

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	Mr
Name	Edward Morell
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Organisation represented*	Funtley Village Society www.funtleyvillagesociety.org.uk www.facebook.com/funtleyvillagesociety

* 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 checked="" type="checkbox"/>	MM9	<input checked="" type="checkbox"/>	MM17	<input type="checkbox"/>
MM2	<input checked="" type="checkbox"/>	MM10	<input checked="" type="checkbox"/>	MM18	<input type="checkbox"/>
MM3	<input checked="" type="checkbox"/>	MM11	<input type="checkbox"/>	MM19	<input checked="" type="checkbox"/>
MM4	<input checked="" type="checkbox"/>	MM12	<input type="checkbox"/>	MM20	<input type="checkbox"/>
MM5	<input checked="" type="checkbox"/>	MM13	<input type="checkbox"/>	MM21	<input checked="" type="checkbox"/>
MM6	<input type="checkbox"/>	MM14	<input type="checkbox"/>	MM22	<input type="checkbox"/>
MM7	<input checked="" type="checkbox"/>	MM15	<input checked="" type="checkbox"/>	MM23	<input type="checkbox"/>
MM8	<input type="checkbox"/>	MM16	<input checked="" 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.

This response is in addition to the local Community Groups’ collective response dated 12th February 2015, sent by David Walton from the Wallington Village Community Association.

The comments below must not be taken as support for the Welborne Plan, as it is the Funtley Village Society’s view that the Welborne Plan as a whole is financially UNVIABLE. This takes into consideration the amount of major infrastructure required to be provided by the landowner developers, therefore we believe that even after these main modifications the whole Welborne plan is still unsound.

MM1

We believe that the modifications have made **both LP3 and LP2 plans unsound** as the council have committed in 2016 to “review comprehensively the Core Strategy, Development sites and Policies and the Welborne Plan to one local plan”. This commitment with the aim to amalgamate all the local plans before either have been found sound, would seem to call into question all evidence previously submitted by the council at the EIP’s in regard to the inspector’s written and spoken questions asked during the EIP’s of both LP2 and LP3 defining the relationship of LP2 to LP3 and regarding the need for two separate plans. Ultimately this calls into question the soundness of council to have two separate local plans under examination, when it is policy in LP3 to amalgamate it with LP2. The planned amalgamation of the local plans has made LP3 **unsound**, as Welborne is to be just a simple urban extension.

MM2 -- WEL2 -- MM2 & 5 & 9 & 11 & 12 & 13 & 14 are all related
MM2 is **not justified**.

There are no plans for a local road under the M27 to Kiln Road or into Funtley Village, so Welborne will remain dependent on the A32.

Any southbound traffic exiting Welborne has to cross the north-bound carriageway of the A32, and unless there are plans for a Welborne specific A32 underpass there is no way to force Welborne exiting traffic to go “principally to and from the south”. Even if Welborne residential & employment traffic could be coerced south towards the fully completed M27-J10, why would it, as the existing local roads are already gridlocked and the nature of Fareham Town does not allow for improvements without compulsory-purchase of domestic dwellings.

PUSH who are committed to delivering the housing numbers states on its own web site that the M27 already exceeds its built capacity (1st paragraph) <http://www.push.gov.uk/work/transport.htm> (attached).

The mention of the BRT bus is another unachievable aspiration, as the same PUSH transport statement admits to bus use as declining.

MM3 -- WEL5
MM3 is **not justified**.

The councils amalgamation in 2016 of the two plans in **MM1**, before both LP2 & LP3 have been found “sound” show that Welborne is not intended to be a stand-alone self-contained development but an integral part of Fareham’s singular local plan. This calls directly into question why Funtley, which is one of Fareham Borough’s oldest and historic villages, is being directly disadvantaged regarding the use of defined distances of “settlement buffers” in MM3 and the use of the term “strategic gaps” between settlements in the Fareham Local Plan 2.

The amalgamation of the two plans in 2016 should make Funtley subject to the same protection from development as developable land south of the M27 and as such, calls directly into question the soundness of WEL5 in relation to MM1.

The Funtley Village Society is in agreement with the sentiments and submission from the Local Community Groups on MM3.

This modification has actually made the situation regarding settlement buffers worse for Funtley 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 boundaries 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 households in Funtley, 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 Fareham Borough Council at the full council meeting on the 21st January 2015 and several councillors felt this was unfair on existing communities and proposed it was changed. Despite these valid objections MM3 was passed in it's current wording.

We would also refer the Inspector to the comments made by Mr Adrian Saunders, one of our committee members. We will not repeat them here, but state that we fully support them as it evidences that the cross sections published and comments in the modification are inaccurate and misleading.

We therefore find that this modification is **not justified**, as reasonable alternatives have not been considered, based on proportionate evidence. We 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 -- WEL6

MM4 is **not justified**.

In relation to the lack of strategic gap MM3, Funtley due to the topography of the land and the rising ground to the north of the village will be directly disadvantaged regarding light pollution, noise pollution and air quality if the plan is found sound, both during the build and on completion. Monitoring needs to be carried out on the southern side site, before any plans are submitted, to gain a base line and the policy should state that "robust planning obligations" are to be made to ensure the effects are fully mitigated.

It is also very disappointing that this modification has not taken into account our request in our submission dated 5th April 2014, to have planted mature trees behind Funtley in the buffer zone/strategic gap at an early stage of development in order to maintain a physical and visual separation. This would also have the additional beneficial effects of helping to reduce the effect of noise, light, poor air quality etc on the residents of Funtley. 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 the Funtley Village Society, which has not been discussed or debated and we therefore find this modification **not justified**.

MM5 -- WEL6

Whilst the Funtley Village Society supports the pedestrian and cycling aspirations of the proposed Welborne Plan, the detail is lacking. There are already three woodland footpaths leading from the development site into Funtley and Fareham Common. This could potentially be an obvious way for a developer to avoid the costs and the need to put in place measures for pedestrians and cyclists to cross the A32.

MM7

The Funtley Village Society broadly supports employment, as Welborne has always been sold as being self-contained. However as the self-containment % figure has been dropped from the policy and with this in mind, the all-ways M27 J10 and local traffic mitigation works should be completed before employment space is taken up or traffic will 'rat-run' via Kiln Road and into Funtley to avoid the existing gridlock.

MM9 -- WEL16

The Funtley Village Society have major concerns for the amount of rat-running traffic that will be generated on existing local roads between Welborne and existing schools until the Welborne schools are built, considering the secondary school is not planned till phase 3 of the Welborne Plan.

MM10 -- WEL18

MM10 is **not effective**.

Welborne is 'intended' to provide 30% affordable housing for Fareham. Although this myth was disproved by the previous inspection of the Core Strategy, the affordable housing numbers should not be allowed to drop purely on viability issues. 'Viability' is a test of overall soundness and as the original principles of the plan have had to be dramatically modified to make it 'viable', then the plan must be found **unsound**.

MM15 -- WEL29

Although the Funtley Village Society is disappointed with the reduction in plot size, we would welcome the allotments to be positioned at the other side of the 'strategic gap' north of the village. This would strengthen MM3 in increasing settlement separation and assist with MM4 light pollution, noise, and air quality.

MM16 -- WEL33

MM16 is **not justified**.

Funtley has been omitted from the structural landscaping commitment.

The text should read...

"Structural landscaping schemes will show how they positively negate material impact on long and close distance views."

This would assist with clarification of MM3 as Welborne is on a rising uphill gradient when viewed from Funtley.

MM19 -- WEL39

MM19 is **not effective**.

The fact that a full and comprehensive down-stream flooding assessment is yet to be carried out is of grave concern, as areas of Funtley are already subject to flooding. Facts and empirical data need to be gathered now and the landowner developers need to be able to demonstrate on their initial / outline applications, that they have proven measures to deal with this significant risk. The Funtley Village Society suspects that the underlying problem is of financial viability, questioning the soundness of the plan.

MM21

10.6e The Funtley Village Society welcome the enhancements to existing links, but has concerns as to the lack of detail showing these walkways / cycle routes, as the existing footpaths through and from Welborne to Funtley are not suitable for mixed traffic. The disused railway line would require major investment from Hampshire County Council to make it a safe all-year round route.

Date

March 8th 2015

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.

