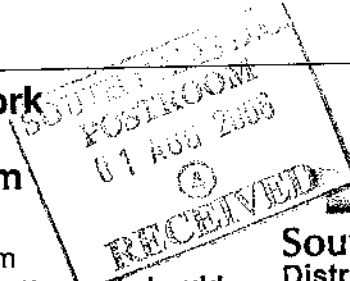


South Hams Local Development Framework Sherford Area Action Plan Response Form



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 Friday 11 August 2006** to guarantee that they will be considered.

For Official Use Only
Reference No. 2241
Date Acknowledged

Please complete this form if you are responding to the Sherford AAP only.

1. Personal Details

Title

First Name

Last Name

Job Title (where relevant)

Organisation (where relevant)

Address Line 1

Line 2

Line 3

Line 4

Post Code

Telephone Number

E-mail

2. Agents Details (if applicable)

Please Note: Following the Submission Stage consultation, if you wish to be notified by the Council of the publication of the Planning Inspector's recommendations, or the Council's adoption of the Sherford AAP, or both please provide the Council with your name and address to the Council's contact details at the end of this form.

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).

3. History of Representation

Did you raise the matter that is the subject of your representation with the Council earlier in the process of the preparation of the DPD, i.e. before it was submitted for Examination?

No

Yes (at Issues & Options Stage)

Yes (at Preferred Options)

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 DPD is:

Sound¹

Go to Q.4(c)

i.e. that you

support the DPD

Unsound

Go to 4(b)

i.e. you consider

the DPD should be changed

4(b). Nature of Representation

If you consider the DPD 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 development plan document fails.

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.
- (B) It is inconsistent with national planning policy.
- (C) It is not in general conformity with the regional spatial strategy.

¹ 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.

- 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

4(c). Nature of Representation

To which part of the DPD does your representation relate?

Paragraph

Policy

Proposals Map/Plan/Diagram

5. Changes to the DPD

Please give details of what change(s) you consider necessary to make the DPD sound, having regard to the test you have identified in response to question 4(b). You will need to say why this change will make the DPD sound. Please be as precise as possible.

See attachment. (separate sheet).

(Please continue on a separate sheet if necessary)

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:

[Empty box for outlining why attending in person is necessary]

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

30th July 2006

Please return your completed Sherford AAP 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**

Attachment to:

SHDC Local Development Framework Sherford Area Action Plan Response Form

Submission Stage – June 2006.

(Submitted by J Brophy)

1. As a member of the public unaccustomed to the due process required for planning I have found the process of responding formally to the above unnecessarily complicated and restrictive. There is a need for simplicity allowing the Public to respond to such an issue as the Sherford Proposal. This is simply not the case with the response form and the associated number of documents and associated references measures of soundness.
2. 1.6 of AAP reads :The Council is determined to vigorously address local priorities, particularly the delivery of affordable housing. It has adopted the aim of; "improving the well-being of the people of the South Hams" and has set itself the following priorities:
 - a) Secure a supply of housing for local people at affordable levels.

This statement is contradictory and does not meet the no.1 test of soundness - LDS or that of no. 3 sustainability with 50% affordable and rented housing.

How can a development at the extreme edge of SHDC improve the well being of the people of the South Hams? It serves mainly those people that live / work in the area of the development. It therefore does not improve the well being of the people of the South Hams. More accurately it serves the people of Plymouth. The housing needs of the people of the South Hams are not being served by this development as it is too local to a single area.

(Under the TCPAct 1990 – Local Plan was the requirement to provide housing for the people of the South Hams this is not being fulfilled by these proposals.)

3. '1.18 Sherford New Community is a cross-boundary proposal with elements lying within both Plymouth City and South Hams District. To address this situation the two authorities have worked closely with each other in developing the concept and vision for Sherford. Each authority remains responsible for the content and adoption of the AAP within its own area.'

This fails to meet soundness test number 4.

With regard to traffic along Vinery Lane and Sherford Road after the development has been completed.

Plymouth City Council Cross Border Strategy Diagram 3 indicates **'Local Access and Bus link only or Traffic Management Measures.** (These remain to be defined)

Diagram 5 of the SHDC Area Action Plan indicates **'Public Transport and Limited Access.**

There is no indication given as to how the above inconsistent statements will be achieved. Without such detail it is not possible to comment on their viability or if they will be 'sound'

Suggestion Close off vehicular access at a point in Vinery Lane and at the end of Sherford Road at the border between Plymouth City Council and SHDC. This will ensure that the air quality to the existing residents is not reduced from its existing level and that it will be possible to exit from Sherford Road onto the A379 expecting the existing delays or less. The consequences to the existing residents of this area of an increase in the volume of traffic along these roads will be unacceptable with regard to noise pollution, air quality, road safety, inconvenience.

Furthermore it is stated in Diagram 3 of the Sherford and North Plymstock Cross Border Strategy Diagram that the strategy diagram appears in both AAPs. The diagram is not the same!!!!!!!. Fails test of soundness no. 6. The devastation to the public playing fields (King George) and the use of Hays to take the traffic from the Sherford development are simply not sustainable. (Fails soundness test 3)
The requirement to build a park and ride/bus terminal could result in compulsory purchase of Elburton Villa football ground area. As a comparison against the Chittleburn option this has a massive detrimental effect upon existing facilities that are presently used by the people of the district. Strangely enough there will be no immediate direct detriment to the people of the South Hams. – 'closed the gap on Brixton'
Fails soundness test no. 5 wrt people of Plymouth!!

4.

See quote below:

From the sustainability report by Enfusion for Sherford.

‘5.12 The promoters of the Chittleburn option proposed that topography would contain the development, the A379 frontage would benefit from passing trade, building on the existing garden centre and garage, and the public transport corridor would work with the topography with the interchange being within walking distance of **Brixton and relieving Elburton of through traffic.**’

‘5.13 The EbD process determined that the Chittleburn Option did not form part of Sherford Valley and was detached from the walkable centres west of the Sherford Stream. It did not satisfactorily form its own centre within the overall structure that had emerged from the EbD process. The development would have closed the gap on Brixton and it comprised the need to create a defensible eastern edge to the development. The viability of the option was questionable as the development would have required building on steep land which raised cost/benefit issues. Therefore, it was decided to remove the Chittleburn Option and the Masterplan emerged which now forms the basis of the Sherford proposal.’

‘5.14 It is therefore apparent that the decision to remove the Chittleburn area from the development, by the Council and through the EbD process, has included a consideration of certain sustainability and environmental issues, including those relevant to the following SA objectives:

- 2: Access
- 4: Quality of the Built Environment
- 7: Economic Growth
- 8: Landscape
- 13: Energy

Where is the issue of traffic with regard to sustainability????? This rejection will result in an increase in the volume of traffic through Elburton that is not sustainable. It is bad enough at present.

*Why was there a need for a **DEFENSIBLE EASTERN EGDGE TO THE DEVELOPMENT**???? Going east is going to the South Hams !!!!!!! This is supposedly a development for the people of South Hams?*

5. 5.15 Therefore, further appraisal of the rejected ‘Chittleburn option’ is outside the scope of this SA.

Facile conclusion and not logical. Soundness test no. 3 again not met.

6. No statement on construction hazards/disruption etc. No segregation of industrial traffic from residential at Deep Lane.

4. Please note the following from the Plymouth Area Action Plan

9.50. Sustainable transport is at the very core of creating sustainable new neighbourhoods. The whole basis of planning for these areas focus on creating communities where the need to travel by car is removed for local journeys and that opportunities are provided for activities such as work, education and leisure in the locality which means that you can walk or cycle to them, and that to do so should be easier than driving. Not everyone will be able to meet all of their daily needs in their locality. Therefore, there must be access to a high quality, frequent, easy to use and affordable public transport service. Occupiers of the new neighbourhoods at Plymstock Quarry and Sherford, must regard the public transport option as the first choice of transport to principle destinations, such as the City Centre and Derriford area. Otherwise these developments will not be sustainable and the area will suffer from significant traffic problems, **for existing and new residents, as the transport corridor is not likely to be able to cope with everyone driving to work.**

Fails soundness test number 4.

7. Question with regard to finances – the development is the responsibility of SHDC. SHDC will receive the council tax payments for the development. Will SHDC fund contribute proportionately to any infrastructure requirements to meet the above public transport system? **This development from this perspective alone given the financial state of Plymouth City Council is 'Not sustainable as it is not affordable?'**
8. It is also concluded that SHDC is proposing a development that will reduce the quality of life for the people of the South Hams that already live in the area to the east of Plymouth City Council with regard to access to Plymouth City Centre. This is because of the volume of traffic that will result from the development. There not sustainable from this view point. Fails soundness test 4.
9. Why in diagram 5 Sherford Illustrative Plan is there a feature noted as an impora#tanat ridge. Important to whom? The people of Brixton – but surely this development is for the people of the South Hams as indicated at the beginning of the document?? Does this plan represent the most appropriate in all circumstances?? The lack of a clear traffic policy based upon realistic prognosis of the effects of the development especially with regard to traffic and communications means that the plan fails soundness test u8. The volume of traffic will be too great for the system to handle.

30/7/06.