

The Welborne Plan EiP
Issue 4: Economy and Self-Containment WEL9
On Behalf of Bovis Homes Group LLP (WP475)
 26th September 2014

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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 4.1, 4.2, 4.3, 4.4, 4.6 and 4.7 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 4.1

2. Bovis is concerned that the amount, location and delivery of employment floorspace is overly optimistic, is unlikely to achieve self-containment due to the over reliance on car borne and road access particularly in the light of the evidence contained within the Welborne Employment Strategy Final Report (November 2013) by Wessex Economics. This document highlights the trend in office floorspace with occupiers and investors preferring town centre locations *linked to public transport and other services* (italics are DWD addition) and therefore a decline in business park locations and that there is a significant stock of vacant office space in the sub-region. In reality therefore any early employment delivery outside of retail and community uses (ie schools) is likely to be for warehouse and industrial uses. Such uses prefer road linked locations on the strategic road network as Welborne will become when and if the J10 of the M27 works are implemented.
3. The Welborne Employment Strategy indicates that at best the employment offer for Welborne might eventually be a business park offer or in terms of lower density employment uses a distribution park for B2 and B8 uses given what might become a well connected strategic road network location. Such significant industrial and distribution uses are likely to conflict with the residential design aspirations for Welborne.
4. The Welborne Employment Strategy also identifies and highlights that the ability to adequately predict with certainty the market realities of the employment offer over a 20 year period is not possible to predict (Section 3 – page 10). The delivery of employment uses 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.

5. It is for all of the reasons set out in this document that Bovis maintains that the Welborne Plan is not sound, it is not possible to determine whether the objectives for self-containment can be achieved and that the inflexible requirement to conform with the Strategic Framework Diagram places an unreasonable constraint on the use and development to the north of the M27 corridor at J10.

Question 4.2 and 4.4

6. Bovis considers that the scale of employment provision is not justified given the size of the fully developed Welborne community of 6,000 homes by 2036 (Welborne Concept Masterplan Phasing Plan June 2014). As a settlement, 6,000 homes is not significant in comparison to settlements including Fareham with a population figure of approximately 97,000 and Waterlooville of 20,000. It is questionable and the Welborne Employment Strategy highlights the uncertainties associated with long term forecasting for employment purposes. There is the same amount of employment floorspace proposed in Fareham a location five times the size of Welborne which is proposed within the same timeframes, which is likely to be more attractive to B1 office investors given the rail and bus transport facilities available.
7. There appears to be no fall back position should employment development not materialise and no flexibility for alternative uses. The “what, where and when” can not be adequately determined at this stage of the Welborne Plan for all of the reasons identified in the Welborne Employment Strategy document. The recommendations in the document’s Section 8 highlights that the 20 hectares of land will ensure long term continuity of supply post 2026. The Strategic Framework Diagram will effectively sterilise development of this land for at least 15 years if not longer. The Welborne Employment Strategy on page 39 highlights that it is anticipated that it will take the full life time of the Welborne Plan to 2041 and longer to deliver this scale of development. It predicts that 5,500 sqms of employment floorspace per annum after 2022 (J10 of M27 opening) for the 100,000 sqms of floorspace to be delivered. It states:

‘To put this in context an average of 34,500 sqms pa of employment floorspace was completed in the 12 years in the PUSH area as a whole.’

8. In answer to the Inspector’s question in paragraph 4.4, the proposed mix of employment uses is a best guestimate as it is not possible to quantify the need and certainty of delivery for this scale of employment uses in a location that is not yet established. It is therefore not justified in terms of soundness.
9. 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.

10. 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.

Question 4.3

11. Bovis considers that there has been little consultation with the landowners affected by the employment land location shown on the Strategic Framework Diagram and little justification for it given the long term timescales associated with the delivery of this use up to and beyond 2041. It is clear that the only consideration for the location of the employment land is the proximity of it to the J10 of the M27 location. Segregating all employment uses to the outskirts of the new settlement is not a sustainable solution to mixed use development and communities in line with the NPPF objectives.
12. There are many existing homes and businesses, which are all acceptable in the vicinity of the M27 corridor and it is therefore not sound to bar all future residential uses from this corridor and exclude such uses where the housing need may be greater in the short to medium term with other settlements more sustainably connected to public transport than Welborne.

Question 4.6

13. The Inspector's question 4.6 highlights the key soundness problem with the Welborne Plan as highlighted by the Welborne Employment Strategy, which identifies that there is significant over supply of vacant office supply in the PUSH area in locations that are more sustainable and established that Welborne, which means that there is no certainty that the office floorspace can and will be delivered in the short, medium or even the longer term given the reliance of the location on the car and road access (ie no train station). It would be unsound given this evidence for the Council to seek to provide this earlier equally it is unsound to sterilise up to 20 hectares of land for a use that may never be viable or sustainable even in the longer term.

Question 4.7

14. It appears to Bovis that the Council does not have a fall back position regarding delays to the J10 of the M27 works or the further delay to the demand for more B1 office or other employment floorspace given the evidence set out in the Welborne Employment Strategy. It is therefore unjustified. Welborne will be an untested market place for employment floorspace and in the early years once the motorway junction works are complete it will be mainly attractive to the large scale bulk warehouse occupiers which will conflict with the residential quality aspirations for Welborne. The employment strategy for Welborne is unsound and lacks any certainty regarding deliverability, realism and flexibility on the basis that there is no certainty that it can be delivered in the long term post 2041.

Amendment to WEL 9

15. Bovis are seeking the following amendments to Policy WEL 9:

- Residential development will be considered as part of a mixed use development incorporating employment uses to delivery a sustainable and balanced community.
- The Council will monitor the delivery of employment land and consider further residential development in accordance with a rolling 5 year review programme.