

South Hams  
Local Development Framework

Sherford Area Action Plan

Area Action Plan Examination  
Topic Paper No. 4: Deliverability

## **Topic Paper No. 4 Deliverability**

### **1 Introduction**

- 1.1 This paper deals with the issue of deliverability of the Sherford New Community as set out in the Sherford Area Action Plan (AAP). Initially it sets out the background to the topic, but a fuller background to the proposal is contained in Topic Paper No.1 dealing with Location.
- 1.2 This paper goes on to deal with more detailed matters relating to deliverability and then addresses any outstanding issues raised by respondents.

### **2 Background**

- 2.1 The strategic requirements for Sherford begin with need, scale and location of the new community. These are dealt with elsewhere but there remains the requirement of timing and funding of delivery which is dealt with in this paper.
- 2.2 As with any major development Sherford will require significant elements of infrastructure to be provided in order to support the housing, employment, learning, health and leisure requirements of its residents. In particular a development of this size will have to deal with the identification of facilities and infrastructure requirements, timing of their delivery, funding and land control.
- 2.3 Recognising the importance of these matters the Council has adopted a proactive approach with key stakeholders to ensure early identification and resolution of issues which would impact on delivery. This is in line with PPS1 which encourages local authorities to engage in positive and extensive pre-application discussions with developers in order to facilitate development.

### **3 Strategic Context**

- 3.1 Sherford is a major strategic allocation of housing and employment provision for the Plymouth Sub-region and, together with the strategic employment allocation at Langage, is one of the largest strategic development locations identified for the south-west region in the draft Regional Spatial Strategy (RSS). As such the successful delivery of Sherford is of significance at the regional as well as sub-regional level and is important for the implementation of the RSS.
- 3.2 From regional to local level a plan led approach has been adopted. The preparation and adoption of the AAP is therefore important in providing a context for key agencies' actions and to guide private and public funding decisions. The timing of the adoption of a sound AAP is therefore important to the deliverability of the new community at Sherford within the strategic context.

- 3.3 The strategic requirement at Sherford extends to timing as well as scale. The Devon Structure Plan (DSP) requires the delivery of at least 4,000 dwellings by 2016 and the capability to accommodate further development beyond the plan period. The DSP is soon to be superseded by the RSS which is now at Submission stage. The RSS sets the requirement at 5,500 dwellings by 2026. The AAP fulfils the requirements of the Devon Structure Plan and the soon to be adopted Core Strategy and takes account of the emerging RSS. A key issue here is the extent to which the 2016 target of 4,000 dwellings remains a critical requirement when the emerging RSS no longer sets this as a milestone in the delivery of the 5,500 dwellings required by 2026. The Council consider that the need for housing is undiminished, a target of about 4,000 dwellings by 2016 will still be appropriate, and the Council has every expectation of this being delivered. Indeed to reach a critical mass that can deliver a sustainable community a higher rate of delivery is beneficial. However, the Council consider that this is an issue of phasing and, rather than treating the 2016 figure as a precise target and a critical measure of deliverability, it is more valuable as a clear guideline for the delivery trajectory. The Council have taken advice from Devon County Council, the Regional Assembly and the Government Office on this matter each of who agree that this is an appropriate approach to adopt.

## **4 AAP Context**

- 4.1 The AAP sets out the strategic requirements for Sherford and the development rates expected to be achieved. In the preparation of the AAP the Council has sought to ensure that the proposals and the requirements placed upon the development maintain the viability of the scheme. To this end the partnership approach adopted with key stakeholders including the developer has been crucial. The extensive work carried out to date has led the Council to a high degree of confidence in the viability of the scheme.
- 4.2 The Council have prepared a list of requirements for the development of Sherford with assistance from key service providers and agencies. The resulting details of scale and timing of provision have been used to prepare the requirements set out in the AAP. Further discussions with the developer has helped to identify appropriate timings and funding of infrastructure and services which will form an important part of the planning application.
- 4.3 In the process of identifying the most appropriate site for the new community through the EbD process a wide range of opportunities, constraints and issues were identified. Some which at first appeared to be constraints were, on further investigation, found to be issues which could be overcome. This was made possible by the convening of a number of EbD events with the intervening periods being used for detailed technical investigations. Included in this category was the relocation of a high voltage power line and a gas main which cross the

site. The requirement for their relocation has been factored into the assessment of the deliverability of Sherford from these early stages.

- 4.4 The infrastructure necessary for the construction of a sustainable new community at Sherford will be delivered by funding from a combination of public and private sources. Some of the elements, mostly transport related, will also be eligible for public funding or grant support. The transport elements are covered in the Transport Topic Paper and in the AAP itself. The other main area of public funding relates to Housing Corporation funding for affordable housing. This will be an area of ongoing work involving the developer and the Housing Corporation but Sherford is recognised as an important location for the delivery of affordable housing by the Corporation. The other elements are mainly related to sustainability and renewable energy grant funding.
- 4.5 The development planning process is, in part, intended to provide clear guidance for public and private funding decisions. For this reason the adoption of the Sherford AAP will be a significant step forward for the identification and release of this funding. The funding follows the Plan and not the other way around.

## **5. The Main Issues raised in the Submission Stage Consultation**

- 5.1 The main issues raised in the representations on this matter relate principally to.....
- a) Strategic requirements
  - b) Development rates
  - c) Viability
    - i) Timing and funding of infrastructure
    - ii) Relocation of infrastructure
- 5.2 The representations submitted on deliverability consider that the Sherford Area Action Plan fails to meet the following Tests of Soundness;
- 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 the adjoining areas
  - 4. (b) It is inconsistent with national planning policy
  - 4. (c) It is not in general conformity with the regional spatial strategy.
  - 6. The strategies/policies/allocation in the plan are not coherent and consistent within and between Development Plan Documents (DPD's) prepared by the authority and by neighbouring authorities, where cross boundary issues are relevant.

7. The strategies/policies/allocation 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 reasonable flexible to enable it to deal with the changing circumstances.

## **6. Summary of the issues raised and the Council's position<sup>1</sup>**

### **6.1 Re: Test of Soundness 4 (generally).**

6.1.1 RPS Planning on behalf of Plymouth City Council (Asset Management) (rep. 1936) consider that development rates are optimistic, and that Policy SNC1 should include the requirement for annual monitoring of the delivery of housing, which should be related to a 'plan, monitor and manage' approach of releasing additional housing to address any shortfalls (Applicable to Tests 4, 6, 7,8 and 9).

6.1.2 Respondents in Appendix 1, 2, 3 and Dr Mercer (rep. 423), D Godefroy (rep. 1698), A Street – Chaddlewood Farm Community Association (rep. 1952), Mr Rogers (rep. 2247), Mr Clowes (rep. 2243), Mr Rogers (rep. 2247), Mrs Rogers (rep. 2248), Miss Rogers (rep. 2249) consider the AAP is not a spatial plan and not had proper regard to other relevant plans, policies and strategies relating to the area or adjoining areas.

6.1.3 Respondents in Appendix 1, and 3 and D Godefroy (rep. 1698), consider that the AAP does not conform with Devon Structure Plan policies.

6.1.4 RPS Planning on behalf of Plymouth City Council (Asset Management) (rep. 1936) object to exclusion of "PCC's agreement" in respect to all of the strategies referred to in SNC17 (Applicable to Tests 4, 6 and 7).

### *The Council's Position*

6.1.5 *The monitoring of the delivery and performance of key aspects of the AAP is essential as part of the 'plan, monitor and manage' approach. This will be carried out through the Annual Monitoring Report as indicated in Chapter 9 of the AAP. Further details on this matter are contained in Topic Paper No. 5 - Other Issues.*

6.1.6 *The AAP has indicated in detail the regard taken of other relevant plans, policies and strategies during its preparation. These include all*

---

<sup>1</sup> Appendices referred to in this section can be found on the Councils website [www.southhams.gov.uk/sherford](http://www.southhams.gov.uk/sherford), and identify all those respondents who have made similar comments.

*appropriate national, regional and local planning policies and strategies and the community strategies of South Hams, Plymouth and Devon.*

- 6.1.7 *Devon County Council (DCC) and Plymouth City Council (PCC), the relevant Structure Plan Authorities, have been closely involved at all stages in the drafting and consultation of the AAP. DCC and PCC have advised the Council that the AAP is in general conformity to the DSP except as indicated in their representations now being dealt with through the Examination process.*
- 6.1.8 *Plymouth's involvement in the preparation of Strategies is fully understood and reference to this could be made.*

## **6.2 Re: Test of Soundness 4a.**

- 6.2.1 *DPDS Planning on behalf of Taylor Woodrow (rep. 1078) states that the AAP should recognise that there is uncertainty surrounding the strategic context for Sherford until the Inspectors binding report on the Core Strategy is received. All reference to 4,000 by 2016 is unsound (para 1.6, 1.25, 7.46 and SNC1) (Applicable to Test 4a and 9)*

*The Council's Position*

- 6.2.2 *The matter of the strategic context is dealt with in paras 3.1 – 3.3 above. The Core Strategy is soon to be adopted and conforms with the DSP which is the relevant adopted strategic document until it is superseded by the emerging RSS.*

## **6.3 Re: Test of Soundness 4b.**

- 6.3.1 *DPDS Planning on behalf of Taylor Woodrow (rep. 1078) consider that the delivery rate / timetable is unrealistic, and will not deliver 4,000 by 2016. Expected shortfall of 1,600 dwellings (Applicable to Test 4b and 9)*

*The Council's Position*

- 6.3.2 *This response was considered at the Core Strategy Examination and the Council's position has not altered. The Inspector's Core Strategy Report confirms that this delivery rate is appropriate, albeit with the added commitment to Plan, Monitor and Manage and to review which acknowledges and responds to Taylor Woodrow's concern.*
- 6.3.3 *The Council, in the AAP, the evidence base paper "Delivery Rates" and in Topic Paper No.1: Location, has set out in some detail the expected timetable for the delivery of 4,000 dwellings by 2016. The Council considers this to be a realistic timetable based on the co-operative approach which has been adopted to its delivery by all the parties involved. In addition the planning application, previously anticipated, has now been submitted. This clearly indicates that the practical issues*

*surrounding housing delivery and timing of infrastructure provision to meet the AAP policy requirements are continuing to be advanced within the timescales envisaged at the Core Strategy Examination.*

#### **6.4 Re: Test of Soundness 4c.**

- 6.4.1 Turner Holden on behalf of Persimmon Homes (rep. 1130) consider that delivery is unrealistic, and that there is no foundation for 5,500 dwellings other than draft RSS Policy, thus is not in conformity with established policy.

##### *The Council's Position*

- 6.4.2 See Council Response in para 6.2.2 above. The emerging RSS has reached submission stage and is a document to which the Council has had regard in the preparation of the AAP. The Council have taken advice from the Government Office South West and from the Regional Assembly who have endorsed the approach taken on this matter.

#### **6.5 Re: Test of Soundness 6.**

- 6.5.1 Devon County Council (rep. 920) considers that SNC2 should include a clear and consistent statement of the phasing anticipated for the proposed development. DCC also seeks clarification for the delivery timetable for 5,500 dwellings. (Test 6)

##### *The Council's Position*

- 6.5.2 *This is a matter of phasing and will need to be reviewed following adoption of the RSS. However, the Council considers that the target of 4,000 dwellings by 2016 is achievable, with capacity for further growth in line with existing Structure Plan and emerging RSS requirements.*
- 6.5.3 *See also Council Response in para.6.4.2 above.*

#### **6.6 Re: Test of Soundness 7.**

- 6.6.1 Turner Holden on behalf of Persimmon Homes (rep. 1130) consider that the various strategies required to be in place or at an early stage of development is achievable in the longer term, not within the timescales identified in the AAP. Plan is unsound in this respect (Applicable to Test 7 and 8).
- 6.6.2 Respondents in Appendix 1, 2 and 3 and D Godefroy (rep. 1698), A Street (Chaddlewood Farm Community Association) (rep. 1952) consider that the AAP is not founded on a robust evidence base and is not the most appropriate site considering the alternatives

- 6.6.3 Devon County Council (rep. 920) considers that the AAP should clarify outcomes the 'strategies' need to deliver and set out the scope of such details the strategies must contain (Test 7)

*The Council's Position*

- 6.6.4 *The Council considers the strategies required are a key element of any outline application for such a major development in order to fully visualise the proposal, and to ensure clarity and certainty in any consent which is granted. The strategies to be submitted by any developer as part of an application should not therefore involve any delay in the deliverability of the development. On the contrary this will help to achieve the delivery as required. This is another example of the significant progress which can be made through extensive pre-application co-operation between key stakeholders and reinforces the Council's confidence in the deliverability of the proposal.*
- 6.6.5 *The assertions made about the evidence base and the appropriateness of the site contain no evidence in their support. The Council considers that the evidence base and the proposals leading to the choice of site are thorough and sound.*
- 6.6.6 *The Council considers that the delivery of required infrastructure from the commencement of development is entirely realistic and achievable. The Council has been discussing the detail of a proposed planning application with Red Tree for several months, and this has now been submitted. There are also ongoing detailed negotiations with Red Tree in relation to the implementation and delivery mechanisms for the Heads of Terms of a Section 106 Agreement that will provide the funding for transport improvements and other benefits required by Policy. The Council considers this will be capable of implementing the vision of the AAP.*
- 6.6.7 *The contents and outcomes of the strategies have been further developed in consultation with key stakeholders since the submission of the AAP but it was considered that this would have been too great a level of detail to include in the AAP itself.*

**6.7 Re: Test of Soundness 8.**

- 6.7.1 Devon County Council (rep. 920) supports the AAP's aspiration for a sustainable community, and considers the AAP satisfies the Test of Soundness. However, the AAP should provide additional detail in respect of enforcement and monitoring, targets for delivering high level objectives and provision of different services and facilities.
- 6.7.2 Turner Holden on behalf of Persimmon Homes (rep. 1130) question resources available to deliver the strategies and implementation programme within Policy SNC8.
- 6.7.3 Devon County Council (rep. 920) consider that Para 8.1 needs to be reworded, to state all development will be required to make appropriate

contributions, remove 'unacceptable burden' (Test 8), and state that development must not be prejudiced by the availability, or not, of external funding sources.

*The Council's Position*

- 6.7.4 *The Council welcome the support from DCC and concur with the need for targets and outcomes for monitoring purposes. This will be dealt with in Topic Paper No.5 – Other Issues.*
- 6.7.5 *The Council recognises the clear need for all the elements of SNC8 in order to create a successful and sustainable community. It has and will continue to work with all key stakeholders to identify opportunities to implement these measures, some at little cost or with grant aid. The developer is advancing a strategy to deliver these requirements as part of their application.*
- 6.7.6 *The wording of para 8.1 seeks an appropriate balance of responsibility to ensure deliverability for all necessary developments.*

**6.8 Re: Test of Soundness 9.**

- 6.8.1 Turner Holden on behalf of Persimmon Homes (rep. 1130) consider that Para 8.7 is unrealistic in terms of quantum of housing to be developed, infrastructure costs and delivery timescales, (Applicable to Tests 7,8 and 9). They also consider there is a lack of alternative sites for accommodating development in Plymouth and South Hams, and therefore housing delivery for the PUA is under threat, and the Plan fails Test 9.

*The Council's Position*

- 6.8.2 *Efficiencies of scale will help to achieve the quantum of development On-site fabrication opportunities can be achieved on a single large development site such as Sherford provided appropriate measures are taken to ensure design quality and an appropriate residential environment. This requires a detailed and well managed Construction Environmental Management Plan. Details of infrastructure costs have been dealt with earlier in this Topic Paper and is therefore not repeated here.*

**7. Comments where respondents have not related them to a Test of Soundness**

- 7.1 GOSW (rep. 1) consider that too much reliance placed on the production of 'strategies' to accompany the planning application, rather than on the whole Plan itself to provide a robust basis for further planning/design/delivery work.

- 7.2 GOSW (rep. 1) consider if the substantive proposals are clear (in Policy SNC17), S.38(6) has implications for the contents of the planning application without the need for a separate policy. They consider it would be helpful if the processes were referred to in the Reasoned Justification, and not necessarily in the policy. Criterion 2) EIA is subject to separate legislation, additional requirement is unnecessary and could lead to complication.
- 7.3 GOSW (rep. 1) consider that criterion 1) the key delivery proposal should be limited to the implementation of phased comprehensive development (Masterplan and stakeholder involvement are covered elsewhere).
- 7.4 Devon County Council (rep. 920) considers the AAP must have commitments to deliver the objectives set out in para 7.65 at the outset.
- 7.5 Devon County Council (rep. 920) support the AAP's approach to achieving best practice in sustainable development in Policy SNC2, but consider that it would be helpful if the AAP gave clear guidance as to how it expects the aims to be achieved, and how the targets for on site renewables and carbon emissions will be delivered.
- 7.6 Plymouth City Council (rep. 1110) object to delivery of affordable housing outside the PUA, with respect to para 7.56.
- 7.7 Turner Holden on behalf of Persimmon Homes (rep. 1130) consider the list of requirements in relation to para 7.20 – 7.32 is extensive and express concern for delivery. They also question resources available to deliver the facilities in para 7.29.
- 7.8 Turner Holden on behalf of Persimmon Homes (rep. 1130) do not have an objection to approach of SNC3 (of the design strategy, town and detailed codes), but it imposes another level of requirement on the new community, which raises doubts over the deliverability in the timescale.
- 7.9 South West Regional Assembly (rep 1250) support the affordable housing target, but state that evidence of deliverability is required.
- 7.10 Mr Eden (rep. 1659) considers that there is no clear mechanisms for delivery of affordable housing
- 7.11 Mr Godefroy (rep. 1698) considers the AAP is premature, the TA and EIA should inform the AAP strategy and design
- 7.12 Devon Rural Transport Partnership (rep. 2244) support the general principles of Policy SNC7, but state that the details of delivery are not clear.
- 7.13 Red Tree (rep. 913) and Devon County Council (rep. 920) highlight the fact that 2009 is missing from the delivery programme (completion of 300 dwellings) (in para 8.7)
- 7.14 Devon County Council (rep. 920) consider that there is inconsistency between para 7.13 and 8.7 with respect to delivery rates.
- 7.15 Plymouth City Council (rep 1110) object to 'town' in SNC17 (2), and state that Sherford will be a sustainable community.

- 7.16 Plymouth City Council (rep. 1110) consider that reference in SNC9 (1) should be made to proportionate contributions toward the delivery of a landscaped green corridor to provide a green pedestrian and cycle link between Sherford to Stag Lodge and Saltram House.
- 7.17 The Highways Agency (rep.1129) support para 8.1, but reiterate that No HA funding is available for upgrades to the Deep Lane junction.
- 7.18 The Highways Agency (rep 1129) suggest the removal of 'outline' from SNC17
- 7.19 Environment Agency (rep 1202) wish to see included Policy SNC17 reference to the requirement of a Flood Risk Assessment to be carried out and submitted with the application, in accordance with PPG25.
- 7.20 Plymstock Community Forum (rep 1222) consider that off site delivery of affordable housing must include Elburton and Plymstock
- 7.21 Devon & Cornwall Constabulary (rep 1900) consider that planning contributions towards policing facilities should be considered as an integral part of any planning contribution.and that Policy SNC17 should include reference to the need for a Type 2 Police Station.

*The Council's Position*

- 7.22 *The Council is satisfied that the Plan provides a robust basis for further work which will be expressed through the strategies. The Council consider that the Plan contains an appropriate level of detail to inform the next stage in the planning process and further detail would have been excessive.*
- 7.23 *The Council accept that not all elements might be essential to be listed in Policy SNC17 but consider that clarity is best served by their inclusion.*
- 7.24 *The objectives set out in para 7.65 are reflected in Policy SNC7.*
- 7.25 *It is considered inappropriate for the AAP to go into excessive detail on the means of implementing targets for on-site renewables and carbon emissions. Developers would be unreasonably constrained in their choice from a suite of options that are available, and these will change over time, especially as new technologies are made available and differential costings change.*
- 7.26 *It is recognised that not all off-site delivery of affordable housing should be delivered outside the PUA and careful consideration should be given to an appropriate distribution if and when the situation arises. Para. 7.56 could be modified to reflect the inclusion of the PUA.*
- 7.27 *The list of requirements to be delivered at Sherford is extensive but it is that which will be necessary to create a complete new sustainable community fulfilling the vision for Sherford set out in Policy. The Council remains confident that these requirements are not so onerous that it will discourage developer interest. Indeed the submission of a planning application for the delivery of the new community, and the*

*possibility of another, gives further confidence that the requirements will be met (see also 6.6.6 above).*

- 7.28 Mechanisms for delivery of each element will be required, as normal, through the planning application process.*
- 7.29 The AAP must necessarily precede a planning application in order to provide an appropriately plan led approach.*
- 7.30 The Council acknowledges an erratum in the table in para. 8.7. The line headed 2008 should be amended to read "2008 - Initial infrastructure works" and a new line inserted after it to read "2009 - 300 dwellings".*
- 7.31 The Council see no inconsistency between para. 7.13 and 8.7 with respect to delivery rates as para 7.13 is referring to facilitating the build up to the rate of 500 dwellings per year and not to the delivery of such a rate in year one.*
- 7.32 The new community at Sherford will be identified by a number of terms relating to its various functions. In terms of community functions it will be called a town. This is an appropriate term, particularly as its local governance will properly be via a Town Council.*
- 7.33 The Council consider that the corridor to Saltram House would be more appropriately delivered as a requirement upon the development by the North Plymstock AAP as the corridor falls wholly within the Plymouth City boundary.*
- 7.34 The Council consider the requirements of SNC17 are appropriately applied to the outline planning application stage.*
- 7.35 The Council recognise the need for a Flood Risk Assessment to be included within the requirements of SNC17 and accept an amendment to the policy could be appropriate.*
- 7.36 The requirement for police facilities (including a type 2 police station) is appropriate within the AAP as part of Policy SNC4 but not in Policy SNC17.*

#### Support

- 7.37 Environment Agency (rep 1202) and Plymouth City Council (rep 1110) support Policy SNC17*

#### *The Council's Position*

- 7.38 The Council welcomes the support of the Environment Agency and Plymouth City Council.*

## **8. Conclusions**

- 8.1** The Council has carried out extensive and detailed work with a wide range of stakeholders, including the developers, to ensure the

infrastructure and facilities required in the AAP are appropriate and deliverable. The Council is confident that the AAP sets out the requirements needed to bring forward a new community at Sherford and that these requirements will not be so onerous as to discourage the generation of development proposals to implement the AAP.