

NE7 - Settlement gaps

- Support - 32
- Neither support of object - 21
- Object - 34

The changes to the supporting text and the Local Plan policies have not only been informed by the responses to the Regulation 18 consultation but they have also taken on board any additional feedback that has come out of discussions/meetings with statutory consultees and members in order to improve the clarity and understanding of the contents of the Local Plan.

Comments in support of NE7 - settlement gaps		
Respondent number	Comment	Officer comment
ANON-KSAR-NKYQ-M	These settlement gaps are being squeezed and in danger of creating one vast suburban South and Central Hampshire	Support welcomed and comments noted. Recommended Response: No Change
ANON-KSAR-NKS3-G Bishops Waltham Parish Council	NE7 - Comment: Welcome part i, the defined settlement gap of Bishop's Waltham - Swanmore - Waltham Chase - Shedfield - Shirrell Heath	Support welcomed and comments noted. Recommended Response: No Change
A≥NON-KSAR-NKBD-G	We need to ensure there is also a gap between Winchester and Hursley.	The area between Winchester and Hursley is currently protected by countryside policies. There is no evidence that these policies are not working and as such, no evidence has been put forward that there is a need for a gap between Winchester and Hursley. Recommended Response: No Change

<p>ANON-KSAR-NK47-N</p>	<p>I very much support that there is no new allocation of housing required at Texas Field, Port Lane, Pitt Vale and South Winchester Golf Course in this Local Plan.</p> <p>I would like to see the countryside between Olivers Battery, Hursley and Compton better protected however as I believe some of this should be designated as a Valued Landscape.</p> <p>I would also like WCC to reconsider their position on a potential South Hampshire Green Belt. There is much support for this locally and I understand that this would give a higher level of protection with very special circumstances needing to be established before development could be approved.</p> <p>Previously, WCC have allocated a site for development in a settlement gap in the draft Local Plan (Land West of Courtenay Road) which does not inspire confidence.</p>	<p>General support welcomed.</p> <p>The NPPF does not require local authorities to designate 'Valued Landscapes'. The majority of the district is protected 'Countryside' under current Local Plan policies MTRA4 and CP20 of the current local plan Part 1, and Policies DM15 and DM23 of the Local Plan Part 2. If Valued Landscapes were to be applied, it is unclear which part of the above policies would apply to valued landscapes. It is also unclear what additional protection would be given over and above the existing 'Countryside' designation</p> <p>In order for a landscape to be considered 'Valued', the Landscape Institute define this as an 'area having sufficient landscape qualities to elevate it above other everyday landscapes'. The institute has produced a guidance note entitled "Assessing landscape value outside national designations' which includes a range of factors to consider when assessing the value of a landscape.</p> <p>As the NPPF does not define what a 'valued landscape' is and contradictions in case law as to what defines a, 'valued</p>
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		<p>landscape', the Local Plan will not be seeking to designate 'Valued Landscapes'.</p> <p>In practice land already enjoys protection from inappropriate development through the current countryside policies in the adopted Development Plan.</p> <p>Based on the conclusions of the Part 1 report that was undertaken by Land Use Consultants on behalf of the PfSH Local Planning Authorities a new green belt designation is considered to be very unlikely in the current policy context. It is not currently considered that the five tests in the NPPF for new Green Belts could be met, in particular the requirement to demonstrate why normal planning and development management policies would not be adequate, and set out any major changes in circumstances which have made the adoption of this exceptional measure necessary. Therefore, the identification of a proposed new Green Belt is not being progressed.</p> <p>Recommended Response: No Change</p>
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ANON-KSAR-NKZU-S	The existing settlement gap defined in (i) is supported and would allow the village of Shirrell Heath to expand through an allocation at SH26 that would not impact the established gap within the Parish.	Support welcomed and comments noted. Recommended Response: No Change
ANON-KSAR-NK1Z-N Shedfield Parish Council	It would be helpful to provide maps of the settlement gaps	Points noted. The Settlement Gaps will be identified on the Policies Map at the Regulation 19 stage. Recommended Response: No Change
ANON-KSAR-N8EY-N	Whilst supporting the policy I remain concerned about protecting the settlement gap and the countryside between Oliver's Battery and Hursley, some of which fits the criteria of Valued Landscape. I strongly supports WCC that no new allocation of housing is required at Texas Field, Port Lane, Pitt Vale and South Winchester Golf Course in this Local Plan. And why is there no mention of a Green Belt for the area when there is good support for one?	General support welcomed. The NPPF does not require local authorities to designate 'Valued Landscapes'. The majority of the district is protected 'Countryside' under current Local Plan policies MTRA4 and CP20 of the current local plan Part 1, and Policies DM15 and DM23 of the Local Plan Part 2. If Valued Landscapes were to be applied, it is unclear which part of the above policies would apply to valued landscapes. It is also unclear what additional protection would be given over and above the existing 'Countryside' designation In order for a landscape to be considered 'Valued', the Landscape Institute define this as an 'area having sufficient landscape qualities to elevate it above other everyday landscapes'. The institute has produced a guidance note entitled

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		<p>exceptional measure necessary. Therefore, the identification of a proposed new Green Belt is not being progressed.</p> <p>Recommended Response: No Change</p>
ANON-KSAR-NKYT-Q	<p>However I think it might be necessary to be more flexible about settlement gaps between Winchester & Compton Down and Winchester & Kings Worthy</p>	<p>Comments Noted. The Settlement Gaps will be identified on the Policies Map at the Regulation 19 stage. There are existing gaps defined between Winchester and Compton Down / Kings Worthy and sites within these have been taken into account in determining site allocations in the draft Local Plan.</p> <p>Recommended Response: No Change</p>
ANON-KSAR-N8EM-9	<p>Land & Partners supports the protection of a gap between Denmead and Waterlooville to retain their distinct identities and prevent coalescence over the longer term. Denmead has a distinct identity as a village with sensitive edges to the countryside to the south and east. The settlement gap policy will help to protect the relationship of Denmead with its rural setting to the east which separates the village from the suburban edge of Waterlooville. The policy should not and does not prevent appropriate and proportionate expansion of Denmead, as less sensitive land already bounded by roads and development is available to the west of the village.</p>	<p>Comments Noted and support welcomed.</p> <p>Recommended Response: No Change</p>
ANON-KSAR-N8YF-P	<p>Aiming to protect the gaps between the rural villages and the main city should be maintained too, so for instance the gap between Headbourne Worthy and Kings Barton and Kings Barton and the</p>	<p>Comments Noted.</p> <p>Recommended Response: No Change</p>

	main city should be maintained and not allowed become a continuum, from Winchester/Kings Barton/Headbourne Worthy/Kings Worthy	
ANON-KSAR-NK7T-N	Settlement gaps play an important role in protecting the character of individual settlements and also preserving open natural spaces between more developed areas. The retained settlement gap between Denmead and Waterlooville is critical in preventing the coalescence of the two places and inherent loss of character and green open spaces between them. It is noteworthy that the strategic gap between the two settlements is eroded by the allocation of circa 3000 homes West of Waterlooville and with this context, it is difficult to see how any of the SHELAA sites to the south / south east of Denmead could realistically come forward without having further impact on this important buffer. SHELAA sites such as DE30 on the other hand which are located to the north of Denmead within a developed area have no coalescence impact.	<p>Comments noted. The Settlement Gaps will be identified on the Policies Map at the Regulation 19 stage. There is no intention as part of this Local Plan to alter the settlement gap between Denmead and Waterlooville.</p> <p>In regards to the SHELAA sites, these have only assessed at high level and are not allocations. The SHELAA methodology sets out the approach to how sites have been assessed. Denmead PC are in the process of preparing a Neighbourhood Plan and they will identify as part of this process sites to meet their housing allocation.</p> <p>Recommended Response: No Change</p>
ANON-KSAR-N85D-G	I support the policy generally, with the following reservation. Although the Shedfield Village Design Statement attributes high value to the settlement gap between Shedfield and Waltham Chase, I have been unable to find a document that actually identifies the land to which it refers. Settlement gaps should be specifically identified in the Local Plan to remove uncertainty and ambiguity.	<p>Comments Noted and general support welcomed. The Settlement Gaps will be identified on the Policies Map at the Regulation 19 stage.</p> <p>Recommended Response: No Change</p>
ANON-KSAR-N81T-V	A new settlement gap should be created for Sparsholt to avoid it becoming over time an overspill of the city - with a boundary along Salters Lane/Lanham Lane from Sarum Road to Stockbridge	Comments Noted. There are no plans at this moment in time to develop this area of land and in view of this there is no

Sparsholt Parish Council	<p>Road, along Stockbridge road to Woodman Lane, along Woodman Lane back to Sarum Road omitting the area within the Sparsholt settlement boundary. A map of the proposed area will be sent under separate cover.</p> <p>Regard is also required to the importance and means of preserving traditional landscapes from large commercial development or otherwise which are likely to have a negative impact on residential amenity as well as Biodiversity. this is not to oppose diversification of farming, agricultural development or the provision of alternative energy sources but to ensure chosen sites are appropriate from the perspective of all stakeholders. The same applies to consideration for the preservation and protection of existing natural resources such as Crabwood SSSI, West Wood etc</p>	<p>need to define a settlement gap. There is an extensive area of land between the built up areas of Winchester and Sparsholt, which is not subject to significant development pressure, so is not suitable for gap designation.</p> <p>Recommended Response: No change.</p> <p>It is important to read the Local Plan as a whole as there a number of other policies that deal with development in the countryside.</p> <p>Recommended Response: No change.</p>
ANON-KSAR-N856-2	<p>Being right at the southern end of WCC area, I feel strongly that it is very important to consider the potential coalescence of settlements (Knowle, Wickham and Welborne) with those in Fareham Borough. I was pleased to read that, following adoption of the Welborne Plan by Fareham Borough Council in 2015, the boundaries of the gap within Winchester are confirmed with further detail in policy WK3</p> <p>I consider that it is vital to manage the long term retention of these gaps in order to ensure separate settlements and prevent coalescence as well as preserving their unique character.</p>	<p>Comments Noted. This gaps have been confirmed in Fareham BC Adopted Local Plan and will therefore be maintained.</p> <p>Recommended Response: No Change</p>
ANON-KSAR-N8U2-X	<p>We support the approach within Policy NE7 to retain the open and undeveloped nature of defined settlement gaps. However, we consider that Policy NE7 should be amended as follows to ensure</p>	<p>Comments Noted and general support welcomed. It is acknowledged that part of the Sir John Moore Barracks site lies</p>

	<p>that there is no conflict with Policy W2 which proposes significant development within the Littleton Settlement Gap.</p> <p>The Council will support development within defined Settlement Gaps where this accords with Site Allocations within this Plan. Otherwise the local planning authority will retain the generally open and undeveloped nature of the following defined settlement gaps.</p>	<p>within the Winchester – Littleton gap, although the aim will be to maintain some element of separation in the planning of development at the Barracks but this cannot be undertaken until work on the SJM Barracks site has progressed.</p> <p>Recommended Response: No Change</p>
	<p>With regard to Policy NE7, we also consider that the following wording should be added to the supporting text of this policy (which is already contained within the supporting text to Policy W2 (Paragraph 12.20):</p> <p>With regard to Sir John Moore Barracks which is the subject of Policy W2, the site is currently located outside of the settlement boundaries of Littleton and Winchester in an area of countryside and it is not proposed to change the designation of the land at this point. Similar to the approach that the city council took with the Barton Farm Major Development Allocation, the settlement boundary would only be amended once a planning application had been approved to redevelop the site as currently the exact type, distribution and location of the development within the site being allocated has not yet been defined through the master planning process.</p>	<p>Comments Noted. It is important that the Local Plan is read as whole. As a result of this there is no need to include this wording to the supporting text to Policy NE7.</p> <p>Recommended Response: No Change</p>
	<p>OBPC strongly supports the retention of the open and undeveloped nature of the defined settlement gaps, including Oliver’s Battery – Compton gap.</p>	<p>Comments Noted and support for the settlement gap welcomed.</p> <p>Recommended Response: No Change</p>
	<p>However, OBPC remain concerned about protecting this settlement gap and the countryside between Oliver’s Battery and Hursley, some of which fits the criteria of Valued Landscape.</p>	<p>General support welcomed.</p>

	<p>OBPC strongly supports WCC that no new allocation of housing is required at Texas Field, Port Lane, Pitt Vale and South Winchester Golf Course in this Local Plan.</p>	<p>The NPPF does not require local authorities to designate 'Valued Landscapes'. The majority of the district is protected 'Countryside' under current Local Plan policies MTRA4 and CP20 of the current local plan Part 1, and Policies DM15 and DM23 of the Local Plan Part 2. If Valued Landscapes were to be applied, it is unclear which part of the above policies would apply to valued landscapes. It is also unclear what additional protection would be given over and above the existing 'Countryside' designation</p> <p>In order for a landscape to be considered 'Valued', the Landscape Institute define this as an 'area having sufficient landscape qualities to elevate it above other everyday landscapes'. The institute has produced a guidance note entitled "Assessing landscape value outside national designations' which includes a range of factors to consider when assessing the value of a landscape.</p> <p>As the NPPF does not define what a 'valued landscape' is and contradictions in case law as to what defines a, 'valued landscape', the Local Plan will not be</p>
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		<p>seeking to designate 'Valued Landscapes'.</p> <p>In practice land already enjoys protection from inappropriate development through the current countryside policies in the adopted Development Plan.</p> <p>Recommended Response: No Change</p>
<p>BHLF-KSAR-N8T8-3 Olivers Battery Parish Council</p>	<p>The draft Local Plan is silent on the issue of a potential South Hampshire Green Belt. This is surprising given the large scale of public support for such a designation and the work being undertaken by PfSH, which is still considering the merits of such a designation.</p> <p>From the Scrutiny Committee on the 29 September 2022, it would appear from what the Leader of the Council said that it is most unlikely that WCC would support the creation of a Green Belt. That position is based on the view that the countryside is better protected by a range of WCCs other policies.</p> <p>The planning tests for development to take place in a Green Belt are set much higher than for 'standard' Local Plan policies such as settlement gaps, ie very special circumstances need to be established. At the local level, the study commissioned by the CPRE Hampshire clearly demonstrates that policies to protect settlement gaps is not working. Indeed, WCC have allocated a site for development in a settlement gap in the draft Local Plan (Land West of Courtenay Road).</p>	<p>Comments noted. The majority of the district is protected by the Countryside Policy.</p> <p>Based on the conclusions of the Part 1 report that was undertaken by Land Use Consultants on behalf of the PfSH Local Planning Authorities a new green belt designation is considered to be very unlikely in the current policy context. It is not currently considered that the five tests in the NPPF for new Green Belts could be met, in particular the requirement to demonstrate why normal planning and development management policies would not be adequate, and set out any major changes in circumstances which have made the adoption of this exceptional measure necessary. Therefore, the identification of a proposed new Green Belt is not being progressed.</p>

		Recommended Response: No Change
BHLF-KSAR-N8TG-J	<p>In the current absence of a Green Belt, CPRE Hampshire strongly supports the continuation of the Settlement Gaps as set out in Policy NE7. These are essential to preventing coalescence and retaining the separate identity of the affected settlements. They are much valued by the local communities.</p> <p>It seems the existing policy has been carried forward into the consultation Plan without consideration as to whether any new settlement gaps should be designated. Yet new development continues to creep towards and into rural communities and threaten coalescence, especially in the south of the District, and the need for new settlement gaps should be examined.</p> <p>A particular example is the creeping coalescence between the village of Curdrige and creeping extension to the settlements of Whitely and Botley. We consider that a study should now be conducted to establish if a new settlement gap in these locations is justified and added to Policy NE7.</p>	<p>Comments Noted and general support welcomed.</p> <p>Land in between Curdrige and North Whiteley is already currently separated by a railway line, an ancient woodland, SSSI and a historic park and garden. The Council is aware that there have been a number of representations/SHELAA sites that have been put forward for development in the Curdrige/North Whiteley area. At the moment, the emerging Local Plan is not proposing to allocate any of these sites for development so the situation remains unchanged from the existing adopted Local Plan (Part 1). If this situation changes, depending on the site, there may be the need/justification to consider the need for a settlement gap between Curdrige and North Whiteley.</p> <p>Recommended Response: No Change.</p>
BHLF-KSAR-N8BR-B	<p>We support the approach within Policy NE7 to retain the open and undeveloped nature of defined settlement gaps. However, we consider that Policy NE7 should be amended as follows to ensure that there is no conflict with Policy W2 which proposes significant development within the Littleton Settlement Gap.</p>	<p>Comments Noted. It is not considered appropriate to amend the wording to accommodate a conflict with a site specific policy, as Policy NE7 is a general strategic policy. It is acknowledged that</p>

	1.15 The Council will support development within defined Settlement Gaps where this accords with Site Allocations within this Plan. Otherwise the local planning authority will retain the generally open and undeveloped nature of the following defined settlement gaps.	part of the Sir John Moore Barracks site lies within the Winchester – Littleton gap, although the aim will be to maintain some element of separation in the planning of development at the Barracks but this cannot be undertaken until work on the SJM Barracks site has progressed. Recommended Response: No Change
BHLF-KSAR-N8BF-Y	Policy NE7 is supported, noting that settlement gaps have an important role to play in avoiding coalescence and to maintain healthy green/open spaces between built-up areas, but also because the policy includes appropriate flexibility such that proposals can be supported if they are in sustainable locations and would not undermine the overall function of the gap.	Comments Noted and support welcomed. Recommended Response: No Change
BHLF-KSAR-N8BB-U Test Valley Borough Council	We note that the Plan includes strategic provision for local gaps (Policy NE7), in line with 2008 PfSH guidance, to help maintain the integrity, open and visual character of physical gaps between settlements. We are supportive of this approach in principle, which is consistent with our own adopted plan.	Support welcomed and comments noted. Recommended Response: No Change
BHLF-KSAR-N8BY-J	I agree with OBPC who support clauses 7.6 and 7.7 stating the need to protect the countryside from unplanned and large-scale development, recognising the intrinsic character and beauty of the countryside. Valued Landscape should be avoided such as all of the fields adjacent to Texas Drive and the Yew Hill Butterfly Reserve which are of great community value and are well used by walkers, families dog walking, cyclists and horse riders. I also agree with OBPC who strongly supports the retention of the open and undeveloped nature of the defined settlement gaps, including Olivers Battery – Compton gap and think that protecting this	General support welcomed. The NPPF does not require local authorities to designate ‘Valued Landscapes’. The majority of the district is protected ‘Countryside’ under current Local Plan policies MTRA4 and CP20 of the current local plan Part 1, and Policies DM15 and DM23 of the Local Plan Part 2. If Valued Landscapes were to be

	<p>settlement gap and the countryside between Oliver's Battery and Hursley is important some of which fits the criteria of Valued Landscape. The if the fields by Olivers Battery were developed this would lead to almost continual urban tarmacked roads from Winchester through to Southampton waterfront, a terrible thought.</p>	<p>applied, it is unclear which part of the above policies would apply to valued landscapes. It is also unclear what additional protection would be given over and above the existing 'Countryside' designation</p> <p>In order for a landscape to be considered 'Valued', the Landscape Institute define this as an 'area having sufficient landscape qualities to elevate it above other everyday landscapes'. The institute has produced a guidance note entitled "Assessing landscape value outside national designations' which includes a range of factors to consider when assessing the value of a landscape.</p> <p>As the NPPF does not define what a 'valued landscape' is and contradictions in case law as to what defines a, 'valued landscape', the Local Plan will not be seeking to designate 'Valued Landscapes'.</p> <p>In practice land already enjoys protection from inappropriate development through the current countryside policies in the adopted Development Plan.</p> <p>Recommended Response: No Change</p>
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<p>BHLF-KSAR-N8BS-C</p>	<p>BSP fully endorse the protection of character and identity. Gaps between settlements can sometimes be extensive, emphasised by topography, natural features, or agricultural field patterns, whereas some gaps are limited to no more than the width of a small paddock or field. However small these gaps, settlements refuse coalescence by maintaining greenery between them, such as woodland. Once such gap exists between Kings Worthy, Headbourne Worthy and Abbots Worthy. This gap performs a critical role in aiding the retention of local distinctiveness of each village and must not be eroded by development. Any development proposals within Kings Worthy should seek to enhance the level of protect this gap affords and the development opportunity east of Lovedon Lane does this by proposing an extension to the settlement gap, reinforcing its importance. The settlement gap has been considered historically by inspectors examining the adopted Local Plan and it was concluded that the gap between Kings Worth and Abbots Worthy was important. Within the inspectors report into the examination of the Local Plan the report stated that... 'the gap creates the separation required to maintain the distinction. The separation creating a definitive sense of leaving one settlement and having to cross the A33 and a swath of countryside before arrival at the other'. It is essential that there is not breach or infill within this gap.</p>	<p>Comments noted and general support for settlement gaps welcomed. Comments on the site allocations in Kings Worthy, and potential alternative sites, are considered in the sections dealing with the relevant settlement.</p> <p>Recommended Response: No Change</p>
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Comments which neither support nor object to NE7 - settlement gaps		
Respondent number	Comment	Officer comment
ANON-KSAR-NKAK-P	CALA would seek to ensure that there is consistency between the draft site allocation policies and Policy NE7 regarding settlement gaps. In particular, that the recognition within paragraph 12.33 of Policy W4 regarding the lack of contribution that land west of Courtenay Road makes to the Winchester to Kings Worthy / Headbourne Worthy settlement gap is carried through into Policy NE7 and associated amendments to the existing Proposals Map.	<p>Comments Noted. It is not considered appropriate to amend the wording to accommodate a conflict with a site specific policy, as Policy NE7 is a general strategic policy. Policy NE7 already requires that development ‘does not undermine the function of the gap and its intended role to define and retain the separate identity of settlements’.</p> <p>Recommended Response: No Change</p>
ANON-KSAR-NKFV-6	<p>Settlement Gaps : Policy NE7</p> <p>1 I fully support and commend the Council’s conclusion that there should be no housing development at Texas Field,Port Lane,Pitt Vale and South Winchester Golf Course and commend them on its aim of retaining the open and undeveloped nature of the designated settlement gaps including the much loved gap between Olivers Battery and Compton.</p> <p>2 However could I please encourage the Council to think further about greater use of the designation of Valued Landscape which would further strengthen the preservation of such valued areas as the settlement gap between Olivers Battery and Hursley. Moreover, would</p>	<p>General support welcomed.</p> <p>The NPPF does not require local authorities to designate ‘Valued Landscapes’. The majority of the district is protected ‘Countryside’ under current Local Plan policies MTRA4 and CP20 of the current local plan Part 1, and Policies DM15 and DM23 of the Local Plan Part 2. If Valued Landscapes were to be applied, it is unclear which part of the above policies would apply to valued landscapes. It is also unclear what</p>

	<p>the Council also please reconsider its position on a South Hampshire Green Belt which would ensure even greater protection from unwanted development than the existing arrangements.</p>	<p>additional protection would be given over and above the existing 'Countryside' designation</p> <p>In order for a landscape to be considered 'Valued', the Landscape Institute define this as an 'area having sufficient landscape qualities to elevate it above other everyday landscapes'. The institute has produced a guidance note entitled "Assessing landscape value outside national designations' which includes a range of factors to consider when assessing the value of a landscape.</p> <p>As the NPPF does not define what a 'valued landscape' is and contradictions in case law as to what defines a, 'valued landscape', the Local Plan will not be seeking to designate 'Valued Landscapes'.</p> <p>In practice land already enjoys protection from inappropriate development through the current countryside policies in the adopted Development Plan.</p> <p>Recommended Response: No Change</p>
ANON-KSAR-N81Y-1	<p>It would be beneficial if this policy is supported by a map to make clear where these settlement gaps are. Clarification should be included that</p>	<p>Comments noted. The Settlement Gaps will be identified on the Policies Map at the Regulation 19 stage.</p>

	development proposed on site allocations have been accepted in principle as not undermining the function of the settlement gap.	Recommended Response: No Change
ANON-KSAR-N8WC-H	<p>I strongly support the retention of the open and undeveloped nature of the defined settlement gaps, including Oliver’s Battery – Compton gap.</p> <p>I remain concerned about protecting this settlement gap and the countryside between Oliver’s Battery and Hursley, some of which fits the criteria of Valued Landscape.</p> <p>I strongly support WCC that no new allocation of housing is required at Texas Field, Port Lane, Pitt Vale and South Winchester Golf Course in this Local Plan.</p>	<p>General support welcomed.</p> <p>The NPPF does not require local authorities to designate ‘Valued Landscapes’. The majority of the district is protected ‘Countryside’ under current Local Plan policies MTRA4 and CP20 of the current local plan Part 1, and Policies DM15 and DM23 of the Local Plan Part 2. If Valued Landscapes were to be applied, it is unclear which part of the above policies would apply to valued landscapes. It is also unclear what additional protection would be given over and above the existing ‘Countryside’ designation</p> <p>In order for a landscape to be considered ‘Valued’, the Landscape Institute define this as an ‘area having sufficient landscape qualities to elevate it above other everyday landscapes’. The institute has produced a guidance note entitled ‘Assessing landscape value outside national designations’ which includes a range of factors to consider when assessing the value of a landscape.</p>

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<p>ANON-KSAR-NKFQ-1 Upham Parish Council</p>	<p>The policy should surely acknowledge that, as noted on page 140 clause xiii of the plan, The matter of allocating a new greenbelt in the district is being examined by the Partnership for South Hampshire and the outcomes of the research is awaited.</p>	<p>Comments noted.</p> <p>It is important that the Local Plan is read as a whole.</p> <p>Based on the conclusions of the Part 1 report that was undertaken by Land Use Consultants on behalf of the PfSH Local Planning Authorities a new green belt designation is considered to be very unlikely in the current policy context. It is not currently considered that the five tests in the NPPF for new Green Belts could be met, in particular the requirement to demonstrate why normal planning and development management policies would not be adequate, and set out any major changes in circumstances</p>

		<p>which have made the adoption of this exceptional measure necessary. Therefore, the identification of a proposed new Green Belt is not being progressed.</p> <p>Recommended Response: No Change</p>
BHLF-KSAR-N8T1-V	<p>The existing settlement gaps are a legacy consideration and pre-date the NPPF. They must not be rolled forward without any up-to-date review to justify why this policy designation should be retained and the extents robustly defined and up to date.</p>	<p>Comments Noted. The gaps have been defined in the existing Local Plan, which was examined against the provisions of the NPPF in force at the time. The settlement gaps will be published on the Policies Map as part of the Regulation 19 Local Plan.</p> <p>Recommended Response: No Change</p>
BHLF-KSAR-N8TQ-V	<p>I also agree with OBPC who strongly supports the retention of the open and undeveloped nature of the defined settlement gaps, including Oliver's Battery – Compton gap and think that protecting this settlement gap and the countryside between Oliver's Battery and Hursley is important some of which fits the criteria of Valued Landscape.</p> <p>I agree with OBPC which strongly supports WCC that no new allocation of housing is required at Texas Field, Port Lane, Pitt Vale and South Winchester Golf Course in the Local Plan.</p>	<p>Comments Noted. See response to Oliver's Batter Parish Council.</p> <p>Recommended Response: No Change</p>
BHLF-KSAR-N8TB-D	<p>Despite the good words on maintaining open countryside between villages and towns, designation of a Green Belt, the introduction of more Settlement gaps and clear recognition of Valued Landscapes, such as between Oliver's Battery and Hursley, would provide more real assurance that these intentions are real.</p>	<p>General support welcomed.</p> <p>The NPPF does not require local authorities to designate 'Valued Landscapes'. The majority of the district</p>

		<p>is protected 'Countryside' under current Local Plan policies MTRA4 and CP20 of the current local plan Part 1, and Policies DM15 and DM23 of the Local Plan Part 2. If Valued Landscapes were to be applied, it is unclear which part of the above policies would apply to valued landscapes. It is also unclear what additional protection would be given over and above the existing 'Countryside' designation</p> <p>In order for a landscape to be considered 'Valued', the Landscape Institute define this as an 'area having sufficient landscape qualities to elevate it above other everyday landscapes'. The institute has produced a guidance note entitled "Assessing landscape value outside national designations' which includes a range of factors to consider when assessing the value of a landscape.</p> <p>As the NPPF does not define what a 'valued landscape' is and contradictions in case law as to what defines a, 'valued landscape', the Local Plan will not be seeking to designate 'Valued Landscapes'.</p>
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		<p>In practice inappropriate development is protected through the current countryside policies in the adopted Development Plan.</p> <p>Recommended Response: No Change</p>
BHLF-KSAR-N8T2-W	I am very much in agreement with the response of Oliver's Battery Parish Council. I especially agree with their comments regarding Settlement gaps (policy NE7)	<p>Comments Noted. See response to Oliver's Battery Parish Council.</p> <p>Recommended Response: No Change</p>
BHLF-KSAR-N8T5-Z	Having read the response of Oliver's Battery Parish Council I agree with their views. Particularly their comments regarding :- Settlement gaps (policy NE7)	<p>Comments Noted. See response to Oliver's Battery Parish Council.</p> <p>Recommended Response: No Change</p>
BHLF-KSAR-N8R7-Z Colden Common Parish Council	We would like Colden Common to be included in the list of settlement gaps shown within policy NE7, with particular reference to site CC04.	<p>Comments Noted. The settlement gaps will be published on the Policies Map as part of the Regulation 19 Local Plan. There is no justification for the inclusion of settlement gap in relation site CC04, which is a proposed allocation in the draft Local Plan (policy CC3). Comments on the site allocations are considered in the sections dealing with the relevant settlement.</p> <p>Recommended Response: No Change.</p>
BHLF-KSAR-N87J-R Micheldever	This policy needs to mention the gaps between the settlements in the district and those in adjacent ones i.e. the rural individual settlements to the north of the district towards both Andover and Basingstoke. The plan should also highlight that the linear northern villages should not become joined e.g. Micheldever to Micheldever	<p>Comments Noted. The settlement gaps will be published on the Policies Map as part of the Regulation 19 Local Plan.</p>

Parish Council	Station, South Wonston to Sutton Scotney / Wonston, Micheldver to Stoke Charity / Wonston , the villages of the Candover Valley to Alresford or Popham / Dummer to East Stratton / Micheldever Station.	<p>In regards to the linear northern villages, these are generally separated by extensive areas of countryside which are not under significant development pressure. As such, these do not warrant gap designation and it is not the purpose of the settlement gaps policy to list/highlight what linear villages will not become joined.</p> <p>Recommended Response: No change.</p>
BHLF-KSAR-N871-Y	<p>Settlement Gaps</p> <p>4.1 Policy NE7 seeks to retain the generally open and undeveloped nature of defined settlement gaps. The policy lists nine gaps which are defined in accordance with criteria similar to that published in the PfSH Framework. There is no settlement gap review paper within the evidence base and paragraph 7.67 of the draft plan states that any detailed review of the gap boundaries will be undertaken as part of a Neighbourhood Plan.</p> <p>4.2 This approach is considered at odds with the strategy which relies on significant windfall development to meet its housing requirements. As stated in Section 3 of these representations, windfall sites within the settlement boundary are a diminishing resource and without an expansion of a settlement boundary, there will be fewer and fewer suitable sites for windfall development.</p> <p>4.3 In addition, whilst Denmead are proposing a new Neighbourhood Plan, not all settlements are covered meaning that in many cases, a review of the boundary will not take place. It is not clear how in these circumstances, significant windfall development can be accommodated within a fixed boundary. Even where a Neighbourhood</p>	<p>Comments Noted. The gaps are carried forward from the existing Local Plan and have been justified and assessed through previous local plan processes, including the requirement that no more land than is necessary to prevent coalescence should be included. It is not necessary to provide an updated evidence base for an existing policy which is being rolled forward and this is not expected for other carried-forward policies. Nor is a comprehensive review of gaps needed unless there has been a substantial change in circumstances, given that the gaps are well-established and have been tested for soundness through the existing Local Plan process.</p> <p>It is accepted that there will be a need to identify additional development sites in</p>

	<p>Plan is proposed, a robust evidence base to justify the settlement gap is required to inform the Neighbourhood Plan.</p>	<p>Denmead, which will take place through an updated Neighbourhood Plan. It is not for the Local Plan to review the Denmead gap as this is defined in the existing Neighbourhood Plan. In selecting development sites, established gaps should not be impacted if there are suitable alternatives available.</p> <p>The Windfall Study assumes that existing settlement and gap boundaries are retained. Comments on the windfall estimates are dealt with in responding to comments on policy H1.</p> <p>Recommended Response: Amend paragraph 7.67 as follows: ‘Gaps provide a key opportunity to provide green infrastructure around the district, in addition to shaping and maintaining the settlement pattern. They are a valuable tool and the principle of maintaining gaps in these locations is retained’. Any detailed review of the boundaries of these gaps will be undertaken as part of a Neighbourhood Plan, in accordance with the principles contained in the PfSH Policy Framework for Gaps</p>
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<p>BHLF- KSAR- N87Q-Y</p>	<p>Settlement Gaps</p> <p>4.1 Policy NE7 seeks to retain the generally open and undeveloped nature of defined settlement gaps. The policy lists nine gaps which are defined in accordance with criteria similar to that published in the PfSH Framework. There is no settlement gap review paper within the evidence base and paragraph 7.67 of the draft plan states that any detailed review of the gap boundaries will be undertaken as part of a Neighbourhood Plan.</p> <p>4.2 The Draft Local Plan carries forward settlement gaps from previous plans, without up to date evidence to justify their designation. Following the examination of the Eastleigh Local Plan Review 2011-2029, the Inspector, Simon Emerson, noted in his report (11 February 2015) that he saw, “nothing in the Council’s evidence base which seeks to justify on a rigorous and comprehensive basis the need for a gap designation; the choice of location for gaps or the extent of the designated area of any of the gaps identified in the Plan”</p> <p>4.3 The Inspector then went onto say that even if the principle of gaps is accepted, the criteria in Policy 15 of the South Hampshire Strategy would be a good starting point to consider their extent. Policy 15 states that no more land than is necessary to prevent coalescence should be included. Whilst the Draft Local Plan 2011 - 2029 was found unsound, the Council addressed these comments by publishing a Countryside Gaps Background Paper (2018) to support the Draft Eastleigh Borough Local Plan 2016 - 2036. Despite this paper, the Inspector Christina Masters, was not satisfied with the evidence. The Council subsequently went on to publish the Eastleigh Borough Settlement Gaps Study in October 2020 and in her final report, the Inspector concluded that the approach with the updated evidence provides a clear justification for the approach adopted, informed by both a desktop study, fieldwork evaluation and detailed analysis. This demonstrates the scope of work required to justify the inclusion of</p>	<p>Comments noted. The gaps are carried forward from the existing Local Plan and have been justified and assessed through previous local plan processes, including the requirement that no more land than is necessary to prevent coalescence should be included. It is not necessary to provide an updated evidence base for an existing policy which is being rolled forward and this is not expected for other carried-forward policies. Nor is a comprehensive review of gaps needed unless there has been a substantial change in circumstances, given that the gaps are well-established and have been tested for soundness through the existing Local Plan process.</p> <p>It is accepted that there is a need to identify additional development sites in some locations, although established gaps should not be impacted if there are suitable alternatives available. Therefore, SHELAA sites in the gaps have been assessed when considering the allocation of potential development sites, with gap boundaries amended where necessary. These include the site referred to at Bishops Waltham, which was not included as a site allocation and</p>
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<p>settlement gaps.</p> <p>4.4 Although further guidance has since been published by the Partnership for South Hampshire, the principles still apply: to prevent coalescence and to protect the identity of settlements. We therefore object to the inclusion of settlement gaps without a robust, up to date assessment to justify their designation, location and extent.</p> <p>4.5 At Para 6.20 of the Development Strategy and Site Selection Background Paper (November 2022) The Council has commented that, Land adjacent Mill House, Coppice Hill, Bishops Waltham Bargate Homes Ltd</p> <p>“To the east of the B3035, development of site BW11 would entail a reduction of the identified settlement gap with Waltham Chase and extend development on one side of the road beyond the current settlement edge.”</p> <p>4.6 Bargate Homes object to this statement as it is not based on an up to date assessment of the gap and as such, is not evidenced or justified; further demonstrating the need for the evidence base for settlement gaps to be reviewed and where appropriate, amended.</p> <p>4.7 The reliance on out of date evidence to justify a settlement gap is also at odds with the strategy which relies on significant windfall development to meet its housing requirements. As stated in Section 3 of these representations, windfall sites within the settlement boundary are a diminishing resource and without an expansion of a settlement boundary, there will be fewer and fewer suitable sites for windfall development.</p> <p>4.8 In addition, not all settlements are covered by a Neighbourhood Plan meaning that in many cases, a review of the boundary will not take place. It is not clear how in these circumstances, significant windfall development can be accommodated within a fixed boundary. This is exacerbated in centres with a Conservation Area such as Bishops Waltham where suitable sites are further constrained. Again,</p>	<p>did not, therefore, require a change to the settlement gap.</p> <p>However, paragraph 7.67 of the draft Plan should be amended to delete reference to a review of the gaps. The Windfall Study assumes that existing settlement and gap boundaries are retained. Comments on the windfall estimates are dealt with in responding to comments on policy H1.</p> <p>Recommended Response: Amend paragraph 7.67 as follows: Gaps provide a key opportunity to provide green infrastructure around the district, in addition to shaping and maintaining the settlement pattern. They are a valuable tool and the principle of maintaining gaps in these locations is retained. Any detailed review of the boundaries of these gaps will be undertaken as part of a Neighbourhood Plan, in accordance with the principles contained in the PfSH Policy Framework for Gaps</p>
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	<p>this points to a need for site allocations in sustainable locations, facilitated if necessary, by a review of the existing local plan settlement boundary and associated settlement gaps.</p>	
<p>BHLF- KSAR- N87B-G</p>	<p>4.0 Settlement Gaps 4.1 Policy NE7 seeks to retain the generally open and undeveloped nature of defined settlement gaps. The policy lists nine gaps which are carried forward from the current Local Plan. There is no settlement gap review paper within the evidence base and paragraph 7.67 of the draft plan suggests that any detailed review of the gap boundaries will be undertaken at the Neighbourhood Plan level. 4.2 It is pertinent to reflect on the findings of the Inspector of the Eastleigh Local Plan, 2011-2029 where following the examination, the Inspector in his Post Hearing Note 3 – Other Matters to the Council, highlighted some preliminary concerns regarding the settlement gap policy. In particular, he was concerned that he saw: “nothing in the Council’s evidence base which seeks to justify on a rigorous and comprehensive basis the need for a gap designation; the choice of location for gaps or the extent of the designated area of any of the gaps identified in the Plan” 4.3 The Inspector then went onto say that even if the principle of gaps is accepted, the criteria in Policy 15 of the South Hampshire Strategy would be a good starting point to consider their extent. Policy 15 states that no more land than is necessary to prevent coalescence should be included. Although further guidance has since been published by the Partnership for South Hampshire (PfSH), the principles still apply: to prevent coalescence and to protect the identity of settlements. 4.4 In response to these comments Eastleigh Borough Council prepared two additional reports in their evidence base, including a Countryside Gaps Background Paper (June 2018) and subsequent Eastleigh Borough Settlement Gaps Study (October 2020). This work</p>	<p>Comments noted. The gaps are carried forward from the existing Local Plan and have been justified and assessed through previous local plan processes, including the requirement that no more land than is necessary to prevent coalescence should be included. It is not necessary to provide an updated evidence base for an existing policy which is being rolled forward and this is not expected for other carried-forward policies. Nor is a comprehensive review of gaps needed unless there has been a substantial change in circumstances, given that the gaps are well-established and have been tested for soundness through the existing Local Plan process.</p> <p>It is accepted that there is a need to identify additional development sites in some locations, although established gaps should not be impacted if there are suitable alternatives available. Therefore, SHELAA sites in the gaps have been assessed when considering the allocation of potential development sites, with gap boundaries amended where necessary. These include the site</p>

	<p>focused specifically on a detailed assessment of the settlement gaps as proposed, and where appropriate, recommend changes to the boundaries to reflect this updated evidence base. The primary focus of this work was to apply the criteria of the PfSH guidance (i.e. no more than is necessary to prevent coalescence) and to provide a comprehensive evidence base to support proportionate designations. Through examination the Inspector had regard to the evidence base and recommended that boundary adjustments were necessary to reflect the objectives of the gap and in some areas found that gaps should be removed completely in order for the policy to be justified and effective.</p> <p>4.5 We therefore object to the inclusion of settlement gaps without an up-to-date assessment to justify their designation, location and extent.</p> <p>4.6 The reliance on out-of-date evidence to justify a settlement gap is also at odds with the strategy which relies on significant windfall development to meet its housing requirements. As stated in Section 3 of Mayles Farm Macra Ltd these representations, windfall sites within the settlement boundary are a diminishing resource and without an expansion of a settlement boundary, there will be fewer and fewer suitable sites for windfall development.</p> <p>4.7 In addition, not all settlements are covered by a Neighbourhood Plan meaning that in many cases, a review of the boundary will not take place unless this is front loaded through the Local Plan Review. Even where a plan is being prepared, there is no guarantee that it will be adopted and it is not clear how in these circumstances, significant windfall development can be accommodated within a fixed boundary. This is exacerbated in centres with a Conservation Area such as Wickham, where suitable sites are further constrained. Again, this points to a need for site allocations in sustainable locations, facilitated if necessary, by a review of the existing local plan settlement boundary and associated settlement gaps.</p>	<p>referred to at Wickham, which was not included as a site allocation and did not, therefore, require a change to the settlement gap.</p> <p>However, paragraph 7.67 of the draft Plan should be amended to delete reference to a review of the gaps.</p> <p>The Windfall Study assumes that existing settlement and gap boundaries are retained. Comments on the windfall estimates are dealt with in responding to comments on policy H1.</p> <p>Recommended Response: Amend paragraph 7.67 as follows: Gaps provide a key opportunity to provide green infrastructure around the district, in addition to shaping and maintaining the settlement pattern. They are a valuable tool and the principle of maintaining gaps in these locations is retained. Any detailed review of the boundaries of these gaps will be undertaken as part of a Neighbourhood Plan, in accordance with the principles contained in the PfSH Policy Framework for Gaps</p>
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	<p>4.8 Regarding the specific wording of NE7 it is considered that this is unduly onerous in its requirement to reference the “open and undeveloped nature” of the gaps. In this respect it is not considered that the policy is consistent with national or policy or justified. Modification is also necessary to define the settlement gaps more clearly as they appear within Winchester. It is suggested that the policy should be reworded to set a positive criteria-based approach to development within settlement gaps. These changes will ensure that the policy approach, which focuses on the key functions of properly evidenced, and proportionate settlement gaps is justified and effective.</p>	
<p>BHLF- KSAR- N8ZM-X</p>	<p>4.0 Settlement Gaps 4.1 Policy NE7 seeks to retain the generally open and undeveloped nature of defined settlement gaps. The policy lists nine gaps which are defined in accordance with criteria similar to that published in the PfSH Framework. There is no settlement gap review paper within the evidence base and paragraph 7.67 of the draft plan states that any detailed review of the gap boundaries will be undertaken at the Neighbourhood Plan level. 4.2 The draft local plan carries forward settlement gaps from previous plans, without up to date evidence to justify their designation. Following the examination of the Eastleigh Local Plan Review 2011-2029, the Inspector noted that he saw, “nothing in the Council’s evidence base which seeks to justify on a rigorous and comprehensive basis the need for a gap designation; the choice of location for gaps or the extent of the designated area of any of the gaps identified in the Plan” 4.3 The Inspector then went onto say that even if the principle of gaps is accepted, the criteria in Policy 15 of the South Hampshire Strategy would be a good starting point to consider their extent. Policy 15 states that no more land than is necessary to prevent coalescence should be included. Whilst the Draft Local Plan 2011 - 2029 was found</p>	<p>Comments noted. The gaps are carried forward from the existing Local Plan and have been justified and assessed through previous local plan processes, including the requirement that no more land than is necessary to prevent coalescence should be included. It is not necessary to provide an updated evidence base for an existing policy which is being rolled forward and this is not expected for other carried-forward policies. Nor is a comprehensive review of gaps needed unless there has been a substantial change in circumstances, given that the gaps are well-established and have been tested for soundness through the existing Local Plan process.</p> <p>It is accepted that there is a need to identify additional development sites in some locations, although established</p>

	<p>unsound, the Council went on to address these comments by publishing a Countryside Gaps Background Paper (2018) to support the Draft Eastleigh Borough Local Plan 2016 - 2036. Despite this paper, the Inspector Christina Masters, was not satisfied with the evidence. The Council subsequently went on to publish the Eastleigh Borough Settlement Gaps Study in October 2020 and in her final report, the Inspector concluded that the approach within the updated evidence provides a clear justification for the approach adopted, informed by both a desktop study, fieldwork evaluation and detailed analysis. This demonstrates the scope of work required to justify the inclusion of settlement gaps.</p> <p>4.4 Although further guidance has since been published by the Partnership for South Hampshire, the principles still apply: to prevent coalescence and to protect the identity of settlements. We therefore object to the inclusion of settlement gaps without an up to date assessment to support their designation, location and extent.</p> <p>4.5 The reliance on potentially out of date settlement gaps is also at odds with the strategy which relies on significant windfall development to meet its housing requirements. As stated in Section 3 of these representations, windfall sites within the settlement boundary are a diminishing resource and without an expansion of a settlement boundary, there will be fewer and fewer suitable sites for windfall development.</p> <p>4.6 In addition, not all settlements are covered by a Neighbourhood Plan meaning that in many cases, a review of the boundary will not take place. It is not clear how in these circumstances, significant windfall development can be accommodated within a fixed boundary. Again, this points to a need for site allocations in sustainable locations, facilitated if necessary by a review of the existing local plan settlement boundary and the requirement for the gap that affects each settlement.</p>	<p>gaps should not be impacted if there are suitable alternatives available. Therefore, SHELAA sites in the gaps have been assessed when considering the allocation of potential development sites, with gap boundaries amended where necessary.</p> <p>However, paragraph 7.67 of the draft Plan should be amended to delete reference to a review of the gaps.</p> <p>The Windfall Study assumes that existing settlement and gap boundaries are retained. Comments on the windfall estimates are dealt with in responding to comments on policy H1.</p> <p>Recommended Response: Amend paragraph 7.67 as follows: Gaps provide a key opportunity to provide green infrastructure around the district, in addition to shaping and maintaining the settlement pattern. They are a valuable tool and the principle of maintaining gaps in these locations is retained. Any detailed review of the boundaries of these gaps will be undertaken as part of a Neighbourhood Plan, in accordance with the principles</p>
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		contained in the PfSH Policy Framework for Gaps
BHLF-KSAR-N8BV-F Fareham Borough Council	Strategic Gaps Fareham Borough Council has produced an up to date evidence base in relation to Strategic Gaps in the Borough. This work concluded the continued importance of the Meon Gap. The Council is therefore pleased to note that the presence of the gap in Winchester District is maintained through this Plan.	Comments noted and support welcomed. Recommended Response: No Change.
BHLF-KSAR-N86X-5	Policy NE7: Settlement Gaps As highlighted in Section 4.2 of this representation, it would be worthwhile that the Council updates the interactive planning policies map to include the proposed settlement gaps. While it is anticipated that these are remaining the same to those within the adopted development plan, this should be confirmed by appropriate mapping within the emerging Local Plan.	Comments Noted. The settlement gaps will be published on the Policies Map as part of the Regulation 19 Local Plan. Recommended Response: No Change.

Comments which object to NE7 - settlement gaps		
Respondent number	Comment	Officer comment
ANON-KSAR-NKQ5-G Curdridge Parish Council	I support all the gaps defined in this policy, but object to the omission of the Whiteley-Curdridge gap. This is the only place where there is no defence against "Solent City" expanding north to coalesce with rural settlements. There is no evidence that the City Council has evaluated the need for a settlement gap here. SUMMARY	Comments Noted. The support for all the settlement gaps is noted. Land in between Curdridge and North Whiteley is already currently separated by a substantial undeveloped area which includes a railway line, an ancient

	<p>Curdridge Parish Council maintains that using the PfSH/City Council criteria there is sufficient justification for the designation of a settlement gap covering at least some of the land between Curdridge – Botley – Whiteley to provide additional policy protection against coalescence between these settlements:</p> <ol style="list-style-type: none"> 1. There is a real and clear risk of coalescence taking place through speculative development permitted as extensions to the settlements of Whiteley and Botley. Development permitted in and around Curdridge itself is also a possibility. The risk arises from the scale of allocated and planned development in the area and the appetite of landowners to promote development opportunities. 2. Coalescence between these settlements would have an urbanizing effect on undeveloped and open land in a sensitive landscape defined by scattered communities. The City Council has stated clearly that it wishes to avoid such an outcome. 3. Policy SP3 on its own is not necessarily sufficiently robust to provide reassurance that such development can be resisted on appeal. The City Council clearly recognizes this concern in that it considers NE7 a necessary policy at all. 4. Incorporating a settlement gap policy would not prevent development taking place, it would simply add an additional safeguard which requires that development demonstrates that it does not diminish the efficacy of the gap. It is a protection not a prohibition and does not contradict national planning policy. 5. The City Council has accepted the need for a settlement gap to be included between Wickham and Welborne. The Parish Council can 	<p>woodland, SSSI and a historic park and garden. The Council is aware that there have been a number of representations/SHELAA sites that have been put forward for development in the Curdridge/North Whiteley area. At the moment, this Local Plan is not proposing to allocate any of these sites for development so the situation remains unchanged from the existing adopted Local Plan (Part 1). If this situation changes, depending on the site, there may be the need/justification to consider the need for a settlement gap between Curdridge and North Whiteley.</p> <p>Recommended Response: No Change.</p> <p>Comments Noted. This is a comment in relation to Policy SP3 and not relevant to this policy.</p> <p>Recommended Response: No Change</p> <p>Comments Noted. The supporting text and Policy NE7 already clearly sets out role and function of settlement gaps.</p> <p>Recommended Response: No Change.</p>
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	<p>see no difference in principle between the purpose or function of this gap and that between Curdridge – Botley – Whiteley except perhaps than that it is easier for the precise boundaries of that gap to be drawn. That is an issue requiring a solution, not a reason to set aside the problem.</p> <p>6. The City Council has undertaken no updated evaluation of the settlement gap policy or the need for new settlement gaps. It cannot confidently state that designating the gap as requested by the Parish Council is either unnecessary or undeliverable. Without prejudice to these points, the Parish Council also draws attention to its suggestion that policy SP3 could be amended to clarify its role in relation to the status of settlements such as Curdridge.</p>	<p>Comments noted. The gaps are carried forward from the existing Local Plan and have been justified and assessed through previous local plan processes, including the requirement that no more land than is necessary to prevent coalescence should be included. This process did not identify the need for Whiteley – Curdridge gap and the emerging Local Plan does not propose any development that would bring these settlements closer together. As noted above, were such development to be proposed in future the justification for a gap may need to be reviewed.</p> <p>It is not necessary to provide an updated evidence base for an existing policy which is being rolled forward and this is not expected for other carried-forward policies. Nor is a comprehensive review of gaps needed unless there has been a substantial change in circumstances, given that the gaps are well-established and have been tested for soundness through the existing Local Plan process.</p> <p>Recommended Response: No Change.</p>
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<p>ANON-KSAR-NK9S-P</p>	<p>It appears that the existing policy on settlement gaps has been carried forward into the Draft Plan without any consideration as to whether any additional settlement gaps should be included. New development continues to creep out of urban south Hampshire and threaten coalescence. This is the argument for including, for example, the gap between Wickham/Knowle and Wellbourne. What has not been included, however, is a gap between North Whiteley and Curdridge even though the circumstances here are much the same as at Wellbourne. Such a gap is needed to help protect the rural settlement of Curdridge both from Whiteley and from Eastleigh Borough's extensive developments at Botley and Boorley Green. I believe an additional settlement gap in this location is required and should therefore be added to Policy NE7.</p>	<p>Comments noted. The gaps are carried forward from the existing Local Plan and have been justified and assessed through previous local plan processes, including the requirement that no more land than is necessary to prevent coalescence should be included. This process did not identify the need for a Whiteley – Curdridge gap and the emerging Local Plan does not propose any development that would bring these settlements closer together. As noted above, were such development to be proposed in future the justification for a gap may need to be reviewed.</p> <p>It is not necessary to provide an updated evidence base for an existing policy which is being rolled forward and this is not expected for other carried-forward policies. Nor is a comprehensive review of gaps needed unless there has been a</p>

		<p>substantial change in circumstances, given that the gaps are well-established and have been tested for soundness through the existing Local Plan process.</p> <p>Recommended Response: No Change.</p>
<p>ANON-KSAR-NK79-T</p>	<p>Policy NE7 (or NE1 or NE4) should allocated a new Green Belt to protect the remaining open spaces in the southern parishes, in this highly pressured environment. Gaps have historically been eaten away, and consequently have been shown to be weak in terms of preventing coalescence of settlements. A stronger policy is required.</p>	<p>Comments noted. The majority of the district is protected by the Countryside Policy.</p> <p>Based on the conclusions of the Part 1 report that was undertaken by Land Use Consultants on behalf of the PfSH Local Planning Authorities a new green belt designation is considered to be very unlikely in the current policy context. It is not currently considered that the five tests in the NPPF for new Green Belts could be met, in particular the requirement to demonstrate why normal planning and development management policies would not be adequate, and set out any major changes in circumstances which have made the adoption of this exceptional measure necessary. Therefore, the identification of a proposed new Green Belt is not being progressed.</p> <p>Recommended Response: No Change</p>

<p>ANON-KSAR-NKHA-K</p>	<p>P 163: Settlement Gaps</p> <ol style="list-style-type: none"> 1. Settlement gap between Wickham/Knowle and Fareham must be sustained. Local opinion is united on this matter. 2. Grave concern is widespread that with parliamentary boundary changes being planned, the need for the gap is felt even more strongly 3. The potential for children living in Welborne being educated at the Wickham Primary School and patients in Welborne requiring GP services being registered at the Wickham surgery will be a serious issue for residents: traffic issues in the village are extremely severe and increasing them in the south-east corner of the village will be resolutely opposed 	<ol style="list-style-type: none"> 1. Comments Noted on the settlement gap between Wickham/ Knowle. 2. The Council do not control parliamentary boundary changes and this would not have any implications for the Local Authority Boundary or planning policies, as these are different to parliamentary boundaries. 3. Whilst the comments on school spaces and GP services are noted, this is not a matter for consideration for this policy. <p>Recommended Response: No Change</p>
<p>ANON-KSAR-NKHU-7 Oliver's Battery Parish Council</p>	<p>Settlement gaps (Policy NE7)</p> <p>OBPC strongly supports the retention of the open and undeveloped nature of the defined settlement gaps, including Oliver's Battery – Compton gap.</p> <p>However, OBPC remain concerned about protecting this settlement gap and the countryside between Oliver's Battery and Hursley, some of which fits the criteria of Valued Landscape.</p> <p>OBPC strongly supports WCC that no new allocation of housing is required at Texas Field, Port Lane, Pitt Vale and South Winchester Golf Course in this Local Plan.</p> <p>The draft Local Plan is silent on the issue of a potential South Hampshire Green Belt. This is surprising given the large scale of public support for such a designation and the work being undertaken by PfSH, which is still considering the merits of such a designation.</p> <p>From the Scrutiny Committee on the 29 September 2022, it would appear from what the Leader of the Council said that it is most unlikely that WCC would support the creation of a Green Belt. That position is</p>	<p>General support welcomed.</p> <p>The NPPF does not require local authorities to designate 'Valued Landscapes'. The majority of the district is protected 'Countryside' under current Local Plan policies MTRA4 and CP20 of the current local plan Part 1, and Policies DM15 and DM23 of the Local Plan Part 2. If Valued Landscapes were to be applied, it is unclear which part of the above policies would apply to valued landscapes. It is also unclear what additional protection would be given over and above the existing 'Countryside' designation</p>

	<p>based on the view that the countryside is better protected by a range of WCCs other policies.</p> <p>The planning tests for development to take place in a Green Belt are set much higher than for 'standard' Local Plan policies such as settlement gaps, ie very special circumstances need to be established. At the local level, the study commissioned by the CPRE Hampshire clearly demonstrates that policies to protect settlement gaps is not working. Indeed, WCC have allocated a site for development in a settlement gap in the draft Local Plan (Land West of Courtenay Road).</p>	<p>In order for a landscape to be considered 'Valued', the Landscape Institute define this as an 'area having sufficient landscape qualities to elevate it above other everyday landscapes'. The institute has produced a guidance note entitled "Assessing landscape value outside national designations" which includes a range of factors to consider when assessing the value of a landscape.</p> <p>As the NPPF does not define what a 'valued landscape' is and there are contradictions in case law as to what defines a 'valued landscape', the Local Plan will not be seeking to designate 'Valued Landscapes'.</p> <p>In practice land is already protected by current countryside policies in the adopted Development Plan.</p> <p>Based on the conclusions of the Part 1 report that was undertaken by Land Use Consultants on behalf of the PfSH Local Planning Authorities a new green belt designation is considered to be very unlikely in the current policy context. It is not currently considered that the five tests in the NPPF for new Green Belts could be met, in particular the</p>
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		<p>requirement to demonstrate why normal planning and development management policies would not be adequate, and set out any major changes in circumstances which have made the adoption of this exceptional measure necessary. Therefore, the identification of a proposed new Green Belt is not being progressed.</p> <p>Recommended Response: No Change</p>
<p>ANON-KSAR-NK2A-W</p>	<p>Settlement Gaps</p> <p>Policy NE7 seeks to retain the generally open and undeveloped nature of defined settlement gaps. The policy lists nine gaps which are defined in accordance with criteria similar to that published in the PfSH Framework. There is no settlement gap review paper within the evidence base and paragraph 7.67 of the draft plan states that any detailed review of the gap boundaries will be undertaken as part of a Neighbourhood Plan.</p> <p>The draft local plan carries forward settlement gaps from previous plans, without up to date evidence to justify their designation. Following the examination of the Eastleigh Local Plan Review 2011-2029, the Inspector noted that he saw:</p> <p>“nothing in the Council’s evidence base which seeks to justify on a rigorous and comprehensive basis the need for a gap designation; the choice of location for gaps or the extent of the designated area of any of the gaps identified in the Plan”</p>	<p>Comments Noted. The gaps are carried forward from the existing Local Plan and have been justified and assessed through previous local plan processes, including the requirement that no more land than is necessary to prevent coalescence should be included. It is not necessary to provide an updated evidence base for an existing policy which is being rolled forward and this is not expected for other carried-forward policies. Nor is a comprehensive review of gaps needed unless there has been a substantial change in circumstances, given that the gaps are well-established and have been tested for soundness through the existing Local Plan process.</p> <p>It is accepted that there is a need to identify additional development sites in</p>

	<p>The Inspector then went onto say that even if the principle of gaps is accepted, the criteria in Policy 15 of the South Hampshire Strategy would be a good starting point to consider their extent. Policy 15 states that no more land than is necessary to prevent coalescence should be included. Although further guidance has since been published by the Partnership for South Hampshire, the principles still apply: to prevent coalescence and to protect the identity of settlements. We therefore object to the inclusion of settlement gaps without an up to date assessment to justify their designation, location and extent.</p> <p>The reliance on out of date evidence to justify a settlement gap is also at odds with the strategy which relies on significant windfall development to meet its housing requirements. As stated in Section 3 of these representations, windfall sites within the settlement boundary are a diminishing resource and without an expansion of a settlement boundary, there will be fewer and fewer suitable sites for windfall development.</p> <p>In addition, not all settlements are covered by a Neighbourhood Plan meaning that in many cases, a review of the boundary will not take place. Even where a plan is being prepared, there is no guarantee that it will be adopted and it is not clear how in these circumstances, significant windfall development can be accommodated within a fixed boundary.</p> <p>If the Local Plan continues to include Local Gap policies, then a review of the Local Gaps and all settlement boundaries must be undertaken.</p>	<p>some locations, although established gaps should not be impacted if there are suitable alternatives available. Therefore, SHELAA sites in the gaps have been assessed when considering the allocation of potential development sites, with gap boundaries amended where necessary.</p> <p>However, paragraph 7.67 of the draft Plan should be amended to delete reference to a review of the gaps.</p> <p>The Windfall Study assumes that existing settlement and gap boundaries are retained. Comments on the windfall estimates are dealt with in responding to comments on policy H1.</p> <p>Recommended Response: Amend paragraph 7.67 as follows: Gaps provide a key opportunity to provide green infrastructure around the district, in addition to shaping and maintaining the settlement pattern. They are a valuable tool and the principle of maintaining gaps in these locations is retained. Any detailed review of the boundaries of these gaps will be undertaken as part of a Neighbourhood Plan, in accordance with the principles</p>
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		contained in the PfSH Policy Framework for Gaps
ANON-KSAR-NK2H-4	The gap between Oliver's Battery and Compton needs to be protected. The creation of a Green Belt has widespread support and should be considered. Too much of the outskirts of Winchester have already been built over and the existing regulations have not prevented this.	<p>The majority of the district is protected by the Countryside Policy.</p> <p>Based on the conclusions of the Part 1 report that was undertaken by Land Use Consultants on behalf of the PfSH Local Planning Authorities a new green belt designation is considered to be very unlikely in the current policy context. It is not currently considered that the five tests in the NPPF for new Green Belts could be met, in particular the requirement to demonstrate why normal planning and development management policies would not be adequate, and set out any major changes in circumstances which have made the adoption of this exceptional measure necessary. Therefore, the identification of a proposed new Green Belt is not being progressed.</p> <p>Recommended Response: No Change</p>
ANON-KSAR-NKR6-J	1. I feel that there should be a settlement gap between Winchester and Hursley.	Comments Noted. The gaps are carried forward from the existing Local Plan and have been justified and assessed

	<p>2. The settlement gap between Winchester - Compton Street should be protected and no development should be permitted on the old Bushfield Camp site.</p>	<p>through previous local plan processes, including the requirement that no more land than is necessary to prevent coalescence should be included. This process did not identify the need for a Winchester – Hursley gap and the emerging Local Plan does not propose any development that would bring these settlements closer together. Were such development to be proposed in future the justification for a gap may need to be reviewed.</p> <p>Similarly, the Bushfield Camp allocation is carried forward from the existing Local Plan and was found to be acceptable despite its location in the gap.</p> <p>Recommended Response: No Change.</p>
<p>ANON- KSAR- NKDW-5 Littleton and Harestock Parish Council</p>	<p>2. The policy as drafted does not provide the same clear policy framework as that set out in Policy CP18 of the adopted Joint Core Strategy 2013. Policy NE7 wording only seeks to restrict development which does not undermine the function of the gap and its intended role. Policy CP18 is much clearer on the form of development which would not be acceptable: 'Within these areas only development that does not physically or visually diminish the gap will be allowed.' The supporting text of para 9.43 goes further</p> <ul style="list-style-type: none"> • it would not diminish the physical and/or visual separation of settlements; and • it would not individually or cumulatively with other existing or 	<p>Comments Noted. The settlement gaps will be published on the Policies Map as part of the Regulation 19 Local Plan.</p> <p>Policy NE7 in the Reg 18 LP has been worded on purpose differently to Policy CP18 in the adopted Local Plan. This was to take into account Inspector's comments at number of appeal decisions that have involved development in the settlement gap in discussion with the</p>

	<p>proposed development compromise the integrity of the gap.</p> <p>3. Littleton and Harestock Parish Council is concerned that the boundary of the Winchester –Littleton settlement gap is not defined in the Plan but appears to be deferred to the masterplan proposed under Policy W2. It is vital that the designation of settlements gaps, given their importance in the overall spatial strategy, should be fully defined in the Plan and shown on the proposals map. It is not a matter to be delegated to a masterplan prepared by the landowner/developer.</p> <p>Support Policy NE7 and the inclusion of a gap between Winchester and Littleton</p> <p>Object to Policy NE7. The boundary of the Winchester-Littleton settlement gap should be identified on the proposals map of the Plan</p> <p>Object to Policy NE7. The policy should be re-drafted as follows 'Development within settlement gaps would only be allowed if it</p> <ul style="list-style-type: none"> • would not diminish the physical and/or visual separation of settlements; and • would not individually or cumulatively with other existing or proposed development compromise the integrity of the gap. 	<p>Council's landscape team. The key wording in Policy NE7 is 'only development that does not undermine the function of the gap and it intended role to define and retain the separate identity of settlements will be permitted'.</p> <p>As there is currently no masterplan agreed for the SJM Barracks site, for the purposes of this Local Plan, the settlement gap between Littleton and Winchester will not be altered from the adopted Local Plan.</p> <p>Recommended Response: No Change</p>
<p>ANON- KSAR- NKAP-U</p>	<p>I wish to support the retention of the open and undeveloped area of the Compton gap from OB to Compton Down and Hursley. This area of Down land is identical to that which is protected by SDNP.</p> <p>Is is an Asset of Community Value and is close to Brownfield sites which could be better developed if a real need is identified.</p> <p>The Texas Field is the Southern limit of the City AND SHOULD REMAIN SO preserving the Countryside for local access and local use.</p>	<p>Comments Noted and general support welcomed. The settlement gaps will be published on the Policies Map as part of the Regulation 19 Local Plan.</p> <p>Recommended Response: No Change</p>

	This should be spelt out by the Local plan preserving the strategic gap and limiting as it has previously done further housing development.	
ANON-KSAR-NKDP-X	<p>(I don't know how to answer the above question given what I want to say.)</p> <p>I object to the omission of a settlement gap between Winchester/Olivers Battery and Hursley. Royaldown has gone away for the time being but these proposals have a horrible way of coming back time and time again and they only need to win once, however many times they have previously been refused. So there needs to be a clear signal that it is stopped for ever. This is valuable open countryside which helps to delineate Winchester and which provides valuable public footpath and lane access, as well as providing some good areas for nature.</p>	<p>The gaps are carried forward from the existing Local Plan and have been justified and assessed through previous local plan processes, including the requirement that no more land than is necessary to prevent coalescence should be included. This process did not identify the need for a Winchester – Hursley gap and the emerging Local Plan does not propose any development that would bring these settlements closer together. Were such development to be proposed in future the justification for a gap may need to be reviewed.</p> <p>Recommended Response: No Change</p>
ANON-KSAR-N8Y8-8	<p>I strongly support the retention of the open and undeveloped nature of the defined settlement gaps, including Oliver's Battery – Compton gap.</p> <p>I strongly support WCC that no new allocation of housing is required at Texas Field, Port Lane, Pitt Vale and South Winchester Golf Course in this Local Plan.</p> <p>The draft Local Plan doesn't mention a potential South Hampshire Green Belt. This is surprising given the large scale of public support for such a designation and the work being undertaken by PfSH- i understand the merits of such a designation are still being considered.</p>	<p>Comments Noted. Based on the conclusions of the Part 1 report that was undertaken by Land Use Consultants on behalf of the PfSH Local Planning Authorities a new green belt designation is considered to be very unlikely in the current policy context. It is not currently considered that the five tests in the NPPF for new Green Belts could be met, in particular the requirement to demonstrate why normal planning and development management policies would not be</p>

	<p>The Scrutiny Committee on the 29 September 2022, it would appear from what the Leader of the Council said that it is unlikely that WCC would support the creation of a Green Belt. That position is based on the view that the countryside is better protected by a range of WCCs other policies.</p> <p>The planning tests for development to take place in a Green Belt are set much higher than for 'standard' Local Plan policies such as settlement gaps, ie very special circumstances need to be established. At the local level, the study commissioned by the CPRE Hampshire clearly demonstrates that policies to protect settlement gaps is not working. Indeed, WCC have allocated a site for development in a settlement gap in the draft Local Plan (Land West of Courtenay Road).</p>	<p>adequate, and set out any major changes in circumstances which have made the adoption of this exceptional measure necessary. Therefore, the identification of a proposed new Green Belt is not being progressed.</p> <p>Recommended Response: No Change</p>
ANON-KSAR-N8YU-5	<p>I support the retention of the open and undeveloped nature of the defined settlement gaps, including Winchester – Compton Street. However, I am concerned about protecting this settlement gap and the countryside between Oliver’s Battery and Hursley, some of which fits the criteria of Valued Landscape.</p> <p>I strongly support WCC that no new allocation of housing is required at Texas Field, Port Lane, Pitt Vale and South Winchester Golf Course in this LP.</p> <p>The draft LP is silent on the issue of a potential South Hampshire Green Belt. It is surprising that the Leader of the Council publicly stated that the countryside is better protected by a range of WCCs other policies.</p> <p>The planning tests for development to take place in a Green Belt are set much higher than for settlement gaps, etc. Indeed, WCC have allocated a site for development in a settlement gap in the draft 18 LP (Land West of Courtenay Road).</p>	<p>Comments Noted. Based on the conclusions of the Part 1 report that was undertaken by Land Use Consultants on behalf of the PfSH Local Planning Authorities a new green belt designation is considered to be very unlikely in the current policy context. It is not currently considered that the five tests in the NPPF for new Green Belts could be met, in particular the requirement to demonstrate why normal planning and development management policies would not be adequate, and set out any major changes in circumstances which have made the adoption of this exceptional measure necessary. Therefore, the identification of a proposed new Green Belt is not being progressed.</p>

		Recommended Response: No Change
ANON-KSAR-NKN1-9	The land between Olivers Battery and the Winchester Village to Hursley should be specified as a settlement gap. Some of this land meets the definition of Valued Landscape and should be identified as such. The need for the South Hampshire Green Belt for which there is much public support should be included in the Plan.	Comments Noted. See responses above in relation to comments about a new settlement gap, Green Belt and/or valued landscapes. Recommended Response: No Change
ANON-KSAR-N8NY-X	There should be a settlement gap established between Winchester (Oliver's Battery) and Hursley, to help protect the valuable countryside in this area.	Comments Noted. See responses above in relation to comments about a new settlement gap, Green Belt and/or valued landscapes. Recommended Response: No Change
ANON-KSAR-N8GP-E Denmead Parish Council	There is no consideration given to the cumulative effect of individual applications for development. There should be a policy, especially considering Class Q permissions. Settlement gaps should be considered under section (e) of Class Q and considered 'harmful'	Comments Noted. The permitted development rights are set at a national level by Government and cannot be amended by the Council. Class Q allows for the conversion of agricultural buildings to dwellings and involves a 'prior notification' process which allows consideration of only a limited number of factors, which are prescribed by Government. Given this, it is not possible for the Local Plan to add new requirements. Recommended Response: No Change
ANON-KSAR-N85G-K	WDLP Policy NE 7 proposes a comprehensive network of gaps particularly for the villages surrounding Winchester. The gap between Winchester and Twyford is sufficiently protected by the Itchen Valley, St Catherine's Hill and Twyford Down and by the Motorway, but the	Comments Noted. The gaps are carried forward from the existing Local Plan and have been justified and assessed through previous local plan processes,

	<p>gap between Colden Common and Twyford is a typical narrow separation of the two settlements with their own character; both communities see this separation as important to their identities. It is under pressure for development. The TNP includes it as a protected gap by LHE 1, but stops at the Parish/WCC boundary, leaving out the important parts of the gap in Colden Common Parish. The Parish Council asks you to consider the inclusion of a matching policy to LHE1 in consultation with Colden Common Parish Council.</p>	<p>including the requirement that no more land than is necessary to prevent coalescence should be included. This process did not identify the need for a Twyford – Colden Common gap. While the emerging Local Plan does propose a modest housing allocation to the north of Colden Common, the vast majority of the ‘gap’ is already protected through inclusion within the South Downs National Park and policies of the Twyford Neighbourhood Plan.</p> <p>Recommended Response: No Change</p>
<p>ANON- KSAR- NKDM-U Wonston Parish Council</p>	<p>Additional settlement gaps should be considered between: Micheldever/Micheldever Station, Basingstoke/Micheldever Station South Wonston/Sutton Scotney, Sutton Scotney/Micheldever Station Stoke Charity/Micheldever, Stoke Charity/Kings Worthy</p>	<p>Comments Noted. The gaps are carried forward from the existing Local Plan and have been justified and assessed through previous local plan processes, including the requirement that no more land than is necessary to prevent coalescence should be included. This process did not identify the need for additional gaps in the locations suggested. The settlements here are well-separated and very little development is proposed by the emerging Local Plan. Were substantial development to be proposed in future the justification for a gap may need to be reviewed.</p> <p>Recommended Response: No Change</p>

<p>ANON-KSAR-N8XF-N</p> <p>BHLF-KSAR-N87R-2</p>	<p>This objection has three related strands. It seeks the deletion of the Settlement Gap Policy NE7; it requires the Local Plan to address the requirements of paragraph 69 of the National Planning Policy Framework; and it seeks the restoration of the equivalent of the adopted Local Plan Policy MTRA4 of LP1 rather than series of policies in the emerging Local Plan.</p> <p>The case for the deletion of Policy NE7 is set out in this Objection. It is crystal clear that this Policy and the previous Settlement Gap Policies CP18 and SH4 fail all of the tests established in the PUSH Guidance entitled “A Policy Framework for Gaps” published in 2008. This Guidance is still relevant and it is quoted in Policy NE7.</p> <p>The second strand of the Objection concerns the failure of the Local Plan to address Paragraph 69 of the NPPF that requires at least 10% of the housing requirement to be accommodated on sites no larger than one hectare. There is no specific reference to this paragraph. The NPPF paragraph makes clear that the provision of small sites has many benefits. It assists smaller companies who cannot compete with the volume builders. The developments can be completed and delivered more quickly. It provided economic benefits because it enables small building contractors who are unable to obtain work with the larger companies and these builders usually employ local people. The deletion of the Settlement Gap Policy NE1 would create the prospect of releasing small sites that this Policy precludes without any justification.</p> <p>The third strand of the Objection seeks the restoration of a policy equivalent to MTRA4 of the adopted Local Plan. This policy is more than adequate to protect the countryside without the draconian restrictions of the unjustified Gap Policies.</p>	<p>Comments Noted. The supporting text and Policy NE7 sets out the reasons for settlement gaps which will be published on the Policies Map as part of the Regulation 19 Local Plan. The comment does not provide any justification as to why policy NE7 should be deleted. It is important to read the LP as a whole – the Council is relying on a windfall study as part of its housing supply. The windfall sites are historically by their very nature on small sites less than 1 hectare. Table H3 of the Plan (page 232) shows how the requirement for small sites is being met and exceeded. General countryside policy is now provided by policy SP3.</p> <p>Recommended Response: No Change.</p>
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<p>ANON- KSAR- N8Y5-5</p>	<p>Whilst welcoming the majority of NE7, I would like to see the settlement gaps between Olivers Battery and Compton and between Olivers Battery and Hursley added to the list of Local Gaps.</p>	<p>Comments Noted. The gaps are carried forward from the existing Local Plan, including the Winchester – Compton gap, and have been justified and assessed through previous local plan processes, including the requirement that no more land than is necessary to prevent coalescence should be included. This process did not identify the need for a Winchester – Hursley gap and the emerging Local Plan does not propose any development that would bring these settlements closer together. Were such development to be proposed in future the justification for a gap may need to be reviewed.</p> <p>Recommended Response: No Change</p>
<p>ANON- KSAR- N8XZ-9 Denmead Parish Council ANON- KSAR- N8GX-P</p>	<p>There is no consideration given to the cumulative effect of individual applications for development. There should be a policy, especially considering Class Q permissions. Settlement Gaps should be considered under section (e) of Class Q and considered 'harmful'.</p>	<p>Comments Noted. The permitted development rights are set at a national level by Government and cannot be amended by the Council. Class Q allows for the conversion of agricultural buildings to dwellings and involves a 'prior notification' process which allows consideration of only a limited number of factors, which are prescribed by Government. Given this, it is not possible for the Local Plan to add new requirements.</p> <p>Recommended Response: No Change</p>

<p>ANON-KSAR-N81F-E</p>	<p>Bargate Homes acknowledge that gaps between settlements are a tool that can assist in minimising the potential for coalescence between built-up areas, although as noted by draft policy NE7, some development can still take place within gaps without undermining their overall function. However, the starting point for any new gap policy should be a thorough review of the existing gap, to identify whether the land originally designated for this purpose continues to fulfil this function, or whether parts of the gap are no longer required, to ensure that any remaining gap includes no more land than is strictly necessary. As this analysis does not form part of the Council's evidence base, it is impossible to determine whether or not the proposed policy is justified, and ultimately sound.</p>	<p>Comments Noted. The gaps are carried forward from the existing Local Plan and have been justified and assessed through previous local plan processes, including the requirement that no more land than is necessary to prevent coalescence should be included. It is not necessary to provide an updated evidence base for an existing policy which is being rolled forward and this is not expected for other carried-forward policies. Nor is a comprehensive review of gaps needed unless there has been a substantial change in circumstances, given that the gaps are well-established and have been tested for soundness through the existing Local Plan process.</p> <p>It is accepted that there is a need to identify additional development sites in some locations, although established gaps should not be impacted if there are suitable alternatives available. Therefore, SHELAA sites in the gaps have been assessed when considering the allocation of potential development sites, with gap boundaries amended where necessary.</p> <p>Recommended Response: No Change</p>
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ANON-KSAR-N8XP-Y	The present settlement gaps to the west of Winchester need to be preserved and designated as such	<p>Comments Noted. The existing settlement gaps to be maintained have been listed in the policy.</p> <p>Recommended Response: No Change</p>
ANON-KSAR-N83T-X	There needs to be a gap between Hursley and Badger Farm/Oliver's Battery. The proposal for Royal Down needs to be squashed and development prohibited.	<p>Comments Noted. The gaps are carried forward from the existing Local Plan and have been justified and assessed through previous local plan processes, including the requirement that no more land than is necessary to prevent coalescence should be included. This process did not identify the need for a Winchester – Hursley gap and the emerging Local Plan does not propose any development that would bring these settlements closer together. Were such development to be proposed in future the justification for a gap may need to be reviewed.</p> <p>Recommended Response: No Change</p>
ANON-KSAR-N81B-A	Settlement Gaps need further strengthening. Building is planned in settlement gaps in this Plan, (Land West of Courtenay Road), Local study commissioned by CPRE has shown that settlement Gap policies are not working. Why is WCC not picking up on a 'green belt' or some other explicit protection for the open green areas to the South West of Winchester, identified as Valued Landscapes, and listed as high quality landscape character in previous WCC Plans. Thousands of residents supported the notion of a Green Belt for South West Winchester, yet WCC is not at present taking this forward. The view	<p>Comments Noted. The gaps are carried forward from the existing Local Plan and have been justified and assessed through previous local plan processes, including the requirement that no more land than is necessary to prevent coalescence should be included. However, there is a need to identify additional development sites in some</p>

	<p>expressed by the Leader of the Council at the Scrutiny Meeting 29 September 22022, that WCC's landscape protection policies are better than a Green Belt, is difficult to support.</p>	<p>locations, although established gaps should not be impacted if there are suitable alternatives available. Therefore, SHELAA sites in the gaps have been assessed when considering the allocation of potential development sites, with gap boundaries amended where necessary.</p> <p>See responses above to comments regarding Green Belt and valued landscapes.</p> <p>Recommended Response: No Change</p>
<p>ANON-KSAR-N8W6-4</p>	<p>I believe the policy should be amended to include a settlement gap between Winchester and Hurley and another between Winchester and Compton.</p>	<p>Comments Noted. The gaps are carried forward from the existing Local Plan and have been justified and assessed through previous local plan processes, including the requirement that no more land than is necessary to prevent coalescence should be included. This process did not identify the need for a Winchester – Hursley gap and the emerging Local Plan does not propose any development that would bring these settlements closer together. Were such development to be proposed in future the justification for a gap may need to be reviewed.</p> <p>Recommended Response: No Change</p>

<p>ANON- KSAR- N89G-Q</p>	<p>I think that a new settlement gap between Winchester and Pitt should be included. Badger Farm Road forms a natural border to the city and extending the city into Pitt and beyond would harm the character of this area.</p>	<p>Comments Noted. The gaps are carried forward from the existing Local Plan and have been justified and assessed through previous local plan processes, including the requirement that no more land than is necessary to prevent coalescence should be included. This process did not identify the need for a Winchester – Pitt gap and the emerging Local Plan does not propose any development that would bring these settlements closer together. Were such development to be proposed in future the justification for a gap may need to be reviewed.</p> <p>Recommended Response: No Change</p>
<p>ANON- KSAR- NKQN-9</p>	<p>This policy must not prevent the creation of safe, all-weather cycle routes between these settlements. In the past these gaps have been used as an excuse to provide substandard active travel routes that are unusable in poor weather or in the dark and require off-road bikes even in good weather, the prime example being the Meon Valley Trail. The settlements around Winchester itself are especially important in this regard, as they are effectively satellite communities of the city and it's important to encourage low-carbon commuting to work, school or leisure facilities by providing high-quality active routes into Winchester from Littleton, Headbourne Worthy, Kings Worthy, Otterbourne etc.</p> <p>The “Meon Gap” is also a glaring gap in active travel routes around south Hampshire. We suggest a sentence along the lines of:</p>	<p>Comments noted. It is important to read the Local Plan as whole. There are a number of policies in the LP that support active travel. There are no plans or funding as part of the work on the LP to introduce this link.</p> <p>Recommended Response: No Change.</p>

	<p>“High-quality active travel routes suitable for year-round utility journeys will, however, be encouraged across these settlement gaps, to minimise the vehicle traffic on the linking roads. See the Winchester District LCWIP for indications of these routes.”</p>	
BHLF-KSAR-N87R-Z	<p>The Objection seeks the restoration of a policy equivalent to MTRA4 of the adopted Local Plan. This policy is more than adequate to protect the countryside without the draconian restrictions of the unjustified Gap Policies. This change will be explained in detail in Section 4; paragraph 15.1 – 15.3.</p>	<p>Comments Noted. We have reviewed all of the existing adopted LP policies and consider that there is still a need for this policy.</p> <p>Recommended Response: No Change</p>
BHLF-KSAR-N87R-Z	<p>2.1 In 2003 the Council created 8 Strategic Gaps. The Whiteley to Fareham Gap was extended in 2016 under a new Policy SH4. Policy NE.7 proposes the retention of the eight gaps but another Gap Knowle - Wickham – Welborne has been created so there are now nine separate gaps. Not one of these gaps satisfy the criteria in the PUSH Guidance. This Objection will examine all of the Gaps. It is necessary in the first instance to analyse the evolution of the Gap Policies.</p> <p>The Evolution of the Gap Policies</p> <p>2.2 The policies of the County Structure Plan were considered at an Examination in Public in the 1990’s. The Inspectors examined the policies with particular reference to South Hampshire and their “recommendations” should have been applied to all of the Districts. This Report is concerned with the response of Winchester City Council to the Inspectors “recommendations”. I have set out the chronology in the following sections.</p> <p>Hampshire County Structure Plan: Examination in Public Report of the Panel 1993</p> <p>2.3 Panel reviewing the Structure Plan prepared two reports on the policies for the County. The Report of the EiP Panel in January 1993 raised many significant concerns in respect of Strategic Gaps in south</p>	<p>The comments on the previous history of the gaps are all noted. The Council would however note that the inspector found the previous Local Plan sound and therefore considered the previous settlement gaps policy to be sound.</p> <p>Recommended Response: No Change</p>

	<p>Hampshire (1).</p> <p>2.4 Paragraph 3.101 expresses clearly the problems with the policy, it states:-</p> <p>We were particularly concerned by what appeared to us to be a tendency to identify as strategic, gaps which were of purely local, if any, significance, or gaps which were not gaps at all but substantial tracts of land, or gaps simply as a means of preventing development. We were further concerned by the way in which many of these gaps were delineated in Local Plan, frequently tight against existing built up areas. (my italics).</p> <p>2.5 The EiP Inspectors emphasised the fundamental elements of the policy that should be considered in paragraph 3.105:-</p> <p>They must include no more land than is required to prevent coalescence and retain separate identities; it does not mean that every piece of land between the settlements should be left undeveloped. (my italics)</p> <p>2.6 In paragraph 3.110, the Inspectors stated that:-</p> <p>We recommend the following, and no others, as strategic gaps</p> <p>2.7 Fifteen gaps were listed in paragraph 1.115 but you will note that there were no proposals for gaps in Winchester District.</p> <p>Hampshire County Structure Plan Examination in Public (EiP) Report dated 1997</p> <p>2.8 The Inspectors at the EiP into the County Structure Plan prepared a second Report in 1997 (2) made the following comment on the proposed Meon Strategic Gap in paragraph 8.12:-</p> <p>The Meon Valley Gap clearly serves a strategic purpose in separating the major built-up areas in South Hampshire, with Southampton to the west and Fareham and Gosport to the east. But it too is very extensive and takes in some 6km of coastline where the risk of coalescence is virtually nil notwithstanding the other coast and countryside policies in the HCSPR. Winchester City Council suggest that the gap should be</p>	
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	<p>extended northwards beyond the railway and reach up to Wickham. This is a case of extending a gap to find a settlement when the motorway, let alone railway, is an appropriate physical barrier to curtail development.</p> <p>2.9 The advice couldn't have been more emphatic. Draft Winchester Local Plan 2003</p> <p>2.10 The Local Plan was placed on Deposit in May 2003. This was less than five years after the EiP Inspectors' Report had been finalised. The Local Plan proposed "eight gaps". There were many objections. My objection specifically referred to the EiP Inspectors advice (3). Nevertheless, the Inspector who examined the Local Plan made no reference to my objection in his Report nor the EiP recommendations.</p> <p>2.11 All Eight Gaps were endorsed, as follows:-</p> <ul style="list-style-type: none"> i. Bishop's Waltham – Swanmore – Waltham Chase – Shedfield – Shirrell Heath ii. Denmead – Waterlooville iii. Kings Worthy - Abbots Worthy iv. Otterbourne – Southdown v. Winchester – Compton Street vi. Winchester – Kings Worthy/ Headbourne Worthy vii. Winchester – Littleton viii. Whiteley – Fareham/Fareham Western Wards (the 'Meon Gap') <p>Whiteley – Fareham/Fareham Western Wards (the 'Meon Gap')</p> <p>2.11 This Gap demonstrates the fact most emphatically that the Policy is not justified. It will be recalled that the EiP Inspectors had ridiculed Winchester Council's proposals to extend the Meon Gap from Fareham Borough into the Winchester District. Nevertheless, a Strategic Gap policy was introduced.</p> <p>2.12 The Council did not identify any settlement at risk of</p>	
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	<p>coalescence.</p> <p>A new Policy was created CE1: Strategic Gaps</p> <p>2.13 The Winchester Local Plan was adopted in March 2006 with the new Meon Gap. The new Policy CE1 was created and the sub-text states in paragraph 4.6 that:-</p> <p>The Hampshire County Structure Plan (Review) designates Strategic Gaps where areas of open or rural land provide substantial breaks between built-up areas. These areas will be protected from built development and their boundaries will only be altered in exceptional circumstances. Much of the Meon Gap lies within the District, but it is contiguous with land in the adjoining Borough of Fareham. In this District it comprises land between Whiteley to the west and the River Meon to the east.</p> <p>2.14 It can be seen that the sub text didn't identify a settlement at risk of coalescence to the east but it referred only to the River Meon.</p> <p>2.15 Paragraph 4.6 states that:-</p> <p>4.6 The function of a Strategic Gap is to prevent the coalescence of urban areas and protect their separate identities. In defining the extent of the Meon Gap within the District, only the land necessary to achieve these objectives has been included.</p> <p>2.16 The boundaries of the Gap were not only drawn "tight against existing built up areas" but the boundary included land in the Hamble Valley that could not possibly cause coalescence. The boundary selected was Whiteley Lane which lies 12 metres below the ridge that separates the Meon and Hamble Valleys.</p> <p>2.17 The new Policy CE.1 stated that:-</p> <p>Development that would undermine the appearance or functions of the Meon Strategic Gap (as defined on the Proposals and Inset Maps) will not be permitted.</p> <p>2.18 In 2014, I sent a letter to the Head of Strategy, Steve Opacic, quoting the EiP Inspectors' recommendations rejecting the extension</p>	
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	<p>of the Meon Gap into Winchester District (4). I did not receive a reply. Mr Opacic has recently confirmed that he did receive the letter.</p> <p>2.19 Objections to the new Local Plan Policy were rejected by the Local Plan Inspector. He supported Whiteley Lane as the boundary of the Gap but he made no reference to the point I made with regard to the EiP Reports.</p>	
	<p>3.0 THE MEON GAP: SITE IN WHITELEY LANE</p> <p>3.1 The Council ignored the recommendations of the EiP Inspectors and extended the Meon Gap into Winchester District. The Gap was created even though the western boundary was in the Hamble Valley and there was no settlement at risk of coalescence to the east.</p> <p>3.2 A proposal for housing development on land adjoining Lodge Green in Whiteley Lane was included in the new Meon Gap (the site identified on the Composite Plan (5)). It lies in the Hamble Valley and beneath the ridge that separates the two valleys. Whiteley Lane is 8 metres below the ridge.</p> <p>3.3 Policy CE.1 was confirmed in 2006 before the publication of the PUSH Guidance in 2008. Skylark Meadows Estate</p> <p>3.4 The Council granted planning permission for 30 dwellings in 1999. The development was permitted to support the development of a golf course. The development became known as Skylark Meadows. The estate comprises 30 dwellings were laid out in a crescent around golf links. The club house serving the Golf Course lies further north beyond the housing estate. Most of the dwellings are very large and most have been extended (See set of photographs). The entrance to the estate is gated.</p> <p>3.5 The development straddled the ridge that separated the Meon and Hamble Valleys. 19 of the dwellings were in the Hamble Valley and the other 11 dwellings were sited in the Meon Valley. It is obvious that the 30 dwellings on the estate now known as Skylark Meadows was</p>	<p>Comments Noted. The settlement gaps will be published on the Policies Map as part of the Regulation 19 Local Plan. We have reviewed all of the existing adopted LP policies and consider that there is still a need for this policy. The Council does not consider that they deviate from the PUSH guidance; however, even if the policy were to deviate, this is only guidance rather than policy and would not be a justification to delete the policy.</p> <p>Recommended Response: No Change</p>

	<p>clearly not “open or rural”. Besides the conflict with that criteria, there was the fact that the boundary of the Gap (Whiteley Lane) was in the Hamble Valley. Further objections seeking the realignment of the boundary were rejected.</p>	
	<p>4.0 PUSH Guidance published 2008. 4.1 The Partnership for Urban South Hampshire (PUSH) published a document entitled ‘A Policy Framework for Gaps’ in 2008. The document was published to provide a consistent approach to the designations of gaps across the sub-region. In the section headed “Need for Gaps in South Hampshire”, it states, paragraph 2.1 that:- Gaps are spatial planning tools designed to shape the pattern of settlements – they are not countryside protection or landscape designations. 4.2 In the section headed “Criteria for the designation of gaps”, it states, paragraph 2.1 that:- To ensure consistency across South Hampshire and to avoid the proliferation of gaps which could preclude sufficient land being made available for employment and housing development, the following criteria should be used by local planning authorities to select locations for the designation of gaps in South Hampshire. 4.3 The document identified the following criteria that should be used by local planning authorities to select locations for the designation of gaps in South Hampshire:-</p> <ul style="list-style-type: none"> • The open nature/sense of separation between settlements cannot be retained by other policy designations; • The land to be included within the gap performs an important role in defining the settlement character of the area and separating settlements at risk of coalescence; • In defining the extent of the gap, no more land than is necessary to prevent coalescence of settlements should be included having regard to maintaining their physical and visual separation. 	<p>Comments Noted. The settlement gaps will be published on the Policies Map as part of the Regulation 19 Local Plan. We have reviewed all of the existing adopted LP policies and consider that there is still a need for this policy. The Council does not consider that they deviate from the PUSH guidance; however, even if the policy were to deviate, this is only guidance rather than policy and would not be a justification to delete the policy.</p> <p>Recommended Response: No Change</p>

	<p>4.4 The PUSH guidance applied to all of the Districts in south Hampshire.</p> <p>4.5 The guidance makes clear that “no more land than is necessary to prevent coalescence of settlements should be included having regard to maintaining their physical and visual separation.” It is obvious that land in the Hamble Valley should not be included in the Gap.</p>	
<p>BHLF- KSAR- N87T-2</p>	<p>5.0 THE MEON GAP: SITE IN WHITELEY LANE</p> <p>5.1 In 2012, the Council prepared a new Plan. The name Strategic Gaps was changed to Settlement Gaps and Policy CE1 was replaced by Policy CP18.</p> <p>POLICY CP18 – SETTLEMENT GAPS</p> <p>5.2 The three bullet points in the PUSH guidance were incorporated into Policy CP18 in the Local Plan Part 1 adopted in 2013. (Winchester City Council and South Downs National Park Authority Winchester District Local Plan Part 1 - Joint Core Strategy). The sub-text states:-</p> <p>Settlement Gaps</p> <p>9.41 Across the District there are a number of areas of undeveloped land which help to define and retain the separate identity of settlements, an aspect highly valued by many communities, and the concept of gaps is an established spatial planning tool locally. It is also an important element sub-regionally and the Partnership for Urban South Hampshire (PUSH) has specifically produced guidance to ensure a consistent approach is taken across the sub-region in terms of criteria for designation - ‘Policy Framework for Gaps’ PUSH, December 2008 (www.push.gov.uk).</p> <p>9.42 In summary, the PUSH Framework advocates the following criteria for use by local planning authorities to select locations for the designation of gaps:-</p> <ul style="list-style-type: none"> ● the open nature/sense of separation between settlements cannot be 	<p>Comments Noted. The settlement gaps will be published on the Policies Map as part of the Regulation 19 Local Plan. We have reviewed all of the existing adopted LP policies and consider that there is still a need for this policy. The Council does not consider that they deviate from the PUSH guidance; however, even if the policy were to deviate, this is only guidance rather than policy and would not be a justification to delete the policy.</p> <p>Recommended Response: No Change</p>

	<p>retained by other policy designations;</p> <ul style="list-style-type: none"> ● the land to be included within the gap performs an important role in defining the settlement character of the area and separating settlements at risk of coalescence; ● in defining the extent of a gap, no more land than is necessary to prevent the coalescence of settlements should be included having regard to maintaining their physical and visual separation. <p>5.3 Paragraph 9.43 states that:- The Framework states that it will be individual LDFs that will identify the location of gaps and include policies to set out the types of development which will be permitted, based on the following principles :-</p> <ul style="list-style-type: none"> ● it would not diminish the physical and/or visual separation of settlements; and ● it would not individually or cumulatively with other existing or proposed development compromise the integrity of the gap. <p>5.4 The very restrictive Gap Policies have had serious consequences for planning applications and planning appeals across Winchester District. It is probable that many of these would not have been refused or dismissed on appeal if the Gap Policies had not be applied. The following sections describe some of the decisions in the various Gaps.</p> <p>6.0 POLICY SH4 - NORTH FAREHAM SDA</p> <p>6.1 The boundary of Policy CP18 at Whiteley only extended as far as the River Meon. The Council obviously recognised that this was a weakness so Policy SH4 was introduced to extend the Gap from the River Meon eastwards to the boundary of the Welborne SDA which was also the Borough boundary at this point.</p> <p>6.2 Paragraph 9.44 of the Local Plan states that:- In addition to this specific guidance for the sub-region, there is recognition that the scale of development proposed at the Strategic</p>	
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	<p>Development Area at North Fareham requires the inclusion of a gap to prevent coalescence of the SDA with neighbouring settlements of Wickham, Funtley and Knowle. In order to protect the separate identity of these individual settlements, the South East Plan requires areas of open land to be identified and maintained between the SDA and adjoining settlements.</p> <p>6.3 It is difficult to comprehend the relevance of the South East Plan to this case. As a matter of fact, the proposals for the SDA (now Welborne Garden Village) include extensive green buffers around the western periphery. As a consequence, there is no development in the proximity of the SH4 Gap and no prospect of coalescence.</p> <p>6.4 Paragraph 9.45 states that:- The precise extent of this gap will be determined as part of the preparation of an Area Action Plan (for land within Fareham Borough), and Policy SH4 of this Plan establishes the extent of the open land (within Winchester District) to be retained to the north of the Fareham SDA.</p> <p>6.5 It will recalled that Policy CE.1 only extended eastwards as far as the River Meon. Policy CE1 was replaced by Policy CP18. This covered the same area of land. At that time, the Welborne SDA in Fareham Borough had not been confirmed. Subsequently, the area was designated. The new Winchester Local Plan introduced Policy SH4 which extended the Gap from the River Meon to the boundary with the Welborne SDA. The sub-text states:- Policy SH4: To protect the individual character and identity of those settlements adjoining the proposed SDA at North Fareham, an area of open land is identified as a Gap to be maintained between the SDA and Knowle and Wickham. Development which would threaten the open and undeveloped character of this area will be resisted and the land should be managed to secure the long-term retention of its rural</p>	
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	<p>character.</p> <p>Policy SH4 - North Fareham SDA The City Council will cooperate with Fareham Borough Council to help develop a Strategic Development Area of between 6,500 - 7,500 dwellings together with supporting uses, centred immediately to the north of Fareham.</p> <p>Composite plan</p> <p>6.6 I have attached a Composite Plan that shows the extent of the Gap (55). The Council hasn't prepared a plan showing the two gaps so I have joined the two together. Please note the position of the ridge and Skylark Meadows Estate.</p> <p>6.7 It will be appreciated that the areas covered by Policies CP18 and SH4 are vast and comparable in area to the SDA now known as Welborne Garden Village. This project commenced in 2009. It now comprises 1000 acres to provide 6000 dwellings; 20 hectares of employment land with 97,250m² of employment space. A secondary school and three primary schools will be provided together with a district centre and local centres too.</p> <p>6.8 The boundary of SH4 adjoins the original boundary of CE1 and CP18 at the River Meon in the west. It also adjoins the settlement boundary of Wickham Village in the north and the boundary with SDA in the east. Thus, every inch of land is included in the boundary even though the SDA has its own buffer to the Winchester District boundary (as shown on the Composite Plan(3). This clearly contrary to the test in the PUSH guidance. There is no possible risk of coalescence.</p> <p>6.9 It will be appreciated that Winchester Council had now rejected all of the points raised by the EiP Inspectors. They stated that:- Winchester City Council suggest that the gap should be extended northwards beyond the railway and reach up to Wickham. This is a case of extending a gap to find a settlement when the motorway, let</p>	
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	<p>alone railway, is an appropriate physical barrier to curtail development.</p> <p>6.10 The new Policy SH4 extended the Gap boundary to the edge of Wickham village as well as extending beyond the railway and the motorway.</p> <p>Ravenswood</p> <p>6.11 The Gap policy is especially restrictive but it hasn't stopped the Council from allocating 200 dwellings on land north of Knowle Village within both CP18 and SH4. There are two sets of rules. If the Council wants to allocate a site in a Gap it can and if it chooses to reject a small site on the edge of a Gap it can. Local Plan Inspectors in 2005 and 2013 rejected the objection that sought the minor amendment of the boundary of the Gap on land adjoining Lodge Green (as identified on the Composite Plan).</p> <p>6.12 There is another separate point. Although Ravenswood adjoins Knowle Village and it is relatively distant from Wickham Village, it lies within the Wickham Ward and the 200 dwellings have been counted towards the Village housing requirement! The Council claims that the community supported this proposal (please see Page 345; Emerging Local Plan).</p> <p>7.0 LAND IN WHITELEY LANE</p> <p>7.1 The owners of a small site in Whiteley Lane have been seeking development on the site since 1997. The site is approximately 8 metres below the ridge in the Hamble Valley.</p> <p>7.2 The development of the 30 large detached dwellings on Skylark Meadows Estate to the east of the site left it isolated from the countryside. The site lies approximately half way down the Lane and access to the 'open' countryside can only be achieved by moving south along the Lane to its junction with Springles Lane. There are no turning facilities in the Lane and this can to conflict between vehicles seeking to leave and those entering the Lane.</p>	
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	<p>7.3 Several planning applications and appeals were dismissed primarily because of the location within the “Meon Gap” including one scheme in 2006. It took another twelve years to prove that the appeal site didn’t undermine the ‘physical and visual’ appearance of the Meon Strategic Gap (Inspector’s Decision in 2017).</p> <p>7.4 An Inspector’s Decision in respect of a planning appeal in 2017 stated in paragraph 10 that:-</p> <p>The ridgeline and enclosed nature of the appeal site means that it cannot be viewed in the context of the separation of the two settlements. The position of development at Skylark Meadow which is between the settlements has isolated the appeal site in Strategic Gap terms. The site is a very small parcel of land within a large Strategic Gap and it does not assist in the intended role to define and retain the separate identity of settlements. These are characteristics which seem to me to be very particular to the appeal site. As a result of these factors, I CONSIDER THAT SITE NO LONGER PERFORMS A ROLE IN THE VISUAL AND PHYSICAL SEPARATION OF WHITELEY AND FAREHAM AND THE PROPOSAL WOULD NOT THE STRATEGIC GAP. FOR THESE REASONS, I CONCLUDE THAT THE PROPOSAL WOULD NOT BE IN CONFLICT WITH POLICY CP18 OF THE LPP1.</p> <p>7.5 Local residents in the Lane were completely baffled by the Decision as they had relied on the Gap Policy to object to the development.</p> <p>7.6 The Inspector also made a Partial Award of Costs on this point.</p> <p>7.7 Another planning application was submitted in 2019 for the same site. Unbelievably, the Officers recommended refusal for exactly the same reasons as in 2017 and still contrary to GAP Policy CP18. This time the scheme had the support of ten of the eleven households in the Lane. The Inspector in 2021 also confirmed that the site was not in conflict with the Gap Policy and made another Partial Award of Costs.</p>	
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7.8 I have no idea why the Officers ignored the 2017 Decision. I have complained to the Royal Town Planning Institute about the unprofessional and dishonest actions of four Members involved in the case. The Officers' confusion and mistakes are entirely attributable to the creation of the Gap Policy.

8.0 LAND IN LOWER CHASE ROAD, SWANMORE

8.1 Similar objections to the Settlement Gap Policy apply to all of the other Settlement Gaps in the current and emerging Local Plan. Not one Gap satisfy the PUSH criteria. The Council has used the Gap Policy to reject development principally because sites are in Gaps. It will be recalled that the EiP Inspectors in 1993 stated that:-

We were particularly concerned by what appeared to us to be a tendency to identify as strategic, gaps which were of purely local, if any, significance, or gaps which were not gaps at all but substantial tracts of land, or GAPS SIMPLY AS A MEANS OF PREVENTING DEVELOPMENT.

8.2 A planning appeal on land adjoining Alexandra Cottage, Lower Chase Road, Swanmore was dismissed primarily because of its situation in the Swanmore to Bishops Waltham Settlement – Waltham Case Gap (6). The proposed development was for 6 dwellings in the only gap in the Road with continuous frontage development to the north and to the south of the site.

8.3 This Gap comprises the settlements of 'Bishop's Waltham – Swanmore – Waltham Chase – Shedfield – Shirrell Heath'. It also covers a vast area. It is clearly in conflict with the PUSH guidance and the three tests.

8.4 The policy didn't preclude the development of 91 dwellings at Swanmore for David Wilson Homes in the Gap. The emerging Local Plan also allocates land to the west of this site for housing.

BJCPlanning secured the permission for David Wilson Homes. This

	<p>was at the same time that the site adjoining Lodge Green Whiteley Lane for two dwellings was rejected.</p> <p>8.5 A Representation objecting to the inclusion of the site in the Gap was rejected by the Local Plan Inspector.</p> <p>9.0 LAND AT SHAWFORD AND OTTERBOURNE</p> <p>9.1 The land between Otterbourne and Shawford is described as a Gap. The land on the west side of the Road has a very short frontage to the Otterbourne Road.</p> <p>9.2 Another representation was made objecting to the inclusion of the land in a Gap (7). This was also rejected by the Local Plan Inspector (8).</p> <p>9.3 The Gap includes Compton Nursery (George Becketts) which is situated to the south west of the defined settlement of Southdown. The Nursery shares a common boundary with the southern settlement boundary of Southdown. There is a field to the south with a frontage to the Road. There is development to the north and south with the M£ Motorway forming the western boundary.</p> <p>9.4 On the far, eastern, side of Otterbourne Road there is an area of woodland known as Sparrowgrove Copse. This is part of the same Settlement Gap as the Nursery. Sparrowgrove Copse is an area of protected woodland which stretches from the railway line in the east to Otterbourne Road. The woodland has a frontage of 160 metres.</p> <p>9.5 The Council has allocated a site to the south east for development (Gladman Land at Main Road - Local Plan).</p> <p>9.6 This Gap seems to be a political construct as it simply separates the Parishes of Otterbourne and Southdown. It fails the tests in PUSH.</p> <p>10.0 WINCHESTER – KINGS WORTHY/ HEADBOURNE WORTHY</p> <p>10.1 A planning application for the development of two detached dwellings in Headbourne Worthy were refused planning permission recently. The site is identified as “Land at The Alpines, School Lane,</p>	
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	<p>Headbourne Worthy” (9). It is obvious that Gap Policy should not be applied.</p> <p>10.2 This Gap also fails the PUSH tests. The reasons for refusal claim that the site would result in the loss of an important gap between developments. The site has existing development on three sides with just one boundary facing open land. The decision is very questionable but it is still possible that an Inspector would support Policy CP18 as many Inspectors do not question the Gap Policy. The Gap Policy must be dropped (please see Emerging Local Plan: page 354: Otterbourne).</p> <p>11.0 WINCHESTER – LITTLETON GAP</p> <p>11.1 This is another vast area where there is no prospect of coalescence. The abandonment of the Gap Policy would not open the area to development. There are sound landscape reasons that would preclude most development.</p> <p>11.2 The only possible development could be around the fringes of the area. These would not have any impact upon the open area between the two settlements.</p> <p>12.0 WINCHESTER – COMPTON STREET GAP</p> <p>12.1 This is another vast area where there is no prospect of coalescence. The abandonment of the Gap Policy would not open the area to development except if the Council wanted to make another allocation (as Ravenswood) to meet its housing requirement.</p> <p>13.0 THE EMERGING LOCAL PLAN REVIEW (Reg 18) Regulation 18 Consultation Plan November 2022</p> <p>13.1 The emerging Local Plan has been published. The Consultation period commences on 4 November with the deadline for representations is 14 December 2022.</p> <p>13.2 The Section on the Settlement Gaps is set out in the Chapter Biodiversity and the Natural Environment. Policy NE.7 is entitled</p>	
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	<p>'Settlement Gaps' (page 117). The Policy is virtually unchanged from the current Local Plan.</p> <p>All eight gaps are retained but there is one very bizarre addition:</p> <p>13.3 The area of the Gap covered by Policy CP18 becomes a new one sided Gap Whiteley (the 'Meon Gap') and the area of the Gap covered by Policy SH4 is a new separate gap (Knowle, Wickham and Welborne) (please see Pages 465-467; emerging Local Plan). The two gaps have a common boundary – The Railway Line this time rather than the River Meon. Thus, the Council has created back to back Gaps that covers a larger area than Welborne Garden Village (the SDA). The Planning Officers in the Council should have recognised that this was nonsensical. It undermines other decisions in the Plan and confuses the community who assume that the Council is acting with probity.</p> <p>13.4 Whiteley Lane in the Hamble Valley is still the western boundary of the Whiteley to Fareham Gap.</p> <p>13.5 It might be considered that the designation of a Gap stops most if not all development but, as a matter of fact, it achieves very little. Development has been permitted in the Winchester Meon Gap. Several agricultural holdings in Titchfield Lane now have new houses on them. A "run down industrial estate" was replaced by a Community Building (the Wessex Shia Ithna-Asheri-Janet Centre: BJCPlanning obtained the permission). Fareham Borough has permitted a Hotel, and a 78 unit retirement village in the Meon Gap. At this point the Gap is actually narrow and it is a genuine gap unlike the Winchester Meon Gap.</p> <p>13.6 A policy that covers the countryside (such as MTRA4) can achieve the same objectives. The only development that is restricted is some small infilling developments which could possibly be permitted under the countryside policy.</p> <p>13.7 Small infilling is strongly supported by the Government. The</p>	
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	<p>latest guidance in the National Planning Policy Framework requires Councils to provide a minimum of 10% of new development to be provided on sites of less than one hectare for developers of small sites.</p> <p>14.0 NATIONAL PLANNING POLICY FRAMEWORK (SECTION 3)</p> <p>14.1 The National Planning Policy Framework offers considerable support for small development companies. Paragraph 69 of the revised version (2021) states:-</p> <p>Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. To promote the development of a good mix of sites local planning authorities should:</p> <ul style="list-style-type: none"> a) identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved; b) use tools such as area-wide design assessments and Local Development Orders to help bring small and medium sized sites forward; c) support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes; and d) work with developers to encourage the sub-division of large sites where this could help to speed up the delivery of homes. <p>14.2 Many of the sites that have been refused permission and then dismissed on appeal would satisfy this criteria. The site at Whiteley Lane; the site at Chapel Lane, Swanmore and the site at the Alpines all measure less than one hectare and comply with this guidance. The Gaps at Otterbourne and Winchester-Littleton both fail the tests in</p>	
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	<p>PUSH.</p> <p>14.3 The emerging Local Plan makes reference to the NPPF in paragraph 9.23 and in Policy H3 Delivery of Small Housing Sites. The Policy is virtually meaningless because paragraph 9.23 claims that the requirement has already been satisfied and there is no need for further consideration. This is based on past completions. This is a false claim. These completions took place before the NPPF was published in 2021. This decision is a missed opportunity improve the local economy.</p> <p>15.0 POLICY MTRA 4 - DEVELOPMENT IN THE COUNTRYSIDE (SECTION 4)</p> <p>15.1 There has been no need for the Settlement Gap Policy in Winchester District. The EiP Inspectors in 1993 and 1997 recommended that there should be no gaps in Winchester District. It is not clear why the advice was rejected. Perhaps a Freedom of Information enquiry would reveal the reasons.</p> <p>15.2 It is not clear why the Council decided that Policy MRTA4 did not offer sufficient protection to the land covered by the Gap Policies. It is a comprehensive policy that restricts most forms of development. It states that:-</p> <p>In the countryside, defined as land outside the built-up areas of Winchester, Whiteley and Waterlooville and the settlements covered by MTRA 2 and 3 above, the Local Planning Authority will only permit the following types of development:</p> <ul style="list-style-type: none"> ● development which has an operational need for a countryside location, such as for agriculture, horticulture or forestry; or ● proposals for the reuse of existing rural buildings for employment, tourist accommodation, community use or affordable housing (to meet demonstrable local housing needs). Buildings should be of permanent construction and capable of use without major reconstruction; or ● expansion or redevelopment of existing buildings to facilitate the 	
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	<p>expansion on-site of established businesses or to meet an operational need, provided development is proportionate to the nature and scale of the site, its setting and countryside location; or</p> <ul style="list-style-type: none">● small scale sites for low key tourist accommodation appropriate to the site, location and the setting. Development proposed in accordance with this policy should not cause harm to the character and landscape of the area or neighbouring uses, or create inappropriate noise/light and traffic generation. <p>15.3 It can be seen that this Policy covers the area to the north of the boundary of CP18 on the Composite Plan at Whiteley. This underlines how illogical the Gap Policy is. There is a greater chance of achieving infilling in the areas beyond the Gaps. These areas are at a greater distance from facilities and are less sustainable.</p> <p>16.0 CONCLUSION</p> <p>16.1 This objection has three related strands. It seeks the deletion of the Settlement Gap Policy NE7; it requires the Local Plan to address the requirements of paragraph 69 of the National Planning Policy Framework; and it seeks the restoration of the equivalent of the adopted Local Plan Policy MTRA4 of LP1 rather than series of policies in the emerging Local Plan</p> <p>16.2 The case for the deletion of Policy NE7 is set out in this Objection. It is crystal clear that this Policy and the previous Settlement Gap Policies CP18 and SH4 fail all of the tests established in the PUSH Guidance entitled “A Policy Framework for Gaps” published in 2008. This Guidance is still relevant and it is quoted in Policy NE7.</p> <p>16.3 The EiP Inspectors made clear that Gaps “must include no more land than is required to prevent coalescence and retain separate identities; it does not mean that every piece of land between the settlements should be left undeveloped</p> <p>16.4 Invariably, the Gaps included every inch of land in the respective gaps.</p>	
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	<p>16.5 The EiP Inspectors recommended that there were no proposals for gaps in Winchester District.</p> <p>16.6 The EiP Inspectors stated:- Winchester City Council suggest that the gap should be extended northwards beyond the railway and reach up to Wickham. This is a case of extending a gap to find a settlement when the motorway, let alone railway, is an appropriate physical barrier to curtail development.</p> <p>16.7 The Council has now extended the Gap beyond the railway and up to Wickham. There is no justification for rejecting the Inspectors' recommendations.</p> <p>16.8 PUSH introduced Guidance in 2008 that provided four basic tests:-</p> <ul style="list-style-type: none"> • The open nature/sense of separation between settlements cannot be retained by other policy designations; • The land to be included within the gap performs an important role in defining the settlement character of the area and separating settlements at risk of coalescence; • In defining the extent of the gap, no more land than is necessary to prevent coalescence of settlements should be included having regard to maintaining their physical and visual separation. <p>16.9 The Council invariably breached these tests. It is quite obvious that there are no settlements at risk of coalescence. Many of the Gaps could accommodate major development and still not cause coalescence.</p> <p>Paragraph 69 of the National Planning Policy Framework</p> <p>16.10 The second strand of the Objection concerns Paragraph 69 of the NPPF. The Council has relied on sites that predate the publication of the NPPF in 2021. It appears that the references in paragraph 9.23 to Policy H3 'Delivery of Small Sites' and to Policy H4 'Settlements without defined boundaries' effectively exclude more development that</p>	
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	<p>could meet the requirements of the NPPF. The Local Plan claims that it has already met this requirement.</p> <p>16.11 Paragraph 69 of the NPPF that requires at least 10% of the housing requirement to be accommodated on sites no larger than one hectare. There are many sites that could satisfy this requirement in Gaps but the Local Plan policies appear to exclude consideration of sites in Gaps. Policies H3 and H4 should be amended to allow the possibility of infilling across the District.</p> <p>16.12 The NPPF paragraph makes clear that the provision of small sites has many benefits. It assists smaller companies who cannot compete with the volume builders. The developments can be completed and delivered more quickly. It provided economic benefits because it enables small building contractors who are unable to obtain work with the larger companies and these builders usually employ local people. The deletion of the Settlement Gap Policy NE1 would create the prospect of releasing small sites that this Policy precludes without any justification.</p> <p>Policy MTRA4</p> <p>16.13 The third strand of the Objection seeks the restoration of a policy equivalent to MTRA4 of the adopted Local Plan. This policy is more than adequate to protect the countryside without the draconian restrictions of the unjustified Gap Policies.</p> <p>6.14 The emerging Local Plan is unnecessarily complicated.</p>	
<p>BHLF- KSAR- N8BD-W</p>	<p>Policy NE7 - Settlement Gaps Objections and comments</p> <p>The Trust has for some time wished to protect the landscape setting of Winchester and has set out its reasons and proposals for this in a new policy on page 22 of this response. However, if this is not accepted then a lesser alternative would be the creation of a new settlement gap as follows:</p> <p>The Trust objects to the omission of a settlement gap between</p>	<p>Comments Noted. The gaps are carried forward from the existing Local Plan and have been justified and assessed through previous local plan processes, including the requirement that no more land than is necessary to prevent coalescence should be included. This process did not identify the need for a</p>

	<p>Winchester/Olivers Battery and Hursley.</p> <p>The countryside to the east of Winchester is protected by the South Downs National Park. The area to the north, by the Winchester – Littleton and Winchester- King’s Worthy settlement gaps. The countryside to the west is, to some extent characterized by country parks and the undulating downland including a golf club. However, the land to the south which is the subject of intense development pressure appears vulnerable and should be protected by a new settlement gap.</p>	<p>Winchester – Hursley gap and the emerging Local Plan does not propose any development that would bring these settlements closer together. Were such development to be proposed in future the justification for a gap may need to be reviewed.</p> <p>Recommended Response: No Change</p>
BHLF-KSAR-N8B2-B	<p>We would like to object to the Settlement Gap Policy NE.7 and would seek its deletion;</p> <p>This is because there are already sufficient policies in place to manage development in the countryside outside of settlement boundaries. With the settlement gap policy, it has become difficult for small-scale infill development to take place on the edges of settlements. Such development is often in more sustainable locations, well placed in regard to transport and other infrastructure and can assist help the sustainability of some of our local communities and the services that they rely on. These schemes are often the lifeblood of small SMEs and local building contractors, and help support local residents. We therefore do not see the added benefit that the Settlement Gap policy provides but only the damage it can do to our local economy where flexibility within the constraints of countryside policies is permitted.</p>	<p>Comments Noted. The gap policy only applies outside settlement boundaries and built-up areas, where residential development is normally resisted anyway. As set out in the Policy, some development would be permitted within the settlement gaps, if allowed by other policies, as long as it can be demonstrated that development that does not undermine the function of the gap and its intended role to define and retain the separate identity of settlements will be permitted.</p> <p>Recommended Response: No Change</p>
BHLF-KSAR-N86N-U	<p>It is acknowledged that gaps between settlements are a tool that can assist in minimising the potential for coalescence between built-up areas, although as noted by draft policy NE7, some development can still take place within gaps without undermining their overall function. However, the starting point for any new gap policy should be a thorough review of the existing gap, to identify whether the land</p>	<p>Comments Noted. The gaps are carried forward from the existing Local Plan and have been justified and assessed through previous local plan processes, including the requirement that no more land than is necessary to prevent</p>

	<p>originally designated for this purpose continues to fulfil this function, or whether parts of the gap are no longer required, to ensure that any remaining gap includes no more land than is strictly necessary. As this analysis does not form part of the Council's evidence base, it is impossible to determine whether or not the proposed policy is justified, and ultimately sound.</p>	<p>coalescence should be included. It is not necessary to provide an updated evidence base for an existing policy which is being rolled forward and this is not expected for other carried-forward policies. Nor is a comprehensive review of gaps needed unless there has been a substantial change in circumstances, given that the gaps are well-established and have been tested for soundness through the existing Local Plan process.</p> <p>It is accepted that there is a need to identify additional development sites in some locations, although established gaps should not be impacted if there are suitable alternatives available. Therefore, SHELAA sites in the gaps have been assessed when considering the allocation of potential development sites, with gap boundaries amended where necessary.</p> <p>Recommended Response: No Change</p>
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Comments which didn't answer NE7 - settlement gaps

Respondent number	Comment	Officer comment
<p>BHLF- KSAR- N8RD-D</p>	<p>We consider that the extent of the Settlement Gaps should be reevaluated as part of the Local Plan 2019-2039. Paragraph 7.67 sets out that a detailed review will be undertaken as part of a Neighbourhood Plan, in accordance with the principles contained in the PfSH “Policy Framework for Gaps 2008”. The Policy Framework for Gaps 2008 was published before the legislation creating Neighbourhood Plans was made and so was never intended to apply to Neighbourhood Plans. Instead, Paragraph 3.5 of the document states: “The designation of gaps is an integral part of the overall strategy for south Hampshire. Their role and their boundaries will therefore be included as part of any review of strategic development requirements.”</p> <p>The purpose of a Settlement Gap is to separate neighbouring settlements, therefore designations need to be considered as part of the wider vision and strategic development strategy of the Council, supported by an appropriate evidence base appraisal and adopting a clear and robust methodology to assess the definition of settlement gaps consistently across the District as a whole. The review of gap definitions should not be left to local reviews within Neighbourhood Plans which are unable to take any strategic overview of the purposes of the settlement gaps. We consider that leaving the review of gaps to Neighbourhood Plans will result in inconsistencies in the criteria and methodology used to define gap boundaries and, hence the view that it should be considered as part of the emerging Local Plan. Further to this, a number of settlements which are subject to Policy NE7 are not designated Neighbourhood Plan areas, do not have a made Neighbourhood Plan and have historically not indicated an interest in producing one. A review</p>	<p>Comments Noted. The gaps are carried forward from the existing Local Plan and have been justified and assessed through previous local plan processes, including the requirement that no more land than is necessary to prevent coalescence should be included. It is not necessary to provide an updated evidence base for an existing policy which is being rolled forward and this is not expected for other carried-forward policies. Nor is a comprehensive review of gaps needed unless there has been a substantial change in circumstances, given that the gaps are well-established and have been tested for soundness through the existing Local Plan process.</p> <p>It is accepted that there is a need to identify additional development sites in some locations, although established gaps should not be impacted if there are suitable alternatives available. Therefore,</p>

	<p>of the settlement gaps for these settlements including the Swanmore-Bishops Waltham and Swanmore-Waltham Chase gap should therefore be undertaken as part of the Local Plan review.</p> <p>The PfSH has specifically produced guidance (Paragraph 3.1 of the Policy Framework for Gaps 2008) to ensure a consistent approach and to avoid any proliferation of gaps which could preclude sufficient land being made available for development, the following criteria should be used by Local Planning Authorities to select designations for the gap:</p> <ul style="list-style-type: none"> - the open nature/sense of separation between settlements cannot be retained by other policy designations; - the land to be included within the gap performs an important role in defining the settlement character of the area and separating settlements at risk of coalescence, - in defining the extent of a gap, no more land than is necessary to prevent coalescence of settlements should be included having regard to maintaining their physical and visual separation. <p>We consider that a number of the existing Settlement Gaps do not wholly meet these criteria and some incorporate land in excess of what is needed for its intended role to define and retain the separate identity. It is suggested that the Council review the Gaps to ensure that only land that is required is incorporated, therefore making land available for development.</p> <p>Of particular interest to our client is the Settlement Gap “Bishops Waltham – Swanmore – Waltham Chase – Shedfield – Shirrell Heath”. It is considered that some of the land identified as being within the Settlement Gap is not required to separate the settlements of Swanmore - Bishops Waltham and Swanmore - Waltham Chase.</p> <p>Our particular concern relates to the land north of Lower Chase Road, west of Broad Lane in Swanmore (shown bounded in yellow on the above plan). This land does not meet any of the PfSH’s guidance criteria (set out above) for inclusion within a Settlement Gap for the following</p>	<p>SHELAA sites in the gaps have been assessed when considering the allocation of potential development sites, with gap boundaries amended where necessary. These include the site referred to at Swanmore, which was not included as a site allocation and did not, therefore, require a change to the settlement gap.</p> <p>However, paragraph 7.67 of the draft Plan should be amended to delete reference to a review of the gaps.</p> <p>Recommended Response: Amend paragraph 7.67 as follows: Gaps provide a key opportunity to provide green infrastructure around the district, in addition to shaping and maintaining the settlement pattern. They are a valuable tool and the principle of maintaining gaps in these locations is retained. Any detailed review of the boundaries of these gaps will be undertaken as part of a Neighbourhood Plan, in accordance with the principles contained in the PfSH Policy Framework for Gaps</p>
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	<p>reasons:</p> <ul style="list-style-type: none"> • The land in question does not have an ‘open nature’ but is largely developed for residential uses. Its character, whilst lower density, is broadly similar to that of the area to the south of Lower Chase Road. Therefore, the inclusion of that land within the Gap does not contribute to any ‘sense of separation’ between Swanmore and Bishop’s Waltham or Swanmore and Waltham Chase. • The land to the north of Lower Chase Road is of the same character and nearly the same level of development as that to the south of the road. Therefore, its inclusion does not define any significant change in character and it does not help to prevent coalescence of settlements, as the land is already largely developed and is not open. • The inclusion of this land within the Gap definition is demonstrably unnecessary to achieve the appropriate separation of Swanmore from neighbouring settlements and it should be removed, with the Gap being defined by the clear transition to open countryside at the rear boundaries of the properties on Lower Chase Road, consistent and linking with the approach taken to the east of Broad Lane, where the settlement gap is defined at the rear boundary to the properties on the north side of Lower Chase Road.. <p>For the reasons outlined above, it is considered that an area of land situated to the north of Lower Chase Road, be removed from the Settlement Gap and incorporated into the Swanmore Settlement Boundary. The extent of the change to the Settlement Boundary is discussed below under Q3.</p>	
<p>BHLF- KSAR- N8RK-M</p>	<p>4.1 Policy NE7 seeks to retain the generally open and undeveloped nature of defined settlement gaps. The policy lists nine gaps which are defined in accordance with criteria similar to that published in the PfSH Framework. There is no settlement gap review paper within the evidence base and paragraph 7.67 of the draft plan states that any detailed review of the gap boundaries will be undertaken as part of a Neighbourhood</p>	<p>Comments Noted. The gaps are carried forward from the existing Local Plan and have been justified and assessed through previous local plan processes, including the requirement that no more land than is necessary to</p>

	<p>Plan.</p> <p>4.2 The draft local plan carries forward settlement gaps from previous plans, without up to date evidence to justify their designation. Following the examination of the Eastleigh Local Plan Review 2011-2029, the Inspector noted that he saw, “nothing in the Council’s evidence base which seeks to justify on a rigorous and comprehensive basis the need for a gap designation; the choice of location for gaps or the extent of the designated area of any of the gaps identified in the Plan”</p> <p>4.3 The Inspector then went onto say that even if the principle of gaps is accepted, the criteria in Policy 15 of the South Hampshire Strategy would be a good starting point to consider their extent. Policy 15 states that no more land than is necessary to prevent coalescence should be included. Although further guidance has since been published by the Partnership for South Hampshire, the principles still apply: to prevent coalescence and to protect the identity of settlements. We therefore object to the inclusion of settlement gaps without an up to date assessment to justify their designation, location and extent.</p> <p>4.4 The reliance on out of date evidence to justify a settlement gap is also at odds with the strategy which relies on significant windfall development to meet its housing requirements. As stated in Section 3 of these representations, windfall sites within the settlement boundary are a diminishing resource and without an expansion of a settlement boundary, there will be fewer and fewer suitable sites for windfall development.</p> <p>4.5 In addition, not all settlements are covered by a Neighbourhood Plan meaning that in many cases, a review of the boundary will not take place. Even where a plan is being prepared, there is no guarantee that it will be adopted and it is not clear how in these circumstances, significant windfall development can be accommodated within a fixed boundary.</p> <p>4.6 If the Local Plan continues to include Local Gap policies, then a</p>	<p>prevent coalescence should be included. It is not necessary to provide an updated evidence base for an existing policy which is being rolled forward and this is not expected for other carried-forward policies. Nor is a comprehensive review of gaps needed unless there has been a substantial change in circumstances, given that the gaps are well-established and have been tested for soundness through the existing Local Plan process.</p> <p>It is accepted that there is a need to identify additional development sites in some locations, although established gaps should not be impacted if there are suitable alternatives available. Therefore, SHELAA sites in the gaps have been assessed when considering the allocation of potential development sites, with gap boundaries amended where necessary.</p> <p>However, paragraph 7.67 of the draft Plan should be amended to delete reference to a review of the gaps.</p>
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	<p>review of the Local Gaps and all settlement boundaries must be undertaken.</p>	<p>The Windfall Study assumes that existing settlement and gap boundaries are retained. Comments on the windfall estimates are dealt with in responding to comments on policy H1.</p> <p>Recommended Response: Amend paragraph 7.67 as follows: Gaps provide a key opportunity to provide green infrastructure around the district, in addition to shaping and maintaining the settlement pattern. They are a valuable tool and the principle of maintaining gaps in these locations is retained. Any detailed review of the boundaries of these gaps will be undertaken as part of a Neighbourhood Plan, in accordance with the principles contained in the PfSH Policy Framework for Gaps</p>
<p>BHLF- KSAR- N8R2-U Hursley Parish Council</p>	<p>Green Belt and Protection of the settlement gaps</p> <p>The local plan does not comment on the issue of a potential south Hampshire Green Belt promoted by CPRE-Hampshire. This is surprising given the scale of public support for the designation of one and the work being undertaken by PfSH which is considering the merits of such a designation. We would welcome a narrative about how we can protect our green spaces, historic landscapes and natural capital for future generations.</p>	<p>Comments Noted.</p> <p>Based on the conclusions of the Part 1 report that was undertaken by Land Use Consultants on behalf of the PfSH Local Planning Authorities a new green belt designation is considered to be very unlikely in the current policy context. It is not</p>

	<p>The leader of the City Council stated at the Winchester City Council Scrutiny Committee, held on 29th September 2022, that he was unlikely to support the creation of a Green Belt. That position is based on the view that the countryside of south Hampshire would be better protected by a range of policies including defining settlement boundaries and settlement gaps, policies on green and blue infrastructure and biodiversity. The process of defining a Green Belt was also seen as a major impediment as it would involve a number of councils working together in the context of a lack of support from the Government. The potential difficulty of differing councils working together constructively should not be seen as an excuse for not seeking to define a Green Belt.</p> <p>The analysis appears to mis-understand the status of Green belts in national planning policy, (Ref; National Green Belt Policy – https://www.gov.uk/guidance/national-planning-policy-framework/13-protecting-green-belt-land) This whole section is devoted to the subject and nowhere does it set out the Government’s position as being opposed to new designations. The NPPF sets out criteria for the designation of Green Belts, which are met in south Hampshire, ref CPRE Hampshire paper.</p> <p>Development in the Green Belt sets a higher planning ‘bar’ than for ‘normal’ local plan policies. At the local level the study commissioned by the CPRE Hampshire prepared by consultants West Waddy clearly demonstrates that policies to protect gaps is not working, indeed local authorities in the PfSH have allocated sites for development in such gaps. (Ref; West Waddy Settlement Gap Report - https://www.cprehampshire.org.uk/wp-</p>	<p>currently considered that the five tests in the NPPF for new Green Belts could be met, in particular the requirement to demonstrate why normal planning and development management policies would not be adequate, and set out any major changes in circumstances which have made the adoption of this exceptional measure necessary. Therefore, the identification of a proposed new Green Belt is not being progressed.</p> <p>The gaps are carried forward from the existing Local Plan and have been justified and assessed through previous local plan processes, including the requirement that no more land than is necessary to prevent coalescence should be included. This process did not identify the need for a Winchester – Hursley gap and the emerging Local Plan does not propose any development that would bring these settlements closer together. Were such development to be proposed in future the justification for a gap may need to be reviewed.</p>
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	<p>content/uploads/sites/3/2021/04/West-Waddy_Report-on-Countryside-Gaps-in-South-Hampshire_Jan19.pdf)</p> <p>We are therefore concerned about protecting the settlement gaps that exist between the settlements of Oliver’s Battery and Hursley, Pitt and the City of Winchester, Hursley and Compton, Hursley and Otterbourne.</p> <p>Bloor Homes Ltd owns the freehold of South Winchester Golf Course (located close to Oliver’s Battery but within the Hursley Parish area) with the clear intention of delivering a strategic number of dwellings in this location potentially from December 2025. The draft local plan is relying on brownfield sites (such as Sir John Moore Barracks expected to provide up to 1,000 homes) to deliver Winchester’s housing needs to 2039. Bloor Homes argue that more ‘previously developed land’ such as the golf course will also be needed to fulfil Winchester’s housing needs.</p> <p>Hursley Parish Council disputes this. We believe the local plan over-estimates Winchester’s housing needs by using an inaccurate allowance for PfSH numbers. Importantly, as the Hursley Parish is embarking on its own Neighbourhood plan adding a strategic allocation to the draft local plan without an evidence-based needs assessment would not be helpful at this time. Hursley Parish Council requests that Winchester City Council does not include a strategic allocation at South Winchester Golf Course.</p> <p>Given the extent of public feeling concerning the ‘Royaldown’ proposal which was rejected by the public in 2020, there is a need to call on the Winchester Local Plan to confirm the settlement gaps in Hursley Parish as follows;</p> <ul style="list-style-type: none"> - Oliver’s Battery to Hursley – This has been assigned by CPRE to be highly valued landscape - Otterbourne to Hursley – In order to preserve the separate nature of the 	<p>The NPPF does not require local authorities to designate ‘Valued Landscapes’. The majority of the district is protected ‘Countryside’ under current Local Plan policies MTRA4 and CP20 of the current local plan Part 1, and Policies DM15 and DM23 of the Local Plan Part 2. If Valued Landscapes were to be applied, it is unclear which part of the above policies would apply to valued landscapes. It is also unclear what additional protection would be given over and above the existing ‘Countryside’ designation</p> <p>In order for a landscape to be considered ‘Valued’, the Landscape Institute define this as an ‘area having sufficient landscape qualities to elevate it above other everyday landscapes’. The institute has produced a guidance note entitled ‘Assessing landscape value outside national designations’ which includes a range of factors to consider when assessing the value of a landscape.</p> <p>As the NPPF does not define what a ‘valued landscape’ is and contradictions in case law as to what</p>
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	<p>Hursley settlement - Ampfield to Hursley</p>	<p>defines a, 'valued landscape', the Local Plan will not be seeking to designate 'Valued Landscapes'.</p> <p>In practice inappropriate development is protected through the current countryside policies in the adopted Development Plan.</p> <p>Recommended Response: No Change</p>
<p>BHLF- KSAR- N8Z1-2</p>	<p>Within Section 7 of the Reg 18 Local Plan the Council identify a number of 'Key Issues' at paragraph 7.21 with regard to Biodiversity and the Natural Environment. Point xi notes: "The settlement gaps need to be strengthened to avoid the coalescence of towns and villages and ensure suitable separation is maintained between them and new ones may be needed". In draft Policy NE7 the Winchester – Littleton settlement gap is retained (point vii.), wherein the draft policy states that they will be retained, generally open and undeveloped and only development that does not undermine the function of the gap [to define and retain the separate identity of settlements] will be permitted.</p> <p>Notwithstanding the above, draft Policy W2 allocates Sir John Moore Barracks for between 750-1000 homes, along with an 850 space park and ride facility. In so doing, paragraph 12.12 notes that 'approximately half of the site is located in the Settlement Gap Policy NE7'. Very little detail is presented in the Reg 18 Local Plan regarding the proposed allocation and the Council propose at paragraph 12.20 to only amend the settlement boundary 'once a planning application has been approved'.</p>	<p>Comments Noted. The gaps are carried forward from the existing Local Plan and have been justified and assessed through previous local plan processes, including the requirement that no more land than is necessary to prevent coalescence should be included. Nevertheless, there is a need to identify additional development sites in some locations and Sir John Moore Barracks is a substantial, partly brownfield, site which is being vacated and for which the Local Plan needs to set out proposals.</p> <p>Therefore, the Barracks is subject to a site allocation and this is likely to require the gap boundaries to be</p>

	<p>Thakeham understands therefore that no allocation boundary will be drawn in the Local Plan and the site will remain in the countryside. Thakeham does not dispute the principle of using previously developed land and indeed where this is comprised of a former Defence site, it can be an appropriate use of redundant land.</p> <p>However, in the context of the Reg 18 Local Plan, there is a notable lack of detail regarding this site which brings into question the validity of the allocation, absent of an evidence base that supports it. By way of example, approximately half of the Site is within the identified settlement gap by the Council's own admission – additional development in this area will therefore be contrary to policy and limited at best. The remaining area of the site, although in part comprised of existing buildings, is heavily constrained with dense tree cover – additional development in these areas would be limited to those areas already developed. Thakeham estimates that the site would need to be delivered to a density in excess of 40dph in order to achieve the level of development that is expected by the proposed allocation. It is therefore recommended that the Council properly evidence this proposed allocation by confirming how the development will be delivered, to a density and design that respects the sites context and any existing policy designations. In addition, the Council should outline what mechanism they can use to provide the allocation at a future date. This is important as large sites that contribute heavily to the housing requirement of a Local Plan should be clearly identified as deliverable and achievable, so smaller sites are not unjustifiably overlooked. This goes to the heart of national policy. There are other sites in such areas where development can be delivered quickly and sustainably to maintain a sufficient level of housing supply, such as our Site at Littleton.</p>	<p>amended where necessary. Given the early stage of the masterplanning process, it was not possible to indicate the revised gap boundary in the draft Local Plan, but the settlement gaps will be published on the Policies Map as part of the Regulation 19 Local Plan.</p> <p>Redevelopment of parts of the Barracks site that fall within the gap will not, therefore, necessarily be resisted, subject to the outcome of the masterplanning process. See responses to comments on policy W2 for further discussion of this allocation .</p> <p>Recommended Response: No Change.</p>
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Comments from other topics		
ANON-KSAR-N8GX-P	There is no consideration given to the cumulative effect of individual applications for development. There should be a policy, especially considering Class Q permissions. Settlement Gaps should be considered under Section (e) of Class Q and considered 'harmful'.	<p>Comment Noted. This is not a consideration for the Local Plan. This will be considered under the prior approval process.</p> <p>Recommended Response: No Change.</p>

	Recommendations	Officer response
Comments from SA	N/A	N/A
Comments from HRA		

Supporting Text

7.61. Across the district there are a number of areas of generally undeveloped and open land which help to define and retain the separate identity of settlements, an aspect highly valued by many communities, and the concept of gaps is an established spatial planning tool locally with policy included in the current Local Plan. It is also an important element sub-regionally and the Partnership for South Hampshire (PfSH) has specifically produced guidance to ensure a consistent approach is taken across the sub-region in terms of criteria for designation - 'Policy Framework for Gaps' PUSH, December 2008 (www.push.gov.uk).

7.62. In summary, the PfSH Framework advocates the following criteria for use by local planning authorities to select locations for the designation of gaps:-

- The open nature/sense of separation between settlements cannot be retained by other policy designations;
- The land to be included within the gap performs an important role in defining the settlement character of the area and separating settlements at risk of coalescence;
- In defining the extent of a gap, no more land than is necessary to prevent the coalescence of settlements should be included having regard to maintaining their physical and visual separation.

7.63. The Framework states that it will be individual Local Plans that will identify the location of gaps and include policies to set out the types of development which will be permitted, based on the following principles:-

- It would not diminish the physical and/or visual separation of settlements; and
- It would not individually or cumulatively with other existing or proposed development compromise the integrity of the gap.

7.64 Within the district, there are a number of Local Gaps already defined by the adopted Local Plan Review, in accordance with criteria similar to those above:-

- Bishop's Waltham – Swanmore – Waltham Chase – Shedfield – Shirrell Heath
- Denmead – Waterlooville
- Kings Worthy - Abbots Worthy
- Otterbourne – Southdown
- Winchester – Compton Street
- Winchester – Kings Worthy/Headbourne Worthy
- Winchester – Littleton
- Whiteley – Fareham/Fareham Western Wards (the 'Meon Gap')
- Knowle, Wickham and Welborne

7.65. Because of the pattern of development in the southern part of the district, there is a need to consider the potential coalescence of settlements with those in Fareham Borough. The adopted local plans for both Winchester and Fareham identify a 'Meon Strategic Gap' between Whiteley and Fareham, and this approach is retained in the submitted draft Local Plan for Fareham Borough, which is currently the subject of an ongoing Examination.

7.66. In addition, it is proposed to retain a gap between Wickham, Knowle and the proposed Welborne development in Fareham and following adoption of the Welborne Plan by Fareham Borough Council in 2015 the boundaries of the gap within Winchester are confirmed. Further detail on this is set out in policy WK3.

7.67. Gaps provide a key opportunity to provide green infrastructure around the district, in addition to shaping and maintaining the settlement pattern. They are a valuable tool and the principle of maintaining gaps in these locations is retained. ~~Any detailed review of the boundaries of these gaps will be undertaken as part of a Neighbourhood Plan, in accordance with the principles contained in the PfSH Policy Framework for Gaps.~~

Amendments to policy

The local planning authority will retain the generally open and undeveloped nature of the following defined settlement gaps:

- i. Bishop's Waltham – Swanmore – Waltham Chase – Shedfield – Shirrell Heath
- ii. Denmead – Waterlooville
- iii. Kings Worthy - Abbots Worthy
- iv. Otterbourne – Southdown
- v. Winchester – Compton Street
- vi. Winchester – Kings Worthy/ Headbourne Worthy
- vii. Winchester – Littleton
- viii. Whiteley – Fareham/Fareham Western Wards (the 'Meon Gap')
- ix. Knowle, Wickham and Welborne

Within these areas only development that does not undermine the function of the gap and its intended role to define and retain the separate identity of settlements will be permitted.

~~To protect the individual character and identity of these settlements adjoining the proposed SDA at North Fareham, an area of open land is identified as a Gap to be maintained between the SDA and Knowle and Wickham. Any development~~ **should not threaten the generally open and undeveloped nature of the gap and avoid coalescence. Development** which would threaten the open and undeveloped character of ~~this area~~ **these gaps** will be resisted and the land should be managed to secure the long-term retention of its rural character.