

The Wickham Society Response to
Fareham Borough Council's Main Modifications to the Welborne Plan (LPP3)

The Welborne Plan is supposed to offer proper guidance for a sustainable development which benefits new residents and the wider population.

Doubts on the soundness of the Plan have been expressed both before and during the public examination. Fareham Borough Council has just produced a series of "main modifications" to the Plan's wording. These are now open to consultation. The Wickham Society's responses to the modifications, set out below, consider their general significance and also the likely consequences for Wickham residents. Although the wording of the Plan is changed the substance remains the same and in its present form it remains unsound

MM2.

The Council was asked to modify WEL2 to emphasise the relationship between Welborne and Fareham to the South. Neither the new bullet point (bullet point 1) nor the modified 6th bullet point achieve this aim.

To say (bullet point 1) that the new development will form a functional part of Fareham and the wider South Hampshire area does not answer the question asked and has very little meaning.

Welborne will fall within Fareham Borough but this is a purely administrative connection. The M27 motorway must act as a physical and psychological barrier between Welborne and Fareham to the south.

WEL2 bullet point 6 is little changed and is so ambiguous that it raises more questions than answers.

To say that there will be a high level of self containment may acknowledge the tenuous connection between the two communities, but it is not at all clear how self contained the new town will be.

Robust reduce and manage policies sound effective but the detailed proposals in the Plan are very limited.

Bus rapid transit seems to have very limited destinations outside Welborne and given that it has no separate track outside the new town it may not be effective. The Gosport to Fareham BRT which is mostly on a separate track has reduced car travel by only 2%.

To say that access to Welborne will be principally to/from the south can in no way be guaranteed. The physical barrier between Fareham and Welborne is emphasised by there being only one road which allows Welborne inhabitants direct access to or from the south, that is the A32, which passes under the motorway. This must act as a bottleneck, particularly given the widespread traffic congestion already existing on the A32 and feeder roads south of the motorway. The modified motorway junction 10 will not be in place for several years into the development and already both it and its south going feeder roads are congested.

The A32 running alongside and eventually through Welborne runs north as well as south. This northern route gives access to both Portsmouth and Southampton as well as the wider area. According to the modified phasing plan Welborne housing is going to be initiated at once. Lack of easy southerly access and very limited on site employment may well mean that these householders will use the northerly route. Such habits are hard to break.

To say that the rate of development will be linked to the funding and provision of necessary infrastructure is ambiguous given that housing is to be initiated at once (new WEL 41) whereas significant road construction must by its very nature be long term. WEL 2 is supposed to emphasise connectivity to the south. Fareham Borough Council's Major modification fails to do this and the likely increase in the traffic coming north through Wickham is of major concern to its residents and also to Winchester City Councillors.

WEL 2 cannot be justified as it is not an appropriate strategy based on proportionate evidence.

MM 3

The Council was asked to clarify how it considers settlement buffers. FBC's response in the modified WEL 5 is to maintain the 50 m as the buffer size between Welborne and adjacent settlements but adds three rather limited conditions where the buffer might be 75m. There are other possible interpretations of the Inspectors question.

Winchester City Council and Fareham Borough Council's Standing Conference have both given reasons for larger buffers and it has been brought to our attention that FBC in a number of documents including LPP2 (Development Sites and Policies Plan) have consistently argued that the existing gaps between settlements south of the M 27 motorway must be retained. These are much greater than 50m. If Welborne is to be sustainable the buffers between Welborne and settlements north of the motorway should be increased. This is particularly the case for Funtley.

WEL 5 cannot be justified as it is not based on proportionate evidence.

MM 4

The criterion relating to noise, light pollution and air quality added to WEL 6 is insufficient for a sustainable development. This should read "Noise, light pollution and air quality measurements will precede the development and continue during it. These measurements will be acted on to mitigate any effects on the development."

Modified WEL 6 cannot be justified as it is not based on proportionate evidence.

MM 5

The Examiner has asked FBC to take measures to ease pedestrian/cycle movement across the A32. The proposed superficial addition to WEL 6 criterion iii will not do this. This part of the A32 through Welborne is to be a dual carriageway and it is likely to be a busy through road as well as prime route for Welborne inhabitants when the development is complete. It is important that the Welborne Plan, which is long term, makes a clear and precise statement to cover road safety later in development. This is important for everyone who uses the road including those from Wickham

WEL 6 cannot be justified as it is not based on proportionate evidence.

MM 6

Welborne is being promoted as a unified concept a "new community based on 21st century garden city principles." We recognise the need for "different character areas" which may require some variation in strategic design codes but the promoters should already have reached agreement on the overall design and this should be reflected in the first sentence of WEL 7. If Welborne is to go ahead, the second half of the modified sentence "to cover at least the areas within their own control" should be deleted. This would make much more sense of the proposed additions later in WEL 7.

Possible differences in design codes resulting from multiple promoters mean that the Welborne Plan cannot be justified.

MM8

Wickham is a compact and successful community already popular with visitors. One of the reasons for this success is that all essentials for daily existence are provided

at its centre in the immediate vicinity of the Square. This includes health care and schooling. Welborne town is planned as a self contained community six times the size of Wickham but provision of health care and schooling depend, to a large extent, on factors outside the control of the promoters. This is likely to put additional pressure on facilities in Wickham (and possibly existing facilities in Fareham). It is therefore difficult to see how promoter produced impact assessments as proposed in the modified WEL 10 and WEL 11 can prevent significant adverse impact on Wickham or Fareham during the course of development.

This is not an appropriate strategy and therefore cannot be justified.

MM10

If Welborne goes ahead the Plan now **requires** developers to meet the target of 30% affordable housing. However, the rewritten WEL 18 gives developers a let out because of viability considerations and need. As worded, affordable housing can be reduced in any phase of the development and never fully made up. As for viability, GVA (Welborne evidence document EV 30) shows, based on forecast current costs including affordable housing costs, that the Welborne scheme is unviable. If this is true before the development begins it is likely to be true during construction.

Who is to determine need. As worded, Fareham Borough Council has abrogated the need for 30% Affordable housing for which it has consistently made great play. This may be significant for Wickham people as the examiner of the Fareham Borough Council Core Strategy (LPP 1) confirmed that Welborne was a strategic development covering South Hampshire.

As it stands and with the caveats in WEL18 the Plan is not effective as it is not certain that 30% Affordable Housing can be delivered over the plan period. This has strategic implications.

MM11 (see also MM 2 and MM 21)

The amendment to WEL 23 criterion iii is meaningless. Does "masterplan layout" refer to the Concept Masterplan which is summarised in the Strategic Framework and is too inward facing and general to provide evidence that the Plan looks south for its main highway links. It merely provides unsubstantiated hope that this will be the case. On the other hand, if it refers to the Comprehensive Masterplan then this depends on the site promoters and has yet to be produced. In the absence of a Transport Assessment and Transport Framework (due later) it is impossible to provide evidence that the development is going to be south facing in transport terms.

This aspect of the Plan cannot be justified as it is not based on proportionate evidence.

MM 12

The proposed modification to Paragraph 7.24 merely generalises the uncertainty about the effects of junctions on to the A32. Of critical import is the unchanged final sentence of this paragraph. The new north south route across the site will join the new junction 10 to the A32 to the north of the development. This may reduce the pressure on the A32 within Welborne but it is likely to considerably increase congestion in and out of Wickham. TfSH traffic modelling has emphasised traffic flow between Welborne and Fareham and the preferred option for junction 10 is predicted to reduce traffic on the A 32 within Welborne, but the role of the spine road does not seem to have been considered.

This aspect of the Plan cannot be justified as it is not based on proportionate evidence.

MM13

The modification to Paragraph 7.27 item1 is so general as to be meaningless. What sort of works at the junction of the A32 and A334 in Wickham can possibly discourage traffic movements? Hampshire County Council and local residents surveys have shown some 17,000 traffic movements at this junction on each of two randomly selected separate days in 2014. Welborne traffic and easy access to junction 10 are very likely to substantially increase this traffic. What traffic management measures in the town centre are envisaged to prevent Welborne residents using their roads? Including driving along the A32 north?

This aspect of the Plan cannot be justified as it is not based on proportionate evidence.

MM 14

Fareham Borough Council's modification MM14 is an unsupported statement and WEL 25 does not explain how a south directed policy will be achieved. For insight into the problems see MM 2 above. and most importantly see:- *Welborne Examination Evidence Document WP 04103. Statement of Winchester City Council. Transport Access and Movement.* This document sets out the problems associated with southern access to Welborne and the likely traffic problems for Wickham and

the hinterland to the north given the many uncertainties and lack of evidence inherent in the Welborne Plan.

This aspect of the Plan cannot be justified as it is not based on proportionate evidence.

MM15

Fareham Borough Council is proposing to build a large town to 21st century garden city principles. Given this, allotment provision should be encouraged not reduced (WEL 29). There may be national rules for minimum allotment provision, but given the emphasis put on the "green" nature of the development this provision should be maximised.

The reduction in allotment provision in this garden city aligned town is neither positively prepared, justified nor effective.

MM16

1780 dwellings will be built to the east of the A32 in an area very obvious from Portsdown Hill and high ground to the north east. Welborne Plan paragraph 4.11 calls this a "Parkland Character Area" but does not make clear what this means in terms of built landscape. The additional paragraph to WEL 33 is also very general and does not respond to the Examiner's question on structural **planting** as a protection to long distance views in to the development from outside.

This modification cannot be justified as it is not an appropriate strategy.

MM18

The modified WEL 37, although an improvement, is worded in such a way that it does not require an initial overall plan to ensure that infrastructure provision in each phase of the development is compatible with the requirements of the new town when complete. The Plan states (9.17) that there are currently two known options for waste water treatment. One of these involves the River Meon which passes through Wickham and although downstream may affect river flow. Surface water drainage is already a significant problem in Wickham.

This aspect of the Plan cannot be justified as it is not based on proportionate evidence.

MM 21

The new phasing plan provides more detail, but is essentially the same as the original and is a cause for concern.

As a result of Southern Water's intervention significant detail on fresh water infrastructure is provided, but power and waste water infrastructures are treated very superficially.

Of greatest concern is the lack of detail and apparent anomaly for road infrastructure. As set out in the phasing plan the A32 is going to bear the brunt of traffic for at least 15 years. There is no indication when the A32 is going to be made dual carriage way. The new junction 10 will not exist until the towards the end of the second phase. Thus, supplies for building 1500 homes district and local centres and a primary school will have to be brought to the site by the A32 adding to congestion. The internal spine road connecting to the M27 is scheduled during the third phase by which time in excess of 3000 homes is envisaged. Without the spine road many Welborne people who work away from it must use the A32 to get to junction 10, or to go north or south. It is only in the 3rd phase that the BRT internal road network is first mentioned. All this suggests that the A 32 will be much used and habit is hard to break. The problems will be a huge disadvantage for everyone, in both Welborne and surrounding communities. The phasing plan needs to be re-evaluated based on a detailed transport analysis, which is yet to be performed

This aspect of the Plan cannot be justified as it is not based on proportionate evidence.

MM 22

Fareham Borough Council has removed the final paragraph of WEL 41, but paragraphs 10.36 through 10.41 set out guidance for deferral of infrastructure provision in Welborne and they should be removed.

This modification to the Plan is not sufficient.

MM 23

For the monitoring and review response Fareham Borough Council claims that the phasing plan "will inform understanding of the Plan". This can be questioned because of lack of much supporting evidence. To suggest that the Plan will be effective in part depending on "s106 planning agreement approved alongside planning application(s)" must be questionable as a development of this magnitude requires finance well beyond s106 agreements (*Standing Conference Chairman's Presentation 21st February 2013*) and this should be taken into account at every

stage. This is particularly the case since much of this finance will be required for essential infrastructure throughout the development.

The Plan is not effective as there is no certainty that it is deliverable over the plan period nor that it based on effective on cross boundary strategic priorities.