

Local Plan Part 3: The Welborne Plan

Council Response to the Representations on the Main Modifications to the Welborne Plan (Submission Version)

March 2015

CD-52

Introduction

Representations were invited on post-hearing Main Modifications to the Welborne Plan between 26 January 2015 and 9 March 2015. A total of 77 representors submitted a response to the consultation. This document summarises the representations received and indicates the Council's response to them.

The Council's summaries provide an overview of the representations and reference should be made to the original representations for full details. All representations, along with the modifications, can be viewed at <u>www.fareham.gov.uk/welborneplanmodifications</u> and have been sent to the Inspector, in their original, as received versions, for consideration in his Examination of the Welborne Plan.

A number of representations were also received which did not relate to any of the Main Modifications or which related to the Minor Modifications which were also published for consultation. The original representations are also available at www.fareham.gov.uk/welborneplanmodifications.

Main Modification	Plan Ref	Summary of Representations received	Fareham Borough Council Response	
MM1	Page 8 - Paragraph 1.29	Questions over what mechanisms are in place to ensure that progress against the specified timetable will be maintained.	The Council identified a commitment to reviewing the Local Plan through a revision to its Local Development Scheme in	
		Uncertainty over PUSH's involvement in the review, and its role as a non-democratic / non-accountable organisation.	September 2014. This commitment and approach was reflected in the Welborne Plan and has been subsequently identified as a required modification by the Inspector.	
		Housing figure for Welborne, developed through PUSH work, is far too large to meet the needs of Fareham alone.	PUSH's revision of the South Hampshire Strategy will provide a development strategy for the PUSH region, which	
		Amalgamation of the Core Strategy (LP1), Development Sites and Policies Plan (LP2) and the Welborne Plan (LP3)	will be reflected through each of the PUSH authorities Local Plans.	
		into one plan through the Local Plan Review, questions the Council's approach and would make both LP2 and LP3 unsound.	The information and conclusions which will follow from the PUSH approach will enable the Council to assess an Objectively Assessed Need for Housing development in	
		Decision on Welborne Plan should be paused until Local Plan Review has been completed in 2018.	Fareham – the approach required by the National Planning Policy Framework (NPPF).	
		Commitment to the early review of the existing Local Plan to form one Local Plan Review document is welcomed.		
MM2	Page 20 - Policy WEL2; 1 st bullet &	Concerns over impacts of traffic on both the local and strategic road network and that more traffic will head north from Welborne than indicated by the traffic modelling.	It is not considered appropriate to use specific measures to direct traffic movements to the south. Welborne's location and mixture of uses will determine the relative attractiveness	
	6 th bullet	Winchester City Council (WCC) considered the Modification	of destinations for traffic leaving Welborne.	
		•	be designed to ensure traffic movements are directed southwards rather than northwards. Phasing is also	The Borough Council, in consultation with the Highway Authority, is of the opinion that additional amendments to limit north-bound movements are not necessary, as the measures are not considered essential to deliver the
		The Standing Conference suggest wording on requiring the Transport Assessment to include options for traffic management within Welborne and along the A32 to deliver a 90:10 split of traffic leaving Welborne heading south.	desired effect of encouraging vehicular movements to the south, or desirable, as their implementation will unnecessarily restrict movements around and from the new community.	
		Others considered the modification raised issues regarding whether Welborne is a part of Fareham or a separate new community, with some making reference to the size of	The Council's positon regarding infrastructure provision for early stages is set out in Chapter 10 and throughout the Plan.	
		settlement buffers.	It is considered that policy WEL2, as amended by Main	

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		Uncertainty over J10 design, funding and delivery will lead to problems south of Welborne.	Modification 2, properly reflects the relationship between Welborne and Fareham to the south.
		Points regarding the design of Junction 10 and associated road improvements, deliverability of BRT, provision of a rail halt at Knowle.	The Welborne Plan Examination Library includes an extensive transport modelling evidence base. This modelling has informed the assessment of traffic impacts
		Reference was made to statements that 500 homes could be delivered at Welborne without infrastructure.	and identification of areas likely to require mitigation as set out in the Transport Strategy and Chapter 7 of the Welborne Plan, which has been prepared in consultation with the Highway Authority.
ММЗ	Page 38-39, Policy WEL5	The proposed 50m buffer at Knowle and Funtley is inadequate to prevent the coalescence with Welborne.	These representations reiterate points that have previously been raised, and introduce no new matters/evidence, with
		Various respondents put forward the view that the buffer should be at least 100m, 200m or 500m.	the exception of the allegation that the Council has put out misleading information in respect of the site levels.
		The buffer should be measured from property boundaries and not from building to building.	The illustrations contained within Appendix 2 of the document CD-38 have been prepared to illustrate the
		Strategic Gaps in the Borough are significantly wider than 50m.	Council's position regarding whether the settlement buffers set out in the Welborne Plan are appropriate. The diagrams were prepared by the Council's masterplanning consultants
		The illustrations accompanying the proposed modifications are inaccurate and underplay the extent of the existing upwards slope from Funtley to Welborne.	LDA, drawing upon typographical information drawn from the Ordnance Survey 5m contours. This represents the best information available regarding the layout of the site and is
		Winchester City Council has requested that the northern buffer be extended to exclude all the land to the north above the 50m contour.	consistent with the observed typography on site. Policy WEL5, as amended, and paragraphs 3.58 to 3.71 of the supporting text in the Welborne Plan set out in detail
		The Joint Promoters consider that 50m is adequate in all circumstances and that the proposed modifications are unnecessary, and overly onerous.	each of the settlement buffer areas and what factors will be considered when assessing future planning applications for Welborne. The minimum widths set out in the policy are only one of those factors. Taken together, the Council considers the policy and supporting text provide an appropriate framework to achieve the aims of maintaining settlement separation.

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MM4	Pages 44-45,	Agreement to modification.	Comprehensive noise, light pollution and air qualit
	Policy WEL6	Modification should ensure that the impacts on surrounding communities are considered, as well as Welborne.	assessments are required to support any future plannin application for Welborne. These technical assessment would need to measure the current background conditions
		Noise, light pollution and air quality data should be collected at Welborne and in surrounding communities in order to provide a baseline against which development proposals can take account of through appropriate mitigation and be regularly measured against through monitoring. Plan should be specific on the monitoring measures and frequencies and include robust planning obligations to ensure effects are fully mitigated.	model anticipated future conditions as Welborne developed and identify the mitigation measures that we ensure that the impacts on both Welborne and surroundi communities are kept below specified limits. The delivery the required mitigation would be specified through the planning permission and secured financially through section 106 legal agreement.
		Enhancement of junction 10 will likely create air pollution to build up around the low lying areas of site, whilst the new westbound on-slip will rise along a lengthy gradient, further exacerbating noise and exhaust emissions.	
		A commitment to dimming street lights after midnight should be required.	
		Concern over whether mitigation measures will be delivered and enforced.	
		Concern that prevailing winds will transport high concentrations of exhaust fumes, particulates and dust over Welborne and the surrounding area, causing long term health impacts.	
		Concern over the impact of background noise arising from the M27 on future Welborne residents. Concern over Welborne exacerbating light pollution across the Portsmouth – Southampton sub-region.	
		Modification should include the requirement for mature trees to be planted in the settlement buffer between Welborne and Funtley in order to help reduce the effect of noise, light and poor air quality on Funtley residents.	

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MM5	Pages 44-45,	Policy lacking in detail – remains aspirational only.	Purpose of policy is to provide guidance and list any
	Policy WEL6	Plan should include more detail on road safety and also prioritise pedestrian and cyclist movement to Fareham and	requirements that must be met in detail as part of a future planning application for Welborne.
		Wickham.	All crossing solutions of the A32 should have pedestrian/cyclist safety as the most important
		Quantity of pedestrian/cycle crossings could impact on traffic flow on A32.	consideration; however the impact of crossings on traffic flow is an important consideration that must be looked at by
		Support for modification and emphasis on securing safe crossings on the A32.	the applicant.
MM6	Pages 46-47, Policy WEL7	The community should be given a stronger role in preparing and implementing the Strategic Design Codes.	There will be extensive consultations and community involvement in the preparation of the Strategic Design
		Concern that there will be different interpretations of the character areas depending on who prepares the Strategic	Codes. The policy as worded will ensure consistency across the site together with frequent reviews.
		Design Code, the policy should be amended to require the site promoters to prepare a single code for the whole site.	There is no reference in the policy or supporting text to proposals being 'broadly' in accordance with.
		It is essential that the Strategic Design Codes are frequently and flexibly reviewed to ensure design consistency throughout the development period.	
		Objections have been raised to the alleged inclusion of the word ' <i>broadly'</i> in accordance with into policy WEL7, as this is too open to interpretation.	
MM7	Page 54, Paragraph 5.17	With the current vacancy rates there is no justification for additional office/employment floorspace.	These responses largely reiterate issues raised earlier.
		Additional floorspace will not increase the level of self- containment as recruitment will be from outside the area. This will add to commuting problems.	
		The early provision of office floorspace will increase traffic; therefore the highways infrastructure must be in place first.	
		Several respondents welcome or support the proposed modification.	

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MM8	Page 61, Policy WEL10 -	The retail evidence which supports these policies is outdated.	The policy modification requires up to date impact assessments to ensure the correct level of new retail and
	6 th paragraph; and Page 63, Policy WEL11 - 4 th paragraph	The policies still do not describe the relationship between the new centres and Fareham and Wickham, the development of Welborne will have a significant impact on the facilities in Wickham regardless of the outcome of any impact study. Likewise Fareham town centre already has significant numbers of vacant properties.	leisure is provided, to serve the needs of Welborne without causing undue detriment to the adjoining centres.
		The new facilities will also have to successfully compete with other retail/leisure facilities in the area, if the aim of self- containment is to be achieved.	
		The current hierarchy of centres and how the assessment will be undertaken should be made clearer in the policies.	
		Leisure facilities including a swimming pool should be considered for these centres.	
MM9	Page 74, Policy WEL16	Support for the allocation of a single site for the secondary school adjacent to the new Welborne district centre.	Specific delivery of the secondary school at Welborne will be agreed with the Local Education Authority, Hampshire
		Uncertainty over delivery timeframe and funding – needs to be completed prior to 2026 as local school capacity in Fareham not evidenced.	County Council. The trigger for delivery is the point at which the school becomes both economic and feasible. This is expected to be in 2026 when 50% of the anticipated site demand (925 places) is reached (Table 4.1 in EV29).
		Clarification required over development status of Knowle Triangle.	Capacity at existing secondary schools in Fareham is detailed in evidence document HCC03.
		'Late' delivery of secondary school will increase 'school rat- running' journeys from Welborne through existing communities to Fareham schools.	
		Location should be more central and away from the A32.	
MM10	Page 81, Policy WEL18	Uncertainty over the delivery rate and delivery mechanism for affordable homes.	National Planning Policy Framework (para. 173) requires viability to be considered in the delivery of various policy
		Concern that the shortfall in each phase may never be made up and for the viability clauses which appear to reduce the	requirements, such as affordable housing, to ensure that the overall ability to be developed is not threatened.

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		requirement for the delivery of affordable housing.	All viability assessments that are submitted in support of
		Proof of viability needs to be transparent in order to avoid manipulation of figures. Needs to be an independent assessment of viability proposals to ensure objectivity.	planning applications at Welborne must be robust and transparent to enable the Council to make an informed and balanced planning decision that achieves the best development possible.
		Early phases are unlikely to meet the 30% target and will likely have reduced proportions of affordable housing due to high, early infrastructure costs, with higher proportions coming in later phases and leading to social imbalance.	Any development on the site would need to demonstrate how higher proportions of affordable housing could be delivered spatially as opposed to provision in localised area, in order to ensure that socially mixed and balanced
		High densities of low cost affordable housing could lead to impacts on garden community concept and the isolation of certain groups in the community.	communities are delivered in accordance with paragraph 6.22 of the Welborne Plan.
		Proportion of affordable housing (including social rented) should be set at 40% with no deferral or reduction possible. 30% affordable housing target as set in Core Strategy should not be allowed to drop purely on viability issues.	The Council has produced a draft Supplementary Planning Document called "Welborne Planning Obligations and Affordable Housing" which explains how affordable housing shall be delivered at Welborne.
		Support for policy modifications.	
MM11	 Policy WEL23 - development which is southward facing in transport terms Concern over uncertainties in funding and detailed transport impacts. Concern over impacts of traffic in north Fareham is the new community is southwards facing in transport terms or north of Welborne if the new community is not. Winchester City Council and others seek a furthe amendment to include design, phasing and management measures to secure a development which is southward facing in transport terms. The Standing Conference proposes an additional clause requiring development proposals to demonstrate how free 	licy WEL23 - development which is southward facing in transport terms.	Concerns over traffic impacts are noted, this issue was addressed at the Examination hearings.
		impacts. Concern over impacts of traffic in north Fareham if the new community is southwards facing in transport terms,	The Council considers that the primary driver for the anticipated movement patterns to and from Welborne is the relationship with and proximity to Fareham Town and the major communications links, in particular the M27.
		Winchester City Council and others seek a further amendment to include design, phasing and management measures to secure a development which is southward facing in transport terms.	Given that, in consultation with the Highway Authority, the Council considers that further amendments are not appropriate or necessary to achieve a development which is south facing in transport terms. Nor is it considered
		The Standing Conference proposes an additional clause requiring development proposals to demonstrate how freer	appropriate for the policy to include reference to Managed Motorways.
		flowing traffic on the M27 through Managed Motorways is achieved.	It is considered that the Plan is sufficiently clear that masterplan in this context refers to any subsequent
		Uncertain whether masterplan refers to the layout in the	masterplan submitted as part of the application process.

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		Plan or in the subsequent planning application.	The Welborne Plan Examination Library includes an extensive transport modelling evidence base. This modelling has informed the assessment of traffic impacts and identification of areas likely to require mitigation as set out in the Transport Strategy and Chapter 7 of the Welborne Plan, which has been prepared in consultation with the Highway Authority.
MM12	Page 94, Paragraph 7.24 - 1 st sentence	This change shows proposals are immature.	This change provides flexibility as to the number of junctions with the A32 which is appropriate at this stage.
MM13	Pages 94-95, Paragraph 7.27 – list item 1	ph 7.27 more traffic will head north than envisaged by the traffic	Modification has been made to provide clarification on the likely traffic management measures at this location. Concerns over traffic impacts are noted but this issue has already been addressed at the Examination.
		should be published in a simple form so that residents can provide informed comments. WCC has proposed a further change to indicate traffic	The Council is not convinced that the amendment proposed by WCC is necessary but notes that the Highway Authority would be content with the proposed amendment.
		measures may be required on other roads in Wickham and elsewhere on the A32 and A334.	Suggested requirement for Transport Assessment to specify distribution is not considered appropriate or necessary.
		Some expressed doubt as to the effectiveness in traff measures (which are sometimes short-term) in encouragin north bound journeys. More clarity over likely traff measures sought.	The Highway Authority has indicated that the local road mitigation measures will be agreed following consultation with local communities. This approach is set out in document CD-40.
		The Standing Conference suggested an amendment to specify that the forthcoming Transport Assessment should include measures to deliver a 90:10 south:north flowing distribution of traffic leaving Welborne.	The Welborne Plan Examination Library includes an extensive transport modelling evidence base. This modelling has informed the assessment of traffic impacts and identification of areas likely to require mitigation as set
		Others highlighted the importance of the A32 as a north bound route to destinations beyond Wickham.	out in the Transport Strategy and Chapter 7 of the Welborne Plan, which has been prepared in consultation with the
		It was queried what was meant by "locally agreed".	Highway Authority.

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MM14	Page 97, Policy WEL25 - 1 st sentence	Concern over lack of clarity and deliverability of access to the south, including Junction 10 of the M27.	Concerns over traffic impacts are noted but this issue has already been addressed at the Examination.
		Concerns whether amendment will be sufficient to deliver a development which is southward facing in transport terms. Concern over uncertainties in funding and detailed transport impacts. Concern over impacts in north Fareham if the new community is southwards facing in transport terms, or north of Welborne if the new community is not.	The Council considers that the primary driver for the anticipated movement patterns to and from Welborne is the relationship with and proximity to Fareham Town and the major communications links, in particular the M27. There are no proposals for any through routes for private
		Concern over lack of detailed transport assessment.	vehicles through Knowle. Therefore the Council, in
		Concern over impact upon M27.	consultation with the Highway Authority, does not consider it likely that traffic measures will be required in Knowle.
		Winchester City Council and others consider that Knowle should be added to the list at bullet point iv.	The Welborne Plan Examination Library includes an
		Concern phasing of development will undermine the amended policy.	extensive transport modelling evidence base. This modelling has informed the assessment of traffic impacts and identification of areas likely to require mitigation as set out in the Transport Strategy and Chapter 7 of the Welborne Plan, which has been prepared in consultation with the Highway Authority.
MM15	Page 106, Policy WEL29 - table	Not enough allotment space is provided which is against garden city principles and does not take into account local demand or health and well-being.	Allotment provision figure is consistent with the Council's Allotment Strategy which is the standard used throughout the Borough.
		town principles, or with the national demand shortage. Greater number of allotments would help mitigate loss	Level of provision not in alignment with garden city/ eco- town principles, or with the national demand shortage. Greater number of allotments would help mitigate loss of agricultural land.
		Uncertainty as to where allotments will be located. Request	The Council's Allotment Strategy commits to the provision of both access paths and where possible, parking.
		that allotments be positioned north of Funtley, adjacent to settlement buffer in order to strengthen separation.	The provision figure shown in the table is the allotment space required per 1000 population and not the total
		Standard assumes a smaller plot size and does not allow for plot separation paths or parking. Standard should be based	allotment provision.

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		on a larger plot size and allow for paths and parking resulting in an increased standard of 0.30 ha per 1000 population.	
		Agreement with modification.	
MM16	Page 114,	Wider landscape buffer required along northern boundary.	The scale of development at Welborne will have an impact
	Policy WEL33	Concern over the lack of detail presented in the policy as to what landscaping could be implemented in order to protect the views.	on the landscape. However, the purpose of policy WEL33 and the modifications to it aim to ensure that any landscape impacts are suitably addressed and appropriately mitigated.
		Due to the site's slope it is difficult to envisage how structural planting would be able to protect the sensitive landscape from higher elevations such as Portsdown Hill and Kiln Road.	The purpose of the modification is to strengthen the northern, eastern and southern landscape buffers. Structural landscaping scheme(s) for Welborne will be expected to show how landscaping will be of appropriate scale and strength to screen employment development.
		Planting and landscaping schemes should be designed to the concept of a garden community and must take account of the topography of the settlement buffers.	Neighbouring local authorities, including the South Downs National Park Authority, will be consulted on structural landscaping proposals in support of planning applications
		Visual impact of industrial developments should be screened through imaginative, strong planting and landscaping of sufficient scale to mitigate impacts when viewed from north Fareham.	for Welborne. Appropriate protection and enhancement of the historic environment at Welborne, which responds to the requests of English Heritage, is provided through policy WEL8.
		Landscaping structuring strategy not based on proportionate evidence and fails to add any clarification or guidance, whilst the suggestion that mature trees will form part of the landscaping strategy is unrealistic.	In addition to policy WEL33, policy WEL34 provides the requirement for detailed landscaping proposals at Welborne. These proposals require schemes to reflect garden city principles and also show how existing landscape
		Modification should be far more precise and should be more specific in its treatment of the historic parkland at Roche Court and of the eastern site boundary, where a 50m landscape belt should be defined.	features on the site will be incorporated.
		Structural landscaping measures should take close distance views into account as well as long distance and should apply from all viewing points, not just Portsdown Hill.	

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		All views will be lost if development takes place.	
		Support for modification.	
MM17	Page 117, Policy WEL36	Higher energy efficiency standards should be sought, including a greater than 10% proportion of passivhaus.	Following the imminent withdrawal of the Code for Sustainable Homes, energy efficient standards for buildings will be managed through Building Regulations.
		Policy includes too many viability caveats.	The proportion of passivhaus is set at a level that is attainable for the development. The viability caveats are required in order for the policy to meet the viability requirements of the National Planning Policy Framework (NPPF).
MM18	Page 120, Policy WEL37	Concern over the lack of additional clarity/ detail (location, timeframes, funding & viability) regarding the provision of both water supply and waste water infrastructure for Welborne.	Due to a de-regulated market, the choice of both water supply and wastewater disposal are commercial decisions to be made by the site developers and to show a preference for a particular solution for either water
		Request for independent assessment of proposed delivery and viability of waste water infrastructure.	supply or wastewater disposal could be commercially disadvantageous. However, evidence supporting the
		Concern that the waste water solution may affect the flows of either the River Meon or Wallington and cause subsequent flooding impacts.	Welborne Plan shows a number of solutions that developers can rely upon to deliver the necessary infrastructure within the required development timeframe/phasing.
		Uncertainty as to when information to support a planning application is required. Planning application stage is too late for the waste water solution to be identified.	The Environment Agency is a statutory consultee for planning applications and will therefore be fully consulted on all aspects of the development which may impact
		Objection to the potential for Crockerhill residents to be connected to the mains sewerage network.	surface water or groundwater.
MM19	Page 123, Policy WEL39	No evidence in the Welborne Plan that downstream flood risk can be mitigated and protect the communities in Funtley and north Fareham and therefore the amendment does not address the public concern for flooding.	Fareham Borough Council has an agreed position statement with the Environment Agency regarding flooding and Sustainable Drainage Systems (SuDS) at Welborne. Furthermore the Welborne Plan has been informed by the
		Concern that existing flood risk issues will be exacerbated	PUSH Strategic Flood Risk Assessment (LD01).

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		and are being deferred to the planning application stage.	The recent ministerial statement (HCWS161) on
		All planning application documentation must be available for public consultation and not subject to confidentiality.	Sustainable drainage systems (ND16) is in accordance with the position of the Welborne Plan in requiring SuDS for such large scale development. The ministerial statement also
		Concern that the requirement for drainage to meet a 1 in a 100 year rainfall event is not exact or stringent enough (due to climate change) and must include all roads, pavements, driveways and roofs. Need to resolve flooding	reaffirms the policy stipulation that the SuDS design must be agreed with SuDS adoption body - currently the Lead Local Flood Authority. The requirement for the Welborne SuDS to be designed to
		beneath junction 10, as impacts on traffic on the A32.	manage a 1% probability event (1 in 100 year) plus an
		Concern over funding for flood management/ SuDS.	additional 30% capacity allowance for climate change exceeds the requirements which are proposed by the draft
		Recommend that a Drainage and Flood Risk Assessment is undertaken as a pre-requisite to approving the 'Plan'.	National Standards for SuDS. Furthermore this position has been agreed with the Environment Agency, who will be a
		Request for independent assessment of delivery and viability of flood management/ SuDS infrastructure.	statutory consultee on any planning application.
MM20	Page 125, Policy WEL40	Support for modification.	The modification reflects the required timing for the delivery
		Additional clarity required for the location of, and funding for, the Household Waste Recycling Centre (HWRC).	of the HWRC by Hampshire County Council when cross- referenced with the site promoters' anticipated development sequencing and phasing for the site (CD-36).
		Objection to modification – policy should retain flexibility for the location of the HWRC.	The funding arrangements for the HWRC are as set out in the HWRC Briefing Note (EV24).
		HWRC should be delivered before 1000 households are built – as this will have cause traffic to increase through Funtley to access the existing Segensworth HWRC.	Appropriate highway mitigation measures to discourage 'rat- running' on inappropriate residential roads through Funtley will be implemented as required.
MM21	Page 126-129, Paragraphs 10.6 – 10.23; and	Objections that development in vicinity of Knowle Road in early phases will not reinforce a south-facing community. One party thought that housing and employment east of A32	Concerns over capacity of existing infrastructure, and desire to see infrastructure brought forward early, are noted but these issues have already been addressed at the
	Page 133,	should be brought forward earlier.	Examination. No objection has been received from any
	Policy WEL41	0	service provider to the infrastructure requirements and timescales set out in this phasing plan.
		the development. Benefits include reducing the need to travel, including the impacts of construction traffic. Calls for	The exact timescale for the delivery of key outcomes and critical infrastructure will be determined through the planning

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		 more detail and certainty over funding. Calls for upgrade of J10 to be completed earlier. Concerns over capacity of existing infrastructure to serve early phases of development. Concerns Council is considering bringing forward 500 dwellings without any infrastructure. One respondent pointed out differences between Examination Document CD36 and the Proposed Modification MM21. Calls for additional infrastructure to be identified – Church, cemetery, crematorium, rail halt, and older persons and supported housing. Winchester City Council wishes to see a phasing plan diagram for Welborne. Fareham Society sought greater clarity, possibly in the form of a chart based on that in Appendix 1 to CD36. One respondent commented that one can only exit the motorway at junction 10. Concern over engagement with health care providers and that FBC have neither sought nor received any assurances that Queen Alexandra Hospital can cope. 	 application process and associated documents, including section 106 planning agreements. In the meantime, the phasing plan set out in paragraphs 10.6 to 10.23 serves as a guide of the Council's expectations. Significant infrastructure will be required before any dwellings are delivered at Welborne. Following the production of the document CD-36 for the Welborne Plan Examination, the Council has refined the Phasing Plan in consultation with service providers and is content that the text set out in MM21 provides the best guidance available at present as to how the development is likely to proceed. For clarification, one can also join the M27 at Junction 10, eastbound only. The Borough Council's engagement with health service providers, including Portsmouth Hospitals NHS Trust, is set out in Examination document CD-39. The Phasing Plan states that sufficient SANGS will have to be delivered in the first and subsequent phases prior to residential development. This is considered sufficiently clear that it will be required in Phase 1 and in the phases following phase 1.
		Natural England request that for clarity, that reference to SANGs should be positioned in the Local Plan in such a way that it is clear that it covers all the phases, and not only referred to in phase 1.	
MM22	Page 133, Policy WEL41	 General support, with some concern that paragraphs 10.36 to 10.41 remain and should be removed. Other comments regarding existing wording – concerning the capacity of existing infrastructure, and that infrastructure should be in place prior to development. 	Paragraphs 10.36 to 10.41 are removed by minor modification AM57.

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MM23	Pages 138, Paragraphs 11.5 - 11.6	Request all facts relating to viability, and the monitoring and review processes and mechanisms of the Welborne project to go into the public domain.	The mechanism set out in the proposed amendments to paragraphs 11.5 and 11.6 is considered to be a pragmatic approach to delivering a project as complex as Welborne.
		Calls for the Strategic Delivery Group to include independent representation.	The Council has undertaken in paragraph 11.5 to ensure that a Delivery Risk Register is created and forms part of the Council's Authority Monitoring Report for publication on an annual basis, and in addition, any change to be reported to the Welborne Standing Conference.
		Requests for additional information on viability and risks to delivery.	
		Concerns the process described is too slow.	The Standing Conference suggestion regarding Quality of Life Indicators is noted. Paragraph 11.12 of the Plan already acknowledges that indicators and targets will be developed over the life of the project, and it is envisaged that Quality of Life indicators will be a part of that.
		Monitoring and review needs to be with a democratically accountable body.	
		Other instances where developments have not adhered to the Plan.	
		Plan should contain conditions ensuring that phases to not proceed ahead of infrastructure, and infrastructure should be given a tighter definition.	
		The Standing Conference propose an amendment setting out how planning agreements and planning conditions will be used to secure infrastructure in a timely manner.	
		The Standing Conference also suggest a note setting out how quality of life indicators will be developed and utilised alongside the planning outcomes.	
		Requests for a risk register for the project to be prepared an made public.	
		More information sought on viability.	
		Request for explicit mention of the use of performance standards to ensure developers are required to successfully implement the Plan and mitigate impacts effectively.	