

THE WELBORNE PLAN

REPRESENTATION 1

FINANCIAL VIABILITY/FUNDING AND PHASING OF INFRASTRUCTURE (WEL 41)

The GVA Stage 2 report (Feb 2014) commissioned by FBC, whilst very much at an iterative stage, clearly demonstrates significant concerns as to the financial viability of the Welborne Plan, particularly in the first 10 or so years and does little to engender confidence that the necessary infrastructure will be affordable. In similar vein, FBC's "Welborne Infrastructure Funding Strategy" (Jan 2014) whilst conceptually sound, offers no firm guarantees that Welborne will only go ahead if the infrastructure funding can be assured.

With specific regard to Infrastructure phasing, it is firmly believed that to delay providing an "All moves" J10 **(10.8)** until the end of Main Phase 2 in 2022, is fundamentally flawed. By 2022, 1,500 homes **(10.9)**, some 6,000 square metres of employment floorspace **(Table 1.2)**, and the 1st Primary School **(10.11)** are projected to have been completed. By then, both the District and Local Centres are also projected to be "at least partially completed"

HANDLING OF WASTEWATER (WEL 37) – The very fact that the means of delivering such a fundamental part of the Infrastructure provision has still to be determined at this late stage, is perhaps a very telling indicator as to the current immaturity of the Welborne Plan. **(9.21)**

CONCLUSION – The funding and phasing of the infrastructure required to support Welborne are of critical importance, as is the timely delivery of full functionality to J10. These issues, together with the current perception of overall viability, are clearly major concerns with regard to the "Deliverability" of the Welborne Plan. Accordingly, the Welborne Plan is considered UNSOUND, for the reasons cited above.

REPRESENTATION 2

TRAFFIC IMPACT/PROPOSED BRT ROUTE (WEL 23/24/25) –. Currently the M27, which is a key part of the Hants Motorway network, is at or close to capacity **(7.16)** and traffic volumes are forecast (by the Highways Agency) to increase year on year, regardless of whether Welborne goes ahead or not. In similar vein, much of the local road network is already gridlocked for much of the day and it is generally recognised that Fareham already has a significant deficit in terms of highways infrastructure. Continuing uncertainties as to the design of the revised J10 have not only prevented the Highways Agency from endorsing the layout of the new Junction 10, but also prevented traffic modelling work by the Highways Authority (HCC) on other key parts of the local road network. **(7.19 – 7.21 and as briefed by HCC to the "Standing Conference" on 25/2 2014)**

The fact that Welborne will generate significant levels of additional traffic is fully recognised **(7.25)** as is the fact that considerable congestion already exists on the local road network **(7.26)**.

The sustainability of Welborne is very heavily dependant, some might argue “over dependant” on a viable BRT system, that is funded, not just initially, but through life **(Yet to be assured)**. It should be noted that BRT Phase I, whilst having exceeded expectations in terms of passenger numbers, has reduced traffic volume on the A32 by a mere 2% and this key part of the local road network remains gridlocked for the majority of the day.

This somewhat stark reality helps put **(7.34)** into perspective. Accordingly, it would be grossly irresponsible to over emphasise the benefits that a BRT link to Welborne will bring in terms of reducing existing traffic congestion, let alone that post Welborne. The Local Plan, clearly shows that despite Fareham (apparently) having a “comprehensive Bus network“, some 80% of trips made by Fareham residents are currently made by car” **(7.32)** One can only wonder why!.

Much of the proposed BRT route from Welborne to Fareham BR Station **(Figure 7.1) (J10, via Wickham Rd and past the St Christopher’s Hospital Site, to “Red House”, via the Sainsburys roundabout, along Wallington Way to the Delme roundabout, via the notoriously congested, Delme, Quay Street and Town Station roundabouts)** is patently fraught with risk. These routes are already heavily congested at peak hours and measures to demonstrate how the additional Welborne derived traffic will be mitigated, are limited to a series of proposals that seek to afford priority to BRT usage. Clearly this will be to the detriment of other road users and will simply worsen the existing congestion in this part of Fareham. There is conclusive evidence that in Fareham, such prioritisation of roads to Bus usage, simply does not work and merely adds to traffic congestion. Exactly this type of proposal was trialled by HCC in 2013, (From the Quay Street to Station Roundabout’s). Suffice to say, it failed miserably and subsequently required a completely new scheme (currently funded, but yet to be delivered/proven) costing in excess of £1M.

In short, the current proposal is NOT a viable transport solution, to the additional traffic generated by Welborne and contrary to Table 4.1 of the Sustainability Appraisal (SA), it will reduce rather than increase capacity on the local road network. Additionally, it should be noted, that by increasing the functionality of J10, this will in its own right, attract additional traffic from both North & South of the A32, to J10; this seemingly obvious fact, is completely ignored by the Transport Planners @ HCC. As a resident having lived close to J11 for over 30 years, I would contend that the slight reduction in Motorway traffic cited at **(7.18)** as being a “key consideration” and positive benefit of making J10 an “All Moves Junction” will be more than offset, by the additional traffic that will be attracted to use an “All Moves” J10 in the future.

The proposal however **(at Table 4.1 of the SA and at 7.29)**, to close Pook Lane to through traffic, in order to prevent it becoming a “rat run” to J11, is fully supported.

CONCLUSION - There is not a shred of evidence within The Welborne Plan, that either the M27 or the local road network can cope with the additional traffic that Welborne will inevitably generate, nor are there any assurances that funding for the necessary Motorway and Highways improvements will be provided. The current transport proposals fail to support **WEL 23, WEL 24 or WEL 25**; accordingly the Transport, Access & Movement Plan at Chapter 7 of the Welborne Plan, is considered to be UNSOUND.

REPRESENTATION 3

DOWNSTREAM FLOODING RISK (Wallington, Funtley/Tichfield) (**WEL 39**) – Despite the welcome assurance at WEL 39, that a Sustainable Urban Drainage System (SUDS), to a standard acceptable to the Environment Agency will be used at Welborne and that the downstream flooding impact will be assessed in due course, the inescapable fact, is that **to date**, the effect of Surface Water Run off from Welborne on the Rivers Wallington & Meon has still not been assessed, despite repeated requests over the past 4 years, that this be done. This failure is considered an unacceptable shortcoming of the current Plan, particularly given the well documented flooding risk that already exists, to Wallington in particular, for whom the last “Severe Flood Warning” was as recent as Dec 2012.

IMPACT ON EXISTING RESIDENTS – It is extremely disappointing to note, that there is no overarching Welborne Policy that relates to the impact on existing Residents. All the local Community Groups most affected by WELBORNE, (Wallington, Knowle, Funtley & Wickham) together with the Fareham Society and CPRE (Hants) remain totally opposed to development on this scale, which far exceeds that required to satisfy Fareham’s affordable housing needs. There is similarly widespread concern within the Wards of Fareham North & Fareham East, as it is widely believed that the quality of life for existing residents in these areas of the Borough will be adversely affected by Welborne. Traffic congestion will worsen, air quality will suffer as a direct consequence and traffic noise will increase. It is particularly disappointing to note that within all the Welborne Plan documentation, there is not a single palliative measure that seeks to address the adverse effect of Welborne on **existing** Residents. A case in point, would perhaps be a firm commitment to seek M27 Noise reduction measures, which would benefit both existing and Welborne residents alike.

CONCLUSION – It is frankly inconceivable that the Welborne plan can be considered SOUND when thus far, neither the resultant traffic impact, nor the downstream Flooding risk, have been assessed, when it’s financial viability in terms of infrastructure provision, remains so uncertain and given that so many of the Core Planning Policies have yet to be adequately addressed.

REPRESENTATION 4

SUSTAINABILITY APPRAISAL/HABITAT ASSESSMENTS – Both documents very clearly demonstrate that Welborne will have a negative impact, with very little mitigation possible. Specifically, the destruction of almost 1,000 acres of prime agricultural land has not been adequately justified, nor has the true impact been adequately captured within the SA, a great deal of which is based on medium or low levels of confidence, due to insufficient data (**SA 2.5.2 refers**).

There is for example, scant regard paid to the fact that the majority of this land is either Grade 2, or 3a/3b and the impact the loss of this land will have on farming, future food production capacities and the disturbance to wildlife across the Welborne site.

Accordingly, it is submitted that FBC have demonstrably failed at both the Core Strategy and Local Plan stages, to explain the “exceptional circumstances” on which

the decision to sacrifice this land is based. The land East of the A32 is recognised as being of High Landscape Sensitivity (**SA 9.2.12 and Fig 9.1**) and yet, incongruously, some of this land is earmarked for Employment B8 use. (Warehousing) (**5.3**). The extent to which Welborne becomes a “sustainable development” is directly linked to the degree of self containment that is achieved and whilst the need to balance land allocation between housing and employment is fully understood, the Plan currently allocates some 20 hectares to employment use (**5.3 – 5.5**) It is of concern that such a high percentage (50% of this total) is earmarked for B8 use, given that the latter contributes so little in employment terms and yet has the potential to be so intrusive on the landscape.

SETTLEMENT BUFFERS – Measures to prevent coalescence with Knowle, Wickham, Funtley and Fareham are implicitly required (**WEL 2 & WEL 5**) and yet despite repeated representations over several years, that a 50m wide buffer at Funtley for example, is entirely ineffective and therefore unacceptable, this derisory size of buffer strip remains in the final version of both the SA and the Welborne Plan. (**3.62**). The rationale being offered, is that to increase the size of the Buffer zones would necessitate an increased in housing density. There is of course an alternative solution that is conspicuous by its absence, namely to accept that it would reduce the total housing numbers available at Welborne. (In terms of housing numbers, it should be noted that the SA still refers to, 6,500 whilst the local Plan talks in terms of about 6,000).

THE “KNOWLE TRIANGLE” – This is a “Ransom Strip” parcel of land, that is not currently owned, by the two major (Welborne) Landowners and which importantly, lies under the jurisdiction of Winchester City Council (WCC), rather than FBC (5.94). This piece of land was always intended as a “Green Buffer” (Para 5.29 of the WCC Plan refers) and for it to be enclosed as a fenced Playing field, is contrary to both the letter and spirit of the WCC Plan. As a “Green Buffer” zone it had the potential to contribute towards the SANGS deficit that currently exists and thus the Sustainability argument for Welborne. Use as a fenced playing field, has changed the “open and rural nature” of this land, which was specifically designated as such, “in order to prevent changes that would urbanise its undeveloped character”

CONCLUSION

By its own admission, large parts of the Sustainability Appraisal are lacking in firm data. The proposed Settlement Buffers are inadequate and fail to satisfy Core Policies within the Welborne Plan. The Self Containment data is entirely aspirational and it is disappointing to note that the previous target figure of 40% has now been removed and not replaced, from the Publication version of the Plan. The SANGS provision is already in deficit and this could worsen still further, dependent upon which layout is chosen for J10 and the resultant “Land Take” from Fareham Common. Accordingly, it is submitted that there are too many fundamental flaws in the evidence base, for Welborne to be considered a “Sustainable Development” and accordingly, the Plan cannot be considered SOUND at this juncture.