

East Devon District Council  
Blackdown House  
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Honiton  
EX14 1EJ



Caring for the environment through  
conservation management, planning and urban design.

**ISSUED BY EMAIL**

13<sup>th</sup> March 2025

FAO Mr Matt Dickins – Planning Policy Manager  
LocalPlan@eastdevon.gov.uk

Dear Mr Dickins

**Re: Consultation Response to the East Devon Local Plan 2020-2042 (Regulation 19 Consultation)**

**Site ref: Sidm\_08**

**1.0 Background Representations:**

I write to you regarding the above-mentioned site as part of the Regulation 19 Consultation. The site is also referred to Sidm\_08\_041B in some documentation. The site was also referred to as Sidm\_27 in the HELAA 2022. The site has been put forward by my client for consideration for housing allocation, and evidence has been provided to the Local Authority as to the requirement for this.

In addition to the original Call for Sites, further evidence was supplied to the LPA on 10<sup>th</sup> June 2022. At that time, the site was referred to under FS-Case-419961866. Further to this, a consultation response to the East Devon Local Plan was provided to the HELAA of November 2022, with the reference Sidm\_27, and the Local Plan reference LP\_Sidm08\_041B.

Further to this, additional evidence and a request was supplied to the Panel Members and to the Policy Team on 11<sup>th</sup> April 2024, related to a further request, moving forward, to change the allocation to housing.

**2.0 Representation to the Consultation Local Plan**

We note that on page 4 of the Summary Site Selection Report, the site was sifted out of the process for selection for housing allocation. The site's extant approval 18/1094/MOUT is the cited reason for being sifted out. We identify why this should be reconsidered, we have previously supplied evidence as to why the change in allocation is required to support

employment investment at Alexandria Industrial Estate, and secure an attractive proposal for a housing allocation at Sidford.

The evidence and request for the allocation seeks to support the ambition to deliver a new access at the Alexandria Industrial Estate, which requires investment release from the Sidford Employment site. My client, Messrs Ford, own both sites. They currently have 36 businesses occupying accommodation at the Alexandria Industrial Estate.

### **3.0 Why the shift in drive to deliver Alexandria Industrial Estate over Sidford:**

Until the availability of the Alexandria Industrial Estate ransom strip, the Sidford employment Site was promoted for the employment growth. The Sidford Site appeared in the Draft Local Plan in 2012. It was Adopted as the allocated site in 2015. An application was submitted in line with the allocation in 2016, and refused. A reduced scale scheme was submitted in 2018 – it was also refused. The applicant appealed the refusal, and the Appeal was allowed in Aug 2019. Conditions were discharged from 2019 to 2022, alongside Reserved Matters for Scale and Appearance. Significant development commenced, and approximately a third of the site has been remodelled, with significant level changes associated with drainage betterment and watercourse remodelling. The area has been relandscaped, meadow seeded, there are new enclosures, with drainage changes and the planting of 2500 trees and hedge plants. These works have been done in accordance with Approval 18/1094/MOUT. This work was ceased once the ransom strip at Alexandria Industrial Estate became available. The works mean that application 18/1094/MOUT is extant. Current spending on the Sidford site, most notably the two EIA's and extended planning battles, resulting in Public Inquiry have taken costs to the present day to £2.5 million.

Historically, the Alexandria Industrial Estate had been stifled from an ability to secure intensified development due to inappropriate access provision. This had stifled intensification and improvement to the site for 30 years.

The LPA is aware from evidence previously provided that a ransom strip that would have enabled better access, was overpriced at a £1m asking price. *(Evidence on this point was the subject of debate, and evidence in the 2012 Local Plan Inquiry, alongside cost analysis for a road construction, which was priced between £750,000 and £1000,000, dependent on design options).*

Following the passing of a former owner, the ransom strip land became available at the Alexandria Site at a reasonable price. Unfortunately, this did not occur until after the consent was achieved and works had started at the Sidmouth Employment Site.

The first opportunity to purchase the ransom strip at a reasonable price was grasped by my clients, and has enabled the principle of improved access to a large part of the Alexandria Industrial Estate. The ransom was secured by my clients' in 2021. My clients', who own both

sites (Sidford and Alexandria), had always hoped to redevelop the Alexandria site and were frustrated by the ransom strip. Having secured the ransom strip, they immediately developed an application to transform this site. This was submitted in Sept 2022 and approved in Nov 2023, with no material changes to the original submission. Landscaping was a Reserved Matter and is presently submitted. All other Prior Approval Conditions are submitted for determination, or are already approved. The present-day costs for securing the ransom strip and the approvals so far for the Alexandria Industrial Estate have exceeded £250,000.

From the chronological history referred to above, it can be demonstrated that my clients have not stopped with their endeavours to secure new employment development, albeit there is now a change in focus.

The focus is now to redevelop the Alexandria Site in accordance with its approved application 22/2063/MOUT once all Conditions are determined (approved) and monies have been raised from the complete or partial disposal of the Sidford site for housing.

Up until the ransom strip became available, it was my client's expectation that the Alexandria site would be sold, potentially for housing as a brownfield site. The ransom strip purchase changed the fortunes of this site, subject to being able to raise capital from Sidford.

#### **4.0 Why is the allocation of Sidford (Sid-08) so important and desirable:**

In order to promote delivery of employment space, it is now important to secure some change to the allocation of the Sidford site. Correspondence issued in April 2024 highlighted the potential. Correspondence was received from the LPA from Cllr Todd Olive, who was chairing the Council's Strategic Development Panel at the time (a blend of Officers and Members with a focus on guiding development at a time where needs were not met by adopted policy). On behalf of the Panel, he identified that we needed to wait until the considered process of the Local Plan in terms of future allocations, and we were advised that the Panel was aware of our requirement to see a shift in the allocation for the Sidford Employment Site.

As mentioned, all Reserved Matters and Prior Approval Conditions have been disposed of in the case of the Sidford site, and most Prior Approvals have also been discharged for the Alexandria Site (some are submitted but not yet determined, others are approved). Also, there has been significant investment in extant works at Sidford. My client has been out to construction tenders and is therefore well versed in the costs associated with both schemes. The highway provision alone for Sidford is expected at £950,000, and it is not dissimilar at the Alexandria Industrial Estate. Other costs related to remodelling levels, new drainage, new landscaping, and new buildings means the schemes exceed £4m in both cases, and exceed the demand for employment. It is important to note, the existing Local Plan 2013-2031(outgoing) never expected the increase in employment space at Alexandria Industrial Estate. It is impossible for both schemes to be delivered with the additional costs required for the wider infrastructure and

employment accommodation. My clients accommodate the largest share of employment in Sidmouth in the Alexandria Industrial Estate and on the High Street, as such they are clear that there is insufficient demand for both sites.

Alexandria Industrial Estate largely has tired accommodation, and the approved application 22/2063/MOUT details the significant benefits it would bring, including environmentally, socially, aesthetically, to drainage, and employment space availability and employment space quality etc. There has also been overwhelming public support for this scheme.

Conversely, at Sidford, we are painfully aware that there has been the public preference to switch this site for 100% housing, hence the delay in securing the approval for the employment scheme. My client would support 100% housing allocation. A 100% allocation could secure funds to deliver the Alexandria Industrial Estate's scheme, but at 75% housing, there would be capacity from a capital receipt to deliver a significant proportion of the Alexandria proposals. My client therefore seeks a minimum of 75% site coverage for housing (approx. 52 units).

Without some shift from the LPA, it will be impossible to lever investment, and I would like to return the LPA's memory to the knowledge that it was my clients' long held expectation that the Alexandria site would be sold as part of the delivery of the Sidford site. With significant employment uplift now potentially available for the Alexandria site, it would be desirable to see employment investment on this site, and to see all or part of the Sidford employment site allocated for housing.

There are 36 businesses, which are detailed in the Alexandria application, that seek improved employment space and growth. These businesses' preferred location is the Alexandria Site, and a shift in policy position in the Emerging Plan could enable investment on this site and potentially a more publicly desired mix of use at the Sidford Site. I appreciate that the LPA may not naturally balance the financial arguments related to a single ownership of both sites, but unless the LPA can engage with the need to create financial viability for one site supporting delivery of the other, then the potential for much needed employment investment will be stifled. Plus, the additional housing is surely welcomed. The LPA recognised the need for financial viability, and needed to sell the Knowle Council Offices to secure investment for new Council Offices at Honiton, and this has created a delivery opportunity. My client's approvals are all in place, and we now need assistance to create the Alexandria scheme.

In the Consultation Draft Local Plan, I note that there are other allocations for employment and housing at Sidford. Whilst my client has no objection in principle to these allocations, it remains that his site offers a greater volume of build capacity, and in our view, it is unwise to stifle this capacity on the basis of giving no reconsideration to the Sidford Site Sidm\_08. It seems to us remarkable that only 6 sites were sifted out from consideration in Sidmouth (page 4 Summary Site Selection Aug 2024), and that the Sid\_08 was one of them, given the expressed need for a switch in the use of the site from extant employment to a housing allocation. We feel the switch

would also better complement the expected housing allocation on the opposite side of the road. The existing works (extant works) at Sid\_08 have cost a significant sum, and would equally contribute to the landscape amenity and drainage betterment of a housing scheme. The site details in the approval result in a Development area within FZ1, and as such, all the land is capable of providing good housing land.

My clients therefore object to the exclusion of their site from the Emerging Local Plan with respect to any housing allocation. For your background information, I enclose again the masterplan for a housing solution, which was supplied in April 2024. This visualisation indicates how the site could be fully developed with housing. There would also be a potentially workable option for my clients to retain approximately a quarter of the site for employment purposes. If land for employment was retained, it would be in the northeast corner of the site and could be no more than 25% of the site if my clients are to obtain sufficient resource to make good headway in the delivery of the Alexandria scheme. There has been significant interest in the site Sid\_08 from housing developers, and from nursing homes, but there has been no interest from separate employment providers other than the employment created by nursing care or major food retail (none of which align with the present (outgoing) policy position).

The rent roll information has been previously supplied and clarifies why revenue is insufficient to make a case for capital investment on both sites. The spend to date for both sites (£2.5 million and £250,000) and the future projected costs to see one of the sites delivered (in excess of £4 million for either site) is a factor in why both schemes are not viable. The investment at the Alexandria Site is dependent on a more joined up understanding of how the Alexandria and Sidford sites are linked in terms of investment. We hope, in memory of the Council's own need to upgrade its office site at the Knowle to a new location, that it will understand the importance of this representation and allocate the Sidford site for housing. If the Council cannot support this request for allocation, we would hope that evidence can be placed before the Inspector in order that the Inspector can scrutinise the points made above and previous background.

Yours sincerely

Joseph Marchant

MRTPI. IHBC. BA (Hons) TP. Dip TP. Dip Urb Des. MA Urb Des. Dip Arch Cons.

Director on Behalf of Context Logic Ltd

**Enclosure: Attached is a vision for the site if developed for housing. If 75% is developed for housing, then the extant employment layout would be retained in the north east corner and this work with the housing layout supplied, but reduces housing levels to a minimum of 52 units.**



Company Registration No. 5974097

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Secretary: Clare Felix BA (Hons)