

Ref:
(official use only)

FAREHAM

BOROUGH COUNCIL

Local Plan Part 3: The Welborne Plan Modifications Consultation

Please return to Fareham Borough Council by 5pm on Monday 9 March 2015

This form has three parts:

Part A – Personal Details.

Part B – Comment section for Main Modifications.

Part C – Comment section for Minor Modifications.

Part A: Personal Details

Title	<input type="text" value="Mrs"/>
Name	<input type="text" value="Ruth Saunders"/>
Address	<input type="text" value="[REDACTED]"/>
Email Address	<input type="text"/>
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	X	MM18	<input type="checkbox"/>
MM3	X	MM11	<input type="checkbox"/>	MM19	<input type="checkbox"/>
MM4	X	MM12	<input type="checkbox"/>	MM20	<input type="checkbox"/>
MM5	<input type="checkbox"/>	MM13	X	MM21	<input type="checkbox"/>
MM6	<input type="checkbox"/>	MM14	<input type="checkbox"/>	MM22	<input type="checkbox"/>
MM7	<input type="checkbox"/>	MM15	X	MM23	X
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.

MM2
 It is still unclear what the relationship between Fareham and Welborne is supposed to be. At the full council meeting on the 21st January, the town was described as an 'urban extension', which implies it will be an extension of Fareham rather than a new self contained town, as had previously been described. This was the first time that this term had been used, so was a surprise to the residents at the meeting. How the town is to be perceived when being developed is of fundamental importance - especially to those living in neighbouring villages (an 'urban extension' is very different to a 'self contained town'). I therefore find this modification unsound as it is not positively prepared nor consistent with national policy. It was recognised during the hearings that the software tool used for the transport modelling was flawed, so the assumption that traffic will be 'principally to / from the south' is still not based on accurate evidence. I therefore find this modification is not justified and is unsound.

MM3

This modification has actually made the situation regarding settlement buffers worse for local residents, with no justification for the change apparent. The amendment proposed now refers to a 75m buffer being suitable: 'Where a 50 metre wide settlement buffer would not enable a 75 metre separation between buildings in Welborne and buildings within a neighbouring settlement'. The word 'buildings' used, means that the buffer boundary's will not take into account residents gardens (a large proportion of Funtley residents do not have existing green space to the north as stated in the Plan). Therefore, if gardens were 30m in length for example on both sides of the new town and the existing villages, this would mean the buffer gap would be reduced to 15m. This is not sufficient to maintain a 'visual and physical separation' between communities. This was highlighted to the Council at the meeting on the 21st Jan and several councillors felt this was unfair on existing communities and proposed it was changed, but nevertheless it was passed. I would also refer the Inspector to the comments made by Mr Adrian Saunders. I will not repeat them here, but state that I fully support them as it evidences that the cross sections published and comments in the modification are inaccurate and misleading. I therefore find that this modification is unsound as reasonable alternatives have not been considered, based on proportionate evidence. I also find it has not been positively prepared as the printed cross sections put forward as evidence are inaccurate and give a false impression of the topography of the land. It has therefore not been objectively assessed.

MM4

It is disappointing that this modification has not taken into account the residents request to plant mature trees behind Funtley in the buffer zone, at an early stage of development in order to maintain a visual separation and also reduce the effect of noise, light, poor air quality etc. on local residents. These trees would help obscure the view from Funtley as the site is on an upwards slope away from the village and will therefore be visible at all times. The statement that this will be 'considered in developing proposals' is not sufficient to maintain these principles. A reasonable alternative was proposed by local residents which has not been discussed or debated, and I therefore find this modification unjustified and therefore unsound.

MM10

I find this modification really worrying. The entire purpose of building this new town, was to help support the housing needs of those unable to get onto the housing ladder due to the cost of homes. This modification gives the developers the leeway to reduce affordable housing to 10% if it can be proved unviable. I would suggest that developers of course will try to reduce the % of affordable housing at each phase, by trying to prove it is unviable to build the required amount. Who will assess the viability proposals put forward by the developers? According to the modification, this will be the Council. This should be contracted out to independent contractors to ensure objectivity, and then monitored by a group which includes residents, who are waiting for housing. This will ensure adequate objectivity on any assessment made. It also greatly concerns me that 'where it is agreed that a residential phase will not meet the 30% target of affordable housing, the subsequent phase or phases will be expected required to meet that shortfall in addition to the 30% target if possible in viability terms'. I would suspect that in every phase the developers will try to pass over the building of affordable housing to the next phase. Affordable houses are needed now, and this amendment gives the developers the option to defer building them until the very end (and there is not guarantee that if they still find it unviable to build these homes, they will not be built). I therefore find this modification has not been positively prepared and is not justified, and is therefore unsound. I would also propose that it is not in keeping with NPPF policies and is therefore unsound.

MM13

It is unclear here what is meant by 'locally agreed'. Does this mean the Council can agree it, or Fareham as a whole, or does it mean that it will be locally agreed with the residents of Wickham? It should be the latter. This is therefore unsound as the modification is unclear and

not positively prepared.

MM15

This amendment reduces the amount of allotment space to 0.13 hectares per 1000 population which is a reduction from the original Plan. This does not fit with the green aspirations of the 'Welborne Plan', nor will it encourage residents to be 'self contained' or grow their own fruit and vegetables, therefore mitigating some of the agricultural lost land for the development. There is a national shortage of allotments (which is growing year on year), so Welborne should be providing more rather than less in the Plan. (ref: Allotment waiting Lists in England (2011) National Assoc of Allotment and Leisure Gardeners). I therefore find this modification unsound as has not been objectively assessed nor is it in line with national guidance.

MM23

The Monitoring of the Plan appears to still be conducted in house by FBC and by the Standing Committee. The community groups have consistently over the last year, voiced their lack of confidence in the Standing Committee (which appears to be an 'information giving' committee rather than one of debate and discussion, with very few recommendations taken forward by the Council). I am very disappointed that no members of the public are to be invited to help monitor the key outcomes and critical infrastructure of the Plan (this happens in healthcare, so why not in planning?). It will remain solely under the control of the Council - with no external governance control to monitor the objectivity of decisions made. I feel this lack of governance regarding monitoring means that the Plan is still not positively prepared and is therefore unsound.

Date

Part C – Comment section for Minor Modifications

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.

Date