

TEST 2 – COMMUNITY INVOLVEMENT

Although this test is primarily intended for the DPD as proposed by the authority, if, Sherford as described in the AAP were to be replaced by “Sherford Refined” as proposed by Plymco (Plymouth & Southwest Cooperative Society, then the same test should be applied to the amended DPD. We maintain that this test could not be satisfied if such a change were to be made.

The adopted Statement of Community Involvement expresses an intention to go beyond the minimum “box ticking” approach to community consultation, to actively *involve* local communities in shaping future development (see particularly appendix A). Since 2003 Community involvement, through the Enquiry by Design process and the Sherford Community Steering Group has helped to develop the proposal in the AAP (see our submission on the Sherford AAP concerning Plymco’s misrepresentation of the Enquiry by Design process, repeated in 2.2.3 of their August 2006 submission).

The principles and the spatial strategy proposed by Plymco were rejected by the Enquiry by Design process. Although their agents have sought to exploit the inevitable disagreements and differences of interest within the various communities (see attachments 1 & 2) their alternative site proposal has not emerged from any community consultation process and given the time pressures involved, it is difficult to see how any meaningful public consultation or involvement could occur if this alternative were to be imposed at this late stage.

TEST 4 – CONFORMITY TO NATIONAL AND REGIONAL POLICIES

The alternative site is not in conformity with PPG 3. By detaching Sherford from the Plymouth conurbation, this proposal seeks to replace a planned urban extension with a freestanding new settlement. PPG 3 paragraph 67 creates a presumption in favour of urban extensions, with paragraphs 72-3 setting out the criteria under which new settlements may be considered, critically “where there is no more sustainable alternative”.

This principle was reflected during the development of the Devon Structure Plan, policy ST8 point 3, where the words “separate from” included in the earlier drafts were removed from the deposit version. This was more than a semantic change – it reflected a specific change of intention on the part of all the authorities to move away from their earlier concept of a freestanding new settlement. The Plymco alternative site is not in conformity with the purpose and intention of the Structure Plan in this respect. It also performs very poorly in respect of ST8 point 7 (future growth), addressed below.

TESTS 6 – CROSS-BORDER COHERENCE, & 7 – APPROPRIATENESS

Future Growth and Cross-border Coherence

One of the most serious weaknesses of Sherford Refined relates to longer-term growth. Whereas the Sherford AAP sets out a logical long-term growth path for the Plymouth conurbation in this area, Sherford Refined seeks to start with a freestanding new settlement, which must in the longer term either coalesce with the Plymouth conurbation, or sprawl into open countryside.

Assuming the former is preferable to the latter, then future growth eastwards or northwards would undermine the advantages claimed by Plymco, encroaching on mineral reserves or the power corridor, or the A38 for traffic purposes, for example. Similarly, attempting to confine development within a valley makes little sense if the next phases cause it to spread beyond the valley. The comparison with smaller rural settlements made in 3.2.3 of Plymco's submission is therefore spurious.

In the short and the longer term, Sherford Refined would unnecessarily disperse the Plymouth conurbation, reducing sustainability, as discussed below.

We invite the panel to compare the differing outlines of the Plymouth conurbation in the medium and longer-term produced by the AAP proposal, and by Sherford Refined. Which appears more coherent?

Deliverability

Plymco criticise the AAP on deliverability grounds, but their alternative proposal is fatally flawed in this respect. Plymco own a parcel of land adjoining the A379 at Chittleburn; their desire to develop this is the driving force behind their objections to the AAP. Much of the land at the eastern and northern ends of their Sherford Refined is under the control of Redtree, as is the land where the park and ride is shown, by Deep Lane junction.

Redtree, with whom we have been working for two years on the Sherford Community Steering Group have assured us they do not support this alternative proposal and would not voluntarily make their land available for it. Compulsory purchase would obviously introduce further serious delays.

Several years of work has gone into developing the AAP version. It appears from the sketchy map accompanying Plymco's submission that comparatively little work has gone into developing this alternative. If, as Plymco suggested at the earlier Examination, compulsory purchase were used, Redtree would not necessarily be under any obligation to share information beyond that already in the public domain, with competitors. Delays are bound to result from such a change at this late stage.

Although we have not always agreed with them, the fact that one organisation, Redtree, controls all the land proposed for Sherford clearly has advantages in terms of securing commitments to infrastructure, and deliverability. If delivering 4,000 homes by 2016 is a principal concern for the panel, then Sherford Refined would only introduce further delays, uncertainty and potential for conflict.

Sustainability – Land Use, Ecology and Energy

The proposed country park is an important strength of the AAP proposal, performing the following functions:

- A “green lung” for the new settlement, creating opportunities for local non-car based recreation
- A logical, defensible eastern boundary to the Plymouth conurbation maintaining the separate identities of Brixton and Elburton
- Longer-term protection for the southeastern slopes of the Sherford Valley. The Link Route Options Study (reference below) confirms the view of local people, that the ecological value of these slopes is considerably greater than the farmland which would be developed under the AAP version.

Sherford Refined would have none of these advantages. The slither of woodland and green land shown around it would be too narrow to perform any useful recreational or separating function, and would as a result, probably become rapidly degraded.

The proposal to leave the overhead power lines in situ would blight both the northern end of Sherford Refined and the northern end of the recreational land surrounding it.

The northwest orientation of the slope they propose to develop will increase energy consumption, as the potential for passive solar gain is reduced. The potential for wind turbines also appears to have been removed.

Sustainability – Transport

One principle on which all parties at the Enquiry by Design were agreed, consistent with the whole thrust of Government and regional policies, was that of walkable neighbourhoods. Sherford has been largely shaped by that principle. By spreading the residential areas over steep slopes separated by the river valley, Sherford Refined would undermine that principle.

The advantages claimed for the road link to the A379 appear to be largely based on short-term transitional arguments. To suggest a permanent change to the shape and growth pattern of a city conurbation in order to provide a better interim bus route seems ludicrous to us.

The disadvantages of the A379 link as proposed by Plymco are as follows:

- It would create a congestion point on the A379 where widening would be difficult, if not impossible. Even if priority were provided to the HQT vehicles at the junction, they would still join the main traffic along the single carriageway section between Chittleburn and the first roundabout in Elburton.
- The route from Sherford to Plymouth would be longer, increasing journey times and distances both for public and private transport with implications for energy consumption and CO2 emissions.
- It would shift the balance of traffic generation from the A38 to the A379. With the park and ride at the Deep Lane junction, the impact of the AAP

proposal on the A38 should be roughly neutral. The capacity for the A379 to absorb significant increases in traffic volume is clearly limited and the consequences of congestion will impact directly on the residential areas which surround it. Studies performed since the adoption of the Structure Plan suggest that a park and ride on the A379 would not be viable. It is difficult to believe that Sherford Refined would significantly alter that assessment.

- It is not clear from Plymco's plan what would happen to Sherford Road. With the main route offering such a (congested) detour to residents from the North of 'Sherford Refined', Sherford Road would inevitably become a 'rat run' (despite any traffic calming). The nature of that residential road, with no pavements in parts, make it particularly unsuitable for high volumes of through traffic. The alternative, blocking it off to through traffic, would further exacerbate the problems on the A379.

Plymco's report does identify some real disadvantages of the western link via Haye Road as shown on the AAP (dividing King George V Playing Fields, junction improvements which may require demolition of houses). The Link Road Options Study considers the pros and cons of the alternative routes, as does the Faber Maunsell Study which informed the Plymouth Eastern Corridor Study. Both concluded that the western route would perform better on a range of criteria. Neither suggested that a southern route was impossible, however.

If possible, we would prefer not to see the playing fields divided or houses demolished. The panel will no doubt weigh the pros and cons of the various possible road and HPQT routes. If the panel were to reject the findings of the studies and prefer a southern route to the A379, this would not justify moving Sherford south and east as suggested by Plymco. A southerly route would equally be possible from Sherford as proposed by the AAP – clearly a more sustainable location.

CHITTLEBURN – AN APPEAL TO THE PANEL

Since the Enquiry by Design process, Plymco as owners of land rejected for development have sought to oppose the plans for Sherford by a range of methods. They have spent considerable sums of money in financing the Enquiry by Design process and subsequent employment of agents, legal representatives and a PR firm.

If the outcome of this public examination is not to their satisfaction, there are reasons to fear a long term "war of attrition" by Plymco, or future owners of that land if they chose to sell it, with the aim of obtaining development rights on it. We believe this would be costly, distracting for the authority, worrying for local people, and if ultimately successful, would undermine public confidence in the whole planning process.

We hope the panel will therefore make a clear long-term statement in its report about the (non) suitability of the site at Chittleburn for development.

References

Scott Wilson, 2005, *The A379 Link Route Options Study*
Faber Maunsell, 2005, *Plymouth Eastern Corridor Study*

PLYMCO'S PUBLIC COMMUNICATIONS AND EXPRESSIONS OF SUPPORT FOR SHERFORD REFINED

Since the beginning of the Community Steering Group, two sources of grievance have remained unresolved:

- A feeling from Plympton representatives that Sherford has moved closer to Plympton since 2002, with particular concern about traffic (shared by other participants) and should be moved further away from Plympton (not shared by other participants)
- Concern in Elburton (shared by the other participants) about the road proposed through King George V Playing Fields

Plymco, who have held separate private meetings with elected members and some residents representatives, have sought to capitalise on these grievances to promote an alternative which would involve building on their land.

Attachment 2 is a leaflet prepared for Plymco and circulated to households within the eastern suburbs of Plymouth (but not, as far as we are aware, within the South Hams). We would ask the Council and the panel to consider whether this presents a fair and accurate representation of the two alternative proposals. In particular, we note:

1. The first diagram showing, erroneously, Sherford abutting Elburton with no "green corridor"
2. The second and third diagrams showing an "important ridge" separating Sherford Refined from Brixton (compare with the detailed map)
3. The absence of any reference to longer-term growth, as required by the RSS and addressed by Plymco's 2005 objection to the Sherford AAP

Similar diagrams were used at public displays in Plymstock and Plympton (none were held in South Hams) - again with no indication of longer-term growth.

We also note that during and following the public meeting in August 2006 run by the elected members for Plympton and Plymstock, standard forms were issued objecting to Sherford, and supporting Plymco's alternative, although at that time no maps were made available. We understand that some people who had completed those forms, when shown Sherford Refined, decided they did not support it.

In view of the above, we would invite the Council and the panel to treat standard forms or letters expressing support for Sherford Refined with some caution.

South Hams Local Development Framework

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

1213.



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	STEVEN	
Last Name	MELIA	
Job Title (where relevant)	SPOKESMAN	
Organisation (where relevant)	S.H.A.R.D.	
Address Line 1	29 HEATHER PARK	
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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)

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 ATTACHMENTS

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:

SHARD has been involved in the negotiations over Sherford and the various alternatives since the beginning. From a position of outright opposition, we have sought since 2004 to work with all parties involved in developing Sherford. Our broadly based membership, with no attachment to any particular location, has enabled us to take a broader and longer-term view of the issues involved.

Plymco's various submissions have referred, without elaborating, to alleged shortcomings in the Enquiry by Design and subsequent community involvement processes. We are well placed to give the panel a different perspective on those processes with a degree of detachment from the various localised concerns. We have participated in two previous public examinations (County and Regional). Since last year our spokesman has been pursuing a PhD in urban and transport planning, so is aware of the broader background to planning policy.

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**

26-9-06

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