

SAVE OUR SIDMOUTH (SOS) – COMMENT ON EDDC TOPIC PAPER NO 3 –
EMPLOYMENT – JAN 2014.

1. Para. 6.18 of Topic Paper 3 refers to “modest” employment to meet “locally generated needs”. It is not agreed that 5.0 ha of employment land can be accurately described as modest when set in the overall context of proposed employment land provision throughout the District. Further, it is not agreed that the proposed scale of employment land provision is required to meet local needs. Evidence previously submitted on this matter by SOS and others appears to have been consistently ignored by EDDC.
2. Para. 6.19 misrepresents the Tym study’s description of existing employment accommodation. Whilst the Alexandria site was described as of a poor standard, this description was not applied to other existing employment accommodation within the town. It is not agreed that the Tym study identified only 0.15ha of developable land at the site. Figures in the Tym study range from 0.59 to 0.99ha. The figure of £1 million to improve access by Devon County Council has not been subject to examination and is not agreed. It is noted that no viability assessment has been undertaken. The conclusion that there is little chance of delivering an economically viable scheme is therefore without any evidential basis.
3. Para. 6.20, and subsequent analysis fails to recognise previously submitted evidence that, at present, there is a net surplus of in-commuting into Sidmouth, which is accommodated by existing employment land provision.
4. Para.6.21 fails to identify or take into account existing availability of underutilised and vacant employment land in the area.

5. The conclusion drawn in Para.6.22 fails to take into consideration a disaggregated approach to alternative employment land provision within the Built Up Area Boundary (BUAB).
6. It is unclear what evidence is being referred to in Para. 6.25. The topic paper itself presents no new evidence. The houses which are being built and the proposal housing allocation for Sidmouth is very modest for the size of the town. The scale of employment land provision proposed is disproportionate to the level of housing proposed, and fails to take any account of the demographics of the population of Sidmouth.
7. Whilst it is noted in Para. 6.26 that the plan does not propose any housing allocations that go outside the current BUAB, no consideration appears to have been given to mixed-use housing provision, live-work units or home working within the BUAB. The evidence base for EDDC to conclude that it is “not felt possible to meet employment needs” without incursion into the AONB remains unclear, and in any event fails to satisfy the policy test as set out in the second bullet point of Para.116 of the NPPF.
8. The “do nothing” option in respect of employment land provision alluded to in Para. 6.26 has not been subject to Sustainability Appraisal, and the conclusions drawn that this would lead to out-commuting and consequential adverse impacts on the AONB are wholly unsupported by any evidence. There is clear tension between this position adopted by EDDC and the proposed reallocation of The Knowle employment site for residential purposes.
9. Para. 6.28 asserts that the allocation of the Sidford site is warranted as an exceptional case, implying that the policy tests in Para.116 of the NPPF have

been met. It remains unclear why, if that is the case, the site continues to be regarded by EDDC as a non-strategic site allocation. If exceptional circumstances are established and development demonstrated to be in the public interest, and national considerations in terms of need have been taken into account, a strategic allocation would be warranted.

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