

# South Hams Local Development Framework

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



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

**EVIDENCE BASE DOCUMENTS – SAVILLS REPORT ON PROPERTY MARKET AND MIXED USE FUTURES**

1. Personal Details

2. Agents Details (if applicable)

Title		
First Name	PLYMOUTH & SOUTH WEST CO-OPERATIVE SOCIETY LTD	PETER
Last Name	FRAMPTON	FRAMPTON
Job Title (where relevant)		
Organisation (where relevant)	FRAMPTONS	FRAMPTONS
Address Line 1	ORIEL HOUSE	
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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)).

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

<b>Sound<sup>1</sup></b> Go to Q.5 i.e. that you support the alternative site	<input type="checkbox"/>	<b>Unsound</b> Go to Q.4(b) i.e. you do not support the alternative site to the one proposed in the Sherford AAP	<input checked="" type="checkbox"/>
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### 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
<b>Failure to meet a Soundness Test</b>	
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 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 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 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*

#### **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.

**REFER TO ACCOMPANYING STATEMENT**

*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.

*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<sup>TH</sup> 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**

Our Ref: PTF/dsw/P086/PF/7523  
*(Please reply to Banbury office)*

[peter.frampton@framptons-planning.com](mailto:peter.frampton@framptons-planning.com)

10 October 2006

Mr. P. Tyler  
 Major Developments and Projects Officer  
 South Hams DC  
 Follaton House  
 Plymouth Road  
 Totnes, Devon  
 TQ9 5NE

Dear Mr. Tyler

**TOWN AND COUNTRY PLANNING ACT 1990  
 SHERFORD AAP – SAVILLS RESEARCH – EVIDENCE BASE**

It is understood that your Council relies upon Savills Research titled Sherford Stageland 2 Property Markets and Mixed Use Development Futures February 2006 as part of the evidence base to support the Sherford AAP. My enquiries with your department reveal that there is no form on which responses are requested. This correspondence constitutes a submission as to the soundness of the report on behalf of Plymouth and South-West Co-Operative Society.

The Savills Report is fundamentally flawed – and unsound – as an evidence base for Sherford for the following reasons:

- 1) Savills' report is predicated on the basis that Sherford will become 'a new town' (para 1.4). Sherford is an urban extension to Plymouth and is not intended to be a new town. In consequence analysis as to the facilities that may be achieved at Sherford based on comparator towns such as Tiverton and Wimborne – and aspirationally Marlborough – is not reliable. These settlements are free-standing towns serving a rural hinterland. Sherford should have been considered in its spatial context with the Plymouth urban area, particularly existing centres.
- 2) Savills' analysis of the property market is considered implausible. Major developments of this scale are intrusive to a wide cross-section of households. The suggestion that 'many of the potential occupants at Sherford will be older singles and couples rather than children' is not supported by cogent evidence and should be discounted. A wide cross-section of housing types should be provided at Sherford in order to create a balanced community.

- 3) It is understood that the Savills Report by Red Tree, a prospective developer for the new community at Sherford. The Report states (para 1.1) that one of the aims is to 'add value to their land interests.' At para 1.3 the Report states:

*'The output of this report, such as the detailed potential land use tables, should not be treated as a definitive guide to development but rather as a starting point for filling in the detail on the Sherford masterplan and to form the basis upon which this detail can evolve over time. Each sector and property type will probably need further detailed investigation prior to development.'*

On this basis it is submitted that little weight should be attached to the Savills Report as evidence for the Sherford AAP.

- 4) At paragraph 7.11 the Savills Report refers to retail development and states that there could be scope for at least two supermarkets. Savills comment this retail provision 'perhaps consisting of one 'upmarket' e.g. Waitrose, and one discount supermarket e.g. Asda, Lidl, Morrisons.'

It is entirely inappropriate for an alleged evidence based document expressing preference for a particular retailer. Furthermore the contention that Asda and Morrisons comprise discount supermarkets reveal as lack of knowledge as to the retail market.

I would be grateful if you would advise me when these submissions will be reported to the Council for consideration.

Yours sincerely,

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

cc. Mr. D. Fletcher  
Mr. J. Carter