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(Please reply to Banbury office)

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10 May 2007

Ms K Duffield  
Programme Officer  
South Hams Local Development Framework  
Sherford Area Action Plan Examination  
c/o South Hams District Council  
Follaton House  
Plymouth Road  
Totnes  
TQ9 5NE

Dear Ms Duffield

**TOWN AND COUNTRY PLANNING ACT 1990  
SOUTH HAMS LOCAL DEVELOPMENT FRAMEWORK  
SHERFORD AREA ACTION PLAN  
SCHEDULE OF SUGGESTED CHANGE AND POSSIBLE MINOR  
AMENDMENTS**

On behalf of Plymouth & South West Co-Operative Society I submit the following responses to the Suggested Change and Possible Minor Amendments.

**1) Para 7.41, 7.42 and 7.43**

**Comment**

The Sherford AAP recognises that delivery of on-site wind turbines may not be deliverable, or an efficient method to achieve the renewable energy targets for Sherford. As advised the wind turbines will be connected into the national grid. It is considered that the AAP should recognise the potential merit of off-site provision of wind turbines to achieve the renewable energy target.

**Submission**

Add new sentence after the words 'targets accordingly':

*Alternatively a strategy for the provision of wind turbines off-site generating sufficient power to meet the energy targets may be considered.*

Delete the word 'similarly' in the next sentence.

2) **Policies SNC12; 13 and 14**

**Comment**

The evidence submitted on behalf of PSW at the Oral Examination on retail issues demonstrated that there would be insufficient expenditure to support the quantum of floorspace expected at Sherford by the AAP. If the application of the term 'predominantly' is taken as meaning 51% convenience goods provision within the neighbourhood centres – then there would remain a deficit of at least £6.5m expenditure, available to support the level of floorspace expected by the AAP.

As such the proposed change to the AAP remains flawed and is not supportable by credible evidence. The AAP remains unsound.

**Submission**

The proposed change does not make the AAP sound. The AAP remains flawed in its overprovision of retail floorspace that may be supported by the availability of expenditure from the resident population of Sherford.

3) **Para 7.109**

**Comment**

The proposed change maintain requirement to construct the entire town centre, but now allows for the units to be unoccupied. The flaw in the AAP stems from the overprovision of retail floorspace that may be supportable by the resident population of Sherford as at 2011. There is an issue whether it is realistic and deliverable to expect a town centre to be built without adequate occupier demand to support the level of floorspace. A positive requirement that the accommodation 'will be used' to provide temporary accommodation ignores the realities of fit out costs – and the mechanism by which vacant possession may be secured.

**Submission**

It is considered that in the absence of evidence as to the delivery of the whole of the town centre, without occupier demand, and the potential difficulties that may arise from temporary uses, the AAP should be reworded as follows:

*Delivery of the whole town centre in Clause(1) refers to the buildings but does not require the units to be fully occupied for retail at the first stage of development and will be subject to further appraisal as to the viability of delivery. The town centre units will be gradually taken up to provide for the retail needs of residents*



*in phase with development. The balance may be used to provide temporary accommodation for a range of services pending permanent premises being completed.*

I trust the above submission adequately explain the position of my Clients.

Yours sincerely

A handwritten signature in black ink, appearing to be 'P J Frampton'.

P J Frampton  
*(Signed in the absence to avoid delay)*

Cc: Mr J Carter  
Mr A Henderson