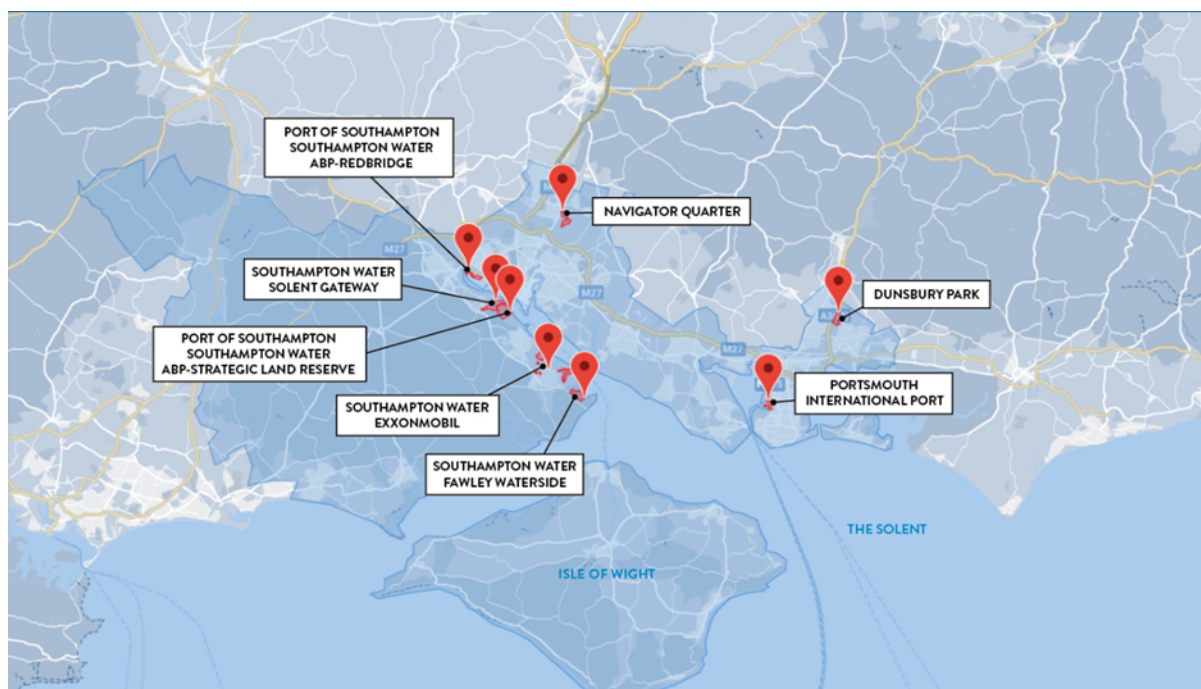


Figure 4 – Solent Freeport Sites

Delivering environment and landscape outcomes

- 6.56. A key priority for the PfSH authorities is to ensure that the natural environment and important landscape areas and features are protected and enhanced alongside providing for the new development needed.
- 6.57. To conform to the requirements of the Conservation of Habitats and Species Regulations 2017 and the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 the PfSH authorities have to ensure that further development avoids harm to designated sites. Given the economic and social imperatives for growth and the significant extent of high priority environmental designations in the PfSH area, development often needs to provide mitigation to ensure that adverse impacts are avoided.
- 6.58. The principle and practice of mitigating the potential adverse impacts of new development on the environment is well established in the PfSH area. In particular, there are established approaches for mitigating development impacts on water quality, air quality and from increased recreational pressure. These approaches and potentially the areas affected have evolved over time, and may continue to evolve, to reflect monitoring information, best practice learning and new evidence.

Nutrient neutrality

- 6.59. Eutrophication levels in the Solent have reached the point where designated sites are in unfavourable condition. Elevated levels of nutrients – in particular nitrogen in saline environments and phosphorus in freshwater environments – leads to eutrophication and algal blooms, which can harm or kill aquatic organisms and the species that rely on them. Agricultural sources are the main source of both nutrients, followed by wastewater treatment for the existing population.
- 6.60. In 2019, Natural England advised that harm to the designated sites cannot be ruled out from the additional development of housing or other overnight accommodation¹⁸, as each adds to total urban surface water runoff and to the amount of treated sewage discharged. A requirement was introduced that any new accommodation development in catchments draining into the Solent must be 'nutrient neutral' in relation to total nitrogen. In 2022, a requirement for nutrient neutrality in relation to total phosphorus¹⁹ was added for the River Itchen.

¹⁸ Housing, care and other residential institutions and visitor accommodation. In general terms the impact of additional employees is already captured by the resident population, but some other forms of development may have an impact, particularly if they are water-use intensive or attract significant numbers of visitors from outside the region.

¹⁹ Phosphorus neutrality is also required in the Hampshire/Wiltshire River Avon catchment. Work in the Avon catchment is coordinated outside of PfSH so it is not directly addressed in this Spatial Position Statement. The same principles and considerations are applicable.

- 6.61. Nutrient neutrality means that new accommodation development in these catchments must not add to the existing level of nutrients in the environment. Natural England advice²⁰ is that mitigation to offset a development must be in the same drainage catchment as that development. Mitigation must be provided at or upstream of the point where treated wastewater discharges impact on the designated site.
- 6.62. For nitrogen a range of mitigation providers are currently available to developers, offering choice and competition in the supply of credits, sufficient to support housing development in the short to medium term in most Solent drainage catchments. Developers also have an option to devise their own scheme of nutrient mitigation. Work is underway to bring forward mitigation schemes to address the more recent phosphorus neutrality requirement in the river Itchen catchment. There is sufficient phosphorus mitigation for the medium term in the lower Itchen, but mitigation credits are currently in short supply for the middle to upper Itchen catchment.
- 6.63. The Levelling Up and Regeneration Act includes a requirement on water companies to upgrade wastewater treatment works²¹ in 'nutrient neutrality' areas by 2030, to remove nutrients to 'technically achievable limit' (TAL) standards²². When implemented the total amount of mitigation required in the PfSH area would significantly reduce from 2030, with the reduction predominantly benefitting locations served by treatment works that do not currently have permits in place to limit nutrient discharges. Current and additional schemes of mitigation would continue to be required for the reduced nutrient load remaining.
- 6.64. To ensure that development can continue to be nutrient neutral additional mitigation projects will need to be bought forward for the foreseeable future, to maintain a sufficient and competitive credit supply market in all PfSH area catchments. Local plans will need to consider how the nutrient burden of planned and future development will be minimised and mitigated, and how they may be able to help deliver or to enable sufficient future nutrient mitigation projects to come forward. PfSH-wide this will require significant investment, and potentially very significant land take if agricultural land set-aside continues to be the predominant method of nitrogen mitigation. Alternatives such as some types of wetland are more land-efficient with less impact on food production capacity.

Recreational disturbance – Solent Waders and Brent Geese

- 6.65. Three Special Protection Areas (SPAs) are designated in the Solent to protect overwintering ducks, geese and wading birds and the core habitats they rely on: Solent and Southampton Water, Portsmouth Harbour and Chichester & Langstone Harbours. These sites are additionally designated as 'Wetlands of International Importance' (Ramsar sites). Solent and Southampton Water, Solent and Dorset Coast and Chichester & Langstone Harbours SPAs are also

²⁰ [Nutrient Neutrality Generic Methodology \(NECR459\)](#)

²¹ Serving a population of 2,000 or more

²² Currently 10mg/litre for total nitrogen, and 0.25 mg/litre for total phosphorus.

designated to protect summer breeding birds, which include various species of tern and the Mediterranean gull.

6.66. New development in the PfSH area is contributing, alongside wider recreational trends, to increased recreational pressure on the coast - notably from kitesurfing, kayaking, paddleboarding and walking, but especially dog walking off-lead. Recreational pressure can disturb breeding or overwintering birds, and risk of harm must be mitigated.

Map 1: The 3 SPAs and a 5.6km buffer of these site. Background red shading indicates housing density.

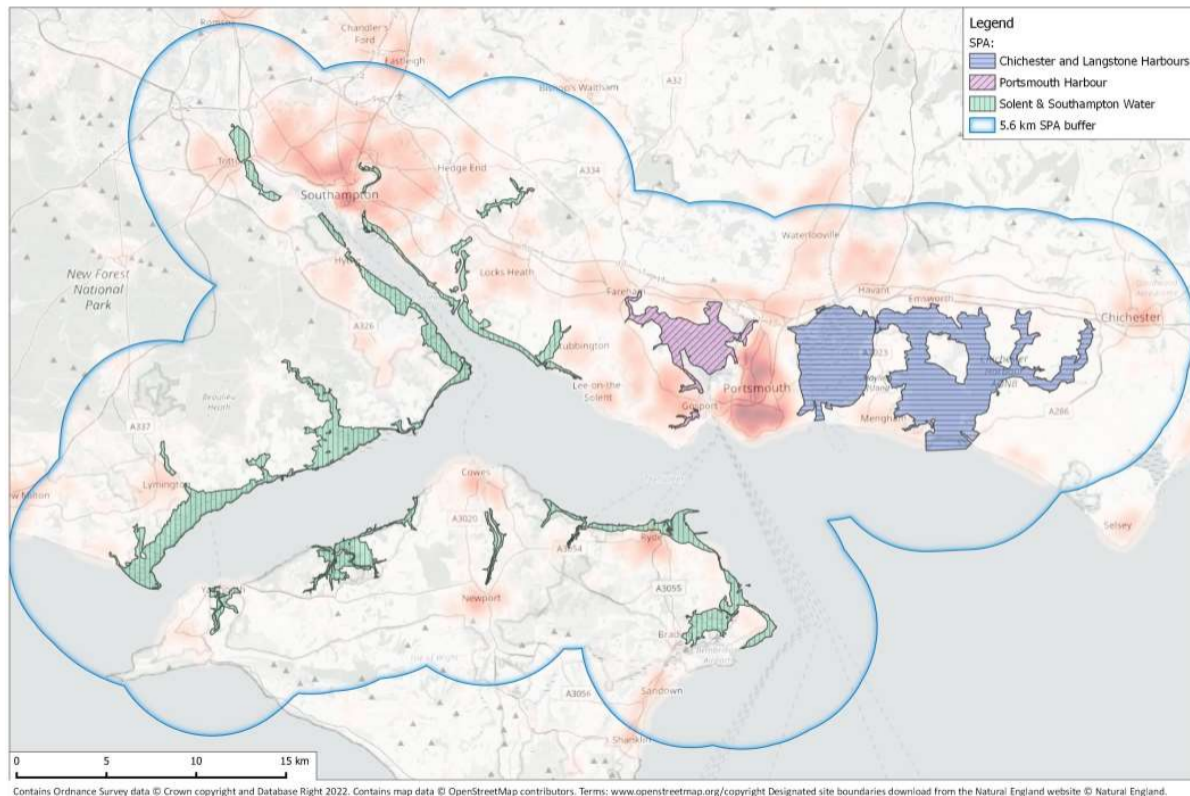


Figure 5: Map from p11 [Bird-Aware-Solent-Strategy-Review-FINAL.pdf](#) (birdaware.org)

6.67. In response PfSH led on the development of a strategic scheme of mitigation and its subsequent implementation and governance. The Solent Recreation Mitigation Strategy, branded Bird Aware Solent, enables residential development to continue whilst protecting the natural environment from harm by reducing potential recreational impacts. Development within 5.6km of the Solent coastline is required to contribute to a package of ranger services, Suitable Alternative Natural Green Spaces (SANGs) and other mitigation schemes, prepared by individual planning authorities and other partners to mitigate the impacts of development.

6.68. An Initial review of the effectiveness of the Bird Aware Solent strategy (2023) covering the first five years of operation concludes that significant mitigation measures have been delivered and appear to be having a positive effect, but that mitigation provision may need to be scaled up and further targeted. This needs to be considered further before conclusions are drawn. The PfSH authorities are committed to continuing to support the Bird Aware strategy, which will be

extended beyond its current 2034 end date to support future local plans. There is also a need to consider the conclusions of research in progress on whether increasing recreational disturbance from new housing is likely to impact on summer breeding birds in the Solent and Southampton Water and Chichester & Langstone Harbours SPA and Ramsar sites.

Solent Waders and Brent Geese – functionally linked roosting and grazing land

6.69. The continued availability of a sufficient range and spread of suitable winter feeding and roosting areas is critical to the survival of the overwintering wading birds and Brent Goose populations. Feeding and roosting sites lie mainly outside of, but are functionally linked habitat to, the Solent areas designated as SPA and Ramsar sites. This functionally linked land contributes to the achievement of the conservation objectives of the designated sites and legal caselaw confirms the need to consider impacts on functionally linked land from planned development.

6.70. The Solent Waders and Brent Goose Strategy identifies, based on field surveys, a network and hierarchy of core and supporting areas that are important to over-wintering waterfowl. The strategy seeks to protect the more important sites from development and recreational pressure, to enhance them where possible, to ensure that the network of sites will be resilient to the pressures of climate change including predicted sea level rise, and to ensure that a reasonable geographic spread of sites is maintained. PfSH considers that this land should be recognised as a constraint to new development and taken into account when considering the overall capacity of the sub-region to accommodate new development.

6.71. The Solent Waders and Brent Goose Strategy recognises that there are other land use pressures and demands in the Solent, and that on a case-by-case basis the development of a feeding and roosting area may, following Appropriate Assessment, be justified. In such circumstances significant on-site mitigation, or off-site mitigation in the immediate vicinity, would be required in accordance with published Guidance on Mitigation and Off-setting Requirements.

Recreational disturbance – New Forest

6.72. New development in the PfSH area (within the 13.8km zone of influence) is also contributing to increased recreational pressure on the internationally designated sites within the New Forest National Park. The breeding habitats for important bird species protected by designated SPA and Ramsar sites within the National Park are sensitive to disturbance from visitors, especially in the spring breeding season as some are ground-nesting. Recreational use can also physically damage protected areas and flora designated through the New Forest Special Area of Conservation (SAC).

6.73. A partnership²³ commissioned Footprint Ecology to carry out research²⁴ into recreational use of the New Forest's designated sites and the impacts of planned new development. A range of information on visitor activity was collated²⁵ to identify a 'zone of influence' or 'catchment area', extending 13.8km from the boundaries of the SAC/SPA/ Ramsar designated sites, within which visitors from new development are likely to have (to varying degrees) a significant impact on those designated sites. It extends into parts of Dorset and Wiltshire. Footprint Ecology also recommend that developments of 200 or more homes just outside²⁶ the zone of influence should be subject to assessment under the Habitat Regulations and may also need to provide mitigation.

6.74. Further work is underway (as at 2023) to consider these findings, undertake further surveys where necessary and establish a strategic approach to mitigating recreational pressures on the New Forest. Mitigation will consist of a package of mitigation measures, including the provision of new and enhanced recreational greenspaces in areas surrounding the New Forest and access management and monitoring measures within the designated sites. Other mitigation arrangements will continue to need to be provided alongside this within some PfSH planning authorities as an interim measure while work on a more strategic approach continues. The focus of the strategic mitigation work is on access management and monitoring measures within the New Forest's designated sites, complementing the recreational greenspace provision and enhancements being delivered by LPAs within their administrative areas.

²³ Eastleigh Borough Council, Fareham Borough Council, New Forest District Council, The New Forest National Park Authority, Southampton City Council, Test Valley Borough Council and Wiltshire Council, working with Natural England and the Forestry Commission.

²⁴ [Research into recreational use of the New Forest's protected habitats - New Forest National Park Authority \(newforestnpa.gov.uk\)](https://www.newforestnpa.gov.uk/app/uploads/2021/08/New-Forest-zone-of-influence-report-2021.pdf)

²⁵ <https://www.newforestnpa.gov.uk/app/uploads/2021/08/New-Forest-zone-of-influence-report-2021.pdf>

²⁶ 13.8 – 15km from the boundary of the New Forest SAC/SPA/R Ramsar sites.

Map 1: Home postcodes of those on a short visit directly from home with the 13.79km buffer of the New Forest SAC/SPA/Ramsar site

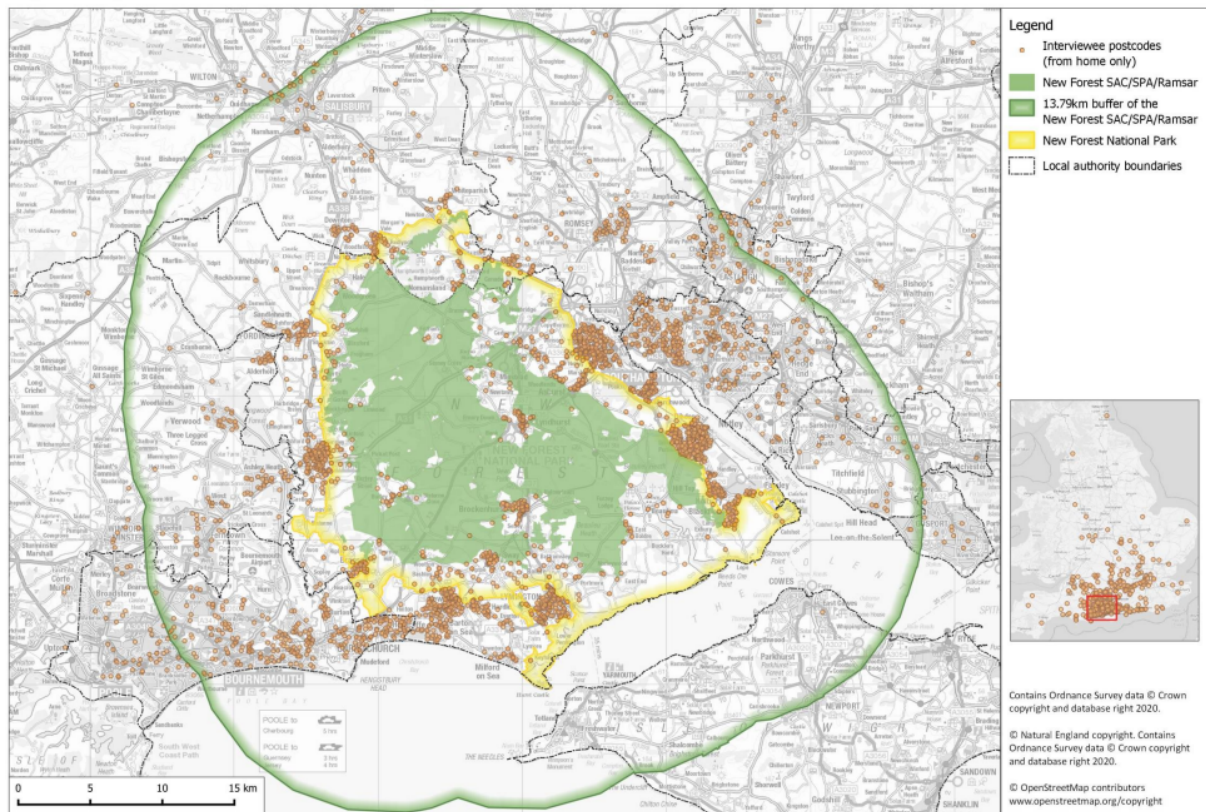


Figure 6: Map showing 13.79km buffer of New Forest SAC/SPA/Ramsar - source p13 [Research into recreational use of the New Forest's protected habitats](#) (Footprint Ecology 2021)

Nature recovery and biodiversity net gain

6.75. PfSH authorities will need to consider how their local plans can help to secure nature recovery at both local and cross boundary scale, and the potential role of local plans to identify and facilitate the delivery of sites suitable for providing Biodiversity Net Gain (BNG) to support planned growth.

6.76. Hampshire County Council was appointed by the Secretary of State to lead the preparation of the Hampshire Local Nature Recovery Strategy (LNRS), work which will cover the full PfSH area and involve authorities²⁷ and other stakeholders. Future local plans in the PfSH area must have regard to the forthcoming Hampshire LNRS²⁸, which will:

- map the most valuable existing habitat for nature
- map proposals for creating or improving habitat for nature and wider environment goals
- agree priorities and targets for nature recovery; and
- support the delivery of wider environmental objectives.

6.77. It is likely that a significant supply of BNG units will be needed across the PfSH area to enable development on sites with limited scope for on-site BNG

²⁷ The Environment (Local Nature Recovery Strategies) (Procedure) Regulations 2023

²⁸ [Local Nature Recovery Strategy-2023-07-13-LEMH2050 Decision Day \(hants.gov.uk\)](#)

enhancement – such as small infill or some brownfield sites, or in locations where a more intensive development footprint is appropriate. Habitats provided as BNG will need to be secured and monitored for at least 30 years.

6.78. In response to this wider environmental agenda and steered by the PfSH Water Quality Working Group, the expanded remit of the PfSH Strategic Environmental Planning team now encompasses local nature recovery and BNG, as well as nutrient neutrality and other aspects of water quality and water supply. A PfSH priority is to identify and enable or deliver opportunities to achieve strategic environmental solutions providing, and where possible stacking, multiple natural capital service benefits, including green infrastructure provision.

Water Quality and Quantity

6.79. The Solent area includes a significant proportion of the country's unique chalk stream habitats, which together with the underlying chalk aquifers have historically provided a significant proportion of the area's drinking water. It is also an area in serious water stress, where water demand accounts for a high proportion of effective rainfall or is likely to in the future (including due to climate change). Riparian and groundwater abstraction by water companies is being progressively reduced, to ensure that legislative requirements to sustain the quality of chalk stream habitats, other water bodies and the wider environment are met.

6.80. The PfSH authorities will continue to work collaboratively with partners such as the Environment Agency, Natural England, Southern Water and Portsmouth Water to support improvements in water quality and to make effective use of existing water resources. The Environment Agency encourages local planning authorities to continue to require at least the higher Building Regulations standards for water use efficiency in new development, and the exploration of other opportunities to reduce water consumption and improve water use efficiency, and to formalise this in local plans.

Air quality

6.81. Air quality is a strategic issue that needs continued collaborative working amongst PfSH authorities. Emissions from transport in particular, but also from some industries and domestic fuel burning, can be significant causal factors of poor air quality locally, affecting both human health and the natural environment, as well as contributing to climate change. PfSH previously commissioned an [Air Quality Impact Assessment](#) which was published in 2018.

6.82. The level and concentration of key airborne pollutants are influenced by the location of new development and by transport options and choices. The wider UK trend is improving air quality due to factors such as de-industrialisation in the UK and in Europe, a trend likely to continue if these economies continue to progressively move away from fossil fuel combustion for electricity, transport and

heat. However, poor air quality continues to be a problem in some PfSH locations, and climate change may exacerbate some effects. The current response required by the Government in areas with the most serious risks to human health is the introduction of Clean Air Zones which have been implemented in Portsmouth and Southampton (equivalent).

6.83. The Environment Act 1995 places a duty on local authorities to review, and report annually on, air quality in their area. Air Quality Management Areas (AQMA) must be declared where national air quality objectives are unlikely to be achieved, and an Action Plan prepared to improve air quality in the AQMA. There are currently 22 AQMAs in the PfSH area.

6.84. When preparing local plans, PfSH authorities will need to consider impacts on health caused by poor air quality through the sustainability appraisal process. Impacts on the natural environment (designated sites) need to be considered through the Habitat Regulations Assessment process. Development should be located so as to minimise adding to air quality problems and regard should be had to designated AQMAs when determining strategic approaches to development.

Managing Flood risk

6.85. The PfSH sub-region contains around 190 km of coastline, and many parts of the PfSH area are at risk of flooding from the sea, rivers and watercourses. The rivers Avon, Avon Water, Test, Itchen, Hamble, Meon, Alver, Wallington, Lavant and Hermitage Stream all pass through existing developed areas. PfSH will be publishing its updated Strategic Flood Risk Assessment (SFRA) on the PfSH website soon after publication of this Spatial Position Statement.

6.86. The [North Solent Shoreline Management Plan](#) (SMP13, 2010) sets out a framework for the sustainable future management of the coastline for most²⁹ of the PfSH area, through coastal defence or managed realignment. Predicted sea-level rise over the coming century would exceed the existing level of protection provided by some of the sub-region's current flood defences, making a significant number of communities more vulnerable to coastal flooding and erosion. The sub-region's most populated areas are on low lying coastlines, including parts of Portsmouth, Southampton, Gosport, Fareham, Eastleigh, Hayling Island and coastal towns in the New Forest. Some of these areas at risk of flooding, notably within the two cities and Gosport, are also a focus for strategic development and need further funding to secure investment in strategic flood risk measures. SMPs inform the ongoing preparation of Flood and Coastal Erosion Risk Management Strategies, which will identify and broadly cost the works needed to manage the risks of coastal flooding and erosion over the next century.

6.87. Increased peak rainfall and more frequent storm events are predicted to increase the extent of areas affected by fluvial flood risk and its potential severity.

²⁹ West of Hurst Spit in the New Forest falls under [Poole and Christchurch Bays](#) (SMP15, 2010).

With extensive areas of porous chalk geology parts of southern Hampshire can be affected by groundwater flooding when the water table is sufficiently high. Flooding from natural sources can be compounded by drain or sewer inundation, especially in areas with older sewer systems where surface runoff may not be drained separately to foul wastewater, or where sewers are permeable to ground water.

SPS9: STRATEGIC PRINCIPLES FOR AVOIDING AND MITIGATING ENVIRONMENTAL RISKS AND IMPACTS

The PfSH authorities will protect and enhance the natural environment and manage flood risk in accordance with the Habitats, Water Environment and Air Quality Regulations and the National Planning Policy Framework. This will include addressing key South Hampshire wide issues with the following types of avoidance and mitigation measures:

1. Locating development to avoid significant flood and air quality risks where possible, consistent with the overall approach of 'cities/towns/urban areas first'.
2. Locating development to avoid adverse impacts on important species and habitats, where possible.
3. Specifying development standards to minimise, to the extent practicable, flood, water quality and air quality risks and adverse impacts on important species and habitats.
4. Managing and mitigating the impacts of increased visitor pressure on designated sites in the Solent (through Bird Aware) and in the New Forest National Park, having regard to their respective visitor impact catchments.
5. Enabling the delivery of additional nutrient mitigation projects.
6. Managing water demand to reduce the need for sustainable water supply and wastewater management infrastructure.
7. Enabling the delivery of strategic flood defences and catchment-based flood management solutions including opportunities for natural flood management and the requirement for sustainable drainage systems.

SPS10: SUPPORTING NATURE RECOVERY AND BIODIVERSITY NET GAIN (BNG)

The PfSH authorities will work together and in partnership with others to support the identification of nature recovery priorities for the PfSH area and the preparation of the Hampshire LNRS.

Collectively and through local plans PfSH authorities will support the implementation of strategic nature recovery projects and identify opportunities for the provision of BNG to enable development that also help to achieve nature recovery priorities alongside other appropriate public benefits where appropriate.

Green and blue infrastructure (GBI)

6.88. The NPPF (2023) supports the provision of green infrastructure, defined in the appendices as *'a network of multi-functional green and blue spaces and other natural features, urban and rural, which is capable of delivering a wide range of environmental, economic, health and wellbeing benefits for nature, climate, local and wider communities and prosperity'*. The Green Infrastructure Framework (2023) is a Government policy tool to support GBI including urban greening and connections with the surrounding landscape. It promotes equitable access to good quality green or blue spaces within a 15-minute walk.

6.89. GBI provision and enhancement is crucial to enable and complement planned sustainable economic growth and development in the PfSH area, given the wider context of environmental sensitivities and constraints on development. When preparing local plans PfSH authorities should explore opportunities for the provision of strategic and local GBI, prioritising opportunities with multifunctional benefits, such as the provision of BNG, the creation or enhancement of nature recovery networks, protecting valued landscapes and settlement gaps, reducing recreational pressure on the Solent and New Forest designated sites, and (depending on the prior land use) providing nutrient mitigation.

6.90. The South Hampshire Green Infrastructure Strategy (2017) set a vision and framework for the delivery of an integrated and multifunctional network of strategic, landscape-scale GI across the South Hampshire sub-region. The associated South Hampshire Green Infrastructure Implementation Plan (2019) identifies a number of strategic GBI projects and project opportunities, together with smaller scale projects which when grouped together are of strategic GI importance for the sub-region. Strategic GBI opportunities are shown in the diagram below, complementing the existing strategic GBI network, a 'green grid' comprising the following elements:

- The strategic rights of way network
- Long distance footpaths and national cycle routes
- Country Parks
- Large scale Suitable Alternative Natural Green Spaces (SANGs)
- Community Forests
- River and strategic wildlife corridors
- Internationally important habitat areas
- National Nature Reserves (NNR)
- Protected landscapes (National Parks and AONBs).

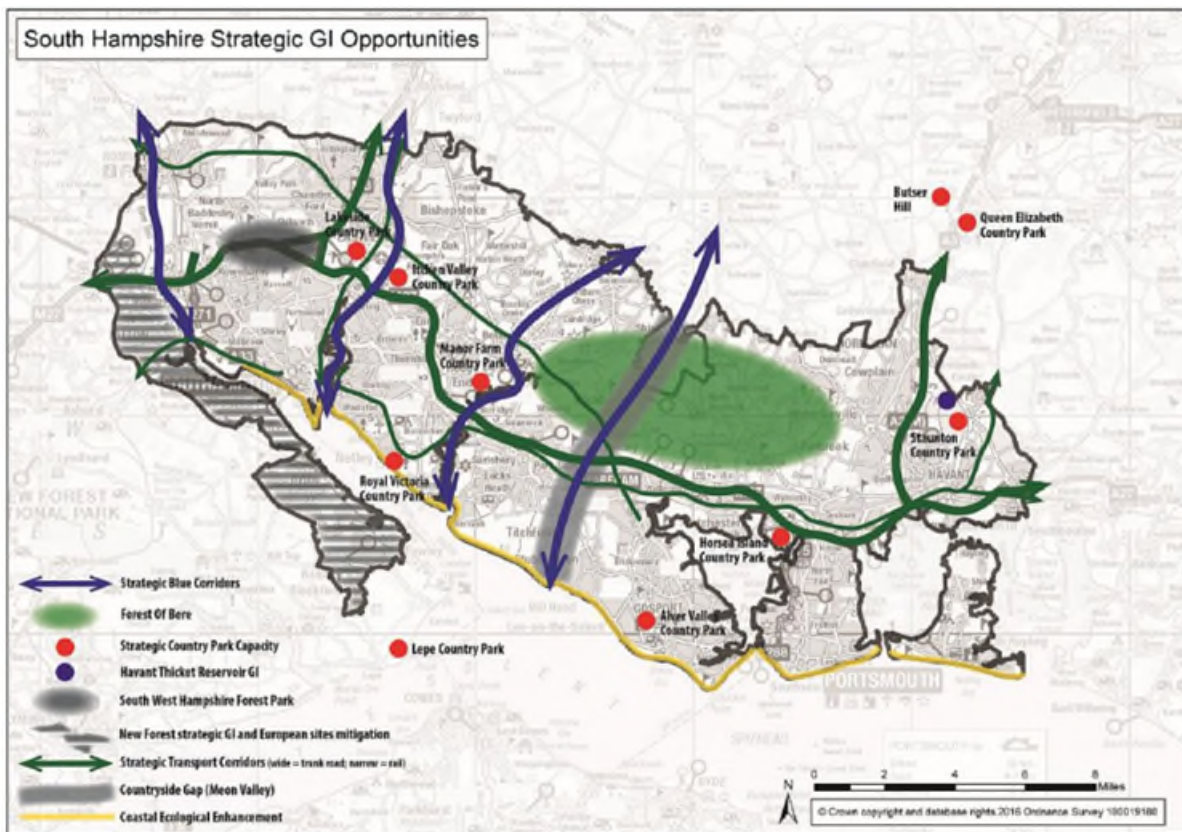


Figure 7: South Hampshire Strategic GI Opportunities

6.91. The PfSH report Part 2: Strategic Green and Blue Infrastructure Opportunities in South Hampshire (LUC 2023) identifies and maps key strategic GBI opportunities capable of delivering one or more of the following five significant ecosystem service benefits for south Hampshire at sub-regional scale. Figure 3.18 of the report, reproduced below, mapped Strategic Opportunity Zones to provide these strategic benefits agreed for the PfSH area:

- improved access to nature
- nature recovery
- nutrient mitigation
- recreational impact mitigation for Habitats sites; and
- natural flood risk management.

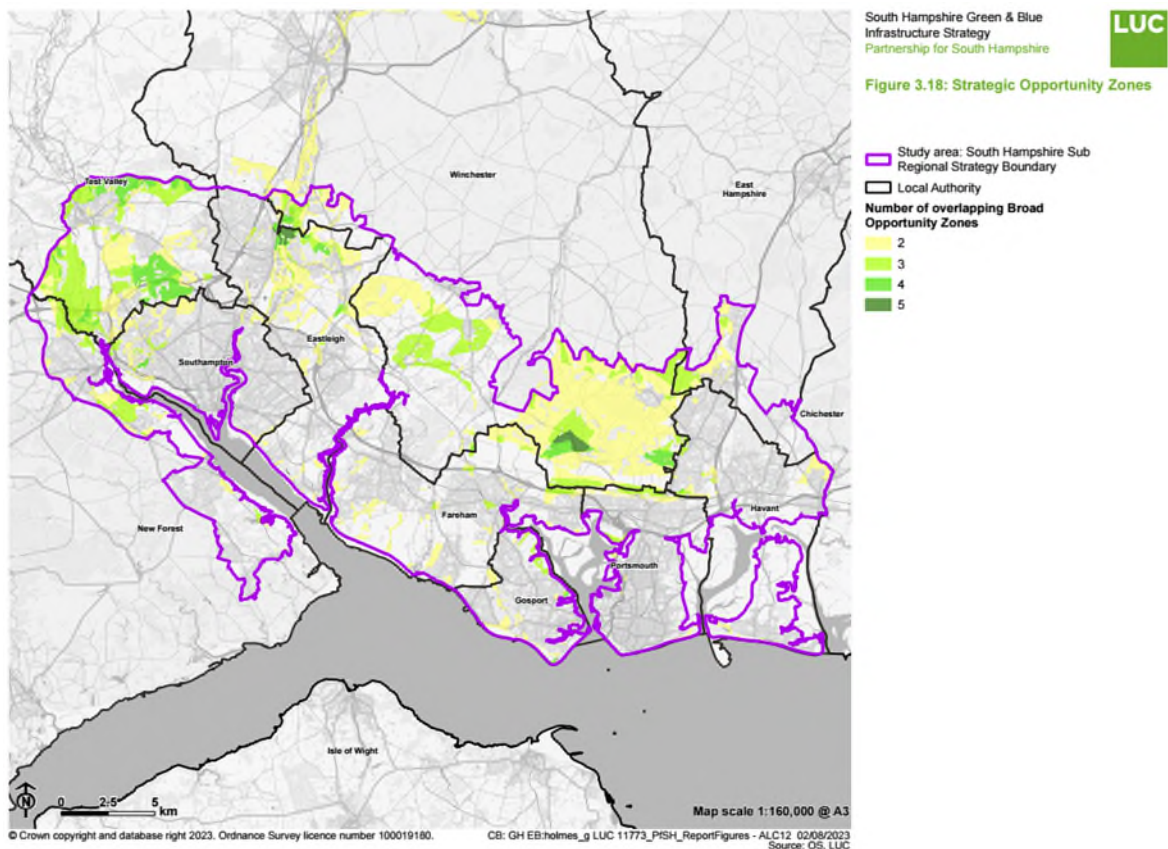


Figure 8: Green and Blue Infrastructure Strategic Opportunity Zones

6.92. The preceding PfSH report Part 1: Green Belt / Green Infrastructure Designation Study (LUC 2023) provides useful advice on potential policy and implementation mechanisms for GBI provision. The Greenprint initiative is developing mechanisms to protect, restore and improve high quality blue and green environments as part of a wider strategy for green recovery in South Hampshire.

SPS11: STRATEGIC PRINCIPLES FOR PROVIDING MULTIFUNCTIONAL GREEN AND BLUE INFRASTRUCTURE

The PfSH authorities and their partners will continue to work together, including through local plans, to plan, provide and manage connected networks of multi-functional green and blue infrastructure, including the strategic GI priorities identified in the PUSH GI Strategy (2017) (and any successor).

These networks should be planned and managed to deliver multifunctional benefits for biodiversity, nature recovery, climate change resilience, public recreation and health and wellbeing.

Types of projects include:

1. Landscape-scale green infrastructure projects (e.g. the Forest of Bere)

2. The provision of new and enhancement of existing strategic recreational facilities (e.g. Regional Park/Country Parks).
3. Projects that will effectively divert recreational pressure away from designated SPA and Ramsar sites on the Solent coast and in the New Forest National Park.
4. The creation and enhancement of a network of green recreational routes (such as pedestrian and cycle) including improved links between urban and rural areas, and to the Country and National Parks.
5. Watercourse and river corridor restoration and enhancement.
6. Coastal/seafront enhancement.
7. Tree planting and urban greening.

Each of the PfSH authorities should in their local plans and, where appropriate, GBI Strategies:

8. Make provision for strategic and other local GBI proposals taking account of Natural England's Green Infrastructure Framework (2023) and accompanying standards, including where appropriate as an integral part of development proposals.
9. Protect and enhance the integrity, quality, connectivity and multi-functionality of the existing green infrastructure sites and networks.
10. Identify mechanisms to deliver and manage these enhanced and new GBI features and networks.

A new Regional Park

6.93. The PfSH report Part 2: Strategic Green and Blue Infrastructure Opportunities in South Hampshire (LUC 2023) identifies that the scale of growth planned in South Hampshire will exacerbate the climate and biodiversity crises unless clear mitigation measures are put in place. A Regional Park would provide a strategic response, not only in terms of improved land management, habitat connectivity and carbon sequestration but also the provision of enhanced recreation opportunities close to where people live. A Regional Park could take a variety of forms, including one cohesive park or a series of smaller connected parks, which would need further investigation. It could potentially be funded through the 'stacking' of public and private payments for a range of different benefits on different parts of the park.

6.94. A Regional Park could enable a strategic response to the climate and biodiversity crises through a contribution to the Local Nature Recovery Strategy (LNRS) and through the LNRS to provide for biodiversity net gain (BNG). The

LUC report identifies two potential locations for a Regional Park through the application of the Strategic Opportunity Zone: to the North of Southampton or in the Forest of Bere. Further development of the evidence base will be required, including landscape work, to understand where the Regional Park would be most suitable and a delivery mechanism (including land acquisition, governance and funding).

Protecting valued landscapes

- 6.95. The environmental qualities, features and designated sites of the PfSH area are indivisible from and set within its natural landscapes and townscape. The main concentrations of settlement areas in South Hampshire are broadly contained by nationally protected landscapes – the New Forest National Park to the west, parts of the South Downs National Park to the north-east, the Chichester Harbour Area of Outstanding National Beauty to the east – and by the Solent coastline to the south. There is a legal requirement on ‘relevant authorities’ (including LPAs) to consider the impacts of their decisions on the statutory purposes of National Parks and AONBs. This includes the need to consider the impacts of planned development located outside the nationally protected landscapes, but which could have impacts within them.
- 6.96. The principal towns in the more rural western edge of the PfSH area mainly lie between the New Forest National Park, and either the coast or the Cranborne Chase AONB. Much of the area outside these two protected landscapes comprises the South-West Hampshire Green Belt, a designation protecting its open character which, whilst not its primary purpose, also provides strong protection for the landscape from inappropriate development.
- 6.97. There are a number of other existing landscape-related designations³⁰ within the PfSH area³¹, including Registered Parks and Gardens, Open Access Land (Common Land and CRoW Act Land), Country Parks, and Nature Conservation designations, and a range of local areas identified in local plans, including important strategic³² gaps.
- 6.98. In a densely populated area, such as South Hampshire, protecting and enhancing valued landscapes and countryside is a key part of the strategy to sustainably accommodate future growth. In preparing local plans PfSH authorities should encourage and facilitate development within existing urban areas as a first step, in line with national policy.
- 6.99. Recognising that some greenfield development is likely to be needed in most PfSH authority areas to meet future growth needs, local plans could also consider the case for protecting the most significant areas of local landscape value, particularly where they form a part of a wider, cross boundary area of landscape value. The Hampshire County Integrated Character Assessment – Landscape,

³⁰ The PfSH report Part 1: Green Belt / Green Infrastructure Designation Study (LUC 2023) p57 fig 6.1 maps these designations.

³¹ For example the Area of Special Landscape Quality designation in the adopted Fareham Local Plan 2037.

townscape and seascape assessment for Hampshire (2010) identifies nineteen Landscape Character Areas (LCAs) that are present in the PfSH area. The following LCAs³³ have potentially 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.

Strategic/Settlement gaps

6.100. The South Hampshire landscape includes its townscape and the landscape setting of settlements. Maintaining the character and separate identity of individual settlements is another integral part of the implementation of the Spatial Position Statement.

6.101. Strategic Gaps (also known as Settlement Gaps) should be defined in local plans where necessary to prevent coalescence and to protect the identity and landscape setting of distinct settlements. They are a mechanism which still allows development to come forward in appropriate sustainable locations, by giving communities the confidence to plan positively for growth, whilst ensuring there is room for the necessary complementary uses, such as recreation areas, transport corridors, and environmental mitigation.

6.102. The PfSH report Part 1: Green Belt / Green Infrastructure Designation Study (2022) lists the gaps of sub-regional and local significance that are identified in current local plans. The Meon Valley gap is of particular significance as it demarcates the boundary of the Portsmouth and Southampton Housing Market Areas and other gaps play an important role in their part of the sub-region.

6.103. In addition to these existing gaps, the study also identifies (p65) the main potential areas for additional gap policy designation due to their role in the setting of settlements or separating settlements and the potential policy mechanisms to do so. These are listed below and either refer to existing gaps which have the potential for extension or entirely new gaps. Depending on where future growth

³² The term 'strategic gaps' is also intended to also refer to settlement gaps.

³³ Green Belt / Green Infrastructure Designation Study (2023: p59 fig 6.3). Note this study included New Forest district Waterside area, but not the New Forest National Park area, nor the western and southern parts of New Forest district.

is located, there may be a case for further new gaps to ensure that growth does not cause coalescence with existing settlements. These should be given careful consideration as local plans are reviewed and new development areas are identified.

- The Totton – Marchwood – Holbury – Hythe Blackfield – Fawley gaps.
- The North Baddesley – Chilworth Local gap.
- The Ampfield – Chandlers Ford gap.
- The Eastleigh – Bishopstoke gap.
- The Southampton/West End, Hedge End, Bursledon, Hamble, Netley gap.
- The Horton Heath, Boorley Green, Hedge End, Botley gap.
- The North Whiteley – Botley gap.
- The North Whiteley -- North Welborne gap.
- The Lee-on-the-Solent – Stubbington 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.

SPS12: STRATEGIC PRINCIPLES FOR STRATEGIC/SETTLEMENT GAPS

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

The Meon Valley is identified as a strategic gap of sub-regional strategic significance and should be protected from inappropriate development.

In addition to this area, Councils should identify in their local plans other strategic countryside gaps of sub-regional significance as appropriate; and may also identify local countryside gaps which are of fundamental local importance in their area.

The precise extent of the Meon and other gaps will be defined in local plans.

Given the long-term need for development, the number and extent of gaps should only be that needed to achieve their purpose.

Best and most versatile agricultural land

6.104. The PfSH authorities are concerned that sufficient prominence is given to retaining space for food production. The NPPF (para 174) states that planning policies should recognise the intrinsic character and beauty of the countryside – including the economic and other benefits of the best and most versatile agricultural land.

SPS13: STRATEGIC PRINCIPLES FOR BEST AND MOST VERSATILE AGRICULTURAL LAND

The PfSH authorities should, when allocating land for development in local plans, balance the protection of the best and most versatile agricultural land that falls within agricultural land classifications 1, 2 & 3a with addressing the need for development.

Key Evidence Base Documents

1. [Economic, Employment and Commercial Needs \(including logistics\) Study
Stantec – March 2021](#)
2. Identification of Broad Areas of Search for Growth Assessments
PfSH – December 2023
3. [Part 1: Green Belt/Green Infrastructure Designations Study: Policy Options
Review
LUC – May 2022](#)
4. [Part 2: Strategic Green and Blue Infrastructure Opportunities in South
Hampshire
LUC – July 2023](#)