

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="Ms"/>
Name	<input type="text" value="Claudia Pattison"/>
Address	<input type="text"/>
Email Address	<input type="text" value="REDACTED"/>
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	X	MM9	X	MM17	X
MM2	X	MM10	X	MM18	X
MM3	X	MM11	X	MM19	X
MM4	X	MM12		MM20	
MM5		MM13	X	MM21	X
MM6		MM14	X	MM22	
MM7	X	MM15	X	MM23	X
MM8		MM16	X		

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.

FBC has produced an extremely ambitious time frame for reviewing the Local Plan. While this is a welcome step, any such timeframe is meaningless without mechanisms to ensure both its efficacy and the integrity of the process. Without such mechanisms in place, this modification fails to meet the criteria for soundness.

Improvements to Jct 10 of the M27 are crucial to the success of Welborne – and yet they are still not fully funded or designed. With the new ‘all-moves’ Jct 10 not fully operational until 2022, the A32 will be under immense strain until that time. It is vital that FBC provide detail NOW about the ‘carefully designed transport interventions’ that will ‘minimise the traffic impacts on the local and strategic road network and mitigate any environmental impacts.’ We also have scant information about the BRT extension to Welborne. Where is the funding coming from and when will it be available? FBC claims that ‘the rate of development will be linked to the funding and provision of the necessary transport infrastructure’. However it recently emerged that FBC

is planning to bring forward 500 new homes at Welborne without any new infrastructure whatever – a fact that was not communicated at the public hearing and only revealed in government inspector John Felgate's report (published in January 2015), when he upheld the developer's appeal to build 37 homes on land next to the Navigator pub in Lower Swanwick. This strategy will put a huge and unnecessary strain on the local road network, as well as healthcare facilities. The National Planning Policy Framework states that Local Plans must be: '...realistic about what can be achieved and when (including in relating to infrastructure). This means paying careful attention to providing an adequate supply of land, identifying what infrastructure is required and how it can be funded and brought on stream at the appropriate time; and ensuring that the requirements of the plan as a whole will not prejudice the viability of development... 'The Local Plan should make clear, for at least the first five years, what infrastructure is required, who is going to fund and provide it, and how it relates to the anticipated rate and phasing of development...' 'Where the deliverability of critical infrastructure is uncertain then the plan should address the consequences of this, including possible contingency arrangements and alternative strategies.' I cannot see how FBC's Plan fulfils these requirements when there are so many unknowns relating to infrastructure provision. The Plan is therefore fundamentally unsound.

FBC have stressed time and time again that Welborne will be a distinct and self-contained community. A 50m Settlement Buffer (or indeed the 75m that is proposed in certain circumstances) cannot possibly achieve policy WEL5's stated aim of physical and visual separation between Welborne and the neighbouring settlements of Funtley, Knowle and Wickham. Rather, this derisory buffer simply serve to join the medieval village of Wickham in the north to the market town of Fareham in the south, making the area one homogenous mass and destroying the unique identities of these two communities (and everything in between) forever. In particular, the land to the north of Heytesbury Farm is highly visible and a buffer of 50m here, at the Welborne-Wickham border, is simply not sufficient. The land in this location should be used as green infrastructure to maintain its landscape quality and contribute towards SANGS. Furthermore, a 50m buffer will, from both an environmental and ecological perspective, be unable to effectively deliver both the quantity and quality of SANGS land required. Equally objectionable is the fact that the Welborne promoters have, in many cases, adopted already existing green spaces and tree lines as part of the 50m Settlement Buffer. The plan is therefore unsound.

Given the huge amount of traffic that Welborne will generate, it is vital that the air quality in the area is assessed and documented now, before any construction begins, and measures and policies put in place to maintain future air quality.

There is currently a surplus of office provision within the Fareham area (and indeed beyond), with many office buildings lying empty. Meanwhile, two empty office developments close to the town centre have been sold for residential development. How then can the employment/office zones at Welborne be justified and where is the evidence to support their existence? If these employment zones are established, businesses at Welborne will recruit not only from Fareham, but from the entire region, further adding to traffic congestion and destroying Welborne's aspiration of self-containment.

To delay provision of the secondary school until 2026 – when 2860 houses will be completed – is far too late. FBC has failed to provide any evidence that existing secondary schools in Fareham have the spare capacity to accommodate this extra demand.

A large part of the *raison d'être* of Welborne was to provide affordable housing. It is therefore disappointing to see that the developers have been given a 'get out' clause, meaning they can fall short of their targets on viability grounds – the parameters of which remain undefined. With no mechanism to ensure that affordable housing will be delivered, the Plan is not positively

prepared – nor consistent with national policy – and therefore cannot be considered sound.

The modified Plan declares that Welborne (now being described by FBC as an ‘urban extension’ of Fareham) will be ‘southward facing’, thus minimising the traffic effect on communities, such as Wickham, to the north. However, there are many facts that contradict this claim: 1. In January, FBC voted down a proposal to increase the buffer zone with Wickham to the north, which remains at a paltry 50m. Meanwhile the buffer zone to the south comprises the huge swathe of Fareham Common. Welborne may be an ‘urban extension’ of Fareham, but it is NOT an ‘urban extension’ of the historic village of Wickham. 2. The first phase of construction begins to the north of the site on the Wickham border. There is no practical or logistical reason for this (indeed it would make more sense to start developing to the south of the site, close to the M27 and the District Centre) – rather, it is motivated by the promoters’ desire to maximise profits at an early stage of the development. 3. Welborne’s ‘spine road’, linking north and south, will not be completed until some time in Main Phase III (2022-2026), forcing all traffic onto the existing A32. 4. Jct 10 of the M27 will not become ‘all-moves’ until 2022 – by which time 1500 new homes will have been completed. Consequently, Welborne residents wishing to access both the M3 and large employment centres to the West, such as Eastleigh, Hedge End, Winchester and Southampton, are more likely to travel via the A334 through Wickham, in preference to the M27. The combined effect of these decisions is that patterns of travel from the new homes will become well established northwards along the A32 through Wickham. Such patterns will be hard to change, even once the adjustments to Jct 10 are completed. It should also be noted that many existing residents in Fareham, Funtley, Knowle ROUTINELY use the A32 and A334 through Wickham as an alternative to the heavily congested M27, which operates at full capacity during peak times. When there are ‘incidents’ affecting Jcts 7-11 of the M27 (such incidents occur several times a week), traffic through Wickham is at a virtual standstill, with queues sometimes stretching all the way back to Jct 10. There is no reason to believe the residents of Welborne will not follow similar patterns of behaviour. FBC’s traffic modelling claims that only 2% of Welborne traffic will traffic north. However, a recent survey conducted by the Wickham Society and Wickham Residents’ Association showed that more than 16,500 vehicles negotiate the Wickham roundabout on a daily basis, more than half of which enter the village from the direction of Fareham. This completely discredits FBC’s claim and suggests its traffic modelling is deeply flawed. Based on these facts, MM11 is not justified and therefore unsound.

Once again, the modification adds no clarity to the issue of traffic management on the A32. It is therefore not justified and unsound. With two A-roads running through Wickham, the scope for traffic management measurements ‘in the town centre’ is severely limited. Additionally, it should be noted that Wickham is in fact a VILLAGE, not a town.

The same comments about MM11 apply here: The modified Plan declares that Welborne (now being described by FBC as an ‘urban extension’ of Fareham) will be ‘southward facing’, thus minimising the traffic effect on communities, such as Wickham, to the north. However, there are many facts that contradict this claim: 1. In January, FBC voted down a proposal to increase the buffer zone with Wickham to the north, which remains at a paltry 50m. Meanwhile the buffer zone to the south comprises the huge swathe of Fareham Common. Welborne may be an ‘urban extension’ of Fareham, but it is NOT an ‘urban extension’ of the historic village of Wickham. 2. The first phase of construction begins to the north of the site on the Wickham border. There is no practical or logistical reason for this (indeed it would make more sense to start developing to the south of the site, close to the M27 and the District Centre) – rather, it is motivated by the promoters’ desire to maximise profits at an early stage of the development. 3. Welborne’s ‘spine road’, linking north and south, will not be completed until some time in Main Phase III (2022-2026), forcing all traffic onto the existing A32. 4. Jct 10 of the M27 will not become ‘all-moves’ until 2022 – by which time 1500 new homes will have been completed. Consequently, Welborne residents wishing to access both the M3 and large employment

centres to the West, such as Eastleigh, Hedge End, Winchester and Southampton, are more likely to travel via the A334 through Wickham, in preference to the M27. The combined effect of these decisions is that patterns of travel from the new homes will become well established northwards along the A32 through Wickham. Such patterns will be hard to change, even once the adjustments to Jct 10 are completed. It should also be noted that many existing residents in Fareham, Funtley, Knowle ROUTINELY use the A32 and A334 through Wickham as an alternative to the heavily congested M27, which operates at full capacity during peak times. When there are incidents affecting Jcts 7-11 of the M27 (such incidents occur several times a week), traffic through Wickham is at a virtual standstill, with queues sometimes stretching all the way back to Jct 10. There is no reason to believe the residents of Welborne will not follow similar patterns of behaviour. FBC traffic modelling claims that only 2% of Welborne traffic will traffic north. However, a recent survey conducted by the Wickham Society and Wickham Residents Association showed that more than 16,500 vehicles negotiate the Wickham roundabout on a daily basis, more than half of which enter the village from the direction of Fareham. This completely discredits FBCs claim and suggests its traffic modelling is deeply flawed. Based on these facts, MM11 is not justified and therefore unsound.

The allotment provision at Welborne is woeful and entirely discredits its claim to be 'built on Garden City principles'.

Yet again, the modification adds little in the way of clarity and provides no detail about how the protection of long-distance views will be achieved. The views from Portsdown Hill are stunning and cannot be left in the hands of the Planning Committee, in the hope that they can find an effective solution. There is insufficient evidence to support this amendment and it therefore fails to meet the justified criteria. Furthermore, the landscape schemes designed for the Settlement Buffers are both inaccurate and misleading. The illustration at CD38 shows a level site at Funtley, when in actual fact the land slopes steeply from the Funtley side. As it stands therefore, the landscape scheme would fail to provide the desired level of visual screening at this location.

The energy efficient targets are disappointingly low – and yet again the developers have been given a 'get out' clause, allowing them to miss their targets on viability grounds, the parameters of which remain undefined.

With no clearly defined waste water treatment strategy, this modification only serves to underline the absolute immaturity of the Welborne Plan. This issue is simply too important and too technically sophisticated to be deferred until a planning application is submitted. The Public are entitled to know NOW how this project will be managed, executed and funded. Until they do, the plan is neither deliverable nor justified.

The issue of potential flooding risks downstream from Welborne needs evaluating and resolving now. Until there is evidence that the flood risk can be mitigated, the Plan cannot be considered effective.

The decision to defer both Jct 10 (2022) and provision of a secondary school (2026) will generate huge amounts of traffic and cause unacceptable levels of congestion on the local road network. These critical pieces of infrastructure need to be brought on stream much earlier in order to make the Plan viable. Provision of a primary healthcare centre, currently planned for the end of Main Phase III (2026), when 2860 homes will have been completed, should also be brought forward. There is no evidence that existing surgeries can cope with the additional demand. With construction expected to begin at the north end of the site, Wickham Surgery will be the nearest practice for the first Welborne residents. But Wickham has been allocated 250 new homes of its own and its surgery will therefore struggle to accommodate any intake from Welborne. Meanwhile, FBC have failed to secure any assurances that Queen Alexandra

hospital can cope not only with the 6,000 homes at Welborne and the additional 4,000 across the Borough, identified in the Core Strategy, but also with all the development being planned within the QA catchment area. It should be noted that QA has failed to meet its A&E targets for the past 2 years and was recently named as the 6th worst performing Trust in the country. Furthermore, as noted previously, Welbornes spine road will not come into full functionality until some point in Main Phase III (2022-2026). This will force all traffic onto the A32 and cause wholly unacceptable levels of congestion on the local road network.

There must be complete transparency regarding the delivery of key objectives and critical infrastructure for Welborne – and yet the Strategic Review Group, which meets only sporadically, has no independent representation. Moreover, despite repeated requests, FBC has failed to produce the infrastructure funding shortfalls for each financial year of the Welborne Plan. Consequently, there is no evidence to support the Plan's viability. Without such evidence, it falls well short of the NPPF requirements (see my quotes from the NPPF in MM2) 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