

# 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.**

For Official Use Only

Reference No. ....

Date Acknowledged .....

THIS FORM SHOULD BE RETURNED BY 11.00 AM ON THURSDAY 12/10/06 TO THE COUNCIL OFFICES, SOUTH HAMS DISTRICT COUNCIL, 3-4 FOXCOMBE COURT, WINDYKE FURLONG, ABLINGDON, OXON OX14 1DZ

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

1. RESPONDENT DETAILS		2. CONTACT DETAILS OF THE OFFICE	
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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](http://www.southhams.gov.uk)).

**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:

**Do you consider the Alternative Site to be:**

**Sound<sup>1</sup>**  **Unsound**   
 Go to Q.5  Go to Q.4(b)   
 i.e. that you support the alternative site i.e. you do not support the alternative site to the one proposed in the Sherford AAP

**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 falls.**

Failure to meet a Soundness Test	Please tick one Test only
1. It has not been prepared in accordance with the authority's Local Development Scheme (LDS).	<input type="checkbox"/>
2. (A) It has not been prepared in compliance with the Statement of Community Involvement (SCI).	<input checked="" type="checkbox"/>
(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.	<input type="checkbox"/>
3. The plan and its policies have not been subject to sustainability appraisal.	<input checked="" type="checkbox"/>
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.	<input checked="" type="checkbox"/>

<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*

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 statement which deals with each test in turn.*

**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.**

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

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

Red Tree is the promoter of Sheford and South Hams' partner in 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

10 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

## SHERFORD AREA ACTION PLAN ALTERNATIVE SITE CONSULTATION

Response made on behalf of Red Tree LLP  
10 October 2006

### Introduction

Red Tree was specifically incorporated to promote Sherford. To this end it has worked closely with local planning authorities in order to deliver a comprehensive, locally responsive and widely owned proposal for the development. Much has been achieved to date and the joint proposals are reflected within the Sherford AAP. These proposals are fully endorsed by Red Tree.

The alternative proposals put forward by Plymouth and South West Co-operative Society – Sherford Refined – do not have the support of Red Tree. Whilst the Sherford Refined proposals are extensively over land within Red Tree's control, none of this should be taken as representing any degree of collaboration, nor any intention to do so at any time in the future.

Indeed Red Tree OBJECTS unreservedly to the 'Sherford Refined' proposals on the basis they fail to accord with policy; good practice; design principles and fail to demonstrate deliverability.

In more detail these comments are extended to relate to the various Tests of Soundness identified in the South Hams LDF Response Form.

### Test 2 : Accordance with SHDC Statement of Community Involvement

Sherford Refined does not accord with the Council's Statement of Community involvement (SCI).

The adopted South Hams SCI requires Sherford proposals to be developed in conjunction with wide-ranging public consultation, including with focus groups; with planning workshops (Enquiry by Design) and other meetings with local representatives and stakeholders. This activity was proposed to be replicated at all stages in the plan-making process.

The Sherford AAP proposals have emerged from the product of extensive consultation and participation. Involvement of The Princes Foundation and wide-ranging technical and local stakeholders have determined shape, form, size, content and phasing of the Sherford AAP proposal.

This process examined alternatives and found them wanting. Plymouth and South West Co-Op have tabled various proposals, all with one common theme, the inclusion of their specific, relatively small-scale land interest at Chittleburn. The inclusion of this land was rejected through the Enquiry by Design process, a conclusion supported by all the principal parties involved in the Enquiry by Design.

Until very recently the Sherford Refined proposals have been assembled by its promoters without the benefit of any wide-ranging consultation. Even more recent public activity has not involved any detailed analysis and scrutiny. The promoter has sought only to exploit local tensions, exacerbate local fears and has totally failed to demonstrate how the Sherford Refined Plan attends to good practice; design principles; character of the site; policy and delivery principles.

Not only do the Coop's proposals fail to comply with the SCI but they also actively obscure the inevitable consequences of their own proposals.

In all these respects Sherford Refined fails Test 2.

### **Test 3: Sustainability Appraisal**

The Sherford AAP has been subject to a Sustainability Appraisal. The planning application to be submitted by Red Tree, in support of the Sherford AAP, will also be subject to the rigour of a Sustainability Assessment.

No such test has been applied to Sherford Refined. Accordingly Test 3 is also failed.

### **Test 4: Compliant with Other Plans/Policies**

Sherford Refined does not accord with the submitted Sherford and North Plymstock AAP's.

Sherford Refined also fails policy requirements included within the adopted Devon Structure Plan 2001-2016. Therein the key policy relating to Sherford is Proposal ST8. This includes seven criteria that should be satisfied by any proposal for Sherford. The 'Sherford Refined' proposal fails by comparison with the Sherford AAP proposals.

#### **1) *be assimilated into the landscape of the area.***

The AAP proposals minimises land take and respects the need for green corridor linkages. These have been defined through detailed technical visual, geological, ecological, archaeological and landscape analysis of the site. Most proposed development is on south facing slopes mirroring local character and facilitating energy conscious design; delivers a community park, where considerable landscape and ecology enhancement is expected.

Sherford Refined involves land clearly outside the main Sherford Valley and embraces considerable areas of north-facing slopes. Major development is anticipated in the southern part of the valley where gradients are severe and ecological value at its highest. Development is also proposed within floodplain (including what appears to be the Town Centre itself).

The Enquiry by Design process determined that Sherford should provide a very clear eastern edge to the Plymouth urban area. The Sherford AAP proposal delivers this requirement, reinforcing clear and long-term boundaries between urban form and open countryside. The Sherford Refined proposal does not achieve this important objective and moreover sets a precedent for further sprawl.

**2) *avoid, as far as possible, the use of significant areas of the best and most versatile agricultural land***

The Sherford AAP proposals are predicated upon compact urban form and the delineation of a clear eastern margin. Sherford Refined is a much looser concept and must eventually deploy more agricultural land.

**3) *be well-related to existing settlements***

Sherford Refined is promoted as being disengaged from the existing communities of Plympton and Plymstock. The Sherford AAP proposals are accused of being too close to these existing urban areas

The intention of the DSP criterion is very clear. Sherford must be well related and engage with the existing communities. This has been a key instrument in the design concept anticipating that not only Sherford residents will benefit from investment in new facilities, such as open space, parks, playing fields, sports facilities, arrangements for youth, public transport, wider retail and other community arrangements, but also those living in Elburton and Plymstock. Not only that, but to make these facilities conveniently accessible by means other than the car. The Sherford AAP proposal show a development that is close yet **distinct** and achieves the necessary balance between accessibility and identity.

Sherford Refined does not seek to make any such provision and proposes a totally separate urban arrangement.

In terms of the wider context of the Plymouth Urban Area the 'fit' of Sherford is very clear as the logical extent of the eastern boundary of Plymouth for the foreseeable future. It acts as a 'plug' at the most easterly extent of the 'white hole' and it is this plug and its position relative to the Plymouth PUA that defines the future expansion of the site, its integration with Plymouth as a city and its clear boundary with rural South Hams. It is equally clear that Sherford Refined is not a 'fit'.

The relationship with existing development is an underlying basis for prioritising development in PPG3. The Coop proposals, by virtue of their own land interests, default to an unsustainable proposal for Sherford Refined that is isolated (at outset only) from all other existing development.

It is noticeable that all their promotional material describes their proposals not in terms of what they offer in themselves but in terms of the removal of issues they see as most mobilising local communities as follows:

**Proximity to Elburton** – It should be noted that they reproduce the Sherford AAP proposals erroneously showing coalescence with Elburton. It is also noticeable that in previous versions, clearly of the chameleon proposals of Sherford Refined ( Enquiry by Design and Sherford AAP Preferred Options Stage ) showed expansion butting right up to Elburton where co-incidentally the Coop has a further small land parcel.

**Route through King George V** –It should be noted that development commencing outside the natural boundary to any future development (the Sherford Valley bottom) will expand. It is most likely to do so in an easterly direction and as such will coalesce with Elburton and the eventual shape and form will require road access to the west which will bring forward the KGV alignment anyway. The outcome will ironically be exactly what local communities most fear; linear sprawl from Elburton to Brixton, the lack of any definition easterly development and a road north of Elburton. It is noticeable that probably with an eye to this the Coop removed the arrows indicating expansion as shown on the Preferred Options version of their proposals and the shaded area of development which shows their proposals properly coalescing with Elburton.

**Proximity to Plympton** - It has been proposed that there has been a 'recent' change in proposals for Sherford pushing the development north. This happened as an outcome of the Enquiry by Design in October 2004 – 'recent' is therefore not entirely accurate, dependent on one's idea of recent. Building on elevated or exposed land close to Plympton is cited as another fear removed. The A38 trunk road separates Plympton from Sherford and it is very apparent (by sight and by review of sections along the A38) that there is no line of sight. Sherford can neither be seen nor heard from Plympton. As the local representatives of Plympton are aware Red Tree has committed to pay for the installation of a bollard on Buller's Hill to negate any feared traffic impacts although Red Tree's Traffic Assessment does not predict the volumes of traffic locals fear.

During the Enquiry by Design the Coop proposed that a reason to move development away from A38 and therefore Plympton (or rather towards their land interests) was to avoid the constraint of the 'power corridor' comprising the overhead power cables and the high pressure gas main. While Red Tree's proposals remove the issue by re-aligning buried cables along the A38, the Coop now proposes to site housing under the very same power lines.

Traffic impact is cited as an important reason from creating 'separation'. This is not a policy requirement. Minimisation of car-based travel is a policy requirement and the layout, design form and phasing of the Sherford AAP proposal will minimise extraneous traffic to the benefit of Sherford, nearby communities and the wider network. No evidence exists to suggest that Sherford Refined will embrace the same rigour.

- 4) ***by link to Plymouth, at the commencement of development, by an effective high quality, high capacity public transport system; and***
- 5) ***include park and ride interchange provision accessible to the A38 and A379.***

The Sherford AAP proposals require the provision of a new road link from Deep Lane to A379 at the commencement of development. In harness, a new Park and Ride facility at Deep Lane is required.

These are fundamental provisions in the shape, form and delivery strategy for Sherford. A commitment is being made to deliver the A38-A379 road link in the first phase of development, in tandem with the full provision of a Park and Ride facility at Deep Lane.

This arrangement will enable a bus-based HQPT to be delivered, benefiting a wider community of interests – A38 traffic, Sherford and Elburton/Plymstock residents. Plymouth City Council has confirmed (North Plymstock AAP) there is no need for an A379 Park and Ride. The construction of the Main Street link within Sherford will be a major benefit to transport arrangements in the locality.

Sherford Refined does not explain how it will deliver or phase the link between A379 and A38 and does not offer any clarification as to how the Chittleburn area (its first development phase) will be linked in safe traffic and transport terms to Elburton. The A379 on the edge of the city is sub-standard, with single lanes in each direction and would require substantial engineering though into Elburton. The route through the proposed development traverses Sherford Valley and the ridge into Chittleburn Valley and will require costly (environmental and financial) engineering.

- 6) ***be accessible to the Strategic Road Network and the local highway system.***

Only the Sherford AAP proposal and the commitments being made by Red Tree satisfy this requirement. Early delivery of the Deep Lane Park and Ride facility will benefit considerably traffic flows on A38. Sherford Refined will be a spur development off the A379

- 7) ***be capable of accommodating further development beyond the current plan period.***

The Sherford AAP and North Plymstock AAP anticipate Sherford eventually expanding westwards parallel to A38 and north of Greater Hazeldene Quarry. The Proposals Maps in each case demonstrate the generality of this requirement.

- Red Tree's proposals will respect and safeguard this potential, including future access. In that regard the Sherford AAP and Red Tree's proposals are clear and transparent.

The Sherford Refined proposals are not so clear or transparent. No effort has been made to indicate how the proposals can accommodate potential expansion. As mentioned in 3) above it is explicit in the Coop's own previous responses to the Preferred Options AAP, where they indicated the direction of expansion and it is telling that these 'arrows' are now removed.

Draft Regional Spatial Strategy supports the growth and economic enhancement of Plymouth and makes it clear that it expects Sherford to expand to 7,000 dwellings by 2026. The Plymouth Core Strategy assumes Sherford expanding westwards.

All these policy thrusts indicate clearly that further growth demands will engage the Sherford Refined proposals westwards and northwards, to engage more closely with the existing urban form. Essentially this means that Sherford Refined will grow to expand into land currently proposed by the Sherford AAP and beyond.

Plymouth and South West Co-op argue that their proposal is separate from existing communities. The proposal in this regard is disingenuous at best.

#### **Test 6: inconsistent with Development Plan Documents**

Sherford Refined proposals are not in any form consistent with emerging proposals contained within submitted Plymouth and South Hams Core Strategies and the AAP's for Sherford and North Plymstock. There, cross-boundary co-operation has played an important part in progressing the Sherford proposals over the past two and more years.

The shape and form of Sherford Refined is a proposition rejected very early in this cross-boundary relationship.

#### **Test 7: No credible philosophy or evidence base**

An extensive evidence base supports the Sherford AAP proposals. The initial Enquiry by Design proposition has been subject to review and detailed testing on terms of:

- environmental;
- transport;
- major routes alignment;

- location of community facilities;
- green corridors, including safeguarding nature conservation interests;
- mineral interests;
- location of sports/recreation facilities;
- location of schools;
- retention of landscape and water features on site;
- relationship to existing communities.

In addition detailed assessments have been undertaken to investigate the scale of employment, commercial and retail floorspace necessary to create a vibrant, self-reliant community and detailed and open debate has been encouraged and hosted by Red Tree to promote the most effective and appropriate community management and governance proposals.

Phasing has been carefully considered and detailed discussions have taken place with the local planning authorities and service providers to determine the scale and timing of infrastructure and community facilities together with the level of financial support required and the procurement strategies for these elements of the development.

All these investigations and negotiations have created a robust evidence base. The Sherford AAP and Red Tree's proposals can be explained in detail.

No such depth of analysis or open debate characterises the Sherford Refined proposals which remain an enigma covered in the gloss of PR spin and the cultivation of fear.

Together with South Hams District, Red Tree has been exploring how to deliver an energy strategy that maximises the energy performance of buildings, the onsite renewable generation internal to the built form and including wind and minimizes Sherford's carbon footprint. No such commitment is apparent with Sherford Refined.

Supporting Sherford is also a very clear design philosophy aimed at providing an attractive place for people to live and work. The Sherford AAP sets robust challenges in terms of sustainable living. Red Tree supports these.

By comparison the Sherford Refined proposals are silent on evidence base; on community building; on design; on phasing and on the creation of a vibrant new place and the plans or wherewithal for delivery.

From this the only clear conclusion that can be reached is that it comprises a two-dimensional land use proposition that fails to engage with the very clear challenges set by policy and good practice. It is being promoted as a 'real contender', which sadly some local residents may see as the white knight when it is in reality a shadow to obscure the real and hidden agenda.

#### **Test 8: no clear mechanism for implementation**

Sherford Refined is promoted by a landowner who admits (South Hams Core Strategy Examination) to only controlling a minimum area of land (approximately 50 acres of Coop land and a further 50 acres under option as part of a near 1,000 acre development site). This interest may enable between 500 and 800 dwellings to be built. This capacity assessment may not be tested, but even if it is, Plymouth and South-West Co-op control less than 20% of the land required to implement Sherford Refined.

This cannot be a robust basis upon which to proceed.

At the South Hams Core Strategy Examination in July, the Plymouth Co-op representative advised that the residual 80% of land would need to be acquired through a Compulsory Purchase Order (CPO).

Whilst CPO powers are trailed as effective tools by the Sherford AAP and other advice, such as PPG3 (para 43 and 44), the reality is that policy intent does not anticipate such a major undertaking.

Sherford Refined cannot be delivered. To assume that it can is naïve.

#### **Test 9: Flexibility**

The Sherford AAP Proposals are derived from both a clear design strategy and technical investigation. Whilst the proposals provide a clear 'blueprint' upon which to proceed, the robustness of the design layout and phasing strategy also means that it is sufficiently flexible to be adaptable to unanticipated change.

The lack of any strategy within the Sherford Refined proposal makes for a very poor comparison.

Scott Wilson  
6 October 2006