Fareham Society comments on the Welborne Plan Modifications

MM1. (Review of Local Plan)

The Society welcomes the commitment to an early review to form one local plan.

MM2. (Relationship between Welborne & Fareham to the South – WEL2)

The proposed new 1st bullet point states the obvious and does nothing to clarify the relationship between Welborne and Fareham to the wider south Hampshire area.

The public have been misled about the relationship between Welborne and Fareham from day one. It was initially a standalone self-contained settlement with the implication that it would not impinge on the surrounding community, particularly in relation to transport and facilities.

The claim that it would 'consume its own smoke' was challenged from day one. It would be too close to Fareham to be a standalone community; the gap between it and Fareham/Funtley would be much less than between Fareham and the other settlements such as Stubbington and the Western Wards. Wide 'strategic gaps' have protected the separation of these settlements, but only a narrow buffer is proposed between Welborne and Fareham/Funtley.

At Whiteley, for 30 years Fareham Borough Council has strongly supported the policy not to connect the new distributor roads to Burridge Road before Whiteley Way is completed in order to minimise impact on existing communities. At Welborne no such concern for existing residents has been shown; existing communities will suffer from additional traffic from both the new development and the changes to M27 Junction 10 from day one.

As the amendment to the 6th bullet point (4th sub-bullet) is a 'main modification' its impact on traffic flows should be quantified. The information on the reduction in traffic flows to the north and increases in traffic flows to the south should be published in a simple form so that the residents of Wickham and Fareham can provide informed comments.

MM3. (Settlement Buffers clarification WEL5)

The proposed clarification has added further confusion to an already confusing policy. The level of confusion was made abundantly clear at the Council meeting which considered the main modifications. In particular the addition of references to '75m' and to 'between buildings' has added to the confusion.

One of the reasons for the previous confusion is the **glossary** which refers to 'settlement buffer (or gap)' and states that 'settlement gap' means the same as 'strategic gap'. It also refers to 'green buffers' which appear to be the same as settlement buffers/gaps and strategic gaps.

More confusion is introduced by the references to physical or visual separation without making it clear that settlement separation is generally to be achieved by both, with the buffers forming only a small part of the total separation except from around Funtley where only the narrow buffer is proposed. The plan, including the glossary, needs to be clarified by separating settlement gaps from settlement buffers. Settlement gaps should be defined as the whole area which provides physical separation between settlements, including the recreation ground at Funtley, Fareham Common and the fields and woodland between Wickham and Welborne. This would be consistent with the way in which settlement gaps are used in the Winchester City Local Plan for separation between Welborne and Knowle/Wickham.

Settlement buffers should be defined as the more limited planted belts which will be used to create visual separation through intensive planting as shown in the sections in CD-38. The Society believes that the buffers should be a minimum of 100m from the existing boundary of Funtley (shown in Appendix B3) as requested by the Standing Conference. It also believes that the buffers should include wide, planted bunds on the perimeter of the buffers to achieve early visual separation, particularly where the new development is on higher ground.

MM4. (General Design principles, noise, light pollution and air quality WEL6)

The Society welcomes the inclusion of criteria related to noise, light pollution and air quality but believes that this is insufficient without adequate data on the existing situation and proposals for **robust monitoring and mitigation**. It should also be made clear that the measures to mitigate any likely impacts apply to the surrounding areas including North Fareham as well as within Welborne.

MM5. (Pedestrian & Cycle movement across the A32 WEL6)

The Society welcomes the modification but does not consider that it provides sufficient guidance on the crossing facilities that are required to prioritise pedestrian and cycle movement without causing excessive delay to vehicles. The absence of sufficient guidance illustrates the unsuitability of developing the land to the east of the A32.

MM6. (Strategic Design Codes WEL7)

The introduction of 'broadly' in paragraph 2 is not necessary and could result in excessive leeway for developers to seek to water down the design principles; **it should be deleted.**

MM7. (Early Office provision)

The Society supports the development of offices earlier than currently anticipated in preference to such development as distribution centres which will generate significantly more heavy goods vehicle traffic and provide fewer jobs. However it is

not clear how the earlier provision supports the sub-regional priority given to Portsmouth and Southampton.

MM8. (Retail & Leisure impact assessment WEL10 and WEL11)

The Society supports the clarification but remains concerned about the potential impact on established local centres.

MM9. (Secondary school Location WEL16)

The Society supports the location of the secondary school close to the District Centre, but remains concerned about the phasing of the school. See comments on MM21.

MM10. (Affordable housing WEL18)

The Society believes that the change to allow a reduction in the provision of affordable housing in one phase with the shortfall made up in a future phase is likely to result in viability problems and a consequent reduction in the overall provision of affordable housing. The Society is also concerned about the potential concentration of large numbers of affordable housing in one location as a result of this change.

MM11-MM14. (South facing Development/A32/Access to Welborne WEL23 and WEL25)

The Society is extremely disappointed that despite hundreds, if not thousands of pages of output from the Sub-Regional Transportation Model the basic information needed to understand the impact of increased traffic flows on the existing communities has not been provided.

The modifications do not provide any clarification. As they are 'main modifications' their impact on traffic flows should be quantified. The information on the reduction in traffic flows to the north and increases in traffic flows to the south should be published in a simple form so that the residents of Wickham and Fareham can provide informed comments.

MM15. (Allotment provision WEL29)

The Society objects to this change because Welborne should have a higher provision of allotments to underline its status as a 21st Century Garden Community. The Council's standard is based on a minimum size for a plot of 125sqm, when a traditional plot is 250sqm. The standard also makes no allowance for footpaths, separation between plots, parking etc.

The Allotment Strategy for Fareham (FBC05) proposes the provision of 27 plots per 1,000 households, but it does not justify limiting provision to half-size plots. The standard should be calculated on the basis of full size plots, with allowance for footpaths/separation in the same way as in the Taunton Deane Allotments Strategy

which uses a plot size of 290sqm. Welborne Policy WEL29 should be based on a plot size of 290sqm which would result in a standard of 0.30 hectares per 1,000 population. The modification should be changed by deleting' 0.13 hectares' and replacing it with: '0.3 hectares.'

MM16. (Structural Landscaping/planting WEL33)

The reference to 'respond positively' in the revised Policy WEL33 is insufficiently clear to properly guide developers, the public and decision makers on what is required. There is no justification for the policy not being as precise as the policy for the settlement buffers, for example by specifying that there should be a 50m landscape belt along the whole of the boundary of the development to the east of the A32 if this area is to be developed despite the Society's representations that it should remain undeveloped. The structural landscaping should also be used to provide an appropriate setting for the historic parkland at Roche Court, a heritage asset.

The impact of Welborne on views from the south can only be mitigated by substantial dispersed planting belts or groups of planting across the site in addition to peripheral planting buffers.

The modification should be replaced by the following:

'The structural landscaping will include 50m planting belts to be established on the northern and eastern boundaries of the site and north of the M27 and similar planting belts and large wooded areas dispersed within the site to reduce the impact on long distance views of the development from Portsdown Hill to the east and across the site from the south. It will be particularly important to have planting of sufficient scale to mitigate the impact of the new employment development close to the M27.

MM17. (Energy Efficiency/Passivhaus WEL36)

The modification is an improvement, but the proportion of dwellings built to Passivhaus standards should be much more than 10%.

MM18. (Water supply and Waste water disposal WEL37)

The clarification is an improvement, however the Society believes that the there should be more detailed information in the plan at this stage and that the proposed solution is subject to robust independent assessment of effectiveness, deliverability and viability. The change should be revised by adding the following after 'new waste water infrastructure';

', which has been subject to a robust independent assessment of effectiveness, deliverability and viability.'

MM19. (Flood Risk & SUDS provision WEL39)

The expanded policy wording is an improvement, but the Society believes that there should be more detailed information in the plan to demonstrate at this local plan stage that there will be no increased flood risk rather than leaving this to the planning application stage.

MM20. (Household Waste Recycling Centre WEL40)

The Society supports the modification.

MM21. (Phasing Plan)

The reinstatement of the phasing plan is welcomed, however the information needs to be set out more clearly, possibly in the form of a chart based on that in Appendix 1 to CD36.

There also needs to be additional clarification of what is meant by 'enhanced public transport 'and 'initial primary school provision'.

The Society continues to believe that infrastructure such as the primary and secondary schools should be provided earlier to ensure that Welborne is more self-contained and patterns of movement out of the area to reach such facilities are not established.

The Society remains concerned that the claimed spare capacity at the GP's surgeries in Fareham and Wickham in paragraph 5.70 of the plan has been exaggerated. Does the spare capacity refer to the buildings or GP practices?

MM22. (Deferral of Infrastructure contributions WEL41)

The Society supports the modification.

MM23. (Monitoring & Review)

It is assumed that the s106 agreement (paragraph 11.5) that will establish the phasing and infrastructure delivery plans will include Grampian conditions and trigger points to ensure that the infrastructure required in each phase is provided before any subsequent phase can commence.

It is also assumed that the reference to 'Strategic Group' in paragraph 11.6 means the 'Strategic Delivery Group' referred to in paragraph 11.3 in Appendix C-The Monitoring Framework; see comments on Minor Modification AM58 Appendix C below.

Minor Modifications

AM58 Appendix C paragraph 11.3(Monitoring Framework)

The statements in paragraphs 11.6 and 11.11 that because of the public interest in the delivery of Welborne it will be appropriate to report changes to the Delivery Risk Register and progress against targets will be reported to the Standing Conference are totally inadequate. Community representatives' should be added to the list of bodies/organisations to be actively involved in future Strategic Delivery Group meetings, the meetings should be held in public and minutes/notes of the meetings available soon after each meeting.

Table 11.1 should be revised to include quality of life indicators and to start with the following list of **key** indicators:

Housing completions;

Health provision;

Specific highway works, including changes to Junction 10 and changes to the local network;

Jobs provided within Welborne;

Employment floorspace within Welborne;

Retail floorspace;

School places provided within Welborne;

Open space and SANGS