

Stage 2 Matters and Questions**Matters 8.1, 9.1 and 10.1 – Site Specific Allocations**

Dandara Ltd has the following comments to make regarding the soundness and deliverability of strategic housing allocations set out in Policy CP15 of the emerging Local Plan:

- (1) Green Belt** – We have previously demonstrated under Matter 5 that the Council has not provided sufficient evidence to demonstrate that insufficient land is available outside the Green Belt to accommodate the number of new homes required to meet the VoWH's objectively assessed housing need given the great weight provided in the NPPF to retain the openness, function and integrity of the Green Belt (strategic housing allocation sites 1, 2, 3 and 4);
- (2) AONB** – Likewise, we have previously demonstrated under Matter 6 that the Council has not provided sufficient evidence to demonstrate that the 'exceptional circumstances and public interest' NPPF tests have been satisfied to justify significant housing development in the AONB which is afforded the highest level of national protection due to its landscape and scenic beauty qualities which will be inherently harmed (strategic housing allocation sites 12 and 13);
- (3) Grove Airfield** – Grove Airfield was originally allocated as a strategic housing site following the adoption of the current VoWH Local Plan in 2006. Despite benefitting from an allocation in the Local Plan, the site did not receive a resolution to grant outline planning permission until December 2013. Negotiations regarding the Section 106 legal agreement remain ongoing and the planning permission is still awaited despite the Council resolving to grant consent over two years ago. The delay in signing the Section 106 legal agreement is indicative of a site which has consistently failed to deliver the number of new homes projected in the adopted Local Plan and has contributed in no small part to the five year housing land supply shortfall experienced over the past three years in VoWH. We understand that the continued delays are a result of the significant financial burdens placed upon the development due to infrastructure requirements and the Section 106 package which cumulatively exceed £100 million. We also understand that there are a significant number of beneficiaries under the land ownership agreement with a growing discord between the realisable land value and the monies to be paid to infrastructure and the Section 106 legal agreement. We would strongly recommend that the Inspector satisfies himself that the infrastructure and Section 106 financial obligations placed upon the Grove Airfield development are realistic and do not render the scheme unviable (strategic housing allocation site H8) and that the site is realistically deliverable in the timeframes set out in the Plan;
- (4) Sustainability** – There are a number of strategic housing allocation sites which are not located in sustainable locations and will increase reliance upon the use of the private car to access core services such as schools, shops and employment opportunities. In particular, the strategic housing allocation at Milton Heights (site 9) is poorly related to an existing settlement and would effectively represent an isolated form of development adjacent to a junction of the A34 and does not achieve the core NPPF principles of place making and delivering sustainable communities.