

July report version

Background Paper: Greenfield Housing Site Assessment

Introduction

1. This background paper sets out the assessment which has led to the initial selection of small / medium greenfield sites for new homes as set out in the emerging Local Plan. This enables all interested parties to review and comment on the assessment, to enable the Council to review its initial selection as needed. It is important to stress therefore that this is an initial assessment which the Council wishes to thoroughly test through engagement with interested parties, before it proceeds to a 'pre-submission' Local Plan.

Need for Greenfield homes

2. The target for the Local Plan is to identify sites for approximately 14,580 new homes (2016 – 2036). The emerging Local Plan set out the expected pattern of housing delivery to meet this target. Approximately 8,780 dwellings either had planning permission or resolution to grant or were proposed allocations carried forward from the previously submitted Local Plan (and assessed as still suitable housing allocations). The remainder of the dwellings required will be delivered either in small windfall sites or new housing allocations.
3. In accordance with national guidance, the Council has sought to ensure that as much development as possible is accommodated within urban areas on brownfield sites. This is likely to deliver approximately 605 dwellings. The Council also explored the scope for a significant proportion of the greenfield development required to be part of a Strategic Growth Option with the critical mass to be able to support new infrastructure provision including new roads, schools and a district centre. This is likely to deliver a further 3,350 dwellings within the plan period.
4. Taking into account completions, outstanding planning permissions, further urban sites and the likely rate of delivery of a Strategic Growth Option, further greenfield residential development is required. This will ensure that the Council can continue to demonstrate a 5 year housing land supply, to meet the overall target for new homes and to ensure a choice and continuity of housing delivery.

National and Sub-Regional Policy

5. In order to determine greenfield sites suitable for allocation, the Council completed a comparative assessment which looked at a wide variety of local factors. It also considered the opportunities to mitigate impacts and group sites together in order to deliver suitable development sites. This accords with the national guidance and approach set out in the National Planning Policy

Framework (NPPF)¹ to plan positively to help meet the development needs in the borough.

6. The NPPF sets out a framework for local plans based on sustainable development principles. These principles cover the economic, social and environmental dimensions of sustainable development (NPPF, paragraph 7). They include supporting economic growth by identifying land for development and infrastructure; creating a high quality built environment and contributing to protecting and enhancing the natural, built and historic environment. The NPPF also recognises that sustainable development opportunities will vary and therefore plans need to take local circumstances into account (paragraph 10).
7. A presumption in favour of sustainable development is applied to plan making (paragraph 14). This requires local planning authorities to positively seek opportunities to meet the development needs of their area and to meet objectively assessed needs. This is unless adverse impacts 'significantly and demonstrably outweigh the benefits' or 'specific policies in this Framework indicate development should be restricted'.
8. Sites identified in the SLAA were not ruled out before the comparative assessment unless they had no genuine potential for residential development or were clearly not suitable in policy terms. In accordance with NPPF paragraph 110 the Council sought to allocate land with the least environmental or amenity value.
9. The criteria used to assess sites were also consistent with the NPPF, its core planning principles and detailed guidance including the following:
 - (a) Transport / Accessibility - managing patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable (paragraph 30)
 - (b) Countryside gaps – responding to local character and history and reflecting the identity of local surroundings (para. 58)
 - (c) Landscape sensitivity – protecting and enhancing valued landscapes (para. 109)
 - (d) Biodiversity - preferring land of lesser environmental value in allocating land (para. 17), minimising impacts on biodiversity and providing net gains where possible (para. 109) and not permitting development where significant harm cannot be avoided, mitigated or compensated for as appropriate for any designations on the site (para. 118)
 - (e) Other Environmental Criteria (agricultural land value; impact of noise, air quality and contamination; mineral reserves; public open space; heritage/archaeology; pylons and pipelines) – conserving heritage

¹ Available at <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

assets (para. 17); minimising pollution and other adverse effects on the local and natural environment (para. 110); taking into account agricultural land value (para. 112), Air Quality Management Areas and cumulative impacts on air quality (para. 124); and avoiding sterilising mineral resources (para. 142).

10. This approach also accords with the sub-regional approach to development set out in the Partnership for Urban South Hampshire (PUSH) Spatial Position Statement². The key components of the statement include minimising Greenfield land take; locating development in areas which are or have potential to be served by high quality rail and bus services; providing a mix of sizes of development sites (including a new strategic site in the northern part of Eastleigh borough); protecting and enhancing countryside gaps; and protecting the environment (Spatial Position Statement, paragraph 1.6). The comparative assessment provides a way of assessing sites as a whole across this range of factors.
11. Although countryside gaps are not specifically mentioned in the National Planning Policy Framework, they are a well-established designation across Hampshire. The PUSH Spatial Position Statement highlights the importance of countryside gaps in maintaining the distinct identity and separation of key settlements to avoid urban sprawl in the sub-region. Policy S1 recognises two categories of gaps; strategic gaps which are of sub-regional importance and local gaps which are of fundamental local importance. The Council's existing policy and recent gap review meet the criteria for their nature, role and size to ensure the consistent designation of gaps throughout south Hampshire as set out in the PUSH Policy Framework for gaps³.

Development Distribution Strategy and Principles Summary

12. Development Distributions Strategy and Principles⁴ agreed by Council's Cabinet and Full Council in 15 December 2016 were used to rule out sites where they clearly would not be suitable (either individually or as groupings of sites). The development principles are based on national planning policy, the sub-regional strategy of the Partnership for Urban South Hampshire (PUSH), corporate objectives, the local plan evidence base, comments of the previous local plan inspector and the response to the Local Plan issues and options consultation.
13. The emerging Eastleigh Borough Local Plan as a whole is based on these strategy and principles. These are also specifically applied to new greenfield development in the borough (emerging Local Plan para 3.8 – see Appendix 6). These address the following requirements: high quality design; a mix of housing types; protecting the environment; retaining gaps between settlements; improved community and recreation facilities and green infrastructure provision and addressing deficiencies in the transport network.

² Available at http://www.push.gov.uk/work/planning-and-infrastructure/push_spatial_position_statement.htm

³ Available at http://www.push.gov.uk/push_policy_framework_for_gaps.pdf

⁴ Available at <https://www.eastleigh.gov.uk/media/283544/RPP-539-Local-Plan-Update-Cabinet-15-December.pdf>

Assessment of Greenfield Sites

14. The process began with the preparation of a Strategic Land Availability Assessment (SLAA⁵). The SLAA includes all 214 sites which have been promoted by landowners or developers, or identified by Council officers as potentially suitable for development, including both residential development and other uses. It assesses each site on a consistent basis against all relevant planning factors, including for example the proximity to facilities, planning designations (for example nature conservation and flood risk) and deliverability. This forms an initial baseline assessment of potential sites. Site promoters have been able to comment on the factual accuracy of the assessment of their own site.
15. The selection of appropriate sites from this long list of 214 sites to allocate for new homes follows four main stages. This background paper summarises all 4 stages, and provides the full detail for stages 2 and 4:
 - Stage 1: From the 214 sites, identifying a short list of sites to assess in more detail. (The background paper “From SLAA to Site Allocations” (July 2017) sets out an audit of how each of the 214 sites has been considered)⁶.
 - Stage 2: A comparative assessment of the short list of sites to identify preferred sites.
 - Stage 3: An assessment of the development capacity of the preferred sites. This identifies the number of new homes that can be accommodated on these sites, and identifies some preferred sites which cannot be appropriately developed for site specific reasons.
 - Stage 4: A comparison of the preferred sites with the results of the sustainability appraisal⁷, which was conducted in parallel and independently by consultants commissioned by the Council.

Stage 1: From a Long to a Short List of Sites

16. It can readily be established that a significant number of the 214 sites are in principle either:
 - Wholly suitable for development: sites with planning permission⁸, or previously developed land within urban areas.
 - Wholly unsuitable for development: sites which are heavily protected, for example by an ecology designation.

⁵ Available at <https://www.eastleigh.gov.uk/slaa>

⁶ Available at <https://www.eastleigh.gov.uk/media/291675/From-SLAA-to-shortlist-for-allocations-report-May-2017.pdf>

⁷ Available at <https://www.eastleigh.gov.uk/media/289684/Eastleigh-SA-Greenfield-site-assessments.pdf>

⁸ or a Council resolution

- Currently unavailable or undeliverable for development: typically sites where no landowner or developer had expressed an interest in delivering the site.
17. It is considered there is no need to assess these sites in more detail. Care has been taken not to exclude sites at this early stage unless it is clear they meet one of these criteria.
 18. Sites which form part of one of the 8 Strategic Growth Options set out in the Issues and Options Paper (December 2015) are not assessed further below. They are assessed separately, considering a similar set of issues to those set out below, but in more detail⁹.
 19. The remaining sites, where adjacent to each other and considered to have similar planning characteristics, are combined to create 40 sites to assess in more detail. Figure 1 sets out maps of these sites.

Stage 2: Comparative Assessment of Short List of 40 Sites

20. The comparative assessment of 40 sites is based on considering the following topics. These have been devised to cover and distil all the key relevant points to consider in deciding the location of greenfield development, based on the National Planning Policy Framework, PUSH Spatial Position Statement, and the Council's Development Distributions Strategy and Principles, as set out in more detail above. The topics are:
 - (a) Transport and accessibility: Proximity to the nearest local and district / town centres, and the size of that centre; proximity to other supermarkets, primary and secondary schools, doctor's surgeries and public transport.
 - (b) Countryside Gaps: Whether a site is in a countryside gap, and if so whether or not the development of the site would erode the purpose of the gap to maintain the separation of and protect the identity of individual settlements.
 - (c) Landscape sensitivity: An analysis of the character of the countryside to establish its overall quality and sensitivity to change
 - (d) Biodiversity: Whether an ecology designation affects part of the site, or is close to a site, and the importance of that designation. The scoring is based on the potential for impact if no measures are put in place, to provide a consistent baseline. It is worth noting that sites which would involve the direct loss of an ecology designation have already been excluded in stage 1, and that in reality sites that are close to such designations can usually (but not always) be designed to avoid any adverse impact.

⁹ Currently set out in the 20 July 2017 Council report on the emerging Local Plan

- (e) Other environmental criteria: Whether or not the site is of good agricultural land value or is affected by noise, air quality, contamination, mineral reserves, public open space, heritage / archaeology, pylon or pipeline issues.
21. The assessment of these topics was undertaken by the Council's planning policy, transport policy, landscape and ecology officers. Appendices 1-5 set out, for each topic, the criteria for assessment, and the assessment of each site. Sites were assessed and scored as 'poor' (-1), 'average' (0) or 'good' (+1) for development, with the occasional 'very poor' (-2) or 'very good' (+2) for biodiversity. The classifications are based on the appropriateness of a site for development. Therefore, for example, a site which has high ecological or landscape value / impact, would be classed as 'poor' for development.
22. Table 4 sets out the summary of the scores for each site by topic. These scores are then added up to create a total score for each site, based on the following weighting:
- (a) Transport / Accessibility – 100%;
 - (b) Countryside Gaps – 100%;
 - (c) Landscape Sensitivity – 100%;
 - (d) Biodiversity – 100%;
 - (e) Other environmental criteria – 50%.
23. Factor e. was only given a 'half weighting' as the issues are considered to generally, with the exception of agricultural land quality, affect only the design, layout and therefore development capacity of the site, or else the phasing of the delivery of the site, and not the principle of whether the site should be developed in the first place.
24. The preferred sites have not been selected simply on the basis of those which have achieved the highest total scores. The initial view is that the protection of countryside gaps should be prioritised and therefore sites which scored 'poor' or 'poor / average' should be ruled out from development on this ground alone. A number of reasons are advanced at this stage for this approach, and the Council will welcome further views on these:
- (a) The Borough contains a lot of towns and villages in a relatively small area often separated from each other or the adjoining major urban area of Southampton by relatively narrow gaps;
 - (b) In this context, the protection of these gaps is important to maintain the separate identity of towns and villages, prevent urban sprawl, and ensure that more people have sight or access to local countryside;
 - (c) The protection of countryside gaps is a long established policy across South Hampshire, most recently re-emphasised by the PUSH Spatial Position Statement (2016);

- (d) The public response to this Council's Issues and Options paper highlights the importance residents place on protecting countryside gaps; which is included as a principle in the Council's "Development Distribution Strategy and Principles" (December 2016);
- (e) Countryside gap designations are effective because there is a direct relationship between the aim (preventing the coalescence of settlements) and the mechanism (avoiding development in the gap). To put it another way, the only way to maintain the separation of settlements is to avoid putting development in gaps. Scores of sites range from 'good' to 'poor', with some sites not in gaps at all, through to other sites which would represent major development across a significant part of the gap. In other words, the choice of sites made will have a clear and significantly different impact on the protection of countryside gaps in the Borough;
- (f) Sites have already been ruled out solely on the grounds of protecting ecology designations in stage 1. Biodiversity is therefore being treated with equal importance to countryside gaps. The remaining sites are not within but may be close to ecology designations, and with careful design these can generally be appropriately developed without adversely affecting these designations;
- (g) In terms of transport / accessibility it is considered that the difference between sites is relatively subtle. They are all greenfield sites on the edge of settlements and so none are adjacent to major centres or transport hubs. Therefore it is not surprising that only 1 of the sites has been scored as 'good' in transport / accessibility terms, all the others are scored as 'average' or 'poor'. Relatively modest differences in the distance of sites from a bus route or shops are considered unlikely to result in significant differences in the use of cars, public transport, cycling or walking. Furthermore, it is possible that the underlying transport aims (reducing congestion / pollution, and increasing access) may be achieved in a variety of non-planning ways. In other words the relationship between the policy aim and mechanism is relatively weak, compared to that for countryside gaps;
- (h) None of the sites are designated for their landscape qualities, and in any case the methodology does not result in any sites being allocated which are classed as 'poor' in landscape terms (i.e. none have a high landscape sensitivity);
- (i) Sites have not been scored 'poor' in countryside gap terms simply because they are currently in a designated gap. 6 sites are in the currently designated gap but it is considered they can be developed without eroding the purpose of the gap and so are allocated. In other words there has been no 'blanket ban' placed on development in gaps;
- (j) Finally 'poor' countryside gap sites have not been 'ruled out' at an early stage, but have been included in the comparative assessment so that the implications of excluding them can be understood.

25. This approach rules out the 17 sites which are classed as 'poor' or 'poor / average' in terms of their impact on countryside gaps. The remaining 23 sites are the preferred sites which are taken forward to the next stage of assessment.
26. It is worth setting out with some specific examples the effect of prioritising the protection of countryside gaps. Table 4b re-orders sites according to their total score. These range from +4 to -4.
27. There are 3 sites whose total score is amongst the highest (+2 to +4) but which score as 'poor' for their impact on countryside gaps. Therefore these sites have been excluded when they might otherwise have been selected as preferred sites. These are sites 14 (Rickwood Farm); 35 a/b (South of Pound Road, Bursledon); and 38 (North of Satchell Lane, Bursledon).
28. These are all small sites so their exclusion does not mean that an opportunity to put a significant scale of development in an otherwise good location is being missed. They all score 'average' for transport / accessibility so in these terms an opportunity is not being missed to locate development in a particularly good location. They all score 'good' for landscape and 'very good' for biodiversity and so in these terms an opportunity is potentially being missed to locate development away from sensitive areas. This point is worth noting in itself. Nevertheless the potential impact on nearby biodiversity can often be avoided through careful design. Therefore in one sense the real question is whether this can be achieved on the site which is allocated as a result of not selecting these sites (see the next paragraphs). Finally it is worth noting that sites 14 and 38 are 'in the middle' of the countryside gap and not an extension of an urban area, which is considered to make the case for not selecting them clear cut.
29. There is 1 site whose total score is amongst the lowest (-2 to -4) and is allocated. Therefore this has potentially been included as a result of not selecting the 3 sites above. This is site 33 (South east of windmill, Bursledon). This site scores 'poor' for transport / accessibility and 'average' for landscape. These are not untypical scores, many of the sites which have a higher total score still score similarly for these topics. The site scores as 'very poor' for biodiversity. Therefore the layout and design of development will need careful consideration at the planning application stage to ensure there is no significant adverse impact.
30. The preceding paragraphs ensure that the practical effect of prioritising countryside gaps is set out transparently. Whilst noting the effects, it is not considered this 'reality check' reveals a fundamental problem with the overall approach.
31. Ultimately the relative weight to be attached to completely different issues (i.e. transport, countryside gaps, landscape) is a subjective decision which should be taken by the elected Council. The overarching approach set out above was clearly explained in the report to Council on 20th July 2017 to enable its members to note the initial approach at this stage.

Stage 3: Development Capacity

32. The 23 sites which passed stage 3 were then assessed in terms of their development capacity. This considered all relevant issues which would affect how the site is developed, including for example the planning history, site levels, access, trees, ecology, flood risk, listed buildings, noise or poor air quality, utilities, minerals, archaeology, and land contamination. This establishes whether the site can be appropriately developed, and if so, the developable area. Standard development densities are then applied, taking into account the character of the area, to assess the number of new homes that could be accommodated on the site.
33. Table 1 sets out 6 sites which were considered inappropriate for residential development. Therefore these sites are not allocated in the emerging Local Plan.

Table 1

Ref.	Site	Reason not appropriate
24.	Broad Oak Garage, Botley	Primarily within flood zones 2 and 3
28.	North of Bridge Road, Bursledon	Ecology, air quality, trees.
29.	Providence Hill and Oakhill, Bursledon	Buffer from watercourse required.
35c.	South of Pound Road, Bursledon	Open space; tree buffer; no access
39.	North and south of Kings Avenue, Hamble	Open space; employment
40a, b, c.	Satchell Lane, Hamble	Mineral site; ecology (proximity to Solent Maritime SAC)

34. Table 2 sets out a further site where it is considered to be unclear whether or not it could be appropriately developed. The plan identifies this site as a special policy area setting out the issues which would need to be addressed, without a presumption in favour of development. The main issues to address are ensuring no adverse impact on the Solent Maritime SAC, and a comprehensive development of the site and adjoining boatyard. Given the uncertainties the evidence does not 'count' this site as part of the supply of housing or other development.

Table 2

Ref.	Site	Issue
27.	North of Blundell Lane, Bursledon	Close to Solent Maritime SAC. Affected by M27, trees. Requires access through boatyard.

35. Table 3 sets out the remaining 16 sites which are considered appropriate for development, and refines the figure for the number of homes that can be accommodated. Together the 16 sites can accommodate 1,704 new homes. Sites 3 and 12 were identified in policy DM23 in the emerging Local Plan as sites with either a valid planning permission or Council resolution to permit residential development and were therefore not given a separate allocation. The emerging plan allocates the remaining 14 sites for development.

Table 3

Ref.	Site	Dwelling Capacity
2.	East of Allbrook Way, Allbrook	95
3.	Church Road, Bishopstoke	30 ¹⁰
4.	East of Knowle Lane, Fair Oak	34
7.	West of Durley Road, Horton Heath	73
8.	East of Allington Lane, Fair Oak	38
10.	Lechlade, Horton Heath	13
12.	North of Barbe Baker Avenue, West End	98 ¹¹
13.	West of Woodhouse Lane, Hedge End	600
15.	North of Peewit Hill Close, Hedge End	106
19.	South of Maddoxford Lane, Boorley Green	130
20.	North east of Winchester Street, Botley	300
21.	East of Kings Copse Avenue, Hedge End	70
26.	Braxells Farm, Hedge End	TBC

¹⁰ Resolution to permit for 30 dwellings ref. O/16/79469 – site not allocated but identified in DM23

¹¹ Resolution to permit for 98 dwellings ref. F/15/77718 – site not allocated but identified in DM23

Ref.	Site	Dwelling Capacity
30.	North of Providence Hill, Bursledon	19
32.	Heath House Farm, Hedge End	38
33.	South east of Windmill Lane, Bursledon	51
	Total	1,704

Final Check

36. A final internal check for consistency has identified that a small number of other relatively small sites may have been ruled out at too early a stage, or that circumstance have changed since the assessment commenced. Officers have no further view on these sites at present and will assess them in preparing the final Plan. These sites are set out in Appendix 10 of the background paper “From SLAA to Site Allocations” (July 2017)¹².

Stage 4: Comparison with Sustainability Appraisal

37. The Council has commissioned independent consultants (LUC) to undertake the Sustainability Appraisal process as the Local Plan is prepared. As part of this process, they produced an appraisal of the greenfield sites (July 2017)¹³. This considered the principle of residential development on these sites.
38. Where sites are currently allocated in the emerging Local Plan, Council officers are considering whether the Sustainability Appraisal identifies any additional issues which should be incorporated into the policy for the site. However this section also considers whether or not the Sustainability Appraisal and the Council’s assessment (as set out in this paper) are indicating that the same sites should be allocated in the first place. The full analysis is set out in Appendix 7. This ensures that the Sustainability Appraisal process continues to form an integral part of the plan making process moving forward.
39. There are 40 greenfield sites which are being assessed. Both the Council and the Sustainability Appraisal assessments consider these sites against a wide range of (up to 48) indicators. Clearly this presents the scope for a wide number of detailed variations between the assessments, which might affect the order of preference of sites. However most of these greenfield sites will be required to meet the overall need for homes in any case. Therefore the comparison between the SA and EBC assessments (undertaken by EBC officers) has focussed on the sites which score at either end of the scale. These are the sites where any significant differences between the EBC and

¹² Available at <https://www.eastleigh.gov.uk/media/290333/From-SLAA-to-shortlist-for-allocations-report-May-2017.pdf>

¹³ Available at <https://www.eastleigh.gov.uk/media/289684/Eastleigh-SA-Greenfield-site-assessments.pdf>

SA assessments might affect the overall outcome as to whether a site should be allocated (as opposed to the theoretical order of preference of sites).

40. The comparison of the SA and the Council's assessment has therefore focussed on sites which the SA has scored well but which have not been allocated in the emerging Local Plan; and sites which the SA has scored poorly but which have been allocated in the emerging Plan.
41. The comparison has revealed there is usually a reason for these apparently different outcomes. These usually either reflect nuances in the scoring system, or the priority the Council is giving to protecting countryside gaps. Unlike the Council's assessment, the SA does not seek to weight different factors, and this paper sets out elsewhere why the Council considers it is appropriate to prioritise the protection of countryside gaps. Any remaining disparities generally relate to issues the SA has identified which it is considered will affect the detailed design and development capacity of the site. These will inform the policies for the individual site allocations instead of the principle of whether it should be allocated (as assessed by EBC). Therefore in overall terms, EBC officers consider that the above comparison suggests that the SA and EBC assessments of greenfield sites are broadly consistent in terms of outcome, and that any differences are justifiable.