

East Devon District Council

East Devon Local Plan 2020 - 2040 Policies

Preferred Option Reg.18

Consultation Draft Plan

Current draft – autumn 2022

The Committee of the Sid Vale Association's comments and responses

12th January, 2023

NR.	Policy (summary)	Responses – from the Committee of the Sid Vale Association (SVA).
1	Strategic – Spatial Strategy	For Sidmouth, development should just be to suit the local needs of Sidmouth and the Sid Valley as opposed to a more extensive ‘wider surrounding area’. Accordingly we strongly disagree with para. 6.54 of the Draft Local Plan that Sidmouth is a suitable place for a ‘large amount of development’ .. albeit subject to the constraints of the AONB. Rather we would prefer redevelopment of brownfield sites/ repurposing older larger houses into flats and conversion of older commercial properties and office buildings within the Sid Valley as a more sustainable methods of increasing the housing supply.
3	Levels of future housing development	We recognise that the National Planning Policy Framework (NPPF) was originally prescriptive when the Local Plan was prepared in terms of how local housing needs are to be established and that local plans were asked to allocate sufficient land to meet those needs. However, these rules apply at the level of the district not at the level of individual neighbourhoods ie the Sid Valley. In particular we note that the Standard Method for assessing local housing need is based on ONS projections of households and includes trend migration. So “local need” was in fact not local need as most residents would accept the term (ie the excess of newly forming households in the neighbourhood plus local suppressed demand). However the Government is having a change of policy regarding NPPF ‘housing numbers’ and it is anticipated that during 2023 will determine that the ‘proposed numbers’ are just ‘advisory’ as opposed to prescriptive. So

		this anticipated change in approach has to now be reflected in the Local Plan's proposed policies. Accordingly, we propose that the Council's 'housing targets' numbers are reduced significantly except where there is a clear need for affordable housing.
4	Employment provision and distribution strategy	We question the evidence base for these proposed Policies under No 4 as the Council advise the 'Economic Development Needs Analysis' (EDNA) will not be available until an unspecified date in 2023. By the Council's own admission the 'Scale of Development' will be determined by the EDNA. The Council later say in para.3.54 their existing 'evidence is now out of date'. We consider that these Draft Local Plan proposals, are uninformed & unsound without an Evidence Base through the 'EDNA'. We do not want the Council to repeat the mistakes of the previous 2010 Local Plan when the Council chose to disregard consultants reports on Employment Land from Atkins and then Roger Tym and Partners. Subsequently the Council chose to rely on the inhouse/ out of house 'East Devon Business Forum's opinion to determine the allocation of Employment Land sites, which has been shown to be ill informed and unreliable. Local knowledge and experience indicates that there is no demand for any of these types of 'Employment Land' development in the Sid Valley. In this respect, refer to the Sidford Business Park on the north east side of Sidford which having been designated as 'Employment Land' in the last 2010 Local Plan is still not developed after 10 years. Now this original undeveloped AONB land has been put up for sale as 'brownfield land' for alternative uses

		– housing, supermarket etc. – as the owners advise in their Sale Particulars (December 2022) that there is ‘no demand for Employment Land’. This proposed Employment Land policy makes no mention of employment from Retailing, Hospitality, Tourism and the increasing trend to remote/home working. An objective and independent assessment is required of the need and actual demand for ‘Employment Land’, before any sites are allocated for this use.
5	Mixed developments Use	Is the requirement for Mixed Use development a good idea? The policy implies larger developments must provide enough employment land on the same site for one job per house. It seems to us naïve to think that there will be any match between residents and people working in an area at the tiny scale envisaged (100 dwellings) (para 3.74). Or is this just a way of ensuring an adequate supply of employment land? Para 3.73 “This ratio is the same as 0.4 hectares for 10 jobs and 0.1 hectares for 25 jobs.” Presumably a typo: should be 100 jobs not 10. To conclude as it stands it is not logical to place new housing developments next to B2 etc. industrial activities usually found in Industrial parks or industrial zones. Normal planning convention is that you separate out such activities to avoid pollution or the risk of industrial accidents impacting a residential area.
6	Development inside Settlement Boundaries	This is agreed

7	Development beyond Settlement Boundaries	We agree no development beyond the settlement boundary of Sidmouth and the Sid Valley. However the expression in this Draft Local Plan that such development beyond the 'Settlement Boundary' 'will not generally be supported' is too vague and ambiguous. The Local Plan has to be clear that absolutely no development will be allowed beyond the settlement boundary as otherwise there is a real threat to the AONB.
24	Sidmouth and its future development	The key general issue for Sidmouth is the unbalanced population, with an excess of people over retirement age and a housing market driven by wealthy new residents and demand for 2nd homes and houses for holidays lets. By default, these new residential property owners have removed the opportunities for local families to stay in Sidmouth forcing them to relocate inland north to Honiton and Dunkeswell etc. The Neighbourhood Plan sought to address this issue via its housing mix and allocation policies (para 6.51). What does the Local Plan do? Only the 35% of housing that is to be 'affordable' will have a local connection clause so the policy needs to provide more 'Affordable Housing' for renting or purchase for both local young families and 'key workers'. Separately, the Employment Policy has to be justified by showing that there will be a demand for 2.2+ Hectares of Employment Land in the Sid Valley as otherwise there is the risk the land could be used for residential purposes by default. So far no justification has been shown for the proposed additional 'Employment Land' in the Sid Valley.

		In terms of considering individual site proposals we comment as follows - (a) Land South West of Woolbrook Road (Sidm_01) - 127 new homes and 0.51 Hectares of Employment Land - There is no justification for 0.51 Hectares of Employment Land – as access is poor, there is no demand for more Employment Land and its incompatible to have Employment Land (ie B2 industrial uses) next to a new residential area). Residential development should only be allowed if it provides Affordable Housing (rented/ shared ownership etc.) and housing is reserved for a proportion of 'Key Workers'). Additionally, this proposal is contrary to this Draft Local Plan's Policy 75 as the site is within the AONB and it will not enhance the AONB. Rather this proposal will be detrimental to the AONB. With the anticipated change in Government's NPPF policy to just providing 'Advisory' – not mandatory housing targets this site should be removed from the Local Plan as a proposed housing site. (b) Land West of Two Bridges Road, Sidford (Sid_06) - 30 New Homes We strongly object to the development of this site as it constitutes infilling of the 'Green Wedge' between and separating Sidford and Sidbury. We do not support this policy as it is outside the 'settlement boundary' of Sidmouth/ Sidford and the Council's own policy discourages such development (ie Draft Local Plan Policy No 7 dictates that there should be
--	--	---

	no development outside the 'Settlement Boundary'). The Local Plan itself notes that this site could cause 'settlement coalescence' & encroach into the Green Wedge between Sidford and Sidbury again contrary to the Council's own policies (refer Draft Local Plan Policy 78 – see below and Policy 3 of the adopted 'Neighbourhood Plan for the Sid Valley 2018 - 2032 seeking to avoid 'Settlement Coalescence'). Additionally, this proposal is contrary to this Draft Local Plan's Policy 75 as the site is within the AONB and it will not enhance the AONB. Rather this proposal will be detrimental to the AONB. With the anticipated change in Government's NPPF policy to just providing 'Advisory' – not mandatory housing - targets this site should be removed from the Local Plan as a proposed housing site. (c) Peak Coach House (Numbers 1-3 Belfry Cottages) Cotmaton Road (Sidm_17) - 11 New Homes This proposal represents an overdevelopment of this existing sensitive site which currently only has 5 dwellings, has very limited vehicular access from Cotmaton Road and falls within the original curtilage of the adjacent 'Peak House', (Grade II Listed). The existing Peak Coach House buildings include a very attractive clock tower with weather vane, old Walls etc. which should be retained. This site is very prominently situated with commanding 'key' views down the
--	--

		Sid Valley looking east and equally is clearly visible from Sidmouth below and the hills above. Development of this site would cause a blot on the landscape clearly visible looking across the Valley. NB Retention of 'Key' views is Policy No 2 of the Sid Valley Neighbourhood Plan so development of this site would adversely affect views across the Sid Valley. With the anticipated change in Government's NPPF policy to just providing 'Advisory' – not mandatory housing targets this site should be removed from the Local Plan as a proposed housing site. To conclude this is not an acceptable site for inclusion in the draft Local Plan. This site provides few additional housing units and given the sensitivities of the site it needs to be considered as an individual planning application rather than being treated as a potential redevelopment site within the Local Plan. (d) Sidm_24 (land to the west of the 'Sewage Works') between Sidford and Sidbury - 1.6 Hectares - proposed as an Employment Site. This proposal is strongly objected to as – It will infill the Green Wedge between Sidford and Sidbury (contrary to the Council's Policy 78 in the Draft Local Plan – see below and Policy 3 of the adopted 'Neighbourhood Plan for the Sid Valley 2018- 2032 seeking to avoid 'Settlement Coalescence'). (i) There is no need for more Employment Land as the Alexandria Industrial Estate, Sidmouth, is now subject to a planning
--	--	---

		application for new Business Units. Additionally the adjacent proposed 'Sidford Business Park' on the north east side of Sidford is 'For Sale' as the owners advise there is no 'demand for Employment Land'. (ii) Additionally, this proposal is contrary to this Draft Local Plan's Policy 75 as the site is within the AONB and it will not enhance the AONB. Rather development of this site will be detrimental to the AONB.
25	Development at local centres	The policy has to be justified by showing that there will be a demand for 2.4 Hectares of Employment Land in Sidmouth, Sidford and Sidbury as otherwise there is the risk the land could be used for residential purposes by default. Our local market experience and knowledge is that there is no demand for more Employment Land in the Sid Valley.
26	Development at service villages	Sidm_34 – Land South of Furzehill, Sidbury – proposal for where 38 Homes are to be located. This development will change the character of Sidbury and close the Green Wedge with Sidford (contrary to Policy 78 of this draft Local Plan and Policy 3 and Map 9 of the adopted Sid Valley Neighbourhood Plan which seeks to prevent settlement coalescence). Separately, this Sidbury development proposal provides for 0.15 Hectares of Employment Land but there is no demand for Employment Land – refer to the Sidford Business Park proposal where the land is now for sale due to the property owners' stated admission that there is 'no demand for Employment Land'. Additionally, this proposal is contrary to this Draft Local Plan's Policy 75 as the site is within the AONB and it will not enhance the AONB. Rather this

		proposal will be detrimental to the AONB. Also this proposed site is contrary to Policy 3 of the adopted 'Neighbourhood Plan for the Sid Valley 2018- 2032 seeking to avoid 'Settlement Coalescence'). With the anticipated change in Government's NPPF policy to just providing 'Advisory' – not mandatory housing targets this site should be removed from the Local Plan as a proposed housing site. We strongly object to this proposed development site.
27	Climate emergency	We support
28	Net zero carbon development	We support
29	Promoting renewables	We support
30	Suitable areas for solar energy developments	OK in principle though this is unsuitable for the Sid Valley as it is mostly AONB.
31	Suitable areas for (land)wind energy sites	OK in principle though this is unsuitable for the Sid Valley as it is mostly AONB.
32	Energy Storage (Electric battery storage)	This needs to be considered on a case by case basis taking into account undesirable requirement for heavy cooling of batteries on site, risk of contamination and need to reserve funds for future decommissioning. This type of development may just be a passing fad...
36	Coastal change management areas	Agreed

	(CCMA)	
37	Relocation of uses affected by coastal change	OK in principle though this is a far reaching proposal and the detail will need to be considered and approved on a case by case basis
38	Development affecting coastal erosion	Agreed
39	Housing to address needs	Agreed, but the local connection provisos should be applied to sites in Sidmouth (and other smaller settlements), not just rural exception sites. Para 8.150 p191, Principal residence requirement, the issue is not just second homes, but also holiday rentals displacing permanent tenancies in the buy to let market. Where is the evidence that this is just a coastal towns problem? And even if it is, why cannot it be included as a local plan policy applied to designated parts of the district?
40	Affordable housing	Agreed though this is a very prescriptive policy.
41	Housing to meet the needs of older people	Agreed though dependent on an unseen 'Supplementary Planning Document'
42	Accessible etc. housing	Agreed though dependent on an unseen 'Supplementary Planning Document'
51	Employment development in Settlement Boundaries	Employment Land is only allowed if no adverse amenity impacts – this Policy is a bit of a contradiction as it could be used to exclude the majority of proposed Employment Uses thus allowing a change of use to residential.
52	Employment development in the	The policy has to be justified by showing that there will be a demand for new Employment development in the countryside as otherwise there is the

	countryside	risk the land could be used for residential purposes by default. This proposal cannot be justified until the Council provides the promised though as yet unseen 'Economic Development Needs Analysis' (EDNA).
53	Farm diversification to allow Employment Uses	The policy has to be justified by showing that there will be a demand for new Employment development on Farms as otherwise there is the risk that such designated land could be used for residential purposes by default. This proposal cannot be justified until the Council provides the promised though as yet unseen 'Economic Development Needs Analysis' (EDNA).
55	Employment and skills	If the Council is 'gathering evidence' it should not be proposing a Policy at this stage.
56	Town centre hierarchy – sequential approach and impact assessment	'Edge of (town) centre' developments should only be allowed where it is shown there will be no adverse impact on the vitality and economic vibrancy of its nearby town centre.
60	Sustainable tourism	This seems to encourage new tourist development in rural areas. In the AONB, new development for tourist accommodation should <u>not</u> be acceptable under the draft Local Plan.
61	Holiday accommodation parks in designated landscapes	Agreed
62	Design and local distinctiveness	Agreed
63	Housing density and efficient use of land with 'design codes' etc.	This policy is meaningless since conserving/ enhancing the character of the area and efficient use of land may be in tension as recognised in para 10.9; surely for each site both minimum and maximum densities are needed.

75	Areas of outstanding natural beauty (AONB)	Agreed.
77	Areas of strategic visual importance	Agreed
78	Green wedges	Agreed though where is the green wedge between Sidmouth/ Sidford and Sidbury shown on any of the Proposals maps. Rather this Draft Local Plan's development sites in the Sid Valley proposes the removal of 'Green Wedges' with yet more development between Sidford and Sidbury.
79	Land of local amenity or green space	Agreed
93	Protection of Jurassic Coast World Heritage site	Agreed though protection of the Jurassic Coast, a UNESCO 'World Heritage Site' (comparable to Stonehenge) should be given more weight and prominence as it is a key attraction to the Sid Valley and its tourist industry.
97	Land and buildings for sport, open space areas in association with development.	Why is Sidmouth the only town to which urban open space standards do not apply? (see table p280 and top of Page 281 where Sidmouth is not mentioned). Sidmouth should have its own 'Urban Open Space Standards, just like all the neighbouring towns in East Devon. Is there an adequate evidence base as Policies based on a 2015 Strategy and a new 'Playing Pitch Strategy is which is in 'in production' – Section 14.6 Page 279. No policy should be made without the production and publication of the promised 'Playing Pitch Strategy' as otherwise ill informed decisions will be made.
103	Listed Buildings	Agreed

104	Conservation Areas	Agreed
106	Historic Parks and Gardens	Agreed
	philip wragg 12/1/23	For the Committee of the Sid Vale Association (SVA) email – [REDACTED]