

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

#### **Core Policy 4 – Meeting Our Housing Needs**

*Why not legally compliant or unsound or fails to comply with duty to co-operate?*

Core Policy 4 is unsound in as much that the reference to 'Valley Park' in the accompanying table of strategic development sites within the South East Vale Sub-Area, for delivery of housing during the plan period, refers to a housing supply figure of just '2,550' dwellings. This figure conflicts with the VWHDC's own evidence base, where Appendix B of Topic Paper 3 - Strategic Sites Selection – applicable to Valley Park (Site Ref. TPS 056) states under the heading 'Site Selection Methodology (2014)':-

***“Assessment concluded that evidence work has tested a figure of 2,550. The local plan should provide for the delivery of ‘at least’ 2,550 homes to allow for an element of flexibility with the potential for additional development beyond 2031.”***

Core Policy 4 also states that development at strategic allocations will be supported where they meet the requirements set out within the Development Site Templates shown by Appendix A and in accordance with policies of the Development Plan as a whole. The Site Template for Valley Park states under 'use' that the site can accommodate ***“at least 2,550 homes, subject to masterplanning”***; however, the aforementioned table within the main policy does not recognise that that the site can accommodate 'at least' 2,550 dwellings.

Even the VWHDC's previous Housing Delivery Update version of the Local Plan (Consultation Draft, February 2014), read in conjunction with the Site Information Tables attached to Appendix 5, stated that Valley Park could accommodate 2,550 dwellings with potential for a further 575 after the year 2031 (and this excludes the Site Information Table's assumptions about a further 1,025 dwellings that could be accommodated within the site towards the north-west: North West Valley Park). This results in the current Plan actually effectively reducing provision at Valley Park, when the evidence base and the scale of the site would suggest significantly more dwellings.

The Council is aware that the promoters of this allocation have been working closely with them on proposals for the site which will form the basis of a future outline planning application. This has involved extensive capacity-testing of the allocation area, and this has demonstrated that the site has capacity for significantly more than 2,550 dwellings. A public consultation exercise was undertaken in June 2014 on a scheme of around 4,000 dwellings on Valley Park (excluding North West Valley Park), and further work since then, in consultation with the Council and their design advisers, has resulted in a figure well in excess of 2,550. Our understanding from officers is that the figure of 2,550 has been included because this is the Council's estimate of the number of dwellings that are likely to be delivered on the site within the Plan period. Whilst we accept that it is reasonable for the plan to make reference to the amount of housing that can be delivered during the plan period, to plan positively, and to ensure a comprehensive approach, with adequate infrastructure provision, there should be an acknowledgement that significantly more than 2,550 dwellings can be achieved on this site.

Consequently, Core Policy 4 is not 'justified' judged against Paragraph 182 of the NPPF.