

Response to the Main Modification. MM26 Strategic Policy S7 Development in the Countryside

Please explain your comments, including any changes you think are necessary and revised wording (continue overleaf/attach further sheets if necessary)

Policy S7 in the Submission Local Plan stated that: *'There is a presumption against new development in the countryside, subject to other policies in this Local Plan.'* This sentence has now been deleted under MM26. Subsequent sections of policy S7 state what developments are appropriate in the countryside, which include things such as 'the provision of employment through agricultural development'; 'the extension and replacement of existing employment uses,' 'rural workers dwellings', and 'accommodation for Gypsies, Travellers and travelling showpeople.' However, nowhere does it state that large scale developments would not be appropriate, or that care will need to be taken that cumulatively smaller scale developments will not have a detrimental impact on the countryside.

Further guidance is then provided in the policy on the types of impacts which will seek to be avoided which include: 'adverse impacts on the rural, woodland, riparian, or coastal character, the intrinsic character of the landscape including the avoidance of adverse landscape impacts on areas adjoining national parks and their settings, the significance of heritage assets and on the biodiversity of the area.' These constraints are welcome. However, the use of the words 'will seek to be avoided,' implies a measure of flexibility, and seems to imply that if the need for development is sufficiently great, then adverse impacts would be permitted.

By contrast to the wording of Policy S7 which is entitled: 'New Development in the Countryside,' the wording of policy S8 (now S6) which is entitled 'Protection of Settlement Gaps,' tightly constrains development as MM27 states that:

'1. Development within a Settlement Gap as set out in the Policies Map will be permitted provided that:

a. it would not diminish the physical extent and/or visual separation of settlements; and

b. it would not have an urbanising effect detrimental to:

i. The character of the countryside; or

ii. The separate identity of the adjoining settlements.'

It is clear therefore that development that does not meet these criteria will not be permitted. However, settlement gaps only serve the purpose of preventing the coalescence of settlements, and often contain countryside that is not of high landscape character. For example, in the Settlement Gap Study in the Proposed Gap Boundary Description for Area A Burlesdon, Southampton, Netley, Hamble on page 33 it is stated that: *'Whilst much of the central Gap is of poor landscape quality and is*

threatened by fragmentation caused by sporadic development, field subdivision and intense agriculture the overall sense of openness deliver a sense of separation between the identified settlement edges particularly when driving by car.' It is not therefore high quality or attractive countryside.

By contrast in other areas of the borough which are not designated as settlement gaps such as the land bordering the South Downs National Park in the vicinity of Lower Upham and the land north and east of Bishopstoke and Fair Oak which consists of undulating countryside with an extensive network of ancient woodland, the landscape quality is high and the countryside attractive. However, under the proposed policies for Protection of Settlement Gaps and Development in the Countryside, it would seem that the preference could be given to development in environmentally sensitive countryside rather than a Settlement Gap of poor landscape quality.

This is contrary to the 12 core planning principles of the Framework against which this Local Plan is being judged, which includes '*recognising the character and beauty of the countryside,*' (para 17) and '*protecting and enhancing valued landscapes,*' (para 109).

It is therefore considered that to make it sound the policy on Development in the Countryside needs strengthening to make it clear that major development is not appropriate and that development '*will only be permitted where it would not have an adverse impact on the rural, woodland, riparian, or coastal character, the intrinsic character of the landscape including the avoidance of adverse landscape impacts on areas adjoining national parks and their settings, the significance of heritage assets and on the biodiversity of the area.*'