

Packer, Lucy

From: Steve Peters <[REDACTED]>
Sent: 07 March 2015 14:46
To: Planning Policy
Subject: Welborne Plan Modifications Representation

These are my comments on the modifications to the Welborne Plan:

MM1 (Review of Local Plan) : The PUSH Spatial Strategy review is not due to be published until mid 2015 at the earliest and possibly not until 2016. It should be noted that although FBC takes its development guidance from PUSH, none of the committee members are democratically appointed and the meetings are not open to the public for scrutiny.

MM2 (Relationship between Welborne & Fareham to the South – WEL 2) : FBC cannot seem to decide what Welborne is going to be. During the Full Council meeting on 21 Jan, Welborne was variously described as being “a New Town” and “an Urban extension of Fareham”, by none other than FBC’s Executive Member for Planning & Development. The revised wording now being offered under this modification serves to contradict and confuse rather than add clarity to the issue.

It should be remembered that the issue of making Welborne “South facing” was included in the Welborne Plan at the specific behest of Winchester City Council, which has long standing concerns that the additional traffic generated by Welborne, together with the provision of full functionality to J10 of the M27, will have the effect of causing a significant increase in Northbound traffic on the A32. As was seen at the EiP, many people lacked any confidence in the current output of the Traffic model, which predicts only a 2% increase in Northbound traffic on the A32. Travellers will go where they want to go. This is a prime example of the extent to which the transport modelling is both incomplete and fundamentally flawed.

Furthermore, the absence of an agreed layout for the proposed J10 of the M27, has not only adversely impacted on the Traffic Impact Assessment work which now appears to have stalled, but also means that the SANGS deficit cannot be quantified. The various layout options will have a different “land take” and given the proximity to the M27, it remains my view that none of Fareham Common, ought to be considered part of the SANG provision.

The above paragraphs demonstrate that the Plan seems to fail to meet the NPPF requirement in terms of justification as it is not based on appropriate or proportionate evidence and cannot therefore be considered “Sound”.

With regard to Self containment, it should also be noted that the target figure has now been completely removed from the Welborne Plan; an omission that casts further doubt as to the sustainability of the Welborne development.

I suggest therefore, that it is neither positively prepared nor consistent with National policy.

MM3 (Settlement Buffers) : It is my view that the current proposals completely fail to satisfy WEL 5 (prevention of coalescence between Welborne and existing settlements) This view is obviously shared by those FBC Councillors whose Wards are closest to Welborne, who at the Council Mtg on 21 January raised a number of motions which sought to “strengthen” the Welborne Plan by increasing the size of the Settlement buffers. Suffice to say, all these motions were rejected by FBC Councillors, predominantly by those on whose Wards, Welborne will have the least impact. These weren't unreasonable buffer sizes, I hasten to add; 200m was suggested as a maximum, which is still considerably less than those enjoyed by other wards in Fareham, seen as necessary to prevent villages being joined up.

Given that FBC are disregarding the views of local councillors, residents, the local Community Groups and those members of the Standing Conference who also shared the view that the buffer zones were inadequate, I would suggest that MM3 in its current form does not meet the Duty to Co-operate, is not justified and is thus "Unsound". The 50m/75m provision was seen to be somewhat ambiguous during the meeting of 21 January but was nonetheless agreed anyway. Because of the woolly liability that buffer zones might start from the wall of a property rather than from the property's boundary, MM3 cannot possibly be seen as Sound.

MM 5 (Pedestrian & Cycle movement across the A32) : there is still little evidence in the proposal as to how this might be achieved.

MM 7 (Early Office provision) : Early provision of Office employment space has the potential to generate significant levels of additional traffic; accordingly and has been evidenced at Whiteley close by, the highways infrastructure needs to be in place in advance of any such early provision.

MM 8 (Retail & Leisure development within the District Centre) : This modification still fails to adequately describe the relationship between Welborne & Fareham/Wickham centres.

MM 9 (Location of the Secondary school) : Whilst the location is better than the previous proposal, delaying a school until 2026 is far too late and needs to be brought forward in the Phasing Plan. By 2026 some 2,860 houses are expected to have been completed in Welborne alone and at no stage has any evidence been produced that existing secondary schools in North/East Fareham have the spare capacity to absorb this level of demand for school places, especially with a large development at North Whiteley.

MM 10 (Affordable housing) : All along, the council executive has pushed the claim that Welborne was desperately needed to provide affordable housing to homeless families in Fareham. Not only was the wider scope exposed by the last inspection, it is now extremely disappointing that the developers have been given so much latitude to undershoot the targets on viability grounds. I suggest therefore, that this lax approach to affordable housing provision, which has no mechanism that demonstrates affordable housing will be deliverable over its period, begs the question as to whether the Plan is effective in NPPF terms and therefore Sound.

MM 11 (South facing Development) : This modification is not backed up with solid evidence that it's in any way achievable other than through commuter habits heading for the M27 and that relies on chance rather than planning. Despite claims, there is no evidence that infrastructure will be properly funded.

MM 12/13/14 (Traffic Management measures on the A32) : These modifications serve only to demonstrate the absolute immaturity of the means by which the significant levels of additional traffic generated by Welborne will be managed. They add no clarity whatsoever, are entirely unsatisfactory and need to be re-considered within the Phasing Plan.

MM 16 (Structural Landscaping Schemes) : Compared to Whiteley which, apart from a few buildings poking over treetops, isn't visible at all the Welborne site is largely open ground and easily visible from the south and from the east, it is difficult to envisage how any amount of structural landscaping will be capable of protecting the "long distance views" claimed without some considerable expense. I suggest that the landscaping themes seen in the plan illustrations are wholly misleading, which display mature treelines which simply won't exist where they are.

MM21 (Phasing Plan) : There is little evidence to show that the house build phasing is appropriately timed with regard to the provision of infrastructure to support it. The provision phasing of schools, care centres and a decent road network are delayed to the point where neighbouring settlements will take the brunt of it. Already QA Hospital is suffering from poor

targets, especially with regard to A&E targets and Southampton General isn't far behind. FBC hasn't taken this into account, simply assuming that the Hospital Trusts "will sort it out", as if it's a case of "not our problem". In fact, the council executive seemed to take that attitude with regard to primary care provision as well. That's not acceptable.

I read through the Welborne Plan when it was published, attended the EiP hearings as well as the Full Council Meeting in January where councillors "discussed" the modifications. All the way through, my opinion is that the plan remains woolly and too much of a "suck it and see" GCSE exercise and that the council is relying on the inspector to tell it what to do and what to change to make the plan sound. At the January meeting, the executive member for planning and development said that he'd fully expected the plan to require modification. I would expect a council to put forward the most robust plan it could, not one that it expected to fail. Already, the leader of the council is stating that the council has been fully vindicated over Welborne. Considering this has been written whilst the public consultation is still proceeding, I find that highly unethical and tantamount to dishonesty towards residents.

With these points in mind, I cannot find the Welborne plan Sound.

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