

RSS EXAMINATION IN PUBLIC SOUTH EAST

STATEMENT BY CPRE HAMPSHIRE: PARTICIPANT BY PANEL INVITE

MATTER 9 REST OF HAMPSHIRE AND ISLE OF WIGHT

Regarding 9A.2 & 9A.3 - CPRE Isle of Wight is a separate Branch of CPRE. It is not a Participant, but we understand will be submitting a Written Statement to the Panel on questions 9A.2 & 9A.3.

9A.1 Does the draft RSS take proper account of the capacity of towns / locations in the rest of the New Forest, Test Valley, Winchester, East Hampshire, Basingstoke & Deane, and Hart areas for sustainable development (including Policy H1), having regard to existing and future infrastructure growth? If not, how would any additional growth here impact on South Hampshire, Western Corridor and Blackwater Valley and London sub-regional strategies?

1.1 The environment of Hampshire has undergone many changes, and climate change threatens to accelerate the process. Despite this, a high quality environment and countryside remains one of the priceless assets of Hampshire to be nurtured for the future. CPRE Hampshire main priorities relate to the future of the countryside in Hampshire (or, for this purpose, Rest of Hampshire) and to its beauty, tranquillity and diversity. Regional policy is one of the best strategic tools for ensuring the countryside is protected for the sake of its intrinsic character and beauty, diversity of its landscapes, heritage and wildlife. The UK's recent ratification of the European Landscape Convention¹ also highlights the importance of integrating landscape issues at a strategic policy level in the Plan.

1.2 We see the importance of the countryside as fundamental to ROH. It should not be seen merely as a rural backcloth, but as a core element in the life of Hampshire and its future, and as a vital rural buffer between the large towns in the north and south of the county. Concern for its survival and protection is not therefore a specialist interest, but one that affects everyone and all generations. The results of the research conducted by MORI for the Plan showed that 94% of residents consulted were of the view that protecting the countryside was important for them personally.

1.3 ROH has shown considerable growth in recent years despite environmental and development constraints. The natural beauty and other environmental benefits of ROH have given rise to business opportunities related to those benefits that have often fuelled that growth. Development that would adversely impact on the environment of ROH will diminish those opportunities. So, the innovation value of ROH needs to be a key focus for future growth, but not led by development or in-migration.

1.4 The Sustainability Appraisal set out the impacts of the Plan in damaging the environment. Much of this negative impact will be within the sub-regions. Yet it then becomes even more essential to protect the areas outside the sub-regions in order to mitigate the overall damage to the environment of the Region as far as possible, for the benefit of both those living within and without the sub-regions.

1.5 It is critical to appreciate that around half of the area covered by ROH is nationally designated landscape, as illustrated on the map appended to the statement of the Central Hampshire and New Forest Authorities Standing Conference (7710). This includes the New Forest National Park and a significant part of the designated but yet to be confirmed South Downs National Park. The remainder of the designated landscape within ROH is AONB. This large area of nationally designated landscape within ROH demonstrates the sheer environmental quality of ROH. Consideration of the countryside in these areas must be given great weight. Major development should not take place other than in exceptional circumstances, and only after the most rigorous examination and study of alternatives.

1.6 The Local Plan cycle across all Districts in ROH (except Hart) has only very recently been completed and, by way of example, the Inspector in his report on the East Hampshire Local Plan Inquiry (in EiP Library and www.easthants.gov.uk) made the following comment (at 5.8.8) in relation to the East Hampshire AONB:

“I place a good deal of importance upon natural beauty as an environmental constraint. Indeed, as well as treating it as a constraint to development, I see it as a vital part of the District's heritage. Designation as AONB does not preclude development, but if it is to have any clout there must be very good reasons to allocate land within it” And (at 5.8.2) “In general I regard an attack upon part of it [the AONB] as an assault on the whole.”

1.7 Outside nationally designated areas, significant areas of ROH have in the past been recognised as of special value, and much prized locally. Such designations have been replaced by strong criteria based countryside policies in Local Plans. These policies emphasise landscape character assessment, and have strong public and local authority support. They have received approval from Inspectors after extensively viewing the relevant District in the course of the Local Plan Inquiries. They are expected by CPRE to be carried forward into LDFs. The area of countryside north of Alton is an example of this, about which the Inspector quoted above said (at 5.8.9):

“Alton is a small town of great charm and character. The landscape and topography of its immediate surroundings have been important constraints in its development, and those attributes are of no less significance now. It is essentially for those reasons that I recommend against the allocation of substantial amounts of land on the outskirts of the town for residential and other development. The attractive valley sides and the delightful rural approaches to Alton should be protected from these prominent intrusions.”

The same sort of comments may be made of many of the settlements within ROH.

1.8 As a result of CPRE initiatives, the southern boundary of the Western Corridor & Blackwater Valley sub-region was redrawn northwards so as to put outside the sub-region an area of 50 square miles (20 villages) which, although undesignated, was accepted to be of good landscape quality and unsuitable for significant development. The same is true of true of large tracts of ROH.

1.9 Reference to the HCSPR shows how Hampshire's RPG9 requirement 2001-2011 of 60,300 dwellings is provided for by a 'baseline provision' for new homes and a 'reserve provision' on greenfield sites which would be released if, and when, the need arose. It has not been necessary so far, and in recent years rates of new house building in the geographic county of Hampshire have shown marked improvement, and are on target to exceed RPG9 figures without the need to release any of the greenfield 'reserve provision'.

1.10 There is a risk that this HCSPR reserve provision within ROH might be thought to be 'available' en block for development within the RSS. However, beyond the MDAs specifically identified in HCSPR, reserve sites on the ground were a matter for Local Plans to identify and propose. Some were found to be unsuitable or unsustainable on testing at Inquiry. By way of example, the Inspector quoted above said (at 5.8.8) of the reserve sites proposed at Petersfield:

"The way in which appreciated countryside of great beauty surrounds Petersfield and in some instances sweeps in almost to its centre, is a fundamental part of the character and-appearance of this delightful historic market town.....It is a matter of judgement, but I value these local circumstances so much that I accord them even more importance than proximity of housing to services and facilities. I therefore put the Petersfield Reserve Sites towards the end of the list and I very much hope that they will never be developed."

1.11 The reserve sites are not allocated for house building, and remain covered by AONB or countryside policies. The housing numbers allocated in Policy H1 require limited greenfield sites beyond those tested and allocated within Local Plan Inquiries. So, the 'reserve provision' can be removed with the end of HCSPR, along with the blight these sites have caused. This would be consistent with the assurances given by Hampshire County Council and LPAs that these reserve sites were designated for HCSPR purposes only, and would not be 'carried forward' into a new strategic plan but subjected to full review, especially as to environmental constraints and sustainability, before being any possible re-allocation in a new strategic plan. So, for the RSS to impose on ROH greenfield housing beyond current allocations and proposals (on the basis of apparent 'capacity' of settlements) without a full environmental and sustainability appraisal of possible sites would not be sound.

1.12 Finding tranquillity in the countryside matters deeply to people: it contributes to mental and physical health and quality of life - all objectives of the Plan. Most people, wherever they live (including urban areas) say tranquillity is important to them. The national tranquillity map recently issued by CPRE was prepared by researchers from Northumbria and Newcastle Universities based on consultation with more than 1300 countryside users and visitors across England as to their perceptions on what makes them feel tranquil, and what does not. Things that did not included new development and infrastructure, growing traffic and expanding roads, more aviation activity and increased light pollution and spreading sky glow.

1.13 That part of the national map covering ROH (in EIP library and www.cpre.org.uk) shows the deeply tranquil areas within the designated landscape areas, which must be conserved and enhanced; and how the whole of ROH is crucial to finding tranquillity within Hampshire, notably for those living within the non-

tranquil urban areas and the sub-regions generally. Further planned development in the sub-regions will only enhance the need to conserve tranquillity within ROH. So, tranquillity imposes a significant environmental constraint on increased development in ROH.

1.14 As an incidental outcome of measuring tranquillity by the method used by CPRE, the map clearly demonstrates the adverse impact of current development on ROH, environmental constraints, and the very limited scope for sustainable development beyond that within Policy H1.

1.15 It will be necessary for funding for infrastructure investment to be heavily focussed on the sub-regions if the growth of the sub-regions is to be achieved, and the housing numbers accommodated in an acceptable way. Any major infrastructure provision within the dispersed settlements of ROH would have less benefit than if provided within the concentrated urban areas of the sub-regions, and so be less efficient. It would also detract from the success of the local sub-regions. Yet additional development-led growth within ROH would require infrastructure provision and funding beyond that provided by developers as part of development consents. This is unlikely to be forthcoming; and if the infrastructure were to take the form of transport, it would be unlikely to be able at Inquiry to overcome the landscape designation, wildlife and other restrictions that apply to much of ROH.

1.16 In deciding development allocations to ROH account must be taken of the justified needs of the towns and rural communities, particularly for affordable housing, and these should be met in as sustainable way as possible within environmental constraints. However, the basis for survival of some towns within ROH is their attraction as ‘market towns’ for shopping, leisure and tourism. This can be considered a ‘need’, but is one that is put at risk by significant greenfield development on the edge. Some needs, such as the opportunity to live in an affordable house in whichever community a person wishes to live, will simply not be possible to meet within ROH without unacceptable environmental damage and ignoring national designation purposes and justified countryside policies. Having regard to such constraints, we consider that the allocations to ROH within Policy H1 are a reasonable response to local needs, against which they have been assessed by LPAs during the consultation on housing distribution to Districts.

1.17 Having regard to the above, we consider that the draft RSS does take proper account of the capability for development within ROH.

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ⁱ Signatories to the Council of Europe’s (not EU) European Landscape Convention, agree to implement four general measures. The first is to recognise landscapes in law, as an essential component of people’s heritage, identity and surroundings. The second is to establish and implement landscape policies aimed at landscape protection, management and planning. The third is to establish procedures for public participation in the definition and implementation of landscape policies. The fourth is to integrate landscape into its regional and town planning policies and in its cultural, environmental, agricultural, social and economic policies as well as in any other policies with possible direct or indirect impact on landscape. The UK Government announced it had ratified the convention on 21 November 2006. The convention will become binding on 1 March 2007.