

Ref:  
(official use only)

# FAREHAM

## BOROUGH COUNCIL

### Local Plan Part 3: The Welborne Plan Modifications Consultation

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

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This form has three parts:

Part A – Personal Details.

Part B – Comment section for Main Modifications.

Part C – Comment section for Minor Modifications.

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#### Part A: Personal Details

Title	Mr
Name	Tom P Davies
Address	
Email Address	
Telephone No.	
Organisation represented*	UKIP

\* 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		MM17	
MM2		MM10		MM18	
MM3	X	MM11		MM19	X
MM4		MM12		MM20	
MM5		MM13		MM21	X
MM6		MM14		MM22	
MM7		MM15		MM23	
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.**

MM1

Fareham Borough Council plans to adopt a new Local Plan in Spring/Summer 2018. The Local Plan should be used to form the basis of the Welborne plan, and not the other way around as is being suggested. As a review of the existing local plan is, at least in part, an admission that the existing plan may need updating and might not be suitable for Fareham s needs at the present time. A decision on Welborne should therefore not be made until the introduction of the new Local Plan in 2018.

MM3

The suggested buffer zone for the Welborne Plan is 50 metres, rising to 75m in certain circumstances. The standard distance for the buffer zone should be 100 metres, rising to 150 metres if the outlined criteria are satisfied. Other councils in different parts of the country suggest/insist buffer zones of up to 500 metres, so to have just 10% of that would seem

ridiculous. To quote the Local Plan part 2: Development Sites & Policies p13 3.10, "Strategic Gaps between towns and villages help define the separate identity of individual settlements, and prevent coalescence. They are important in maintaining the settlement pattern in the Borough, ensuring that individual settlements remain separate. The Strategic Gaps also help to provide opportunities for green infrastructure and green corridors providing opportunities for recreation and biodiversity." The 50 metre buffer zone does not satisfy the recommendations of the plan. Even though no specific distance is stated it is apparent to all that a 50 metre gap would not protect the identity of individual settlements.

#### MM21

Phasing Plan (Incorporating MM11/12/13 Transport „Master Plan , slip road, junction and network) Does the transport master plan also set out how traffic is to be eased in the rest of the borough following the creation of Welborne? Consideration has been given to some roads but this is not enough. Fareham has traffic problems as it is and this will only exacerbate the problem. Traffic Management has not been given the necessary attention to ensure an adequate traffic flow. In Wickham traffic measures need to be identified and agreed before Welborne is built. This point extends to Fareham Borough and any required road works should be completed before Welborne is. Works to improve access and small scale works to the Local Highway Network are not substantial enough to ensure sufficiently that congestion levels in Fareham will not increase. There needs to be a more complete plan, which analyses each and every road in the Borough, incorporating the effect of around 12,000 additional cars on the road network.

#### MM16

MM16 Protection of views. Strategic planting is to be carried out to protect the views from Portsdown Hill. This should be afforded to all and so extended to protect the views and give an impression of a green space for Fareham Borough settlements that will overlook Welborne.

#### MM19

MM19 Flood Risk & Sustainability. The area is near constantly flooded and drainage systems cannot be relied on. Across the country developments build on areas at risk of flooding have been affected by what was apparently a "1 in 100 year event". With the prospect of climate change a real possibility, in the long term a 1 in 100 year event may become a 1 in 1 year event. These are things that you cannot plan for and should not take the risk on. To anyone with any amount of common sense building on an area that sees a lot of flooding is foolish. Paragraph 17 of the National Planning Policy Framework, "planning should.. encourage the effective use of land by reusing land that has been previously developed." „Brownfield land is referred to in official statistics as „Previously Developed Land (PDL) and encompasses "land that was developed but is now vacant or derelict, or currently in use with known potential for redevelopment". The relevant statistics on land use are compiled on the National Land Use database and published by the Department for Communities and Local Government (DCLG). The most recent figures for brownfield land is for 2009. The figures that are available show that, overall, there were 61,920 hectares of brownfield land in 2009, roughly the equivalent of 100,000 small football pitches. Most of the brownfield sites (54 per cent) are made up of vacant or derelict buildings or land. The rest represent buildings currently in use with the „potential for redevelopment . However, what we should be interested in is how much of this land has „housing potential . The DCLG makes exactly this calculation, finding from local planning authorities (who have the power to designate some of the land in their area) that 31,160 hectares of land is „potentially suitable for housing and: "could potentially provide around 1,494,070 dwellings." The Communities and Local Government Committee s report on the National Planning Policy Framework (NPPF) in 2010 also commented: "Even in the regions with lowest availability, it would take seven years of house building on previously-developed land at pre-recession rates to use up the current supply... However, figures also show that the supply of previously-developed land is being replenished at almost exactly the rate it is being

used in England as a whole, with some regional variation, so it should not be considered a finite resource.” Welborne is a complete failure on this front and does not comply with national recommendation or DCLG comments.

Date

## Part C – Comment section for Minor Modifications

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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