

FAREHAM BOROUGH COUNCIL LOCAL PLAN Part 3

The Welborne Plan

Notice of Proposed Modifications

Introduction

Following the Examination in Public of the Welborne Plan, the Inspector raised 22 Main Modifications as result of his review of the plan. Subsequently, Fareham Borough Council has made modifications to the plan and these are now open to comment.

Please find below my comments on the changes proposed for Main Modifications MM2, MM3, MM4, MM10 and MM23

MM1 No Comment

MM2 Policy WEL 2

To emphasise the relationship between Welborne and Fareham to the south, and for grammatical clarity

The amendment to Policy WEL 2 apart from adding a new and superfluous opening statement to emphasise the relationship between Welborne and Fareham has done nothing to allay concerns expressed throughout the development of the Welborne Plan regarding the issue of access and the effect on the local road network.

The dependence upon the Bus Rapid Transit to “form a key component of the access strategy” is dependent upon a subsidy which is by no means assured at this time.

The plan also requires “*Carefully designed transport interventions will minimise the traffic impacts on the local and strategic road network and mitigate any environmental impacts;*”

No information has been forthcoming on what “interventions” will minimise the impact on an already overcrowded local road network - the late delivery of schools on the Welborne site will certainly become an issue regarding the additional traffic incurred unless (and highly unlikely) a subsidised bus service is provided to transport school children to and from school during term time.

Traffic heading south into Fareham from Welborne will have the choice of travelling south along the A32 Wickham Road; a road already congested with vehicles parked in the road adjacent to a row of houses, the occupants of which have no alternative parking space. The alternative to Wickham Road is to join the queue of vehicles on North Hill where movement is controlled by traffic lights at the junction with Kiln Road and Old Turnpike. Although the junction is controlled by “intelligent traffic lights” large queues invariably develop during the morning and evening rush hours.

Modification to this junction is constrained by the local topography and the presence of a listed building.

Most traffic coming south up North Hill turns into Kiln Road which then leads on to Highlands Road providing a feeder route into the residential areas of North Fareham and through to Funtley. Any incident or road works in Kiln Road or Highlands Road invariably creates traffic chaos in the surrounding local roads.

The environmental impact of the proposal to relocate and modify Junction 10 of the M27 has yet to be fully considered. Traffic travelling westwards from Welborne will pass under the existing motorway and will then have to proceed up a gradient to merge with the M27. In order to accommodate a mix of HGVs and cars, this gradient will require two lanes. This will consequently take a considerable amount of land from Fareham Common which is currently designated as part of the open space between North Fareham and Welborne and has been designated as a SINC.

Additionally, the noise and pollution created by HGVs negotiating the proposed westbound route from Welborne will have a definite environmental impact on the residents of Funtley and the three residential homes on Kiln Road that currently overlook the Common.

Without further information on the “transport interventions” mentioned in Policy WEL 2 it is not possible to determine if the Plan is sound with respect to this policy and consequently the plan remains unsound at this stage.

MM3 Policy WEL 5

To provide clarification on settlement buffers to decision-makers and applicants as to when a settlement buffer of more than 50 metres may be required.

Proposed in the Council's Further Actions Arising Statement CD-46.

The change to Policy Wel 5 made by the incorporation of the requirement to provide site sections through the respective settlement buffers and the somewhat confusing statement at new sub paragraph iii do little to address the original concerns regarding the proposed Settlement Buffer distance of 50 metres. It is not even clear in the changed text if the width of the settlement buffer is to be measured from the structure or the property boundary of existing buildings.

Chapter 3 “The Welborne site” clearly states at paragraph 3.64 that *“The Funtley buffer will be an important part of the green infrastructure for both Welborne and the residents of Funtley and it will provide suitable opportunities for recreation.”*

Even allowing for the existing open space to the north of Funtley that is outside the boundary of Welborne, the continued provision of a derisory 50 metre settlement buffer remains far from congruent with the vision of Welborne set out in chapter 2 of the original submission.

“A distinct new community set apart but connected to Fareham, whose spirit, character and form are inspired by its landscape setting. (Paragraph 2.4)

Socially and economically Welborne will complement rather than compete with the surrounding settlements and it will allow existing residents to benefit from the new

facilities." (Paragraph 2.10)

Until the distance between settlements is clearly matched to FBC's vision of Welborne set out in the submission document this modification to the plan cannot be justified and consequently the plan remains unsound.

MM4 Policy WEL 6: Noise, Light Pollution and Air Quality

To ensure noise, light pollution and air quality are considered in the design principles.

In order to achieve the "South Facing Development (Policy WEL 23) it is deemed necessary to resite Junction 10 in order to provide all directions access to the M27. From the limited amount of information available it is apparent that southbound vehicular traffic entering or leaving Welborne from the M27 will have to pass through Welborne in order to access the A32 into Fareham. This will invariably create an air pollution problem as the motorway access points will lay at the lowest point of the development. As the motorway embankment will act as a barrier to the south, on days when there is little air flow, polluted air will tend to build up around the low lying southern parts of the development.

Additionally, traffic joining the M27 in a westerly direction will have to climb a lengthy gradient before merging with the M27. Traffic, especially HGVs, climbing this gradient will emit most noise and exhaust pollution at this point and again, the low lying area around Funtley will suffer a considerable increase in air pollution when there is little air movement to dissipate the traffic exhaust emissions.

MM5 – MM9 No Comments

MM10 Policy Wel 18: Affordable Housing Provision

To remove reference of JVHC from policy and provide clearer guidance on Council's approach to delivering affordable housing.

Paragraph 6.30 of the Welborne Plan states that the provision of affordable housing will lie between an absolute lower limit of 10% and an upper limit of 40% in order to provide a reasonable balance between the need for flexibility and achieving the vision and objectives of the Welborne Plan.

Policy Wel18, as rewritten, sets out the initial requirement to meet the target of 30% affordable housing provision in each residential phase unless a robust and transparent viability appraisal proving this not to be possible is accepted by the Council.

Where it is agreed that a shortfall in the number of affordable homes will be accepted, the developer will be expected to make this up during subsequent phases.

In order to meet the higher infrastructure charges that will occur during the early phases of the plan, the developers will undoubtedly make a robust case to reduce the number of affordable houses on

the grounds of viability. Consequently the affordable housing will be delivered towards the later phases of the development and will be located in areas where the ratio of affordable homes to other housing will then become smaller. This in turn will lead to a degree of social imbalance in those areas of Welborne which will be completed towards the end of the plan.

This policy of “flexibility” will undoubtedly work in favour of the developers. Consequently, it is unlikely that the target of 30% affordable housing will be achieved. For this reason the plan remains unsound at this stage.

As the Welborne Plan has been promoted in order to provide much needed affordable housing in the borough, the issue of “viability” in the early part of the plan may well mitigate against this objective. For these reasons, the modification to the plan cannot be justified and the plan remains unsound.

MM11 – MM22 No Comments

MM23: Monitoring and Review

To reflect the Inspector’s concern that the Monitoring and Review section of the Plan should be made clearer, the Council has made significant modifications which set out the key elements of the monitoring and review mechanism for the project.

Risks to the timely delivery of key outcomes and critical infrastructure listed in the phasing plan will be reported as an entry in the delivery risk register at the time they are identified. (Paragraph 11.6) The review body will be the Strategic Group – a committee that has only met on three occasions since June 2013 and has no independent membership. This committee will eventually report changes to another body, the Welborne Standing Conference, which currently meets on an occasional basis. This slow process will invariably lead to situations where the developers will doubtless accuse the council of prevarication on important decisions which will, in turn, affect their ability to deliver on time and any consequent delays to the project.

In my experience, before any major project starts a register of potential risks is established, together with a reasonable assessment of the likelihood of occurrence and the actions that need to be taken to mitigate that risk. In the instance of Welborne no such Delivery Risk Register (if one actually exists) has been placed in the public domain for comment. Without any visibility of the existence of such a major document, and the lack of transparency in the reporting process, the plan is not justified and must remain unsound at this stage.