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**SITE ALLOCATIONS DEVELOPMENT PLAN DOCUMENT  
PROPOSED SUBMISSION DRAFT**

**REF: CHIC/16/03**

**REPRESENTATIONS ON BEHALF OF PLAISTOW AND IFOLD PARISH COUNCIL**

**JANUARY 2017**

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**SECTION**

- 1.0 INTRODUCTION
- 2.0 TESTS OF SOUNDNESS
- 3.0 LEGALLY COMPLIANT
- 4.0 CHANGES REQUIRED



## 1.0 INTRODUCTION

- 1.1 The Site Allocations DPD (SA DPD) proposed submission draft has been published for consultation purposes. The consultation process runs from 01.12.16 to 26.01.17. The document follows previous versions of the draft plan that have also been subject to public consultation. The draft SA DPD identifies and allocates sites for development within the various Parishes within the District, excluding the area within the South Downs National Park.
- 1.2 By way of background, at the same time as the District Council have been preparing their draft SA DPD, Plaistow and Ifold Parish Council have been preparing their Neighbourhood Plan. A draft Pre Submission Neighbourhood Plan has been prepared subject to identifying a housing site for the Parish. A number of alternatives are being considered to meet the allocated housing numbers, and currently, issues of deliverability are being assessed for the preferred options.
- 1.3 The housing allocation for the Parish is identified in policy PL1 of the draft SA DPD. The indicative number of houses required (“about 10 dwellings”) has been established in the Chichester Local Plan 2014- 2029, adopted in July 2015 at Policy 5. Policy 5 sets out that *“Suitable sites will be identified in neighbourhood plans or in a Site Allocation DPD.....”* The intention of the District Council is *“that the identification of sites and phasing of delivery will be determined primarily by local communities through a neighbourhood*



*planning process”.*

- 1.4 Given that Policy 5 is an adopted policy and part of the development plan, this indicative figure cannot be contested. However, the Parish Council are opposed to the allocation of the site that the District Council have allocated, and an alternative site is in the process of being allocated through the neighbourhood plan process. The District Council are aware of the progress of the Neighbourhood Plan, and the potential for alternative sites. It is submitted that the proposed allocation of the specific site (Land north of Little Springfield Farm) means the draft SA DPD fails to meet the tests of soundness set out in paragraph 182 of the NPPF.

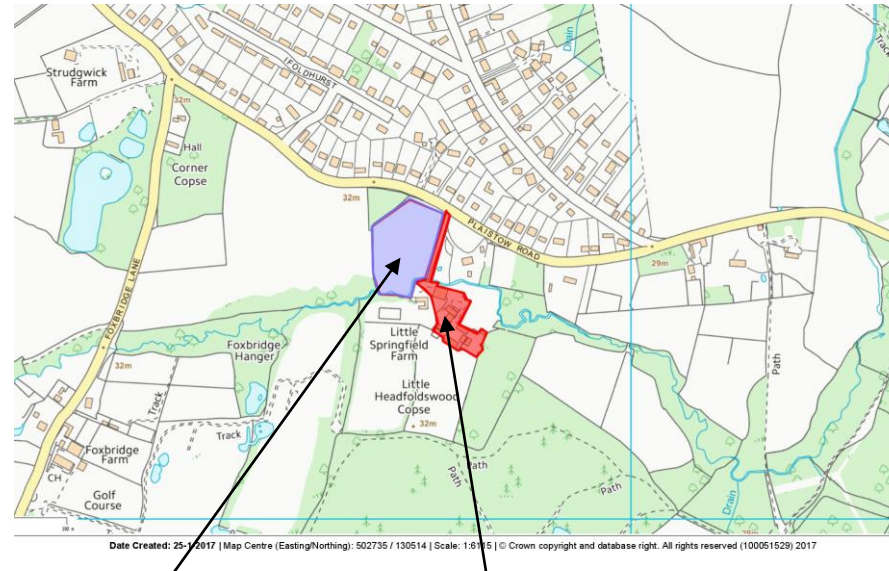


## 2.0 TESTS OF SOUNDNESS

2.1 The tests of soundness are set out in paragraph 182 of the NPPF, and a plan will be sound if it is;

- Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development
- Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence
- Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities
- Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

2.2 The Inspector's attention is drawn to the fact that the District Council propose to allocate a site known as Land north of Little Springfield Farm. The representations set out below will use evidence based on the recent appeal decision for development on Land at Springfield Farm. The two sites are separate sites, although in close proximity to each other. The relationship between the two sites and the settlement of Ifold is shown on the maps below;



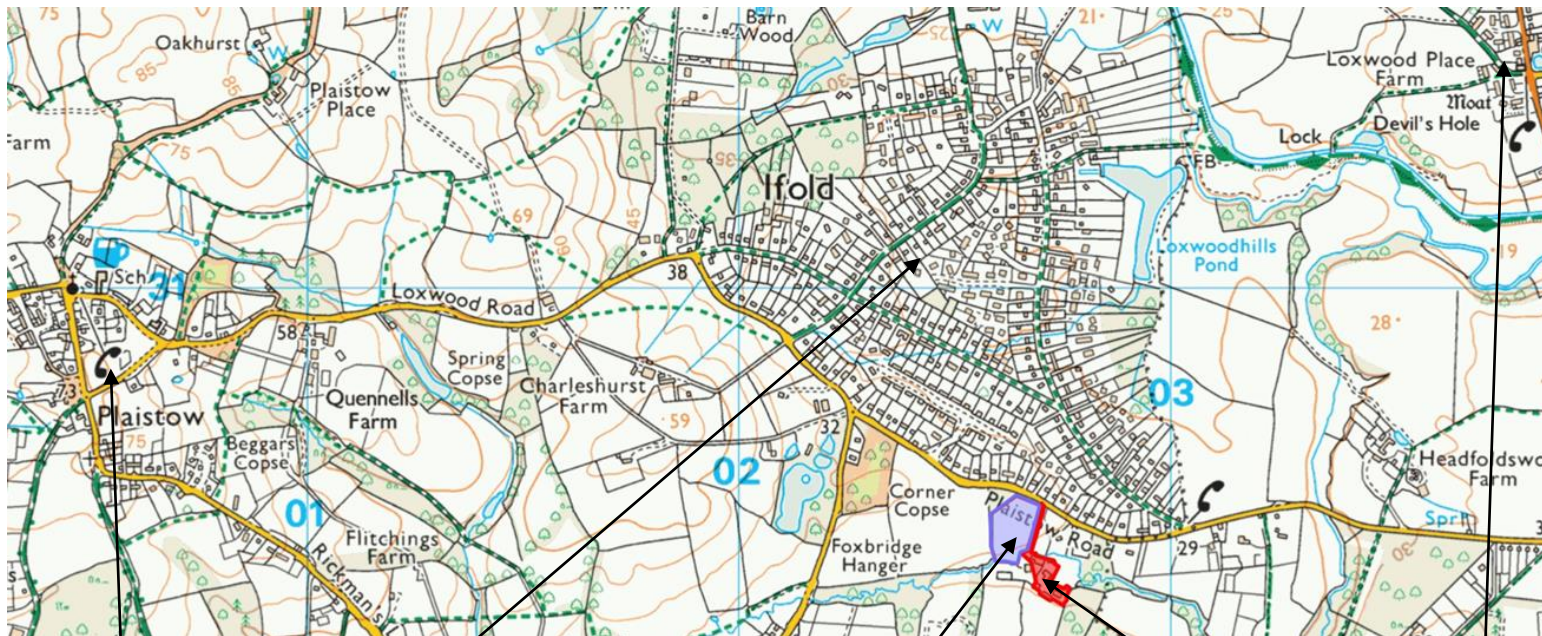
Land north of Little Springfield Farm  
(proposed SA DPD site allocation)

Little Springfield Farm  
(site of appeal proposal)

**Note- The entire field at land north of Little Springfield Farm, shown above, is in the ownership of one landowner. 0.4ha of this field is allocated in the CDC DPD refer to Map 2 IF504 (below)**



Extract from CDC SHLAA map (IF504) showing the 0.4ha proposed to be allocated at the top of field



Plaistow village

Ifold settlement

Land north of Little Springfield Farm

Little Springfield Farm

Loxwood





### **Positively prepared**

- 2.3 To be positively prepared, the draft SA DPD should be based on a strategy which seeks to meet objectively assessed development and infrastructure requirements. Given that the indicative housing requirement for the Parish has been derived from an adopted plan, and that this figure has been subject to examination and public consultation, it must be considered that the amount of housing identified in the draft SA DPD (“about 10 units”) has been positively prepared, in the sense that the number of units meets objectively assessed needs.
- 2.4 However, the Parish Council do not consider that the location for the units is the most appropriate or sustainable location, and therefore in that sense, the draft SA DPD is **not** positively prepared. This will be explained in more detail below. In addition, the adopted Local Plan identifies that sites will be allocated through the neighbourhood planning process. As the Parish Council are advancing with the preparation of the Neighbourhood Plan, this is the mechanism for the allocation of the housing site for the Parish, not the SA DPD. The District Council have been aware of the progress of the Neighbourhood Plan since 2013 and 2014, when officers joined members of the Parish Council on a village “walk about” looking at sites (although only in Ifold- officers were unable to attend the Plaistow walkabout), and as a result of ongoing dialogue, correspondence and meetings held since September 2015. The District Council have been invited to consider alternatives to the site that they propose to allocate in the light of additional and emerging evidence, but they have steadfastly refused to do so.
- 2.5 In August 2015 the landowner of Land North of Little Springfield Farm contacted the Parish Council to inform that CDC had



written to them to ascertain their willingness to develop their site. The Parish Council had not been informed by CDC they were contacting Parish landowners.

- 2.6 In September 2015, in a conversation with a consultant the Steering Group was attempting to engage for the Neighbourhood Plan, the Parish was advised that the CDC Pre-Submission deadline for the Site Allocation DPD was December 2015 and if the Parish did not meet that deadline, a site or sites may be imposed by CDC. However, the Parish Council had not been informed of this by the District.
- 2.7 At a meeting in October 2015, the Parish Council Chairman informed CDC that it would not be appropriate for the District to allocate a site or sites without the involvement and support of the community and that this should be allowed to happen through the Neighbourhood Plan process that was at that time underway.
- 2.8 The Parish Council subsequently responded to the CDC DPD consultation in February 2016. A link to the download is on the Neighbourhood Plan website;  
  
<https://plaistowandifoldparishnp.files.wordpress.com/2016/05/cdc-site-allocation-preferred-approach-development-plan-document-parish-council-response-18-feb-2016.pdf>
- 2.9 To be positively prepared, the draft SA DPD should seek to meet the housing needs set out in the adopted Local Plan. The



Development Strategy and Settlement Hierarchy for the District is set out in adopted Local Plan Policy 2. This policy identifies Plaistow/Ifold as a Service Village. Service Villages are defined as follows at paragraph 5.1 of the adopted Local Plan as;

*“Villages that either provide a reasonable range of basic facilities (e.g. primary school, convenience store and post office) to meet the everyday needs of local residents, or villages that provide fewer of these facilities but that have reasonable access to them in nearby settlements.”*

- 2.10 The Inspector will note that the Key Diagram (Local Plan page 34, Map 4.1) links Plaistow and Ifold together. The Inspector will be invited to visit both villages of Plaistow and Ifold and also refer to the settlement boundaries. The village of Ifold has no services or facilities- following the closure of the village store, there is no shop, there is no pub, no school, no medical facilities or other facility to meet the everyday needs of local residents, other than a village hall. Plaistow however has a school, shop, Church, hall, post office services, village green, children’s playground, other recreational facilities and a pub, but is outside the settlement boundary, and therefore in the countryside (or “Rest of the Plan Area” as defined in Policy 2). The Inspector will note that there is no convenient or easy pedestrian access between Plaistow and Ifold, and therefore the notional link between the two villages identified on the Key Diagram is, in reality, illogical, contradictory and confusing.
- 2.11 Policy 2 sets out that within the Rest of the Plan Area (areas outside of the settlement boundaries), development will be *“restricted to that which requires a countryside location or meets an essential local rural need or supports rural diversification in accordance with Policies 45-46”*. The District Council’s proposed allocation of the site in Policy PL1, outside the Ifold settlement boundary, in an unsustainable and inaccessible location (which will be explained further below) does not therefore follow the



adopted Local Plan strategy as set out in Policy 2.

2.12 The draft SA DPD is therefore not positively prepared.

### **Justified**

2.13 In order to be justified, the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence. The Parish Council submit that the allocation of the proposed site is not the most appropriate strategy, when considered against the reasonable alternatives. In part, this is explained in relation to the adopted Local Plan strategy and the arguments set out above. However, the District Council have ignored recent, robust and credible evidence to support **not** allocating the Land north of Springfield Farm site in policy PL1. This is in the form of a recent appeal decision on land at Little Springfield Farm, just to the south of the proposed SA DPD allocation (see map extract above).

2.14 After a call for sites at the Neighbourhood Plan Public Consultations (January-February 2016) the landowners of Little Springfield Farm (also known as the brownfield site) presented their site to the Steering Group for consideration. This site was appraised using Chichester District Council's SHLAA assessment and then evaluated by the Steering Group along with a "Second Sieve" of sites to determine which sites to bring forward into the Draft Neighbourhood Plan. At that time, the Steering Group recommended that the Little Springfield Farm site and the site at Land adjacent to Todhurst be considered for allocation.



- 2.15 Subsequently, the land adjacent to Todhurst site was discounted due to access issues (a pumping station exists in the area that provides access to the site).
- 2.16 Furthermore, an appeal decision letter was issued on 01.03.16 for the “demolition of existing industrial buildings and erection of three detached dwelling houses with associated landscaping, surfacing, car parking provision and access works” at -Little Springfield Farm (appeal ref APP/L3815/W/15/3129444, accompanying these representations). The Inspector dismissed the appeal. The Inspector’s attention is drawn to the following paragraphs;
- paragraph 20: ‘The use of the site for residential purposes and the day to day living needs of residents would require services associated with residential use including shopping, schools, doctors and other health services to name a few. None of these are directly available at Ifold and given the limited bus services available and poor pedestrian and cycle linkages residents of the development would be heavily reliant on the private car, this would be an unsustainable form of development in this countryside location;’
  - paragraph 24: ‘the proposed development would result in an unsustainable pattern of development, having regard to its accessibility;’
  - paragraph 28: ‘Whilst views into the site would be limited, the development would be glimpsed through the trees from Plaistow Road and would appear as an incongruous residential development in a countryside location. The Framework notes that the intrinsic character and beauty of the countryside should be recognised. The tight suburban form of the proposed residential development of this site would not contribute to the distinctive rural landscape character of the area;’

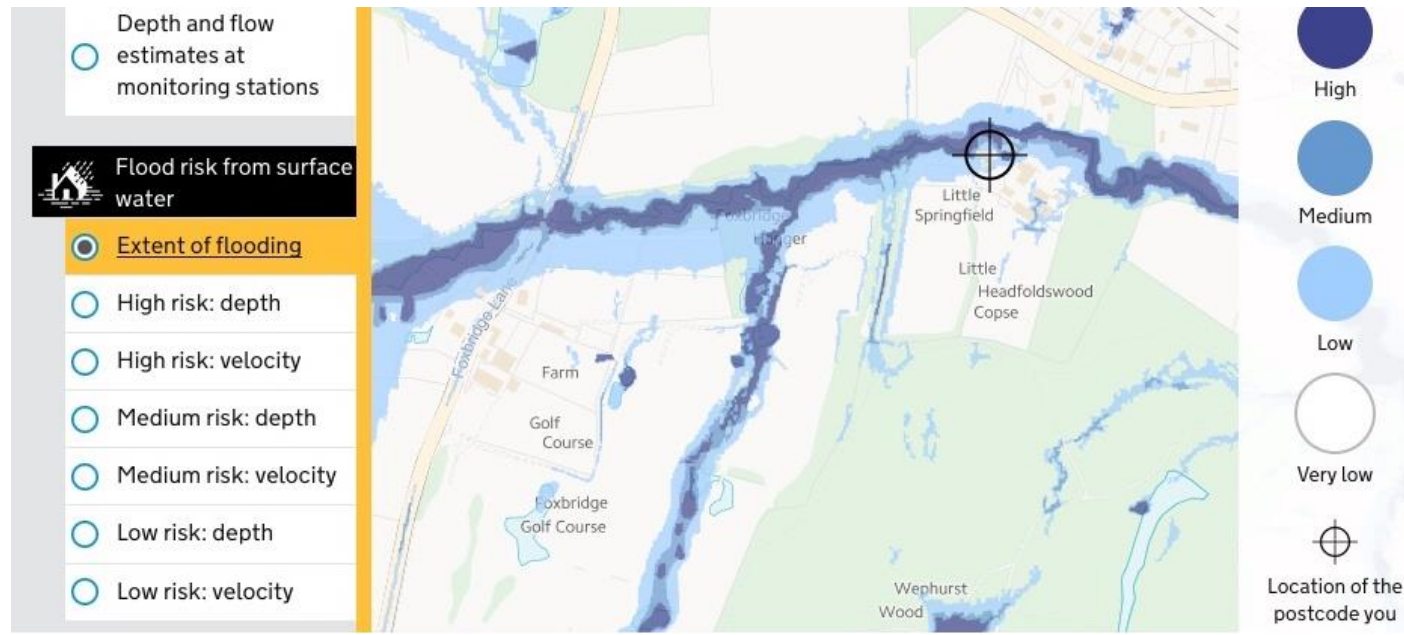


- paragraph 29: ‘I conclude that the proposed development would result in material harm to the character and appearance of the area. Consequently it would conflict with policies 1, 33 and 48 of the CLP, which seek to secure high quality sustainable development that protects the distinctive local character of the area.’

- 2.17 It is clear from the Inspector’s decision letter that the development of the site for three dwellings was both unsustainable, being outside the settlement boundary and not in a very accessible location, and also due to the impact on the character of the countryside.
- 2.18 It is therefore submitted that the proposed allocation of a site (Land north of Springfield Farm) for “about 10 units”, in close proximity to the appeal site and also outside and separated by a busy public highway from the nearby Ifold settlement boundary, and also sharing the same lack of accessibility to local services and facilities, would be as unsustainable, and have an equally, if not more damaging, impact on the character of the countryside. The proposed SA DPD site proposes to use 0.4 ha of the site with an allocation of 10 units. This gives a density of 22 units per hectare, which is a discordant density of development in relation to that existing in the nearby Ifold settlement, which is an average of 8 units to the hectare. The majority of Ifold is historically at an average of 5.6 units to the hectare. The SA DPD site is also significantly more than the three dwellings proposed in the appeal scheme just to the south. The proposed SA DPD density creates urbanization in a rural, countryside location and is detrimental to the character of the nearby settlement of Ifold.
- 2.19 It has been established that part of the land to the rear to the site is vulnerable to flooding from surface water, as identified on the Environment Agency’s published maps (below). The top (north) part, where CDC intend to allocate is clear from risk but a



development of 10 houses in this field is likely to require attenuation into the stream alongside to avoid contributing to the existing risk of surface water flooding. To attenuate within the proposed allocation of 0.4ha would make the development higher density. Therefore some of the land of the south end of the field would have to be retained for surface water attenuation, further encroaching on the countryside





- 2.20 It is for these reasons that the Parish Council decided not to allocate the Little Springfield Farm site in the draft Neighbourhood Plan, and it is why, it is submitted, that the proposed allocated site is unsuitable, based on the most recent, credible and robust evidence.
- 2.21 This conclusion in relation to the proposed allocation of the appeal site for the Neighbourhood Plan was arrived at following advice from AECOM in their Site Options and Assessment report dated August 2016. The purpose of the report was to ensure that the site selection process is robust enough to meet the Basic Conditions considered by an Independent Examiner, as well as any potential legal challenges by developers and other interested parties, and had three aims;
- A review of the evidence and methodology underpinning the site assessment process carried out by the group and advice on any further steps that may be needed to ensure it is robust;
  - To assess the results of the site assessment process so far to ensure they are justified and comply with local and national planning guidance; and
  - To make recommendations on the most suitable sites to take forward for consideration in the neighbourhood plan, and the criteria/evidence that would underpin these recommendations.
- 2.22 This report accompanies these representations and has been previously shared with the District Council, and discussed at a 5th September 2016 meeting between District Council officers (Mike Allgrove, Valerie Dobson, Sue Payne and Tracey Flitcroft) and





members of the Neighbourhood Plan Steering Group. Under conclusions and recommendations (page 25) of the AECOM report, the following comments are drawn to the Inspector's attention;

- Ifold is fundamentally a less sustainable location than Plaistow.'
- 'The NPPF...would not support any further residential development at Ifold due to the lack of services and facilities within walking distance.'
- 'It would be virtually impossible for any party, including for CDC, to argue that development at Ifold would be justified for as long as there is no shop, school or pub in the village but there is a range of suitable and available sites at nearby Plaistow. Importantly, this conclusion could/should be used in the case against the currently proposed allocation of Site 4 (Land to the North of Little Springfield Farm by CDC. In paragraph 21 of the appeal decision (for the Little Springfield Farm Brownfield site), the Inspector stated that whether or not Site 4 (Land to the North of Little Springfield Farm) was allocated was '*a decision for the plan-making process*'; AECOM agrees with this assessment, and consider that it is very likely it would not be able to be allocated through that process at present.'

2.23 As noted above, the Parish Council have been preparing a Neighbourhood Plan, and the initial version of the Pre Submission Neighbourhood Plan has been drafted and submitted to Chichester District Council for a screening opinion, prior to undertaking an SEA/SA. The initial draft Pre Submission Neighbourhood Plan included a preferred housing site for 11 units on land adjacent to The Dairy, Plaistow. Following responses from the consultees through the screening opinion process, further evidence relating to the impact of the proposed access to the site on the heritage asset (the access to the site is within a Conservation Area) and the trees and hedges on the frontage was sought. An Arboricultural Impact Assessment was commissioned by the Parish Council.



which demonstrated that the trees on the frontage were of significant amenity value and that the provision of an access could have a potentially harmful impact on them. At the time of drafting these representations, work was being carried out to explore the possibility of secondary access to the site or to allocating an alternative site (identified by the Parish as their Reserve site) for development. If the reserve site also proves to be not deliverable there is a case that Plaistow and Ifold Parish is not a sustainable location to take housing. The unlimited windfall within the Ifold Settlement Boundary is testament that the Parish has delivered on housing in a significant way (more than 90 houses have been constructed within Ifold in the past fifteen years) with no improvement to its level of sustainability.

- 2.24 The Parish Council have had a number of meetings and have exchanged correspondence with the District Council in relation to the allocation of a site for housing development. The District Council have been aware of the difficulties of the proposed District Council allocated site (explained in detail above) but have dismissed the request to reconsider their site against the reasonable alternatives that are being pursued by the Parish Council. Reasonable alternatives have been considered by the Parish Council through the Neighbourhood Plan site allocation process. The adopted Local Plan identifies that site allocations should be made through the neighbourhood planning process, and this is being actively undertaken by the Parish Council.
- 2.25 The Council's Guidance Note issued for the consultation exercise sets out that in order to be justified, the DPD "should show how the policies and proposals help to ensure that the social, environmental and economic impacts are balanced and sustainability objectives will be achieved" (paragraph 4.2). Paragraph 7 of the NPPF identifies three dimensions of sustainable development social, environmental and economic impacts, and paragraph 8 sets out that *"to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system. The planning system*



*should play an active role in guiding development to sustainable solutions”.*

2.26 The accompanying AECOM Report (August 2016) assessed the proposed allocation of Land to the North of Little Springfield Farm. The second bullet point on page 26 of the Report sets out that;

*“The approach to sustainable development in the English planning system as set out in the NPPF and reiterated in both Chichester’s adopted Local Plan and in the Little Springfield Farm appeal decision means that Plaistow is effectively the only settlement in the parish that could be considered suitable for new housing development.”*

2.27 Further evidence in support of this is set out as follows;

- Land to the North of Little Springfield farm is approximately 2.4km from the centre of Plaistow village, which has the most facilities and services: a school, shop, Church, hall, post office services, village green, children’s playground, other recreational facilities and a pub;
- Land to the North of Little Springfield Farm is outside the Settlement Boundary and separated from the Ifold settlement by a barrier consisting of a two-lane highway (Plaistow Road). The DPD site location is divorced from the Ifold settlement which is centred around the historic unadopted roads of The Drive, The Ride and Chalk Road (all public footpaths or bridleways);
- Facilities and services in Ifold are limited to a village hall and a Scout Girl Guide HQ (which rely on volunteers);



- There are no public open spaces or a children’s playground in Ifold;
- Plaistow Road is a 40 mph speed zone. There are no pavements or pedestrian crossings to permit safe pedestrian access to the limited Ifold facilities or the facilities in Plaistow. There is also no street lighting. West Sussex County Council (Highway Authority) have advised that the sight line requirement for access onto a 40 mph road would be 120 metres (as above 37 mph, Design Manual for Roads and Bridges (DMRB) parameters are applied). Because of the bend in the Plaistow Road (north-west bound) it may be difficult for this to be achieved if access is taken from the existing access road into the Little Springfield Farm brownfield site as shown on the District Council SHLAA plan (it appears to be approximately 82 metres before the road begins to bend);
- The Local Education Authority (West Sussex County Council) ‘Home to School and College Transport Policy’ applied walking distances are: 3.218688 kilometres (two miles) in relation to a child who is under the age of eight; and 4.828032 kilometres (three miles) in relation to a child who has attained the age of eight. However, in approximately 1997/1998 West Sussex County Council made arrangements for the provision of bus transport for Ifold school children to and from Plaistow and Kirdford Primary School. This is because the Plaistow Road route is regarded by the County Council as too hazardous for a child to walk. The County Council were going to withdraw the free service that had been provided for a number years or withdraw the service entirely as they were not required to provide a bus. The only grounds to have a free service retained was safety , which the Parish Council proved and the County Council agreed.

2.28 In relation to the three specific dimensions identified above and in paragraph 7 of the NPPF;



**economic role;**

- the site at Land to the North of Little Springfield Farm, Ifold does not contribute to building a strong local economy in the Parish as residents are likely to go to Loxwood for access to more services and amenities than offered in Plaistow village;
- the proposed site does not contribute to the provision of infrastructure to improve the sustainability of Ifold- the proposed SA DPD allocation is not a strategic amount of housing by which to make provision for the lack of sustainability in Ifold;

**environmental role;**

- because of its distance from local Parish amenities and services, the site at Land to the North of Little Springfield Farm, Ifold does not contribute to supporting a strong, vibrant and healthy community;
- due to the clear lack of accessibility to local services and facilities by walking, reliance on the car as a mode of transport will be high;

**social role;**

- the proposed SA DPD site is more isolated and lacks opportunities to connect to other settlements and facilities, particularly on foot. Following the closure of the Ifold local stores (July 2015), there are no facilities in the settlement boundary of Ifold apart from a village hall. Development at the proposed SA DPD site would not necessarily help to



support the local school, and would not be in a place where social interaction and opportunities to meet other members of the community were more readily available.

- 2.29 It is submitted that the proposed SA DPD site does not fulfil the three dimensions set out in the NPPF. Other sites identified by the Parish Council, for potential inclusion within the Neighbourhood Plan, score better than the proposed SA DPD site as although all are outside the settlement boundary, the Plaistow sites would help to support the local facilities such as the shop and other social infrastructure and would reduce the reliance on the private car as a mode of transport. In particular, although limited, post office services are provided every Wednesday afternoon in Plaistow village between 1.30pm and 4.30pm, in the Youth Club room, at the rear of Winterton Hall. At this time, it is possible to post parcels and letters and use other services offered, such as personal banking, moneygrams, postal orders, mobile top ups, bill payment and key charging.
- 2.30 In light of this, and the fact that the Parish Council, unlike the District Council, are considering reasonable alternatives, based on recent robust and credible evidence, it is submitted that the proposed housing allocation in policy PL1 should be withdrawn, because as it stands at the moment, the draft SA DPD is not justified by the evidence.

### **Effective**

- 2.31 In order to be effective, the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities.



- 2.32 Whilst the proposed allocation does not require “joint working on cross-boundary strategic priorities”, consideration of the proposed allocation does require joint working with the Parish Council. As is evidenced above, the Parish Council, through the Neighbourhood Plan Steering Group, have attempted to discuss the proposed allocation of the site in the draft SA DPD with the District Council, but have thus far met with a lack of co-operation on this matter. As the adopted Local Plan sets out, very clearly, the allocation of housing sites should be through the neighbourhood planning process. In this case, the neighbourhood planning process is proceeding on the basis of the most up-to-date, robust and credible evidence, whereas the emerging SA DPD is not.
- 2.33 Plaistow and Ifold Parish Council were not advised of the site allocation in the Draft DPD or of its publication even though a Neighbourhood Plan Area had been designated and activities were underway under the direction of a Steering Group. When the CDC Neighbourhood Planning Officer was contacted prior to October 2015 she stated she was unaware the Parish were undertaking any Neighbourhood Plan activities. At that point several sites in Plaistow had been identified by the Parish Steering Group and CDC were unaware of some of the sites and had not thoroughly considered all the possible configurations as assessed by the Steering Group. All reasonable alternatives have not been considered.
- 2.34 In order to be deliverable, there must be a willingness on the part of the owner of the site to release it for development within the plan period. Whilst it is understood that the land owners are prepared to release the site if it is included in the adopted Plan as the allocated site for the Parish, the Parish Council also understands that the access road is owned by the Springfield Farm land owner (the appeal site to the south of the proposed site allocation), and the first part of the access is a shared access with Tawlbrook, the property to the front of the site. It is not clear that the existing access would be available or has the consent of all



those with an interest in the access for its release. If an alternative access is required, there may be highway implications as highlighted in paragraph 2.26 above.

2.35 Given the evidence set out above, it is submitted that the draft SA DPD is not effective.

#### **Consistent with national policy**

2.36 Consistency with national policy is a test of soundness. Paragraph 7 of the NPPF identifies three dimensions of sustainable development- social, environmental and economic impacts, and paragraph 8 sets out that *“to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system. The planning system should play an active role in guiding development to sustainable solutions”*.

2.37 It is demonstrated above that the proposed allocation of the site in policy PL1 does not properly consider the three dimensions resulting in the SA DPD being not justified. For the same reasons, the proposed site allocation is not consistent with national policy as set out in paragraphs 7 and 8 of the NPPF.





### 3.0 LEGALLY COMPLIANT

- 3.1 The Councils “Guidance Notes for Representation Form” document sets out that the considerations in relation to whether the draft Plan is legally compliant include;
- The Site Allocation should have regard to national planning policy;
  - The Council is expected to have followed the ‘Duty to Co-operate’ requirements.
- 3.2 As set out elsewhere in the representations, it is submitted that the draft Plan does not have regard to national policy, particularly paragraphs 7 and 8 of the NPPF, insofar as they relate to the proposed allocation of the site set out in Policy PL1. On this basis, the draft Plan is not legally compliant.
- 3.3 Furthermore, it is also set out elsewhere in these representations that the Parish Council do not consider that the District Council have co-operated effectively or properly. The failure to consider reasonable alternative sites, despite requests by the Parish Council, and in the light of robust, credible and up to date evidence, means that the planning authority have failed to “*to engage constructively, actively and on an*



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*ongoing basis*”, as required by section 110 of the Localism Act, in the preparation of the development plan document.

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#### 4.0 CHANGES REQUIRED

4.1 The representations set out above clearly demonstrate that the allocation of the site Land to the North of Little Springfield Farm in policy PL1 makes the draft SA DPD fail the tests of soundness. The draft Plan;

- Is not legally compliant as there has been a failure in the duty to co-operate;
- Is not legally compliant as there has not been sufficient regard to national policy, particularly paragraphs 7 and 8 of the NPPF;
- Is not positively prepared as it is not based on the adopted strategy set out in the adopted Local Plan;
- Is not justified as it is not based on recent, robust and credible evidence base, including the recent appeal decision for the Little Springfield Farm brownfield site;
- Is not justified as it is not the most appropriate strategy when considered against reasonable alternatives;
- Is not justified as policy PL1 does not help to ensure that the social, environmental and economic impacts are balanced and sustainability objectives will be achieved;



- Is not effective as there has been a lack of working with other public bodies (namely the Parish Council) who have identified more sustainable, alternative sites;
- Is not consistent with national policies, particularly in the form of paragraphs 7 and 8 of the NPPF.

4.2 Furthermore, the draft SA DPD is not positively prepared as the adopted Local Plan strategy is for *“the identification of sites and phasing of delivery will be determined primarily by local communities through a neighbourhood planning process”*. This process is currently underway in Plaistow and Ifold Parish, and should be allowed to continue. It is clear that the Neighbourhood Plan Steering Group have engaged with the local community and explored a number of alternative potential sites. At the time of drafting these representations, work is being carried out to finalise the preferred site.

4.3 As a result, it is submitted that policy PL1 should be deleted and a site for “about 10 units” should be identified and allocated by the Parish Council through the neighbourhood planning process.