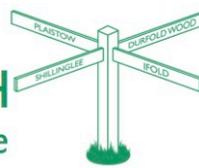


Date: 02 August 2016

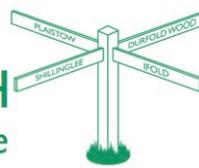
REFERENCE: PHONE CONFERENCE REGARDING SITE OPTIONS AND ASSESSMENT

PARTICIPANTS: Parish Council – Chairman, Sara Burrell (SRB) and Steering Group Coordinator – Christine Gibson-Pierce (CGP) with Jesse Honey (JH) – Lead Consultant, AECOM.

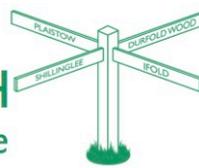
- 1.1 JH informed he had had a conversation with Sue Payne (CDC Planning Officer) to establish the District Council's load rationale for allocating a site in Ifold, which in his professional view would be against National Planning Policy. What he understood from the officer was that the site: Land to the North of Little Springfield Farm Ifold, was allocated in CDC's Site Allocations DPD (SA DPD) before the Planning Appeal decision (01 Mar 2016) on the brownfield site (Little Springfield Farm itself) and that the officer confirmed the Inspectorate's decision hadn't been reviewed by CDC in light of that determination. Sue Payne didn't say the site Land to the North of Little Springfield Farm was going to be taken out of the CDC SA DPD. But as a professional planning consultant, JH's view is that as a result of the brownfield site (Little Springfield Farm) planning appeal decision the site Land to the North of Little Springfield would not stand up as an allocation; and that whether the District Council take it out themselves or the Planning Inspector at examination of the SA DPD makes that decision, JH is confident it wouldn't go ahead as an allocation, because it fails on sustainability.
- 1.2 As stated in the Site Options and Assessment report, JH called attention to the key reasons why Land to the North of Little Springfield Farm wouldn't be allocated and that they apply also to the brownfield site. This is due to the sustainability of Ifold as a settlement and that is the overarching consideration. He understood the steering group's point that as a brownfield site in some respects it is more sustainable. But he raised comments noted in the Inspector's decision on the brownfield that the sustainability offered is significantly outweighed by the lack of sustainability which inhibits building any houses in Ifold. JH said that if a developer submitted a planning application now, with what Ifold currently has in terms of facilities and services, the application wouldn't get through the current planning system. That is the issue and JH could not see any way around that.
- 1.3 CGP drew his attention to the fact that CDC have permitted over 60 houses in Ifold in the past decade as windfall. JH did not think it had been sustainable planning to develop in the Ifold location, windfall or not. He was surprised the District had managed to get that planning through.
- 1.4 JH reminded that there are two separate planning processes, the CDC SA DPD process and he did not think any site in Ifold would survive that process; and likewise the independent examination of the Parish's Neighbourhood Plan. He did not think an Inspector would support an Ifold site in The Plan. The Inspector's conclusion on the brownfield is recent and as a result it carries significant weight. It offers a very up-to-date and clear picture of what the Planning Inspectorate would make of development in Ifold. There was a very clear conclusion that the brownfield wasn't a sustainable site for houses. JH is certain the conclusions in the Site Options & Assessment stand and that in Plaistow & Ifold Parish, he can't see any alternative but to allocate all sites in Plaistow.
- 1.5 CGP raised para 21 in the Inspector's brownfield decision '*The emerging allocations plan also appears to recognise the constraints of the village in being able to provide for the additional housing requirement and is identifying a site outside the settlement boundary. However, this is properly a decision for the plan making process...*'. JH agreed that paragraph was very important as it highlights there's no way the allocation of Land to the North of Little Springfield Farm would stand up in the light of that brownfield decision.
- 1.6 CGP queried whether the DPD allocated site had undergone examination with the Local Plan. Land to the North of Little Springfield site had not been allocated in the Local Plan, just the number of units specified. The site was allocated in the SA DPD after the Local Plan was adopted in 2015.
- 1.7 SRB didn't understand the logic of the Site Options & Assessment outcome because the brownfield as 17000 sqft of redundant industrial buildings and therefore putting in smaller square footage of residential units is not going to cause significant impact on the countryside. She read the Inspector's decision more on the basis that 3 very large, two-storey units were considerably impactful and thought that if a better designed, smaller, compact, scheme was proposed, single or one and a half-storey, with an agricultural vernacular, it would be a reasonable alternative and not so impactful.



- 1.8 SRB mentioned setting aside the issue of sustainability, the fact is that it's accepted that everyone in the Ifold area has to drive to access facilities and employment. Even if housing were allocated in Plaistow, the village only has one small shop, one primary school and no major levels of employment. Therefore everybody has to drive in order to live in the Parish and there is no bus service that's of any use to anybody. It could be said that all of the Parish settlements are unsustainable. She thought that is why CDC only allocated 10 units in order that the Parish could meet our housing need and make some contribution to housing for the District.
- 1.9 JH agreed on an individual site level the visual impact of the brownfield site would be massively improved by conversion to residential but that it doesn't overturn the wider assessment the Parish has to make with consideration of National Planning Policy Framework as the Inspector has done in the Appeal decision, that Ifold is simply not a sustainable location.
- 1.10 CGP pointed out that if Ifold was a not a sustainable location, then the past decade of housing development should never have been permitted by CDC. SRB added that two other development sites within the Settlement Boundary were permitted on appeal by the Planning Inspectorate and that was contrary planning opinion. JH reminded that the new development that has taken place in Ifold in recent years was in the context of Ifold having a functioning shop, which is now closed and this was referenced in the Inspector's brownfield Appeal decision and that was a significant point. JH fully accepted parishioners have to drive being located in the countryside but it wasn't about totally avoiding driving but seeking to minimize it. Therefore housing in a village that has a shop, primary school and pub will significantly minimise the need to drive and that's why Plaistow is more sustainable when assessed against National Planning Policy Framework, which the Inspector will do with both the CDC Site Allocations DPD examination process and again during the Neighbourhood Plan examination process.
- 1.11 JH accepted that in certain situations it's possible there would be no suitable land in the village that has the facilities, which would therefore force consideration of a site in Ifold. However in this case there are a number of sites deemed to be suitable in Plaistow and it would be extremely difficult to argue why those sites aren't more suitable over any found in Ifold. JH cautioned that with the sites being assessed, such as The Dairy, that the Parish did not pre-judge an outcome before a full assessment of the sites had been made.
- 1.12 SRB said that the Parish needed to make a statement in The Plan as to what is going to happen to the brownfield. JH disagreed. SRB explained the existing B2/B8 use class is next to residential properties across the two-lane highway. The Parish was experiencing a serious issue with high volume traffic movements from the inappropriate expansion at Crouchland Farm and had that as reference of inappropriate industrial activity next to residential. JH suggested establishing an alternative use more sustainable in a rural area such as nature reserve or open space. SRB informed him that decommissioning the brownfield would be very expensive as the landowner had done some preliminary estimates.
- 1.13 CGP raised the issue of sustainability versus identified housing need, an aging population wishing to downsize. JH said the housing need, the demand side of the assessment, must be separated from where that housing goes, the supply side. The government to look at them separately.
- 1.14 SRB explained another issue being a developer could pay a commuted sum to the District to avoid having to deliver the affordable element. That as market housing will be at full market value it would not meet any of the Parish identified housing need because the Parish is a high value area. She asked if the Parish could build into consideration the amenability of the landowner, because some sites are owned by local people who have a commitment to the Parish. They would be more altruistic in the provision of affordable housing. Was the Parish allowed to factor that into consideration? JH agreed it would be possible. It was felt Community Land Trust would be a huge undertaking for the Parish, having to become landowners and administer it. JH thought that as the Parish has a number of sites with willing landowners, it wouldn't have to go to extent of CLT.
- 1.15 JH advised that if The Dairy site wasn't suitable the Parish could then look at the site: Land opposite The Green. He recommended a further public consultation on the range of sites to demonstrate an equitable balance, as mentioned in the report, between the technical considerations (the scope of the AECOM work) and the opinions of the local community, which both have to be taken into consideration.



- 1.16 SRB pointed out there were many letters of community support for the brownfield when the planning application was lodged with the District and the Parish has a 2012 survey outcome where a specific question was asked of the community should brownfield be developed before greenfield and the response was overwhelmingly brownfield should always be developed first. Even if the brownfield site was not allocated for the 10 units the Parish would still have to make some decisions within The Plan as to its future. JH pointed out it is always the case, when people involved and the community, are not planners, that there will be suggestions that don't stack up against how the planning system works. That's why it's a careful balancing act for the Parish. He recognised the support for the brownfield site, but advised the Inspector weighed various competing arguments and came to the conclusion unsurprisingly that the NPPF held the most weight. The Parish has to accept that conclusion.
- 1.17 SRB explained that it still left the issue of the brownfield site hanging and the threat of industrial B2/B8 use next to residential properties. JH reminded that the Parish was between two issues. SRB / CGP accepted that a public consultation on Plaistow sites, should be done.
- 1.18 JH suggested the Parish could allocate the brownfield for non-industrial use such as open space and then have an appropriate Plan policy. CGP said the landowner would not accept that use, that it would end up decaying industrial buildings because of the prohibitive cost to decommission the site. JH advised the Parish could look to allocate the brownfield for such an alternative use and the landowner could make a case at the Neighbourhood Plan examination. If the Parish presented appropriate evidence it could possibly carry the day as long as the alternative use isn't housing.
- 1.19 SRB thought the central government stance on brownfield did not carry weight. CGP asked if sustainability trumps brownfield. JH reminded that the NPPF had to be looked at in its entirety as the Inspector has done regarding the brownfield decision. That the Inspector correctly concluded that the brownfield is overridden by the fact that anybody who lives in a house on that site would not be connected to the Ifold settlement but would also have to drive to facilities and services.
- 1.20 SRB noted a letter on the CDC website where the landowner stated an intention to reopen the Ifold shop and that the brownfield site is in easy walking distance. JH said that once the shop reopens and not on a promise of reopening, and if The Plan has not been submitted then the Parish may have a greater chance of the brownfield site going forward because [the shop closure] was a consideration of the Inspector in refusing the site. However, JH drew attention to the importance of para 35 of the brownfield Appeal decision and the overall conclusions of the Inspector: *"I have concluded that the proposed development would not result in a material loss of industrial land harmful to the local economy and that it would provide an appropriate mix of dwelling sizes. I have, however, also concluded that the proposal would be unsustainably located, outside the settlement boundary..."* JH said that section of para 35 indicates the Inspector doesn't agree the brownfield site would be connected to Ifold in physical terms. The Inspector describes it as being in the open countryside and it *"would harm the character and appearance of the surrounding area."* JH thought that last point was debatable.
- 1.21 JH emphasised para 36 of the Appeal decision. CDC are in a strong position in assessing applications due to a 5-year housing land supply. The Inspector's Appeal decision provided many reasons for the brownfield not to be feasible that JH cautioned the Parish on progressing it. SRB pointed out Planning Inspector refers to 'the scheme' in the brownfield decision and if it had been a better designed, scheme she wondered if the Inspector's view might have been different. JH thought not, because in paragraphs 35-36 of the Appeal decision, a summary of all the key issues, 'design' was not a factor.
- 1.22 CGP asked how the brownfield decision compared against Ash Park, Plaistow, the site of an old brickworks. The District had permitted a 20000 sqft home built in 2011. The site is located outside the centre of Plaistow and not within easy walking distance. The landowner had tried different uses over many years that all failed. CDC refused a planning application for smaller units, they wouldn't consider live/work units there but eventually granted consent for a huge residence with swimming pool, tennis court and 3 bay garage. This was contradictory planning decision. The Parish could consider B1 use on the brownfield (light industrial) but with the Ash Park experience it would likely be not economically viable. SRB was concerned what the Parish could realistically do at the brownfield and how to weigh up contradictory Planning Inspectorate decisions.



- 1.23 SRB pointed out that when the Inspector examines The Plan, the Site Options and Assessment will be reviewed and given weight. JH advised that the Planning Inspectorate will look at the other Inspector's brownfield decision too, which will carry significant weight. That it is not a case of everything hanging off the brownfield Appeal decision it is simply that it is so recent and relevant to what the Parish is looking at that it is going to significant weight in the upcoming examination and that is his professional opinion of how the Planning Inspectorate works and the result of that particular decision makes him 99% certain on the outcome of the examination.
- 1.24 JH also noted the Ash Park planning application was in 2011, before the NPPF (2012), before the current CDC Local Plan was adopted in 2015 and that there may have been site-specific issues that tilted the balance towards no other uses. He suggested the Parish could apply to Locality for a Viability Assessment package in light of the AECOM recommendations.
- 1.25 SRB pointed out that as the Parish doesn't have local employment having the viability package assistance with the idea of changing the use class on the brownfield to Light industrial / live-work could create local employment, removing the need to commute to work, which would perhaps help the Parish to qualify for such a package. It was queried if a viability assessment would factor in the cost of decommissioning the site. JH advised that a viability assessment would look at the whole range of uses and with reference to the decommissioning of the site.
- 1.26 SRB summarized the discussion. JH emphasised he stands by the Site Options and Assessment report and will formalise it. The Parish Council does not have to agree with the decision but the report will be formally signed off by DCLG and if the Parish goes in a different direction it would have to justify the decision and show the evidence behind such as decision to the Inspector at examination of The Plan.
- 1.27 CGP said she would log the Site Options and Assessment report in the Neighbourhood Plan evidence base and that the Steering Group would have to manage local opinion because it was likely some landowners and Plaistow parishioners will not be happy with the outcome.
- 1.28 JH acknowledged the The Plan hadn't been simplified by CDC's actions in allocating an Ifold site in their SA DPD. It gave false hope, unhelpful to the Steering Group, of the possibility of a site in Ifold when the District would have to withdraw the DPD site at some point due to the evidence against its allocation.
- 1.29 SRB pointed out CDC never seriously considered any sites identified by the Steering Group in Plaistow other than a site known as Todhurst. Sue Payne (CDC Officer) only accompanied the steering group on a walkabout looking for sites in Ifold. She did not accompany the steering group to look for any sites in Plaistow. Then the Parish learned CDC had allocated Land to the North of Little Springfield. She informed JH that CDC have never engaged with the Parish on the Neighbourhood Plan which they knew the Parish were undertaking. SRB pointed out the Parish Council's letter to CDC criticising their process because they had not consulted with the Parish or given proper notice of what they were doing. The Parish Council appreciates CDC have a land allocation they have to make but that have not worked with them. When the Parish pointed out the other sites identified that were in Plaistow, CDC were non-plussed. SRB accepted the LPA has limited resources however CDC should work better with communities who are on the ground doing their legwork.
- 1.30 JH said the Site Options and Assessment even if reluctantly accepted, gives the Parish a powerful case to argue against the CDC site allocation of Land to the North of Little Springfield Farm.
- 1.31 CGP asked JH to be clear in the evidence guiding his recommendations when finalizing the report because other landowners had been a little unhappy that their sites haven't gone forward. JH understood the point and would make appropriate amendments.