Responding to the latest Consultation on the Welborne Plan, during February & March 2015.

Submission by Piers D Austin C.Env Ref. WP311 7/03/2015

Dear Sir, please take note of and consider the below:-

MM4 (Air quality)

The problem for the proposed Welborne development is that it is situated on the northeast side of the M27 motorway, one of the busiest in the country. The prevailing winds are southwest and so unacceptably high concentrations of noxious exhaust gases, diesel particulates and rubber dust will drift over the area of Welborne. These will not have had time to dissipate into low concentrations and the long term health effects on the residents should be of great concern.

If noise can be categorised under 'air quality' seeing as it moves (by compression) through the air, for those of us who live in Knowle 1.5Km north of the motorway, with the same prevailing winds, the background noise from traffic tyres on the motorway is annoying and irritating, worse in wet conditions. Now take the plan for Welborne which puts so many houses at much shorter distances from the motorway, background noise will be much higher and a significant nuisance factor. Whether we should be putting people under exposure to this noise should be questionable. For sure the houses will need a high level of sound insulation and how much time will people spend outdoors, children playing etc?

Both these influential factors demand a <u>much higher level of</u> <u>investigation</u>. In the absence of any such information, I contest that the Plan cannot be considered effective in terms of the NPPF and is therefore still "Unsound".

MM 12/13/14 (Transport and traffic flows) (WEL23 - WEL28)

The supposed reassurance by the Systra Traffic computer model on which so much emphasis is placed, would appear to be deeply flawed and why is it that those of us who use these roads day in day out can only see the drastic consequences of trying to introduce and integrate the extra volume of traffic in and out of Welborne on to the A32 and M27 motorway?

There is a massively powerful computer called the human brain and a program called 'common sense' it should be used as well! The M27 at peak times is frequently at a 'standstill' as testified by the representative of the Highways Agency who attended the hearings on 21st October 2014! The proposal to make Junction 10 into an 'all moves' the final design of which is undecided, will actually have an unknown effect and removing the aggravation of having to go up to J.11 and do a loop back to J.10 will make the choice to exit or enter the A32 a more favourable decision making it significantly more difficult for traffic to enter and exit Welborne as well as Knowle. In the event of accidents on the M27 which occur at least weekly with the resultant diversions, the A32 becomes extremely heavily congested, making the situation even worse. The weighting and emphasis on the development trying to be 'south facing' on to the M27 east and west and south into Fareham in respect of traffic flow does not adequately consider the higher effect Welborne will have on northbound traffic on the A32 currently and absurdly estimated at 2 per cent. Please assess and evaluate this in greater detail. Again in the absence of any such improved information, I contest that the Plan cannot be considered effective in terms of the NPPF and is therefore still "Unsound".

MM18 (Waste water disposal and drainage) (WEL36 – WEL40)

In respect of Wastewater Disposal we should see at this stage a clear and sound plan as to how this will be achieved with detailed plans and viable costings. For sure a lot of the associated infrastructure such as sewers and sites for pumping stations will need to go in at an early stage of construction and we need to know how this is going to be done. Have preliminary estimates of demand and applications been made to Southern Water and Albion Water with realistic responses? We are in possession of a letter from the Environment Agency's, Romsey Office stating that 'water companies (i.e. Southern Water and Albion Water) will need to demonstrate that any additional discharges such as arising from Welborne would be accommodated within their existing permits. It is highly unlikely that any variation or a new permit, resulting in an increase in discharge would be forthcoming'. This is especially relevant to Albion Water who discharge into the River Meon.

In respect of DRAINAGE I am concerned that the Environment Agencies guidelines will not be current enough to take into account the pace of climate change a result of which severe weather events are becoming more frequent, surprising both the Met. Office and the EA! The joint developers had stated that the land under Welborne was 'permeable chalk' whereas in fact there is an increasing layer of clay with flints down the slope which would, and we know seriously affect the infiltration of rainwater run-off. The impact of introducing significant areas of roof, driveway, roads and car parks together with land compaction during construction all of which will increase run-off with limited options for where it will go. Again I would highly recommend the Drainage and Flood Risk Assessment is done as a pre-requisite to approving the 'Plan'. Once more in the absence of any such necessary information, I contest that the Plan cannot be considered effective in terms of the NPPF and is therefore still "Unsound".

MM 21 (Phasing of construction)

In the early phases of the plan there is a disproportionate volume of housing proposed for either side of the Knowle Road; this is contradictory to the notion that Welborne is "South facing" and will establish vehicle movement patterns, in advance of the questionable highways improvements, which will subsequently prove difficult to break.

The Knowle Road, designed to serve traffic in and out of Knowle with no future demand considerations is undulating and twisty with difficult visual sightlines. The developers plan would appear to be to take the easiest 'get rich quick' option to build the first housing phases to the north of the site and in effect 'poach' this road putting undue stress along it with associated safety concerns on a piece of unsuitable infrastructure, all exiting at a busy roundabout on the A32 ! Correct me if I have got this wrong?

Deferral of the main internal spine road network until some point in Main Phase III (2022 – 2026) is viewed with particular concern, as by 2022 full functionality should have been provided by M27/J10, temporarily and some more permanently forcing all traffic onto the existing A32. See MM 12/13/14 above. Again considering these unacceptable influences on traffic flows, safety and peoples quality of life, I contest that the Plan cannot be considered effective in terms of the NPPF and is therefore still "Unsound".

Summary: Collectively reviewing all the downsides of putting a development of ~ 6,000 new homes and businesses on a sloping site, downwind of a motorway, trying to flow in with an already congested and stressed road system with unspecified and uncertain wastewater options is not **sound**. In fact the Welborne 'Plan' is not a sound plan but a 'collection of ideas and aspirations' researched to some extent, many not even proven or costed in the hope that if the Plan is approved, the developers will try to muddle through and tackle them one by one in the hope that having started the building and construction there will be 'no way back' and less than ideal or acceptable solutions will be able to get planning approval. The losers will be the environment, the people living in Welborne and those living in all the surrounding communities. If ever there was not a good idea, this is one!

Thank you.