

Examination Statement on behalf of Catesby Estates Ltd

Matter 5: Spatial Strategy, Matter 8: The Natural Environment, Matter 9: Dunsfold Aerodrome and Matter 10: Site Allocations

5th May 2017

Turley

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Will Cobley
will.cobley@turley.co.uk

Client
Catesby Estates Ltd

Our reference
CATW3003

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1. Introduction

- 1.1 This hearing statement has been prepared by Turley on behalf of Catesby Estates Ltd, who have residential development interests in Farnham and Alfold.
- 1.2 This statement responds to the Inspector's Matters and Issues, which have been published ahead of the hearing sessions into the Waverley Part 1 Local Plan. It specifically addresses Matters 5 (Spatial Strategy), 8 (The Natural Environment), 9 (Dunsfold Aerodrome) and 10 (Site Allocations), which are due to be discussed at the hearing sessions opening on 27th June 2017.
- 1.3 Our client is also part of the Waverley Housing Forum (WHF), which has submitted separate hearing statements for matters 1, 2, 3 and 4.

2. Issue 5: Spatial Strategy

Q5.1 - Paragraph 3.2 of the Plan states that most of the new development will be located in and around the main settlements of Farnham, Godalming, Haslemere and Cranleigh which have the best available access to jobs, services, housing, community facilities and so on. How can the Dunsfold Aerodrome allocation be justified against this spatial strategy?

- 2.1 We consider that Dunsfold Aerodrome does not provide a sustainable location for the substantial quantum of housing proposed within the Plan. The allocation is at odds with the requirements of the Framework and the Council's own Spatial Strategy, as set out in the settlement hierarchy under Policy ALH1 and Policy SP2.
- 2.2 The Strategic Housing Market Assessment (SHMA) from December 2015 provides clear evidence of the urgent need for both open market and affordable housing, which is predominately within or immediately adjacent to the largest settlements of the Borough namely Farnham, Haslemere, Godalming and Cranleigh.
- 2.3 The West Surrey SHMA 2015: Waverley Addendum published in December 2015 confirms that housing need (affordable housing) for Farnham alone totals 117 dwellings per annum, representing circa. 23% of the total Borough wide annual housing target. This highlights the clear displacement of current need relative to provision proposed within the Plan.
- 2.4 This position is reinforced by the Council's own Sustainability Appraisal at paragraph 6.3.9 which states:
- "...,there would be a high proportion of housing in the east of the borough, some distance from where housing needs are greatest; and there would be pressure on the local highway network, for example the A281."*
- 2.5 Overall we consider that the approach to deliver over 25% of the total minimum housing requirement for the Borough in this location on one site self-evidently contradicts the Council's own development strategy, the clear available evidence and the Government's golden thread of national planning policy to promote sustainable development.

Q5.2 - To what extent does the apportionment of housing in Policy ALH1 reflect the needs of the settlements themselves?

- 2.6 We broadly support the Plan's vision to locate most development in and around the main settlements of Farnham, Godalming, Haslemere and Cranleigh as the evidence shows that these settlements have the best range of jobs, services and other facilities and are clearly the most sustainable in the Borough. This approach to development complies with the provisions of the National Planning Policy Framework.
- 2.7 Setting aside the proposed new settlement at Dunsfold Aerodrome, which we consider below, most development in the Plan is directed towards Farnham (2,330 dwellings). Of this 550 dwellings are proposed at new strategic sites, which equates to just 12.3% of the overall new strategic housing allocations within the Part 1 Plan. On the basis that

Farnham is identified as the most sustainable settlement across the Borough in the Council's Sustainability Appraisal and the Waverley Settlement Hierarchy - Factual Update 2012, we consider that a new greenfield apportionment of only 12.3% is too low.

- 2.8 This view is reinforced when one considers that Cranleigh will see 1,015 (or 22.8%) new homes proposed on strategic sites (some of which have planning permission in part) and the provision of 2,600 homes at Dunsfold Aerodrome accounts for 58.4% of the strategic site allocations, with both of these areas recognised as less sustainable than Farnham.
- 2.9 We therefore contend that Policy ALH1 is **unsound**, with the apportionment of actual Greenfield allocations not reflecting the clear needs of the settlements themselves.
- 2.10 It is widely appreciated that the NPPF directs Local Planning Authorities to “boost significantly” the supply of housing and to plan positively at paragraph 47 and 157 respectively. The Council's choice to only allocate/identify sufficient land to meet their minimum identified housing target does not adhere to the main thrust of the NPPF and the Government's initiative of 'Planning for Growth'.
- 2.11 Accordingly, we consider the distribution of housing to each settlement identified at Policy ALH1 should be seen as minima and the words “at least” should be added before each of the settlements. This would ensure that the plan is flexible enough to respond to changing needs over the plan period (i.e. without the need for a major review if the housing total delivered significantly exceeds the provision made in the policy) and ensure the soundness of the Plan in this regard. At present we consider that the Plan has **not been positively prepared** as advocated by National Policy and is therefore **unsound**.

Q5.3 Does the apportionment of development in the Plan have proper regard to the quality and capacity of the road network, and the quality and capacity of public transport? What are the principal transport improvements and projects that are required for the implementation of the Plan?

- 2.12 We would draw the Inspector's attention to the Transport Assessment Scenarios for the Distribution of Housing Growth - Stage 4 Report prepared by Mott MacDonald. This assessed the apportionment options and the resultant impact on sustainable transport and movement within the Borough.
- 2.13 The options considered were as follows:

Table 7.2: Number of New Homes in the Development Scenarios

Scenario	Farnham	Cranleigh	Dunsfold Aerodrome
1	3,800	1,800	0
2	2,600	1,200	1,800
3	2,100	1,050	2,600
4	1,800	650	3,400

- 2.14 The assessment concluded that “*scenario 1 of the development scenarios that were subject to public consultation by WBC is considered the most sustainable.*”

2.15 It also notes that scenarios 2, 3 and 4 have increasing numbers of new homes at Dunsfold Aerodrome, which are considered to give corresponding reductions in the level of transport sustainability. Again a clear indication that significant development at Dunsfold Aerodrome is unsustainable.

2.16 It is therefore clear that the Council's current spatial strategy set out at Policy ALH1 is **not sound**, on the basis that it is **not justified** and is contrary to the evidence.

Q5.4 - As Farnham is the largest town, with a good range of shops and services, excellent access to the national road network and good rail and other public transport links, why hasn't more housing land been allocated there in the interests of a sound sustainable development strategy?

2.17 The Sustainability Appraisal, which has supported the submission version of the Plan, identified Farnham as the largest settlement, having a population of approximately 39,000 and the necessary services to accommodate growth. In addition Farnham is relatively unconstrained by national landscape designations and the Metropolitan Green Belt, especially when compared to both Godalming and Haslemere.

2.18 Farnham's suitability to accommodate additional growth is also evidenced by the Transport Assessment - Scenarios for the Distribution of Housing Growth - Stage 4 Report, which concludes that:

"Based on the above analysis, Farnham is considered to be the most sustainable location overall for provision of new homes given its current transport options and the potential to address local car trips by transferring them to other modes, followed by Cranleigh and then Dunsfold."

2.19 This position is also reflected within the Waverley Settlement Hierarchy - Factual Update 2012.

2.20 The Land Availability Assessment identifies 'suitable' greenfield sites to deliver 900 dwellings, focused to the north and west of the town; however, the Sustainability Appraisal notes at 6.3.16 that there is feasibly the potential to support a higher degree of growth (i.e. it could be appropriate to support growth at sites that were considered unsuitable in the LAA, on the basis of strategic considerations).

2.21 We consider that the current Plan is **unsound** as it plainly ignores the conclusions of the evidence, which support higher levels of growth in Farnham, as the most sustainable settlement in the Borough.

Q5.5 - Will the Plan provision for Farnham fall significantly short of identified need, for both market housing and affordable housing?

2.22 As highlighted above, the West Surrey SHMA 2015 Waverley Addendum sets out a range of outputs for the five sub-areas in Waverley. These sub-areas are the same as those used in the previous SHMA for the Borough. Four of the sub-areas are based around the main settlement areas of Cranleigh, Farnham, Godalming and Haslemere and the final area covers the remainder of the Borough.

- 2.23 The SHMA Addendum shows that net housing need for affordable dwellings in Farnham totals 117 units per annum, which in itself almost represents the entire annual proportion of units to Farnham as identified in Policy ALH1. Further given that Policy AHN1 (Affordable Housing on Development Sites) pursues the provision of a minimum of 30% affordable housing on development sites, a housing target of 390 dwellings per annum would be required in Farnham to meet affordable need alone. This would also assume that all of the development was delivering affordable housing at a minimum of 30%.
- 2.24 We therefore consider that an additional proportion of housing should be distributed to Farnham to address this clear housing need. In its present state this matter renders the Plan **unsound** as it has **not been positively prepared**, nor has it been justified through an appropriate evidence base.

Q5.6 - Having regard to the spatial strategy, why hasn't more housing been allocated to Godalming and Haslemere?

- 2.25 We broadly agrees with the Council's assertion that there are limited opportunities to expand the other main settlements of Godalming and Haslemere through greenfield development on the edges owing to the constraints of the Green Belt and the Area of Outstanding Natural Beauty (AONB).

Q5.7 - Is Cranleigh, which is a considerably smaller town, a suitable location for the volume of growth proposed?

- 2.26 We are concerned over the committed and proposed level of development at Cranleigh. There is a clear flaw in directing too much new Greenfield development to a settlement where housing need is lower than elsewhere in the Borough, as shown by the SHMA Addendum, and which in itself is less able to accommodate significant amounts of new development because it is the least sustainable of the four main settlements.
- 2.27 Cranleigh also has significant highway constraints, which have been raised in numerous representations to the Plan. The proposed amount of development will clearly exacerbate these issues, which include congestion and poor air quality.
- 2.28 We contend that development at Cranleigh should be more proportionate to its scale and should therefore be reduced.

Q5.8 - Does the Plan strike the right balance in its apportionment of development to the other settlements?

- 2.29 Whilst it is a sound planning principle to focus the majority of the new development required around the main urban areas, the Local Plan also has to ensure that the pattern of development reflects the need in order to be sustainable and ensure that the vitality and function of local rural communities is maintained, as required by paragraph 28 and 55 of the NPPF.
- 2.30 As such, for lower tier settlements the housing requirement should be seen as a minimum and therefore should not preclude appropriate, sustainable development from coming forward over the Plan period.

Q5.9 - If the Plan had to accommodate a greater housing requirement, for example through a higher OAN or the accommodation of unmet need, what would be the implications in terms of the spatial strategy?

- 2.31 The matter of a higher housing requirement is considered through the Hearing Statements submitted by the WHF. However, the Sustainability Appraisal (SA) is clear at paragraph 6.3.11 that “*the need to distribute growth in a sequential fashion, in-line with the established hierarchy, is an important consideration when examining the ‘reasonableness’ of a given distribution option*”. The sequential approach adopted by the SA is as follows:
- Built-up areas / previously developed sites;
 - Greenfield sites around main settlements; and
 - Greenfield sites around other settlements.
- 2.32 With this in mind, the SA has already considered the level of growth that can be accommodated both within the main settlements (690 dwellings (i.e. the capacity of all suitable LAA sites)) and within other settlements (20 dwellings (i.e. the capacity of all suitable LAA sites)). It is therefore not feasible for any additional growth to be accommodated within the built areas without significant loss to existing employment provision. This would be contrary to the prescriptions of proposed policy EE2: Protecting Existing Employment Sites and not sound.
- 2.33 In regards to previously developed sites outside of settlements, the LAA identified ‘suitable’ sites to deliver 2,737 dwellings; however there are important question marks regarding the suitability and deliverability of Dunsfold Aerodrome, ear marked for up to 2,600 dwellings. As noted extensively above and also through the ‘*Dunsfold Aerodrome: Delivery Rates Assessment*’ prepared for WBC by Troy Planning + Design, the delivery of 2,600 dwellings over the plan period is highly optimistic and should be seen as a ceiling, the SA rightly notes at paragraph 6.3.15 that “*there remains a need to consider the possibility of the site being redeveloped at a lower density (than that assumed to be suitable through the LAA)*”. As such it is considered that any additional growth could not be accommodated on PDL sites outside of settlements.
- 2.34 This places further emphasis on the need to allocate sufficient greenfield sites in the Plan around the other main settlements.
- 2.35 As set out above it is clear, and logical, that any additional growth should be apportioned mainly to the settlement of Farnham given its identification as a top-tier settlement and the provision of services and highway capacity. This would maintain the current impetus of the spatial strategy that seeks to focus development to the main settlements of the Borough.

3. Issue 8: The Natural Environment

Q8.1 - Is the approach towards the different SPAs sound, having regard to mitigation proposals? What are the implications of the spatial strategy for nationally / internationally important habitats? Has the Council considered the implications of the Wealden High Court judgment of 20 March 2017?

3.1 No comment.

Q8.2 - What is the timetable for the review of the AONB boundary? Is the retention of the AGLV unnecessary duplication, and what are the implications of retaining this designation for the delivery of sustainable development?

3.2 Policy RE3 (Landscape Character) notes that the “*same principles for protecting the AONB will apply in the Area of Great Landscape Value (AGLV) , which will be retained for its own sake and as a buffer to the AONB, until there is a review of the Surrey Hills AONB boundary*”.

3.3 We believe that Policy RE3 is **unsound** because it conflicts with national policy.

3.4 The policy seeks to apply the same principles for protecting the AONB, which is a national designation made by Natural England, to the AGLV, a local designation, until there is a review of the Surrey Hills AONB. This policy is both inconsistent and incompatible with the National Planning Policy Framework, which only applies such strong protection to AONBs, National Parks and the Broads at paragraphs 115-116.

3.5 Clearly, affording the same degree of protection to land covered by a local designation is not justified, especially if a review of the boundaries is yet to take place, and where it has the potential to prevent sustainable development coming forward in an area where there is an acute need for housing to be delivered.

Q8.3 - What would the effect of the spatial strategy be on the AONB, both visually and in terms of movement?

3.6 No comment.

4. Issue 9: Dunsfold Aerodrome

Q9.1 - What is the realistic volume of car trips that can be expected from the site, given the probability of car-based movements for commuting and shopping trips and the potential for car movements for educational trips (there being no proposed secondary school)?

4.1 No comment.

Q9.2 - On which communities will the main environmental effects of additional traffic movement from Dunsfold Aerodrome fall, having regard to the above?

4.2 No comment.

Q9.3 - What are the implications for the road network, including:

- **the A3**
- **the A281 and other routes into Guildford**
- **the character of roads in the countryside, AONB and AGLV**
- **roads in other districts?**

4.3 Correspondence dated 21st April 2017 between Surrey County Council and the Planning Inspector in relation to current Appeal APP/R3650/V/17/317/1287 has been published on the Council's Online Planning Register.

4.4 The letter highlights the fact that the County Council raised an objection to the development on the following grounds – *“The development is not in a location where the need to travel and distance of travel can be minimised, and where the use of sustainable modes can be maximised, and would therefore be contrary to Core Planning Principle 17, bullet point 11, and paragraph 34 of the NPPF and Waverley’s saved Policy M1 from its current Local Plan.”*

4.5 We are not aware that this objection has been resolved by the applicant or the Council.

4.6 This letter goes on to note that *“At the time of writing, there is still much to be agreed in respect of delivering a watertight solution, and at the moment the developer needs to formally demonstrate an ability to provide a perpetual (ie Sustainable) solution. It remains for the Inspector to convince himself at the Inquiry that whatever Section 106 is in place at that time is strong enough to overcome these fundamental concerns.”*

4.7 We therefore contend that in its current form the proposed development is not deliverable, nor does it represent sustainable development and without a robust Section 106 will have a detrimental impact on the surrounding highway network.

Q9.4 - In terms of transport, what is the timing of the “package of measures” in the Infrastructure Delivery Plan” (including any outside the Borough) and should this be in the Local Plan?

- 4.8 The uncertainty in terms of delivery of the key infrastructure necessary to enable the full 2,600 dwellings allocations is highlighted in the Infrastructure Delivery Plan (Section 5, Page 18) that identifies many of the items with costs “tbc”.
- 4.9 This is of significant concern and clearly raises questions over the deliverability of the scheme during the Plan period.

Q9.5 - What degree of:

- **environmental mitigation**
- **traffic mitigation**

could realistically be expected from these measures?

- 4.10 No comment.

Q9.6 - What key non-highway infrastructure measures are required on or outside the site, what are the risks to delivery and the implications for the trajectory from the site? (see also question 3.2).

- 4.11 From experience across the country, it is often apparent that Local Plan allocations do not deliver the level of housing or rate of delivery that was originally anticipated when allocated. This is an issue often exacerbated when an authority is overly reliant on the delivery of housing through a large strategic site, where the rate of delivery often slows due to the complexity of providing the necessary infrastructure and the impact of the prevailing market conditions at that time.
- 4.12 We consider that the plan places an over reliance on a single, large strategic allocation, which causes significant displacement of need. This one site represents circa. 26% of the overall housing requirement and is considered grossly optimistic given that the current application for the site, which has been called in by the Secretary of State, only proposes 1,800 dwellings.
- 4.13 In this regard paragraph 5.22 – 5.23 of the proposed Plan explains the failings of the proposed allocation and in particular the recent Secretary of State determination for a scheme of 2,600 dwellings on the site, which cited fundamental constraints to its delivery.
- 4.14 In paragraph 5.23 of the Plan the Council confirm that the fundamental issue of transport impact has not been resolved or indeed explored and as a consequence the Council has no credible evidence to confirm that the level of housing being relied upon can in fact be delivered.
- 4.15 In paragraph 5.22 of the Plan the Council explains that the primary justification for the allocation is the Framework’s requirement for councils to meet their OAN, and the preference for releasing brownfield land over greenfield.
- 4.16 We would argue that the need to meet the OAN does not generate an automatic right to release inappropriate sites that have known constraints and are incapable of delivering the required housing.

4.17 Officers advised Members in a report to Full Council dated 19th July 2016 that:

“the inclusion of the site as a major allocation in the Plan is still subject to the provision of appropriate infrastructure to mitigate the impact of development, particularly improvement to the road network”

(paragraph 31.16)

4.18 This position is reinforced by Officers in the recent Officer Report to application WA/2015/2395 and remains the case.

4.19 In relation to the housing trajectory set out in Appendix A of the Plan, this places significant emphasis on the delivery of Dunsfold Aerodrome to meet the mid to long-term annual housing targets, especially between years 2022 to 2030 where 260 dwellings per annum are predicted at this site.

4.20 Should an issue arise where the strategic site as a whole or in part could not, or is not delivered it would put the delivery of the Strategy and the whole Plan at risk, having serious impacts on the Borough.

4.21 Further, this position is compounded by the key infrastructure issues that have not yet been satisfactorily addressed:

- The need for a fully subsidised bus service to be provided and funded by the development. There is no indication as to how much this service will cost to implement and maintain and to what extent the Dunsfold scheme is able, from a viability perspective, to deliver such a service. This is a key issue as noted by Surrey County Council in its consultation response to the application (see Page 55 of the case officer report attached at Appendix 3). Surrey County Council states that ‘It is crucial that the need for a “watertight” method of securing the perpetual provision of bus services at the level proposed (or similar) is integral to any decision that Members might make on this application.’;
- Delivery of a number of the associated access/highway improvements required to enable the scheme to come forward are affected by third party landownership including registered common land. The letter attached at Appendix 4 from Surrey County Council confirms this position; and,
- Additionally West Sussex County Council has raised concerns regarding highway impacts that require mitigation none of which appear to have been addressed or indeed considered by the Council (see letter attached at Appendix 5).

4.22 All of the above matters that remain uncertain and unresolved relate to the planning application proposal for 1,800 dwellings and not the full 2,600 dwelling allocation that is proposed in the Plan. Consideration should therefore be given to meeting this shortfall at other sustainable sites in the locality.

4.23 Further the uncertainty surrounding the delivery of the key infrastructure necessary to enable the full 2,600 dwellings to be delivered is also highlighted in the Infrastructure

Delivery Plan (IDP) (Section 5, Page 18) that identifies many of the items with costs “tbc”. Given the significance of the Dunsfold allocation to the Council’s housing delivery strategy the uncertainty in relation to these key pieces of infrastructure is a significant concern.

- 4.24 In addition, in relation to the Waste Water Treatment for Dunsfold the IDP notes that this site gives rise to the most significant impact on both treatment and network capacity. Whilst the developer is proposing to address the matter of foul drainage via an onsite treatment works there remain significant concerns regarding its deliverability given the current position taken by the Environment Agency.
- 4.25 In summary we would argue that the provision and delivery of 2,600 units over the plan period is highly questionable and unsound especially when the current (called-in) application only proposes 1,800 dwellings in any case.
- 4.26 As such we believe that the Council must allocate further land to provide flexibility and ensure that the Plan meets its housing delivery obligations.

Q9.7 - What justification is there for regarding this site as mostly “previously developed land” given that the majority of the site is open and grassed?

- 4.27 No comment.

Q9.8 - What will be the effect on the setting of the AONB, particularly important panoramas from viewpoints within the AONB?

- 4.28 No comment.

Q9.9 - Would the range of employment and retail and social facilities proposed for the site allow for an adequate degree of self sufficiency or would the scale of development be inadequate to support a critical mass of facilities?

- 4.29 No comment.

5. Issue 10: Site Allocations

Q10.1 - Coxbridge Farm, Farnham (SS1): the addition to the text regarding SPA mitigation measures is noted, but what practical measures are anticipated?

- 5.1 The SHLAA (October 2014) and LAA (2016) states that the only way this site could be shown to be deliverable in the short/ medium term is for local or on-site SANG provision as an integral part of the development subject to the approval of Natural England.
- 5.2 The Town Council is aware of a potential SANG to serve this development, provided by the landowner on adjoining land in association with the Bishop's Meadow Trust. As a result the site is in two ownerships and it cannot be certain the two land owning interests are entirely aligned arising from the restrictive covenants which exist between Surrey County Council and the owners of Coxbridge Farm.
- 5.3 Furthermore, as the delivery of the scheme is contingent upon the delivery of SPA mitigation measures, the absence of any practical mitigation measures is concerning and creates significant uncertainty surrounding whether such measures can indeed be delivered.
- 5.4 We consider that there is uncertainty over whether the site could support 350 homes due to the heritage context and its location on the edge of town. This coupled with a lack of evidence regarding the practical SPA mitigation measures raise questions over the deliverability of the site for the quantum shown.

Q10.2 - Land west of Green Lane, Farnham: Policy SS2 is unsound as it defers part of the decision "to the satisfaction of the mineral planning authority"; the decision belongs to the local planning authority. Is this requirement likely to have implications for the timing of the delivery of housing on the site?

- 5.5 The proposed allocation site lies within the mineral safeguarding area, which indicates where viable, safeguarded minerals are likely to be present. This purpose, which is set by Minerals Safeguarding, is supported by the Surrey Minerals Plan 2011 Core Strategy (Policy MC6), the National Planning Policy Framework (Paras 143 & 144) and National Planning Policy Guidance (Para 003).
- 5.6 In order to meet the requirements of the Surrey Minerals Plan, there is an expectation that Local Planning Authorities will not normally permit other types of development (non-minerals) within the MWCA in order to avoid needless sterilisation of the mineral resources, unless the safeguarding issue has been appropriately addressed.
- 5.7 We acknowledge that prior extraction of minerals can be planned into the development of sites. In some circumstances this can also contribute to the overall sustainability of the development by reducing the need to source off-site construction materials or export some ground material. However any conclusion that prior extraction is compatible with the proposed development would need to be evidenced.
- 5.8 To establish the viability of prior extraction and its potential extent, we believe that further evidence should be able to demonstrate that this has been considered and is

feasible. Until such time that this is provided it is contended that the above site is not deliverable and should be removed from the Plan as a proposed allocation. In any case and unless the mineral deposit can be proved unworkable/ unviable we question the current trajectory of delivery in the first five years of the plan period.

Q10.3 - The Woolmead, Farnham (SS3): what is the basis for concluding that 100 dwellings in addition to replacement retail floor space can be achieved on this site?

5.9 No comment.

Q10.4 - Land at Horsham Rd, Cranleigh (SS4): what is the basis for preventing Phase 2 from commencing before Phase 1 has been “substantially completed”? In practice, what would this mean? Would it impede delivery or progress with site development?

5.10 No comment.

Q10.5 - Land south of Elmbridge Road and the High Street, Cranleigh (SS5): is it appropriate for the policy to dictate which part of the site should be delivered first? What would be the implications of this requirement for development progress? Does the policy reflect the terms of the planning permissions that have been granted?

5.11 No comment.

Q10.6 - Land opposite Milford Golf Course (SS6): this is identified as a strategic site for 180 homes, and the amended text indicates that the land is to be removed from the Green Belt in this Plan (rather than Part 2) but this appears inconsistent with Plan 5. What SPA mitigation measures are anticipated?

5.12 We are aware that the site is not currently the subject of a planning application and as such there is no clear mitigation proposal for the scheme's impact on the SPA. This raises uncertainty over the deliverability of the scheme.

Turley Office
Southampton

2 Charlotte Place
Southampton SO14 0TB
T 02380 724 888