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Matt Dickins Esq.,
Planning Policy Manager,
East Devon District Council,
Blackdown House,
Border Road,
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23rd January, 2026

Sent by email to:

[REDACTED]

Dear Mr Dickins,

Second regulation 19 Local plan consultation

Thank you for your email dated 8th December.

We write as the Sid Valley's amenity society founded in 1846 with approx. 1,800 members to record our comments and objections on the proposed new Local Plan policies as follows –

Strategic Policy SP01: Spatial Strategy

We contest the assertion that directing 'significant development' toward Sidmouth aligns with the goal of sustainable distribution. Under the NPPF, development within a National Landscape must be limited in scale and extent to conserve its landscape and scenic beauty. We contend that Sidmouth's spatial strategy should be restricted to meeting locally identified needs rather than absorbing wider regional growth. The 'significant development' proposed threatens the unique character and 'sense of place' of the Sid Valley—factors which are intrinsic to the local tourism economy. Irreversible harm to this sensitive visual and environmental asset would undermine the economic objectives of the Plan.

Consequently, we advocate for a 'brownfield-first' approach, prioritizing the intensification of existing built-up areas and the subdivision of oversized residential dwellings into affordable units, which offers a more sustainable pathway for housing delivery without encroaching on protected landscapes.

Strategic Policy SE04: Resisting the Loss of Employment Sites

While the intent of Policy SE04 is understood, we submit that a more flexible criteria-based approach is required to prevent the stagnation of the local built environment.

Specifically, the policy as drafted fails to account for the structural shifts in the hospitality sector, where smaller hotels and Bed & Breakfasts are increasingly unviable due to the rise of unregulated short-term holiday lets. A rigid resistance to the loss of these employment sites risks creating a legacy of vacant and derelict 'brownfield' buildings within the conservation area.

We recommend the policy be amended to include a simple 'viability test' and / or marketing period. This would allow for the Change of Use to residential (either as single dwellings or apartments) where employment use is no longer sustainable, thereby contributing to local housing stock and ensuring the continued vitality of Sidmouth's townscape.

Sidmouth and its future development

Strategic Policy SD06: Sidmouth and its development allocations

In terms of considering individual housing site proposals we comment as follows -

(a) Land South West of Woolbrook Road (Sidm_01) – formerly 127 new homes – Now increased without prior discussion to 160 homes at the suggestion of the landowner in this latest draft Local Plan.

We object to this proposal because –

- (i) There has been no prior discussion on this enlarged development site with another 33 new housing units compared to the original proposal. This enlarged site has been slipped into this latest version of the Local plan November 2025 without Consultation,
- (ii) This site encroaches in to the National Landscape (former AONB). This proposal contradicts Policy OL02 of this new version of the Local Plan that gives sites like this the 'highest

level of protection of land in the landscape and scenic beauty of the National Landscapes in East Devon' like this property.

- (iii) This proposal contradicts Policy SP06 of this new version of the Local Plan that requires new development to be within the existing settlement boundary unless expressly permitted by the Neighbourhood Plan. NB The settlement boundary has been recently extended out from Sidmouth without consultation.

We are also concerned that this development contains no Affordable Housing as required in this draft Local Plan.

(b) Land West of Two Bridges Road, Sidford (Sid_06a) –
Allocation of 'around 15 new homes'.

We object to this proposal as -

- (i) This site encroaches into the National Landscape (former AONB). This proposal contradicts Policy OL02 of this new version of the Local Plan that gives sites like this the 'highest level of protection of land in the landscape and scenic beauty of the National Landscapes in East Devon' like this property.
- (ii) This proposal contradicts Policy SP06 of this new version of the Local Plan that requires new development to be within the previously published settlement boundary/ urban boundary.
- (iii) This proposal contradicts Policy OL05: Green Wedges of this new version of the Local Plan 2020 – 2042 which will lead to 'Settlement Coalescence'.

We are also concerned that this development contains no Affordable Housing as required in this draft Local Plan.

We are also concerned that this development –

- (a) provides no details on how this sensitive site will achieve this Local Plans' own Strategic Policy PB05 (Page 257) to achieve 20% Biodiversity Net Gain (BNG),
- (b) implies the loss of existing agricultural land and,
- (c) has a history of flooding on to the busy Two Bridges Road below obstructing vehicular traffic which then has to take long diversions.

To conclude we strongly object to the development of this site.

(‘c) Land east of Burscombe Lane/ west of Windsor Mead, Sidford (Sidm_31) – ‘around’ 15 ‘single storey’ new homes with ‘expected access from Windsor Mead’.

We object as new addition to Housing sites as –

- (i) This site encroaches in to the National Landscape (former AONB). This proposal contradicts Policy OL02 of this new version of the Local Plan that gives sites like this the ‘highest level of protection of land in the landscape and scenic beauty of the National Landscapes in East Devon’ like this property.
- (ii) This proposal contradicts Policy SP06 of this new version of the Local Plan that requires new development to be within the settlement boundary/ urban boundary unless expressly permitted by the Neighbourhood Plan. This development is also outside the originally approved ‘settlement boundary’ in the previous version of the draft Local Plan, which has been recently extended without consultation.
- (iii) Public Consultation. Originally this site, proposed for development in the draft local plan consulted on in 2022/ 2023 was Rejected as being unsuitable. But then without explanation included it has been slipped in as a late addition without formal consultation on its inclusion.
- (iv) Key Views. The proposed site is elevated on a slope and will be visible from across the valley. Designs for any proposed development within the National Landscape should respect the visual and visible impact on the area including the visual effect on the protection of the “Green Wedge”. The Sid Valley Neighbourhood Plan in Policy 2 demands ‘ The protection of Key Views’ which this development will fail to do.
- (v) Access from Windsor Mead to this Burscombe Lane site - this is not practical as the access route into Burscombe Lane is privately owned land and the property owner does not want to sell his interest in the land.

So access from Windsor Mead to Burscombe Lane can only be achieved by the Council using its CPO powers which seems unlikely. Also the junction of Windsor Mead and Sidford High Street is not suitable for handling the expected increased vehicular traffic from this proposed Burscombe Lane development.

We are concerned that this development contains no Affordable Housing as required in this draft Local Plan.

We are also concerned that this development (a) should comply with this Local Plans' own Strategic Policy PB05 (Page 257) to achieve 20% Biodiversity Net Gain (BNG), (b) by the implied loss of existing agricultural land (c) should avoid the existing flooding problems down Burscombe Lane onto Sidford High Street.

In this respect, we note that Devon County Council has already objected to the outstanding planning application on this site due to the lack of a surface drainage management plan. Currently the site is naturally draining into the ground surface. Any development on this sloping site would require much improved drainage to avoid the impact of flash flooding and surface water run off affecting this site and other neighbouring land.

Also we note that the Environment Agency identifies the site may contain evidence of Romano-British settlement and recommends a Written Scheme of Investigation (WSI) prior to any development taking place.

Accordingly, we object to this proposed Burscombe Lane/ west of Windsor Mead, Sidford (Sidm_31) proposal for the reasons outlined above.

**(d) Strategic Policy SD26: Sidbury and its development allocation
Sidbury, Land south of Furzehill (Sidm_34)
Allocation for 43 New Homes (formerly 38 new Homes) –**

We accept the principle of housing on this site subject to -

- (i) Natural Landscape (former AONB). This proposal contradicts Policy OL02 of this new version of the Local Plan 2020 – 2042 that gives sites like this the ‘highest level of protection to the landscape and scenic beauty of land such as this in the ‘National Landscapes in East Devon’. In putting this site into the emerging plan the council and officers did not follow their duty as it is not legally compliant with the designation of National Landscapes, Specifically, section 245 (Protected Landscapes) of the Levelling Up and Regeneration Act 2023. We need to understand how this issue will be addressed.

- (ii) Flood Risk and resilience
This proposal requires adequate drainage through the public sewers rather than relying on draining off across the public Highway across as has been suggested the privately owned Sidbury Mill into the River Sid. It should be noted, that in response to the current planning application Devon County Council advise that they are 'not in a position to accept this development proposal as it stands'. This view is endorsed by South West Water.

- (v) Conflict with a policy area of significant archaeological interest. Devon County Council (DCC) Historic Environment Officer in his comment dated 13th December 2024 on the current outstanding planning application. We are concerned by the proximity of this site to Sidbury Castle, an early Iron Age Fort, less than half a mile west of the subject site. Accordingly the DCC Officer requires investigation works before any development can take place. So we need to understand how this issue will be addressed.

We are concerned that this development contains no Affordable Housing as required in this draft Local Plan.

We are also concerned that this development should achieve this Local Plans’ own Strategic Policy PB05 (Page 257) to achieve 20% Biodiversity Net Gain (BNG) from this proposed development on existing agricultural land with a history of flooding on to the busy road below.

We are concerned by this proposed Land South of Furzehill, Sidbury (Sidm_34) proposal and need to be assured that the requirements of the

existing Local Plan and the various statutory bodies can be satisfied before any development takes place.

We trust these comments help and please advise if we can provide any further assistance.

Yours faithfully,

Philip Wragg MA FRICS
Trustee
Sid Vale Association