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The Planning Inspector
Planning Policy Department
Fareham Borough Council
Civic Offices
Fareham
Hampshire
PO16 7AZ

30th January 2011

NORTH OF FAREHAM SDA/CORE STRATEGY – REPRESENTATIVE RESPONSE

Dear Sir/Madam.

I write to you on behalf of Funtley Village Society and Residents Association in response to the North of Fareham SDA/Core Strategy.

We have been co-ordinating our responses with other local groups and so there will be a common thread to our opposition to the proposed development of the SDA.

However we address the issues and put forward our case in a logical and robust manner from a Funtley perspective.

Funtley Village Society and Residents Association is a local group open to all residents of Funtley Village. We have in the past organised various meetings detailing our objections to the original proposal of the SDA/Core Strategy. As part of our feedback regarding a petition from residents of North Fareham, we found that there was overwhelming opposition to the proposed SDA (details given later).

1. We the residents of Funtley object to the core strategy submission made by Fareham Borough Council (FBC) on the grounds that it is not justified, not effective and most importantly not sound.

Our reasons are as follows:

- I. The consultation by Fareham Borough Council has been woefully ineffective. Most of our residents have little idea of the scale and impact of the SDA. One local meeting, not very well publicised, attended by the council leader in 2010 does not in our view represent adequate consultation.
- II. Funtley residents as whole have been totally opposed to the idea of the SDA from the very outset. Any presumption by FBC of lack of opposition by Funtley residents has been totally misplaced. We believe other viable alternative options have not been properly considered. We do not believe the case for building on a prime Greenfield site has been justified.

- III. Robust evidence in our opinion has not been provided. There has been no traffic assessment of the impact of the SDA on North Fareham and Funtley, prior to endorsement by FBC. A proper environmental assessment on the impact on Funtley has not been carried out – for example many of the properties on Funtley Road facing the fields north of Funtley already suffer from downstream flooding from the fields.
- IV. The core strategy does not fit in with the “Cities first” principle, which promotes the economic regeneration of Portsmouth and Southampton in the first instance.
- V. The core strategy singularly fails to explain and demonstrate clearly how, when and by whom the infrastructure will be provided. To build a 'Fareham New Town' the size of Petersfield without effectively costing it seems to be quite unsound. The idea that private developers are going to cough up the funds, taking into account the current economic situation seems to barely credible.

TIMELINE & BACKGROUND

In 2004/5 the SDA first promoted as a regional area for growth. On Thursday November 3rd 2005 a public meeting was held in Funtley Social Club, attended by the leader of the council Cllr Sean Woodward. He gave a presentation on the SDA. There was overwhelming opposition to the SDA, but we were informed this was part of the South East Plan and FBC had little room for manoeuvre. Further meetings were held prior to the Inspection in Public on the South East Plan/SDA in 2006/7. As a concession to Funtley residents a small gap was included in the final submission between the village and any new development.

From 2005/6 to 2009 the SDA was then promoted as an engine for growth.

Now it is being promoted to meet the needs of affordable housing and the current waiting list within Fareham Borough. This requirement is not adequately justified within the Core Strategy submission.

The Solent area between Portsmouth and Southampton including Fareham is already over-developed and in the past 18 years the housing stock has grown by some 7,500 units. The existing infrastructure is already struggling to meet the current levels of traffic and as a result the local road network in North Fareham and beyond is very heavily congested. This is the exact area, which will be worst affected by the proposed SDA.

This also applies to the local Motorway network, specifically Junctions 10 & 11. It 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. There are no current plans in place to address the existing congested traffic and no thought has been given to the impact of a huge increase in traffic that the SDA will in addition generate.

REQUIREMENT FOR THE SDA - ECONOMIC

Fareham is the 2nd 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.

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 regeneration effort where it is most needed, which we believe is NOT Fareham.

REQUIREMENT FOR THE SDA – AFFORDABLE HOUSING

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 we believe the council are using 'sledgehammer to crack a nut' in that there is only so much development this already congested area can sensibly grow at.

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

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 has 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. 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 believe that this aspect of the core strategy is unsound.

IMPACT ON FUNTLEY VILLAGE

Funtley Village, along with Knowle Village, Wallington and Wickham will be directly affected by the building of the SDA. Some of the properties facing the fields to the north of Funtley already suffers from flooding downstream from the existing farmland. There has been no proper environmental assessment of the impact of the SDA on the effects of downstream flooding on those affected properties in Funtley.

For over 20 years FBC had a policy of NO development north of the M27. Many residents of the whole of North Fareham, Knowle Village and Wickham as well as Funtley, enjoy the use of the open spaces for walking, recreation and the wildlife (deer and the like) and have done so for many generations. This development would have a massive impact on the overall quality of life on all the local residents

Many residents have moved to this area precisely because of the 'quality of life' aspects.

We are not against development. We however believe the proposed SDA would have a disproportionate effect on Funtley and North Fareham re traffic, lack of infrastructure, and environmental impact as detailed previously. We do not believe that other more suitable alternatives have been explored fully, which would not have the same major impact on local residents and taxpayers.

SDA CONSULTATION

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 2nd 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 1st 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

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). For Funtley on just two successive Sundays we collected over 190 signatures from Funtley residents objecting to this, excluding those who had already signed the petition at the local shop Holly Stores. We were not able to cover the whole village in two Sunday afternoons.

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:

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

SUMMARY

As stated at the beginning of this letter we contend that the Core Strategy submission is unsound, in that it is neither justified nor effective.

There has been no real consultation with local residents in that many are completely unaware of the SDA or its potential impact, which would adversely affect the resident of not just Funtley but the whole of North Fareham, Knowle & Wickham and destroying the character of the whole area.

No viable alternatives and strategies looked at and a presumption that the FBC knows best. There are no proper contingencies and funding in place.

Can you please pass this letter and its contents in its entirety, to the Planning Inspector appointed to examine FBC's Core Strategy/SDA submission?

We also request that Funtley Village Society & Residents Association be allowed to address the Planning Inspector when they consider the submission of the Core Strategy/SDA proposal.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'E Morell', written over a faint circular stamp or watermark.

Edward Morell
For on behalf of
Funtley Village Society and Residents Association.