

**The Welborne Plan EiP**  
**Issue 3: Site, Setting, Allocations, Design Principles and Conservation Areas**  
**WEL3 to WEL8**

**On Behalf of Bovis Homes Group LLP (WP475)**

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## Response to Inspector's Questions

### Introduction

1. This written statement sets out a response to The Welborne Plan Inspector's Issues and Questions (August 2014), including a response to Questions 3.2, 3.3, 3.4, 3.5 as these questions go to the heart of Bovis's concerns regarding the soundness of The Welborne Plan. Bovis has an option agreement with the landowner (Mr Hedges) affected by the employment land designation and J10 of the M27 motorway works. Bovis has sought to become a member of the Welborne Standing Conference, which meets approximately 4 times a year to discuss issues and progress of the delivery of Welborne. At the time of writing Bovis has not been permitted to sit on the conference to contribute to the delivery of Welborne.

### Question 3.2

2. Bovis considers that the constraints to development and delivery of Welborne are not yet fully understood, assessed and analysed on the basis that it is only through the rigour of an environmental assessment and an outline planning application documentation that can quantify, assess and mitigate the identified impacts of a scheme of this magnitude on issues well known to the promoters of Welborne. Welborne is one of the largest new settlements being promoted across the country and it is only at the outline planning application stage with all the supporting technical documents that the significant constraints to development will be properly assessed, alternatives considered and mitigation measures identified. The 'what, where and how' of delivering with certainty this significant new settlement is therefore wholly questionable at this stage in the absence of this information and is therefore unjustified.
3. For example, there is a SINC that will be severely impacted by the J10 of the M27 highway works and could substantially compromise the validity of such a designation given the extent of works required to deliver an upgraded J10 solution to service Welborne. In addition the threat to adequately servicing the new development relying on the J10 of the M27 works is also highly questionable and is dealt with elsewhere in other written statements on behalf of Bovis. Landscape, ecology, heritage and environmental assets and concerns can not yet be afforded the appropriate protection as this has not yet been quantified through appropriate assessment and potential mitigation measures.

**Question 3.3**

4. Bovis considers that the proposed land use for employment purposes is not appropriate or justified and the current Welborne Plan offers no flexibility to address changes in circumstances as the settlement materialises over time and further more up to date evidence arises. More is said on this point in answer to Issue 4. Of particular concern is the fact that the delivery of Welborne requires an accord with all the landowners as it would not be feasible for a landowner of a small part of the settlement to commit to the costs of the preparation of the 20 or more documents required to address and mitigate any necessary issues as they are relevant and necessary to a smaller part of the scheme.

**Question 3.4**

5. Bovis considers that the need to be consistent with the Strategic Framework Diagram offers no flexibility as any change that varies from it will no longer be consistent with it. Dalton Warner Davis's experience in other areas where there is a Masterplan or Framework Diagram with land uses and road alignments/ requirements set down in policies is that any variation to the Diagram can result in a refusal of planning permission at a later date. For this reason there needs to be greater flexibility in the Strategic Framework Diagram or consistency with it removed entirely from Policy and the development plan at this time.

**Question 3.5**

6. Bovis is concerned about the mechanisms for delivery of this vast new settlement given the varied land ownerships, the absence of an accord between the parties and the need for smaller landowners to prepare the same level of information, planning documentation and environmental assessment as the primary landowners of Welborne. Without a single promoter of the settlement the certainty and delivery of Welborne could be threatened by disagreements between landowners, between landowners and the 'ownership' of technical documents required to address relevant issues associated with Welborne, and with landowners aspirations about the land uses of the 'allocated' land as suggested on the Strategic Framework Diagram.
7. WEL4 does not address the environmental assessment requirements that any future application of Welborne will need to face, which is the cumulative impact of development that is likely to arise from the delivery of all of the development proposed for Welborne. Without an environmental assessment of the whole from the outset, a sound and robust determination of the smaller parts can not be safely determined and would contravene Environmental Impact Assessment Regulations.
8. Paragraphs 3.49 to 3.51 refer to third party landholdings outside of the promoting landowners which rather lightly glosses over the limited consultation with landowners within the Welborne defined boundary and the absence of some of these landowners from the Welborne Standing Conference and therefore information and influence regarding significant issues that will impact on the delivery of Welborne. It seems unjust that the landowners impacted by the employment allocation, the long term allocation of this plan, safeguarding of this land until phase 5 of the

Welborne settlement (2030-2036) that its interest cannot be afforded a seat at the Standing Conference table for the delivery of Welborne.

9. The employment allocation landowners are potentially being held to ransom without influence, whilst the residential land and values are secured by other landowners who are members of the Standing Conference.

#### **Amendments to the Welborne Plan**

10. The reference to development schemes being considered to the Strategic Framework Diagram should be deleted as the delivery of the framework remains uncertain as stated in the Framework Diagram.
11. The delivery of Welborne in accordance with the Framework Diagram is also unjustified as it exceeds the timeframe of the adopted core strategy (2011-2026) and will therefore need to be regularly reviewed to ensure it is consistent with the core strategy and delivery timescales. It must therefore be reviewed every 5 years for this reason.