



# Wallington Village Community Association

Registered Charity No. 1038479

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The Planning Inspector

Ref: SDA 2/2011

c/o Planning Policy Department  
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## **CORE STRATEGY/NORTH OF FAREHAM SDA – REPRESENTATION.OBJECTION**

1. Wallington Village Community Association (WVCA) is a Community Group with charitable status, of which some 80% of Village residents are members. Accordingly and having consulted widely within the village, this letter reflects the views of over 400 members, the vast majority of whom are totally opposed to the SDA/Core Strategy proposals in their present form.

2. WVCA believe that the Core strategy submission made by Fareham Borough Council (FBC) is neither sound, justified nor effective, for the following reasons:

- a) The consultation by FBC has been woefully ineffective, resulting in the vast majority of Borough residents having little grasp of the scale and impact of the SDA.
- b) For several years there has been a presumption by FBC in support of the SDA; alternative options have not been properly considered and the case for building on a prime Greenfield site has not been justified.
- c) It is not based on robust evidence, in that prior to endorsement by FBC, neither the traffic impact of the SDA nor the downstream flooding risk to Wallington, had been quantified.
- d) It is contrary to the “Cities first” principle, which promotes the economic regeneration of Portsmouth and Southampton in the first instance.
- e) It fails to demonstrate how, when and by whom the infrastructure will be provided; indeed the vast majority of the infrastructure required to support what is a new town the size of Petersfield, has yet to be even costed, let alone are the funding streams in place.

## **BACKGROUND**

3. For several years the rationale behind the SDA was the Partnership for Urban South Hampshire (PUSH) derived aspiration to grow the economy of the South Hants region. Given that PUSH is not an elected body and conscious perhaps of the presentational sensitivity of Councillor S WOODWARD being both the Chairman of PUSH and the Executive Leader of FBC, the Core Strategy was “re-badged” in Nov 2010 as being necessary “to satisfy Fareham’s affordable Housing requirement.”. This requirement is not adequately justified within the Core Strategy submission.

4. As is the case for most of Southern Hampshire, Fareham is already over-developed and in the past 18 years the housing stock has grown by some 7,500 units. This has exacerbated the existing Infrastructure shortfalls and resulted in there being a significant number of heavily congested roads/Junctions, particularly in the Northern, Eastern and Central Wards, which are precisely the areas that will be worst affected by the proposed SDA.

In similar vein the local Motorway network, specifically in the vicinity of Junctions 10 & 11 is already heavily congested for much of the day and the Highways Agency predict that this section of the network will be at capacity by 2016, just when the SDA development is due to start. Currently there are no plans in place to address the existing highways shortcomings, let alone cater for the massive increase in traffic volumes that the SDA will itself generate.

#### REQUIREMENT FOR THE SDA - ECONOMIC

5. Fareham is the 2<sup>nd</sup> least deprived areas in the whole of Hampshire (HCC data – multiple deprivation levels) and there is no economic need/justification for either the SDA or the J11 Business Park. The latter, which frankly has a tenuous relationship with the SDA and is proposed in an area designated as being of “Special Landscape Quality”, is some 2 miles from the centre of the SDA and is more likely to add to commuter congestion on the M27, than to contribute to the sustainability of the SDA.

Unemployment rates in Fareham reflect this lack of deprivation as compared to the Cities of Southampton and Portsmouth and the rest of Hampshire in general. Given the importance of sustainable development, there is we submit, a compelling case for focusing this re-generation effort where it is most needed, **which is not Fareham.**

#### REQUIREMENT FOR THE SDA – AFFORDABLE HOUSING

6. The figures at Appendix 2 to the Core Strategy, imply a shortfall (excluding the SDA) of 526 units by 2016 and a target figure of 100 Affordable Homes per year in the period 2016 – 2030. In total therefore this equates to an overall need of some 1,500 - 2,000 affordable homes. Assuming that affordable housing is indeed the rationale behind the SDA and given that all local authorities have an obligation to provide such homes, it is perhaps telling that Fareham is the only Authority in Hampshire that finds it necessary to develop an SDA of up to 7,500 homes in order to satisfy its affordable housing requirement. We submit that there is a need to further examine and indeed balance the need for “Affordable Housing” (which is potentially inflated by multiple entries on “Housing Waiting lists” across numerous authorities) against the impact on existing residents; in summary, **there is a limit to which an already congested region can sensibly grow.**

The Affordable Housing rationale for the SDA, is however contradicted within the Core Strategy (para2.2) which assumes a population increase of 24,000 (22%) presumably due to inward net migration, over the period. The clear implication from this, is that the SDA, as the name implies, is a strategic, PUSH derived vehicle with which to grow the economy of South Hampshire, which for presentational purposes, is purported to be necessary for affordable housing.

Within the Core strategy, alternative means and locations for satisfying this requirement have been given scant regard. Options such as utilising unoccupied housing stock, houses surplus to MOD requirements post 2016 and previously submitted proposals for 5,000 homes in the Stubbington Gap have neither been tested nor consulted upon (para 5.80 refers)

## TRAFFIC IMPACT

7. Clearly a New Town of some 7,500 houses (which is nearly 4 times larger than Fareham's affordable home requirement), will, regardless of how self-contained it is designed to be and regardless of whatever means are employed to try and reduce car usage, is going to generate very significant volumes of additional traffic. This will massively impact on an already congested M27 and local road network, the impact of which has yet to be determined.

Hampshire County Council (HCC) as the local Highways Authority have commissioned studies into the traffic impact of the SDA and "the Emerging Transport Strategy for the SDA" (Aug 2010) recognises "the issues and challenges" that the SDA will bring (Corporate speak for : "Houston, we have a problem here"). Currently however, the strategy can perhaps be best described as being at "an embryonic stage", it recognises the issues and problems, but offers no solutions whatsoever.

Critically, the software with which to model the traffic impact of the SDA (South Hampshire Transport Model) will not be available to HCC until later in 2011. Accordingly therefore, what FBC have done, is to endorse the Core Strategy/SDA in Nov 2010 without taking any account of the traffic congestion it will inevitably generate. **We submit this is unsound if not irresponsible.**

Bus Rapid Transit (BRT) is a laudable but unproven aspiration, on which massive expectation has been placed. The reality however, is that BRT is not currently funded and given that construction of the primary access route to/from the SDA to J11 of the M27 has now been deferred until 2021 at the earliest, BRT will, for the first 5 years have to run on an already congested local road network. Even when the primary access is completed post 2021, BRT will still have to negotiate what is already a massively congested route from J11 to the future "transport interchange/Hub" at Fareham station – Bus **Rapid** Transit, it will never be, given that even today, the above 2 mile route, takes over 20 mins. at peak times and will be even worse in 10 years time.

## DOWNSTREAM FLOODING RISK

8. Wallington Village has been for many years and indeed remains prone to flooding, the most recent incident being in 2000, when some 43 properties were flooded. Largely in response to this incident and somewhat ironically, a major scheme of Household level flood mitigation measures involving over £250,000 of Central Government monies, will begin next month.

The Wallington floodplain extends both above and below the M27 and covers large swathes of land on either side of the river. Notwithstanding that the Developers intend to implement a sustainable Urban Drainage System (SUDS), the reality is that this system is unproven and has yet to be evaluated or approved by the Environment Agency (EA)

Of greater concern to Village Residents however, is the fact that due to the immaturity of the SDA plans, the downstream Flooding risk to Wallington cannot be quantified by the EA, as neither the SDA or J11 Business Park footprints, nor the route of the primary access road to the SDA from J11 are known.

## SDA CONSULTATION

9. In late Jan 2011, local Community Groups conducted their own “Street Survey” in Fareham town centre and questioned at random, 173 Borough residents. Of those questioned, 46% had not even heard of the SDA, a further 41% were completely unaware that the SDA involved building a new Town of some 7,500 houses and 78% were opposed to the proposal.

The above results very clearly indicate that Public Consultation both prior to endorsement of the SDA on 18 Nov and subsequently has been completely ineffective and the inescapable fact is that most Fareham residents have absolutely no understanding of the impact and consequences of the SDA.

Specific examples of what has been a flawed consultation process are as follows:

a. Having included a “Do you support the SDA – Yes/No question in their original “Corporate Vision Questionnaire”, FBC then issued a Press Release on 16 Dec, announcing the withdrawal of the online Questionnaire and the discounting of all inputs received; allegedly because it “had been hacked into”. The reality is that this was a Questionnaire, launched by FBC, without seeking details of the home address of the person responding to the Questionnaire. Presumably, it was withdrawn, because it included the views of Residents in Knowle & Wickham (who will be massively impacted upon by the SDA but who live outside the Borough) and because the results were not to their liking.

b. The “Corporate Vision” Questionnaire was “re-launched” on 4 Jan 2011, but **without** the previous Question 1 – namely: Do you support the SDA – Yes/No. By virtue of doing this, not only did FBC deny Borough Residents, for a 2<sup>nd</sup> time, the opportunity to vote on whether they supported the SDA or not, but their indifference to Public Opinion was such that the Questionnaire was re-launched without the questions having been re-numbered. By 20 Jan 2011, further questions had been removed from the Questionnaire, which now begins at Question 5. Patently these continuing alterations to the Questionnaire completely undermine its validity and more importantly, cast serious doubts as to the probity of FBC. There have, quite understandably, been a number of formal complaints to FBC over the “Questionnaire debacle”.

c. The formal notice regarding publication of the Core Strategy for Public Consultation appeared in the Portsmouth Evening News in early Dec. This stated that copies were available in various Libraries and gave details of how to make representations. In the case of the main Fareham Library, this massive tome (with no Executive Summary) was secreted away in the Reference Library on the 1<sup>st</sup> Floor; hardly a serious attempt at engaging the public in consultation.

d. FBC have laid great store on the results of the “E Panel Survey(s)” conducted over the past 18 months or so. Based on 960 E Panel members, of whom 415 responded and not all in support, this represents less than 1/2 of one percent of Borough residents and is neither statistically valid nor indeed a representative sample. To further compound matters, the questions asked were themselves misleading. At the start of the SDA consultation period in mid Dec 2010, FBC were keen to expand membership of the E Panel. By mid Jan however, those apply to join were rejected, ostensibly on the grounds that a Consultation was underway. This inconsistency implies an attempt to manipulate membership of the E Panel membership.

## PUBLIC OPPOSITION TO THE SDA/CORE STRATEGY

10. Contrary to the views expressed by FBC there is **very considerable** local opposition to the SDA, which can best be summarised as follows:

a) **Letters/E Mail objections to FBC – some 500**

(248 Objections had been received prior to 10 Dec 2010 and given that FBC are Unable/unwilling to reveal the number of Objections since the start of their 6 week “Consultation period”; an assumption of “a similar number” in the period 10 Dec – 31 Jan 2011 would not be unreasonable.

b) **CPRE postcards (opposing the SDA) received by the Housing Minister – 1,985**

c) **Petition Signatories (Fareham East/West Wards) – 1,400**

(These are but 2 of the 15 Wards in Fareham Borough)

d) **Petition Signatories (North Fareham) – 1,000 plus**

(A single Ward and collected in only 3 weeks)

e) **E. petition to FBC – 550 and ongoing**

(Interestingly, the E. Petition which was only started in early Jan, has now recorded significantly more objections to the SDA than the total number of E. Panel members who supported the proposal in the first instance. )

Additionally, a “Vote of No Confidence” in the manner in which FBC were handling the SDA Process and consultation generally, was forwarded to FBC in early Jan 2011 and signed by the following local Community Groups and: (WVCA Ltr of 6 Jan 2011 refers)

Wallington Village Community Association  
The Fareham Society  
The Wickham Society  
Wickham Parish Council  
Knowle Village Residents Association  
Funtley Village Residents Association

The above listing comprises ALL of the Community Groups and Amenity Associations that will be directly impacted upon by the SDA and we would submit, provides a very clear indication as to both the massive unpopularity of the New Town proposals and the grave concerns over what has been a fundamentally flawed consultation process.

## PUBLIC/FIRE SAFETY

11. It is understood that due to traffic congestion issues, Hampshire Fire Service have grave concerns over their ability to respond (from Fareham Fire Station) to incidents within the SDA within the statutory 8 minutes and believe that a Sub station within the SDA may be required. Furthermore, if the BRT Transport Hub goes ahead, then Fareham Fire Station will need to be demolished and replaced. One can but surmise whether seemingly peripheral, but actually directly related costs such as these have been factored into the SDA viability analysis.

## SUMMARY

12 As outlined at para 2 of this letter, we submit that the Core Strategy submission is unsound, in that it is neither justified nor effective. There are no contingencies, merely an overriding presumption in favour of the SDA throughout the document. Scant regard has been taken of alternative options and we do not believe the New Town is necessary. Consultation on the Core Strategy has been **woefully ineffective**, resulting in Borough residents at large, being blissfully unaware of the impact of the SDA, which will be particularly adverse on existing residents.

13. We wish this letter to be passed in full, to the Planning Inspector appointed to examine FBC's Core Strategy/SDA submission.

14. Furthermore, we also request that WVCA be allowed to address the Planning Inspector when He or She considers the submission of this unnecessary, over large, hugely unpopular and ill-conceived Core Strategy/SDA proposal.

David Walton

For:

Wallington Village Community Association