

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

24<sup>th</sup> February 2015

[planningpolicy@fareham.gov.uk](mailto:planningpolicy@fareham.gov.uk)

Ref: Fareham Local Plan Part 3: The Welborne Plan – Main Modifications

Dear Sir,

Please find below my responses to some of Fareham Borough Council's proposed Modifications to the Welborne Plan, following on from the Inspector's Preliminary Findings.

MM2 Relationship between Fareham and Welborne -

RESPONSE: FBC's response to this issue is fundamentally contradictory – The response envisages Welborne as a '*... functional part of Fareham and wider South Hampshire ...*' (new first bullet), but the aim of the development will be to '*... create high levels of self-containment*'. In my eyes this is more like self-delusion. As a 'functional' part of Fareham, Welborne will, in effect be seen to outsiders as simply part of Greater Fareham; another part of the urban sprawl along the M27 corridor.

The next sub-bullet point – '*The development will address a significant proportion of trips through the development of robust and manage policies*;' barely makes any sense at all.

If access will be '*principally to/from the south via the A32 and M27*' (sub bullet point 4) then what about Welborne being functionally part of the wider South Hampshire area – i.e. connected to Wickham, Waltham Chase, Bishops Waltham and the Meon Valley, or does South Hampshire only exist along and 'below' the M27 corridor?

And the last sub-bullet point is pure fantasy – '*Carefully designed transport interventions (what, where and when?) will minimise the traffic impacts on the local and strategic road network (how and when?) and mitigate any environmental impacts (what measures will be applied to assess the effectiveness of this mitigation? – see also MM4).*'

The proposed word changes to the Welborne Plan and the confused concepts of functional connections and self-contained separateness envisioned within the Plan, point clearly to its fundamental unsoundness.

MM3 Settlement buffers –

RESPONSE: FBC have still not provided evidence to support its claims that the proposed buffers will be effective in achieving the intentions of 'visual and physical separation'. The actual depth of the buffers is only one contentious issue, but there are many others to do with the landscaping, planting, accessibility, maintenance, etc of the buffers that are yet to be resolved. None of the previous concerns I, and many others, have raised about settlement buffers have been addressed by this minor addition of words, and the requirement for developers to provide 'site sections' (i.e. more pretty architectural 'drawings') does precious little to reassure the serious concerns already raised. As with so many of the other issues highlighted in the Inspector's preliminary findings, FBC is apparently just paying lip service

to legitimate concerns, and the Inspector's 'Main Modifications' are treated as requiring only minor changes in wording by the Council, when actually more substance is required.

MM4 Noise, light pollution and air quality ". . . measures necessary to mitigate any likely impacts"

RESPONSE: FBC's response to these very important issues is totally inadequate. The Council's response is at the very heart of questions about its competence and willingness to respond to local residents' concerns. Welborne, during its development and settlement stages, will, without any shadow of doubt, have a massive impact on the local area, and the lives of local residents, and will inevitably add significantly to existing noise, light and air pollution problems in the area generally. To simply refer to ". . . measures necessary to mitigate any likely impacts" without any indication of how, when and where levels of noise, light and air pollution will be monitored, before and during the lifetime of the development, is totally inadequate. The response simply raises many more questions than it answers. What mitigation measures can or will be applied? At what point will these mitigation measures be triggered? Who will be responsible for applying or enforcing these mitigation measures, and how will their effectiveness be measured, and against what yardstick?

It is not insignificant that it took the Inspector's preliminary findings to point out this very important omission from the original Welborne Plan. FBC's apparent (and recent) concern for noise, light pollution and air quality is simply far too little and far too late.

MM8 Retail and Leisure impacts.

RESPONSE: The concern here seems to be with Welborne drawing 'customers' away from the existing facilities (leisure and retail) in Wickham and Fareham and for once we have a promise that *'Comprehensive impact assessments shall (to) accompany planning applications . . . '*

This rather begs the question why *'comprehensive impact assessments'* have not been called for in relation to such things as local and strategic traffic networks, sensitive coastal areas, noise, light and air pollution, etc. One wonders why the retail outlets (and leisure facilities) should have this favoured status in FBC's plans.

If FBC is really serious about its concept of 'self-containment' then the facilities (both retail and leisure, not to mention cultural) provided within the borders of Welborne will need to realistically 'compete' for attention with the facilities within and beyond the local area. With access to the M27 so close at hand (see also MM14) the impact of the Welborne development will be felt well beyond Fareham and Wickham, and the new residents will need to be seriously 'encouraged' to stay local, if the vision is to be realised in any measure.

Whatever social engineering and control measures the Welborne Plan intends to put in place for the so-called 'self-contained' development, it will be for the future residents of Welborne to 'vote with their feet' (on bikes, cars and motorcycles and the occasional BRT bus) and utilise the outlets and facilities that best suit their needs (and wants), whether they be local, in the adjoining centres of Wickham and Fareham, or even further afield. FBC cannot ring-fence the development and nor can it dictate what amenities the future residents will utilise.

MM12 South facing, and

MM13 Traffic management measures for the A32

RESPONSE: The minor word changes proposed by FBC on these two issues, conveniently seem to ignore the existing traffic routes which use the A32 at this point. To some extent it doesn't matter if Welborne is south or north facing (except of course to Winchester City Council), as the significant extra traffic generated by the Welborne development will add to the existing traffic flows in both north and south directions on the A32. If Junction 10 of the M27 is developed into an all-ways junction, as planned (and as crucial to the Welborne development itself) then even more traffic will be generated along the A32, in both directions (in addition to the existing traffic, and in addition to the traffic flows generated by the Welborne development). It is as if FBC were so fixated on the self-containment concept of Welborne that it has forgotten that there are other traffic routes that will be using the A32, and be affected by the development of Junction 10 as an all-ways junction, both to and from the south and north.

There are significant places of interest, still in South Hampshire, that exist north of Welborne and no amount of wishful thinking (or minor word changes) on behalf of FBC, will deter those wishing to travel north through the site, whether from Fareham or off of the M27. Even more traffic will be 'encouraged' to access the M27 via Junction 10, whether travelling from North of Welborne or through the local road network from the Fareham direction. There were good reasons for not making this an all-ways junction when it was first built, and those reasons have not changed. In fact those original reasons have become strengthened over time with the inexorable increase in vehicular traffic – Fareham already has the highest ratio of cars to population in the country.

MM14 Principle vehicular access to Welborne

RESPONSE: Again one of the Inspector's 'Main Modifications' is answered by FBC in the form of a minor word change, with no indication of how the objective will be achieved and no success criteria defined. More 'lip service' paid to serious issues.

Yours sincerely

Richard Mills