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RGP/kb



5 October 2006

Mr J Oakes
 Forwards Planning Manager
 South Hams District Council
 Follaton House
 Plymouth Road
 TOTNES
 Devon TQ9 5NE

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Dear John

**SHERFORD AREA ACTION PLAN
 OMISSION SITE**

Further to my email please find enclosed a hard copy of our responses and the appropriate forms in respect of the above.

Yours sincerely

RAY PACKHAM
Project Manager

OMISSION SITE

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		Ray
Last Name		Packham
Job Title (where relevant)		
Organisation (where relevant)	PERSIMMON HOLDINGS	TURNER HOLDEN
Address Line 1		HAWKRIDGE HOUSE
Line 2	c/o Agent.	CHELSTON BUSINESS PARK
Line 3		WELLINGTON
Line 4		SOMERSET
Post Code		TA21 8YA
Telephone Number		01823 3666150
E-mail		ray@turner-holden.co.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).

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"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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:

Sound¹

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.

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.

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.

- (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 sheet

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:

We have concerns regarding the change + choice of sites at The Plymouth PAA/SSC7 and housing delivery.

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

05.10.06

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**

1. Persimmon Homes considers that the identification of additional land, effectively at Sherford would fail the test of soundness, **test 4**, on the basis that this would not provide for the range of sites which are required to meet the overall housing requirement and therefore contrary to **PPG3**.
2. We consider that Sherford + represents effectively "more of the same" rather than as part of an overall effort to achieve the housing requirements at the PUA. As we commented at the submission stage of the AAP, and in relation to our appearances at the Core Strategy Public Examination, there is a need to provide a range and choice of sites which are available and deliverable in the short term as well as in the longer term to meet the housing needs of the whole community.
3. In our view this particular proposal does not address that particular concern, since it will need to be integrated within the wider development programme being proposed for Sherford. Cooperation and coordination between the various interests; the Coop and Redtree, will complicate delivery and in our view would make implementation that much more difficult. Therefore in our view it also fails the test that would be required **under test 8**.