

Strategy 23 – Seaton.

I wish to **object** to the proposals contained in Strategy 23 in the emerging East Devon Local Plan in relation to considering sites outside the current build up area boundary in Seaton as future development sites for new housing.

Sites on the Western boundary of the town such as SEAT_01, SEAT_08 and SEAT_10 are some of the most sensitively located and because they are highly exposed can be seen from multiple viewpoints both within the town and also outside of it, which includes from the South West Coastal Path, Axe Cliff Golf Club and Area of Outstanding Natural Beauty (AONB). Furthermore, all of these sites are on a corridor used by bats (for foraging and commuting), being in the Beer Quarry & Caves Special Area Conservation zone, with the January 2022 bat count figures suggesting there are 392 bats using the Beer Quarry Caves to hibernate, with 255 bats being of the rare Greater Horseshoe species (Source: <http://www.beerquarrycaves.co.uk/bats/>).

The adopted *Seaton Design Statement* (Page 46) states: “The land to the west and north rises towards the East Devon plateau. An important feature of the valley is the view above the developed area of a green, untouched, natural skyline.” Moreover, on Page 47 it states: “It is important that development does not encroach on the western slopes, in order to retain an undeveloped, natural skyline.” Page 33 states: “Green boundaries and screening must be retained in perpetuity.”

The current *2013 – 2030 East Devon Local Plan* (adopted 28th January 2016) states under Strategy 25 for ‘Seaton: The Future’ that: “We will enhance Seaton’s role as an attractive place to live, work and visit by: “b) Ensuring the conservation and enhancement of the world-class natural environment, understanding of its value, and non-damaging access to it as well as recognising Seaton and surrounding important built heritage assets. e) Restricting any further significant housing developments beyond the existing Built-up Area boundary by locating the majority of the required 150 houses within the existing town,” (Paragraph 13. 6, Page 82).

Any development outside of the current build up area boundary will, therefore, severely harm biodiversity and the quality and character of the countryside, as well as the skyline in the case of SEA_01 and SEA_08. As such, this makes these sites unsuitable for residential development and this must be reinforced.

Paragraph 6.42 of the emerging East Devon Local Plan (Page 80) states: “Seaton has a wide range of community facilities, with a variety of shops, sports facilities, a library, GP, hospital, and regular bus service around the settlement and to areas elsewhere. However, it is missing some of the strategic facilities found in some other larger settlements, such as a train station

and secondary school. The A3052 runs to the north of Seaton, with the strategic road network offering wider road links around 5 miles away.” Paragraph 6.45 (Page 81) states: “The population and range of community facilities and services in Seaton make it an appropriate place to locate a relatively large amount of housing and employment development.”

This conclusion is inaccurate and therefore not appropriate based on a number of factors which will be commented on separately as follows, to provide evidence why Seaton is not an appropriate place to locate a relatively large amount of housing compared to other towns in the district which do have a bigger population and wide range of community facilities:

Public Transport –

Seaton, unlike most of the other ‘Main Centres’ in East Devon is not adequately catered for by current public transport initiatives. In the last five years Seaton has seen a decline in the variety of bus services and the frequency of services directly serving the town and providing sustainable routes into other towns or cities where there are more employment opportunities and other facilities available. For example, the X52 JurassicCoaster bus service which provided an express service to Exeter, bypassing Sidmouth, was withdrawn in January 2018, with the service being the remnant of the X53 JurassicCoaster bus service that originally linked Seaton with Exeter and also with Lyme Regis, Bridport and Weymouth.

In July 2022, the alternative 9A bus service, operated by another bus operator, was reduced in its journey’s distance whereby it would no longer provide a link east of Seaton to Rousdon and Lyme Regis. In its place linking Seaton with Rousdon and Lyme Regis is a new Devon County Council-funded 378 service operated by a different bus operator. However, it currently operates just two return trips a day from Monday to Saturday (the 9A’s frequency was every hour), with the timings not being conducive with meeting the needs of those commuting to and from Lyme Regis for work. Further funding to enable it to run more frequently is not likely to be forthcoming from the County Council.

At the same time as the 9A route terminating in Seaton rather than Lyme Regis, there was the withdrawal of the early morning service from Seaton to Exeter on Saturdays, which has had a negative impact for those needing to arrive in Exeter before 9:00am for work purposes. Further changes by the same operator also saw the withdrawal of the complementary early morning X9 service which ran from Lyme Regis to Seaton and Exeter, Monday to Friday, bypassing Sidmouth, thereby providing an express service for those either attending secondary or further education schools/colleges in Exeter or working in Exeter.

The last 9A bus to leave Exeter Bus Station en route to Seaton leaves at 7:05PM, Mondays to Saturdays, (4:01PM on Sundays). This limits the ability of those working shifts in larger employment zones such as Exeter or wanting to access other facilities in the city to use the bus.

The 885 Seaton to Axminster bus service does not operate on Sundays, while the last bus to leave Axminster square en route back to Seaton leaves at 6:40PM. This, therefore, limits the ability of those using the bus in conjunction with the train at Axminster to travel further afield to larger employment areas.

There is a Devon County Council-funded 20 bus service providing a link from Seaton to Taunton via Colyton, Honiton and Wellington, twice a day from Monday to Saturday. However, the first bus leaves Seaton at 09:00am, arriving in Taunton at 11:10am, with the next bus leaving Seaton at 12:00PM, arriving in Taunton at 2:10PM. The last return bus from Taunton to Seaton leaves at 2:15PM. This, therefore, does not provide a viable means of travelling from Seaton to other towns such as Honiton, Wellington or Taunton for work or education purposes in a seamless journey. Instead, bus users need to use connecting bus services and incur additional travelling costs and inconvenience from an increased journey time.

The variety of Seaton town bus services (391/2/3) run on an hourly basis from about 9:20am onwards, although the last 393 service finishes at approximately 3:15PM, thereby limiting the ability of those who rely on the bus to travel to and from the town centre to access its facilities.

Seaton, unlike the other 'Main Centres' in East Devon, does not have complementary bus services providing a direct link to larger towns such as Axminster and Honiton or Exeter city. Nor does it have a train station to offer an alternative means of commuting to work, for secondary or further education purposes or to access additional facilities not offered in the town. As such, public transport in Seaton can be considered to be poor for the size of the town's population and limited healthcare and amenity facilities on offer, where there is a greater need to travel outside of the town in order to access them.

Community Facilities –

Strategy 25 of the current *East Devon Local Plan 2013 – 2031* states under paragraph 13.3 that: "The level of commercial services for the resident population, now that the new Tesco supermarket has opened, is seen as appropriate to discourage travel to other towns. However, community facilities, school, health, social and cultural, are seen as borderline or inadequate with no capacity to serve additional residents," (Page 81). Since the adoption of the current

Local Plan, Seaton has seen a number of local shops close which has meant residents either travelling to other towns or buying items online, neither of which is supporting the local economy.

There has also been no growth in the provision of community facilities or additional accommodation at Seaton's only primary school to address the needs that they are at full capacity. There has also been the loss of Seaton Hospital where there are now no in-patients, while other out-patient support services have been relocated to other hospital sites such as Whipton Hospital (which cannot be reached by travelling on just one bus route) or the Royal Devon & Exeter Hospital in Exeter. Community buildings such as the former St Clares Further Education site and the St John's Ambulance site, both in Colyford Road, have been demolished and the valued training opportunities they offered lost.

Since the adoption of the current East Devon Local Plan back in January 2016, Seaton has also seen no additional provision of either formal or informal use open spaces, despite an increase in the town's population. In 2015, East Devon District Council's Playing Pitch Strategy stated that "Seaton Town Football Club's Colyford Road pitch does not meet the capacity requirements, it is too narrow and the club needs additional pitches." However, the football club continues to have below the minimum number of pitches required to fulfil its training and match playing schedule. No mention of this has been made in the current East Devon Local Plan.

Concern must also be raised in relation to the accuracy of the quoted population figure of 7,500 for Seaton (Paragraph 6.41, Page 80), particularly as the quoted figure for the town in the *East Devon Local Plan 2013 – 2031* was 7,385 residents. Since the adoption of the current East Devon Local Plan 2013 - 2031, the number of new dwellings built and the change of use of some commercial properties to residential use has seen a significant gain in the amount of accommodation provided within Seaton, which exceeds the required 150 houses within the existing town. Independent figures suggest Seaton has already delivered an additional 139 new dwellings (excluding change of use properties) above and beyond the required figure of 150 new dwellings. This means nearly 300 new dwellings have been built or have received planning approval for Seaton since the adoption of the current East Devon Local Plan. Therefore, the figure of 7,500 residents in Seaton seems to be highly questionable in terms of its accuracy and the reliability of the methodology used.

In conclusion, given the decline in public transport, employment opportunities and no improvement in infrastructure services, Seaton cannot support the addition of 217 dwellings in the emerging East Devon Local Plan. Therefore the proposal under Strategy 23 is not sustainable or realistic for Seaton. I therefore **object** to the proposal for 217 dwellings for Seaton in the emerging East Devon Local Plan.