

Vision Group for Sidmouth submission to the draft East Devon Local Plan

The Vision Group for Sidmouth supports the approach, objectives and policies of the emerging East Devon Local Plan.

It is noted that the Local Plan has adopted several innovative and forward-thinking ideas – many of which were also included in the final submission from the Vision Group for Sidmouth of 15 March 2021 to the *Local Plan - Issues and Options: Consultation March 2021*¹.

One such inspiring notion is the **15/20-Minute Neighbourhood**, as referred to in Strategic Policy 48 and as of 11.8. However, one would have to question the placing a huge housing estate (aka: 'new town') on the border of (and therefore primarily servicing) Exeter, especially in light of the disaster of Cranbrook's lack of a town centre and over-reliance on the car². Moreover, the distance to any facilities and infrastructure of the proposed *Sidm_01* allocation also throws into doubt the viability of the 15/20-Minute Neighbourhood – should the recommendations of the Sidmouth Cycling Campaign's own submission not be taken into account.

Another idea very current is that of the **Circular Economy**, also included in the VGS submission of March 2021. This is being adopted with enthusiasm by other authorities³. However, whilst it is understood that any local plan will necessarily focus on land use, the emerging East Devon Local Plan fails to provide any mention this key idea, an idea which would help to advance the net-zero-carbon economy promoted in the plan.

These two points highlight a general feature of the draft Local Plan: whilst the VGS welcomes the emphasis on 'green issues', there is in fact very little detail as to how this vision might be achieved.

In particular, despite this general infusion of concern for the environment and net-zero, the draft Local Plan in essence is a simple reiteration of the rather tired standard planning policy of allowing housing estates to be simply 'plonked' on greenfield sites – and the allocations for the Sid Valley are no exception. As for elsewhere in the District, it has been commented on by others that, firstly, it is very hard to reconcile a green agenda with the concreting over most of the West End of the District; and secondly, the general mass building proposed in the draft Local Plan will need substantial infrastructure investment, of which there is only superficial reference.

The comments which form the VGS submission to the draft Local Plan below focus on housing, due to its central importance; however, in light of the above, the following sections of the plan are also referred to.

2.3: One of the three priorities is “**Better Homes and Communities**” – and yet the priority throughout the draft Local Plan does appear to be the provision of homes, to the neglect of provision of services the homes will require, from GP surgeries and schools, to shops and public transport. Again, there are very few clear actionable plans set out in the draft Local Plan to develop these: new homes without the support services will not create better communities.

¹ [East Devon Local Plan consultation: VGS submission - Vision Group for Sidmouth](#)

² [Futures Forum: Cranbrook loses its town centre to become a dormitory suburb of Exeter](#)

³ [Report - The circular economy at work: Jobs and skills for London's low carbon future – ReLondon](#)

2.3. The other two priorities are “**A Greener East Devon**” and “**A Resilient Economy**” – which the VGS would again welcome, as these issues are very much at the heart of a sustainable future. However, there is very little in the way of the 'green economy': protecting the environment and economic growth are not mutually exclusive – whether it is in exciting new directions for tourism⁴ or the solid model of the circular economy as referenced above. Again, it is to be welcome that the draft Local Plan emphasises 'green' issues – but it prefers to ghettoise economic activity by, again, 'plonking' industrial estates on greenfield sites, rather than focussing on the healthy regeneration of the District's town centres which would be a much 'greener' policy.

3.36: Similarly, the **Economic Vision** as set out is not followed up by a programme of action: how exactly will this be achieved is not clear. And yet, to take London as a pioneering example of 'green growth', there are countless, clearly-defined plans and projects to inspire similar in East Devon⁵.

6.146. There are only two mentions of '**healthcare provision**' (in a reference to Feniton) – and yet, as already mentioned, it is the provision of such services which is seriously lacking in the draft Local Plan – and this lack is of great concern at present. Over time, town planners and local planning authorities have created huge new developments without the essential infrastructure required, including transport and healthcare facilities, and yet these lessons do not seem to have been learnt in the drafting of the latest East Devon Local Plan. This is very apparent in a town like Sidmouth which has only one GP practice (whereas the neighbouring Lyme with a much smaller population has two GP surgeries). To repeat: “Better Homes and Communities”, “A Greener East Devon” and “A Resilient Economy” cannot be created without schools, chemists, bus services, dedicated cycle paths, park and ride services, dental services and healthcare facilities.

8. “Strategic Policy – Development of a second **new town** east of Exeter.” Again, there are not enough services or infrastructure provided for: a new school is mentioned but not a doctor's surgery, for example. Whereas the first new town was launched with the huge fanfare of it being an 'eco newtown', that aspiration was quietly dropped⁶. It is disappointing that, in a draft Local Plan such as this awash with 'green' terminology, that there is no aspiration to develop a truly green new town within its borders.

In parallel, the **Sidmouth Cycling Campaign**, the cycling group of the VGS, has made its own submission, focussing on cycling in particular, but within the context of sustainable transport.

Also, the VGS has contributed to the submission made by the **Sid Valley Biodiversity Group**, specifically Chapters 13 and 14, Caring for the Landscape and Protecting and Enhancing our Outstanding Biodiversity.

⁴ [Promoting green tourism in East Devon: 'regenerative tourism' - Vision Group for Sidmouth](#)

⁵ [How to make a power station on your street - Sidmouth Solarpunk](#) and [Money to grow: radical policy helps UK communities green their own spaces | Access to green space | The Guardian](#) and [Councils going green and cutting costs: the Circular Economy - Sustainable Sidmouth Champion Awards](#)

⁶ [Futures Forum: Cranbrook: What's the difference between a housing estate and an eco newtown?](#)

EAST DEVON LOCAL HOUSING NEEDS ASSESSMENT:

questioning the assumptions

The Executive Summary of the Housing Needs Assessment considers how establish 'current unmet need for affordable housing' – based in turn on general Local Housing Need⁷.

It states at point 20 that *the minimum LHN figure across East Devon is 918 dwellings per annum – which translates to 18,360 dwellings (918 x 20) across the twenty-year period.*

This is a figure set by central government – which in turn has to be justified (see below).

At point 23 it contrasts this figure with that of *the population projected need of 12,885 dwellings*, and that at point 24, *this additional need is made up from pent-up housing demand and more net inward migration.*

However, population and economic growth rates have been volatile since the current Local Plan was created⁸.

Using algorithms to determine such rates has since been discredited⁹.

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).”*¹⁰

Finally, there does seem to be confusion between housing 'need' and housing 'demand'¹¹.

As has been observed by a South Devon councillor:

*“Cllr Brazil told councillors and officers present about the pressure his community in south Devon was under from development. He said it would be impossible to build to meet demand because there was a never-ending queue of people who wanted to move to Devon. He emphasised that it wasn't about need, but demand.”*¹²

⁷ <https://eastdevon.gov.uk/media/3724890/east-devon-lhna-final-accessible-160922.pdf>

⁸ [Futures Forum: Is the Heart of the SW Local Enterprise Partnership delivering value for money? "Its below average performance - from unlocking investment to falling productivity - surely can only be seen as a failure?"](#)

⁹ [Calculating Devon's housing need by algorithm - Vision Group for Sidmouth](#)

¹⁰ [Devon is building 30% more houses than required! February 2021 | Devon Planning Applications | CPRE Devon](#)

¹¹ [Futures Forum: Identifying housing 'need' and Futures Forum: 'Needless Demand' >>> Or: What's the difference between 'need for housing' and 'demand for housing'?](#)

¹² [Futures Forum: Housing: "it would be impossible to build to meet demand because there is a never-ending queue of people who want to move to Devon."](#)

EAST DEVON LOCAL HOUSING NEEDS ASSESSMENT:

central government quotas: questioning the figures

There is currently the question of whether the figures in the Housing Needs Assessment will stand following central government effectively abandoning its mandatory housebuilding targets in December – as “*new development must have the support of local communities. That requires people to know it will be beautiful, accompanied by the right infrastructure, approved democratically, that it will enhance the environment and create proper neighbourhoods.*”¹³

*Cllr David Renard, housing spokesperson at the Local Government Association, claims the move should be seen as a positive as it grants much needed powers to local authorities. He stated: “It is good that the Government has recognised that national, top-down algorithms and formulas can never be a substitute for local knowledge and decision-making by those who know their areas best. We have been clear that councils and communities are best placed to decide how to build the right homes in the right places in their local areas, with the right infrastructure, and these proposed changes will help to ensure this can happen.”*¹⁴

Other planning authorities have since decided to throw out “unacceptably high” housing targets for their district – and instead will use locally calculated figures following Mr Gove’s announcement.¹⁵

It is understood that local planning authorities have been given a two year transitional period to adapt their housing proposals.¹⁶

This will be on top of central government reducing its quota for East Devon two years ago, when proposals to build 1,614 houses in the district each year were cut by almost 700.¹⁷

The VGS would therefore urge the District Council to now consider a review of the number of dwellings it plans to allow in the Sid Valley, as laid out in its Housing Needs Assessment and its draft Local Plan.

13 [Gove abandons long-held UK target to build 300,000 a year and New homes: What’s happened to the government’s housebuilding target? – BBC News](#)

14 [Government scraps housebuilding targets | Today’s Conveyancer](#)

15 [Three Rivers throws out ‘unacceptably high’ target of 12,624 new homes – HertsLive and Government’s retreat from housing targets may reopen debate over Harrogate Local Plan | Harrogate Advertiser](#)

16 [Two councils pause local plan work after Gove planning climbdown | News | Housing Today](#)

17 [‘Impossibly high number’ of new homes for East Devon scrapped by government](#)

**STRATEGIC POLICY 24 – SIDMOUTH AND ITS FUTURE DEVELOPMENT:
incorrect assumptions about 'in-commuting' numbers (again)**

Sidmouth property and rental prices are the highest in East Devon.¹⁸

The priority for new housing in the Sid Valley, therefore, must be affordable and social housing – especially as the 'balance of jobs to workers' is inadequate, contrary to what the Local Plan stipulates:

6.47: Sidmouth is the second most populous settlement in East Devon, with around 13,300 people. 43% of residents are aged 65 or over, making it one of the most elderly settlements in East Devon and, consequently, relatively few working age people. There is currently a good balance of jobs to workers in Sidmouth (1 to 1) and, although it is relatively self-contained, there remains a significant number of residents working elsewhere, with nearly one in five workers commuting from Sidmouth to Exeter.

Perhaps this should be rephrased as “there remains a significant number of workers residing elsewhere” - as Sidmouth has a large number of people commuting into town to work.

Firstly, the “*good balance of jobs to workers in Sidmouth (1 to 1)*” occurs simply by 'balancing' well-paid Sidmouth residents commuting into Exeter in order to work at the University, Science Park or Met Office – with those commuting into Sidmouth in order to work in the low-paid hospitality and care industries.

Secondly, as the application for an industrial estate at Sidford indicated, there are more workers commuting into Sidmouth than those commuting out – as referenced in the Save Our Sidmouth submission to the 2013 draft Local Plan¹⁹ and in this VGS comment on the 2018 planning application 18/1094/MOUT:

Sidmouth is the only settlement (besides Axminster) in East Devon which has more people commuting into town for work: the Chamber carried out detailed analysis of the figures, concluding that “taking into account very low unemployment, and a declining population of working people... the majority [of the workforce] will undoubtedly be sucked in from outside the town, thus INCREASING commuting.”²⁰

The VGS would therefore urge the District Council to clarify exactly as to how the new housing allocations will contribute to providing housing for the low-paid who actually work in the Sid Valley – as asked for in the Sidmouth Housing Needs Assessment.²¹

¹⁸ [Sidmouth, housing to rent and AirBnB - Vision Group for Sidmouth and East Devon's housing crisis is bigger than your backyard | Sidmouth Herald](#)

¹⁹ [REPRESENTATION FROM SAVE OUR SIDMOUTH \(SOS\)](#)

²⁰ [Futures Forum: VGS comment on Fords planning application 18/1094/MOUT >>> "there is no proven need for this particular business park](#)

²¹ <https://sidmouth.gov.uk/wp-content/uploads/2020/12/Housing-Needs-Assessment.pdf>

STRATEGIES 34 AND 35: AFFORDABLE HOUSING

POLICY 40: AFFORDABLE HOUSING

a failure to provide

Whilst national housebuilding targets have been abandoned, so too has social housing:

In 2020, there were more than a quarter of a million people on a housing waiting list in rural areas but fewer than 4,500 social homes were built in 2019-20, [according to the Country Land and Business Association](#). David Renard, the housing spokesperson at the Local Government Association, said: “The social housing supply is not sufficient to meet the current housing demand, which is why we want to see long-term plans to give councils powers to build 100,000 high-quality, climate-friendly social homes a year.”²²

The East Devon Draft Housing Strategy recognises this, with a waiting list of almost 4000.²³

As does the Local Plan, promoting “the delivery of new affordable housing in the district, through policies relating to affordable housing targets (Strategy 34) and exceptions sites (Strategy 35).”²⁴

Despite these strategies, what actually happens in practice is another matter. The Knowle site was of course public land sold off for housing – and yet that particular scheme was not able to make affordable housing as a priority, despite proclamations made at the time:

The senior planning officer stated in a letter to the developer at the time that “the scheme constitutes a C3 use and the level of affordable housing sought will come as a disappointment but we can assure you that these issues have undergone a very detailed consideration by Officers with appropriate independent legal opinion... Concerning the issue of affordable housing, the policy of the Local Plan sets out a target of 50% affordable housing for residential development in Sidmouth. The presumption is that such affordable housing should be provided on site. As a result we will be seeking on-site provision of affordable housing in this case.”²⁵

The current developers at Knowle talk of ‘policy-compliant affordable housing’ – but that provision has been reduced and ghettoised:

The updated proposals for the site’s redevelopment look to provide a purpose-built care home, Extra Care and age-restricted Retirement Living accommodation as well as policy compliant affordable housing. The number of affordable apartments has been reduced from 21 to 17. This has also enabled the affordable apartment block to be relocated from the northeast part of the Plateau to the north-west, that is stepped away from neighbouring properties.²⁶

²² [England’s affordable housing scheme falls 32,000 homes short of target | Housing | The Guardian](#)

²³ [Housing Strategy DRAFT appendix 1.pdf](#)

²⁴ [Affordable Housing – East Devon](#)

²⁵ [EAST DEVON DISTRICT COUNCIL’S “RELOCATION PROJECT” – STATEMENT OF OBJECTION – 16 July 2018](#)

²⁶ [Fresh plans to transform The Knowle into a retirement village – Devon Live](#)

This is of course an ongoing issue – whereby the local planning authority will create planning policies, which are then to all intents and purposes ignored when planning applications are submitted and then won through appeal:

“Local planning authorities specify a percentage of affordable housing that developers have to provide. But these policies are not all-powerful. In essence, financial viability assessments provide a loophole for developers to escape their affordable housing obligations.”²⁷

And in the case of Knowle, *“We are now in a position where the site has been sold on and another company are trying to create some sort of older persons’ enclave.”²⁸*

The VGS would therefore urge the District Council to ensure that the housing policies with regard to the minimum 35% affordable provision are clear and robust enough to withstand the pleas of 'viability' from developers.

²⁷ [How private developers get out of building affordable housing | New Economics Foundation](#)

²⁸ [The Knowle in 2022 – Vision Group for Sidmouth](#)

POLICY 41: HOUSING TO MEET THE NEEDS OF OLDER PEOPLE

creating unbalanced communities

The Sid Valley has an ageing population, as the introduction to Sidmouth makes clear:

6.47: 43% of residents are aged 65 or over, making it one of the most elderly settlements in East Devon

In fact, Sidmouth is one of the most elderly settlements in the country:²⁹

On the other hand, the Local Plan recognises the housing needs of younger people:

6.51: ... in recognition of the shortage of social and affordable homes, particularly for younger people and families, the plan adopts a cautiously positive policy stance to enable small scale 'exception' schemes for mixed affordable and market schemes.

It is to be welcomed, therefore, that Policy 40 on Affordable Housing seeks to “foster balanced and mixed communities”, especially with the insistence that at any new site (including proposed *Sidm_01*) provides a minimum of 35% Affordable housing.

Similarly, the priority for the Sid Valley Neighbourhood Plan is to create 'balanced communities':

The context for our vision: 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. Our goal is to promote a more balanced community...

*Housing: Questionnaire responses show that residents want to encourage a more balanced age profile in the town.*³⁰

It is disappointing, therefore, that whilst Policy 40 is clearly directed at helping younger people to find homes, nevertheless, the East Devon Local Housing Needs Assessment prioritises Housing for Older People; furthermore, Policy 41 Housing To Meet The Needs Of Older People in the draft Local Plan itself stipulates that an ageing population necessitates very specific housing provision for the elderly.

The Local Plan fails to take into account what is actually happening on the ground as it were, with projections for population increases proving to be inaccurate.

Very recently, younger families are moving to East Devon – rather than traditionally the overwhelming number of retirees. The working-from-home phenomenon is affecting market and seaside towns in positive and unprecedented ways – which needs to be planned for³¹.

The population of East Devon is not 'ageing' due to the local resident population getting older – but is due to the substantial inward migration from outside the District. By stipulating the provision of elderly specialist accommodation in great quantities within the District under Policy 41, this will simply encourage the further increase in migration of this demographic – which will itself increase migration of those attracted to the ghettoised accommodation of 'gated' and 'specialist communities' rather than encourage the mixed

²⁹ [Sidmouth is singled out as one of the towns facing the biggest increase in the elderly - Vision Group for Sidmouth](#)

³⁰ [svnp-adopted-version.pdf](#)

³¹ [Working from home - working from the seaside - Vision Group for Sidmouth](#)

and balanced communities which the draft Local Plan seeks; moreover, there is a clear risk that an increase in this demographic will put even more pressure on our already strained health service – as per the comment above.

Sidmouth already has a considerable amount of housing built specifically for the elderly, with the recent Churchill development at Sidford about to be succeeded by the McCarthy & Stone scheme on the site of the former council offices at Knowle: these dwellings are unique, in that they are ‘age discriminatory’ as people under 55 are legally unable to occupy these properties.

Whilst the private sector is building these properties in adequate measure within our District, there is some evidence that demand is not that strong. Firstly, they appear to take a long time to sell these developments. Secondly, the value of the properties typically falls quite dramatically once the marketing efforts of the developer are withdrawn. Thirdly, the value of these properties seems to stay persistently low. They are often available across the District for less than £100,000. Many appear to take a long time to sell.

The Local Plan, then, is clearly not balanced in prioritising policies to provide housing for the elderly rather than the young. If the Local Plan seeks to create a market for provision of housing for the over-75s under Policy 41, it can do likewise for the younger sections of the population.

The VGS would therefore urge the District Council to reconsider if not remove the age-restricted and discriminatory provisions of Policy 41, in particular point 6.

STRATEGIC POLICIES 27, 28 AND 34 – CLIMATE EMERGENCY, NET-ZERO CARBON DEVELOPMENT, AND EMBODIED CARBON

a failure to provide for zero-carbon housing

There are several references to 'zero-carbon' – but very few actual policies to bring this about, especially when it comes to housing.

A year ago, as part of its consultation process, a 'zero-carbon' policy was considered:

Meanwhile, EDDC's bold plans to be the 'leading light in addressing climate change and environmental issues through planning' have also been revealed, with a number of highly ambitious measures to tackle the climate change emergency. The plan features plans for all new homes to be zero-carbon, with measures such as better insulation, triple glazing, solar panels and special pumps that extract heat from the air to warm people's homes as well as district heating systems like the one at Cranbrook, which can be run on renewable energy.³²

Indeed, this was a central 'strategic' consideration in the Plan, to provide those details:

26: Strategic Policy – Net-Zero Carbon Development

Proposed policy will require that all new residential and commercial development will deliver net-zero carbon emissions. Developers would be required to submit a "carbon statement" to demonstrate how this will be achieved, in accordance with the energy hierarchy.

In addition, homes will be required to be future-proofed to avoid temperature discomfort as a result of rising temperatures.

There will also be requirements to maximise opportunities for renewable energy, and ensure that in-use energy performance is as close as possible to design intent.

Finally, there will be a requirement for major development to calculate the whole lifecycle carbon emissions, through a nationally recognised Whole Life Cycle Carbon Assessment.

However, the Passivhaus approach was rejected:

*Currently rejected alternative approaches to requiring net-zero carbon development
Option b – Require a higher standard*

An approach could be taken to require a higher standard of development, conforming for example to the more strictly defined and less flexible passivhaus. However, we have little evidence to suggest that all development could viably meet this standard. This will be explored in viability work going forward.³³

The question is whether East Devon should be going for the Passivhaus – as has happened in Exeter.³⁴

The council's housing company Exeter City Living says "We are highly regarded by clients and industry for delivering certified Passivhaus homes that are healthy and climate resilient until at least 2080." And it claims the new development at Clifton Hill "will

³² [East Devon's new draft Local Plan revealed, with potential locations for hundreds of new homes | eastdevon.gov.uk](https://www.eastdevon.gov.uk/news/32-east-devon-s-new-draft-local-plan-revealed-with-potential-locations-for-hundreds-of-new-homes)

³³ [East Devon Local Plan 2020 to 2040 – Working Draft – December 2021](#)

³⁴ [Exeter the 'accidental pioneer' in eco-housing - Vision Group for Sidmouth](#)

*enhance the local environment, provide much needed affordable housing and generate profit to be re-invested into Council Services.”*³⁵

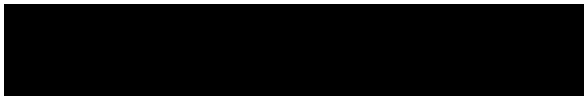
There is absolutely no mention of 'carbon-zero' housing in the East Devon Local Plan – let alone the passivhaus design. And yet across the country it has been shown to be viable on a large scale.³⁶

Nor is there any mention of 'sustainable' or 'eco' housing more generally, with so many such viable projects underway and several legal requirements in the pipeline here in the UK – including the latest, the 'water-saving house'.³⁷

The VGS would therefore urge the District Council to consider for East Devon what the likes of Exeter can do with regard to the passivhaus on a large and affordable scale, and to consider its inclusion in the Local Plan; to consider adding specific policies referring to 'zero-carbon' housing, as indicated in the 2021 working draft of the Local Plan; and to consider inclusion of more specific design and building requirements for new 'eco' housing.

Submitted by the Vision Group for Sidmouth

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³⁵ <https://exetercityliving.co.uk/>

³⁶ [The energy-saving, social housing revolution > Passivhaus for the mass market - Vision Group for Sidmouth](#)

³⁷ [Saving water with the houses of tomorrow - Vision Group for Sidmouth](#)