

Curbridge Preservation Society

Constituted as a Civic Society

Working to Protect Our Natural and Built Environment

LDF Team
Blueprint Consultation feedback
Winchester City Council
City Offices
Colebrook Street
Winchester
Hampshire
SO23 9LJ

07 December 2010

Dear Sirs,

Re: Blueprint Consultation Proposed Curbridge MDA ('North of Whiteley')

Thank you for the fresh opportunity for consultation on the future of our communities under Blueprint, the forthcoming Localism Bill and the final abolition of Regional and Spatial Strategies. Please find enclosed our Blueprint consultation feedback following consultation at our AGM on 23rd November 2010, which will also be published on our website.

We would like to make a single, very precise point on the proposed MDA, which has been specifically designated part of the "*South Hampshire Urban Area*". This Sub-sub-region appears to exist only in Winchester's Core Strategy and not in adopted planning policy.

We believe that as the area cannot be defined as an 'Urban Area' under current urban/rural planning definitions as it has 920 persons less than the minimum population limit of 1,000 dwelling within the dispersed hamlet; that therefore it should be protected from development under the (Department of Communities and Local Government) Planning Policy Statement 4 (2009) Policy EC6 Economic Development in Rural Areas – and particularly point EC6.1.

The reasons for this are as per the attached document.

Yours faithfully

Duncan Murray
Chairman

Curbridge Preservation Society, c/o 1, Woodview Cottages, Curbridge, Hampshire SO30 2HB

www.curbridgepreservationsociety.org.uk info@curbridgepreservationsociety.org.uk

Blueprint Consultation Response Curbridge Preservation Society

Localism, Aspirations and Responsibilities Southern Parishes

Curdridge and Curbridge Parish and “North of Whiteley” Proposed MDA

The “North of Whiteley MDA” is 7/8ths of the rural settlement of Curbridge and yet Whiteley (a different Civil Parish) has a bigger say over our rural settlement’s future than we do; even though it is the vast majority of our rural settlement that is going to be, potentially, irreversibly put to urban use.

Therefore it really is ‘The Curbridge MDA’.

Curdridge Parish Council, our Civil PC, has a current adopted Village Design Statement that informs the planning guidance for the Civil Parish. This proposed MDA is in clear breach of our Civil Parish’s Village Design Statement that was accepted by the local planning authority, WCC.

The Winchester District is 90% rural an area that houses approximately 30% of its residents. The format of the Blueprint consultation did not cater for many of those in rural areas due to being highly prescriptive and getting people to comment on ‘boxes of thinking’. These rural voices are still in danger of not being listened to.

Curbridge is a small rural settlement, of approximately 27 dwellings, some 80 people, that has an agricultural heritage and is the home of equestrian facilities and a sustainable beef farm (Barn Farm Area 2) and the industrial units at Bury Farm (Area 1), it is a CPRE dark skies area (despite light pollution from Whiteley on overcast nights) it has a mixed population from older people, couples with no children to families with young and secondary school age children.

The rural settlement has no mains drainage, no mains gas but does have electricity, telephones and broadband. People who live in these small rural communities, such as Curbridge, with limited resources make an informed choice to do so. They do not want to be consumed within larger, newer, conurbations.

The benefits of living in a rural area, the environment, the biodiversity, the natural heritage all mitigate significantly any potential deprivations, which might be presumed by others. The choice has been made by people dwelling in these rural communities that they do not want the ‘*cul-de-sac*’ living of places like Whiteley.

These rural communities are becoming more and more sparse in the drive to concrete over the remaining green areas in the South Hampshire sub-region and particularly the Urban Area Spatial Strategies.

These communities form part of both our heritage and our future, and should therefore be properly protected. Not put at risk from developers’ greed and inappropriate/inadequate planning policies from the 1980s to 2010.

With the forthcoming Localism Bill and the final abolishment of the South East Plan with its Regional Spatial Strategies, the identified present and future, affordable, aspirations of the small rural community of Curbridge are that:

The site of the proposed North of Whiteley MDA (within WCC’s boundary but outside of Whiteley PC’s boundary) is removed from the “*South Hampshire*”

Urban Area” Sub-Sub-region due to reasons of being correctly re-classified as a Rural Area and then the proposed MDA should be abandoned due to being a highly inappropriate development for the defined rural settlement/area of Curbridge and against draft WCC planning policy and PPS 4 EC6.1.

Definitions

1. Government guidance (office of the Deputy Prime Minister 2001-2008 report - Urban and rural area definitions: a user guide) - <http://www.communities.gov.uk/publications/planningandbuilding/urbanrural>)
*“The basis of the definition is land with an irreversibly urban use... To produce consistency in statistical reporting a cut off population of 10,000 is recommended for general purpose use. Adoption of this standard is encouraged where there are no particular reasons for setting a different level. Using this standard, all settlements of over 10,000 are treated as urban areas. All smaller settlements, together with all other land, are treated as rural areas. ...The Urban Settlement boundaries can be used in conjunction with any other geographically referenced data, such as postcodes and any digitised boundaries...
...**Settlement Size Cut-off**
The population threshold of urban settlements that are treated as urban areas can be set anywhere from a minimum of 1,000 persons, to meet particular policy purposes.” **The whole of the rural settlement of Curbridge has approximately 80 persons dwelling within it 920 short of a minimum definition of Urban.***
2. *“The site adjoins Curbridge, a small linear hamlet, and the Burr ridge Road (A3051) to the west...”* (WCC Sustainability Matrix Area 2). **This statement is wholly incorrect.**
3. The rural settlement of Curbridge includes the whole of the MDA that is within the WCC boundary and outside the WPC Civil Parish Boundary, and Botley Road (A3051) runs through the rural settlement!
4. All properties and farms share the same geographical referencing data and settlement definition of SO30 2HB postcode and Curbridge designation.
5. The proposed MDA is in an area defined in WCC’s SHLAA ID ref 1969 as: *“Within Settlement: Countryside...and Other Constraints – Greenfield Land: YES”*. The very document itself is titled ‘Information on sites outside the defined settlement boundaries’ (modified 10 March 2010) and is about proposed rural sites. The inclusion within the South Hampshire Urban Area is therefore wrong as it is classified by WCC as both *“Countryside”* and *“Greenfield”*; i.e. not *“...land with an irreversibly urban use...”* As per the definition (in point 1) above.
6. We are most concerned that, according to Persimmon Homes (and others) in their replies to the Core Strategy Preferred Option 2009 consultation stated that the *“South Hampshire Urban Area”* used as a defining Sub-Sub-Region/area for the West of Waterlooville and North of Whiteley MDAs does not have any basis in existing planning policy or its geographical referencing. We seek assurance that this area does actually/already exist in planning policy.
7. Even on the HCC 2007 (Spatial Strategy Group) map of the South Hampshire Sub-region, the area of the proposed MDA is clearly not classed as an ‘Urban Area’, as currently published on the PUSH website. In fact in April 2010 the HCC ‘Defining Rural Hampshire’ report used the 2004 classifications stating that *“The classifications at this level remain unchanged since 2009”* with the figures source being the Department of Communities and Local Government

- showing the area of the proposed MDA having a 'Rural and Urban Classification' of ***"Rural: Hamlet and dispersed"***.
8. Curbridge, including Barn Farm (Area 2) and Bury Farm (Area 1) and all the properties between Fairthorne Grange and Bury Farm House share the same SO30 2HB postcode and Curbridge designation – demonstrating that they are part of the same rural settlement (Whiteley has the postcode of PO15 and Burrige SO31) as per above definition re *"The Urban [...and therefore Rural...] Settlement boundaries can be used in conjunction with any other geographically referenced data, such as postcodes..."*.(source – Royal Mail website – postcodes/addresses). Therefore all the land is only suitable for Level 4 planning as is designated for Curbridge in the Preferred Option 2009.
 9. The settlement of Whiteley, has its own administrative boundary, is its own entity and can be described as urban. [rural/urban split graphic – source: HCC 2004 Rural and Urban Classification for Output Areas – Winchester (including ward boundaries (2008))].
 10. Further evidence of the Rural Area definition applying to Curbridge/the proposed North of Whiteley MDA, importantly dated after the previous consultation on the MDA, is found in the following WCC document from 9 December 2009 [CAB 1896 - Cabinet Non-Domestic Rates – Rural Settlement List] *"The whole of England is treated as rural, apart from urban areas that have a population of more than 10,000. Maps issued by the former Department of Transport, Local Government and the Regions (DTLR) designate rural areas. For Winchester City Council, the map indicates that the whole of the District is to be treated as rural, apart from the Winchester Town area. – Rural Settlement List 2010-2011: Whiteley - with the exception of those properties within the Boundary H.3 of the Inset Map No 29 of the Winchester District Local Plan Review (2006)"*
 11. **We therefore consider due to the obvious contradiction, of the above definitions, to Areas 1 and 2 (within WCC's boundary, but outside of Whiteley PC's boundary) as being 'urban'. That this points to the classification as such being completely inaccurate, in breach of Government guidance/definitions and invalidates it as being part of the 'South Hampshire Urban Area' for that particular spatial strategy of housing/development.**

Development/ Community

12. Curbridge, a dispersed rural settlement, is about to be ripped apart – this should not be allowed to happen.
13. The PUSH Sub-region is about economic development - Planning Policy Statement 4 (2009): POLICY EC6: Planning for Economic Development in Rural Areas: specifically point EC6.1 *"Local planning authorities should ensure that the countryside is protected for the sake of its intrinsic character and beauty, the diversity of its landscapes, heritage and wildlife, the wealth of its natural resources and to ensure it may be enjoyed by all."*
14. Within WCC's SHLAA ID ref 1969 where the proposed land is describe as *"Countryside"* and *"Greenfield Land"* with Legislative Constraints *"SSSI (part), Ramsar (Adjacent) , SPA (Adjacent), Listed Building"*, Policy Constraints *"Ancient Woodland (part) and SINC (part)"* and Physical Constraints *"Flood Zones 3a or 3b (Yes-part), Flood Zone 2 (Yes-part)"*. It should come under the protection of PPS 4 EC6.1 above.
15. Rural areas should not be arbitrarily, and against government guidance, split into 'Urban' and 'Rural' areas within the same rural settlement/Civil Parish

- purely for the reasons of inappropriate development and that such created sub-sub-regional boundaries should only follow appropriate local administrative boundaries, and accepted definitions, not individual fields.
16. Developments for urban areas should be kept within their own civic parish boundaries/defined urban settlement areas and not impact unduly, or unnecessarily, on neighbouring rural parishes so individual aspirations are limited to the specific Civil Parish.
 17. Whiteley Parish Plan survey 2008 had when asked what they would least like to see happen in Whiteley in the future (1002 households completed surveys that were returned providing an overall response rate of 37%) over half of respondents (59%) said that they do not want to see any more development or 'uncontrolled' development. This agrees with our own aspirations. Further the Whiteley survey asked how supportive respondents were to the provision of affordable housing in Whiteley, only 37% are supportive with the remainder not that supportive or not supportive at all.
 18. Development levels for communities from the 'Preferred Option' should be applied both to the built and natural environments of those communities, in the case of Curbridge, Level 4 [*Development limited to small scale affordable housing schemes with 'enabling' market housing permitted where necessary (no more than 20%) to meet demonstrable local needs – source WCC Preferred Option 2009*]. This is only development appropriate for the village and the surrounding farmland.
 19. The proposed MDA of "North of Whiteley" is being massively over-proposed; even the virtually defunct South East Plan only needed 2300 homes and the overdevelopment was questioned (CAB 1809 6/3/2009) but by the time of the Winchester City Council Draft Infrastructure Study for Consultation November 2010 (pages 120- 129) the number of proposed dwellings had increased to 3500. A massive 50% increase from SE Plan's hierarchically imposed target.
 20. At the present time and with the proposed MDA, Curbridge is being put at risk from the planning debacle of Whiteley from its inception to its unsustainable, and ever increasing, sprawl in the present day. Whiteley should be restricted to its parish boundaries and its aspirations should be constrained to those boundaries' capacities and their aspirations' affordability with our current and future economic climate.
 21. There are considerable concerns over the possible misrepresentation in the Blueprint consultation for Whiteley as the Parish Profile used as part of this process is for the WCC area of Whiteley i.e. the pdf provided by WCC states that in 2011 there are only 1382 dwellings in Whiteley when Whiteley PC's own records for 2008 show **2811** households in the postal address file for the civil parish when they posted out a consultative questionnaire. We seek assurance from WCC that only Whiteley WCC residents contributed to their Blueprint consultation feedback.

Environment

22. The Sustainability Matrix (WCC 2009) for Area 2 North of Whiteley MDA demonstrates on almost every single environmental issue the proposed MDA is highly unsustainable.
23. Agreement with the contents of the letter from Dr Pauline Holmes of Hampshire and Isle of Wight Wildlife Trust to Winchester City Council of 2 July 2009. This is especially with regard to the Trust's point in that: *"3.2 In addition to our comments above relating to the spatial distribution of the sites the Trust believes that the delivery of the 3,000 houses on the site allocated as North Whiteley will not be able to be achieved without having a significant*

impact to the designated sites and protected species. New SINC information has emerged and this in our view needs to be taken into account in the strategic level assessments.”

24. A specific Appropriate Assessment under the HRA Regulations needs to be carried out on the European Protected Site (SAC/Ramsar) of any proposed development and its potential effects including potential impact on other SAC/SPAs in the vicinity.
25. Protected species including Dormice (European) and bats (including the rare Barbastelle) and their habitats/feeding routes must be protected.
26. The whole area of Curbridge needs to be nurtured for the future of the local environment ensuring that climate change, and its challenges, are able to be met and to offset Urban Warming from Southampton and Portsmouth amongst other local urban areas.
27. There should be a minimum strategic and environmental gap of 400m from a RAMSAR/SAC to any development in mitigation to reduce the likelihood of habitat damage and pollutant run-off. SINC and SSSI should also have environmental gaps to protect species and habitats.
28. Existing, old, properties in Grade 3a and 2 floodplains should not be negatively impacted on by fluvial flooding from the hard surfacing of fields that will have a small time of concentration for rainfall before entering the tidal river where tidal and fluvial flooding combined will have devastating effects on property and the home owners who have no flood insurance available to them.
29. Tidal levels are rising as shown by the Highest Equinoctial Spring Tide Predictions from the National Oceanography Centre. All the dates below (and 3 days either side of them) are very high flood risk dates, twice a day, for Curbridge if there is any combination of fluvial flooding, low air pressure and a westerly gale with the high tides:

4.97m	20/Mar/2011	5.08m	27/Oct/2011
4.94m	9/Apr/2012	5.06m	15/Nov/2012
4.89m	13/Jan/2013	4.99m	4/Dec/2013
4.99m	3/Jan/2014	5.06m	9/Oct/2014
5.01m	22/Mar/2015	5.13m	28/Oct/2015
5.01m	9/Apr/2016	5.13m	15/Nov/2016
4.95m	28/Apr/2017	5.04m	5/Dec/2017

30. The particular risk from the MDA is that all the ground is raised, and water flows downhill. Therefore at a time of high rainfall levels SUDS will not cope and the fluvial flooding, from the hard surfaced areas of the MDA, will have a very short time of concentration before they hit Curbridge from 3 sides and down both the streams, and have only one direction to escape; however that will be full of the high tidal water – which will also be exacerbated by downstream fluvial flood water entering the river.
31. The Environment Agency has expressed its concerns over SUDS issues for Area 2 and water quality run-off into the Hamble SAC. These concerns should be heeded and the quality of water flowing into an SAC be protected.
32. Southern Water have concerns over capacity issues of the 24” water main that crosses the site and supplies Whiteley to cope with the additional demands and the situation if the pipe fails.
33. The natural environment SINC and SACs/RAMSAR sites should be properly protected from the impact of development and undesirable human recreational pursuits.

34. Proposed large scale wind turbines within the MDA will have a detrimental effect on the local environment both in terms of visual impact and on species such as (inter alia) Sparrow Hawks and Tawny Owls and should not be permitted.
35. The Whiteley Way has been moved (in the Draft Master Plan) to a different route as it would not be considered environmentally ethical in this day and age to do what might have been acceptable in the 1980s as the original route destroyed more SINC's than the recently proposed route. All SINC's should be properly protected. We wonder what outrage will be felt in the future over the destruction of these SINC's if the Whiteley Way and Area 2 are allowed to progress to development.

Transport

36. Delivering Strategies' Winchester District Local Development Framework Transport Assessment (Stage 2 Report) Final Report for Winchester City Council, November 2009, Chapter 5, North of Whiteley: *"5.4.5 With additional development, there will clearly be impacts on the M27, as shown in Figure 5.1 – 636 vehicles in AM Peak to the east of Junction 9 and over 488 to the west. In addition, a further 422 will be using the junction to gain access to routes to the south adding to congestion here and at Segensworth Roundabout. Given the congestion already experienced here, this level of additional demand is unsustainable and will require significant mitigation."*
37. Increased traffic from development on Local Road Networks (which are already at capacity) should only be allowed when increased traffic can be successfully mitigated rather than significantly worsening the current situation. A further 500 cars in the a.m. peak hour at King's Corner (A3051/A334) will cause traffic queues back through the whole of Curbridge. This will become the norm rather than just when there has been an incident on the westbound M27 (between Junctions 9-5).
38. Development that causes an estimated 500+ traffic movements 0800-0900 from the A3051 onto the A334 should not be permitted when there is no real mitigation available as there is no apparent justification by TfSH for a By-pass around Botley – even if the SDA at Hedge End had continued. As far as we understand the situation the existence of a Botley By-pass was always to be a pre-requisite for the completion of Whiteley Way. This will cause significant problems for Botley which is already exceeding its capacity for traffic.
39. Whiteley – from the same profile seem to demonstrate that only 20% of working residents are employed in Whiteley therefore 80% of potential residents in the proposed MDA will probably be travelling out of the settlement and using either strategic or local road networks.
40. The second exit of Whiteley was always proposed to be north of Curbridge; however recent plans show a further exit south of the village which will further impact on the ability of residents to have peaceful enjoyment of their property and affect their safety as road users - as pedestrians, riding horses or on bicycles. This is against the aspirations of residents.
41. The transport infrastructure other than private motor vehicles is dismally poor as reflected by the 77% car usage by Whiteley already (Source WCC 'Delivering Strategies'); the development of 'North of Whiteley' will only exacerbate this as the funding for subsidisation of public transport schemes will be very limited for a long time to come and 'Great Curbridge' will probably never be integrated with Whiteley always existing on its fringes.

Housing/Education

42. The infrastructure and mitigation costs for North of Whiteley are estimated at a staggering £73,000,000 that is to say for 3000 dwellings at least £24,333 per unit. No doubt these costs will, as expected, increase significantly. With the identified mortgage/earnings gap in the district these costs do not positively contribute to affordability or sustainability.
43. Whiteley – from the same Blueprint profile also appear to only have 55 people on the housing register with a local connection. – up to 3500 homes is somewhat overkill to local needs.
44. 3500 homes and 6-8000 at the Eco-Town will adversely affect the local housing market causing an economic slowdown in the area and potentially negative equity for some.
45. Whiteley Parish Plan survey 2008 (1002 completed surveys were returned providing an overall response rate of 37%) had when asked what their future priorities in Whiteley were - primary schools (18%); secondary school (16%) so not a significant aspiration.
46. Curbridge has a mix of housing from small, former tenanted, farm labourer cottages to farmhouses and mansions. There is very little scope for future provision other than under Level 4 [*Development limited to small scale affordable housing schemes with 'enabling' market housing permitted where necessary (no more than 20%) to meet demonstrable local needs – Source Preferred Option 2009*].
47. Local need – there is no identifiable local need for further housing.
48. North of Whiteley will not contribute to any affordable local home owner housing need being resolved for this rural settlement.
49. There is no local identified need for further local educational facilities as the village is well served by both Botley and Curdridge primary schools and Swanmore secondary school.
50. There is no local need for further sports areas as the area is well provided for within less than a mile at Burridge with football, cricket and tennis facilities.

Employment

51. Farming is one of the most important economic considerations in a rural economy, especially with the responsibilities of climate change, reducing the food miles and enabling sustainable land management. It seems somewhat of a contradiction to tarmac over a successful and sustainable beef farm (Barn Farm, Area 2) yet still claim farming's significant economic importance to the district and rural economy.
52. Harmsworth Farm houses a livery business along with Pinkmead and Sherecroft locally – bridle paths are needed in the Parish.
53. Bury Farm also accommodates a lot of local small and micro- businesses including boat builders/repairers that are important to the local marine industries and Cowes Week – many of these would find it difficult to relocate closer to housing due to the fumes from fabricating fibreglass hulls etc. They are an important resource of local specialist skills that contribute significantly to localised employment opportunities.

54. Any development in the locality, as proposed, would have a detrimental effect on the sustainability of nearby Botley and its small range of shops that are a valued local resource.
55. Leisure and Tourism is important to this community, provided by the river and the walks through the National Trust owned woodlands and enhanced by the riverside pub, The Horse and Jockey. All of these resources are important locally for employment, volunteering and sense of community.
56. Employment centres are Southampton, Portsmouth, Winchester. 0% of Curbridge residents work in Whiteley and only 20% of Whiteley residents work in their civil parish.
57. One of the biggest hindrances to the area for attracting employers is over-development that has created congestion on both the local and strategic road networks that are operating at or near capacity, which in the morning and evening peak hours operate at saturation levels.