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**From:** Sally Mynard [REDACTED]  
**Sent:** 09 January 2023 08:12  
**To:** Planning Policy  
**Cc:** Cllr Paul Arnott; Cllr Dan Ledger; Cllr Olly Davey; Wendy Harris  
**Subject:** Sidmouth Chamber of Commerce - Response to the Draft Local Plan

**Categories:** Reg.18 consultation

Dear Planning Policy Team,

Sidmouth Chamber of Commerce has comprehensively reviewed the Draft Plan document, and considered it at length. We appreciate the considerable effort that has been made by the Policy Team in producing this extensive work in such a quick time. We also very much understand the challenges imposed by the housing allocation imposed by central government.

We note the recent public comments of Michael Gove MP, indicating a relaxation of the policy, which we broadly welcome: we certainly need to build new housing, but the expectations placed upon East Devon are clearly too high, and we look forward to more deliverable targets being adopted. East Devon is a beautiful area, and its coastline and countryside need to be protected. The idea of a Greater Exeter sprawl engulfing the West End of our district should be strongly resisted. A much greater emphasis needs to be placed upon the delivery of brownfield sites and windfall opportunities: our view is that the plan procedure has fallen a long way short in identifying the potential for this kind of development.

We think these general views will be reflected across the communities of East Devon, and that a much more positive and imaginative approach is required. We very much endorse the 'green agenda' that is at the heart of the Draft Plan, but we respectfully suggest that other key elements that we would expect to see in a high-quality and comprehensive Local Plan have been neglected. Having seen the responses already made to the Consultation, we note this view is widely shared.

A far greater emphasis needs to be placed upon the provision of basic infrastructure: roads, health provision, schools, sporting and recreational facilities, utilities, public transport and community services. These are the essential requirements of modern life, not luxuries, yet they are barely mentioned. It is unacceptable to even contemplate the kind of population growth being proposed without addressing these concerns.

We also expect to see a coherent framework for recovery and growth beyond allocating slabs of bare employment land. We think that East Devon is well placed to encourage sustainable economic activity by supporting established businesses, encouraging start-ups, and creating a positive and welcoming environment for the sector. The potential is there, and, for the record, economic growth is entirely compatible with the green agenda.

As a local business organization, we inevitably take a keen interest in how the District Council sees the future of our town centres, and Sidmouth in particular. Town centres have been in crisis for a number of years, stemming from the financial crash of 2007, or even earlier. It is an issue of major public concern. Yet, there is barely a mention in the Draft Plan. Here is how the document addresses the enormous challenges that our town centres face:

"9.60. Town centre uses - All of the town centres contain a mix of town centre uses including retail, leisure, community uses and residential housing, and benefit from public transport services (including rail services from Honiton, Axminster, Cranbrook and Exmouth) and bus services to the surrounding areas and to Exeter. The Local Plan provides a positive strategy for the future development of town centres and their health is regularly monitored to ensure that, if evidence suggests that they are in decline, the Council is able to implement further measures, along with relevant stakeholders, to support their vitality and viability.

9.61. Although all the established town centres have historically experienced low vacancy rates, they are some way from meeting their full potential as retail and leisure centres and would benefit from the development of an enhanced offer. To address this issue the Council has produced masterplans for Exmouth and Cranbrook, with the aim of regenerating the former and stimulating private sector interest in both.”

Try as we might, we cannot find anywhere in the Local Plan anything which resembles ‘a positive strategy for the future development of town centres’. It simply does not exist.

We are assured that ‘if ... they are in decline, the Council is able to implement further measures, along with relevant stakeholders, to support their vitality and viability’. But in the very next paragraph, we are informed that our town centres are ‘some way from meeting their full potential’. What ‘further measures’, therefore, have been implemented? We can think of none in Sidmouth, bar the closure of public toilets, the shabbiness of our public realm, the dereliction of Port Royal and the doubling of parking charges.

Looking at other authorities, we note that ‘masterplans’ or their equivalent are standard for town centres across the country: they are a universal response to the multiple challenges that have beset their retail cores over the last fifteen years. The Masterplans for Exmouth and Cranbrook are welcome, but where are the proposals for Sidmouth and the other East Devon towns?

Our town centres need basic maintenance and cleaning: decent essential facilities and services. they need modest levels of investment and adequate, reasonably priced parking. These are the basic building blocks of economic recovery, and key to the restoration of civic pride. Town centres in East Devon look and feel neglected and abandoned.

It is disappointing and frustrating that these simple measures are not even contemplated, let alone pursued and implemented. We feel that the poor state of our town centres, and the obvious lack of interest in their health, is undermining the district reputationally and economically. Attractive and thriving town centres are important for our tourism industry.

The whole section on town centres requires a complete re-write. The negative and complacent approach should be ditched. Instead, the obvious predicament of town centres needs to be addressed head-on. Each town centre should have an individually tailored set of proposals ( or Masterplan ) to take them through the Plan period. This should have happened years ago, as is pretty much standard practice in other authorities. These individual town plans should comprise a mix of specific proposals and general policies pertaining to that town. They should be core sections within an East Devon Local Plan, as they are everywhere else.

Overall, the Draft Plan should be a more ambitious and focused instrument with tangible and realistic objectives that local residents can understand and embrace. In its present form, it is dismal and depressing, foreseeing a future of mass building of low quality, poor services, and declining infrastructure.

Kind regards

Sally Mynard  
Chair of Sidmouth Chamber of Commerce

