

**Planning (Welborne),
Department of Planning and Environment,
Fareham Borough Council,
Civic Offices,
Civic Way, Fareham,
Hampshire, PO16 7AZ**

8th June 2013

Dear Sirs

CPRE Hampshire Response to the Consultation on the Draft Welborne Plan - April 2013

CPRE Hampshire would like to make the following comments in respect of the Draft Welborne Plan - Local Plan Part 3 dated April 2013.

In general terms, CPRE welcomes the progress that has been made in attempting to “pin-down” many of the uncertainties that accompany a development of this scale. We also welcome the reduction from the original SE Plan housing numbers to some 6,500 dwellings and 78,650 sq m of employment space, and the withdrawal of the J11 business park. We regard these targets as a more realistic quantum of development given the constraints of the location. However, it must be re-stated that, in principle, CPRE still objects to the fundamental proposal for a new town, regarding it as unnecessary to meet Fareham’s own affordable needs, and likely to cause economic conflict with existing settlements in this part of South Hampshire.

There are remaining specific concerns in the details supplied in the Draft Welborne Plan, and these are detailed below by reference to certain paragraphs, but should not be considered as exclusive to those paragraphs only. The points are covered in the order in which they appear in the plan, and are not arranged in any hierarchy.

Para 2.4: Self containment

CPRE believes that the change in words from “will have a high level of self-containment” to “it will encourage self-containment” is a retrograde step, and seriously weakens the aspiration to promote a new type of community, and without adding to the already considerable congestion in this part of South Hampshire.

Para 2.6: Energy Efficiency

CPRE believes that the weakening of the resolve to promote the originally proposed high levels of energy efficiency in the face of current viability issues is a short-term approach, and does not match the aspirations set out in the vision as supported by the local community in previous consultations.

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Peter Bedford

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Para 3.18 Areas of High Landscape Sensitivity

CPRE believes that the areas of highest landscape sensitivity are those at the extreme north of the site AND also at the extreme east of the site adjacent to the slopes of Portsdown Hill.

Para 3.19 Scheduled Ancient Monuments

The above point is reinforced by this paragraph.

Para 3.41 to 3.56 Settlement Gaps

CPRE notes that the Plan places a high value on retaining the separate nature of the neighbouring settlements, and seeks to avoid the coalescence of Welborne with Funtley, Wickham and Knowle, but CPRE does not consider that a 50m buffer is wide enough to serve this purpose.

Para 5.20 Employment Needs and Access

It is stated that the designated employment areas are to be accessed by the M27 and A32, “so are well served by the strategic and local networks in all directions”, and will need to be capable of allowing freight movements. This is in direct contrast to all the consultations which expressed particular concern about the level of directly generated traffic that was likely to head north up the A32. This road runs through a number of historic Meon Valley villages within the South Downs National Park. To encourage an outcome that would lead to an adverse impact upon the Park would be contrary to National Park statutory purposes as laid out in the Environment Act.

Para 5.32 and 5.33 Retail Services

CPRE has concerns that the size of the main food store may be too small, and as such might encourage out-commuting, although we await the outcome of the Retail Study about the likely impact on stores in neighbouring settlements. Wickham must be included in any such study.

Para 6.4 Transport Studies

It is of huge concern to CPRE that “much of the detail for the transport strategy remains to be finalised”. This project has been touted for nearly 10 years, and it is inconceivable that at this late stage there are not extremely detailed studies and costing of any infrastructure requirements which can be made available for review by the public. At recent presentations by HCC it was clear that all options create excessive additional congestion on the local road network, within Fareham itself and up the A32. Cynically, one might ask if the results of the studies are being held back because of the bad news they tell.

Para 6.28 Transport Assessment

The Draft Welborne Plan states that “any planning application for the site must be supported by a Transport Assessment to assess the phasing of the development against the implementation of various off-site highway improvements, including the works to the M27

and A32 and any other primary or secondary links or junctions to minimise the traffic impacts on the local and strategic road network and mitigate any environmental impacts”. As stated in the comments above, CPRE considers that it is far too late in the process to leave such fundamental issues to the planning application stage. Any impacts must be considered at this stage in the strategic context of M27 capacity and adverse effects on the South Downs National Park up the A32. Mitigation is not the same as solving a problem; it is merely offering something else in exchange.

Para 8.18 and 8.19 Habitats Regulations Assessment (see also Section below)

The Plan states that “the Habitats Regulations Assessment Screening Statement that supports this version of the plan has identified a number of potentially adverse impacts on the internationally protected sites along the Solent. In order to comply with habitats conservation legislation, these impacts will either need to be avoided or properly mitigated if the development is to go ahead.” This statement underemphasises the critical importance of the HRA, and it is premature for the plan to say that the “expectation” is that Welborne will avoid or mitigate its potential impacts through the provision of natural green space. Green space, however large, cannot compensate for additional air pollution from traffic, disturbance, water abstraction pressures, waste water discharge and loss of habitat or species. In any event, the green space exists currently and therefore should not be described as additional provision or mitigation, as overall there will still be a net loss.

Para 8.22 to 8.24 Mitigation Land

Using the Thames Basin Heaths as a comparator to the Welborne proposal misses the point that the land set aside as mitigation in that case (SANGS) was primarily to compensate for predation of birds by domestic cats. This is not the case in Welborne, where the adverse impacts on European sites are much more fundamental, as outlined above, air pollution, water, waste, disturbance, loss of habitat, and these cannot be dealt with by simply re-naming adjacent open green space, which in any case, already exists. Simply re-naming it “mitigation land” does not even begin to deal with the negative environmental issues as laid out in the HRA, and in what possible way can it serve to solve the problems created by a development of this size in this location.

The Plan suggests “92 - 100 hectares of land as alternative natural green space could be provided through the combination of land in and adjoining Dash Wood and Ravenswood and the triangle of land adjoining Knowle, both in Winchester City Council's area”. The significant word is “alternative” - in what way can it be construed as alternative - since it is already green space and is already “set out and managed as natural green space or open countryside”.

Para 8.25 Gaps and Green Space

The Winchester Local Plan does include land within their purview as open green space, but this is to help prevent the possible coalescence of the settlements, and it does not absolve Fareham from providing sufficient green space within their own authority boundaries.

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In addition to the above comments, CPRE Hampshire would like to draw attention to the following quotes from the Habitats Regulations Assessment dated May 2012 as they are of relevance to our response to the draft Welborne Plan above.

The points below (HRA paragraph numbers) are of particular relevance to observations made in respect of Paragraphs 8.18, 8.19 and 8.22 - 8.24 above.

Furthermore, CPRE maintain that all the data gaps referred to in Paragraph 8.1.2 as reiterated below must be filled before the HRA can be finalised.

3.2.1 Atmospheric Pollution

The generation of additional road traffic associated with development under the AAP may result in significant effects on the ecological integrity of Chichester and Langstone Harbour SPA/Ramsar, New Forest SAC/SPA/Ramsar, Portsmouth Harbour SPA/Ramsar, River Itchen SAC, Solent Maritime SAC, and Solent and Southampton Water SPA/Ramsar. It may possibly also affect Butser Hill SAC.

4.2.1 Disturbance

In the sphere of potential influence of the Fareham SDA area, the sites that may be affected by disturbance resulting from new residents making recreational visits to the sites are the New Forest SPA, and the coastal sites of the Solent: Solent and Southampton Water SPA/Ramsar, Portsmouth Harbour SPA / Ramsar and Chichester and Langstone Harbours SPA/Ramsar.

5.2.1 Water Consumption and Abstraction

Additional pressure for water abstraction could result in adverse effects on the ecological integrity of the River Itchen SAC both via direct abstractions from the river and indirectly through groundwater abstractions. Impacts to other sites may also occur, including Chichester and Langstone Harbours SPA/Ramsar, Solent and Southampton Water SPA/Ramsar and Solent Maritime SAC as a result of Portsmouth Water's abstractions at Havant and Bedhampton Springs and a group of Sussex licences.

6.2.1 Waste Water Discharge

The location of the SDA is currently served by Southern Water's Peel Common WWTW, which discharges treated effluent into the Solent. There is therefore a potential pathway to the Solent and Southampton Water SPA and Ramsar, and the Solent Maritime SAC.

7.2.1 Functional or Actual Loss of Habitat

There is a theoretical pathway for the AAP to bring about loss or degradation of off-site foraging relied upon by the Brent geese of the Solent and Southampton Water, Portsmouth Harbour and Chichester and Langstone Harbours SPA and Ramsar sites.

8.1.2 Data Gaps

The report confirms that a number of data gaps for the HRA still exist. These include:

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- Future traffic growth on roads within 200m of European sites, and the data that would be required to prepare an atmospheric dispersion model of the effects of the AAP (if required);
- Final outputs of the SDMP in relation to whether changes to the scale or distribution of residential development within the SDA could avoid current or future impacts to SPA birds;
- What changes could be made to site management arrangements at European sites at the Solent and New Forest in order to reduce the impact of current and future visitors; and whether the provision of suitable green infrastructure could help to reduce the number of additional visitors;
- Although there appears to be a good degree of high level consensus between the sub-region's two water supply companies, Natural England and the Environment Agency on the need to reduce certain abstraction licences to within sustainable limits, there is still some uncertainty over how best to meet the resulting shortfall in supply;
- The capacity of Peel Common WWTW to accept foul water flows from up to 7,500 new dwellings at the SDA now that the Hedge End SDA has been halted should be established. Impacts from the construction of a new trunk sewer main may also need to be addressed by the HRA and/or wider assessment processes. The feasibility of diverting some foul water flows to Knowle WWTW should also be established;
- Establishing the extent and location of important bird flight paths across and around the SDA that may constrain future renewable energy options; and
- The importance of fields at Monument Farm as high-water foraging sites for Brent goose needs to be confirmed. The sites were not included in the latest Brent goose strategy, however, three or more years' worth of winter bird survey data would help to define the situation more precisely.

In conclusion, CPRE looks forward, on behalf of our many members affected by this development, to being kept apprised of each stage of the Area Action Plan.

Yours faithfully

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CPRE South Hampshire Group

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