



## Planning for a South Hampshire Green Belt

September 2019



## Summary

South Hampshire has experienced a substantial amount of development over the last 60 years. It has seen its population grow, the expansion of the cities and larger towns into the countryside and completely new communities established.

The growth up until the early 2000s was managed by the local planning authorities under the umbrella of structure plans prepared by Hampshire County Council and for a short period the South East Regional Plan. However, since 2011 there has been no formal strategic framework to guide decisions on where development should and should not take place.

The absence of such a framework together with the pressure for more development means that the countryside of south Hampshire, which is one of its greatest assets and which helps define the identity of the towns and villages within, it is at risk from unplanned and un-coordinated development.

This paper sets out the planning case for a new Green Belt for south Hampshire as part of a wider strategic vision for Hampshire. The original paper prepared in September 2017 has been updated to take account of a number of important changes. Support for the principle of a Green Belt by local authority leaders was secured at the PFSH Joint Committee at its meeting in December 2018. They agreed that the Green Belt should be included as a key part of the work that will form the statement of common ground. This document is intended to set out those areas where the PFSH local authorities will work together on strategic planning issues.-The new National Planning Policy Framework (NPPF) published in February 2019 continues the Government's support for Green Belts. CPRE Hampshire published its study on the Effectiveness of Settlement Gap Policies in South Hampshire by consultants West Waddy 2019 which concluded that the current planning policies intended to protect the countryside between the cities and towns was not working.



## 1. Introduction

- 1.1 The purpose of the paper is to inform discussion on the merits of establishing a Green Belt in South Hampshire.
- 1.2 The paper sets out how establishing a Green Belt in south Hampshire would meet the tests set out in the National Planning Policy Framework (NPPF) 2019.



## 2. National Context

### National Planning Policy Framework (NPPF)2019

- 2.1 The NPPF sets out the Government’s policy direction on planning which has at its centre contributing to the achievement of sustainable development.
- 2.2 The Government’s position on Green Belts is set out in Chapter 13 Protecting Green Belt Land. It has retained much of the advice of the previous version of the NPPF.
- 2.3 The fundamental aim of Green Belts is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence ref para 133
- 2.4 The NPPF identifies five purposes of Green Belt ref para134:
  - check the unrestricted sprawl of large built-up areas
  - prevent neighbouring towns merging into one another
  - assist in safeguarding the countryside from encroachment
  - preserve the setting and special character of historic towns; and
  - assist in urban regeneration by encouraging the recycling of derelict and other urban land
- 2.5 New Green Belts should only be established in exceptional circumstances e.g. planning for larger scale development such as new settlements or major urban extensions. In proposing a new Green Belt local planning authorities are advised in para 135:
  - Demonstrate why normal planning and development management policies would not be adequate
  - Whether any major changes in circumstances have made the adoption of this exceptional measure necessary
  - Show what the consequences of the proposal would be for sustainable development
  - Demonstrate necessity for the Green Belt and its consistency with local plans for adjoining areas and
  - Show how the Green Belt would meet other objectives of the Framework
- 2.6 Established boundaries in local plans should only be altered in exceptional circumstances and should endure beyond the plan period. ref para 136
- 2.7 When drawing up Green Belt boundaries the need to promote sustainable patterns of development should be taken into account. Strategic policy-making authorities should consider the consequences of channelling development towards urban areas inside the boundary, towards towns and villages within the Green belt or towards locations beyond the outer boundary. ref para 138

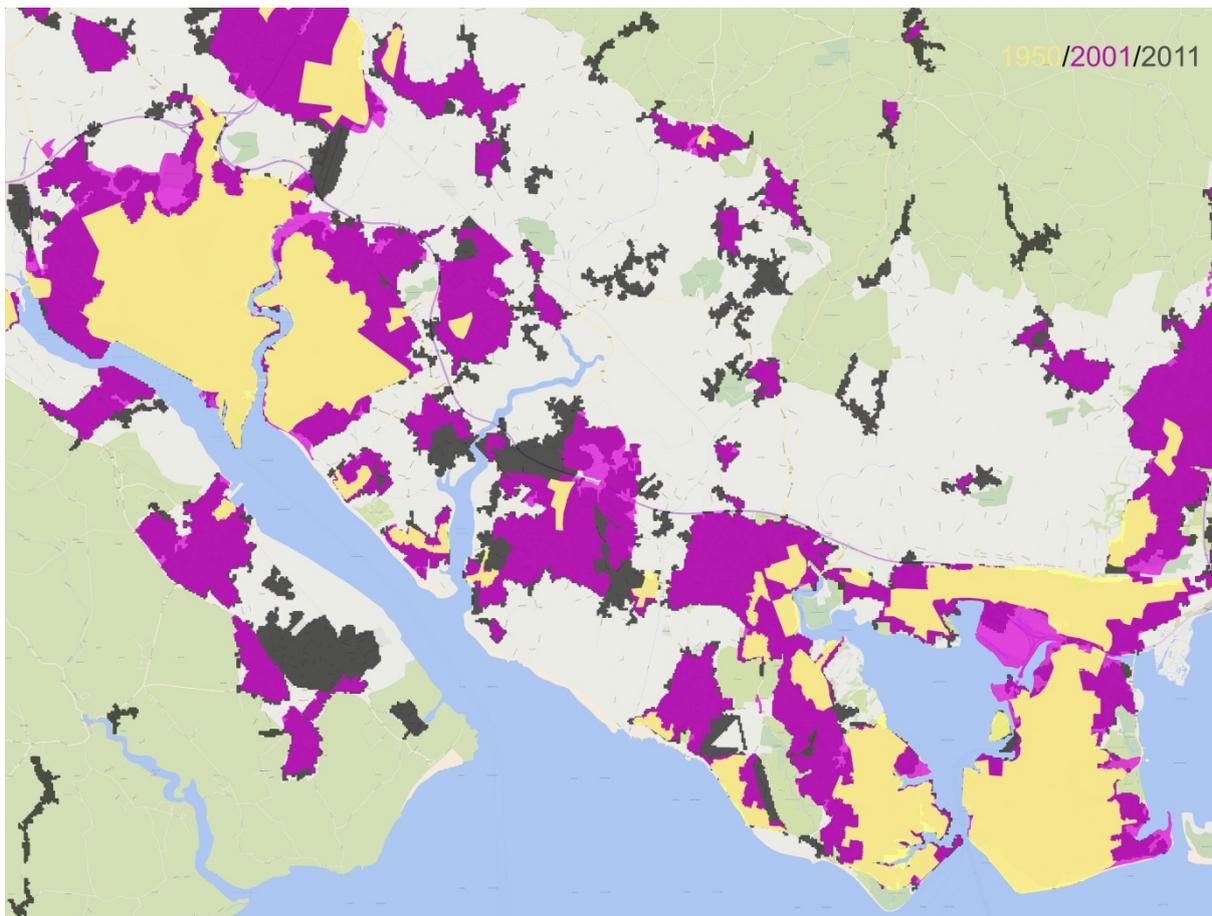


- 2.8 When defining boundaries plans should satisfy six criteria; para 139
- Ensure consistency with the development plan’s strategy for meeting the identified requirements for sustainable
  - Not include land which it is unnecessary to keep permanently open
  - Where necessary identify areas of safeguarded land between the urban area and the Green Belt in order to meet longer-term development needs stretching beyond the plan period
  - Make clear that the safeguarded land is not allocated for development at the present time and permission should only be granted following an update to a plan
  - Demonstrate that the boundaries will not need to be altered at the end of the plan period and
  - Define boundaries clearly using physical features that are readily recognisable and likely to be permanent
- 2.10 Once Green Belts have been defined local planning authorities should plan positively to enhance the beneficial use; such as looking for opportunities to provide access, to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity or to improve damaged and derelict land

### **3. South Hampshire Context**

- 3.1 Development in south Hampshire over the last 60 years been significant with further substantial development proposed see para 4.7 below.
- 3.2 Perhaps of greater significance is the location and scale of development that has taken place. Existing settlements such as Eastleigh, Fareham, Romsey, Totton, and Waterlooville have experienced substantial growth in addition to the development on the edge of Southampton. New communities have been developed including at Valley Park, Chandler’s Ford and Whiteley. The pattern of development and its impact on the area is illustrated on the map below. The areas of countryside between the settlements which plays such an important part in framing their character and identity has been significantly diminished.

### South Hampshire: 1950-2001-2011



- 3.3 To accommodate further development in south Hampshire the local planning authorities are having to consider land in sensitive locations which are likely to have a significant impact on the existing settlement pattern. Fareham is planning for a new community of Welbourne north of the M27 Motorway and Eastleigh Borough Council in its new local plan (2016-2036) is proposing a major new development of over 5,000 homes north of Bishopstoke and north and east of Fair Oak.
- 3.4 The need to maintain a five year supply of housing land has also meant that sites are coming forward in an ad hoc way via often via the appeal process e.g.

development between Havant and Emsworth, between Eastleigh and Southampton, Nursling and Southampton.

## 4. The Planning Case for a Green Belt in South Hampshire

- 4.1 The NPPF is very clear in setting out the approach to the establishment of new Green Belts. It identifies five purposes for Green Belts and five tests to be satisfied for designation in strategic plans. This section of the paper sets out how in the CPRE Hampshire's view that those tests can be met and that the local planning authorities in South Hampshire can support the principle of establishing a Green Belt and develop a detailed programme for defining a boundary.

*why normal planning and development management policies are not adequate*

- 4.2 In South Hampshire the policy approach to protecting the settlement pattern and character of the area over the last 50 years has been based on the designation of strategic gaps (identified in former structure plans) and local gap designations in local plans. The existing planning policies in adopted local plans whilst recognising the importance of maintaining the separation of settlements have not been sufficiently robust to prevent the loss of land located between the towns and cities of South Hampshire resulting in the virtual coalescence of Southampton Eastleigh, and Fareham. The only significant gaps remaining along the M27 corridor are the river valleys of the Itchen and Meon.
- 4.3 In the decision-making process, particularly where there is a shortfall in the supply of housing land, the weight of decision favours the use of land for development. Inspectors at section 78 appeals have granted permission for development on land in designated gaps where there is a shortfall in housing land supply.
- 4.4 To support the CPRE's view of the impact of the current approach by planning authorities and its case for a Green Belt consultants West Waddy were appointed to undertake a study of the effectiveness of the current policy approach applied across South Hampshire.
- 4.5 The consultants reviewed the implementation of the current local plan policies which seek to protect the settlement character and to avoid the coalescence of settlements through the use of designations, primarily local gaps. The review included appeal decisions and decisions of the local planning authorities.



4.6 In a number of cases planning inspectors have dismissed appeals because of the harm to a local gap outweighed the benefit of additional homes. In other decisions inspectors took the contrary view referring to the precedents set by planning authorities who had issued decisions to grant permission on sites located within local gaps in response to the lack of a five year supply of housing. The study also highlighted examples of local authorities allocating sites in emerging local plans on land previously designated as local gaps.

4.7 The study concluded that the current policies which seek to protect the gaps between settlements were failing in their objective to prevent coalescence and sprawl.

4.8 Planning policies which seek to retain settlement character and the setting of settlements such as green gaps, green corridors, local gaps do not carry the same status as a Green Belt designation, i.e. exceptional circumstances do not have to be demonstrated. The designation of a Green Belt would introduce that test.

*major changes in circumstances have made the adoption of this exceptional measure necessary*

4.9 The planning policy context of South Hampshire has changed significantly in recent years the cumulative impact of which is to increase pressure for development on a relatively small geographic area. The combination of various planning designations may well mean that the position in South Hampshire is unique in the United Kingdom.

4.10 On the boundary of south Hampshire are the country's two most recently designated National Parks, the New Forest National Park (2005) and the South Downs National Park (2009). The objectives of the national parks are to conserve and enhance their natural beauty, wildlife and cultural heritage and promote public understanding and enjoyment of their special qualities.

4.11 In respect of meeting the development needs of the communities within the national parks the NPPF recognises the special qualities of national parks and allows the park authorities to make provision for less than their objectively assessed needs for housing. This is likely to increase pressure on areas outside of the parks to meet some of that unmet need. Both the emerging New Forest National Park Local Plan 2018 and South Downs National Park local Plan 2018 are not meeting their objectively assessed needs for housing.

4.12 The pressure for development is significant. Local Authorities in South Hampshire are planning for 104,00 new homes 2011-2034 ref PUSH Spatial Position Statement (2014), a potential population increase of around 250,000 people. The Solent LEP has an ambitious plan to promote greater economic development in South Hampshire. It is looking to create an additional 16,000 jobs (2014-20) with investment in infrastructure to manage the growth.



- 4.13 The South Hampshire coast is at risk from flooding because of rising sea levels and requires major investment in defences to protect coastal communities. In considering the location of future development, this is a significant constraint
- 4.14 The designation of the New Forest as a Special Area of Conservation (SAC) to the west of Southampton and the Solent and Southampton Water Special Protection Area (SPA) that is located in the heart of southern Hampshire together with other international and national designations means that the area is significantly constrained with respect to where development can be located.

*the consequences of the proposal for sustainable development*

- 4.15 A Green Belt would be central to the development of a robust strategy for delivering sustainable development in south Hampshire. The NPPF identifies three elements/objectives of sustainable development

Economic objective

- 4.16 Planning should help build a strong, responsive and competitive economy. A Green Belt would form part of a strategic approach which would provide for new development opportunities. It would support the economic development of South Hampshire by supporting the retention and enhancement one of its key assets, its high quality natural environment and landscape

Social objective

- 4.17 Planning should support strong and vibrant communities by providing homes in a well-designed and safe environment with accessible open spaces that promote their health, social and cultural well-being. A Green Belt would retain areas of countryside close to the towns and cities of South Hampshire providing opportunities for recreation and promoting access to it. It would retain the identity of settlements that are highly valued by residents and support the continued regeneration of existing urban areas.

Environmental objective

- 4.18 Planning should protect and enhance the natural environment to help improve biodiversity and mitigate and adapt to climate change. A Green Belt designation would complement initiatives such as the PUSH Green Infrastructure Strategy and the Hampshire and Isle of Wight Local Nature Partnership's local ecological network.
- 4.19 Current planning policies exercise very little control over the management of land leading to a poor quality of environment. A Green Belt designation would provide a robust and long term framework for developing proposals for a proactive approach

to land management which could enhance the quality of the environment around the towns and cities of South Hampshire for the benefit of residents.

*necessity for the Green Belt and its consistency with the strategic/local plans for adjoining areas*

- 4.20 The case for the Green belt has been outlined in the paragraphs above. Its designation in South Hampshire would be consistent with the planning strategies of the National Parks to the west and east as they seek to manage the impact of development adjoining their boundaries in line with their own emerging plans.
- 4.21 The NPPF identifies three geographic issues in respect of achieving sustainable development.
- 4.22 In drawing up a boundary the consequences of channelling development towards urban areas inside the boundary need to be considered. A Green Belt could act as a positive stimulus to investment in such areas and support the delivery of brownfield sites and the regeneration of existing residential development.
- 4.23 The impact on towns and villages within a defined boundary should also be considered. A Green Belt would first of all maintain a distinction between settlements which is considered important by residents living there. It would also not preclude some additional development to meet local housing needs but would inform decisions as to the most appropriate locations in terms of avoiding coalescence rather than as a result of ad hoc decisions.
- 4.24 The third issue is that the impact on locations beyond the outer boundary, often referred to as leap-frogging. The issue of where development which cannot be accommodated in one area should be placed, is a matter which can be addressed now under the proposed PUSH statement of common ground and the duty to co-operate. The designation of Green Belt does not necessarily introduce a new issue of leap-frogging, as local planning authorities who cannot meet their own housing needs are expected to engage with adjoining authorities to address any shortfall. The issue of authorities in South Hampshire not meeting all of their own housing needs is a live issue. The designation of a Green Belt would inform any discussions on which locations might be appropriate for consideration and those which would not.
- 4.25 In the event that a Green Belt was designated for South Hampshire and there was a need to release land to meet housing needs one would anticipate an assessment based on seeking to achieve sustainable development. In that context rather than identify sites further away from where the need arose which would generate journeys of potentially considerable length a sequential approach would be applied ie to identify sites on the inner boundary adjoining existing development subject to their suitability.



*how the Green Belt would meet the other objectives of the Framework?*

- 4.26 The focus of the NPPF is the delivery of sustainable development. It comprises economic; social and environmental objectives that have been addressed in paragraphs above.

## 5. Practical Considerations

- 5.1 The CPRE recognises that designating a Green Belt in south Hampshire will be challenging in terms of the time and resources required to assess where its boundaries should be and the formal process of designation through the review of the area's local plans.

### Resources

- 5.2 One of the strengths of PUSH is its record of joint working on key planning issues facing the area eg; the spatial strategy prepared to inform the South East Regional Plan in the early 2000s; its work on strategic housing market assessments, strategic flood risk assessments, Green Infrastructure and the recent Integrated Water Management Study.
- 5.3 Making the planning case for a Green Belt would require joint working in terms of both sharing expertise and the resource implications of commissioning any technical studies. It is noted from the agenda of the June 2018 meeting that PUSH is in the fortunate position of having financial reserves it could call upon to fund a study. PFSH would also be able to draw on the work undertaken in the preparation of its revised Green Infrastructure Strategy and appraisal work in support of the review of existing local plans.
- 5.4 A number of Green belts have been reviewed relatively recently e.g. by New Forest District Council, around Oxford and in Lancashire which should mean that there is external expertise available should PFSH decide to progress the principle of a Green Belt and commission detailed work on a boundary.

### Local Plan reviews

- 5.5 The mechanism for designating the boundary of a Green Belt is provided by the review of existing local plans. For South Hampshire the local plans covering the area are at different stages and achieving a co-ordinated approach will not be easy. A way forward might be for PFSH to endorse a boundary for inclusion in the relevant local plans as they come forward to provide the context for the first and subsequent examinations of those local plans. That boundary would need to take



account of the outcome of the examinations of those plans currently at an advanced stage i.e. Eastleigh B.C and Fareham B.C.

- 5.6 A decision by PfSH on whether to progress the designation of a Green Belt at the earliest opportunity and setting in place a programme for defining a boundary would greatly assist those authorities who are starting the review of their local plans i.e. Test Valley B.C. and Winchester C.C.
- 5.7 The designation of a Green Belt will need to undertake in the context of addressing the scale and location of development to support the economy of South Hampshire and meeting the housing needs of the area. CPRE Hampshire recognises the need to make provision for new development in bringing forward a Green Belt
- 5.8 To achieve a Green Belt boundary that performs its intended functions and purposes and has the confidence and support of the public it will be important to ensure that it is robust and can stand the test of time. How land within the Green Belt is managed will also be important. This could be achieved by making the best use of land within the existing built-up areas, identifying and safeguarding green field sites for development in the future and having a positive approach to the use of land within the Green Belt.
- 5.9 CPRE Hampshire consider that the approach to the release of land which has been identified for future development will be critical to the success of the Green Belt and to the use of existing brownfield sites and projects for urban regeneration. Previous experience of safe guarded sites suggests that once ‘earmarked’ for development there is pressure for their release for development.
- 5.10 The NPPF 2018 advises that safeguarded land be identified outside the designated Green Belt, ref paragraph 138c, and that its release should be as an outcome of a review of the plan that proposed its development. It is considered that this approach would still leave such safeguarded site vulnerable to their early development where there was pressure arising from issues of housing land supply.
- 5.11 The CPRE would recommend that an alternative approach be considered where safeguarded land is designated within the Green Belt and is only released following reviews of strategic/local plans. This would enable the more challenging tests for development within the Green Belt set out in the NPPF to be applied.
- 5.12 The proposed approach would also facilitate the formulation of proposals to improve the environmental quality and accessibility of land remaining in the Green Belt in association with the removal of safeguarded sites. The NPPF 2018 envisages an offsetting approach of compensatory improvements, ref paragraph 137, and the proposed approach would be consistent with that advice. The PfSH Green Infrastructure Strategy and the Hampshire and Isle of Wight Local Nature Partnership Local Ecological Network Initiative would provide a good reference point for developing compensatory projects.



## 6. Conclusion

- 6.1 CPRE Hampshire's view, having considered the requirements set out in the current NPPF, is that there is a strong planning justification for the designation of a new Green Belt in South Hampshire and that the practical considerations of delivering it can be addressed.