Local Plan - Issues and Options

– final submission from the Vision Group for Sidmouth

– 15 March 2021

References to Sid Valley Neighbourhood Plan policies

East Devon Local Plan 2021 to 2040 Issues and Options consultation - January to March 2021

This pdf accompanies the full submission of the VGS to the Local Plan's 'Issues and Options' consultation and contains full references to the Sid Valley Neighbourhood Plan and its list of Community Actions.

The SVNP can be found at: https://eastdevon.gov.uk/media/3454115/svnp-adopted-version.pdf

The list of CAs: https://eastdevon.gov.uk/media/3113624/community-actions-july-2019.pdf

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Chapter 2: Objectives

Question 1

1) Agriculture:

Policy 19: "Renewable energy and green employment initiatives will be supported ... provided that any such initiatives ... Would not result in irreversible loss of the best and most versatile agricultural land."

2) Young people/future generations:

NP Vision: "Our vision is of a Sid Valley that maintains and promotes its rural and coastal beauty and welcoming community and advances its appeal to young and old through providing a diverse economy to support a high quality of life, work and visitor experience.... To realise our vision, our Neighbourhood Plan encourages changes which benefit our community; children and young people and families and older people and the economy."

NP Context: "To meet the needs of our community the Sid Valley requires carefully balanced development providing suitable and affordable housing for residents both young and old."

NP Methodology: "A key principle of the Steering Group approach was to ensure involvement from as wide a range of the community as possible. Particular emphasis was placed on engaging children and young people to have their say. This was achieved through the establishment of a Children and Young People's Advisory Group who worked with us to design the Children and Young People's Questionnaire."

Rationale (Community & Culture): "The SVNP through its policies and community actions, encourage mechanisms that promote community ownership by making local decisions, strategies, projects and plans, particularly for young people in the area."

Question 3 - Neighbourhood Plans and the new Local Plan

Recent government guidance considers the relationship between the LP and NPs

"What is the relationship between the local plan and neighbourhood plans?

"Neighbourhood plans, when brought into force, become part of the statutory development

plan for the area that they cover.

"They can be developed before, after or in parallel with a local plan, but the law requires that they must be in general conformity with the strategic policies in the adopted local plan for the area (and any other strategic policies that form part of the statutory development plan where relevant, such as the London Plan). Neighbourhood plans are not tested against the policies in an emerging local plan although the reasoning and evidence informing the local plan process may be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested.

"There are requirements for a local planning authority to support neighbourhood planning. Further detail is provided in the neighbourhood planning guidance.

"Where a neighbourhood plan is brought forward before an up-to-date local plan is in place the local planning authority should take a proactive and pcositive approach, working collaboratively with a qualifying body. This could include sharing evidence and seeking to resolve any issues to ensure the draft neighbourhood plan has the greatest chance of success at independent examination.

"Where a neighbourhood plan has been brought into force, the local planning authority should take its policies and proposals into account when preparing the local plan. Local plan policies should not duplicate those in the neighbourhood plan, and do not need to supersede them unless changed circumstances justify this. It is important for local plans to make appropriate reference to neighbourhood plan policies and proposals, and similarly for neighbourhood plans to acknowledge local plan policies that they relate to."

Paragraph: 006 Reference ID: 61-006-20190723

Revision date: 23 07 2019

https://www.gov.uk/guidance/plan-making

Chapter 3: Health and Well-being

Question 4 - Planning for health and wellbeing

Policy 1: (Built & Natural Environment) Aim 4: "Protect open spaces such as parks... for their life enhancing recreational, health and wellbeing value and the opportunity they afford for open-air activities."

Policy 5: (Built & Natural Environment) Justification: "They provide spaces which... support community cohesion and positive mental health and wellbeing."

Policy 12: (Housing) Justification quotes NPPF: "supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural wellbeing."

Policies 14 & 15 (Access & Connectivity) Introduction: "The SVNP aims to provide a variety of travel choices, for the benefit of health, the natural environment and air quality."

Policies 20 & 21 (Community & Culture) Rationale: "Opportunities for sports and recreation as outlined in NPPF paragraph 73 can make an important contribution to the health and wellbeing of the community."

Chapter 4 - Climate emergency

Question 5 - Energy efficiency of new buildings

Policy 1 (Built & Natural Environment) Aim 8: "Address climate change issues: its effect on nature in the Valley must be considered for example regarding carbon emissions, flooding, re-use of buildings and other sustainability issues."

Community Action: BN01 Energy Efficiency: All new buildings apart from residential development should demonstrate the sustainability performance as laid out in the EDLP.

Question 6 - Provision of solar arrays/farms and windfarms

Policy 16 (Economic Resilience) Aim 6: "Self Sufficiency: Encourage and support generation of renewable energy resources; continue to develop our status as a Transition Town."

Policy 19 (Renewable Energy and Low Carbon Energy Projects): " Renewable energy and green employment initiatives will be supported and encouraged. The provision of medium scale renewable energy projects within the SVNP area or associated schemes for renewable energy facilities will be supported subject to the requirements in the Local Plan, compliance with any relevant policies in this Neighbourhood Plan – and provided that any such initiatives..."

Question 7 - Carbon saving measures

Policy 1 (Built & Natural Environment) Aim 8: "Address climate change issues: its effect on nature in the Valley must be considered for example regarding carbon emissions, flooding, re-use of buildings and other sustainability issues."

Chapter 5: Housing

Question 8 - How many new homes should we plan for each year?

Policies 9 and 10 (Housing) Rationale and Overarching Aims: "The East Devon Local Plan currently sets a target of 150 units to be built in Sidmouth up to 2031. Planning permission has already been granted for just over that number, in part because 113 units have been approved at The Knowle. However, these units do not meet the housing needs of the younger people living in the town, which the public have said they want the plan to address."

Question 9 - Sites for small scale housing developments

Policies 9 and 10 (Housing): "Planning policy recognises that in some situations, residential developments can be allowed in exceptional circumstances, outside of the built-up area boundaries in rural areas to reflect and respond to local housing needs particularly for affordable housing. These are generally known as "exception sites" and the NPPF allows for "the possibility of incorporating some market housing on the sites to facilitate the provision of significant additional affordable housing to meet local needs.."

Policy 9 (Residential Development): "Outside of the BUAB there will be a general presumption against new residential development apart from replacement dwellings, new houses required for employed persons in rural businesses, or through the conversion of redundant or disused buildings or as allowed under Policy 10."

Policy 9 and 10 (Housing) Justifications: "In the replies to the Second Household Survey

as to where any building outside the BUAB should take place, only a very small proportion of respondents identified any such sites. In fact, the most popular response to this question was that any new housing should be in 'brownfield sites', within the BUAB."

Policy 10 (Exception Sites): "Exception site residential development of land which lies immediately adjacent to the built-up area boundary and is well related to the pattern of adjacent developments in the vicinity will be allowed if it complies with the requirements of this policy and provides for no more than 15 dwellings at any one site.

"Exception site developments will be required to include at least 66% affordable housing and all the housing whether market or affordable must be of a type and size required to meet local housing need as set out in SVNP Housing Policy 12. Affordable housing must be accompanied by a Planning Obligation requiring that occupants meet the local connection criteria set out in SVNP Housing Policy 13.."

"Such development will only be allowed where it is demonstrated that the development will not detrimentally impact on the setting of the town or the landscape quality of the AONB and it meets all other relevant policies in the development plan. Its design and layout will be expected to follow the characteristics of the adjacent Character areas, as set out in the Place Analysis. "

Policy 11 (Affordable Housing within the BUAB): "On schemes of 10 or more units or 0.5 hectares or more. (apart from exception sites as allowed by Policy 10) a minimum of 50% of homes must be affordable ... On sites in the AONB schemes of between 6 and 9 units a financial contribution equivalent to a 50% site affordable housing provision will be expected to be made in lieu of on-site provision of affordable housing."

Question 10 - Planning for housing for people at all stages of their life

Policies 9 and 10 (Housing) Rationale and Overarching Aims: "Questionnaire responses show that residents want to encourage a more balanced age profile in the town."

Policy 11 (Affordable Housing within the BOUB): "To meet the needs of our community the Sid Valley requires carefully balanced development providing suitable affordable housing for residents both young and old." (1.1.0 The Sid Valley Neighbourhood Plan Vision: 1.1.1 The Context for Our Vision)

Policy 12 (Housing): Sid Valley Place Analysis: "The built environment can better meet multi-generational community needs by providing a mix of housing tenure types including "lifetime homes" and "self-build." (2.2.0 THEME: Our Built Environment)

Policy 12 (Housing): Housing Needs Survey: The HNS indicates that there is a higher need for 2-bedroom units to create a better choice of housing and to address the increasing need for smaller properties due to demographic and household formation change. It is therefore a requirement that the mix of housing will be 60% one or two bedrooms and 40% three/four bedrooms in the market sector to provide a better-balanced housing stock.

Policy 12 (Housing by number of bedrooms): "The requirement for property size in the intermediate housing market is mainly one and two-bedroom units to meet the needs of concealed households and those who are unable to access the market sector as a first-time buyer. There is a small level need for some three-bedroom units from existing households often due to relationship breakdown. A property size target of 50% one bedroom, 40% two bedroom and 10% for three-bedroom units should be set to meet the requirements of households in this sector. (Second Household Survey: Q34)"

Question 11: Additional housing policy objectives

Community Action HO 01 Self-build homes will be supported, especially when locally-tied

and affordable

Community Action HO 02 The use of locally sourced materials will be encouraged where possible

Community Action HO 03 Community-led housing projects will be encouraged

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Jobs and Economy

Question 12 - Preference for location for future job provision

Policy 16 (Economic Resilience) Aim 3: "Inward Investment: Promote our strong work-life balance to attract entrepreneurs and families; support applications enabling home-working"

Policy 17 (Facilitation of Home Working): "Proposals for house extensions and/or conversions of existing domestic buildings and new garden buildings for home-working will be supported provided that the following conditions are met in full..."

Policy 17 (Facilitation of Home Working): Sid Valley Place Analysis: Economic Resilience: "new mixed development should... consider the values of homeworking to the economic vibrancy of the Sid Valley, support places where networking can be encouraged, particularly for semi-retired, voluntary and professional people who work from home" Economic Resilience 8.0

Question 13 - Differing jobs sectors in East Devon

Policies 16 – 19 (Economic Resilience) Aims:
1. Visitor Economy: Maintain and develop a competitive position as a year-round destination for visitors from the UK and abroad; support and promote existing and new festival events.
2. Retail: Preserve and promote our distinctive shopping environment
3. Inward Investment: Promote our strong work-life balance to attract entrepreneurs and families; support applications enabling home-working
4. Business Infrastructure: Encourage and support development of existing land allocated for business use, with emphasis on small-scale units offering flexible space for start-ups, skilled/higher-wage/internet age small businesses.
5. Employment: Encourage and support business diversification to provide attractive careers and job options for people of working age, including school leavers.
6. Self Sufficiency: Encourage and support generation of renewable energy resources; continue to develop our status as a Transition Town.

Community Action ER02: Activities in support of the development and diversification of our tourist offer. • Build on the year-round tourism/culture/education offer with festivals e.g. science, walking, literary, Sea Fest etc. Develop a cultural 'festival' identity. • Create and promote a distinctive brand identity for the town, villages and countryside of the Sid Valley.

Community Action ER03: Activities in support of the development and diversification of the residential profile and expansion of employment • Promote the Sid Valley as a multigenerational community and thriving area in which to live and work and an area which encourages and supports enterprise, innovation and new ideas, hubs, shared space and resources. • Encourage businesses which provide 'interesting jobs'

Question 14 - Additional economic policy objectives

Policy 18 (Employment Land): Change of use of properties used for employment purposes and premises allocated for business in the Local Plan, such as the Alexandria Road Industrial Estate will not be approved unless the new use provides or creates employment, except
a) where no occupier has been found for vacant premises which have been marketed for at least 12 months for its current use or similar uses and without success, and conforms with EDDC's conditions of use guidance (http://eastdevon.gov.uk/planning/planning-services/planning-developmentmanagement/viability-guidance-notes/marketing-strategy-statementguidance/)
b) it excludes change of use to retail, unless required for ancillary use to serve the business needs of the community, or residential uses, even where these provide or create employment
c) where the land is allocated for residential development in the Local Plan

Community Action ER01: Activities which make maximum use of land resources

Community Action ER02: Activities in support of the development and diversification of our tourist offer.

Community Action ER03: Activities in support of the development and diversification of the residential profile and expansion of employment

Community Action ER04: Support existing businesses and institutions

Community Action ER05: Support, foster and develop our entrepreneurial culture

Community Action ER06: Support, foster and continue to develop our status as a Transition Town • Encourage measures which contribute to a self-sufficient and self-sustaining economy. • Encourage projects which support a Green transport environment favouring electric-powered vehicles. • Encourage 'relocalisation' of business through, for example encouraging contractors on public works to source locally'; encouraging community and social enterprises.

Chapter 7: Town Centres

Question 15 - Town centre uses

Community Action ER04: Support existing businesses and institutions • Encourage and support existing and new social enterprises for the benefit of the community. • Resist out of town developments which would result in loss of footfall and trade in town centres.

Question 16 - Additional town centre policy objectives

Policy 15 (Shared Use Paths): Sid Valley Consultation: 78% support pedestrians and cyclists being given greater priority in the town centre (Second Household Survey: Q16, 27, 47)

Policy 16 (New Retail and Commercial Development): "Proposals for new retail and commercial facilities, extensions and/or alterations to existing facilities will be supported on sites within the Town Centre provided they meet the following criteria..."

Policy 21 (Access & Connectivity) Introduction: "There is considerable support amongst the community for the creation of an integrated traffic management system to provide a range of transport and route choices, alleviate reliance on narrow streets and pavements, and allow freer, safer movement in the town centre, supporting the health and wellbeing of the community and enabling the economy to thrive."

Policy 23 (Eastern Town Access): "Any development of Eastern Town will be expected to demonstrate via an access strategy how the scheme will maintain, and where possible improve the cycle pathway linkages with the town centre and the wider area. The existing levels of car parking spaces will be retained unless alternative parking is provided which is equally accessible to the town centre. The development will be expected to provide high quality environmental and public realm enhancements to the immediate area."

Policy 24 (Eastern Town Maritime Heritage): Sid Valley Place Analysis : "Improvements at Port Royal Eastern Town, town centre and esplanade will benefit economic resilience and the community by taking account of our maritime location and history, especially for visitors. Use Port Royal as a gateway to seafront." (Place Analysis 2.7.0 cont. Page 10)

Chapter 8: Design

Question 17 - Designing beautiful spaces and buildings

The Sid Valley NP's Place Analysis acts as a design code:
https://eastdevon.gov.uk/media/3146552/2018-sid-valley-place-analysis_fdii.pdf

Question 18 - Additional design policy objectives

Policy 7 (Local Distinctiveness): "Development proposals will be expected to have regard to the character of the immediate area as set out in the Place Analysis.

"All new development, including innovative designs, should be designed to complement and enhance the local distinctiveness of the character of its immediate locality, reflecting the height, scale, massing, fenestration, materials, landscaping and density of buildings as described in the Place Analysis.

"Building heights should be in keeping with the context of neighbouring properties."

Policy 7 (Local Distinctiveness): Policy Justification: Sid Valley Consultation: "In the First Household Survey over half the replies identified the design, size and location of new housing as one of their top three priorities for the Neighbourhood Plan.

"Nearly all respondents (98%) were adamant that "the historic appearance & local distinctiveness of Sidmouth & the Sid Valley" should be retained. (Second Household Survey Q8) Almost all respondents (92%) felt that "the Neighbourhood Plan should produce local design guidance for all future developments." (Second Household Survey Q9)"

Policy 21 (A Safe Town): "Proposals for new developments should consider the 'Secured by Design' principles and incorporate them where possible. Development proposals aimed at improving community safety which comply with other policy in the development plan will be supported."

Chapter 9: Built heritage

Question 19 - The importance of conserving and enhancing heritage assets

Policies 1 – 8 (Built & Natural Environment) Aims: "Development is supported that incorporates sustainable objectives which enhance the existing built environment throughout the Sid Valley, protect the Valley's historic streets and heritage buildings and improve or enhance public spaces and other townscape assets."

Policies 1 – 8 (Built & Natural Environment) Aim 6: "Encourage local distinctiveness: the

different character areas of the Valley should be respected, the Conservation Areas and historic assets protected, and street scenes varied to avoid repetition."

Policy 21 (Eastern Town) Aim 1: "Any development should reflect the river estuary ambience and the maritime heritage."

Chapter 10: Natural Environment

Question 20 - Development in protected landscapes

Policies 1 – 8 (Built & Natural Environment) Aims: "The Sid Valley community expect effective control of the AONB and Coastal Preservation Area. In particular, that settlement boundaries are maintained, to stop unnecessary encroachment from development. The AONB and CPA are protected because they are high quality landscape designations intended to protect the landscape/countryside. Development is supported that incorporates sustainable objectives which enhance the existing built environment throughout the Sid Valley, protect the Valley's historic streets and heritage buildings and improve or enhance public spaces and other townscape assets.

Policies 1 – 8 (Built & Natural Environment) Aim 3: "Protect the open countryside, Built-up Area Boundaries should be complied with (other than in the case of exception sites), and AONB's, CPA's and green wedges between settlements should be protected."

Policy 2 (Protection of Key Views): "Any development must not cause a significant adverse impact on the current valued views as shown in the Key Views Map 8. The visual relationship of settlements in the valley surrounded by hills should be protected. Except when development will not be visible from the viewpoints, proposals outside of the BUAB must demonstrate that they will have a low or negligible impact on the views, assessing…"

Policy 3 (Settlement Coalescence): "Any development proposal within the Sidford-Sidbury Non- Coalescence Area shown on Map 9 will only be acceptable if it does not impact on the visual and physical separation of Sidford and Sidbury."

Policy 3 (Settlement Coalescence): Policy justification: Sid Valley Consultation: „Evidence from public engagement is that the residents place great importance on maintaining an undeveloped gap between Sidford and Sidbury especially if the Strategic Employment Area is developed. This area is not developed and it is important that this vulnerable gap remains open to maintain the separation between the two settlements."

Sid Valley Place Analysis: "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 washes over the smaller settlements in the NP area and directly abuts the 'Built Up Area' boundary of Sidmouth" (3.1.0 Wider landscape CONTEXT AND AONB);

Question 22 - Additional natural environment policy objectives

Policies 1 – 8 (Built & Natural Environment) Aim 5: "Maintain the valley's tree canopy for current and future generations."

Policy 4 (green Corridors): "The Environment Agency Flood Zone 3 of the River Sid and tributaries; the Glen Goyle and Woolbrook Stream in the Neighbourhood Area are defined as Green Corridors as shown on Map 10, 11 and 12. Development within the Green Corridors will be required to maintain and where possible enhance the biodiversity of the corridor and allow uninterrupted passage of wildlife."

Policy 5 (Local Green Space Designation): "The following areas are designated as Local

Green Space as shown on the Sidmouth LGS Designation Maps (Maps 13-21) below, where there will be a general presumption against all development that does not promote the attributes and use for which it was designated except in very special circumstances."

Policy 6 (Infill Development, Extensions and Trees): "Development should be designed so as not to adversely impact on the amenities of its neighbours and should seek to protect any existing trees that contribute to the overall amenity of the area, as well as being appropriately landscaped."

Policy 6 (Infill Development, Extensions and Trees): Policy Justification: Sid Valley Consultation: "Responses to questions about the Built Environment clearly indicate that residents' value the character of the towns and villages of the Sid Valley. (Second Household Survey: Q2 and Q8) Specifically regarding protecting trees, 87% of respondents stated that "all trees cut down in the process of development should be replaced by the developer." (Second Household Survey: Question 17)

"Tree and native hedges ... highlighted as important to preserve the Natural Environment". (Business & Special Interest Groups Survey p14 Climate Change)

Community Action BN02 Biodiversity: To create and implement a Biodiversity Action Plan for the Sid Valley.

Community Action BN03 Maintain the Tree Canopy: To maintain and expand the Sid Valley's tree canopy by raising awareness of its importance and by initiating and managing tree planting programmes.

Chapter 11 – Transport

Question 23 - Promoting accessibility by walking and cycling

Policy 15 (Shared Use Paths): "Where possible, any new housing developments shall be designed to incorporate shared use paths for pedestrians and cyclists. Where appropriate these shared use paths should link with existing shared use paths or pavements, dependent on highway standards."

Policy 15 (Shared Use Paths): Sid Valley Consultation: 80% of respondents support improved cycleways linking Port Royal and the Byes. 92% of respondents support the creation of paths on all new housing development for pedestrians, cyclists and mobility scooters to link with existing paths in the Sid Valley. 78% support pedestrians and cyclists being given greater priority in the town centre (Second Household Survey: Q16, 27, 47)

Question 24 - Additional sustainable transport policy objectives

Community Action AC02 Town Centre - Encourage greater priority to be given to pedestrians and cyclists in parts of the town centre to improve safety and enjoyment of the town.

Community Action AC03 Sidbury to Sidford Pathway - Give support to a shared pathway for pedestrians and cyclists from Sidbury to Sidford, which will cross the tiger crossing in Sidford and link with the Byes.

Community Action AC04 Byes to Port Royal Pathway - Development of a 'green corridor' and improved cycle pathways following the River Sid between the Byes and Port Royal.

Chapter 12: Infrastructure/Facilities

Question 25 - Facilities and services that are important

Policy 20 (Community & Culture) Rationale: "The SVNP supports and guides the protection, retention and enhancement of all current community facilities. National Planning Policy supports the retention and development of local facilities and community services in towns, including sports venues" (para 28,70 NPPF).

Policy 20 (Community & Culture) Aim 1: "To enhance and protect all recreational facilities and community buildings of value to both residents and visitors. To maintain, promote and support the continued services for the pastoral, educational, health and care needs of the entire community."

Policy 20 (Community & Culture) Aim 3: "That the Community Facilities and Assets as detailed in the Community Assets below continue to be provided and their pivotal role in providing physical spaces in which community cohesion, activity and support can take place, respected. "

Policy 20 (Protection and Enhancement of Community Facilities and Assets): "Proposals that would result in the loss of the following community facilities will not be permitted unless their loss will not have an adverse impact on the special character of the area's natural and built environment and any Assets of Community Value..."

Policy 20 (Protection and Enhancement of Community Facilities and Assets): Policy Justification: "The community place great importance on retaining its valued community facilities, which can vary dependent upon the role of the asset in the local community, whether it be the local pub or the village shop or a community hall in the town."

Policy 20 (Protection and Enhancement of Community Facilities and Assets): quotes from NPPF 2012: "To deliver the social, recreational and cultural facilities and services the community needs, planning policies and decisions should plan positively for the provision and use of shared space, community facilities (such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments and guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs" (NPPF: para, 28, 70,73, 74) = NPPF 2018 Paras 83, 92 and 96 and 97

Question 26 - Additional infrastructure and service provision policy objectives

Policy 8 (Light Pollution): "There will be a general presumption against all outdoor lighting (both ambient and floodlight) outside the BUAB unless there is an overwhelming operational requirement and the illumination has been designed to minimise light spillage and the hours of usage are restricted by planning condition."

Policy 11 (Affordable Housing within the BUAB): Sid Valley Place Analysis: "The built environment can better meet multi-generational community needs by; getting the infrastructure right, by balancing transport needs and affordable housing." (2.2.0 THEME: Our Built Environment)

Policy 22 (Eastern Town Redevelopment): "The highest number of responders wanted a "friendly and safe place to visit and live" and talked about the importance of protecting the coastline and beaches from high tides and flooding and concern about perceived lack of action about Climate Change (First Residents Survey: Q20 p15 & p18)"

Policy 22 (Eastern Town Redevelopment): NPPF Design Guidance para 032 Master Planning "Local Plans should take account of climate change over the longer term,

including factors such as flood risk, coastal change, water supply and changes to biodiversity and landscape. New development should be planned to avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure." (para 99)
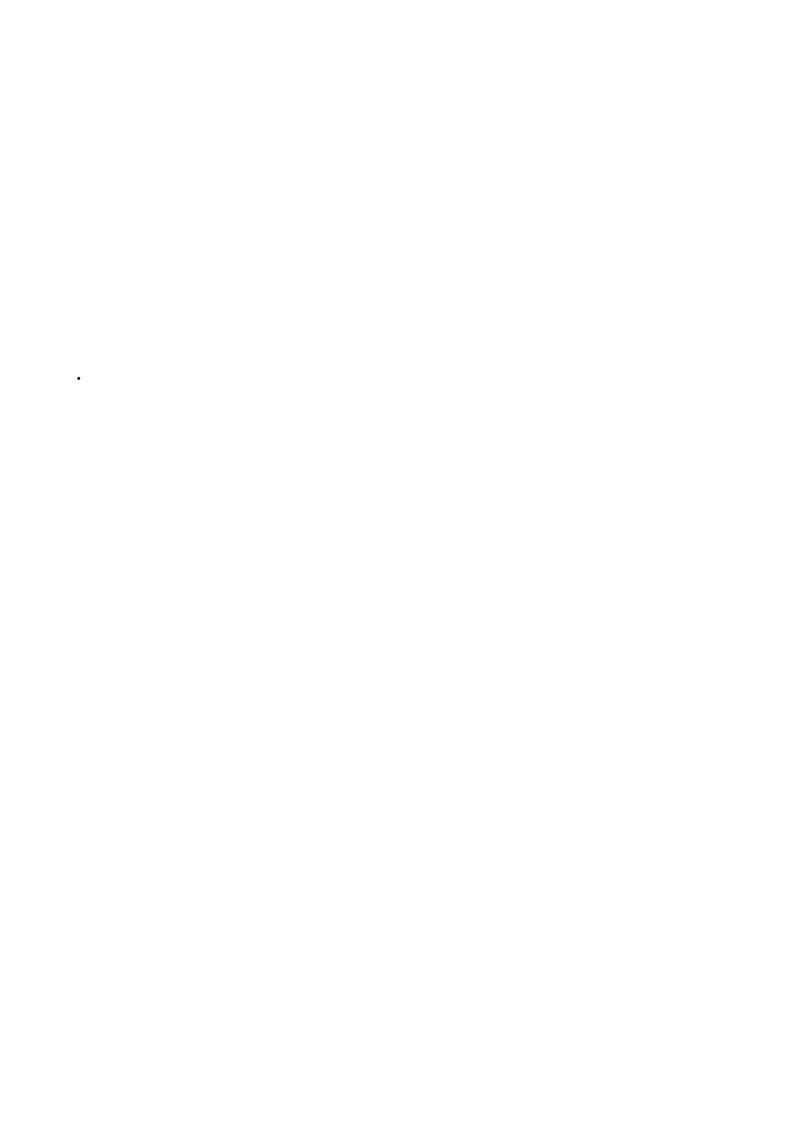

Chapter 12: Development Strategy

Question 29 - Future options for the type and location of development

Policy 6 (Infill Development, Extensions and Trees): "Development should be designed so as not to adversely impact on the amenities of its neighbours."

Policy 9 and 10 (Housing)Rationale and Overarching Aims: "There are only limited opportunities for brownfield development within the town without encroaching on much valued local facilities which are to be protected by the plan's other policies."

Policy 9 and 10 (Housing) Justifications: Sid Valley Consultation: "In the replies to the Second Household Survey as to where any building outside the BUAB should take place, only a very small proportion of respondents identified any such sites. In fact, the most popular response to this question was that any new housing should be in "brownfield sites, within the BUAB."

Vision Group for Sidmouth – 15 March 2021

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Local Plan - Issues and Options

– final submission from the Vision Group for Sidmouth

– 15 March 2021

East Devon Local Plan 2021 to 2040 Issues and Options consultation - January to March 2021

This pdf is a copy of the online form completed at: https://eddc-self.achieveservice.com/service/East_Devon_Local_Plan_2021_to_2040?save_id=AF-Saved-e3156fdf-8407-4b46-9b20-2fc85147c69d

This includes references in the form of 'tiny url' addresses, which open up to the original links.

In addition, this pdf provides links to specific documents which might be of use.

This is accompanied by a second pdf "Local Plan - Issues and Options – final submission from the Vision Group for Sidmouth – March 2021 – References to Sid Valley Neighbourhood Plan policies"

Chapter 1: Your Details

Organisation name:

Vision Group for Sidmouth

In what capacity are you responding to this consultation - what most closely describes you or if you are an agent what best describes, in respect of this consultation, what your client does?*

Community or Resident group

Chapter 2: Objectives

Question 1

In paragraph 2.1 of the Issues and Options report we set out a series of suggested objectives for the future local plan that cover issues like climate change, meeting housing needs and supporting the economy. Question 1 seeks your views on these objectives.

Do you think these are the right objectives for the new local plan, are there any further objectives that you would wish to see added or amendments made?

Yes, these are the right objectives

COMMENT:

The VGS consider all the objectives to be 'right'; however, others could be added to the LP:

1) 'Agriculture' is only referred to as forming part of the 'traditional economy'; however, supporting an actively sustainable agricultural system should become a key objective, as outlined in the the government's recent 'Path to Sustainable Farming' which considers biodiversity, local food production and distribution, and support for small-scale traditional family farms: https://tinyurl.com/yrayctsf

doc: https://www.gov.uk/government/news/government-unveils-path-to-sustainable-farming-from-2021

2) 'Young people' are scarcely mentioned and 'future generations' only once; issues such as

'more housing' or 'climate change' only imply a concern with the next generation; rather, the interests of young people and real long-termism should be made a key objective, on the lines of the Well-being of Future Generations (Wales) Act 2015: https://tinyurl.com/6ar7m7cp

doc: https://www.futuregenerations.wales/wp-content/uploads/2017/02/150623-guide-to-the-fg-act-en.pdf

doc: https://www.legislation.gov.uk/anaw/2015/2/contents/enacted

Question 2 - The scope of the local plan

In paragraph 2.2 of the Issues and Options report we propose producing a single plan, but it would be possible to produce a series of plans to cover the different issues. Do you think we should?

Which option do you think we should take?

Option 2 - Multiple Plans. Produce a plan that deals with strategic matters (the bigger stuff) first and then subsequent plans that deal with more local concerns and detailed matters later

COMMENT:

Having one large plan covering all the items might not be the most useable format, whereas theme-based plans might be less weighty to use.

Question 3 - Neighbourhood Plans and the new Local Plan

Neighbourhood plans have been agreed for many of our neighbourhoods and more are in preparation. In paragraph 2.11 of the Issues and Options report we explain the role of neighbourhood and their relationship with the local plan.

How do you think we should make best use of existing neighbourhood plans to inform the new local plan that we are producing?

COMMENT:

We welcome the District Council's desire to make the process as bottom-up as possible, building on the wealth of guidance and input from local communities. We recommend that the LP should provide specific references to policy recommendations from individual NPs, citing continuing dialogue leading to consensus in the creation of a LP that demonstrably confirms, rejects, modifies or introduces policies derived from NPs.

Recent government guidance considers the relationship between the LP and NPs (Paragraph: 006 Reference ID: 61-006-20190723): https://tinyurl.com/79mbaps3

doc: https://www.gov.uk/guidance/plan-making

This submission from the VGS includes a pdf document which provides specific references to the Sid Valley NP's own policies: these both inform the VGS's own submissions and point to directions the East Devon LP could take.

Chapter 3: Health and Well-being

Question 4 - Planning for health and wellbeing

In Chapter 3 of the Issues and Options report we set out the health and wellbeing benefits of active lifestyles and the ways in which planning can promote this

How important do you think it is that we should actively promote health and wellbeing throughout our new local plan?

Absolutely essential

COMMENT:

It is through long-term planning that real, positive impacts on health and well-being can be realised.

- Urban green spaces: The concept of 'urban acupuncture' can help promote urban regeneration at a local level: "Pocket parks and community gardens are a relatively inexpensive investment in the urban environment... These interventions are proven to have significant benefits for the mental health of citizens." https://tinyurl.com/vxn4hc8k

- Biodiversity: EDDC's "Life on the Verge" project is to be welcomed, as through a new appreciation of "the benefits of biodiversity for nature and our mental health, people are coming around strongly to the idea that 'messy is good'". https://tinyurl.com/3zwp5fw9

- Built heritage: A recent study finds that historic places, assets – and associated activities and interventions – can have a wide range of beneficial impacts on the physical, mental and social wellbeing of individuals and communities. https://tinyurl.com/yu7h6cc4

doc: https://whatworkswellbeing.org/wp-content/uploads/2020/01/heritage-briefing-20-MARCH.pdf

doc: https://whatworkswellbeing.org/wp-content/uploads/2020/01/Heritage-scoping-review-March-2019.pdf

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Chapter 4 - Climate emergency

Question 5 - Energy efficiency of new buildings

Option 1 - Plan for net-zero carbon from plan adoption. This would require all new development to be net-zero carbon upon adoption of the plan. However, it would be at a cost and as a consequence we may see less affordable housing built and maybe fewer other social and community benefits from development.

COMMENT:

It is not the case that more net-zero carbon housing means less affordable housing: North Somerset have agreed to a Passivhaus development with 30 % affordables: https://tinyurl.com/yyvxxsjn

Exeter has been a pioneer: https://tinyurl.com/n9ab6cp3

At 4.4, LP provides no suggestions on 'minimising emissions in the design and construction of new developments'.

The LP needs to be more ambitious with zero-carbon standards for new-builds: https://tinyurl.com/499yb2n5

The LP should insist new-builds go well beyond 'net zero carbon for operational energy': https://tinyurl.com/3yen6wmr

It should embrace circular construction approaches to fundamentally cut the use of carbon: https://tinyurl.com/2maz6pxm and https://tinyurl.com/477m5r7n

Question 6 - Provision of solar arrays/farms and windfarms

Paragraphs 4.5 to 4.7 of the Issues and Options report deals with maximising energy from renewable sources. Question 6 seeks your views on what level of support we should give.

Option 2- Not identify areas but offer general support

COMMENT:

It should be up to the Town Council, in consultation with its own residents and with reference to the NP, to determine the sites for any large-scale renewable energy schemes; as this is always such a potentially-divisive issue, it would be much better to garner support for such schemes locally rather than for them to be seen to be imposed by a higher authority.

However, to encourage Town Councils to take responsibility for finding sites, they could be asked to submit an Energy Descent Plan, as developed by the Transition Towns Movement: https://tinyurl.com/2u2pfyup

doc: https://www.dropbox.com/s/0qgbi16b51jhcua/Totnes%20EDAP%20%28c%29%20Transition%20Town%20Totnes.pdf?dl=0 (2010)

doc: https://www.resilience.org/stories/2006-06-07/energy-descent-action-plans-primer-0/ (2006)

Question 7 - Carbon saving measures

Paragraph 4.8 of the Issues and Options report sets out seven policy objectives for helping to achieve carbon neutrality including using 'waste heat', and promoting community led renewable energy schemes.

Yes, the appropriate carbon saving policy matters have been addressed

COMMENT:

In addition:

Re 4.8 5) The model of the '15-Minute Neighbourhood' could be actively supported: 'The concept is part of the sustainable urban design thinking and implies having all necessary amenities within a short walk, bike-ride or public transit trip. The strategy decentralizes the local economy.' https://tinyurl.com/292zycdw

There should be promotion of examples of real zero-carbon living – as opposed to the green-wash example of 'net-zero development' presented at a Mid Devon industrial estate: https://tinyurl.com/c9zsd32f

There is guidance for policy making – from the Climate Action Plan from FOTE: https://tinyurl.com/ykcjcvtu and the 'One Planet Development Policy' adopted by the Welsh government: https://tinyurl.com/4hk2en2s

doc: https://takeclimateaction.uk/sites/files/climate/documents/2019-10/climate%20action%20plan%20for%20councils%20pdf.pdf

doc: https://gov.wales/one-planet-development-practice-guidance

There should be consideration of the 'embodied carbon' in all developments: https://tinyurl.com/2tssry5n

Chapter 5: Housing

Question 8 - How many new homes should we plan for each year?

In Chapter 5 of the Issues and Options report we set out the current Government requirement for us to build at least 928 new homes a year (although this figure can change). Paragraph 5.4 explains that we would need to almost double the number of affordable homes (to 461 every year for the next 20 years) to meet current and future needs. Do you think we should?

Option 1 - Plan for an average of at least 928 new homes being built each year – This would accommodate levels of house building that accord with current Government requirements. It may mean, however, that we fall a long way short of meeting all affordable housing needs.

COMMENT:

The Sid Valley NP complies with its quota of new homes under government requirements

In addition:

Whilst this falls short of the affordable housing needed, simply increasing the commitment to new-builds will not necessarily lead to more affordables being built, as admitted in the Issues and Options report.

Population and economic growth rates have decreased since the current LP was created: https://tinyurl.com/2mnjnxbz and https://tinyurl.com/abrdhbye

Using algorithms to determine such rates have since been discredited: https://tinyurl.com/a3t9znsh

Moreover, "East Devon has over-delivered by 37%, 5% and 28% over the past three years (average 22%); by 33% overall over the past five years (1,155 excess houses)." https://tinyurl.com/hxcuvs5w

Question 9 - Sites for small scale housing developments

Paragraphs 5.5 to 5.7 of the Issues and Options report sets out Government policy that at least 10% of new homes should be built on smaller sites (below 1 hectare). This provides more opportunities for smaller, local businesses and is more likely to reflect local character than mass produced homes. Do you think we should?

Option 1 - Allocate or identify land for around 10% of homes to be on small sites - this approach would meet minimum government standards.

COMMENT:

The only limit to the new LP policy is that each site should be no more than 1 hectare, which could allow for several small-scale sites being developed in the Sid Valley – and this could amount to more than 10% of new homes.

These criteria would match Sid Valley NP Policy 10 which allows for small-scale housing development, with a maximum of 15 dwellings as 'exception site' residential development of land bordering the BUAB – almost all of which lies in protected AONB.

Nevertheless, NP Policy 9 specifies that "outside of the BUAB there will be a general presumption against new residential development."

"In the replies to the Second Household Survey as to where any building outside the BUAB should take place, only a very small proportion of respondents identified any such sites. In fact, the most popular response to this question was that any new housing should be in 'brownfield sites', within the BUAB."

Question 10 - Planning for housing for people at all stages of their life

Paragraphs 5.8 and 5.9 of the Issues and Options report sets out the reasons for building a range of homes that can accommodate different circumstances. What approach should we take to encourage this, or is it not something the local plan should deal with?

Option 1 - We should explicitly require housing provision for people at all stages of life. This approach could place demanding standards on developers to provide housing for all stages of people lives. It could though reduce monies available to pay for other wider community benefits from development.

COMMENT:

The VGS would support these very strict requirements, as they reflect the criteria in the Sid Valley NP Policy 12:

"The requirement for property size in the intermediate housing market is mainly one and two-bedroom units to meet the needs of concealed households and those who are unable to access the market sector as a first-time buyer. There is a small level need for some three-bedroom units from existing households often due to relationship breakdown. A property size target of 50% one bedroom, 40% two bedroom and 10% for three-bedroom units should be set to meet the requirements of households in this sector. (Second Household Survey: Q34)"

Question 11: Additional housing policy objectives

Paragraph 5.10 of the Issues and Options report identifies nine additional housing policy objectives, including encouraging more self-build homes, allocating sites for retirement housing and setting minimum space standards for new homes.

Do you think these are appropriate housing policy areas to be addressed in a new local plan and are there any other major policy areas that you think we should be addressing?

Yes, these are appropriate housing policy areas to be addressed

COMMENT:

5.10 1-3) could be furthered by supporting:

- 'Passivhaus for the mass market' [eg: Norwich https://tinyurl.com/2d9x8uxe];

- Land Trusts [eg: Brighton https://tinyurl.com/yjtvvbyy and Beer https://www.beerclt.org/];

- housing cooperatives [eg: Brighton https://tinyurl.com/y2kab3bz]; and

- broader, more innovative approaches [eg: Lammas https://tinyurl.com/2bkaxy8n as part of the Welsh government's 'One Planet Development' policy https://tinyurl.com/4986x9h2]

doc: http://www.oneplanetcouncil.org.uk/wp-content/uploads/2014/02/One-Planet-Development-TAN6.pdf

5.10 4) contradicts the Sid Valley NP's policies on balanced/mixed communities

5.10 9) supports the Sid Valley NP on WFH

Jobs and Economy

Question 12 - Preference for location for future job provision

Paragraphs 6.4 to 6.7 of the Issues and Options report explains why much recent employment development has occurred near to Exeter and where future job growth would best be located.

We set out below a number of differing potential areas in East Devon that could accommodate future job growth and development. Please indicate your in principle levels of support for each option

12a - Continued focus on big employment sites in the West End of the District

Neither oppose nor support

12b - Encouraging greater business development in other areas close to Exeter (for example expanding Greendale and Hill Barton Business Parks)

Strongly oppose

12c - Encouraging greater business development at and within the main towns of East Devon

Strongly support

12d - Encouraging business expansion and development in the villages and across the countryside of East Devon

Strongly support

12e - Encourage and enable more home working

Strongly support

COMMENT:

12b: Even though these industrial estates are in East Devon, they very much serve the economy of Exeter - which has added to the pressure for growth; furthermore, the expansion of these can adversely affect the environment: https://tinyurl.com/3k7zuvvc

There is also a 'history' behind the expansion of these sites, which suggests a limit has now been reached: https://tinyurl.com/3k7zuvvc

12c and d: Any such business expansion should be small-scale and sustainable

12e: Policy 17 of the Sid Valley NP actively supports home working.

The rise in WFH during the pandemic would suggest that this can boost the economy of East Devon: https://tinyurl.com/4spj5m2h and https://tinyurl.com/xb8j45bk

"Enter the rural environment as a destination for those displaced from, say Canary Wharf, with an enviable work/life balance, properly equipped with resources appropriate to decentralized working." https://tinyurl.com/2b3sr4rc

Question 13 - Differing jobs sectors in East Devon

Paragraphs 6.8 to 6.10 of the Issues and Options report discuss what sort of jobs the local plan should encourage, including the opportunities to attract new and emerging sectors with highly skilled jobs.

To what degree do you support, or not, the following approaches to future jobs or differing types of jobs?

13a - More jobs overall – with an emphasis on attracting new/larger employers and

inward investment in any or all sectors

Strongly oppose

13b - More high technology jobs - focussing on high technology and high skilled jobs (including in the transformational sectors).

Strongly support

13c - Local Entrepreneurs – promoting opportunities for more home/locally based/small businesses.

Strongly support

13d - Traditional Sectors - Focus on growth, resilience and diversification in our traditional sectors - such as agriculture, tourism and care

Strongly support

COMMENT:

13a: The LEP has supported inward investment, often at the expense of locally-owned SMEs: https://tinyurl.com/2uj4d8nf

This has led to 'clone towns': https://tinyurl.com/9mfcy62c

Sidmouth does not have an unemployment problem: it is "unique among local towns in that more people commute into Sidmouth to work than commute out – which gives a priority on affordable housing for key workers, rather than new employment opportunities." https://tinyurl.com/2k8yxhhp

doc: https://saveoursidmouth.files.wordpress.com/2012/06/sos-representation-in-response-to-local-plan2.doc (pages 12/13)

13b: Research for the Sid Valley NP shows that young people would like 'interesting jobs'; that Sidmouth actively promotes the STEAM economy; and that it needs entrepreneurs and businesses attracted to a high quality of work/life balance.

13c: Economic Resilience is an extensive section of the Sid Valley NP, with local entrepreneurs and SMEs as the most important part of the economy: https://tinyurl.com/4ym6shhb and https://tinyurl.com/n2uebatm

13d: Sustainable tourism should be supported: https://tinyurl.com/6nhjv2jh

Question 14 - Additional economic policy objectives

Paragraph 6.11 of the Issues and Options report identifies six areas where policies could be developed to help support the economy. These include promoting jobs close to where people live, encouraging people to patronise local businesses, supporting shared workspaces, allocating additional employment sites and links between economic development and developing a greener economy.

Do you think these are appropriate economic policy areas to be addressed in a new local plan and are there any other major policy areas that you think we should be addressing?

Yes, these are the appropriate economic policy areas

COMMENT:

16.11 1-4) The Alexandria industrial estate should be secured.

LP Policy 14.3 e) does "promote an upgrading of or new access into the Alexandria estate".

It has scope for expansion and better access: https://tinyurl.com/svp2mpna

Research demonstrates its viability: https://tinyurl.com/4buxk4yf

There are fears that it will not be developed for local SMEs: https://tinyurl.com/jhdstp79

Provision of employment sites should not be 'developer-led': there are currently several sites in Sidmouth: https://tinyurl.com/3hx833x9

Whilst a new site at Sidford is allocated in the current LP, there are reasons for removing it: https://tinyurl.com/s8bhaj5

16.11 5) The Transition Town movement provides ideas: https://tinyurl.com/9unmkrzc

doc: https://www.uclpress.co.uk/products/125696

The current pandemic suggests that people would welcome a 'green new deal': https://tinyurl.com/35kp72k

doc: https://www.greennewdealuk.org/

doc: https://neweconomics.org/2019/01/a-green-new-deal-for-the-uk

doc: https://www.theccc.org.uk/2020/06/25/covid-19-can-be-an-historic-turning-point-in-tackling-the-global-climate-crisis/

Also:

The 'Preston model' shows that local procurement can inject much into the local economy: https://tinyurl.com/cw25xvrt and https://tinyurl.com/4azy62en

doc: https://www.preston.gov.uk/article/1339/What-is-Preston-Model-

doc:https://www.local.gov.uk/sites/default/files/documents/5.66%20Driving%20inclusive%20growth%20in%20local%20areas_04_0.pdf

doc: https://www.centreforpublicimpact.org/case-study/the-preston-model-of-community-wealth-building-in-the-uk

doc: https://thenextsystem.org/the-preston-model

Chapter 7: Town Centres

Question 15 - Town centre uses

Chapter 7 of the Issues and Options report considers options for the roles of our town centres. Question 15 seeks your views on these options.

We set out below a number of differing potential uses and approaches to promoting town centre vitality and activity. Please indicate your in principle levels of support for each potential option or approach.

15a - Retail to dominate – support retail uses in town centres and if possible resist other uses.

Neither oppose nor support

15b - Promote mixed commercial uses - support retail as well as other commercial uses such as café's and offices

Strongly support

15c - Redefine town centres to smaller core areas – concentration on retail and commercial uses in the core and allowing much greater flexibility for other uses in peripheral areas

Strongly oppose

15d - Support change of use to housing – allow for any shops or commercial premises to be converted to housing

Neither oppose nor support

15e - Support community uses - promote more community spaces in town centres

Strongly support

15f - Leisure uses – promote new gyms and sports facilities in town centres.

Strongly support

COMMENT:

Changes in the high street are a national phenomena; to work with this the Grimsey report considers injecting services and housing into the town centre:
https://tinyurl.com/je29asup

The benefits of these, and of coffee shops (social centres) and charity shops (positive recycling), should be recognised: they maintain footfall, avoid empty building syndrome, attract browsing tourists and "have kept high streets alive in a very difficult climate":
https://tinyurl.com/92mxmun3

Ideas for rejuvenating the high street:

- Creating places to "work, rest and play": https://tinyurl.com/2vh6nrbs

- Recognising the sense of place, including a traditional mix of shops and housing: https://tinyurl.com/yucy43xu

- Nurturing the local character: https://tinyurl.com/pdvb7da8

- Repurposing empty retail stores and creating community food halls https://tinyurl.com/fmtn4dfd

- Creating a virtual high street: https://tinyurl.com/aktv96df

- Creating green spaces: https://tinyurl.com/tckpw329

Question 16 - Additional town centre policy objectives

Paragraph 7.6 of the Issues and Options report identifies three additional area where policies may be appropriate including the use of vacant stories over shops, resisting 'out of town' uses to support town centres and producing town centre masterplans to identify key areas for improvement.

Do you think these are appropriate retail and town centre policy areas to be addressed in a new local plan and are there any other major policy areas that you think we should be addressing?

Yes, these are the appropriate economic policy areas

COMMENT:

In addition:

Re 7.6 2) The Sidford industrial estate should not become a shopping centre: the planning application promised "Limiting retail space to ancillary show room space to avoid adverse effects on local retailers:" https://tinyurl.com/fsmbept8

Re 7.6 3) "Any mixed use or large-scale redevelopment, such as Port Royal (Eastern Town), will expect a master planning", which has received further support:
https://tinyurl.com/333pb3xk-

There are other policy areas:

- The disappearance of high street banks could be countered by the micro-bank model of SW Mutual: https://tinyurl.com/c8f4x2zy

- An e-delivery service for shops, being trialed in Exmouth, could double-up as a passenger-carrier: https://tinyurl.com/utdbe9dk

- Sensitive pedestrianisation contributes to town centre vitality: https://tinyurl.com/482ww6ju

- Mulhouse, France, offers an inspiring model of revival: https://tinyurl.com/4skjpa4d

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Chapter 8: Design

Question 17 - Designing beautiful spaces and buildings

Chapter 8 of the Issues and Options report explains how attractive places can be planned and Question 17 seeks to find out how important you think it is that this is done.

How important do you think it is that we should actively plan to create beautiful spaces and buildings?

Absolutely essential

Please provide comments below on design matters you consider to be particularly important. We would be especially interested in your views on whether we should include design codes in our future local plan for each allocated development site or whether we should make it simpler and just have general guidance.

COMMENT:

These are appropriate policy areas.

"The government's ambition is that every council will produce a local design code and guide which it claims will give residents have a "real say" in the design of new developments in their area." https://tinyurl.com/zxnkmhs7

The Sid Valley NP's Place Analysis acts as a design code: https://tinyurl.com/5pwwu823

Question 18 - Additional design policy objectives

Paragraph 8.8 of the Issues and Options report identifies two areas with the potential for additional policy work. These are encouraging innovative designs and incorporating wildlife friendly elements into developments.

Do you think these are appropriate design policy areas to be addressed in a new local plan and are there any other major policy areas that you think we should be addressing?

Yes, these are appropriate housing policy areas

COMMENT:

In addition:

8.8 1) Sustainability and resilience should be at the core of urban design: https://tinyurl.com/2yd9rsrc

Built environment professionals will need to work together: https://tinyurl.com/ju52wtrk

doc: https://b80d7a04-1c28-45e2-b904-

e0715cface93.filesusr.com/ugd/252d09_3b0f2acf2bb24c019f5ed9173fc5d9f4.pdf

doc: https://b80d7a04-1c28-45e2-b904-e0715cface93.filesusr.com/ugd/252d09_869f0ce2dc8a4a65a1b87890609ede32.pdf

The pandemic will reshape how we design our public spaces: https://tinyurl.com/ysvrdbwa and https://tinyurl.com/3az7xwmc

There are several ideas for specific post-Covid urban design: https://tinyurl.com/4sy3wess

8.8 2) Require all new developments to include swift-bricks: https://tinyurl.com/8bbe23jw

Incorporate trees into residential developments: https://tinyurl.com/btf7e45j and "all new streets should be tree-lined" https://tinyurl.com/t54yz4pd

doc: https://startwithlocal.org.uk/2019/02/13/lets-fill-our-streets-with-trees/

doc: https://www.rtpi.org.uk/media/7919/publish-retreefit.pdf

Use water, vegetation, sunlight, and natural materials in developments: https://tinyurl.com/bvs8y6t3

Chapter 9: Built heritage

Question 19 - The importance of conserving and enhancing heritage assets

Chapter 9 of the Issues and Options describes our heritage assets and sets out the positive impacts they can have on our quality of life and local economies.

Through a new local plan (and in the work of the council more generally) how important do you think it is that we should conserve and enhance our heritage assets?

Absolutely essential

Please provide any further comments on heritage asset conservation and enhancement below including on any specific matters you think a new local plan should address.

COMMENT:

Heritage assets are key on many levels: "Using the historic environment as an asset, and giving it new life, has been one of the cornerstones of the economic and social revival of our towns and cities." https://tinyurl.com/nubebtxk

doc: https://historicengland.org.uk/content/heritage-counts/pub/2019/heritage-and-the-economy-2019/

The Sid Valley has more listed buildings than anywhere in Devon, apart from Exeter: https://tinyurl.com/s2tn2hk6

An essential part to recognising the value of heritage assets is to undertake a local list; the SVA has been working with EDDC on its Heritage Strategy and Local Heritage Assets programme: https://tinyurl.com/smtm4tcj and https://tinyurl.com/bhzhzurt

However, due to lack of resources, this is not progressing: https://tinyurl.com/uxr4uw8n

The Issues and Options devotes several pages to this issue; EDDC must decide if it can provide resources to realise its ambition.

Chapter 10: Natural Environment

Question 20 - Development in protected landscapes

Paragraphs 10.3 & 10.4 of the Issues and Options report sets out the importance of protecting our protected landscapes and the potential limitations this may place on how much and where development should be placed. Question 20 seeks views on the levels of restriction you favour.

Option 2 - Allow for development to meet local needs. This would allow for limited development, specifically where it will meet smaller scale local social, housing or economic needs, it could still mean more development pressure elsewhere in East Devon.

COMMENT:

Designation of the ED AONB as a National Park would afford these landscapes greater protection, but might be too restrictive: https://tinyurl.com/trsjz3fj

doc: https://www.gov.uk/government/publications/designated-landscapes-national-parks-and-aonbs-2018-review

doc: https://www.dorsetnationalpark.com/

The Sid Valley NP allows for development beyond the BUAB – but only if it meets local needs; also, AONB landscapes are protected, with 'great importance' placed on the Sidford and Sidbury gap, for example: https://tinyurl.com/26jyeuf9

Nevertheless, the industrial estate at Sidford has been allowed, despite being rejected at planning as it impacted protected landscape: https://tinyurl.com/867dwtuv

And yet an application for a solar farm in Sidbury was rejected because "it has not been demonstrated that development in the highly protected AONB landscape is essential": https://tinyurl.com/3eyyy3yb

Difficult choices will have to be made.

Question 21 - Net gains in biodiversity

Paragraphs 10.5 to 10.7 of the Issues and Options report explains the new approach of quantifying the potential impact of development on biodiversity to inform planning decisions and ensure that there is a 'net gain'. Question 21 seeks views on the approach you would favour to gain biodiversity improvements.

In order to gain biodiversity improvements which option would you prefer?

Option 1 - On-site provision

Option 2 - Secure the habitats locally

Option 3 - Pay a cash tariff towards a strategic delivery scheme

Option 4 - A combination of the above

COMMENT:

Clearly, the best provision would be on-site, but practically speaking, this might not be possible, in which case other options will have to be found. Whereas "this is potentially a serious challenge particularly to some of the larger and more urban centric developers", in relatively rural East Devon, this should be straightforward: https://tinyurl.com/cmyzwyz3

However, planning will have to be alert to schemes built under so-called 'permitted development' rights, which would be exempt from the requirement to submit a biodiversity net gain plan: https://tinyurl.com/3fyhbzr8

Question 22 - Additional natural environment policy objectives

Paragraph 10.8 of the Issues and Options report identifies 10 additional themes for the natural environment that may benefit from policies in the local plan.

Do you think these are appropriate natural environment policy issues to be addressed in a new local plan and are there any other major policy areas that you think we should be addressing?

Yes, these are the appropriate natural environment policy issues

COMMENT

In addition:

- The LP should reference plans for a nature recovery network in East Devon: https://tinyurl.com/sp45z8t4 This is part of the push for a 'wild belt' – and the general 'rewilding of planning': https://tinyurl.com/hnjcmmfw

- It is welcome that the Axe and Otter Estuaries have become MCZs, although further marine conservation efforts should be considered, also in relation to commercial fishing and coastal development: https://tinyurl.com/vxarn8xb For example, supporting seagrass in Lyme Bay: https://tinyurl.com/4uryaymh

doc: https://www.gov.uk/government/collections/marine-conservation

- Following progress on the Lower Otter Restoration Project, similar schemes should be explored for the River Sid: https://tinyurl.com/ybpcped

- Fish passes should be installed on the River Sid, to allow the return of salmonids: https://tinyurl.com/t5we49yw Since updated: https://tinyurl.com/48m9d28t

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Chapter 11 – Transport

Question 23 - Promoting accessibility by walking and cycling

Chapter 11 of the Issues and Options report sets out the issues for promoting sustainable transport. Question 23 seeks your views on how important you think it is that new development is sited so that it is within walking distance of services and facilities.

In order to promote walking and cycling and ensure that facilities are accessible we could adopt the possible approaches detailed below, which one would you favour?

Option 3 - A combination of options 1 and 2 – This will enable some growth where existing facilities and services are accessible and have capacity with the remainder focused on growth areas to be developed with new services and facilities.

COMMENT:

The Sid Valley NP asks for shared use paths for pedestrians and cyclists in new housing developments.

Any such development should be accompanied by comprehensive plans on how to ensure that walking and cycling are the most common modes of transport.

This could mean:

- A realisation of low-traffic neighbourhoods – which should be carried out only with sensitive consultation with communities: https://tinyurl.com/ywvr76re

doc: http://betterstreets.co.uk/low-traffic-neighbourhoods-faqs-facts/

- The promotion of the 15-minute neighbourhood – because if walking and cycling are to become the norm, then services must be truly accessible: https://tinyurl.com/uzr675y5

doc: https://www.c40knowledgehub.org/s/article/How-to-build-back-better-with-a-15-minute-city?language=en_US

These policy initiatives could also apply to development in established areas.

Question 24 - Additional sustainable transport policy objectives

Paragraph 11.7 of the Issues and Options report identifies 13 key issues that may need to be considered around the theme of sustainable transport.

Do you think these are appropriate sustainable transport policy areas to be addressed in a new local plan and are there any other major policy areas that you think we should be addressing?

Yes, these are appropriate sustainable transport policy areas

COMMENT:

In addition:

There should be an appreciation of lessons learnt during the pandemic. Temporary moves to give over more road space to public transport, bikes and pedestrians may give way to more permanent measures – resulting in 'car-free' spaces: https://tinyurl.com/2eujr3wk

Whilst the government's largest ever roads expenditure programme the UK has ever seen will increase traffic and CO2 emissions, more WFH will decrease road use and the need for new roads: https://tinyurl.com/3ykxxybw

doc: https://www.transportforqualityoflife.com/u/files/200710_PRESS_RELEASE_FINAL_The_carbon_impact_of_the_national_roads_programme.pdf

There needs to be more investment in cycle routes: "a report by Cycling UK found that for every pound spent on cycling and walking schemes, £13 of economic benefit is produced." https://tinyurl.com/w39hcbhx

doc: https://www.cyclinguk.org/blog/how-much-money-cycling

Specifically, "'Money and enthusiasm' is needed to get a Sidmouth-to-Feniton bike path project off the ground." https://tinyurl.com/fuskcf2j

Including the Sidford-to-Sidbury shared path, as laid out in the Community Actions of the Sid Valley NP: https://tinyurl.com/ereu8e8r

doc: https://sidmouth.gov.uk/images/Sid_report_1.0_low_res.pdf

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Chapter 12: Infrastructure/Facilities

Question 25 - Facilities and services that are important

Chapter 12 of the Issues and Options report deals with infrastructure requirements and asks what facilities are important to people to help us prioritise what may be needed and where.

Please score the services and facilities listed below in accordance with their importance to where you live or would want to live

25a - Convenience store / Post OfficeEssentialVery importantQuite importantOf little importance

25b - SupermarketEssentialVery importantQuite importantOf little importance

25c - Childcare and nursery school provisionEssentialVery importantQuite importantOf little importance

25d - Primary schoolEssentialVery importantQuite importantOf little importance

25e - Secondary schoolEssentialVery importantQuite importantOf little importance

25f - Children's play areaEssentialVery importantQuite importantOf little importance

25g - Sports and leisure facilitiesEssentialVery importantQuite importantOf little importance

25h - Healthcare facilitiesEssentialVery importantQuite importantOf little importance

25i - Open spacesEssentialVery importantQuite importantOf little importance

25j - Easy access to a range of jobsEssentialVery importantQuite importantOf little importance

25k - Regular bus serviceEssentialVery importantQuite importantOf little importance

25l - Train stationEssentialVery importantQuite importantOf little importance

25m - Paths for walking and cyclingEssentialVery importantQuite importantOf little importance

25n - Access to full fibre broadbandEssentialVery importantQuite importantOf little importance

25o - Public houseEssentialVery importantQuite importantOf little importance

25p - Place of worship (e.g. a church)EssentialVery importantQuite importantOf little importance

25q - High quality road linksEssentialVery importantQuite importantOf little importance

25r - Emergency services (police, fire, ambulance)EssentialVery importantQuite importantOf little importance

25s - Community hallEssentialVery importantQuite importantOf little importance

25t - Youth facilitiesEssentialVery importantQuite importantOf little importance

COMMENT:

The above list has not been scored.

Whilst we appreciate the usefulness of such a list being completed, in order to gauge opinion of which services are more important than others, it is difficult to prioritise, say, 'youth facilities' over a 'post office'. Ideally, all of the above should be accessible: "While the 15-minute city might seem like a utopian impossibility, many policymakers around the globe are already beginning to give their urban cores new life with better city planning, the decentralization of services and goods." And while this might seem 'utopian' in a rural area, planning should push for this ideal: https://tinyurl.com/4mvtpfhu

Planning for this provision has not worked for Cranbrook: it is an 'eco-new town' no more, and not only due to its 'environmental requirements' being downgraded : https://tinyurl.com/3v6vcnr9 ; it is largely because it has been a town without a town centre, let alone access to basic facilities: https://tinyurl.com/5h5daktd

Question 26 - Additional infrastructure and service provision policy objectives

Paragraph 12.9 of the Issues and Options report identifies five other infrastructure and service policy objectives.

Do you think these are appropriate infrastructure and service provision policy areas to be addressed in a new local plan and are there any other major policy areas that you think we should be addressing?

Yes, these are appropriate policy areas to be addressed

<u>COMMENT:</u>

These are appropriate questions to ask.

In addition:

What are the true costs of infrastructure – in particular its environmental impact? https://tinyurl.com/wdaje6u4

doc: https://www.devon.gov.uk/greeninfrastructure/strategy/principles-and-strategic-priorities-for-devon/d8responding-to-climate-change

How can "added weight be given to all environmental policies in the current local plan", especially with regard to infrastructure? https://tinyurl.com/6vwhkna3

doc: https://democracy.eastdevon.gov.uk/mgCommitteeDetails.aspx?ID=154

Specifically:

How can high levels of nitrogen dioxide emissions be reduced? https://tinyurl.com/2wu7ctz9

doc: http://www.eclipse.co.uk/exeter/air/case.htm

How can airport and road expansions take air quality into consideration? https://tinyurl.com/3me3ea9n For example, the Sidford industrial estate: https://tinyurl.com/f6ds7jfn

doc: https://www.who.int/airpollution/ambient/interventions/en/

How can light pollution be kept to a minimum? https://tinyurl.com/rcer57rj

doc: https://www.gov.uk/guidance/light-pollution

doc: https://www.nightblight.cpre.org.uk/take-action-about-local-light-pollution

How can "embodied carbon" in buildings and infrastructure be avoided? https://tinyurl.com/kavtt9sb

doc: https://www.arup.com/perspectives/publications/research/section/circular-economy-in-the-built-environment

doc: https://www.worldgbc.org/embodied-carbon

Chapter 12: Development Strategy

Question 27 - Retaining and refining the existing settlement hierarchy

Chapter 13 of the Issues and Options report considers strategic options for the distribution of new development expressed in terms of a settlement hierarchy. Question 27 seeks your views on what your preferred pattern of development would be.

Which of the following options do you prefer for a potential settlement hierarchy?

Option 1 - Same hierarchy as current local plan: 7 Towns plus Cranbrook and the 15 Villages

COMMENT:

-

Question 28 - Broad distribution of housing development

Paragraphs 13.12 to 13.14 of the Issues and Options report considers the strategic spatial options for accommodating housing growth. Question 28 asks which broad approach to the distribution of housing development you favour.

Which broad approach to the distribution of housing development would you favour in a new local plan?

Option 1 - As existing. Continue with a distribution pattern of planned new development that is in line with the current local plan – for 60% of new homes at the West End, 30% in Towns and 10% in Villages and rural areas

COMMENT:

Whilst it might seem 'unfair' to place most of th housing in the Western part of the District, the AONB areas of the District largely prevent much development elsewhere: https://tinyurl.com/dt58k9vk

doc: https://questions-statements.parliament.uk/written-questions/detail/2018-05-01/140167

Question 29 - Future options for the type and location of development

Paragraphs 13.15 & 13.16 of the Issues and Options report sets out a range of option for accommodating development. Which do you prefer?

29a - Infilling in towns and at larger villages

Supports

29b - Building one or more additional new towns

Neither oppose nor support

29c - Planning for new villages

Neither oppose nor support

29d - Large scale (over 50 homes) urban expansions to existing towns

Strongly oppose

29e - Small scale (under 50 homes) urban expansions to towns

Support

29f - Building houses on the edges of East Devon villages

Support

COMMENT:

Sid Valley NP Policy 6 supports sensitive infilling in towns: "Development should be designed so as not to adversely impact on the amenities of its neighbours."

Policies 9/10 recognise "any new housing should be in 'brownfield' sites, within the BUAB"; although "there are only limited opportunities for brownfield development within the town without encroaching on much valued local facilities which are to be protected by the plan's other policies."

It opposes infilling in the Sidford-Sidbury gap and the creation of areas of housing of over 50 units.

It supports smaller-scale expansion on the border of the BUAB under certain conditions

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Question 30 - Establishment of a Development Corporation

Paragraphs 13.17 to 13.19 of the Issues and Options report explain the role that a development corporation could plan in delivering very large scale developments. Question 30 asks for view on how important you consider this would be.

If one or more big strategic sites for housing or mixed use development are allocated in the new East Devon local plan how important do you think the creation of a Development Corporation would be?

Absolutely essentialVery importantQuite importantOf limited importanceNot important at allIt would be a bad thing

COMMENT:

The above has not been scored.

Question 31 - Planning for development beyond 2040

Paragraph 13.20 of the Issues and Options report considers the timeframe that the local plan should consider.

Do you consider that it would be appropriate to start to plan for development in East Devon for a date well beyond 2040 in this Local Plan?

Yes it would be very sensible whether a new town is proposed or not

COMMENT:

The County Council and District Council are looking to 2050 or earlier to become 'carbon neutral': https://tinyurl.com/yt26xmy9

doc: https://democracy.eastdevon.gov.uk//documents/g143/Printed%20minutes%2003rd-Apr-2019%2017.30%20Cabinet.pdf?T=1

Chapter 14: Any Extra Comments

Question 32 - And finally...?

Are there any big planning issues that you think we have missed in this report or are there any further comments you would like to make?

COMMENT:

This Issues and Options document has been ambitious and inspiring; through this Consultation, it is hoped that the Vision Group for Sidmouth can contribute to both the visionary nature of this stage and to the collection of further evidence and documentation

to support the positive intent of the planning authorities.

We look forward to contributing at further stages in this process.

Vision Group for Sidmouth – 15 March 2021