

Sidmouth Town Council 1st March 2021

New East Devon Local Plan (2021 – 2040)

Introduction

A draft of this report was considered by the Planning Committee on 17th February. The Committee made a number of observations which have been incorporated in the report which is now submitted to the Town Council for approval. This report, subject to any further amendments at the Council meeting, will be submitted, along with the views of the Environment Committee, to East Devon District Council.

The District Council have explained that a new version of the Local Plan is required because the existing document was prepared more than 5 years ago in accordance with the then current National Planning Policy Framework (NPPF) which was revised in 2019. Also, there is now a need to review the development framework across the District following the District Council's decision to withdraw from the Greater Exeter Strategic Plan.

The Planning Department hope to issue a draft local plan for public consultation in 2022 and to adopt the new plan by 2024. To begin public involvement, they have published an **Issues and Options Report** <https://storymaps.arcgis.com/stories/2c878e2028554dd4b5508cbe335fda1a> and have asked for observations by 15th March 2021.

An on-line form is available which poses a number of District-wide questions and options which Members are invited to complete as individuals. So far as **Sidmouth** is concerned, the approach adopted by the Planning Committee is that, whilst not ignoring the wider strategic needs of East Devon, we should look at the proposed objectives of the Local Plan and concentrate on the concerns and aspirations of our hometown.

In that regard we are extremely fortunate because we already have the Sid Valley Neighbourhood Plan. This contains a number of policies and community actions which Sidmouth Town Council adopted following extensive research, public engagement and, finally, recent approval by the Public. Our response to the proposed new Local Plan is largely based on the Sid Valley Neighbourhood Plan and East Devon District Council are asked to draw on this in preparing proposals for Sidmouth in the new Local Plan. A link to the documents is included at the end of this report.

The Issues and Options Report proposes the following objectives for the new Local Plan:

1. Designing for health and well-being. To encourage healthy lifestyles and living environments for all East Devon residents.

We strongly support this objective. It's a theme which should run like a golden thread throughout the Local Plan and every policy should be tested to see if it accords this objective.

It's important to recognise that health and well-being includes mental health, that younger people should not be overlooked, nor should people of all ages who can suffer from loneliness and depression. Also, that as well as any positive proposals (provision of play areas, planting etc) the negative effects have to be considered (the strain on community services from additional housing etc).

Furthermore, we recognise the importance not only of the obvious examples like doctors' surgeries but that Community Halls, Churches, Pubs, Youth Clubs etc all have their important part to play and policies should seek to protect them.

2. Tackling the climate emergency. To ensure all new development moves the district towards delivering net-zero carbon emissions by 2040 and that we adapt to the impacts of climate change.

We support this as an objective. There is a role to play for Building Regulations and we would encourage the District Council to ensure that plans for all new dwellings include solar panels etc. Furthermore, the Sid Valley Neighbourhood Plan recognises that there is also a place for appropriate small scale renewable energy development. There are, however, a number of important pre-conditions set out in the Plan. We would not wish to see the development of large onshore renewable energy development because of the effect on the AONB landscape and tourism. Similarly, the coast and seascape must be protected so any offshore energy infrastructure should be positioned to minimise visual impact from the East Devon coast. An offshore wind farm, visible from the coast, would be highly unacceptable.

The Local Plan should also recognise the need for mitigation of the effect of climate change eg. a sensitively designed sea wall in Sidmouth.

3. Meeting future housing needs. To provide high quality new homes to meet people's needs.

We do not wish to see any extension of the Built-Up Area Boundary (BUAB). Sidmouth's situation, surrounded by open countryside, is part of its great attraction.

We do not foresee any problem in Sidmouth in meeting the housing requirement in the existing local plan of 150 dwellings. Indeed, much of the allocation has already been completed. However, the most significant shortfall in the Sid Valley is affordable housing for young people and this represents the priority area to be addressed.

There is limited potential for new residential development within the BUAB because of the tight constraint of the boundary. Where development is proposed it should not be in such numbers as to overwhelm the existing built environment, infrastructure and services. Nor should it damage access to, or the amenity of, the open countryside of such areas as The Byes and the East Devon AONB. It must include a proportion of affordable housing as detailed in the Sid Valley Neighbourhood Plan.

If, however, the local or national pressure to allocate additional land for housing proves irresistible, then the only possible site appears to be the land adjoining the B3176 Bulverton Road to the North of Higher Woolbrook Park. This should be combined with a park and ride scheme into the town. Again, it is essential that any new development must include at least 50% affordable housing in accordance with the Sid Valley Neighbourhood Plan.

Outside, but immediately adjacent to the boundary, we would be prepared to accept small development(s) of "Exception sites". These should not be specifically allocated. There should be strict criteria before any applications are approved and strict control involving a test of "local connection" regarding the occupants.

There is a noticeable number of second homes in Sidmouth. We strongly suggest that an analysis be carried out and that this is a topic which should be addressed in the new Local Plan.

4. Supporting jobs and the economy. To support business investment and job creation opportunities within East Devon and support a resilient economy.

Sidmouth has been blessed, whether we wanted it or not, with a prospective business park at Two Bridges, Sidford which Sidmouth Town Council have consistently opposed. At the present time this development has not been implemented. If this remains the case, we would urge that the site be removed from the Local Plan including the so-called phase 2 which was intended to be developed only if and when the first phase was occupied.

We would resist the allocation of additional land within our town, although we would strongly support the improvement of the Alexandra Industrial Estate and a new access onto the B3176 Bulverton Road.

From an East Devon strategic point of view, we would see wish to see the majority of employment development within the East of Exeter Economic Area.

Particularly at the present time, we see the virtue (and necessity) of home working and in accordance with the Sid Valley Neighbourhood Plan would commend a policy to support home-working provided it does not impinge on the neighbourhood.

5.Promoting vibrant town centres. To promote the vitality of our town centres, encourage investment, greater flexibility and a wider range of activities to increase footfall and spend.

We consider that this is an important objective because of the knock-on benefits to a sense of well-being, tourism, the local economy and hence the vitality of the town. It was particularly gratifying to see a picture of Old Fore Street, Sidmouth used in the consultation document as an example of a vibrant Town Centre. However, there is huge scope to go further in terms of pedestrianisation and enhancement (planting, seating etc) and we would urge the adoption of suitable policies not just in Sidmouth but throughout towns and even villages in East Devon.

We are aware of the number of charity shops in Sidmouth and prefer to see a shop occupied by a charity than empty. Our Planning Committee have, in the past, supported several planning applications to convert retail to domestic use where it is clear that the building has no realistic future as retail in order to support life in the town. Whilst this may not be a matter for the Local Plan, the Council would like Charity Shops to be looked at, particularly with regard to business rates, in the interest of levelling the playing field with other traders.

We would welcome much clearer plans in the new Local Plan than those which currently exist showing particular designated areas within the towns including Conservation Areas and Areas of Special Control of Advertisements and an explanation of the implications so that all is clear.

6. Designing beautiful and healthy spaces and buildings. To promote high quality beautiful development that is designed and constructed to meet 21st century needs.

We would commend the approach adopted in the Sid Valley Neighbourhood Plan of including a policy, not only that buildings should be well designed but should not adversely impact on neighbours. Also, we consider that Local Distinctiveness is important and should be supported by policies.

We are also concerned about light pollution, not least because of the Norman Lockyer Observatory, and would recommend a similar policy in the Local Plan.

7. Our outstanding built heritage. To conserve and enhance our outstanding built heritage.

East Devon, including Sidmouth in particular, is highly dependent on tourism which itself depends on our historic buildings as well as our outstanding natural environment (see below) and we would fully support appropriate policies.

8. Our outstanding natural environment. To protect and enhance our natural environment and support an increase in biodiversity.

Two policies in the Sid Valley Neighbourhood Plan relate to the designation of Green Corridors and Local Green Spaces. These policies seek to protect the environment as well as encourage diversity. We would recommend that the Local Plan either includes specific designations or specific support for their designation across East Devon. Also, a policy to support the designation of protected views.

9. Promoting sustainable transport. To prioritise walking, cycling and public transport and make provision for charging electric vehicles, whilst reducing reliance on fossil fuelled vehicles.

We support this objective and recommend a policy, in accordance with the Sid Valley Neighbourhood Plan, that new developments should be designed to incorporate shared use paths and through routes (not paths) for pedestrians and cyclists.

We would also wish the new Local Plan to include support in principle for a park and ride scheme on the outskirts of Sidmouth provided certain criteria are met.

We support the provision of affordable bus services.

10. Connections and infrastructure. To secure infrastructure needs at an appropriate time to support new development.

We are not sure quite what this objective means. If it means seeking improvements in eg rail link and road links, broadband speeds etc then we would support. Similarly, a policy to require developers to contribute to any new infrastructure which their development requires.

Notes:

1. When the consultation documents were considered by Sidmouth Town Council on 1st March, Members were extremely critical of the District Council's consultation exercise. The time-scale was considered to be absurdly tight by both Members and Officers and the nature of the consultation, in terms of a multi-choice questionnaire and question boxes, was not conducive to a meaningful engagement with the public and completely inappropriate for a democratic response from town and parish councils. The approach therefore adopted by Sidmouth Town Council is to respond as best we can within the deadline by generally supporting the proposed objectives and citing policies we would wish to see included in the new Local Plan.

2. Our response is largely drawn from the Sid Valley Neighbourhood Plan which was recently approved following extensive consultation. Where a Neighbourhood Plan, such as ours, is in existence, the Local Planning Authority has a duty to have regard to it in preparing a new Local Plan.

3. The Council will, of course, continue to engage in the process of preparing the new Local Plan, including any focus groups and webinars, and will send further submissions at the appropriate time. We would particularly request that Sidmouth Town Council be consulted on any proposed land allocations in order that we can have an opportunity to respond.

4. A link follows to the documents associated with the Sid Valley Neighbourhood Plan and Community Actions:

[Sid Valley Neighbourhood Plan](#)

[Sid Valley Place Analysis](#)

[Sid Valley Basic Conditions Statement](#)

[Sid Valley HRA SEA Screening Report](#)

[Sid Valley Consultation Statement](#)

[Community Actions appendix to the plan](#)