

Response to the Welborne Plan - Major Modifications.

MM1 - Page 8 paragraph 1.29: Whilst I have no issue with Council's intention to review the local plan or the proposed timescale, my concern is that the whole *raison d'être* for the Welborne plan has been, and still is, driven by housing figures developed by the unelected body the Partnership for Urban South Hampshire (PUSH).

Welborne is not, and never has been, proposed as meeting the needs of Fareham alone. It is, and will become, effectively a 'dormitory' town for the overflow of population from Portsmouth and Southampton and further afield. No amount of 'tinkering' with the current plan will change the basic fact that this development is unwanted, unnecessary and far too large.

MM2 - Page 20 policy WEL2 1st bullet. The stated fact that the new development will "form a functional part of Fareham", is in direct conflict with the oft-quoted need to ensure realistically sized 'buffer zones' to ensure there is no coalescence between Welborne, Fareham and other local settlements.

6th bullet, 4th sub-bullet. This minor amendment backs up my note above that Welborne is not needed as it will have access "principally to/from the south" and therefore a significant connection to Fareham giving the lie to Welborne being 'self-contained'.

MM3 - Text below paragraph 2 of policy WEL5: The concept of a 50 metre buffer zone has been generally accepted by local residents groups as utterly derisory. The clarification that 75 metres "between buildings" fills me with horror that existing settlements such as Knowle, Funtley and Wickham, could be separated from Welborne by a thin strip of land and a couple of back gardens. I fully support the proposals raised, and defeated, at the council meeting to increase these buffer zones to at least 100 or preferably 200 metres to ensure a realistic separation between settlements.

The 'strategic gaps' between Fareham and Stubbington (approx 1Km) and Titchfield (approx 4-500m) are being hotly defended. Why then should Welborne be any different if it is to be a separate entity and not merely an extension of urban Fareham?

MM4 - Pages 44-45 of policy WEL6: There is a significant difference between what may be proposed in a planning document like this and what will actually occur in practice, several years in the future, when developers find all sorts of reasons to reduce or remove measures to mitigate the impact of pollution. I have no confidence that FBC will be able, with its limited resources, to enforce the letter of this plan once development has begun.

MM5 - Criterion iii of Policy WEL6: I will be pleasantly surprised if developers do actually manage to ensure path and cycle ways are well designed, safe and well-connected. As recently reported nationally, Fareham has the highest car ownership per head in the entire country. Welborne's population will undoubtedly own and use as many cars as the rest of Fareham and require space to park them. Simply inserting a paragraph to "maximise opportunities to prioritise...." will not, to my mind, ensure that people actually make use of those path and cycle ways.

MM6 - Pages 46-47 of policy WEL7: Strategic Design Codes (SDC). Can FBC give *firm* guarantees that SDCs will be thoroughly and comprehensively reviewed, be "flexible and frequently reviewed and updated in the light of changing technologies and emerging opportunities" to ensure that there is, in fact, "a level of design consistency throughout the lifetime of the development". I believe it is much more likely that developers, with their far greater resources than the Council can muster, will try at every stage to ride roughshod over the plans to ensure they achieve the maximum possible profit and using "viability" as a tactical weapon whenever possible.

MM7 - Addition to end of paragraph 5.17: As clearly stated in the Welborne Plan at the beginning of paragraph 5.17, “.....there is currently an oversupply of vacant office space and sites with planning permission across South Hampshire”. No matter when office space is provided, unless real industrial concerns can be attracted to the area, such office space will remain empty.

This represents yet another reason for Welborne residents to seek employment elsewhere thus adding to local commuter misery as well as destroying the ‘self-contained’ nature of the development.

MM8 - Amendment to 6th paragraph (Policy WEL10): Once again, I have no confidence in FBC’s capacity to enforce this policy on developers. Whilst lessons MAY have been learned through the Whiteley experience, where a fully effective district centre is only just now being provided, I believe a similar situation is very likely to arise at Welborne with residents having to commute for many years to Fareham Town, Whiteley or other retail and leisure centres - yet again adding to the commuting disaster in the area.

MM9 - Amendment to Policy WEL16 to allocate a single site for a secondary site: “The school shall be phased to enable an initial intake of pupils by the end of Main Phase 3”, or around 2026 when nearly 3000 homes will already have been built !

This proposal is utterly ridiculous as many hundreds of pupils will have to suffer ‘school runs’ to current Fareham schools for, in many cases, their entire secondary school careers.

The MM fails to question this fact and, in my opinion, misses the opportunity to ensure the secondary school is provided in good time for the benefit of the pupils, rather than the developers !

MM10 - Clarification of Policy WEL18 regarding affordable housing provision:

The following represents yet another ‘get-out’ clause for developers, “.....unless a robust and transparent viability appraisal.....”.

Even later in the amended text there is a second ‘get-out’ - “Where it is agreed that a residential phase will not meet the 30% target of affordable housing, the subsequent phase or phases will be expected required to meet that shortfall in addition to the 30% target if possible in viability terms.”

Not only can developers ‘get away with’ not providing the ‘required 30%’ of affordable housing in each phase but they can also duck the issue by not providing the shortfall in later stages.

Viability in this context, is simply a ‘black art’ whereby developers can claim a plan to be unviable and can, with careful manipulation of figures, build far less than the ‘required’ percentage of affordable homes.

MM11 - Page 92, Policy WEL23 - item iii: Little real consideration seems to have been given to the overall traffic impact that 6,500 dwellings will make on the local road system, despite surveys that claim to show there will be little or no increase in traffic because of the Welborne development !

I cannot believe that it is possible to design a road system that will ensure the majority of vehicle trips to/ from Welborne will go to the south. Even then, a change to Jn 10 of the M27 will only allow those vehicles to access either an already overcrowded motorway or a frequently gridlocked Fareham town.

MM12 - Page 94, Paragraph 7.24 - 1st sentence: The inclusion of a few words, “..a number of locations...”, does not alter the basic fact that the traffic management “plan” for the area is totally immature and does not take sufficient heed of the potential impact on the local road network which is already heavily used, congested and in dire need of significant repair, for which there is no foreseeable funding in the near or, for that matter, far future.

MM13 - *Amendment to the final sentence of item 1. To provide clarification regarding traffic management on the A32:*

The weasel wording of this amendment to MM13 is so full of vague aspirations, e.g. "...some works may be required..., ...it may be more appropriate...,traffic management measures...,appropriate measures will need to be identified..." that the statement is totally meaningless and clarifies nothing !

MM14 - *Page 97, Policy WEL25 - 1st sentence: Amendment to the 1st paragraph to provide clarification regarding the principal access being from the south:*

How can addition of 3 words possibly clarify the principal vehicular access and how can it possibly be enforced in practice ?

MM15 - No observations

MM16 - *Page 114, policy WEL33: (WEL33 actually appears on page 117 of the Publication version of the plan).structural planting schemes will be expected to protect long-distance views...:*

Let's hope the developers and contractors will provide properly designed planting and landscaping to achieve this aspect and in particular the concept of a "Garden Community". I remain to be convinced.

MM17 - *Page 117, Policy WEL36: (WEL36 actually appears on page 120 of the Publication version of the plan). Amendment to criteria ii. to provide clarification on optimising energy efficiency:*

Sub-paragraph ii as amended, begins well by suggesting the development will, "Achieve high energy efficiency standards for all buildings, including meeting the Passivhaus Standard...." but then becomes disappointing as it includes the words "if appropriate".

The Passivhaus standard shall incorporate 10% of dwellings is also good start but then goes on to say "unless it can be demonstrated to be unviable." Yet another 'get out' clause for the developers.

Who will have the final say on what is considered to be viable or otherwise ?

This development will be in its middle-age by the end of this century. The vision should be to build now for that far into the future, not to rely on current standards and certainly not to build the slums of the future !

MM18 - *Page 120 policy WEL37 (WEL37 actually appears on page 124 of the Publication version of the plan).to provide clarification on water efficiency, supply and disposal:*

This Policy appears to cover a multitude of sins. There do not appear to be any guarantees that supply of potable water, removal and treatment of waste water and the risk of flooding are fully or even partly funded at this late stage in the development of the plan.

To rely on developers to "...include details of a comprehensive waste water conveyance and treatment solution for Welborne, including details on the phasing of new waste water infrastructure" and presumably to provide all or part of the funding for that infrastructure, seems to me to be asking for the moon. Each of the above items is likely to be very expensive and will cut deeply into developers' profits.

We have seen too many local examples of how developers do the minimum to achieve their aim of building as quickly as possible and then move on to the next project. It is difficult to hold them to their 'word' in small scale developments - it will be so much more difficult with the enormous scale of Welborne.

MM19 - *Page 123, Policy WEL39 (WEL39 actually appears on page 126 of the Publication version of the plan).....Amendment to whole policy to provide clarification on flood risk and sustainable drainage systems:*

My comments at MM18 above are also valid here. As yet there has been nothing to assure me that a viable system can be put in place to counter the huge increase in runoff into the rivers Meon and Wallington that will undoubtedly occur when much of the countryside between them is covered in concrete and tarmac. I remain to be convinced that the "comprehensive SuDS strategy" will achieve

this. Both these rivers flood irregularly but frequently and the addition of Welborne can only make that situation much worse.

MM20 - Page 125, policy WEL40 (*WEL40 actually appears on page 128 of the Publication version of the plan*).....*Amendment to facilitate the location of the household waste recycling centre only to the west of the A32.*

My only comment is, if we have to have Welborne, siting a HWRC on-site such that residents do not have to cross the A32 is sensible. My concern is that the second paragraph states the HWRC will be provided "...*subject to securing the full funding package*". It seems even this basic infrastructure requirement, which has shifted to an earlier date than originally planned, is even now subject to securing funding !!

MM21 - *Amendment of Phasing Plan et al:*

My major concern here is simply that the provision of Critical Infrastructure is, at this stage, not or only partially funded and there is, again, no guarantee that it will be forthcoming in the current climate of austerity. All of the major infrastructure requirements simply must be in place or at least have guarantees of funding to be sure that this major development can be 'viable'.

The list is long, some thoughts are given:

Provision of potable water

Removal of waste water

Minimisation of the flood risk to Wallington and Titchfield

Major enhancements of the local road network to cope with increased traffic.

Early implementation of M27 Jn 10 modifications

Phasing of the secondary school

Impact on local facilities

Realistic buffer zones to avoid coalescence

Guarantees, not platitudes, to ensure that high energy efficiency will be achieved (Passivhaus)

Assurance that affordable housing targets will be met at each phase.

Assurance that housing will be provided to the best possible building standards.

Guarantee that employment space will attract real industry and actually provide jobs.

Provision of public transport must be guaranteed to be a high priority.

There must be sufficient space for people to live and enjoy the space, not just a concrete jungle !

MM22 - *Deletion of final paragraph of Policy WEL41: To remove references to the deferral of infrastructure contributions and to improve clarity.*

Deferral of infrastructure provision must never be allowed. To do so would compromise the viability of the whole project and impact on the rest of Fareham.

MM23 - *Amendments to provide clarification on monitoring and review:* This is critical to the success or otherwise of the whole project. Monitoring of progress, including ensuring maintenance of standards by developers will be a major task for FBC for the next 30 - 40 years. I sincerely hope the council is up to the task. There are many instances of developers elsewhere in the country not adhering to the "plan" and I suspect Welborne will be no different in this respect.

I remain to be convinced that this plan is "Sound"

Peter Trott