

Infrastructure Consultation Feedback Curbridge Preservation Society

Curdridge and Curbridge Parish and “North of Whiteley” Proposed MDA pages 120 - 129

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 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.”*
- 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 hamlet and the surrounding area.
- 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.
- 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.

Transport

- Employment centres are Southampton, Portsmouth and Winchester - only 20% of Whiteley residents work in Whiteley.

We believe that the transport infrastructure is and will remain inadequate to support this proposed development; with the proposed infrastructure expenditure at A3051/A334 being totally inadequate and the impacts being without possible mitigation; therefore making it unsustainable and in conflict with PPS12.

Local Road and Strategic Road Networks do not have the capacity for any increase in local traffic from a 3000-3500 dwelling development in Curbridge that will drastically affect both Botley and the surrounding area. 3000 – 3500 more houses will create approximately 5000 extra cars.

We also are aware of WCC's own issues with the Preferred Option... **“Urban Extensions 3.59 Finally, Winchester City Council prefers Option 1, but only if matched by infrastructure, particularly: Whiteley Way/Botley Bypass...”** (PUSH - South Hampshire Sub-regional Strategy: Background Document 2, Housing http://www.push.gov.uk/sub-regional_strategy_background_document_2_-_housing_-_dece.pdf)

It is known from the TfSH report that there is 'no justification' for a Botley Bypass with regard to the M27's issues. It is also known that the Whiteley Way is going to be designed as anything but a high capacity distributor road. If a Botley Bypass is neither contained within HCC's LTP3 nor delivered inline with the early phases then the proposed development will be highly unsustainable as the constraints to the local road network at Botley will remain set by the bridge. Botley Bypass has been included in the past LTP documents as a priority but not delivered.

Botley Parish Council state the following:-

“The increased volume of heavy traffic is causing vibration damage, noise, poor air quality and so on. How many people are aware that vibration is adversely affecting the balance of the Market Hall clock by shifting settlement? The present route is a wide load route; we have the major minerals depot in the whole region and the Ministry of Transport lorry testing facility, both near Botley railway station. The Botley bypass remains a high objective in Hampshire's list and even featured as an example in the recent Local Transport Plan 3 Consultation for South Hampshire. Of course the current economic situation probably pushes the bypass further into the future but the abolition of the SDA has not removed any of the factors that justify the bypass. As we understand it, the SDA in Fareham is to go ahead as are more developments in Whiteley adding more traffic pressure. Eastleigh as a Borough will have a housing target defined by Central Government so the needs will increase. .” Botley PC
(http://mti.botley.com/index.php?option=com_content&task=view&id=570&Itemid=84)

- 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.” This same report also indicated a further 500 cars in the a.m. peak hour at King's Corner (A3051/A334).*
- Whiteley – from the same profile seem to demonstrate that only 20% of working residents are employed in Whiteley therefore following a similar pattern for the MDA 80% of potential, working, residents in the proposed MDA will probably be travelling out of the settlement and using either strategic or local road networks.

At the present time traffic, in the peak a.m. hour, is queued back to Fairthorne Manor (YMCA) every morning a distance of ½ mile from the King's Corner (A334) junction; this will only dramatically worsen let alone when there is an incident on the M27

between Junctions 9 and 5 (as often happens). In future this will stretch back into 'Great Curbridge' and through Curbridge itself. This will be unsustainable.

£250k of traffic mitigation will not ease this neither will £100k in Botley. £1M of road improvements on the A3051 north of the Whiteley Way to the A334 is of little consequence to stationary traffic.

Botley itself has natural constraints to its traffic capacity caused by the bridge over the river and exacerbated by the pedestrian crossing at the primary school. Botley is currently at saturation levels of traffic in the morning and evening peak hours and at capacity many other times of the day.

If the Whiteley extension performs in line with historic Whiteley statistics, rather than planners' aspirations, there will still be a 75-80% of out-commuting to work in Southampton/Winchester/ Eastleigh and Portsmouth. We therefore believe that the increase in traffic exiting onto the A3051 will actually be significantly more than the proposed 500 cars (0800-0900) morning peak and is more likely to be in the area of 1000+. [488 vehicles predicted to use Junction 9 going to Southampton – we would expect them to join the M27 at Junction 7 – why go backwards and join a saturated motorway two junctions earlier and sit in even more traffic before junction 7?]

Access to Junction 7 will be preferred to Junction 9 for Southampton based workers as the A27 into Southampton is also at saturation levels in the morning and evening peak hours.

Without a Botley Bypass any significant increase in traffic levels would be totally unsustainable.

- We wonder how likely it will be that adequate revenue funding will be available to subsidise projected bus transport provision given government cut-backs to county and local authorities; so those aspirations of significantly increased but subsidised bus services will be unlikely to come to fruition.

The northern exit from Whiteley was always proposed to be to the north of Curbridge; however recent plans show an additional exit south of the hamlet's hub 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.

No traffic calming/ offset proposals for the centre of Curbridge have been suggested in the infrastructure plan. This is highly unsustainable if the Master Plan is to be seen through with this 'south of Curbridge' ingress/egress point.

Affordable Housing

- 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.

This is without the land value and the cost of the affordable housing units that are approximately (from PUSH feedback to SEEERA) some £60k each (23,000 in the

PUSH Area at an estimated cost of £1.4bn). With Government cuts where are those (£47m) grants going to come from?

Flooding/SUDS

Tidal and Fluvial flood combined (including water run-off management) is one of the most significant issues facing Curbridge as several of the properties are in a 3a or 2 floodplain. These homeowners are not able to have flood insurance and are at significant current and increased future risk due to climate change; let alone due to fluvial flood water, from hard surfaced land, having a small time of concentration before entering the river.

Page 128 ***"Flood Defences: Strategy yet to be devised (dependant on master plan) so costs unknown... Flood defences not required. Development will be restricted to flood zone 1 areas."***

This is wholly inadequate and high risk and we believe against PPS 25 – it is not just about houses yet to be developed; but also existing properties that are in the floodplain. Significant mitigation of these risks must be achieved especially with consideration to climate change.

Topography: The centre of Curbridge, bordering the river, is situated at the bottom of a valley and has a height of 3m (OS) with the raised ground to the north, east and south of it rising to 20m giving a maximum 17m drop over approximately 300m. With storm water/significant rainfall events (0.1m or more) there are significant flood risk issues that will come with hard surfacing of former agricultural land. It is not believed that SUDS would be able to cope with significant rainfall and a shorter time of concentration of water accelerating down such slopes to the river, feeding into the 2 streams that join at Curbridge Creek's bridge, a tidal river/estuary.

Curbridge is already experiencing significantly increased levels of water run-off coming down the Whiteley Stream, through higher low tide water levels before the bridge, since Bluebell Way has been developed, so the SUDS in Whiteley isn't obviously not fit for purpose.

We believe that the following aspects of PPS25 (Appendices B [5, 9, 11 and 12] and C [4, 5 and 6])have not been taken into consideration in the draft infrastructure report and that these significantly affect the sustainability of the proposed development *"brings, collects and keeps"* and its ability to cause *"mischief and escape"* due to a *"non-natural"* use (Rylands v Fletcher [1868]).

PPS25:

Appendix B

"B5. Global sea level will continue to rise, depending on greenhouse gas emissions and the sensitivity of the climate system. The relative sea level rise in England also depends on the local vertical movement of the land, which is generally falling in the south-east and rising in the north and west. Allowances for the regional rates of relative sea level rise shown in Table B.1 should be used as a starting point for considering flooding from the sea, along with the sensitivity ranges for wave height and wind speed in Table B.2, in preparing flood risk assessments.

B9. In making an assessment of the impacts of climate change on flooding from the land, rivers and sea as part of a flood risk assessment, the sensitivity ranges in Table B.2 may provide an appropriate precautionary response to the uncertainty about climate change impacts on rainfall intensities, river flow, wave height and wind speed.

B11. Flooding in estuaries may result from the combined effects of high river flows and high sea surges. When taking account of impacts of climate change in flood risk assessments covering tidal estuaries, it will be necessary for the allowances for sea level rise in Table B.1 (see para. B5) and the allowances for peak flow, wave height and wind speed in Table B.2 (see para. B9) should be combined.

B12. Indirect impacts of climate change on land use and land management may change future flood risk. For example, changes in crop type, methods of cultivation and harvesting could affect the porosity and surface of the ground and hence the volume, speed and direction of storm run-off.”

Appendix C

“Flooding from Rivers

C4. Rivers flood when the amount of water in them exceeds the flow capacity of the river channel. Most rivers have a natural floodplain into which the water spills in times of flood. Flooding can either develop gradually or rapidly according to how steeply the ground rises in the catchment and how fast water runs off into surface watercourses. In a large, relatively flat catchment, flood levels will rise slowly and natural floodplains may remain flooded for several days, acting as the natural regulator of the flow. This is a function that the planning system should promote and enhance. In small, steep catchments, local intense rainfall can result in the rapid onset of deep and fast-flowing flooding with little warning. Such “flash” flooding, which may only last a few hours, can cause considerable damage and possible threat to life. Land use, topography and the form of local development can have a strong influence on the velocity and volume of water and its direction of flow at particular points. Flooding can occur when culverts and bridges are blocked by debris.

Flooding from the Sea

C5. Flooding to low-lying land from the sea and tidal estuaries is caused by storm surges and high tides. Where tidal defences exist, they can be overtopped or breached during a severe storm, which may be more likely with climate change. The onset of flooding from the sea can be extremely rapid. Deep, fast-flowing water can create an extreme hazard. The severity of such flooding will depend on a number of factors, often in combination: the height of tides; weather systems; wind and wave conditions; topography; the effectiveness of drainage systems; and the condition of flood defences. The consequences and impacts of flooding from the sea and tidal waters are more severe than flooding from rivers. It is for this reason that Flood Zone 3a (see Table D.1, Annex D) has a 0.5 per cent annual probability boundary for flooding from the sea and tidal waters while from rivers it has a 1.0 per cent annual probability boundary.

Flooding from Land

C6. Intense rainfall, often of short duration, that is unable to soak into the ground or enter drainage systems can run quickly off land and result in local flooding. In developed areas, this flood water can be polluted with domestic sewage where foul sewers surcharge and overflow. Local topography and built form can have a strong

influence on the direction and depth of flow. The design of development down to a micro-level can influence or exacerbate this. Overland flow paths should be taken into account in spatial planning for urban developments. Flooding can be exacerbated if development increases the percentage of impervious area.”

- 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.
- 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

- 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.
- 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.
- 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.

Renewable Energy

- 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.

Green Spaces/Environment

- 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.

- Bridle paths are needed across the parish.
- The natural environment SINC and SAC/RAMSAR sites should be properly protected/buffered from the impact of development and undesirable human recreational pursuits.
- 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. Buffer zones appear to be inadequately costed for in land use and landscaping.
- 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.
- Protected species including Dormice (European) and bats (including the rare Barbastelle) and their habitats/feeding routes must be protected.
- 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 than the recently proposed route. All SINC should be properly protected.