

The Welborne Plan EiP
Issue 11: Delivering the New Community including Viability, Monitoring and
Review WEL41 to WEL43

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 11.3, 11.5, 11.7 and 11.8 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 11.3

2. Bovis considers that it is not clear how and when various elements of infrastructure are needed to support the Welborne new settlement and nor can this be known at this time without the benefit and rigour of an outline planning application with environmental assessment to assess the scale of development, the infrastructure required, how this will be paid for, when it will be delivered and what amount of development can be delivered in the absence of what infrastructure. Mitigation related to any arising impacts is not yet known.
3. The Council's own evidence highlights that there is no certainty about the timescales and amount of employment floorspace that might be secured at Welborne given the unpredictability of forecast modelling over such an extensive timescale (up to and beyond 2041). The delivery mechanisms for Welborne are therefore not justified.

Question 11.5

4. Bovis considers that it is not justifiable to safeguard land for the long term given the evidence submitted within the Welborne Employment Strategy and the inflexibility this creates for the delivery of Welborne. The Council fails to consider what the alternative land uses could be should employment demand not materialise other the short, medium or longer term. Alternatives must be considered particularly if any employment uses only attract industrial and warehouse users which may significantly impact on the settlement quality proposed.

Question 11.7 and 11.8

5. Table 11.1 only has one monitoring indicator for employment uses of 60,000 sqms by 2036. This clearly highlights that up until this year, the Council is unlikely to expect significant delivery of employment floorspace as identified in its Phasing Plan. The Welborne Employment Strategy highlights on page 39 that 5,500 sqms of employment floorspace would be needed per annum to achieve the 100,000 sqms of floorspace allocated for Welborne. If the J10 works are not likely to be completed until 2022, the appropriate monitoring target should be 5,500 sqms per annum from 2023 onwards to determine how much and what employment floorspace is being delivered.
6. It is also ambitious for a scheme of this magnitude with so much uncertainty and of such a scale to be capable of delivering homes by 2016/17 in the absence of an outline planning permission and certainty about the infrastructure required and mechanisms for securing funding and delivery. On all large schemes it can take a minimum of 4 years to begin on site based on the following indicative timescales:
 - Pre-application consultation and preparation of outline planning application and Environmental Assessment – Approximately 1 year
 - Determination of outline planning application and resolution to grant at committee – approximately 1 year or longer
 - Negotiation of S106 Agreement to engrossment of the document even with the Heads of terms agreed at determination – approximately 1 year or longer subject to the need to return to committee for further resolutions.
 - Submission of reserved matters and discharge of pre-commencement conditions, S278 and S38 Agreements – Approximately 6- 9 months per reserved matter.
7. It is therefore clear that housing development is unlikely to start before 2018 with the first completions 12-18 months later say 2020. The housing trajectory for delivery of housing on this site is therefore circumspect and overly ambitious. Further housing land may also be required to make up the short fall of delivery and therefore flexibility of land uses must be catered for in the Welborne Plan.
8. The triggers for review of the Welborne Plan and monitoring are not justified or sound given the scale of the proposed new settlement, the delivery of required infrastructure and the overly ambitious timescales associated with the delivery of housing in 2016/17 when there is no outline planning permission or S106 Agreement in place.
9. 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.

10. 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.
11. 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 WEL 42

12. It is therefore the view of Bovis that Policy WEL 42 is not sound and should be deleted in its entirety.