

Ref:  
(official use only)

# FAREHAM

## BOROUGH COUNCIL

### Local Plan Part 3: The Welborne Plan Modifications Consultation

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Please return to Fareham Borough Council by 5pm on Monday 9 March 2015

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This form has three parts:

Part A – Personal Details.

Part B – Comment section for Main Modifications.

Part C – Comment section for Minor Modifications.

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#### Part A: Personal Details

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Title

Name

Address

Email Address

Telephone No.

Organisation represented\*

\* Only agents need complete organisation box.

## Part B – Comment section for Main Modifications

You will need reference to the following document to make a comment:

- Schedule of Main Modifications proposed to the Welborne Plan

**Representations should relate only to the Main Modifications and should not seek to repeat previous representations or request further changes to the published plan. Representations on Main Modifications need to focus on the grounds of soundness and legal compliance as set out in National Planning Policy Framework – namely that it is:**

- **Positively prepared** – the plan should be prepared based on a strategy which 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 plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

**Which Main Modification(s) do your comments relate to?**

MM1	<input type="checkbox"/>	MM9	<input checked="" type="checkbox"/>	MM17	<input checked="" type="checkbox"/>
MM2	<input checked="" type="checkbox"/>	MM10	<input checked="" type="checkbox"/>	MM18	<input checked="" type="checkbox"/>
MM3	<input checked="" type="checkbox"/>	MM11	<input checked="" type="checkbox"/>	MM19	<input type="checkbox"/>
MM4	<input checked="" type="checkbox"/>	MM12	<input checked="" type="checkbox"/>	MM20	<input type="checkbox"/>
MM5	<input type="checkbox"/>	MM13	<input checked="" type="checkbox"/>	MM21	<input type="checkbox"/>
MM6	<input checked="" type="checkbox"/>	MM14	<input checked="" type="checkbox"/>	MM22	<input type="checkbox"/>
MM7	<input checked="" type="checkbox"/>	MM15	<input type="checkbox"/>	MM23	<input checked="" type="checkbox"/>
MM8	<input type="checkbox"/>	MM16	<input checked="" type="checkbox"/>		

**Please provide comments on why you consider the Council's proposed Main Modification(s) to the Welborne Plan (as you have specified above) to not be legally compliant or unsound.**

generally not enough independent evidence that it can be delivered in its present form and is not viable. Therefore it cannot all be considered effective in accord with NPPF and is unsound.

Fareham East Councillor Katrina Trott

MM2 The statement that the new development will "form a functional part of Fareham," is at odds with the fact that Welborne has also been described as a "New Town" and "self contained". Welborne is south facing at the request of Winchester City Council which has concerns that the additional traffic generated by Welborne plus the change to an all moves Junction 10 of the M 27 will significantly increase the northbound traffic on the A 32 into the Meon Valley.

The absence of an agreed layout for the all moves Junction 10 has had a detrimental effect on the Traffic Impact Assessment And there is no clarity that the Sub Regional Transportation Model has been used to quantify the amount of additional traffic on roads to the south as a result of modifications to MM 2, MM 11 and MM 14.

The amendment to the 6th bullet point states that the BRT will form a key component of the access strategy. Currently there is no evidence that this is funded, nor a guarantee that the commercial bus company will manage it, not withstanding the comment made at the Welborne Standing Conference Workshop on Thursday February 26th by Dinah Rooke of ATLAS that there will be at least 3 BRT bus routes by 2019. That is only 5 years away,

Insufficient objective evidence that a "carefully designed transport intervention will minimise the traffic on local and strategic road network and mitigate any environmental ..."

For the reasons above I consider that the Plan fails to meet the NPPF requirement in terms of justification as it is not based on appropriate or proportionate evidence and therefore should not be considered "Sound".

MM 3 These proposals completely fail to satisfy WEL 5 (prevention of coalescence between Welborne and existing settlements). At the Council Meeting of January 21st to agree the proposed amendments, fellow councillors of Fareham East, Fareham North and myself, whose wards are closest to Welborne raised motions to increase the settlement boundaries with Funtley and Knowledge to at least 100 metres and more. These were defeated, which is ironic since the "strategic gaps" between Fareham and its separate settlements of Stubbington (approx. 1km) and Titchfield (approx. 4-500m) were hotly defended. If Welborne is not merely an extension of Fareham, but a separate entity, why should it be treated differently.

These concerns have been repeatedly raised by the Welborne Standing Conference, of which I am a member and were specifically raised by the Chairman in his submission of Dec. 3rd 2014 (Doc. and I feel sure will form part of the submission by The Standing Conference resulting from the workshop held on February 26th which I left early due to illness. They have also been raised by the Community Groups of which I am also a member.

Since neither the views of the Standing Conference nor the Community Groups have been heeded in this respect I contend that MM 3 does not meet the duty to cooperate, is not justified and is therefore "Unsound".

MM 4. Air Quality. As Welborne is on the NE side of the very busy M27. As the prevailing winds are SW air quality will have unacceptably high concentrations of exhaust gasses, diesel particulates and rubber dust will drift over the area.

Additionally there is no evidence of any consideration of probable much diminished air quality which will be the consequence of increased, often stationary traffic on North Hill, due to waiting in queues at traffic lights, which will be one of the main routes in and out of Fareham from Welborne. I believe that there should be a much higher level of investigation. In that absence the current Plan cannot be considered effective in terms of the NPPF and is therefore "Unsound".

There is a significant difference between what may be proposed in a Planning document like this and what will occur in practice in future, when developers will find viability reasons to reduce measures to mitigate the impact of pollution. I do not have confidence that FBC, with limited resources, will have the power to enforce the plan sufficiently.

MM 6. Pages 46-47 of policy WEL 7. Strategic Design Codes. Whilst this appears justified, I have serious concerns that the developers, with their far greater resources than those of FBC, will attempt at every stage to ensure they achieve the maximum possible profit, using "viability" as a tactical weapon. The wording, "...to ensure that they support and do not harm the deliverability of each development phase." Is the cause of my concern as "deliverability" is a possible get out clause for developers. Therefore I submit this needs to be strengthened.

MM 7. Addition to end of para.5. 17. Since ".....there is already an oversupply of vacant office space and sites with planning permission across South Hampshire." No matter when office space is provided it will remain empty.

Immediately south of M27 Junction 10, within Fareham East, on the A 32 there is empty office space at Furzehall Farm, Furze Court, Bramble House and also on High Street.

I submit that many residents of Welborne will add to commuter figures, seeking employment elsewhere unless other industrial concerns, rather than offices, are provided.

MM 9. Amendment to Policy WEL 16. Phasing the provision of a secondary in phase 3 is far too late. As a consequence there will be many hundreds of "school runs" to Henry Cort and Cams Hill Secondary schools often for the entire time pupils are at those schools.

This MM fails to question this fact, which will further exacerbate traffic problems on local roads, missing the opportunity to ensure that the secondary school is provided in good time for the pupils' benefit, rather than that of the developers.

MM 10. Clarification of Policy WEL 18 regarding affordable housing provision.

This is one of my main concerns. Since the idea that Welborne would largely "deal with" Fareham's Affordable Housing deficit is how the whole idea of the development was "sold" to residents, specifically in a special edition of the Council's information magazine. There is yet another "get out clause" for developers, "....., unless a robust and transparent viability appraisal.." then further there is a second, "Where it is agreed that a residential phase will not meet the 30% target of affordable housing, the subsequent phase or phases will be required to meet that shortfall....if possible in viability terms."

I contend that "viability" can be regarded as a ruse whereby developers can claim a plan to be unviable, using careful manipulation of figures, and build far less than the required percentage of affordable homes. They expect a far greater return on their money than other enterprises

MM 11, page 92 Policy WEL 23. This modification links directly with MM 2 has yet to be evidenced with detailed traffic assessments of the already congested local road network in Fareham. There is no clarity as to which highway schemes relating to Welborne are funded and which not.

The continued lack of clarification regarding infrastructure funding does nothing to make me believe that Welborne is financially viable. I believe that this calls into question of justification, based on proportionate evidence.

MM 12, 13, 14. WEL 23 and WEL 25 (Traffic Management measures on A 32) Traffic flow is a key element and the proposed modifications and the traffic management plan is totally immature and takes insufficient heed on the potential impact on the heavily used local road network in the north of Fareham. The phrases, "... some works may be required..... it may be more appropriate....appropriate measures will need to be identified.. are not sufficiently robust.

MM 16. WEL 33 (Structural Landscaping Schemes) this needs to be strengthened to ensure that developers and contractors provide well designed planting and landscaping to reflect the concept of the "Garden Community" to help mitigate the visual impact of new industrial developments viewed from North Fareham and the M 27. Otherwise I consider that MM16 cannot be justified as it relies on inaccurate evidence, not taking account of the topography of the site

MM 17. WEL 36 (Clarification regarding optimising energy efficiency.) This is very disappointing as the vision should be to build now to "future proof" homes against rising energy bills and to minimise carbon emissions. There are economies of scale to be gained from large developments. Thirty

years ago double glazing was not standard in new build homes, but it is now. In Cambridgeshire I have seen new homes, including "affordable" ones, being built with solar panels in on the roof. There is too much use of the phrases, "if appropriate ", " unless it can be demonstrated to be unviable" which are, in my view get out clauses for developers who wish to maximise profits. What other industry expects a 20% return?

MM 18 WEL 37 and MM 19 WEL 49. (Clarity on waste water and flood risk/ sustainable drainage)

These have been often voiced and noted concerns of Community groups and Standing Conference members. There should be independent review and an explicit inclusion on financial viability, affordability and deliverability.

Currently I believe that the current modified plan is still not Effective.

This is, largely due to the lack of any necessary detailed waste water disposal information, plus accurate information about downstream flood risks along the R. Wallington which is Clay based and responds rapidly to the increasingly heavy rain storms or the R.Meon which has also flooded badly due to the changes in weather patterns.

MM 23 ( Monitoring and Review ) Residents I have spoken to in Fareham East, the ward I represent, and myself have concerns about how delivery of infrastructure will be enforced. There needs to be tighter definitions of infrastructure and works are necessary in the Phasing Plan avoid token compliance by the developers. There should be conditions, clearly laid down, ensuring that the next phase does not begin if the required infrastructure for the previous phase has not been delivered.

In conclusion, as it stands, I have no confidence that the Welborne Plan can be delivered. Therefore in my view as there is not enough independent evidence that it is viable, it cannot be considered Effective in accord with the NPPF and is "Unsound."

