

From: Emma Johnson [REDACTED]
Sent: 09 March 2015 16:36
To: Planning Policy
Subject: Welborne Consultation 26 January / 9 March 2015

Please find below my response to Fareham Borough Council with reference to the Welborne WVCA Letter of 12 Feb 2015 and the LATEST CONSULTATION – WELBORNE PLAN

MM 1 (Review of Local Plan)

It is understood that the review of the PUSH Spatial Strategy will be published in mid 2015/early 2016.

MM 2 (Relationship between Welborne & Fareham to the South – WEL 2)

This issue has been mired by muddled thinking from the outset and has never been properly addressed; to the extent that 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. Neither the local Community Groups (nor I suspect Winchester CC), have any confidence in the current output of the Traffic model, which predicts only a 2% increase in Northbound traffic on the A32. I contend, that 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 our view that none of Fareham Common, ought to be considered part of the SANG provision.

I contend, that the above paragraphs demonstrate 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”.

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 similarly contend therefore, that it is neither positively prepared nor consistent with National policy.

MM 3 (Settlement Buffers)

It is the unanimous view of the local Community Groups, 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 Jan 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. The only conclusion that can be drawn, is that Localism is an alien concept @ Fareham!.

It is worthy of note, that the so called "Strategic Gaps" South of the M27, (Deemed necessary by FBC in order to prevent coalescence between existing Villages/Settlements in that location), are very significantly greater in size than the derisory "Settlement Buffers" deemed acceptable for Welborne.

It should also be noted, that specific concerns regarding the inadequacy of Settlement Buffers were raised by the Chairman of the Standing Conference in his submission of 3 Dec 2014 (Responses post Examination – Issue 3 – Doc.CD38 refer)

The fact that the current draft completely ignores the views that have been repeatedly raised by the Welborne Standing Conference (SC) is not only extremely disappointing; but more importantly now calls into serious question, whether any useful purpose is being served by that particular body. The SC was established by FBC "as an Engagement Mechanism", given that it would appear that FBC no longer take any heed as to its output, the inference is clearly that it no longer serves any useful purpose.

Given that FBC are taking heed of neither the local Community Groups nor the Standing Conference then I would contend, that MM3 in it's current form does not meet the Duty to Co-operate, is not justified and is thus "Unsound"

In conclusion, the 50/75m Settlement Buffers singularly fail to deliver the "Visual & Physical separation" required by Policy WEL 5 (MM3 is inextricably linked to MM 16 – Pse see those comments with specific regard to the use of false evidence and the failure to take proper account of the topography of the land – CD 38 refers.)

I contend therefore that MM 3 cannot be justified, as it is based on evidence that is both inaccurate and misleading.

MM 4 (General Design principles)

The proposals to highlight the importance of noise & light pollution, together with air quality are supported; clearly however the baseline data needs to be captured in advance of any development on the Welborne site. The modification (criterion v) ought be further strengthened however by inclusion of the words "need to be measured, monitored and taken full account of" in developing proposals

MM 5 (Pedestrian & Cycle movement across the A32)

Whilst the modification is supported, it is disappointing to reflect that the draft offers no suggestions as to how this aspiration 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, the highways infrastructure needs to be in place in advance of any such early provision.

MM 8 (Retail & Leisure development within the District Centre)

Whilst an improvement on the earlier text, this modification still fails to adequately describe the relationship between Welborne & Fareham/Wickham centres.(See earlier MM 2 Comments)

MM 9 (Location of the Secondary school)

Whilst the location is agreed, it is firmly believed that to delay provision until the end of Main Phase III (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 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. (MM 21 Comments also refer)

MM 10 (Affordable housing)

Given that a substantial part of the rationale behind Welborne was to provide affordable housing, it is extremely disappointing that the Developers have been given so much latitude to undershoot the targets on viability grounds. I would contend 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, which links directly to MM 2, is entirely aspirational and has yet to be backed by detailed traffic impact assessments on the already heavily congested local road network in Fareham. Notwithstanding the press releases in late Jan 2015 regarding additional Government funding being provided to the Solent LEP there is a complete lack of clarity as to which highways scheme(s) relating to Welborne are now funded and which are not. The continuing lack of clarity regarding infrastructure funding in general, does nothing to engender confidence that Welborne is a financially viable project and specifically, whether it is justified and based on proportionate evidence.

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 15 (Allotment provision)

The reduction in Allotment provision whilst understood; serves merely to reinforce FBC's "Confused" approach to Welborne, which since its gestation has been variously described as being: "Built on Garden City principles, an Eco Town, A New Community, A New Town and most recently, an Urban Extension"

MM 16 (Structural Landscaping Schemes)

Given the sloping nature of the Welborne site, it is difficult to envisage how any amount of structural landscaping will be capable of protecting the "long distance views" particularly from the South and East.

Additionally, the Landscape schemes designed for the "Settlement Buffers" need to take full account of the topography of the land in question. As a case in point, the illustration @ CD 38 (Section 1/Funtley) depicts a level site – the reality however is that the land slopes steeply from the Funtley side and thus the "scheme" as currently proposed, would be wholly ineffective in terms of providing Visual Screening.

This lack of "detailed consideration" is manifest throughout the Welborne plan and you will be aware that in previous submissions, the Community Groups rightfully took objection to a picture of a 100 year old Tree belt (albeit of some 50m in width), being included within CD 38 as "an illustration of the Separation Buffers @ Welborne"

Accordingly, I contend that MM 16 cannot be justified in that it relies on evidence that is both inaccurate and misleading.

MM 17 (High Energy Efficiency standards)

Whilst this modification is a slight improvement on the previous text, it is disappointing that energy efficiency targets are being set so low and that the whole section remains riddled with caveats that will allow the Developers to undershoot the target on viability grounds, the rules on which are undefined.

MM 18 (Water supply and Waste water disposal)

The whole purpose of this modification was to provide clarity to the Inspector (and indeed to the Public also) as to the means by which Waste water in particular, would be dealt with. It adds no such clarity and is symptomatic of an immature and incomplete Welborne plan that requires much further work. It is inconceivable that the Welborne plan can be considered “Sound”, when such fundamental issues of infrastructure provision remain undecided and in the absence of a clearly defined waste water treatment plan over the project lifetime.

MM 19 (Flood Risk & SUDS provision)

The local Community Groups sought assurances in this regard at the time of the Core Strategy and were placated then, by promises that it would be addressed at the AAP/Local Plan stage of the Planning process. Yet again, FBC are now seeking to defer until a Planning application is submitted, a fundamental issue such as determining the downstream flooding risk posed by Welborne, to the villages of Wallington, Funtley & Tichfield. This is entirely unsatisfactory and in the absence of any evidence that the downstream flood risk can be mitigated, then I contend that the Plan can be considered neither deliverable nor effective.

MM 20 (HWRC)

This modification is supported.

MM 21 (Phasing Plan)

The proposal(s) to defer completing J10 of the M27 (2022) and provision of a Secondary School (2026) are believed to be not only fundamentally flawed, but will also generate wholly unacceptable traffic impacts.

Provision of a Primary Care Centre is not envisaged until the end of Main Phase III (2026); this ought be advanced in the Phasing Plan. By then, some 2,800 homes will have been completed and no evidence has been produced at any stage, that the existing Surgeries can cope with demand on this level.

In similar vein, FBC have neither sought nor received any assurances, that QA can cope; not only with the 6,000 homes being proposed for Welborne and the further 4,000 across the Borough as per their Core Strategy), but also, with all the other development being planned within the QA Catchment area. (QA Hospital has failed to meet it's A & E targets for the past 2 years and was recently named as being the 6th worst performing Trust in the entire Country - Southampton General was ranked as 12th worst and so clearly there is no “spare capacity” in the local area; existing FBC Residents have every right to be very concerned).

There is a disproportionate volume of housing proposed for either side of the Knowle Road in the early phases of the plan; this sits somewhat uneasily with the notion that Welborne is “South facing” and will establish vehicle movement patterns, in advance of the highways improvements, that will subsequently prove difficult, if not impossible to break.

Deferral of the main internal spine road network until some point in Main Phase III (2022 – 2026) is viewed with particular concern, as by 2022 full functionality ought have been provided to M27/J10, thus forcing all traffic onto the existing A32.

MM 22 (Deferral of Infrastructure contributions)

This modification is supported.

MM 23 (Monitoring & Review)

It is important that the Public have full visibility as to the delivery of key objectives and critical

infrastructure for Welborne and the proposal to highlight risks that have impacted to the Standing Conference using a Delivery Risk Register is supported.

The Strategic Review Group, which thus far have met only very infrequently, has no Independent representation

Additionally, it should be noted that no Viability Risk Register for the Welborne Plan has been placed in the public domain and despite repeated requests, the infrastructure funding shortfalls for each Financial Year of the Welborne plan have not been made available.

Accordingly, there is not a shred of evidence as to the viability of the Welborne Plan and as a result, there can be no confidence as to whether the Welborne plan is deliverable. In the absence of any such information, I feel that the Plan cannot be considered effective in terms of the NPPF and is therefore "Unsound".

Regards,

Emma Johnson (Fareham resident)