

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

Title	<input type="text" value="Ms"/>
Name	<input type="text" value="Sheila Doherty"/>
Address	<input type="text"/>
Email Address	<input type="text" value="REDACTED"/>
Telephone No.	<input type="text"/>
Organisation represented*	<input type="text"/>

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

Welborne has always been presented to the public as a separate new town north of Fareham. Many local people will be unaware that what is actually intended is simply a hugely oversized extension of North Fareham, which is utterly disproportionate to the size of the town of Fareham (as opposed to the borough). The revised wording contradicts what has been presented to the public. It should also be noted that if access is principally to/from the South then traffic through North Fareham will be hugely affected. Construction of a fully functional Junction 10 will only make matters worse. The current suggestion for the layout of the fully functional junction excludes the needs of the residents of North Fareham and considers only the needs of Welborne residents. Also, there are good reasons historically why Junction 10 was designed for traffic only travelling to and from the east and these have been disregarded. This shows that the layout is far from being agreed. The Parsons Brinckerhoff report on the Welborne Transport Strategy acknowledges the fact that people “may adjust their travel patterns when all moves at Junction 10 becomes possible”. Regarding one of the affected

junctions at Kiln Road/Park Lane/North Hill, it also states : “The junction itself is currently restricted with limited space to provide additional capacity and will require improvements to cater for the inevitable additional traffic movements. Detailed modelling will be undertaken in order to identify the potential for improvements within the existing constrained highway layout, however without third party land take it is unlikely that operational effectiveness can be optimised at this location. Further work is required.” The traffic model presented also shows many shortcomings, including the highly unlikely prediction of only a 2% increase in Northbound traffic on the A32, and as such surely cannot be trusted as an accurate model. This all demonstrates that the Plan fails 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”.

The current proposals are supposed to prevent coalescence between Welborne and existing settlements (WEL 5). However, there is clearly no commitment to honour this with the pitiful buffer sizes (50m), even with the modified wording. In addition, contrary to the wording in the document, it is impossible to achieve visual and physical separation with such buffer sizes and an insult to the communities bordering the development, particularly since the decisions have been made by councillors representing wards nowhere near Welborne. It is further galling to learn that the same councillors would never accept settlement buffers of such inadequate size in their own wards when attempting to prevent coalescence. Since the pleas from the community groups representing the surrounding villages to provide appropriate buffers have been totally disregarded by FBC, MM3 does not meet the Duty to Co-operate, and as such should be considered “Unsound”.

If access is principally to/from the South then traffic through North Fareham will be hugely affected. Construction of a fully functional Junction 10 will only make matters worse. The current suggestion for the layout of the fully functional junction excludes the needs of the residents of North Fareham and considers only the needs of Welborne residents. Also, there are good reasons historically why Junction 10 was designed for traffic only travelling to and from the east and these have been disregarded. This shows that the layout is far from being agreed. The Parsons Brinckerhoff report on the Welborne Transport Strategy acknowledges the fact that people “may adjust their travel patterns when all moves at Junction 10 becomes possible”. Regarding one of the affected junctions at Kiln Road/Park Lane/North Hill, it also states : “The junction itself is currently restricted with limited space to provide additional capacity and will require improvements to cater for the inevitable additional traffic movements. Detailed modelling will be undertaken in order to identify the potential for improvements within the existing constrained highway layout, however without third party land take it is unlikely that operational effectiveness can be optimised at this location. Further work is required.” The traffic model presented also shows many shortcomings, including the highly unlikely prediction of only a 2% increase in Northbound traffic on the A32, and as such surely cannot be trusted as an accurate model. This all demonstrates that the Plan fails 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”.

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Date

## Part C – Comment section for Minor Modifications

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

- Schedule of Minor Modifications proposed to the Welborne Plan

**Representations should relate only to the Minor Modifications and should not seek to repeat previous representations or request further changes to the published plan.**

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

AM1	<input type="checkbox"/>	AM18	<input type="checkbox"/>	AM35	<input type="checkbox"/>	AM52	<input type="checkbox"/>
AM2	<input type="checkbox"/>	AM19	<input type="checkbox"/>	AM36	<input type="checkbox"/>	AM53	<input type="checkbox"/>
AM3	<input type="checkbox"/>	AM20	<input type="checkbox"/>	AM37	<input type="checkbox"/>	AM54	<input type="checkbox"/>
AM4	<input type="checkbox"/>	AM21	<input type="checkbox"/>	AM38	<input type="checkbox"/>	AM55	<input type="checkbox"/>
AM5	<input type="checkbox"/>	AM22	<input type="checkbox"/>	AM39	<input type="checkbox"/>	AM56	<input type="checkbox"/>
AM6	<input type="checkbox"/>	AM23	<input type="checkbox"/>	AM40	<input type="checkbox"/>	AM57	<input type="checkbox"/>
AM7	<input type="checkbox"/>	AM24	<input type="checkbox"/>	AM41	<input type="checkbox"/>	AM58	<input type="checkbox"/>
AM8	<input type="checkbox"/>	AM25	<input type="checkbox"/>	AM42	<input type="checkbox"/>	AM59	<input type="checkbox"/>
AM9	<input type="checkbox"/>	AM26	<input type="checkbox"/>	AM43	<input type="checkbox"/>	AM60	<input type="checkbox"/>
AM10	<input type="checkbox"/>	AM27	<input type="checkbox"/>	AM44	<input type="checkbox"/>	AM61	<input type="checkbox"/>
AM11	<input type="checkbox"/>	AM28	<input type="checkbox"/>	AM45	<input type="checkbox"/>	AM62	<input type="checkbox"/>
AM12	<input type="checkbox"/>	AM29	<input type="checkbox"/>	AM46	<input type="checkbox"/>	AM63	<input type="checkbox"/>
AM13	<input type="checkbox"/>	AM30	<input type="checkbox"/>	AM47	<input type="checkbox"/>	AM64	<input type="checkbox"/>
AM14	<input type="checkbox"/>	AM31	<input type="checkbox"/>	AM48	<input type="checkbox"/>	AM65	<input type="checkbox"/>
AM15	<input type="checkbox"/>	AM32	<input type="checkbox"/>	AM49	<input type="checkbox"/>	AM66	<input type="checkbox"/>
AM16	<input type="checkbox"/>	AM33	<input type="checkbox"/>	AM50	<input type="checkbox"/>	AM67	<input type="checkbox"/>
AM17	<input type="checkbox"/>	AM34	<input type="checkbox"/>	AM51	<input type="checkbox"/>		

**Please provide your comments on each of the proposed Minor Modifications that you have ticked above.**

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Date