

Observations of Sidmouth Town Council.

The Consultation draft of the proposed new East Devon Local Plan was considered by Sidmouth Town Council on 5th December 2022.

The Town Council acknowledge the huge amount of work which has gone into preparing the draft plan within a short timescale. We also recognize that the need to provide additional houses in East Devon in the numbers proposed is driven by the Government's insistence on the Planning Authority applying the Standard Model of calculation. Following the recent amendment to the Levelling up and Regeneration Bill we understand that applying the Standard Model will become advisory rather than mandatory if the Bill becomes enacted in its current form.

The Town Council would like to know, therefore, how the Planning Authority intends to proceed with the housing allocation proposed in the draft local plan.

The Local Planning Authority recognize that severe restrictions apply in looking to allocate housing land in Sidmouth by reason of the AONB which surrounds the town on three sides and the sea on the fourth. The Authority also recognize, but does not address, the strain which additional housing will impose on local services such as schools, doctors, dentists, sewerage system, care provision etc which are already facing difficulties. **The additional burden on local services and the erosion of the AONB on which our tourism industry depends are the principal reasons why Sidmouth Town Council do not support the allocation of housing on Sidm_01, Sidm_06, Sidm_17 and Sidm_34.** Sidm_06 and Sidm-34 also contravene the Sid Valley Neighbourhood Plan by promoting the coalescence of Sidford and Sidbury and the latter site also has highway difficulties.

The Town Council have noted the proposed new policy which requires the inclusion of employment land with any housing allocation above certain sizes. This seems to be a one-size-fits-all proposal without regard to particular local circumstances. In Sidmouth we have the Alexandria Industrial Estate which is currently the subject of a proposal for improvement which the Town Council support. Planning permission has also been granted and implemented for a large Industrial Estate adjoining Two Bridges Road at Sidford. The need for additional employment land in Sidmouth has not been proven. **The Town Council does not support the allocation of employment land within the AONB at Sidm_01 or Sidm_34 or the proposed allocation at Sidm_09.**

One of the challenges facing Sidmouth is managing visitor traffic. **The Town Council would like to see land at Sidm_01 allocated in the Local Plan for a Park and Change facility.** We understand that this has the support of Devon County Council.

We welcome the proposed measures in the draft Local Plan relating to the change of use from hotels and guest houses. **However, the serviced holiday accommodation sector is so important to the economy of Sidmouth that we would like to see these provisions strengthened so that change of use becomes a very last resort.**

The Town Council have already flagged up our concern about the effect of second and holiday homes on the local community. The Local Planning Authority's response that the problem is insufficiently widespread to justify controls is unsatisfactory. Why wait until a problem escalates before taking action? **We would like the new Local Plan to introduce controls on the use of second and holiday homes.**

We are, however, aware of a need for small residential units in the Town, not only for first time buyers but also for workers in the hotels, shops, the care industry etc. **The Town Council would recommend a policy of encouraging the provision of small units of accommodation.**

There are a couple of other matters relating to the proposal maps. **The designation of the Knowle gardens and parkland as Sidm_03 with planning permission is incorrect.** We understand that the officers have agreed to correct the map.

Also, if the new Local Plan is to continue in hard copy, the **proposals maps need to be of a sufficiently large scale to be decipherable.**

We look forward to receiving a response to these observations.