

Mr Shaun Cunningham



16th February 2015

Dear Mr Hogger

My submission to you on the proposed amendments to the main modifications (MM-1 to MM-23) with regard to the Welborne Plan.

My thoughts are:

MM1

Policy

Par: Para 1.29

Modification

Commitment to a Review of the Local Plan

To meet Soundness Criteria

Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in the Framework

Submission

Where's the evidence and mechanisms to support the council actions and the time frame Fareham Borough Council have layout to you? Time table without mechanisms to support it is worthless. I have little confidence the council will meet the their own time frame – wish to see further commitments to prop up and shore up the time table thus protecting the public interest. Past History of Fareham Council is not a good one with regards to meeting time frames of local plans

Fails to meet Soundness Criteria due to lack of supporting mechanisms in supporting the time frame

UNSOUND

MM-1

Supporting thoughts

Partnership for Urban South Hampshire (Push) is way off the resident's radar. Who are PUSH and in whose name do they generate and create growth plans which are having such a major impact on the lives of resident's from right across the Fareham and Portsmouth region?

Have the residents of Fareham endorsed such plans? Can Fareham Borough Council show in all honesty residents support the growth plans created by local politicians who treat the democratic process as an afterthought.

Are the Strategic Housing Market Assessment (SHMA) ever challenged or are they merely endorsed because they paint the identical picture PUSH is promoting?

Of course we should all welcome a review of the Welborne Plan and equally welcome the published time frame for doing so. However a time frame without a mechanism to ensure and guarantee the integrity of the time line is worthless and one only needs to look at historic evidence to see Fareham Borough Council have a habit in not fulfilling promises. Evidence heard at the public hearings on part 2 of the Fareham Plan demonstrates and shows there are still issues flagged by a previous inspector which even today remain unfilled.

One could argue the time frame is cosmetic and one does have a right to ask the question which is so important , what is underpinning mechanism for this review.

The Welborne Plan is not even adopted yet and we are being told a consultation draft will be ready for the summer of 2016. Have Fareham Borough Council commenced the process of the review and what evidence can they provide to support such actions , and if they haven't what hope is there a draft plan will actually be ready for the summer of 2016.

Let's us be clear any slippage in any of the periods within the time frame will have a accumulate effect which could stretch the review of the plan to some distance horizon. We have a time frame; now let us see the mechanisms which will put in place to guarantee the integrity of the process.

MM2

Policy
WEL2

Modification

New first bullet point and amendment to the 6th bullet point (4th sub-bullet) in relation to emphasising the relationship between Welborne and Fareham to the south

To meet Soundness Criteria

Justified – the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence

Modification

New first bullet point and amendment to the 6th bullet point (4th sub-bullet) in relation to emphasising the relationship between Welborne and Fareham to the south

Submission

Fails to meet the soundness criteria on a number of points. Consider Wel 2 to be unsound even with the above modification. Self-Containment which is one of the core values of Welborne is now completely discredited, merely a label of hope.

Today (13 February 2015) I contacted Fareham Council and the Highways Agency and asked about the funding of J10 improvements and was told still not fully funded or designed. Those issues will be dealt with at the planning stage. This is not good enough. J-10 is critical to Welborne because without it the quality of life for local residents will become nightmare. The Council is presently considering bringing forward 500 homes at Welborne before any infrastructure is in place which would be a planned disaster

Council have failed to demonstrate how the multitude of problems a south facing Welborne would create can or will be tackled.

UNSOUND

MM-3

Policy
WEL-5

Modification

Clarification regarding consideration of settlement buffers

To meet Soundness Criteria

Justified – the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence

Submission

This amendment fails to deliver the clarity asked for and simply introduces more confusion. The council's response to the community on the matter of the buffer zones is nothing short than woeful.

Unsound – Separation of communities cannot be delivered in the way the council are setting out. One can walk 50 metres in less than 1 min. Separation cannot be realistically achieved using a 50 metre bench mark. Time the Council listened to the community.

MM-3 cannot be allowed to stand due to a conflict of evidence set out in CD-38 with regard to the nature of the landscape which has not fully been taken into account with reference to Funtley . MM-3 cannot be justified due to incomplete or inaccurate evidence within CD-38

I ask this question, have the Council listen to the Local communities over a number of years? The answer is NO.

MM-4

Policy
WEL-6

Modification

Add a criterion relating to noise, light pollution and air quality

To meet Soundness Criteria

Justified – the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence

Submission

To meet the soundness criteria there should be measures put in place to measure and document present levels of air quality not only at the Welborne site but neighbouring areas (North Fareham especially) which will be affected by a large increase in traffic volumes. MM-4 should be strengthened to reflect that today's levels should be used as a bench mark

MM-5

Policy
WEL-6

Modification

Take measures to ease pedestrian/cycle movement across the A32

To meet Soundness Criteria

Justified – the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence

Submission

Where is the detail to support the amendment. Again all we see is an aspiration. Yes very applaudable but the big question remains unsettled with no plausible proposal in how this aspiration will be achieved. Are the public entitled to some insight into the councils deeper thinking .

Unsound – does not meet the Justified Criteria – due to lack of detail how this aspiration will be achieved.

MM-6

Policy

WEL-7

Modification

Clarification regarding strategic design codes

To meet Soundness Criteria

Justified – the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence

Submission

If the residents are to have Welborne imposed on them and for Welborne to become part of the landscape would it be thoughtful of the site promoters to allow residents to have a say in the design codes especially when Welborne will be set in a historic and archaeological rich environment?

MM-7

Policy

Para 5.17

Modification

Clarification regarding the Council's approach towards office development

To meet Soundness Criteria

Justified – the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence

Submission

Where's the evidence to support the need for office development when there is a clear over capacity in the greater Fareham area. If the thought process is one of creating Self-

Containment within Welborne then this surely is a misconception due to the fact any business will recruit within a much larger area than Welborne. There are also traffic issues with HGV vehicles being of concern on the local road network before any infrastructure is in place.

Unsound – Not enough supporting evidence for the justification of office development at Welborne and therefore cannot be justified.

MM-8

Policy

WEL-10 & WEL-11

Modification

Clarification regarding Impact Assessments for retail and leisure development

To meet Soundness Criteria

Justified – the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence

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Submission

I would argue the council have their thought patterns the wrong way round. Surely the case will not be Welborne having an impact on the key shopping areas like Fareham, but such key and already established centres having an impact on any proposed retail centre at Welborne. The retail report the council refers to is one which could be said to be already out dated . Shopping habits are changing at a very fast rate. Welborne Centre needs to lean heavily towards leisure. Cllr Pam Bryant case for swimming facilities at Welborne was thoughtful . Such a facility would be beneficial for the new communityWhat happened to such a splendid idea?

Unsound – Council needs to review the issue of retail at Welborne and have much more understanding of the impact major established retail centres will have on Welborne Centre. Focus should be on leisure for the long term viability.

MM-9

Policy

WEL-16

Modification

Allocate a single site for a secondary school close to the District Centre

To meet Soundness Criteria

Justified – the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence

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Submission

The re-location of the school is clearly one of the big triumphs of the Welborne Public Hearings. However the opening time frame of the school is far too distant. The opening of the school needs to be much more towards the starting line of Welborne than the finishing line.

Other issues which I believe are woefully understated within the plan and have no attribute in how they are to be delivered and yet have a direct link to the establishment of the school. They all have statements within the plan which are incomprehensible to their delivery. The issues below all have direct links on the subject area of the school, the opening of the educational establishment or the school's impact on them.

Self- Containment

Traffic issues

Local school capacity outside of Welborne not been established or defined.

Unsound – The time frame for the secondary school is not acceptable. 2026 will in all probability be 2036 or more, mere promise. The time frame of the school needs to move forward.

MM-10

Policy

WEL-18

Modification

Clarification regarding affordable housing provision

To meet Soundness Criteria

Effective (deliverable over its period and based on effective joint working on cross-boundary strategic priorities)

Submission

The whole purpose of Welborne and the many promises made by the council is one of strong delivery with regard to affordable homes at Welborne. In fact it has been a key driver of the council in their pursuit of this development. Are we now going to abandon this major promise to the residents of Fareham. The developers have been given the biggest draft get out clause since the Magna Carta on the delivery of affordable homes at Welborne. They will have no resolve to deliver 20% affordable homes let alone 30% to 40%.

The amendment is an open door to a dismal delivery rate of affordable home at Welborne and the developers will take full advantage. One must seriously ask whether the amendment is Effective to deliver the required affordable homes Fareham Borough Council have continually recited is necessary to meet the housing needs of Fareham

Not Effective and therefore cannot be considered sound

MM-11

Policy
WEL-23

Modification
Promote development that looks to the south

To meet Soundness Criteria
Justified – the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence

Submission
This modification cannot be Justified in its present form and nor does the evidence support the case behind the modification. The modification is based on HOPE. Surely if there was ever a case for soundness whether in the funding or in the traffic computer modelling before this major development Welborne goes forward then this is the issue. This vision of looking to the South cannot be allowed to stand based merely on aspiration and promises. Residents have learnt in the last few weeks the council are considering bring forward 500 homes at Welborne without any infrastructure.....what a calamity and a planned one, what is the council thinking about, not the residents thats for sure. We need much more transparency in the funding and in the traffic data with such traffic data being real time and not some computer output, we cannot afford to mess these issue up.

Cannot be Justified in its present form – Unsound

MM-12

Policy
Para 7.24

Modification
Introduction of flexibility regarding access links to the A32

To meet Soundness Criteria
Justified – the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidenceImportant

Submission:

Not sure what the change actually does. The change certainly does not bring any more clarity or explicitness to the plan in fact it brings more woolliness to the scheme. What we need is much more clarity like a real time traffic study to bring essential understanding and may I say knowledge to the issues to be resolved. Do the council understand the issues? Please let us not have the line " the planning committee can sort it out"

This modification is not Justified due to a complete lack of clarity and therefore weak and inadequate and not fit for purpose

Unsound

MM-13

Policy

Para 7.27

Modification

Clarification regarding traffic management on the A32

To meet Soundness Criteria

Justified – the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence Important

Submission

My submission on this modification is covered on MM-12. Another example or illustration of the naivety of the Welborne plan. This modification does not add anything other than a little seasoning to an already bland Welborne Plan. The Plan is dull on how traffic management is to be encountered and this modification merely follows the same path.

Due to the complete lack of clarity I believe this modification does not meet the Justified criteria – Not Sound

MM-14

Policy

Wel-25

Modification

Clarification regarding principal access being from the south

To meet Soundness Criteria

Justified – the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence Important

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Submission

My submission on this modification is covered on MM-11.

This is yet another example or illustration of the naivety of the Welborne plan. This modification does not add anything.

Is J10 Fully funded?

Is J10 fully designed?

Are we really seriously thinking of embarking on Welborne when we have no guarantee on J10. The time frame for J10 is in fact just paper. We now know Fareham Borough Council are considering bring forward 500 homes at Welborne without J-10 even on the design board. How can that be right. Was this communicated at the public hearings? J10 is not just critical but pivotal in dealing with the monumental change in traffic flow not only at J10 but on the local road network. Time and time again I have asked the question is J10 fully funded. The answer is always NO. Its about time we had the evidence to support the dream

Due to the complete lack of clarity I believe this modification does not meet the Justified criteria – Not Sound

MM-15

Policy

Wel-29

Modification

Clarification regarding allotment provision

To meet Soundness Criteria – All Three below

Positively prepared: (based on a strategy that seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development)

Justified: the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence

Effective: (deliverable over its period and based on effective joint working on cross-boundary strategic priorities)

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Submission:

The modification clarifies the Council Position on allotment provision. 1000 acres of countryside taken for Welborne and allotment provision is Yes, a sorrowful 0.32 acres. When scaled to a Professional football pitch which is approximately 1.76 acres this provision is in the same class as the buffer zones and the separation of communities, inadequate and plainly lacking in GREEN values. I expect this figure is based on nothing other than the smallest figure the council believes it can get away with. Right across our area the interest in allotments is on the increase and waiting lists are there to be seen. From the figure within the modification we will have a waiting list before the first brick is laid at Welborne. Where is the vision?

We can do better than this. The figure of 0.13 is woeful. The council had to show all three soundness criteria are met, in my opinion not one has.
Unsound..... we can do better .

MM-16

Policy
WEL33 (as set out in CD-46)

Modification
Structural planting including the protection of long-distance views including from Portsdown Hill

To meet Soundness Criteria
Justified – the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidenceImportant

Submission
How about some additional information on how this will be achieved. Or are we back to the catch phrase " the planning committee can sort it " Sorry but I am getting tired of symbolic statements within the Welborne plan which supposedly address issues but in fact address nothing with any clarity.

Critical issues and this amendment is one of them are not supported with any evidence or hypothesis in how certain undertakings are going to be achieved. This amendment is brought forward to deal with a very important issue. The views from Portsdown Hill are wonderful and we can't leave them in the hands of planners in the hope they will find the solution later. It will be too late.

In fact CD-38 is incorrect on a major issues with regards to the lay of the land at Funtley. If the Council are unable to understand this issue what faith is there they understanding the big issue which this amendment deals with.
The amendment does nothing or says anything to give people the hope the council understand the issue in question.
Insufficient evidence to support the amendment and does not meet the Justified criteria

MM-17

Policy
WEL-36

Modification
Clarification regarding optimising energy efficiency

To meet Soundness Criteria

Positively prepared: (based on a strategy that seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development)

Justified: the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence

Effective: (deliverable over its period and based on effective joint working on cross-boundary strategic priorities)

Submission

This amendment does nothing for the delivery of high efficiency homes . I expect what we will end up with is Cavity Wall Foam – full stop.

What a dismal figure 10% of homes MAY be built to 'Passivhaus's Standard with an added clause to stop the developers getting too carried away

“unless it can be demonstrated to be unviable. by means of a financial assessment which clearly demonstrates the maximum proportion of dwellings built to Passivhaus Standard which can be achieved”

Meaning 10% is just one of spin. Passivhaus's Standard is not new, there's plenty of evidence out there to be had. Once again we can do better than this, where is the resolve to set the horizon higher, it can be done?

MM-18

Policy

WEL-37

Modification

Clarification regarding water efficiency, supply and disposal

To meet Soundness Criteria

Justified – the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidenceImportant

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Submission

Are we seriously suggesting Welborne should be approved and declared Sound before there is a full explanation on how waste water and sewage are going to be dealt with at Welborne. I would suggest the problem is far too technical and just too big to be left to the " planning committee ". There are only two real solutions and either one will mean major disruption and much inconvenience for Fareham residents. Presently we have two dots on a map – Welborne and Peel Common – that's all. Is that good enough?

Surely Fareham Residents are entitled to know how this project will be managed and how it will be executed. What will happen if Welborne commences and down the line the cost for this major piece of infrastructure becomes an issue or funding is moved to the right for what ever reason? The country is still presently in the grip of austerity and with more government departments and agencies coming under even more pressure with budget cuts after the election, were is the certainty of the funding. Are we really saying build a few thousand homes and then JUST stop and wait. What a nightmare that would be.

The modification does not provide the clarity which Fareham Residents demand and nor does it provide the necessary clarification in how waste water will be dealt with or how the necessary works will be completed. Therefore the modification does not meet the Soundness Criteria and cannot be seen to be Justified.

MM-19

Policy
WEL-39

Modification
Clarification regarding flood risk and sustainable drainage systems

To meet Soundness Criteria
Effective (deliverable over its period and based on effective joint working on cross-boundary strategic priorities)

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Submission
Again the modification fails to address the core issue. Another issue for the planning committee to sort out. Fareham Borough Council's Planning committee is heading to become a full time role with regard to Welborne. Speaking to members of that committee they said, it would helpful if we had guidance / direction within the Welborne Plan. Where is it?

Like so many other issues the council keep deferring components and their important elements to a later date in the hope the answer will be found down stream, hoping in this case any flooding risk will quietly disappear. What will happen on the onset of Welborne the flooding issue does become a reality. Down tools we have a problem?
This issue of the potential flooding risks downstream from Welborne needs evaluating and sorting NOW and measures put in place so residents have some confidence in the Welborne Plan.....Thats all they seek.....confidence.

I do not believe the amendment addresses the core issues and therefore is not Effective.

MM-20

Policy
WEL-40

Modification

Allocation of a site to the west of the A32 for a household waste collection centre

To meet Soundness Criteria

Effective (deliverable over its period and based on effective joint working on cross-boundary strategic priorities)

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Submission

One of the few success of the Welborne Public hearings – Fully support. I do note this new facility is larger than the space given over to allotments.

MM-21

Policy

WEL-41

Modification

New phasing plan

To meet Soundness Criteria

Effective (deliverable over its period and based on effective joint working on cross-boundary strategic priorities)

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Submission

- J10 – needs urgent clarification with regard to it's funding. 2022 is to late. In fact we have no guarantee 2022 is the actual date of delivery. Presently just figures on paper. There is also the news the council are considering bring forward 500 homes at Welborne without any infrastructure – crazy
- Secondary School needs to come forward to allow self-containment to become a reality and not just a label.
- We need to see Primary Care facilities much earlier in the phasing schedule . Local Health Care provision is under enormous strain now.
- Affordable Homes need to be in every phase at the level the council promised. 30% to 40%.
 - Related Traffic calming measures need to be pursued from the start line and not the finishing line. Residents deserve nothing less.
 - The Welborne centre should be more tuned to leisure then retail and the possibility of a swimming pool should be re-visited.
 - Any deferral of traffic measures would be catastrophe and must be delivered sooner than later. Traffic levels are moving in one direction-upwards.
 - The BRT – needs to come forward and not remain just an aspiration.

MM-22

Policy
WEL-41

Modification

Remove references to the deferral of infrastructure provision

To meet Soundness Criteria

Justified: the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence

Effective: (deliverable over its period and based on effective joint working on cross-boundary strategic priorities)

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Submission
No comment

MM-23

Policy
Para 11.5 and 11.6

Modification

Clarification regarding monitoring and review

To meet Soundness Criteria

Effective (deliverable over its period and based on effective joint working on cross-boundary strategic priorities)

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Submission

The key word here must be transparency. To date I haven't seen the key evidence to show Welborne is viable today let alone tomorrow. If we are to have clarity then let us begin with the transparency necessary to remove some of the secrecy surrounding much of evidence allegedly supporting the viability of Welborne. Residents have a right to see such evidence. Today 13 February I still could not obtain answer to the funding of Junction J10 M27.

Residents of Fareham should have FULL access to such data which supposedly shows Welborne is deliverable. Is Welborne deliverable over the short / medium / long term?

The public today does not have the information or access to it, WHY? Monitoring is critical but one needs to see the data to pass judgement. So until the council allows full disclosure of the viability data with regard to Welborne how can we the public have any confidence

the plan meets the soundness criteria - EFFECTIVE. Until such data is released then the plan cannot be considered EFFECTIVE.

Yours Sincerely

Mr S. Cunningham