

PLYMOUTH CITY COUNCIL

REPORT OF ACTION TAKEN UNDER DELEGATED CABINET MEMBER DECISIONS

Delegated Authority Reference No. (Democratic Support to complete)

Name of the Matter

Proposed Representations to the Alternative Sites Consultation on South Hams District Council, Local Development Framework, Sherford New Community Area Action Plan Post (Submission Stage)

Cabinet Member Exercising Delegated Authority

Cllr Mrs Nelder, Portfolio Holder for Strategic Planning Policy

Decision

To make the attached formal representations on the Alternative Sites Consultation to the Sherford New Community Area Action Plan (Submission Stage).

Reasons for Decision

To ensure that Plymouth's views are taken into consideration and that the interests of the city are considered in the proper planning of Sherford.

Alternative Options Considered and Rejected (if not applicable, please provide explanation)

Not to make representations at this stage would exclude the City Council from representing its case to an independent examination on the alternative site suggested for the Sherford New Community.

Financial Implications

None arising from this report

In Consultation with:

- ... Other Cabinet Member (if applicable) ..... N/A
- ... Corporate Management Team Member ..... NJP.

and

- |                                 |                             |
|---------------------------------|-----------------------------|
|                                 | (Officer's initials or N/A) |
| • Head of Finance (mandatory)   | EM DevF670035               |
| • Head of Legal Services        | JAR                         |
| • Head of Human Resources       | N/A.....                    |
| • Head of Asset Management      | N/A.....                    |
| • Head of IT                    | N/A.....                    |
| • Head of Strategic Procurement | N/A.....                    |

## Was the Decision

- |   |     |
|---|-----|
| • A key decision?* Y/N  | No  |
| • In the Forward Plan?* Y/N   | No  |
| • Within the policy and budget framework?* Y/N  | Yes |
| • In accordance with Equalities Assessment? Y/N   | N/A |
| • A case of special urgency agreed by the Chair of Overview and Scrutiny Commission*? Y/N - | Yes |

If Yes

Signed by Chair of Overview and Scrutiny Commission

.....

Reason for Urgency (please indicate how delay for call-in would seriously prejudice the Council's or the public interest)

South Hams District Council published the Sherford Area Action Plan (submission stage) Alternative Sites Consultation 29<sup>th</sup> August 2006 - for a statutory 6 week consultation period ending on 10<sup>th</sup> October 2006. This is an open consultation for any organisation / individual to respond to.

The alternative site proposal subject to consultation is of great significance to the City Council's interests and therefore it was extremely important that we made a formal response. The technical analysis of these documents (and appropriate background material / historical information) is a lengthy process in itself, and needed to be done carefully and in consultation with other key departments.

The time constraints were such that an earlier Delegation meeting was not realistically achievable.

\* See Forward Plan for explanation on all these issues.

# For further advice, contact Acting Head of Safer Communities, ext. 4321/4004

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**List of Background Papers** (If not attached, indicate where it can be accessed. Any confidential information should be included in background papers only and not contained in the delegated decision. If background paper Part II, please indicate and complete Reasons for Part II below.)

- South Hams District Council, Local Development Framework Core Strategy

- South Hams District Council, Sherford Area Action Plan and accompanying Sustainability Appraisal
- South Hams District Council Sherford Area Action Plan (Submission Stage) – Further Consultation – Alternative Sites Consultation.

The above documents can be viewed at the Civic Centre, or on the South Hams Council web site ([www.southhams.gov.uk](http://www.southhams.gov.uk))  
(The above Part II background papers are not for publication by virtue of Paragraph(s) Part 1 of Schedule 12A of the Local Government Act 1972.)

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**Cabinet Member –**

I agree the decision and confirm that it is not contrary to the Council's policy and budget framework, City Strategy and Corporate Plan (Medium Term Financial Plan).

Sign ..... Date .....

## **Sherford Area Action Plan (Submission)**

### **Response of Plymouth City Council to Alternative Sites Consultation (*Sherford Refined*)**

#### **1. Introduction**

- 1.1 South Hams District Council received one representation to the submitted Sherford Area Action Plan that proposed an alternative site for the Sherford New Community. Under the new Local Development Framework system, South Hams District Council are obliged to advertise this alternative site to allow others to make representations on it, so that the Planning Inspector can consider all the relevant views. This is a statutory period which ends at 4.00 p.m. on 10<sup>th</sup> October 2006. The alternative site has been suggested by the Plymouth & South West Co-operative Society Ltd and it is variously referred to as either the alternative site or *Sherford Refined* (the P&SW Co-op term for it).
- 1.2 The alternative site is close to the submitted Sherford AAP site, but it is located farther to the south and east and does not include any land within the City Council authority area. The transport proposals are also significantly different as they connect the Deep Lane junction with the A379 between Plymouth and Brixton with a new road, which provides for 2 park and ride sites. The proposed transport infrastructure would provide a less direct and longer public transport route into the City via the A379, particularly from the Deep Lane Junction. The proposed urban form and impact of the proposal are significantly different and considered to be far less sustainable than the submitted Sherford proposal. The alternative proposal is significantly more separated from Plymouth and extends into the Countryside, creating a new community more isolated from Plymouth, whose housing needs it is primarily intended to meet. A copy of the alternative *Sherford Refined* location plan as suggested is attached.
- 1.3 Whilst the alternative *Sherford Refined* proposal has been subject to a statutory consultation period, it is considered that the method of its proposal is considerably weaker and hence flawed in comparison to the submitted Sherford proposal which has been subject to lengthy and considerable public consultation and debate, including in depth stakeholder consultation, which the alternative *Sherford Refined* proposal has not.
- 1.4 The alternative *Sherford Refined* proposal representation document sets out a criticism of the submitted Sherford proposal and presented a case of how the alternative *Sherford Refined* proposal addressed these criticisms and provided for a more sustainable development option. However, there was very little evidence submitted with the alternative *Sherford Refined* proposal that might provide an objective and robust defence of the alternative proposal. There was a significant reliance on a document produced for the Devon Structure Plan Inquiry in to support the strategic allocation of Sherford in comparison to other strategic options. It is of great concern that that the alternative *Sherford Refined* is not underpinned by an appropriate evidence base to provide a robust basis for its allocation.

## **2. Response**

Compliance of Alternative Site Proposal with tests of Soundness in relation to existing policy framework:

### **Test 3 Sustainability appraisal - FAIL**

The alternative site proposal (*Sherford Refined*) fails to meet this test, as the proposal has not been subject to a sustainability appraisal.

### **Test 4a Consistency with Other policies – FAIL**

The *Sherford Refined* proposal fails to demonstrate that it complies with and is consistent with the requirements of:

**1. Devon Structure Plan to 2016 Adopted October 2004**

The proposal fails to demonstrate how it is capable of accommodating in a sustainable and acceptable way development beyond the plan period. This issue is currently addressed in a robust and sound way in the Sherford and North Plymstock AAP's.

**2. South Hams District Council LDF Core Strategy Submitted June 2006**

The alternative proposal does not fully comply with the requirements of the Core Strategy. In particular the proposal does not demonstrate that it provides a coherent planned eastern boundary to the PUA and there are no clear proposals for the sustainable growth of the new community to meet future housing needs.

**3. South Hams District Council LDF South Sherford Area Action Plan Submitted June 2006**

The proposal is in prima facie conflict with the submitted Sherford AAP, which has been the outcome of sound preparation and is substantively based on a robust and credible evidence base and has been subject to rigour of proper procedure and consultation.

**4. Plymouth City Council Local Transport Plan 2006-2011.**

The alternative proposal does not provide evidence to demonstrate that it is consistent with the Local Transport Plan.

**5. Plymouth City Council LDF Core Strategy Submitted August 2006.**

The alternative proposal fails to demonstrate that it is consistent with the Core Strategy proposed for Plymouth, in particular it does not promote the development of a sustainable linked community as set out in Area Vision 8 for North Plymstock & Minerals.

**6. Plymouth City Council LDF North Plymstock Area Action Plan Submitted August 2006.**

The alternative proposal fails to demonstrate that it is consistent with the North Plymstock Area Action Plan. The proposal is not consistent with policies/proposals NP05, NP06, NP07, NP08, NP09, NP11, NP13, NP15, and NP16.

### **Test 4b Consistency with National Policy – FAIL**

The *Sherford Refined* proposal fails in relation to national planning policy, in particular:

1. PPS 3 – Housing

The alternative proposal fails the sequential test in comparison to the submitted proposal, which delivers a more sustainable development option. *Sherford Refined* forms a freestanding new settlement to the east of Plymouth's urban edge, whereas *Sherford* as submitted provides an urban extension with the PUA. The proposal as submitted would in effect be a new neighbourhood of the city, providing a coherent and defensible edge to the PUA, with future growth taking place back into the city and a significant level of sharing of infrastructure.

2. **PPS 12 – Local Development Frameworks**

The alternative proposal fails to indicate how it complies with the tests of soundness and how the sustainability appraisal process has been or is to be carried out prior to consideration at examination.

The alternative proposal does not provide sufficient specific changes to provide a basis for a robust Area Action Plan allocation.

**Test 4c Consistency with Regional Policy – FAIL**

The *Sherford Refined* proposal fails to demonstrate how it provides for an urban extension at Plymouth. *Sherford Refined* is more remote from the urban area than the submitted proposal.

The *Sherford Refined* proposal fails to demonstrate how it will provide for the longer term development needs of the area as set out in the draft RSS to the period 2026.

**Test 5 Regard to the Community Strategy - FAIL**

The alternative site proposal (*Sherford Refined*) fails to meet this test, as the proposal does not have proper regard to significant elements of the community strategies for both Plymouth and South Hams.

**Test 6 Coherent proposals between documents and other authority plans - FAIL**

The alternative proposal is inconsistent with the draft Regional Spatial Strategy, the City Council's submitted Core Strategy and North Plymstock Area Action Plan and with the South Hams Core Strategy and the *Sherford* Area Action Plan.

The alternative proposal does not present a coherent proposal with sufficient information and guidance to enable the proper delivery of a sustainable new community.

**Test 7 Proposals are the most appropriate in circumstances and compared to alternatives - FAIL**

The alternative proposal fails to demonstrate that it is the most appropriate proposal in relation to a robust and credible evidence base and the proposal set out in the submitted AAP. The alternative proposal does not appear to be supported by an evidence base of sufficient substance and credibility to support this significant development. The alternative proposal fails to demonstrate that it can provide for a high quality development in particular relation to transport and environmental impact.

The alternative proposal fails to demonstrate that it provides for more sustainable transport proposals, particularly in relation to its context, urban form and connections with the existing transport infrastructure, the plans of neighbouring authorities and the consequent ability to deliver sustainable public transport solutions

The alternative proposal (*Sherford Refined*) would lead to a far greater intrusion into the countryside, threatening coalescence with Brixton.

**Test 8 There are clear mechanisms for implementation - FAIL**

The alternative proposal fails to provide clear proposals for implementation and monitoring of the proposal.

There is no apparent evidence to support the means of implementation of the proposal, particularly in relation to assembly of land required to implement the proposal or means for implementation if land assembly proved to be difficult.

**Test 9 The plan is reasonably flexible - FAIL**

The alternative proposal fails to demonstrate how it can accommodate sustainable future growth.

# South Hams Local Development Framework

## Sherford Area Action Plan (Submission Stage) – Alternative Sites Consultation Response Form



South Hams  
District Council

Please read the Guidance Notes before completing this form in black ink.

**A separate form should be used for each matter and should relate to a Test of Soundness for your representation to be properly considered.**

All comments should be received by **4.00pm on Tuesday  
10 October 2006** to guarantee that they will be considered.

For Official Use Only

Reference No. ....

Date Acknowledged .....

**Please complete this form if you are responding to the Alternative Sites Consultation ONLY**

### 1. Personal Details

### 2. Agents Details (if applicable)

Title

Mr

First Name

Andrew

Last Name

Roberts

Job Title (where relevant)

Spatial Planning Co-ordinator

Organisation (where relevant)

Address Line 1

Planning & Regeneration Service

Line 2

Civic Centre

Line 3

Plymouth

Line 4

Post Code

PL1 2AA

Telephone Number

01752 304361

E-mail

Andy.Roberts@plymouth.gov.uk

### Data Protection

The comment(s) you submit on the Local Development Framework (LDF) will be used in the plan process and may be in use for the lifetime of the LDF in accordance with the Data Protection Act 1998. The information will be analysed and issues raised will be considered by the Council. Please note that comments cannot be treated as confidential and will be made available for public inspection at the Council offices, and available to view on the Council's website ([www.southhams.gov.uk](http://www.southhams.gov.uk)).

### 3. History of Representation

Did you make a representation with the Council earlier in the process of the preparation of the Sherford Area Action Plan ?

No	Yes (Issues & Options Stage)	Yes (Preferred Options)	Yes (Submission Stage)
<input type="checkbox"/>	<input type="checkbox" value="Yes"/>	<input type="checkbox" value="Yes"/>	<input type="checkbox" value="Yes"/>

If you answered 'No' to the above, can you briefly explain why you did not do so:

### 4(a). Nature of Representation

Do you consider the Alternative Site to be:

**Sound<sup>1</sup>**

Go to Q.5

i.e. that you support the alternative site

**Unsound**

Go to Q.4(b)

i.e. you do not support the alternative site to the one proposed in the Sherford AAP

### 4(b). Nature of Representation

If you consider the Alternative Site is **unsound**, please tick which test of soundness your representation relates to. For more information on any of the 9 Tests of Soundness please see the Guidance Note.

**Please note you should complete a separate form for each test you consider the Alternative Site fails.**

(See attached)

Please tick one

Test only

#### Failure to meet a Soundness Test

1. It has not been prepared in accordance with the authority's Local Development Scheme (LDS).
2. (A) It has not been prepared in compliance with the Statement of Community Involvement (SCI).   
  
(B) Where no SCI exists, it has not been prepared in accordance with the minimum requirements of the Town and Country Planning (Local Development) (England) Regulations 2004.
3. The plan and its policies have not been subject to sustainability appraisal.
4. (A) It is not a spatial plan, or it has not properly had regard to any other relevant plans, policies and strategies relating to the area or to adjoining areas.

<sup>1</sup> The Planning Inspectorate defines 'sound' within its ordinary meaning of 'showing good judgement' and 'able to be trusted' and within the context of fulfilling the expectations of legislation.

(B) It is inconsistent with national planning policy.

(C) It is not in general conformity with the regional spatial strategy.

5. It does not have regard to the authority's community strategy.

6. The strategies/policies/allocations in the plan are not coherent and consistent within and between Development Plan Documents (DPDs) prepared by the authority and by neighbouring authorities, where cross boundary issues are relevant.

7. The strategies/policies/allocations fail to represent the most appropriate in all the circumstances, having considered the relevant alternatives, and they are not founded on a robust and credible evidence base.

8. There are no clear mechanisms for implementation and monitoring.

9. The plan is not reasonably flexible to enable it to deal with changing circumstances.

*For more information on any of the 9 Tests of Soundness please see the Guidance Note*

#### **5. Explanation of Representation**

Please give details of why you consider the Alternative Site to be either 'sound' or 'unsound'. If you consider it to be 'unsound' please have regard to the test you have identified in response to question 4(b). Please be as precise as possible.

See attached

***Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation. After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.***

**6(a). Examination**

Can your representation seeking a change be considered by written representations or do you consider it necessary to attend in person at the Examination?

Written Representations     Attend Examination

**6(b). Examination**

If you wish to attend in person at the examination, please outline why you consider this to be necessary:

To present case of Plymouth City Council and maintain co-ordination of cross boundary plans.

*Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to attend the Examination.*

**Signature**

**Date**

10<sup>th</sup> October 2006

**Please return your completed Alternative Site Response Form to:**

**Post:** Major Developments Team, South Hams District Council, Follaton House, Plymouth Road, Totnes, TQ9 5NE

**Fax:** Marked - Major Developments (01803) 861404

**Email:** major.developments@southhams.gov.uk

For any enquiries please call **01803 861234**

**PLYMOUTH CITY COUNCIL**

**REPORT OF ACTION TAKEN UNDER DELEGATED CABINET MEMBER DECISIONS**

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**Delegated Authority Reference No.** (Democratic Support to complete)

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**Name of the Matter**

Proposed Representations to the Alternative Sites Consultation on South Hams District Council, Local Development Framework, Sherford New Community Area Action Plan Post (Submission Stage)

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**Cabinet Member Exercising Delegated Authority**

Cllr Mrs Nelder, Portfolio Holder for Strategic Planning Policy

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**Decision**

To make the attached formal representations on the Alternative Sites Consultation to the Sherford New Community Area Action Plan (Submission Stage).

**Reasons for Decision**

To ensure that Plymouth's views are taken into consideration and that the interests of the city are considered in the proper planning of Sherford.

**Alternative Options Considered and Rejected (if not applicable, please provide explanation)**

Not to make representations at this stage would exclude the City Council from representing its case to an independent examination on the alternative site suggested for the Sherford New Community.

**Financial Implications**

None arising from this report

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**In Consultation with:**

- ... Other Cabinet Member (if applicable) ..... N/A
- ... Corporate Management Team Member ..... N/A.

and

- |                                 |                             |
|---------------------------------|-----------------------------|
|                                 | (Officer's initials or N/A) |
| • Head of Finance (mandatory)   | EM DevF670035               |
| • Head of Legal Services        | JAR                         |
| • Head of Human Resources       | N/A.....                    |
| • Head of Asset Management      | N/A.....                    |
| • Head of IT                    | N/A.....                    |
| • Head of Strategic Procurement | N/A.....                    |

## Was the Decision

- A key decision?\* Y/N No
- In the Forward Plan?\* Y/N No
- Within the policy and budget framework?\* Y/N No
- In accordance with Equalities Assessment? Y/N N/A
- A case of special urgency agreed by the Chair of Overview and Scrutiny Commission\*? Y/N - Yes

If Yes

Signed by Chair of Overview and Scrutiny Commission

.....  
Reason for Urgency (please indicate how delay for call-in would seriously prejudice the Council's or the public interest)

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**Cabinet Member –**

I agree the decision and confirm that it is not contrary to the Council's policy and budget framework, City Strategy and Corporate Plan (Medium Term Financial Plan).

Sign ..... Date .....

## Sherford Area Action Plan (Submission)

### Response of Plymouth City Council to Alternative Sites Consultation (*Sherford Refined*)

#### 1. Introduction

- 1.1 South Hams District Council received one representation to the submitted Sherford Area Action Plan that proposed an alternative site for the Sherford New Community. Under the new Local Development Framework system, South Hams District Council are obliged to advertise this alternative site to allow others to make representations on it, so that the Planning Inspector can consider all the relevant views. This is a statutory period which ends at 4.00 p.m. on 10<sup>th</sup> October 2006. The alternative site has been suggested by the Plymouth & South West Co-operative Society Ltd and it is variously referred to as either the alternative site or *Sherford Refined* (the P&SW Co-op term for it).
- 1.2 The alternative site is close to the submitted Sherford AAP site, but it is located farther to the south and east and does not include any land within the City Council authority area. The transport proposals are also significantly different as they connect the Deep Lane junction with the A379 between Plymouth and Brixton with a new road, which provides for 2 park and ride sites. The proposed transport infrastructure would provide a less direct and longer public transport route into the City via the A379, particularly from the Deep Lane Junction. The proposed urban form and impact of the proposal are significantly different and considered to be far less sustainable than the submitted Sherford proposal. The alternative proposal is significantly more separated from Plymouth and extends into the Countryside, creating a new community more isolated from Plymouth, whose housing needs it is primarily intended to meet. A copy of the alternative *Sherford Refined* location plan as suggested is attached.
- 1.3 Whilst the alternative *Sherford Refined* proposal has been subject to a statutory consultation period, it is considered that the method of its proposal is considerably weaker and hence flawed in comparison to the submitted Sherford proposal which has been subject to lengthy and considerable public consultation and debate, including in depth stakeholder consultation, which the alternative *Sherford Refined* proposal has not.
- 1.4 The alternative *Sherford Refined* proposal representation document sets out a criticism of the submitted Sherford proposal and presented a case of how the alternative *Sherford Refined* proposal addressed these criticisms and provided for a more sustainable development option. However, there was very little evidence submitted with the alternative *Sherford Refined* proposal that might provide an objective and robust defence of the alternative proposal. There was a significant reliance on a document produced for the Devon Structure Plan Inquiry in to support the strategic allocation of Sherford in comparison to other strategic options. It is of great concern that that the alternative *Sherford Refined* is not underpinned by an appropriate evidence base to provide a robust basis for its allocation.

## **2. Response**

Compliance of Alternative Site Proposal with tests of Soundness in relation to existing policy framework:

### **Test 3 Sustainability appraisal - FAIL**

The alternative site proposal (*Sherford Refined*) fails to meet this test, as the proposal has not been subject to a sustainability appraisal.

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The *Sherford Refined* proposal fails to demonstrate that it complies with and is consistent with the requirements of:

1. Devon Structure Plan to 2016 Adopted October 2004

The proposal fails to demonstrate how it is capable of accommodating in a sustainable and acceptable way development beyond the plan period. This issue is currently addressed in a robust and sound way in the Sherford and North Plymstock AAP's.

2. South Hams District Council LDF Core Strategy Submitted June 2006

The alternative proposal does not fully comply with the requirements of the Core Strategy. In particular the proposal does not demonstrate that it provides a coherent planned eastern boundary to the PUA and there are no clear proposals for the sustainable growth of the new community to meet future housing needs.

3. South Hams District Council LDF South Sherford Area Action Plan Submitted June 2006

The proposal is in prima facie conflict with the submitted Sherford AAP, which has been the outcome of sound preparation and is substantively based on a robust and credible evidence base and has been subject to rigour of proper procedure and consultation.

4. Plymouth City Council Local Transport Plan 2006-2011.

The alternative proposal does not provide evidence to demonstrate that it is consistent with the Local Transport Plan.

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### **Test 4b Consistency with National Policy – FAIL**

The *Sherford Refined* proposal fails in relation to national planning policy, in particular:

1. PPS 3 – Housing

The alternative proposal fails the sequential test in comparison to the submitted proposal, which delivers a more sustainable development option. *Sherford Refined* forms a freestanding new settlement to the east of Plymouth's urban edge, whereas Sherford as submitted provides an urban extension with the PUA. The proposal as submitted would in effect be a new neighbourhood of the city, providing a coherent and defensible edge to the PUA, with future growth taking place back into the city and a significant level of sharing of infrastructure.

2. PPS 12 – Local Development Frameworks

The alternative proposal fails to indicate how it complies with the tests of soundness and how the sustainability appraisal process has been or is to be carried out prior to consideration at examination.

The alternative proposal does not provide sufficient specific changes to provide a basis for a robust Area Action Plan allocation.

**Test 4c Consistency with Regional Policy – FAIL**

The *Sherford Refined* proposal fails to demonstrate how it provides for an urban extension at Plymouth. *Sherford Refined* is more remote from the urban area than the submitted proposal.

The *Sherford Refined* proposal fails to demonstrate how it will provide for the longer term development needs of the area as set out in the draft RSS to the period 2026.

**Test 5 Regard to the Community Strategy - FAIL**

The alternative site proposal (*Sherford Refined*) fails to meet this test, as the proposal does not have proper regard to significant elements of the community strategies for both Plymouth and South Hams.

**Test 6 Coherent proposals between documents and other authority plans - FAIL**

The alternative proposal is inconsistent with the draft Regional Spatial Strategy, the City Council's submitted Core Strategy and North Plymstock Area Action Plan and with the South Hams Core Strategy and the Sherford Area Action Plan.

The alternative proposal does not present a coherent proposal with sufficient information and guidance to enable the proper delivery of a sustainable new community.

**Test 7 Proposals are the most appropriate in circumstances and compared to alternatives - FAIL**

The alternative proposal fails to demonstrate that it is the most appropriate proposal in relation to a robust and credible evidence base and the proposal set out in the submitted AAP. The alternative proposal does not appear to be supported by an evidence base of sufficient substance and credibility to support this significant development. The alternative proposal fails to demonstrate that it can provide for a high quality development in particular relation to transport and environmental impact.

The alternative proposal fails to demonstrate that it provides for more sustainable transport proposals, particularly in relation to its context, urban form and connections with the existing transport infrastructure, the plans of neighbouring authorities and the consequent ability to deliver sustainable public transport solutions

The alternative proposal (*Sherford Refined*) would lead to a far greater intrusion into the countryside, threatening coalescence with Brixton.

**Test 8 There are clear mechanisms for implementation - FAIL**

The alternative proposal fails to provide clear proposals for implementation and monitoring of the proposal.

There is no apparent evidence to support the means of implementation of the proposal, particularly in relation to assembly of land required to implement the proposal or means for implementation if land assembly proved to be difficult.

**Test 9 The plan is reasonably flexible - FAIL**

The alternative proposal fails to demonstrate how it can accommodate sustainable future growth.