

No.	Organisation	<p>Comment- Note, where responses are summarized, the full response appears on the District Council website https://eastdevon.gov.uk/planning/neighbourhood-and-community-plans/neighbourhood-plans/neighbourhood-plans-being-produced-in-east-devon/sidmouth/#article-content</p>
1	Devon & Cornwall Police	<p>Policy 22 – A Safe Town</p> <p>It is pleasing to see the inclusion of this Policy 22 – A Safe Town within the Plan. We support the statement that ‘<i>All new developments should conform to the ‘Secured by Design’ principles and the Neighbourhood Plan will support development proposals aimed at improving community safety</i>’. This is supported in the justification that ‘<i>the objective of the plan is to maintain the Sid Valley as a safe community where crime is low, and the emphasis is on prevention. It is recognised that the design of the built environment can play an important role in “designing out crime”.</i>’</p> <p>To reinforce the policy, the principles apply to all forms of development not just housing. They may also be just as relevant for new car parks, footpaths, play areas, commercial developments etc. By implementing such principles it will not only hopefully reduce the opportunities for crime and ASB, but also help reduce the fear of crime.</p>
2	Devon Countryside Access Forum	<p>Access and Connectivity chapter p.36 onwards</p> <p>The Devon Countryside Access Forum Neighbourhood Plan Position Statement should be cross referenced against the neighbourhood plan.</p> <p>The Devon Countryside Access Forum would welcome additions to this chapter as outlined below:</p> <p>The chapter on Access and Connectivity would be enhanced by including a map showing the extensive public rights of way network (footpaths and bridleways) in the Sid Valley and other access opportunities such as Fire Beacon Hill. These contribute to connectivity and health and wellbeing. The Neighbourhood Plan acknowledges that the consultation responses refer to “the importance of opportunities to walk, cycle and relax in beautiful surrounding.” The public rights of way network, alongside local green spaces, provides many of those opportunities.</p>

3	East Devon AONB	<p>Policy 3 Pg 17 of the Main Plan</p> <p>Many thanks for consulting on Regulation 16 Consultation. Our compliments on completing this work. We have a minor comment on the following para on pg 17.</p> <p><i>Sid Valley Place Analysis</i> "Landscape is a key issue, not least because the Plan area is set entirely within the nationally designated landscape of the East Devon AONB. The AONB designation <i>washes over</i> the smaller settlements in the NP area and directly abuts the 'Built Up Areas' boundary of Sidmouth (3.1.0 Wider landscape CONTEXT AND AONB); Development ...must be compatible with national policy and the AONB Management Plan." "Have Your Say" Workshop at Kennaway House, (2.2.0 THEME: Our Built Environment; 2.3.0 THEME: Our Natural Environment) NPPF 2012 paras 76, 77 and 78 and "Conserving and enhancing the natural environment" paras 109-125 NPPF 2018 Paras 72e, 133 and 170 East Devon Local Plan Policies 2013-31 Strategy 26: Development at Sidmouth</p> <p><i>'washes over'</i></p> <p>Consider rewording along the lines that the smaller settlements fall within the AONB designation or that the AONB designation covers/encompasses these areas. – <i>washes over</i> has other interpretations and is not our preference. NPPF (2018) Policy 172 is also of relevance here.</p> <p>Please note that the AONB Management Plan (2014-19) has been reviewed and updated and is due to be considered for adoption by EDDC early February. The revised plan has been renamed 'The East Devon AONB Partnership Plan' and will be effective from 1 April 2019 – 31 March 2024. Once adopted, the final copy will be posted on the AONB website www.eastdevonaonb.org.uk .</p>
4	EDDC	<p>Policy 2 – Suggested revision of text relating to building heights</p> <p>Policy 3 –the policy is considered overly restrictive beyond the policy contained in the Local Plan and suggested that the policy is closer aligned to map 10, the Sidford Sidbury Non-coalescence area.</p> <p>Policy 4 – suggest a positive policy approach is adopted</p> <p>Policy 5 – the policy is considered overly restrictive and allows complimentary development</p> <p>Policy 9 – suggested that the settlement areas are defined and further clarification is provided of policy wording</p> <p>Policy 10b – the policy introduces exception sites adjacent to Sidmouth BUAB that are not supported through Local Plan strategic policy.</p> <p>Policy 11 – EDDC consider that policy 11 is largely a repeat of Strategy 34.</p> <p>Policy 12 – Seems overly prescriptive as written – requires flexibility.</p> <p>Policy 13 – Clarification sought regarding assessment of eligibility for housing</p> <p>Policy 14 - Policy 14 is likely to reduce the viability and supply of new homes. Principal Residency Policy would also be difficult to manage and enforce. With only 8% of the homes in the plan area being second homes or holiday lets, we do not consider this approach to be justified or in conformity with the Local Plan.</p>

		<p>Policy 22 – <i>‘All new developments should conform to the ‘Secured by Design’ principles...’</i> This seems onerous for the developer, suggest editing to <i>‘should illustrate how they have considered and, where possible, implemented ‘Secured by Design’ principles’</i>.</p> <p>Policy 24 - <i>Any development of Eastern Town will be expected to demonstrate via an access strategy how the scheme will improve the cycle pathway linkages with the town centre and the wider area’</i> – Seems onerous on a private developer of an already well connected space.</p> <p><i>‘Vehicular access to and from the Esplanade turning circle should be restricted to service vehicles, coaches and boat trailers.’</i> This seems to be a highway consideration and should be deleted.</p> <p>Policy 26 - Policy seems over prescriptive in terms of final outcome from redevelopment. Eastern Town contains multiple buildings and spaces serving a variety of functions. Replacement of existing assets should be proportionate to the proposed development impact.</p> <p>Also minor revisions to text / copyright / table of contents etc.</p>
5	Highways England	No comment
6	Historic England	No comment
7	M Walden-Till	A number of typographical errors and inconsistencies were raised and a request to avoid jargon.
8	Natural England	Policy 3 (Settlement coalescence and green wedges) refers to ‘Green Wedges’ shown on map 10. However Map 10 only shows the Built Up Area Boundary (BUAB) the Sidford/Sidbury Coalescence Area and a strategic employment allocation. This is confusing. We suggest that the green wedges be shown on map 10 or specific reference to these areas be removed from the policy.

		<p>Policy 6 – Protected Open Spaces. There is a typo here. Policy 6 refers to Map 17 but protected open spaces are shown in Map 16.</p> <p>In respect of Sidmouth we note that the Built Up Area Boundary (BUAB) shown in the Neighbourhood Plan reflects the BUAB boundary set out in the adopted East Devon Local Plan (EDLP) and that EDLP strategy 26 refers to housing and commercial development within the BUAB.</p>
9	R Eley	<p>Just a small point: Fig 102 in the Place Analysis is wrongly coloured and/or annotated. This has the effect of declaring the land my family own and that to the north, owned by the Hayman family, as public open space. It isn't of course.</p> <p>The map to the south showing the College etc. Is correctly shaded.</p>
10	S Barnes	<p>PORT ROYAL AREA. The swimming pool is in need of complete refurbishment. The changing rooms are dirty. There are insufficient showers. It is an embarrassment to British tourism and the facility does not encourage new swimmers who require exercise indoors. If it was redesigned extra pool space for young children, mothers and babies could be built in the area currently occupied by the Tourist office. The Tourist office could be moved to a better, more obvious location, such as the empty building next to the Sailing club. This could also include coffee shop for Tourists and a hub for locals.</p>
11	Savills for LVA	<p>Concern that the plan is primarily Sidmouth focussed and lacks regard for Sidbury.</p> <p>Suggests that the plan misses an opportunity to include site allocations in Sidbury.</p> <p>Provides an outline of the clients interest / site South of Furzehill, Sidbury.</p> <p>Provides an assessment of the alternative opportunities for development in the Sidbury area.</p> <p>Policy 1: Suggest that draft Policy 01 should be made more flexible to facilitate the delivery of development outside of BUABs to respond to an identified local housing need.</p> <p>Policies 2-6 (Built and natural environment): As set out in the previous Section, the inclusion of the environmental policies 2 – 6 is supported. The Land South of Furzehill provides a significant opportunity to deliver small scale residential development without impacting of these locally designated areas.</p> <p>Policy 10a (Residential Development): As per comments made in response to draft Policy 1, it is considered that Policy 10a should include flexibility to respond to an identified local housing need, and that wording should be incorporated to make it clear that should land on the edge of settlements, which is suitable and sustainable, be available to deliver housing to meet an identified need, a positive approach will be taken to facilitate the development of such sites.</p> <p>Policy 10b (Exception Sites): It is noted that draft Policy 10B is consistent with adopted District wide policy on exception sites, and does not therefore propose anything different in this regard. We consider that a caveat should be added to policy 10B to confirm that where viability considerations indicate that the requirement of 66% affordable housing cannot be delivered such proposals will be treated favourably.</p> <p>Policy 16 (Shared Use Paths): We support Policy 16 and, as stated in the previous section, there is an opportunity to deliver a section of the Sidford to Sidbury pathway through the Land South of Furzehill, thereby avoiding the need to</p>

		<p>negotiate a very narrow section of the A375 (Chapel Street). The Steering Group is encouraged to explore this opportunity before the Plan advances through examination.</p> <p>Full copy available at: https://eastdevon.gov.uk/media/2814635/savills-for-lva.pdf</p>
12	Sid Vale Association	<p>Minor grammatical observations and recommendations to improve clarity. Questions on jargon and some of the planning fundamentals. Expression of opinion on multiple policies.</p> <p>Key observations:</p> <p>Policy 5 – Local Green Space mapping should be improved for clarity. Maps as shown are far too small in scale. Suggested that the area covering the Byes be extended.</p> <p>POLICY 11 AFFORDABLE HOUSING, (AND ADD SOCIAL HOUSING)</p> <p>i. With 10 or more units, Policy 11 states that a maximum of 50%, (i.e. 5 in a development of 10,) can be market housing, with a minimum of 50% affordable, (i.e. 5), of which 3 should be rentable and 2 should be for sale. This is far more drastic than Local Plan Policy H2, which states that “a mix of dwellings must be provided on a development of 15 or more”. The NP Policy 11 will render any development uneconomic, due to the constraints imposed on a developer. Thus, there will be a severely reduced potential of Affordable housing both for rent and for sale.</p> <p>Full comments available at https://eastdevon.gov.uk/media/2814638/sid-vale-association.pdf</p>

13	South West Water	No comment
14	Sport England	No specific comments provided. Standard response available at: https://eastdevon.gov.uk/media/2814644/sport-england.pdf
15	Turley for Bloor homes SW	<p>Bloor Homes has an interest in land within the Neighbourhood Area, specifically land at Sidford High Street, Sidmouth (see Site Location Plan enclosed at Appendix 1). The Town Council will be aware of Bloor Homes land interest in this location, from their previous Neighbourhood Plan consultation.</p> <p>Given this existing land interest, Bloor Homes has an interest in policies and strategies set out in the emerging Neighbourhood Plan and seeks to ensure that an effective plan for this area is achieved, which aligns with key aspects of national planning policy. Amongst its primary functions, the Neighbourhood Plan should specifically respond to and reflect relevant national and local planning policy (as set out in the 2018 National Planning Policy Framework [“2018 NPPF”] and the Development Plan for East Devon).</p> <p>Our representations made to the submission draft consultation of the Sid valley Neighbourhood Plan focus on the following policies:</p> <ul style="list-style-type: none"> • Policy 2 – Protection of Key Views <p>Bloor Homes still has fundamental concerns with the drafting of this policy. As currently drafted, the policy continues to be ambiguous and as a result it is unclear how it is justified and will be effective. Fundamentally we disagree with the purpose and inclusion of Policy 2 within the Neighbourhood Plan. Many of the Key Views that the policy is set up to preserve are located outside of the settlement boundary of Sidmouth and are located within the East Devon Area of Outstanding Natural Beauty</p>

[AONB]. The boundary of the AONB is defined tightly around the settlement boundary of Sidmouth. Many of the Key Views are therefore already controlled by the existing designation of the AONB, where views into and out of the nationally designated areas will be a relevant consideration when planning new development and making decisions in respect of planning applications.

Bloor Homes request that this policy is removed from the Neighbourhood Plan, due to it being unclear and unnecessary. It therefore fails to meet the basic conditions of plan-making as established within Chapter 3 of the 2018 NPPF.

- Policy 3 – Settlement Coalescence and Green Wedges

Question the quantity of technical evidence provided to support the policy and suggest that current policy is overly restrictive.

- Policy 10a – Residential Development

The current drafting of Policy 10a would be unduly restrictive and frustrate the future residential development of land outside the BUAB of Sidmouth, and is therefore likely to generate conflict with the future development plan for the area. The current drafting of the Neighbourhood Plan is unlikely to meet the basic conditions required for the plan to be put to referendum and to be made on this basis.

In accordance with the PPG, the Neighbourhood Plan Group should produce evidence to demonstrate how they have engaged with the local planning authorities preparing the GESP, to ensure that there will be no conflicts between the two policy documents.

- Policy 10b – Exception Sites

It is considered that the future growth of Sidmouth will provide an important function within the wider context of East Devon. Future development sites that are located adjacent to the existing settlement boundary within Sidmouth and which can adequately accommodate future open market residential development should not be precluded from coming forward by overly restrictive policies. Again, the drafting of this policy fails to meet the basic conditions for a Neighbourhood Plan policy. Therefore, this policy should be removed from the Neighbourhood Plan.

- Policy 11 – Affordable Housing

We support the essence of Policy 11, however to ensure compliance with the PPG the policy needs to provide flexibility and take into account site specific circumstances.

To allow for flexibility, it is suggested that Policy 11 is amended as follows:

		<p><i>On schemes of 10 or more units or 0.5 hectares or more. (apart from exception sites as allowed by Policy 10 B), subject to viability considerations a minimum of 50% of homes must be affordable which will include:</i></p> <ul style="list-style-type: none"> <i>• 70% social or affordable rented accommodation, all of which is to be tenure blind and 'pepper potted' throughout the development; and</i> <i>• 30% intermediate or other affordable housing, for example shared ownership or shared equity, all of which is to be tenure blind and 'pepper potted' throughout the development.</i> <p>• Policy 15 – Park and Ride Generally supportive. A suitable park and ride scheme located within the outskirts of Sidmouth could be supported via contributions from the Bloor Homes proposals on land at Sidford High Street, Sidmouth and/or the provision of land and facilities as part of a wider mixed use development. Bloor Homes are willing to enter into discussions with Sidmouth Town Council regarding the possibility of bringing this forward.</p>