

**East Devon Local Plan Preferred Options:
Regulation 18 Consultation Draft**
Representations on behalf of Bloor Homes
South West

Sidford High Street, Sidmouth

January 2023

Turley

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Our reference

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Executive Summary

1. On the behalf of our client Bloor Homes South West Ltd ['Bloor Homes'], we write to provide representations to East Devon District Council [the 'Council'], in relation to the East Devon Local Plan ['EDLP'] Preferred Options: Reg 18. Consultation Draft Plan Autumn 2022 ['the draft LP document'].
2. We have reviewed the draft LP document in full and respond to a number of the draft policies. The main focus for our representations at this stage of the Plan is on the Council's current level of required and planned housing, and questions as to why land off Sidford High Street, Sidmouth has not been identified as a draft allocation at this stage when:
 - There is clearly an urgent housing need in EDDC for the Council to consider the release of constrained land (as shown in Sidmouth, Exmouth, Lypstone etc). In this context land should undoubtedly be brought forward in unconstrained areas, and outside of that, the most sustainable locations;
 - The delivery of just 168 homes over twenty years in Sidmouth will unlikely be sufficient to meet local needs across the same period. It is essential that varied sites of scale can come forward within the first 5 years of adoption to meet local needs and market demand. A high proportion of the housing requirement is to be delivered through large scale, strategic land allocations. These are unlikely to come forward or be complete within the first 5 years of Local Plan adoption;
 - There is insufficient supply to meet the policy housing requirement plus a 10% 'headroom' figure. Given the population of East Devon has already exceeded the 2014—based household projections for 2021 (which are used to inform the standard method and local housing need requirement), it is crucial that there is sufficient to supply to meet the policy requirement plus 10% 'headroom'.
 - The Council has acknowledged that further land (located within AONB) will need to be released for residential development. Sidmouth is a constrained settlement. The settlement development boundary is surrounded by the designated AONB, and there is a lack of sufficient suitable development opportunities within the existing settlement, and/or on previously developed land. The Coastal Protection zone also needs to be avoided. However, these constraints need to be balanced with the settlement's high sustainability credentials. There is a high provision of facilities and services (including a college, supermarkets, post offices, schools, a hospital, petrol station and recreational grounds). It is therefore an area of suitable for additional growth.
 - The Site provides many site-specific location benefits which can aid and promote sustainability, including:
 - (i) The delivery of much needed market, affordable and later living homes;
 - (ii) A potential mixed use area providing employment opportunities for existing and future local residents;

- (iii) Network of green space and providing a unique viewing area and access to the AONB creating a new public park for Sidmouth, a facility for residents of Sidmouth as whole;
 - (iv) Biodiversity enhanced areas with SUDs integrated into the landscaping;
and,
 - (v) Community areas to include allotments and improve connections to existing facilities.
- Land off Sidford High Street is available and deliverable and is of a scale that can come forward quickly, being promoted by a house builder with an enviable track record of delivery.

1. Introduction and Background

Introduction

- 1.1 On the behalf of our client Bloor Homes South West Ltd ['Bloor Homes'], we write to provide representations to East Devon District Council [the 'Council'], in relation to the East Devon Local Plan ['EDLP'] Preferred Options: Reg 18. Consultation Draft Plan Autumn 2022 ['the draft LP document'].

Background

- 1.1 Bloor Homes have an interest in land off Sidford High Street, Sidmouth. A site-specific location plan is provided at Appendix 1 of this representation, which confirms the extent of Bloor Home's land interest at Sidford High Street, Sidmouth.
- 1.2 We previously responded on behalf of Bloor Homes the Call for Sites consultation undertaken between April and May 2022, and submitted supplementary information subsequently in anticipation of a presentation being made to the Strategic Planning Committee of East Devon District Council.
- 1.3 Land off Sidford High Street comprises two parcels of land, both the original HELAA area (as shown on the Council's interactive map, Sidm_02), and the additional adjacent land which was submitted in the Call for Sites undertaken earlier this year in May 2022. Bloor Homes are promoting the Site as one cohesive development (as shown in the accompanying Vision Document and Masterplan)
- 1.4 The Site within the control of Bloor Homes to promote and develop. Bloor Homes are an experienced national house builder with a proven track record of high-quality design, with the delivery of homes across a range of site scales.
- 1.5 The Site provides many site-specific location benefits which can aid and promote sustainability, including:
 - (i) The delivery of much needed market, affordable and later living homes;
 - (ii) A potential mixed use area providing employment opportunities for existing and future local residents;
 - (iii) Network of green space and providing a unique viewing area and access to the AONB creating a new public park for Sidmouth, a facility for residents of Sidmouth as whole;
 - (iv) Biodiversity enhanced areas with SUDs integrated into the landscaping; and,
 - (v) Community areas to include allotments and improve connections to existing facilities.
- 1.6 The following documents accompany these representations:

- Location Plan showing the extent of Bloor Home’s land promotion interests (as previous call for sites submission);
- Vision Document (Turley, August 2022)
- Landscape Technical Note (EDP, dated January 2023);
- Concept Masterplan (Turley, August 2022)
- Sustainable Transport and Access Strategy Note (NRP, August 2022)

2. Response to Strategic Policies

Strategic Policy 1 – Spatial Strategy

- 2.1 The policy states that new development will be directed towards the most sustainable locations in East Devon. In particular, the spatial strategy will promote significant development at a number of Principle Centres, including Sidmouth.
- 2.2 The principle of this policy is supported. We support the fact that Sidmouth has been acknowledged as a location for growth within the draft local plan. The town has a range of services and facilities, and public transport facilities. It is therefore a sustainable location for additional growth.

Strategic Policy 2 – Housing Distribution

- 2.3 This Policy sets out the proposed housing distribution for East Devon. The housing numbers relate to the period of 2020 to 2040. For Sidmouth, it states that 168 homes will be allocated within the settlement.
- 2.4 We support the principle of housing development within Sidmouth. However, it is considered that the settlement has the potential to deliver a greater level of housing than what is currently proposed. There is clearly urgent need in EDDC for constrained land to be released (as shown in Sidmouth, Exmouth, Lymptone etc). In this context land should undoubtedly be brought forward in unconstrained areas, and outside of that, the most sustainable locations.
- 2.5 Sidmouth represents a highly sustainable location and is recognised within the currently adopted plan as a 'Main Town'. Indeed, there is a high provision of facilities and services (including a college, supermarkets, post offices, schools, a hospital, petrol station and recreational grounds). It is therefore an area of suitability for additional growth.
- 2.6 Given the proposed housing delivery relates to a period between 2020 and 2040, it is considered the delivery of just 168 homes over twenty years will not be sufficient to meet local needs across the same period. It is recognised that the Council's housing requirements of 18,920 have been derived from the Standard Methodology (as per the paragraph 61 of the NPPF). However, Policy 2 confirms that a high proportion of this requirement will be delivered by large-scale, strategic allocations, including a new town. It is essential that varied sites of scale can come forward within the first 5 years of adoption to meet local needs and market demand.
- 2.7 As research has shown¹, it takes on average, 8.4 years from validation of the first planning application to the first dwelling being completed on schemes of 2000+ dwellings. The New Town is set to deliver 2,500 homes between 2020 and 2040, while Cranbrook (an existing adopted allocation) is to deliver 4,170 homes. Together, these make up 56% of the total proposed housing allocations (6,670 of 11, 811 homes). It is

¹ [start-to-finish what-factors-affect-the-build-out-rates-of-large-scale-housing-sites.pdf \(lichfields.uk\)](https://www.lichfields.uk/start-to-finish-what-factors-affect-the-build-out-rates-of-large-scale-housing-sites.pdf)

therefore considered that these strategic sites, a significant proportion of the Council's housing allocations, are unlikely to come forward or be wholly complete within the first 5 years of the plan adoption.

- 2.8 Given that Sidmouth represents a highly sustainable location, it is considered that the settlement has potential to accommodate additional housing allocations, that of a type and scale that could come forward within the first 5 years of the plan adoption, particularly sites being promoted by an active housebuilder. It is therefore considered that the draft policy be amended to increase the number of homes to be delivered within Sidmouth, recognising that is an existing sustainable settlement that can contribute to meeting the needs of the increasing population.

Strategic Policy 3 - Levels of future housing development

- 2.9 The Policy states that Housing provision will be made for at least 18,920 dwellings to be delivered between 2020 and 2040. The minimum requirement has been derived from the standard methodology, in accordance with government guidance. We would continue to expect the Local Housing Needs figure be a minimal figure, derived from the Standard Methodology, as per the NPPF and PPG. It is considered that there are no exceptional circumstances to allow the Council to deviate from this is figure.
- 2.10 Part 3 of the policy confirms that provision will be made for a supply headroom of approximately 10% to provide housing supply flexibility in the district in the plan period. Supporting paragraph 3.17 confirms this equates to about 20,800 dwellings. The Council forecasts that there is potential to deliver approximately 20,441 dwellings in the plan period, providing about 8% 'headroom'.
- 2.11 It is important that the final housing figure continues to be expressed as a 'minimum' figure – there is a national housing crisis and a serious and significant shortage of new homes being delivered across the country where there are pressing affordability issues that are further compounded by a shortage of new homes coming forward. The housing requirement should not be a cap for development, the figure represents the minimum number of new homes that should be planned for in the authority area and in order to achieve this.
- 2.12 As such, the principle of providing a buffer / headroom housing figure is supported. However, the supporting text to the policy therefore confirms that there is currently insufficient supply to meet the policy requirement of 10% 'headroom'. In order to meet the policy requirement, a greater number of deliverable housing Sites will need to be identified. At present, the supply forecast is at odds with the drafted policy. This is particularly important, given the 2021 Census confirmed that population growth in East Devon exceeded the 2014—based household projections for 2021 (which is used to inform the Standard Methodology). The population size had increased to 150,800 in 2021, compared to the predicted figure of 143,280. Population growth is projected to steadily increase over the next 10 years within England².
- 2.13 Given the population of East Devon has already exceeded the 2014—based household projections for 2021, it is crucial that there is sufficient to supply to meet the policy

² [National population projections - Office for National Statistics](#)

requirement of 10% 'headroom'. It is considered the Council utilises existing sustainable locations for areas of growth to accommodate future local needs over the next twenty years.

- 2.14 As set out above, given that Sidmouth represents a highly sustainable area, it is considered that the settlement has potential to accommodate additional housing allocations, that could not just come forward within the first 5 years of the plan adoption but also ensure there 10% buffer is met.

Strategic Policy 5 – Mixed use developments incorporating housing, employment and community facilities

- 2.15 The draft policy requires 0.4ha of employment land for every 100 homes on all allocated sites at Tier 1 and 2 settlements and 0.1 hectares of employment land for every 25 homes in Tier 3 and 4 settlements.
- 2.16 We appreciate what the draft policy seeks to achieve, by ensuring that employment opportunities are delivered alongside new housing. However, we have concerns with the principle and wording of this policy. As drafted, it currently applies a one-size fits all approach to proposals. It does not account for the specific characteristics and constraints of a Site that may prevent it delivering employment uses alongside housing, and it does not account for locations where there may be no demand for employment uses. Furthermore, it assumes that the location for each site that falls within the policy threshold, would be appropriate for delivering employment uses. However, this approach is too broad brush; certainly, there will be site locations where the inclusion of employment would not be appropriate when considering the existing or proposed surrounding uses.
- 2.17 It is noted that the Policy allows for 'sufficient viability or other evidence' to be submitted 'which precludes the delivery of necessary employment provision within mixed use sites'. However, it is considered that the above wording is too ambiguous. It is not clear what constitutes 'sufficient evidence' to satisfy the Council and how this evidence will be assessed. It is considered that further supporting text that explains what would be considered 'sufficient' is provided.
- 2.18 It is also noted that where viability or other evidence has been provided, a financial contribution to the Council will be required. However, the Council has not yet provided the calculation for this contribution. It is considered this calculation needs be provided during the next consultation stage to ensure it is justified.
- 2.19 Overall, it is considered that the Council needs to apply a more discerning and considered approach to allocating housing and employment land. As drafted, the policy is unclear and unjustified, with requirements that could prevent deliverable housing sites coming forward. This is of particular concern when there is a national housing crisis, and the Council needs to ensure sufficient homes can be delivered to meet the LHN requirement.
- 2.20 It is considered that the policy be deleted or re-worded so it makes it clear that the policy objective is required where relevant to the Site in question.

Strategic Policy 24 – Sidmouth and its future development

- 2.21 We support the principle of development at Sidmouth, as a Tier 2 settlement within East Devon and an appropriate location for future growth and development. New housing development at Sidmouth, including affordable housing, will help to meet local needs and the needs of the wider area, helping to sustain the vitality of the town, and contributing to the delivery of the Council’s spatial strategy.
- 2.22 Given the lack of sufficient suitable development opportunities within the existing settlement, and/or on previously developed land it is inevitable that further land for development will need to be released (within the AONB). Given that such development will accord with the spatial strategy of the plan, the relevant justification exists to alter settlement boundaries and allocated land for development within this designated landscape.
- 2.23 At Sidmouth the draft plan has chosen to allocate one larger and two smaller sites for new housing at the town (representing a total of 168 homes, at a capacity of 127, 30 and 11 homes respectively). A range of other sites have been discounted as being unsuitable, or less preferable, than those that have been selected.
- 2.24 The excluded sites includes land being promoted by Bloor Homes to the North of the town (at Sidford High Street), comprising LP_Sidm_02 and LP_Sidm_35. The basis for the exclusion of this site, as either a first preference, or second choice is not clear, on the basis that it is an otherwise suitable and deliverable site, and offers the opportunity for significant new strategic open space (as a public park), which would be an asset to the town and which would help to mitigate impacts that might otherwise occur in respect of the landscape in this area. This provision is not proposed of possible as part of development associated with the sites selected as part of the LP consultation.
- 2.25 The potential for the development of this area (combining sites LP_Sidm_02 and LP_Sidm_35) has been set out in the Vision Document issued to the Council in August 2022 (this document has been included again with this consultation response for clarity). The Vision for this land clearly sets out the potential for the new public park alongside homes (including market, affordable and later living), and it is this proposal that should be assessed for plan making purposes.
- 2.26 It is assumed that a main reason for these sites not being taken forward in the plan relates to landscape impacts, and this matter is specifically covered further under the ‘Sustainability Appraisal’ heading below.
- 2.27 In addition to landscape impacts a further criticism of the submitted sites (LP_Sidm_02 and LP_Sidm_35) is in respect of access to and across the narrow lane which separates the two land parcels and as there is currently no access to the A3052. The submitted Vision Document which is with the Council shows how safe access to the A3052 could be achieved and an arrangement for crossing and possibly downgrading the existing lane where it meets the main road. This arrangement would ensure that safe and convenient access is provided into the development, and ensure that any constraints associated with the existing lane are not any impediment to development (rather the alterations may improve the current situation).

- 2.28 Otherwise this location has been assessed to have good access to facilities and employment and no heritage impacts.
- 2.29 Also despite being assessed to have significant to moderate adverse impacts on ecology, there are no issues with this land that are special/unique, or any different to other development of greenfield land being contemplated at Sidmouth (or elsewhere), the usual approach to the avoidance and mitigation for adverse impacts (as part of masterplanning and design) could be employed, and the proposed extensive new public park area represents a significant opportunity to provide habitat and other biodiversity improvements. The level of ecological impact is assessed to be the same as the otherwise preferred site (LP_Sidm_01).

Sustainability Appraisal – Landscape Sensitivity and Impact

- 2.30 The draft plan is accompanied by a Sustainability Assessment [SA] within the evidence base. In respect of the landscape criteria for the SA no distinction is made between sites LP_Sidm_02 and LP_Sidm_35 and any of those selected for as preferred or second options. The site selection report for Sidmouth has further assessed and commented on the relative merits of sites and more specific landscape impacts, and given this is an issue of key relevance then this has been reviewed further as part of the response to the Local Plan consultation. This further assessment is contained within the Technical Note prepared by EDP which accompanies this response.
- 2.31 As summary of the findings of the EDP assessment are as follows:
- Following the context of allocating land within the AONB around Sidmouth, and given the site-specific findings set out, there is no reason to believe that landscape matters [associated with the development of sites Sidm_02 and Sidm_35] would result in any unacceptable or major negative impacts which could not be mitigated through sensitive masterplanning;
 - There is no reason, nor any objective assessment within the evidence base to preclude the site's allocation for residential development;
 - In that respect, it may be the case that the 'potential' impacts of development on landscape character and visual amenity may bear upon the site's capacity (as illustrated within the note and submitted concept masterplan), but there is no reason to believe or expect that they would preclude or restrict its deliverability in line with the relevant national and local planning policy framework;
 - Accordingly, it is considered that the exclusion of Sidm_02 and Sidm_35 from the Local Plan as a draft residential allocation is considered to be pre-emptive and unjustified, on the basis that there is not currently any evidence to demonstrate that impacts on landscape matters arising from its development could not be avoided or minimised through the application of detailed design measures, the principles of which are discussed above and illustrated with the submitted material.;
 - Further, it is also unclear as to why Sidm_02 and Sidm_35 has been discarded on landscape grounds considering the similar 'score' and 'evidence' for the council's own evidence of other preferred options in the Draft Local Plan (Sidm_01).

Deliverability

2.32 To accord with the Framework, the draft Local Plan needs to allocate enough housing sites that can be brought forward at a sufficient **rate**. Paragraph 23 of the Framework states:

*“Strategic policies should provide a clear strategy for bringing **sufficient land forward, and at a sufficient rate, to address objectively assessed needs** over the plan period, in line with the presumption in favour of sustainable development. This should include planning for and **allocating sufficient sites** to deliver the **strategic priorities of the area**” [Turley emphasis].*

2.33 Two key factors that can impact on this ‘*sufficient rate*’ include resolving land ownership issues and environmental constraints of the site. These are considered further below.

Land Ownership

2.34 The Site is available now and within the control of Bloor Homes to promote and develop. As set out above, Bloor Homes are an experienced developer with a proven track record of high-quality design, and delivery of a range of site scales.

2.35 As such, importantly there are no land ownership impediments to developing the site and this is a site that is capable of being brought forward for development quickly.

Environmental Constraints

2.36 Initial feasibility work in relation to access, landscape and design has been undertaken. Technical work has demonstrated that safe access can be achieved, and a masterplan demonstrates sensitive design with regards to landscape can be achieved together with significant delivery of new open space for the town (as a public park).

Land at Sidford High Street: Site Summary

2.37 We strongly support the principle of housing development at Sidmouth, which is a Tier 2 settlement and well placed to contribute to meeting housing needs in this part of the District. Land at Sidford High Street is well placed to provide the new homes needed during the plan period, and although there would be some landscape impacts (as a result of developing land within the AONB) these are no as significant as is stated in the assessments which support the plan, and would be accompanied by the potential for the delivery of a significant new public open space (park) asset for the town, providing enhanced opportunities for access to and enjoyment of the countryside. We question why the Site has not been identified as at least a ‘second best choice’ at this stage when:

- The Council needs to identify additional land to meet the housing requirement, plus a 10% buffer / ‘headroom’.
- Land off Sidford High Street is available and capable of early delivery and is of a scale that can come forward quickly, being promoted by Bloor Homes, a house builder with an enviable track record of delivery;

- There are distinct advantages to development here which are not available from other sites, meaning it should be considered favourably in comparison to those currently preferred by the plan;
- Initial technical feasibility work (including work submitted in support of these representations) shows that the site can come forward, a safe access can be achieved, and has the potential to have a sensitive design with regards to heritage and landscape;
- Land at Sidford High Street provides many site-specific location benefits which can aid and promote sustainability, including the delivery of new market and affordable housing, delivery of enhanced habitats and biodiversity gains, and provided significant new publicly accessible open spaces.

2.38 We would welcome the opportunity to discuss further the merits of this site and address any queries that may arise as part of continuing to contribute to the preparation of the Local Plan.

Strategic Policy 27 – Climate Emergency

2.39 Strategic Policy (SP) 27 presents the targets to which new development must respond in order to meet the climate emergency and the commitment by East Devon District Council (EDDC) to be carbon neutral by 2040. The targets listed by SP 27 are:

- Delivering net-zero development;
- Maximising opportunities for delivery of renewable energy, district heat networks, zero-carbon energy and energy storage facilities; and
- Calculating the impact of embodied carbon and retaining existing buildings where possible.

2.40 We fully support the Councils target of net zero by 2040 and agree that new development can play a significant role in supporting this transition. The strategic targets listed in SP 2 are supported however it is important to ensure that suitable timeframes are in place for these targets as part of a transition to net zero by 2040. Whilst the development industry is moving at pace to net zero, huge advances in supply chains and technologies are required to deliver net zero buildings. It is important that these challenges are recognised in draft Policy and the targets outlined are not introduced immediately on plan adoption but phased in over a suitable timeframe.

Strategic Policy 28– Net-Zero Carbon Development

2.41 SP 28 places a number of targets and requirements upon new development which includes achieving Net Zero Carbon (NZC) emissions. The targets are:

- All new residential and commercial development to deliver net zero carbon development;

- Homes will be future proofed to avoid temperature discomfort as a result of rising temperatures
- Maximising the use of renewable energy and ensuring the performance gap is minimised.
- A requirement to undertake a Whole Life Carbon (WLC) assessment in accordance with a nationally recognised methodology.

2.42 We fully support the strategic objectives of SP 28 and the delivery of NZC although it is noted that the policy contains three requirements other than NZC which could be confusing to the reader and those implementing the policy.

2.43 Taking each of these draft Policy requirements in turn the we would like to make the following comments:

- The requirement for Net Zero Carbon requires further detail to suitably define the definition of NZC and the delivery mechanism. For example there are several definitions of NZC which have very different commercial and technical implications for buildings. We consider that to ensure the policy is sound and deliverable from the point of plan adoption, the draft Plan should utilise the Governments definition of NZC³ which is delivered as follows:
 - (i) From 2025 construct all dwellings to the Future Homes Standard (FHS) which will require the construction of a highly energy efficient building which uses electricity for heating, lighting and power. Heat is provided through air or ground source heat pumps and electricity is provided via photovoltaic cells. As a result of an all-electric strategy, the carbon footprint of the building constantly reduces as the electricity grid decarbonises eventually reaching net zero carbon around 2040. Assuming the local plan is adopted in 2024, then this route to NZC is deliverable and achievable. For non-domestic buildings, compliance with the 2025 Future Buildings Standard (FBS) would achieve the same output.
 - (ii) We consider that Policy SP 28 should be amended to confirm that the NZC definition is that used by the Government through the delivery of the Future Homes Standard.
 - (iii) The requirement within SP 28 to future proof homes to avoid temperature discomfort is noted and supported. We consider however that this element of Policy SP 28 is at risk of duplicating national policy. In December 2021, the Government published a new Building regulations requirement, Part O, which requires an overheating assessment on new buildings which considers the impacts of climate change. We consider that this element of SP 28 should be deleted given it is covered by Building Regulations.

³ <https://www.gov.uk/government/news/new-homes-to-produce-nearly-a-third-less-carbon>

- (iv) We support the Local Plans ambition to maximise the delivery of renewable energy in new buildings. It is important to note that this ambition will be delivered as a result of all new buildings meeting the FHS and FBS respectively. This legislation will require all new homes and non-domestic buildings to deploy extensive renewable heat and electricity generating technologies. We consider that this element of Policy SP28 should be amended to note that compliance with the FHS and FBS should meet this requirement.
- (v) We support the requirement for new development to undertake a Whole Life Carbon Assessment to calculate the carbon footprint of the building and identify mechanisms to reduce construction and operational carbon. With regards to the 'nationally recognised methodology', we recommend that the Council consider the use of the 'OneClick' Life Cycle Assessment software⁴ which is widely used and respected across the industry. It is also a relatively easy to use process for undertaking WLC assessments. We would also suggest that the Policy recognises that for outline planning applications in particular, there is rarely sufficient information to complete a full WLC assessment and therefore the policy should be amended to permit the full WLC assessment with the Reserved Matters or Detailed planning application.

Strategic Policy 33 - Heat Networks

- 2.44 SP 33 has been drafted to require new developments to consider the potential for the development of on-site heat and energy networks which have the potential to save significant volumes of carbon emissions provided they are fuelled by energy sources other than fossil fuels.
- 2.45 EDDC has a proven track record with the delivery of heat networks as demonstrated at the west end of the District at Cranbrook and Monkerton in Exeter. We are supportive of SP 33 and the ambition of EDDC to expand the delivery heat networks across East Devon.
- 2.46 Whilst we fully support the deployment of heat networks it is important that such networks are planned in a manner that will reduce carbon emissions in a cost-effective manner. To ensure this, we consider that SP 33 should reflect the following:
 - That decentralised heat networks can only save carbon if they are powered by means other than natural gas. Given the pace of decarbonisation of electricity from the national grid, the carbon content of electricity is currently significantly lower than gas⁵ which means that a gas fuelled heat network will release more carbon emissions compared to heating by electric systems.
 - In addition, new homes and buildings are considerable more energy efficient than existing stock and the introduction of the FHS and FBS in 2025 will further

⁴ <https://www.oneclicklca.com/>

increase energy efficiency ratings. This will result in very low heat demands from dwellings and the majority of non-domestic buildings which will render a neat network unviable. We recognise the desire of EDDC to promote heat networks however and would like to suggest the following amendments to SP 33 to provide the flexibility to determine on the viability of such a system on each application:

For all major developments proposed within 1km of an existing heat network a feasibility study will be undertaken to determine the commercial and technical viability of connection to that network and that it will result in a reduction in carbon emissions. In addition, where no heat network currently exists, a feasibility study will be required for proposals above 1,200 homes or 10 ha of commercial floorspace.

Strategic Policy 40 – Affordable Housing

- 2.47 This Policy states that at least 35% of residential schemes of 10 or more dwellings should be affordable. It is essential for the overall soundness of the plan that the proposed affordable housing quantum is subject to robust viability assessment. This should have regard to all other policy requirements for development, and ensure that the total policy ‘ask’ is clearly assessed as part of a robust viability model to inform the plan. This will naturally include issues of affordable housing mix, and how the plan will meet the ‘First Homes’ policy set by government. This issue is likely to go to the heart of the deliverability of the plan and the soundness of policies which are being included to guide sustainable development in East Devon.

Strategic Policy 41 – Housing to Meet the Needs of Older People

- 2.48 We are supportive of the principle of the Policy in providing homes that are suitable to meet the needs of older people and disabled people. However, as drafted, it currently applies a one-size fits all approach to proposals. It does not account for the specific characteristics and constraints of a Site that may prevent it delivering homes appropriate for older and disabled people. It is considered the policy should be amended to allow for greater flexibility to ensure deliverability is not impacted and Sites can come forward in an efficient manner.
- 2.49 It is also essential for the overall soundness of the plan that the quantum of proposed housing for older people and disabled people is subject to robust viability assessment. This should have regard to all other policy requirements for development, and ensure that the total policy ‘ask’ is clearly assessed as part of a robust viability model to inform the plan.

Strategic Policy 42 – Accessible and Adaptable Housing

- 2.50 This Policy relates to Accessible and Adaptable Housing. It sets out the standards from Building Regulations Approved Document M: Volume 1 (Access to and use of dwellings) (or replacement standards) that will apply to new dwellings, subject to consideration of site suitability and site viability.

- 2.51 We are supportive of providing homes that are suitable to meet the needs of older people and disabled people. The draft plan is accompanied with a Local Housing Needs Assessment that identifies the need for nationally described standards for accessible and adaptable homes (Part M4(2)) and wheelchair users (Part M4(3)). The report concludes that the need is largely driven by a growing population of older persons.
- 2.52 It is considered that the draft policy be modified to take into account Planning Practice Guidance which states that Local Plan policies should also take into account site specific factors such as vulnerability to flooding, site topography, and other circumstances which may make a specific site less suitable for M4(2) and M4(3) compliant dwellings, particularly where step free access cannot be achieved or is not viable. Where step-free access is not viable, neither of the Optional Requirements in Part M should be applied (ref. 008 Reference ID: 56-008-20160519)
- 2.53 It is also considered that any additional standard which are imposed via this policy (or any modified version) should be subject to robust viability assessment as part of preparing a final version of the plan.

Strategic Policy 43 - Market housing mix

- 2.54 The policy sets out how the Council will seek to achieve a mix of housing types and sizes across East Devon. The need for a variety (mix) of new housing is supported. It is recognised that the draft policy currently includes acceptable circumstances where a proposals departure from the required housing mix is justified. It is recommended that this wording to allow for flexibility in schemes is retained within future iterations of the draft plan. It helps to ensure where Sites are particularly constrained or face viability concerns, will be able to come forward.

Strategic Policy 44 – Self-Build and Custom Build Housing

- 2.55 The need for a variety (mix) of new housing is supported, but Policy 43 should take a flexible rather than prescriptive approach. Further evidence around viability should be presented to support the requirements for self and custom build housing being proposed by the policy and which is to apply in a blanket way across major developments of 20 homes or more.

Strategic Policy 84 – Protection of Internationally and Nationally Important Wildlife Sites

- 2.56 This policy relates to international, national, regional and locally important wildlife sites so the title of this policy should be amended to reflect this scope. The first part of the policy relates to internationally and nationally important sites so the first sub-heading needs to be amended to reflect this i.e. reference to locally-important sites should be removed from the sub-heading.
- 2.57 Reference is made to biodiversity net gain for impacts to all Wildlife Sites. It is considered that this duplicates policy requirements set out in Policy 87 – Biodiversity Net Gain, and should therefore, be removed. Furthermore, proposed avoidance, mitigation and, as a last resort, compensation measures for impacts to designated sites

(refer also to Paragraph 2.4 below) should ensure that the integrity of these site is maintained and significant harm avoided e.g., in relation to the Conservation Objectives for National/International Wildlife Sites such as SACs, SPAs or Ramsar Sites, or the 'Favourable Condition' of sites such as SSSIs. There is no requirement to achieve a net gain for these sites, either in the National Planning Policy Framework (NPPF), legislation or elsewhere.

- 2.58 The application of the ecological mitigation hierarchy for impacts to National/International Wildlife Sites such as SACs, SPAs and Ramsar Sites should be amended to reflect the due process that it required under the Conservation of Habitats and Species Regulations 2017 (as amended; the 'Habitats Regulations') for ensuring that the integrity of these sites is maintained. The effect of a plan or project on the integrity of these sites should only consider avoidance and mitigation measures for adverse effects in the first instance. If the plan or project is considered to have a residual adverse effect on site integrity following consideration of these measures, compensation measures should only be proposed after it has been concluded that no alternatives exist and that the 'Imperative Reasons for Over-riding Public Interest' (IROPI) test has been satisfied.
- 2.59 Habitats of Principal Important (note Principal spelt incorrectly in the Policy and at other locations in the Consultation Local Plan) have been included in this Policy. These are not Wildlife Sites and it is considered that these habitats should be addressed through inclusion under Policy 85 to ensure a clear and consistent approach.

Strategic Policy 85 – Protection of irreplaceable habitats and important features

- 2.60 As set out above in Paragraph 2.5, Habitats of Principal Importance should be addressed by this policy.

Strategic Policy 86 – Habitats Regulations Assessment

- 2.61 Habitats Regulations Assessment is a legal requirement under the Conservation of Habitats and Species Regulations 2017 (as amended) for a plan or project that could affect a SAC, SPA, pSAC, pSPA or Ramsar site. Therefore, policy requiring this approach is considered to be duplication of a legal process and is not required. Accordingly, it is recommended that the section of the Policy entitled 'HRA process and requirements' is deleted. The Policy should then be changed to 'HRA avoidance and mitigation strategies and guidance'.
- 2.62 Following the current proposed section on 'Specific mitigation strategies and guidance', Policy 86 details 'Specific HRA policy requirements to avoiding mitigating and compensating for HRA impacts'. There is significant duplication of text within this latter section and guidance provided in the mitigation strategies referenced. To avoid duplication of text and inconsistency, it is recommended that the Policy relies on the strategy documents referenced. If these strategy documents are considered to be deficient and/or require updating, these should be updated accordingly.

Strategic Policy 87 - Biodiversity Net Gain

- 2.63 Under this Policy, development proposals will need to deliver a minimum of 20% net gain in biodiversity. The Environment Act 2021 sets out a minimum of 10% net gain for development. Whilst this requirement is not currently law, per se, secondary legislation requiring this level of gain (likely to become law in November 2023) is unlikely to change the 10% minimum requirement initially. Therefore, once a legal requirement, development that would deliver a gain of 10-19% would be legally compliant (acceptable in law) but would not be policy compliant under proposed Policy 87. To ensure consistency with the proposed legislation, it is recommended that the Policy aligns with the legal net-gain requirement in place at that time, with 10% net gain set as the initial default position. This flexible and consistent approach would obviously allow the Policy net-gain requirement to increase above 20%, should the legislation set a higher requirement in the future.
- 2.64 Notwithstanding the above requirement for parity between the legal and policy requirements for net gain in biodiversity, it is noted that the justification for Policy 87 (Paragraphs 13.37-13.44 of the Consultation Local Plan) does not present evidence that justifies the increase in the net-gain requirement from 10% to 20%. Documents referenced in the justification are all pre-November 2021 (when the Environment Act became law) so the Government and its nature-conservation advisors would have been fully aware of this information when setting the 10% target. The documents identify the clear and significant declines in biodiversity globally and within the UK but do not identify a specific situation in East Devon that justifies the requirement for net-gain delivery to be greater than that set nationally. Specific evidence should, therefore, be provided to demonstrate why East Devon warrants a higher net-gain requirement. The position, if progressed, should also be supported by a specific viability assessment relative to East Devon.

Strategic Policy 88 – Local Nature Recovery Strategy and Nature Recovery Network

- 2.65 Clarification is required as to the meaning of ‘proposals’, which, as per the proposed Policy, ‘must contribute to the strategic objectives of the Local Natural Recovery Strategy....’.

Strategic Policy 89 – Ecological Impact Assessment

- 2.66 The first section of this Policy should be entitled ‘Ecological Impact Assessment process’. It is considered that policy text could be rationalised in this section e.g. text on deviation from best practice could be included in the ‘Justification’ section, which follows the Policy. It is recommended that the heading ‘Protected and notable species’ before paragraph 13.53 on the Consultation Local Plan is deleted. Text within paragraph 13.53 can simply be included within the ‘Justification’ sub-section above. This will avoid confusion with the following policy, Policy 90, which relates to protected and notable species.

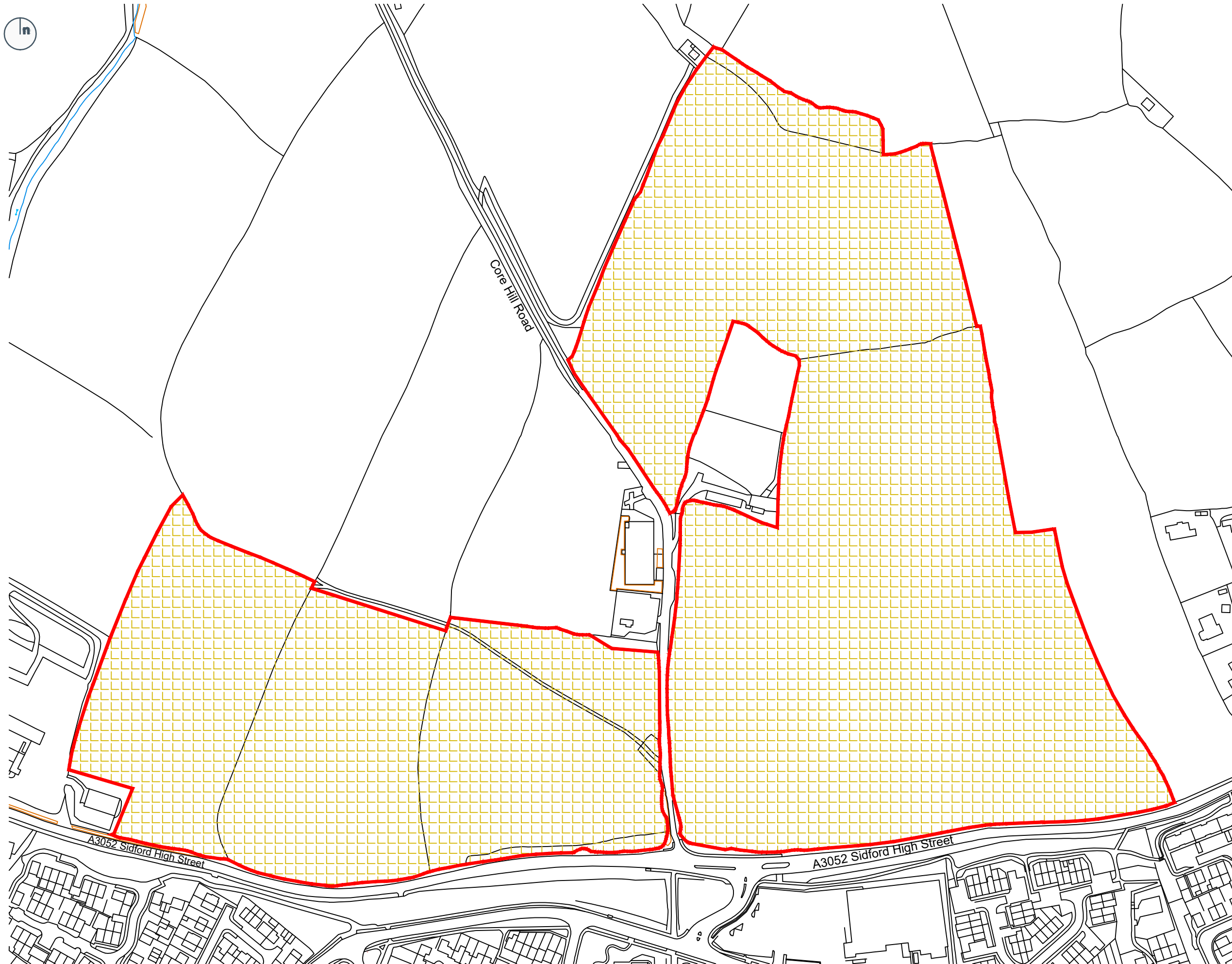
Strategic Policy 90 – Ecological Impact Assessment

- 2.67 Reference is made to the consideration of European Protected Species, defined as species listed under Annex II and IV of the Habitats Directive. It is considered that this should be modified and defined as species listed under Schedules 2 and 5 of the Habitats Regulations. The fifth bullet point in the first series of bullet points (defining protected and notable species) should be modified to text only i.e. not a bullet point.


Strategic Policy 91 – Ecological enhancement and incorporation of design features to maximise the biodiversity value of proposals

- 2.68 As identified for Policy 88, clarification is required as to the meaning of ‘proposals’ within this Policy.

Appendix 1: Location Plan



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KEY
 Application Boundary
 Total Land Area = 19.34 ha

CLIENT
 Bloor Homes
PROJECT
 Land at Sidford High Street, Sidmouth

DRAWING
 Site Boundary (OS Detail)

PROJECT NUMBER
 BLOA3007

DRAWING NUMBER 1000 **CHECKED BY** AW

REVISION 02 **STATUS** DRAFT

DATE January 2023 **SCALE** 1:2,500 @ A3



Appendix 2: Vison Document

A VISION FOR LAND AT

Sidford High Street

Sidmouth

New Homes with Public Park

AUGUST 2022



Turley

An illustration of a person riding a bicycle on a winding path through a park-like setting. The scene includes rolling green hills, a large tree on the left, a purple building in the background, and two birds flying in the sky. The person is wearing a blue shirt and purple pants. A bench and a trash can are also visible on the path.

01 The Vision

The aim of this Vision Statement is to demonstrate that the sensitive, planned development of this site, integrated with its context, can make a positive contribution to the expansion of Sidmouth.



- **A new public park for Sidmouth**
- **New sustainable homes for families and later living**
- **Integration into landscape and improved open space**
- **Connections into footpath network around Sidmouth**
- **New sustainable public connections into the AoNB**
- **Integrated biodiversity enhanced areas**

02 Key Site Benefits

- Provision of a mixed residential development together with Affordable housing for young families and later living
- Network of green space and providing a unique viewing area and access to the AoNB creating a new public park
- Biodiversity enhanced areas with SUDs integrated into the landscaping
- Community areas to include allotments and improve connections to existing facilities





Diverse habitats
achieving a net gain
in biodiversity



Sustainable Drainage
reducing the risk of
flooding



**Creating a New Public
Park**

the northern half of the
site will form new outdoor
amenity space for
residents and wildlife



New Homes

providing 180 new homes
for Sidmouth and East
Devon, some will be
affordable/older living
homes



Walkable Connections
links to Public Rights of Way
and the Sid Valley Ring Walk



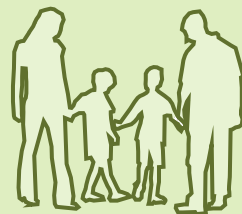
Local Retail

Waitrose and Sidmouth
Garden Centre within a
walkable distance



**Sustainable
Connections**

opportunity to provide
sustainable transport
modes



Community Facilities

easy access to Stowford
Community Centre, Sidmouth
Air Cadets and Stowford Lodge
NHS Trust

03 Planning Overview

This vision demonstrates that the Site is suitable for development and should be 'allocated' in the emerging Local Plan for the following reasons:

Site Context

The Site is located to the north of Sidmouth and north of the A3052, outside of the Sidmouth settlement boundary. It is located within an Area of Outstanding Natural Beauty (AONB). The East Devon Local Plan (adopted January 2016) identifies Sidmouth as one of the seven main towns and is therefore a sustainable location to support further growth.

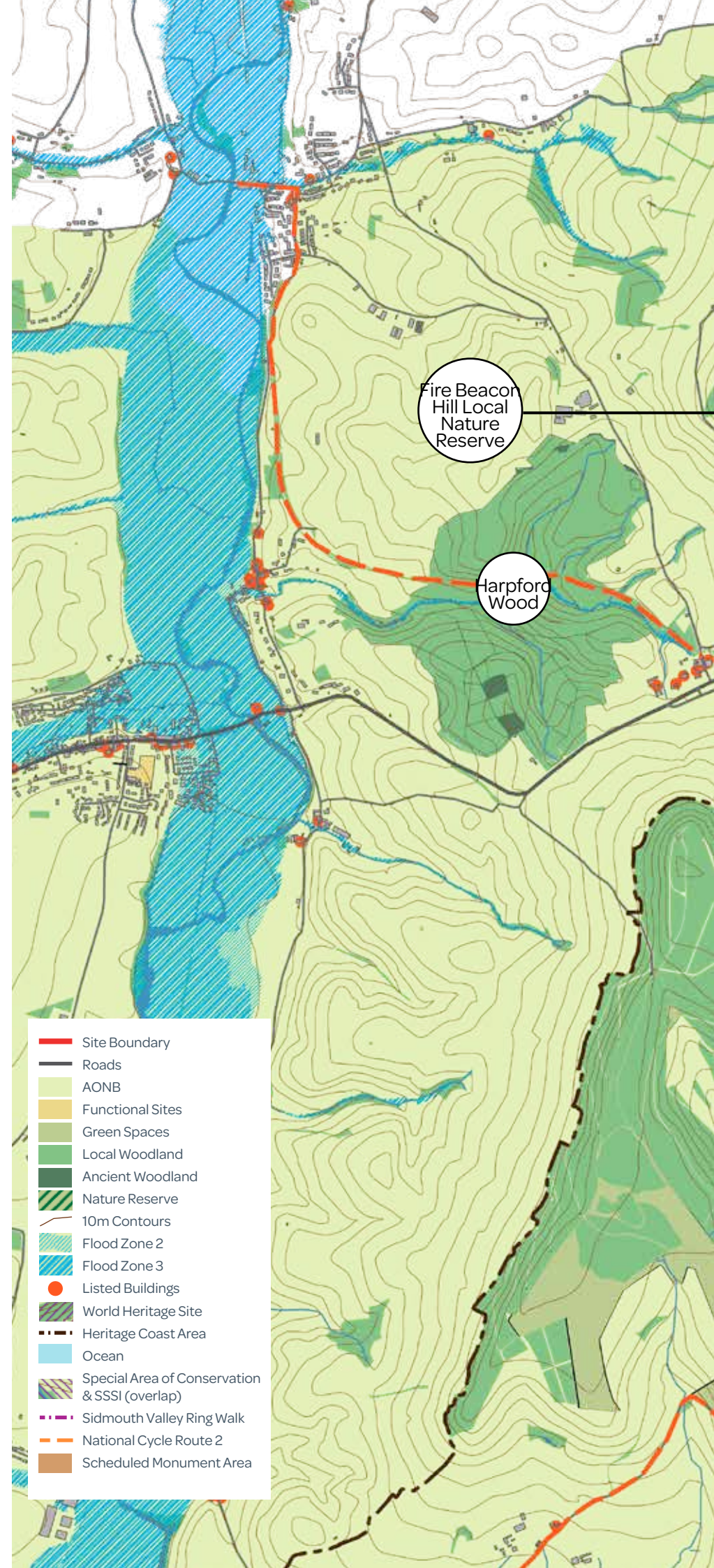
As the Sidmouth development boundary is surrounded by the designated AONB, all potential sites that will significantly contribute to future housing provision around Sidmouth are likely to be located within the AONB. It is therefore important to carefully consider sites that both positively contribute to residential development land/requirements and minimise impacts on the designated landscapes and other local environmental/policy designations.

In the emerging East Devon Local Plan, Sidmouth continues to be identified as one of East Devon's Main Centres where development will be accommodated to meet local needs.

Development Potential

This Vision Document demonstrates that the Site is suitable for development and should be allocated in the emerging Local Plan for the following reasons:

- It can deliver much needed market and affordable homes, alongside a potential mixed use area providing employment opportunities for existing and future local residents;
- The Site provides an opportunity to bring forward a variety of open space for both existing and future residents including a new public park for Sidmouth;
- Suitable vehicular access into the Site can be delivered which meets visibility and local design standards;
- There are no overriding technical or environmental constraints to the development of the Site;
- The Site is in a sustainable location being well located in relation to a good range of facilities and services that are within acceptable walking and cycling distances;
- The Site is well served by frequent bus services;
- Development can be sensitively accommodated within the Site to follow the existing settlement pattern and not cause harm to either the landscape setting or character, and;
- Harm to the AONB is mitigated by provision of new public routes and open space





Sidbury Castle

Core Hill Wood

Margaret's Meadow

Sidmouth Centre

Connaught Gardens

04 Location & Facilities

The potential development area is situated on the lower to mid-slopes of higher land to the north of the A3052, High Street, Sidmouth. The site comprises of fields bounded by hedgerows. Boundaries are curved, reflecting the landform. Land cover consists of grazing pasture and arable land.

Stowford Community Centre

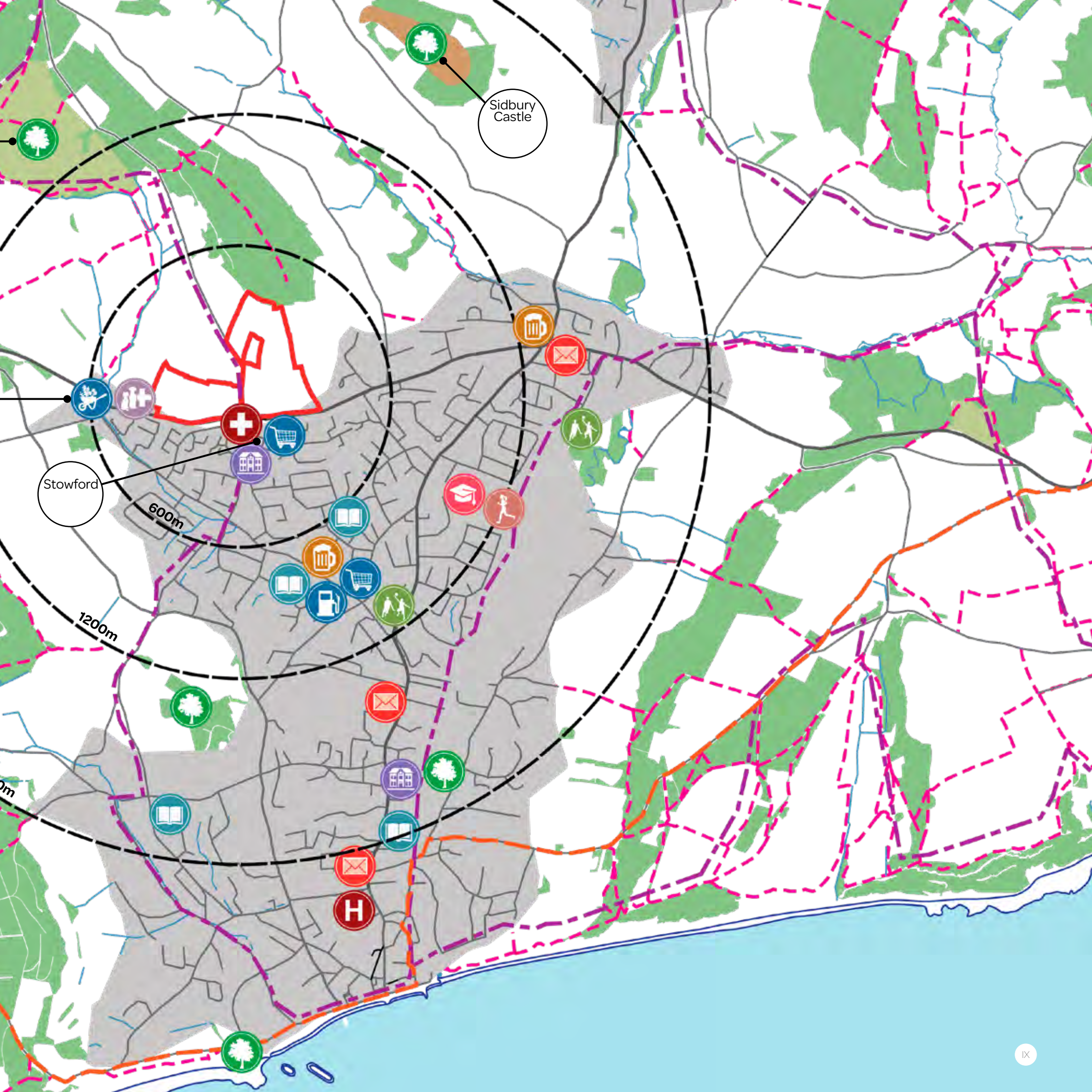
Directly south of the site, on the opposite side of Sidmouth High Street is a range of facilities including a community hall, scout hut, RAF Air Cadets, a local pharmacy, doctor's surgery and Waitrose Supermarket all within walking distance.

Sidmouth Garden Centre

This area, which is located adjacent to the western boundary, is home to a garden centre and veterinary practice. The garden centre, along with selling plants and garden supplies, hosts a popular restaurant and farmshop. Currently this site is accessed primarily by car, however there is an opportunity to provide a footpath link to this amenity through the site.



-  Medical Centre & Pharmacy
-  Hospital
-  Supermarket
-  Petrol Station
-  Schools
-  College
-  Public House
-  Veterinarian
-  Community Hall/Centre
-  Garden Centre
-  Post Office
-  Leisure Centre
-  Recreation Ground
-  Parks and Nature Reserves



Sidbury Castle

Stowford

600m

1200m

0m

05 Site Review

A review of the site and its constraints have been carefully considered and have informed the vision.

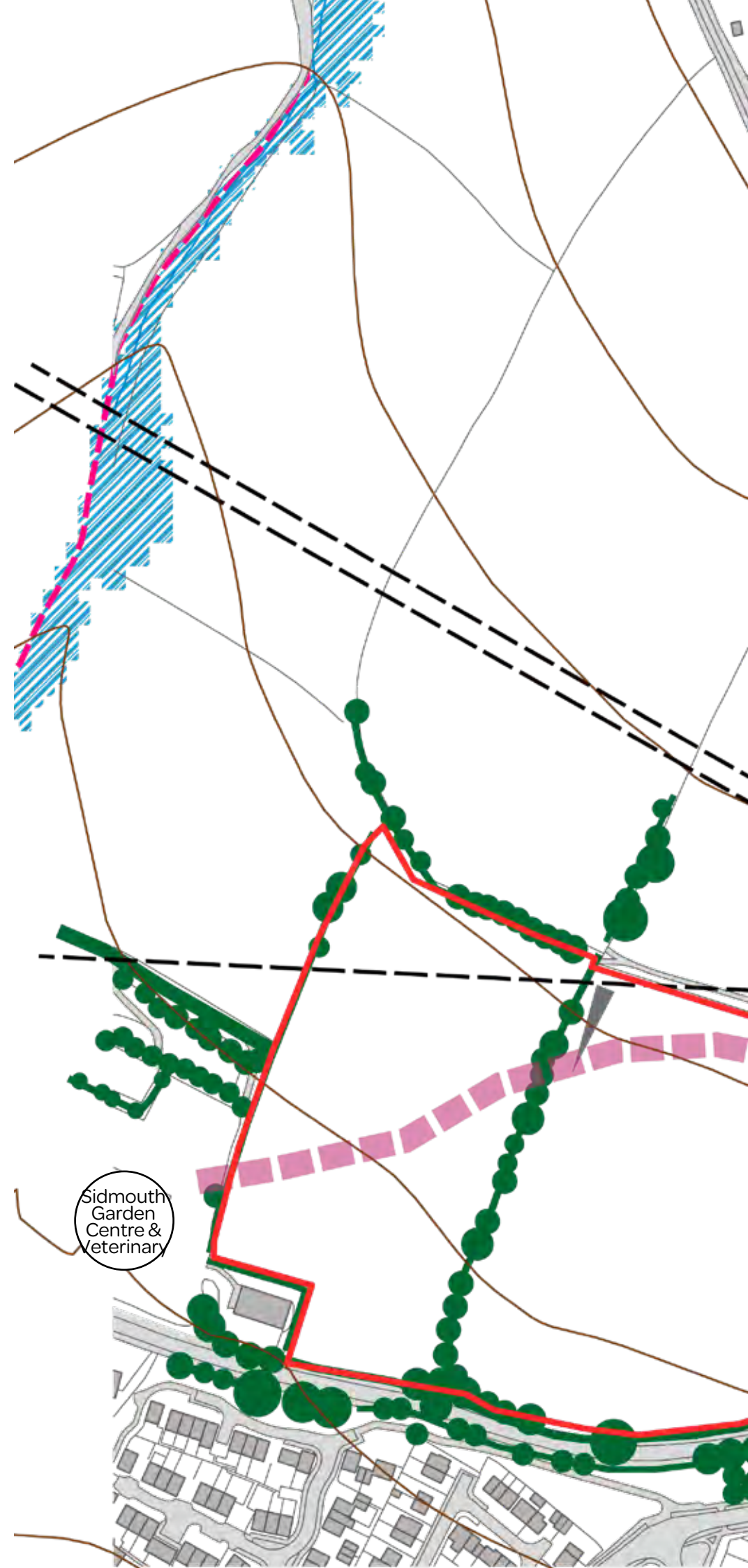
Topography

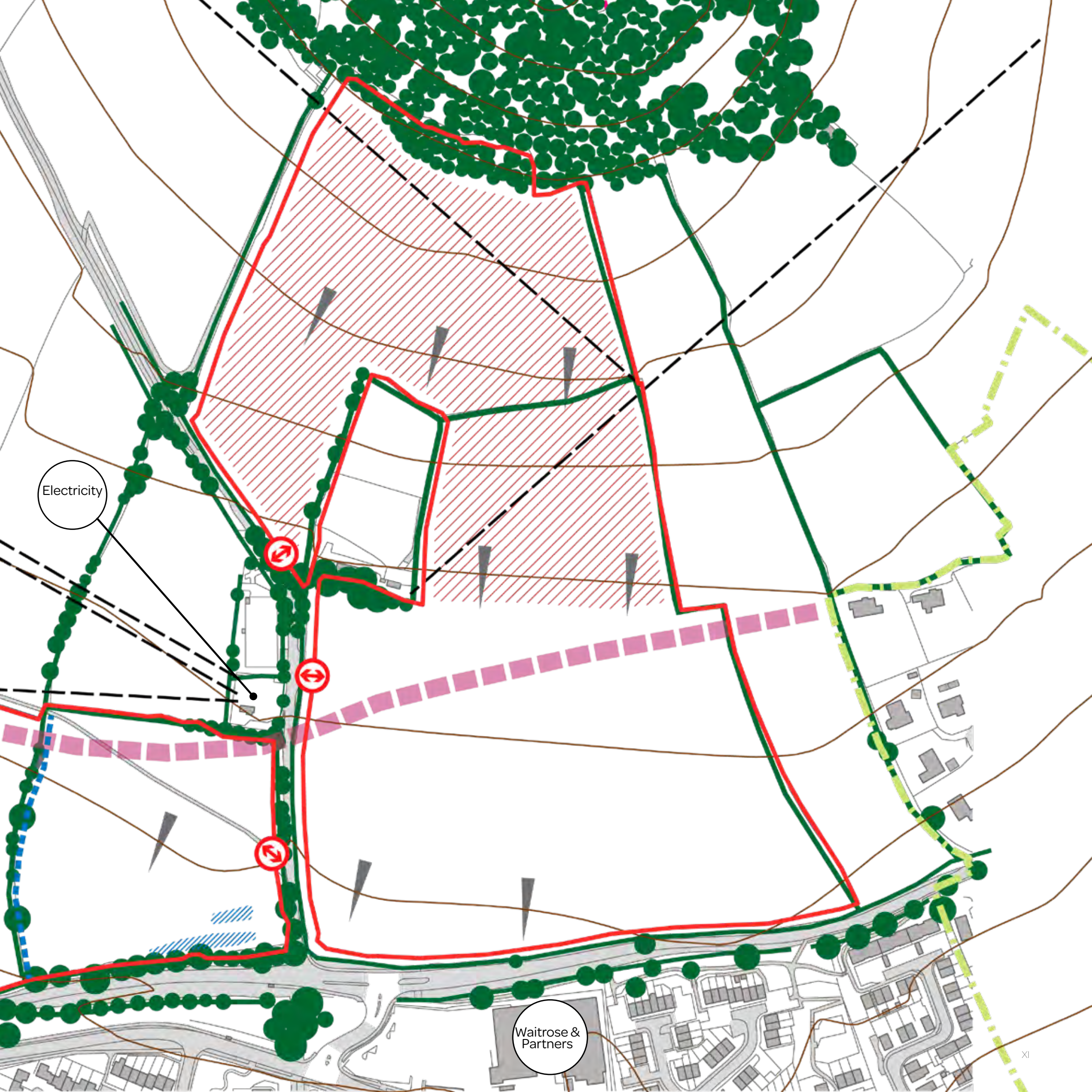
The site rises 85m from circa 70m AOD to 155m over a distance of approximately 485m. This steeply sloping landform will have a significant impact on the layout and composition of the housing.

Landscape

Due to the rising topography the upper half of the site is visually exposed making it an ideal area for the provision of a new public park with proposed residential areas limited to the southern parcels of the site below the 105m contour line. The new public park will provide long distance views from the site towards Sidmouth and the coast and will provide a facility that will be attribute for the town as a whole.

- Site Boundary
- AONB Boundary
- Existing Trees & Hedgerows
- Existing Access Points
- Power Lines
- 10m Contours
- Indicative Urban Edge
- Existing Dry Ditch
- Surface Water Flood Risk
- Areas Exposed to Long Distance Views





Electricity

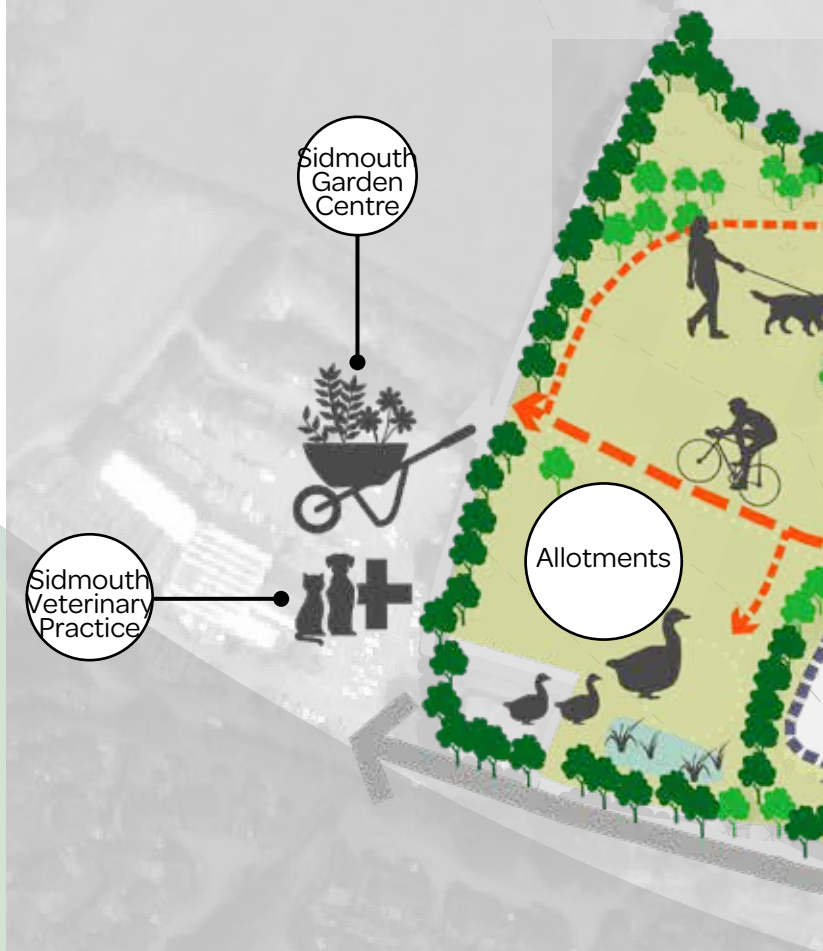
Waitrose & Partners

06 The Opportunity

Land at Sidford High Street

This site has the opportunity to deliver homes within a sensitively designed environment featuring a new public park with new play areas, allotments and nature parkland. The provision of new open space responds to the landscape conditions and seeks to provide new habitats for wildlife as well as tree and meadow planting with the intention of delivering a biodiversity net gain across the site. Two new play areas and a grouping of allotments are proposed to provide new amenities are existing as well as new residents.

The site is well-placed between a number of key local facilities including a supermarket, pharmacy, medical centre, community hall and garden centre all of which are within walking distance. The Sid Valley Ring Walk runs through the site along Core Hill Road, there is an opportunity to reinforce this road as a recreational walking route.





Core Hill Wood

Sid Valley Ring Walk

New Public Park

Unleashed Dog Park

Electricity Sub-Station

Later Living

Stowford Lodge NHS Trust



Stowford



Waitrose and Partners

07 Design Principles



Land Use

- Retirement housing provided within the western parcels of the development.
- Low density housing to be provided along the green edge fronting the proposed parkland to the north,

Green and Blue Infrastructure

- Public Open Space proposed within the northern half of the site with new public park.
- Sustainable drainage features to be located at the lowest points of the site, to provide surface water attenuation and mitigate flooding risk.



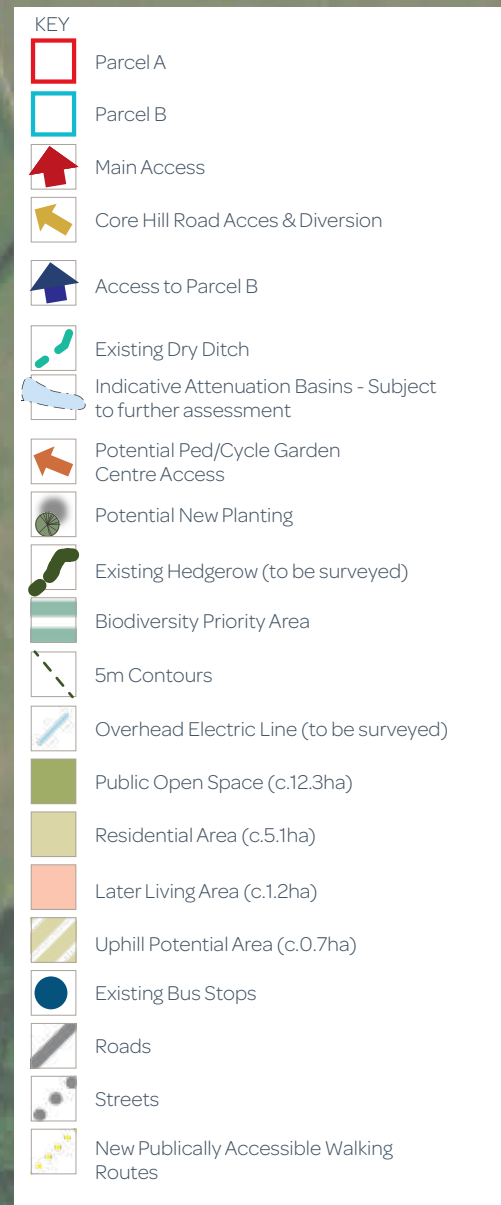
Connections

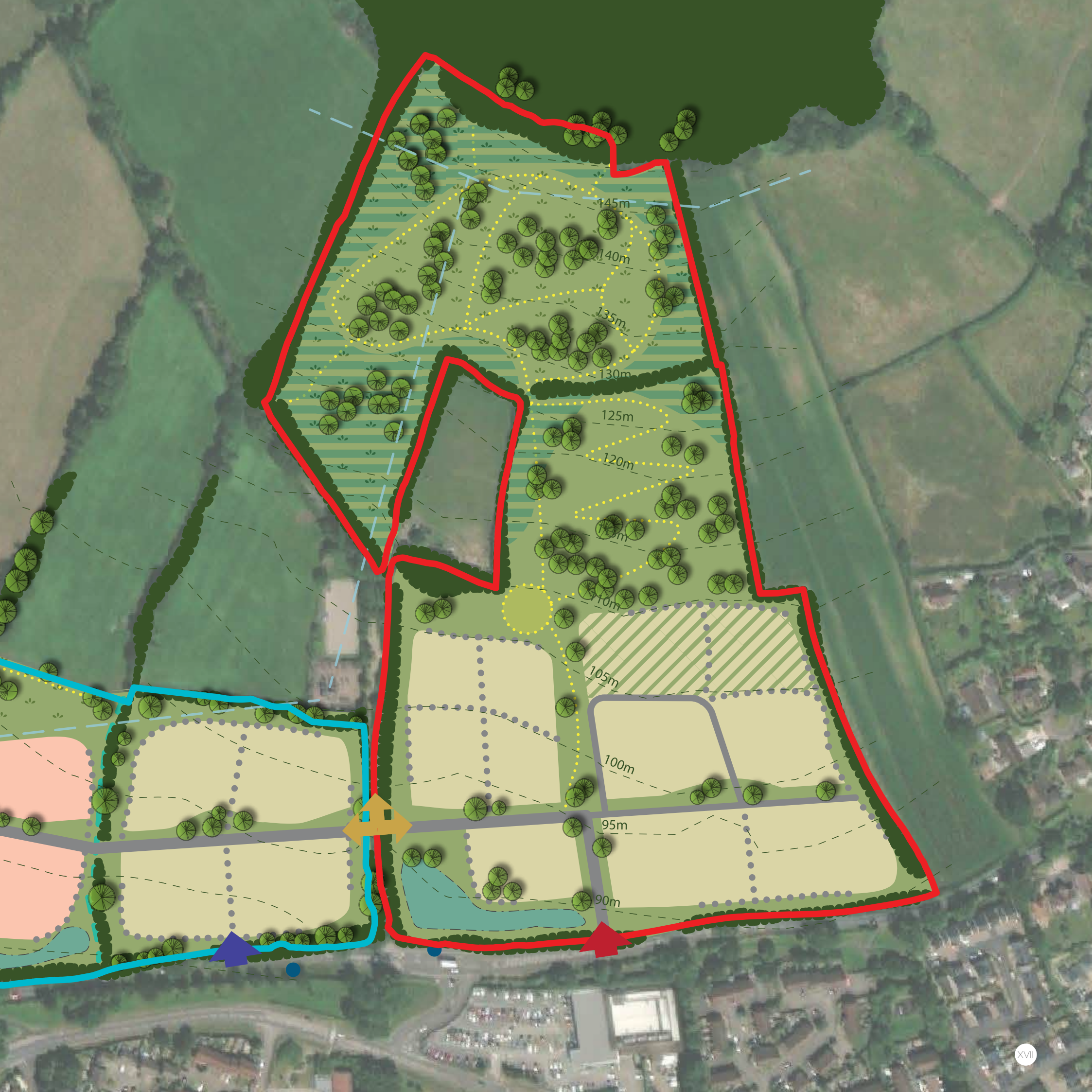
- Primary access proposed from Sidford High Street - A3052 via a new T-junction.
- Pedestrian and cycle access provided through the site to Sidmouth Garden Centre.
- Entrance to Core Hill Road retained as a pedestrian and cycle route, vehicular access will be provided via the site's internal road network.

08 Framework Masterplan

Development Strategy

- Indicative main access points taken from A3052 High Street
- Create pedestrian links through the site with a clear street hierarchy for other movement modes
- Development footprint kept below the 105m contour line
- The public open space strategy includes the creation of a new public park for Sidmouth that will retain a significant proportion of land and create a facility and attribute for residents of Sidmouth as whole. It will also soften the visual impact of development in views from the North within prominent parts of the AONB. Areas of parkland that incorporate meadow grassland, as well as central open space for orchard or allotments will be included. Natural play will be integrated within the open space.
- Additional planting to be provided within Public Open Space to screen development on lower ground
- To be reviewed but potentiality an additional parcel of 0.7ha above the 105m contour line aligning with the existing development edge to the east which is very low density
- Retain green infrastructure where possible and enhance planting along the boundaries and within the open space. Provide a green spine through the site that could accommodate SUDs and landscape planting to screen and blend development further up the hill





For further information contact

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Turley

Appendix 3: Landscape Technical Note

Land at Sidford High Street, Sidmouth (EDC Ref. Sdm_02 and Sidm_35) Landscape Technical Note edp7709_r001a

1. Introduction

1.1 This Technical Note has been prepared by The Environmental Dimension Partnership Ltd (EDP) on behalf of Bloor Homes Limited. It provides landscape evidence to support the allocation of Land at Sidford High Street, Sidmouth (East Devon Council reference Sidm_02 and Sidm_35) for residential development in the emerging East Devon Local Plan.

1.2 The extent of land to which this Technical Note refers (hereafter referred to as the 'Site') is illustrated on **Plan EDP 1**. With reference to the Regulation 18 Consultation Draft Local Plan¹, the Site includes:

- Sidm_02, which covers the western portion of the Site and is currently rejected for allocation based upon landscape impacts; and
- Sidm_35, which covers the eastern portion of the Site and is currently rejected for allocation based upon landscape impacts.

1.3 The Council's decision to reject Sidm_02 is documented in Site Selection Report (September 2022)². **Appendix EDP 2** of this report includes a more detailed assessment, however, the Summary Commentary for of Sidm_02 reads as follows:

"Development of the site (124 max yield) would have a high landscape impact (Site within AONB with high intervisibility), no heritage impact but a significant adverse effect on ecology. There is good access to facilities and employment but poor existing access via a narrow lane onto the A3052. Adjacent site to east has come forward as part of call for sites (2022). The combination of Sidm_02 and the newly submitted 'land north of Sidford High Street to the east of site reference Sidm_02' has potential for significant delivery of housing, however it would require an improved access to A3052, and appropriate ecological mitigation. The impact on the landscape of the AONB is however a significant concern."

1.4 A key part of the evidence base used in the site assessment is the Sustainability Appraisal (SA) report which accompanies the Consultation Draft Local Plan³. All sites around Sidmouth, which fall within the area of outstanding natural beauty (AONB) score a double negative (including the proposed allocation of Sidm_01), based on the following commentary

¹ East Devon Local Plan 2020 to 2040. Preferred Options Reg. 18 Consultation Draft Plan. Current draft - autumn 2022

² Report to Strategic Planning Committee. Site Selection for the emerging East Devon Local Plan 2020 to 2040 – interim findings at Tier One and Tier Two settlements. 06 September 2022.

³ East Devon Local Plan 2020-2040 – Preferred Options consultation draft Sustainability Appraisal report, November 2022

“East Devon AONB both surrounds and also features within the BUAB of Sidmouth. This special landscape is a significant constraint on development. With the exception of sites Sidm_12, 20, 22 and 28, all sites are set entirely within the AONB, with varying levels of intervisibility and impact. Whilst Sidm_01 is set adjacent to built-up areas, and is better screened than alternative sites situated on high ground, the site remains sensitive to development.”

- 1.5 The remainder of this Note presents further evidence in respect of landscape, to challenge the Council’s current position regarding the suitability of the Site for development.

The Site

- 1.6 The Site lies at the northern edge of Sidmouth, the Site area, as illustrated at **Plan EDP 1** and **Plan EDP 2** and **Plan EDP 3** is evidently on greenfield land beyond the built limits of Sidmouth. It should be noted, however, that with considered masterplanning, development would relate well to the existing settlement edge to the east and south.
- 1.7 The site is currently agricultural land. Where historic field parcels remain, they are divided by well-established hedgerows and hedgerow trees. The mature, densely vegetated field boundaries at the periphery in combination with a lower rolling topography (comparable to other developed land within Sidmouth and the AONB (**Plan EDP 4**), act to contain parts of the Site and reduces intervisibility with the wider landscape. Furthermore, the more exposed portions of the Site to the north, would be well placed to provide extensive public access to provide new viewing and recreational opportunities as well as biodiversity net gain (BNG). As the majority of the Site comprises habitats of intrinsically low value, together with the significant opportunities that exist for habitat creation/enhancement as part of a landscape-led sensitive masterplan the development can provide a net gain in biodiversity without the need for off-site enhancement.

2. Landscape Matters

Review of Evidence

- 2.1 As noted above, a key part of the evidence base used in the site assessment is the SA report which accompanies the Consultation Draft Local Plan. A summary of the pertinent conclusions of the SA report for all the sites around Sidmouth is presented above.
- 2.2 As all the sites are within the AONB, is considered that mitigation is likely to be difficult with no detailed additional commentary provided in terms of the potential development capacity in landscape terms.
- 2.3 On this basis, the Council’s SA gives the site a double negative score according to the methodology employed in the SA, a double negative score indicates the:

“Site has medium to high or high sensitivity in landscape/seascape terms and/or is within an AONB. Mitigation likely to be difficult.”

- 2.4 In relation to landscape matters, the HELAA considers the site as part of Sidm_02 and Sidm_35 in landscape terms as follows:

“Located entirely within East Devon AONB, on rising land north of Sidmouth. Comprised of three fields with mature hedgerow. Mature trees along southern boundary limit short-distance views into site adjacent A3052, but many medium-long distance views into site, including from elsewhere in the AONB. The edge of Sidmouth adjacent to south provides some context of built form when viewing the site.”

and

“Whole site falls in East Devon AONB LCT ref 3 a: Upper farmed and wooded valley slopes.”

- 2.5 It should be noted, however, that the HELAA identifies that development of the site **would not** have an unacceptable impact on landscape as result of either residential or commercial development.
- 2.6 Clearly, being within the AONB itself does not present an in-principal constraint to development of the Site, as the HELAA identifies that development of the Site **would not** have an unacceptable impact on landscape as result of either residential or commercial development, merely that any development would need to respond to the Site's context. Furthermore, it is proposed that Sidm_01 (also scoring a double negative due to it's location within the AONB) is progressed for residential development.
- 2.7 It should be noted that parts of the Site are consistent in topographic context to the existing settlement of Sidmouth, which also has intervisibility with large parts of the AONB due to the wider topographic context of Sidmouth as illustrated by **Plan EDP 3**. Therefore, more detailed consideration of the Site's capacity in landscape terms and the balance of any potential adverse of beneficial effects is required prior to the allocation of any sites.
- 2.8 At present, the whole of the Sidm_02 and Sidm_35 have been discounted on landscape grounds, for which, there is no evidence of any assessment of the impact beyond the same double negative score achieved by Sidm_01 for being within the AONB. There is no more substantive and site-specific assessment and consideration of development proposals.

Site Appraisal

- 2.9 In light of the above, EDP has undertaken a high-level review of the Site in relation to its landscape and visual context. This is based on a desktop review and a site visit. This identifies that, in the context of the proposed allocated of Sidm_01, the landscape and visual considerations do not warrant exclusion of Sidm_02 and Sidm_35 on landscape grounds.
- 2.10 Consideration of the spatial relationship between the parcels and the existing settlement will be important for any development around the settlement of Sidmouth, as will the landscapes' role in the AONB. The southern and easternmost parcels have the benefit of lying directly adjacent



to the existing settlement edge, furthermore, development is not proposed to extend to the full northern extent. Considered masterplanning has ensured sufficient land is included to achieve a comprehensive scheme (including the aspirations for wider public benefit in terms of access to the AONB and BNG). As a result, the development would provide a 'new' and permanent settlement edge to the north of Sidmouth, much of which can be softened and/or contained by an appropriate landscape scheme.

2.11 Spatially, where development is proposed, the Site links well to the existing movement network and the existing settlement, as illustrated by **Plan EDP 2**.

2.12 In relation to landscape matters, the submitted concept masterplan illustrates the Site's development considerations and therefore capacity (and it's inter-relationship with sensitivity), which can be summarised as follows:

- Due to its location and context development can be sensitive to the existing road patterns and settlement form;
- Development wouldn't be an uncharacteristic protrusion materially extending the visual envelope of the settlement, nor would it result in ribbon development, it would sit well between the High Street, Sidmouth Garden Centre and the existing settlement edge to the east;
- The proposals have had careful consideration of the impacts of proposed development on upper slopes, to limit the impact of views to and from other areas within the AONB, furthermore, the proposals provide extensive new areas of viewing opportunities to be celebrated;
- The inclusion of extensive areas of open space would assist in integrating the new development into the wider landscape;
- The extent of development to the north is restricted to avoid a linear form of development extending up the slope to the north; and
- Considered development would respond to the role of the Site in medium to long distance views and celebrate views into and across Sidmouth from areas of attractive open space, achieving extensive areas of BNG and a network of recreational routes.

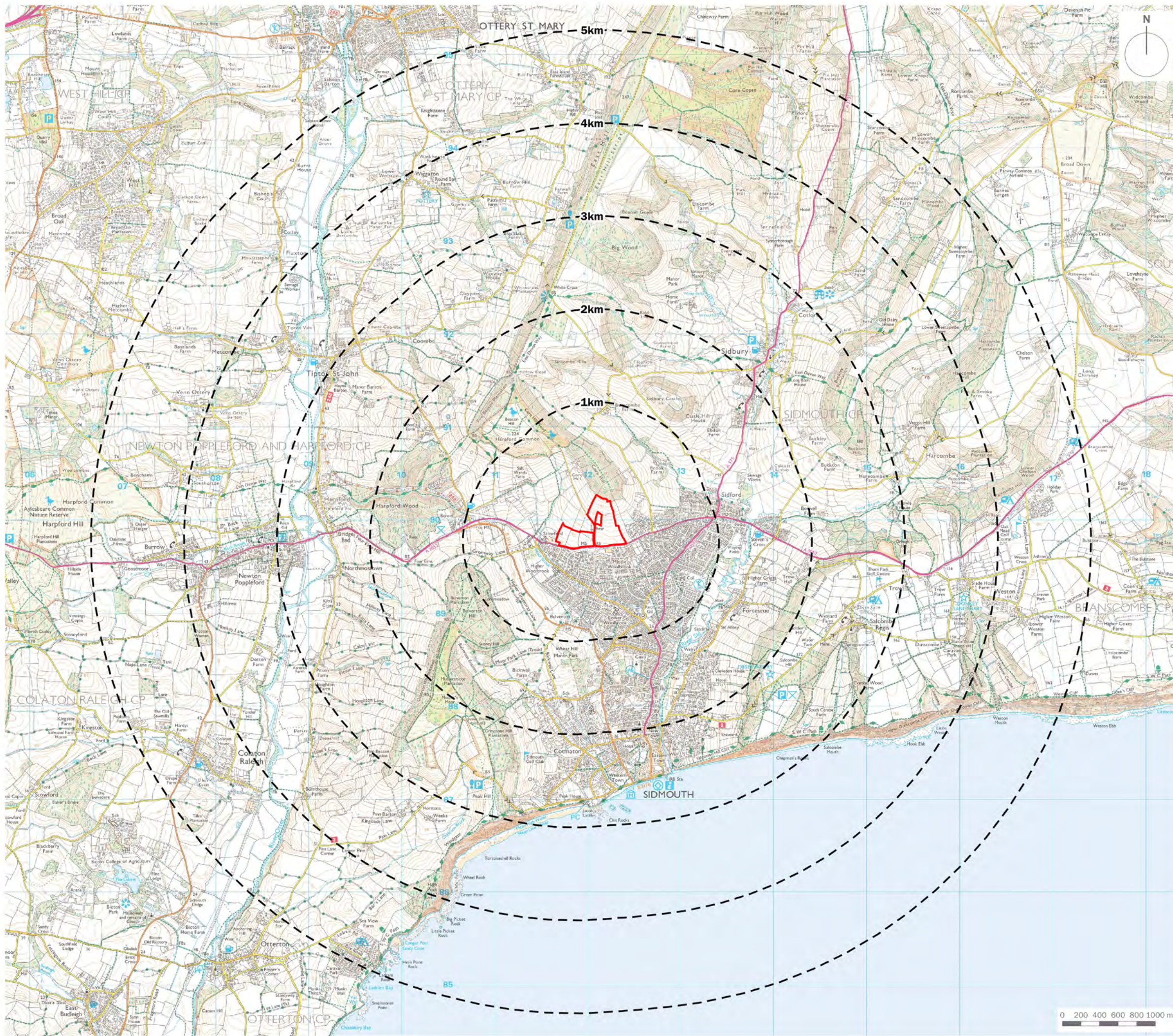
Landscape Conclusions

2.13 In the context of allocating land within the AONB around Sidmouth, given the site-specific commentary above, there is no reason to believe that landscape matters would result in any unacceptable or major negative impacts which could not be mitigated through sensitive masterplanning.

-
- 2.14 There is no reason, nor any objective assessment within the evidence base to preclude the Site's allocation for residential development.
- 2.15 In that respect, it may be the case that the 'potential' impacts of development on landscape character and visual amenity may bear upon the Site's capacity (as illustrated above and within the submitted concept masterplan), but there is no reason to believe or expect that they would preclude or restrict its deliverability in line with the relevant national and local planning policy framework.
- 2.16 Accordingly, it is considered that the exclusion of Sidm_02 and Sidm_35 from the Local Plan as a draft residential allocation is considered to be pre-emptive and unjustified, on the basis that there is not currently any evidence to demonstrate that impacts on landscape matters arising from its development could not be avoided or minimised through the application of detailed design measures, the principles of which are discussed above and illustrated with the submitted material.
- 2.17 Further, it is also unclear as to why Sidm_02 and Sidm_35 have been discarded on landscape grounds considering the similar 'score' and 'evidence' for the council's own evidence of other preferred options in the Draft Local Plan (Sidm_01).



Plan EDP 1
Site Location and Boundaries
(edp7709_d001a 12 January 2023 GYo/WGa)



- Site Boundary
- Range Rings (at 1km intervals)

client
Bloor Homes Limited

project title
Land at Sidford High Street, Sidmouth

drawing title
Site Location and Boundaries

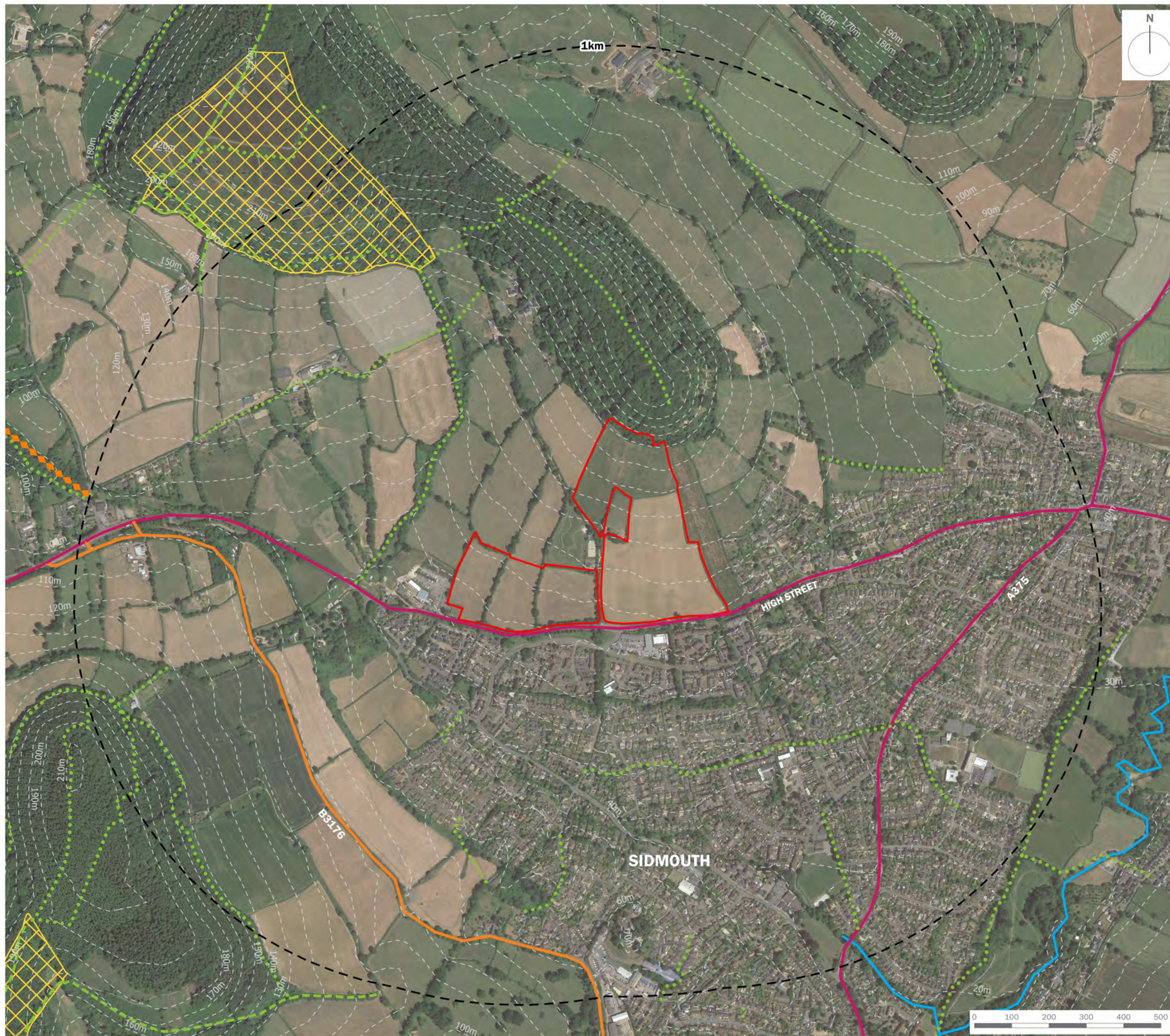
date **12 JANUARY 2023** drawn by **GYo**
drawing number **edp7709_d001a** checked **WGa**
scale **1:40,000 @ A3** QA **JFr**



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Plan EDP 2
Site Character and Local Context
(edp7709_d002a 12 January 2023 GYo/WGa)



- Site Boundary
- Range Rings (at 1km intervals)
- Contours (at 10m intervals)
- Watercourses
- Open Access Land (CRoW Act 2000)
- National Cycle Network
- A Road
- B Road
- Public Rights of Way (PRoW)
- Footpath
- Bridleway

client	Bloor Homes Limited	
project title	Land at Sidford High Street, Sidmouth	
drawing title	Site Character and Local Context	
date	12 JANUARY 2023	drawn by GYo
drawing number	edp7709_d002a	checked WGa
scale	1:10,000 @ A3	QA JFr

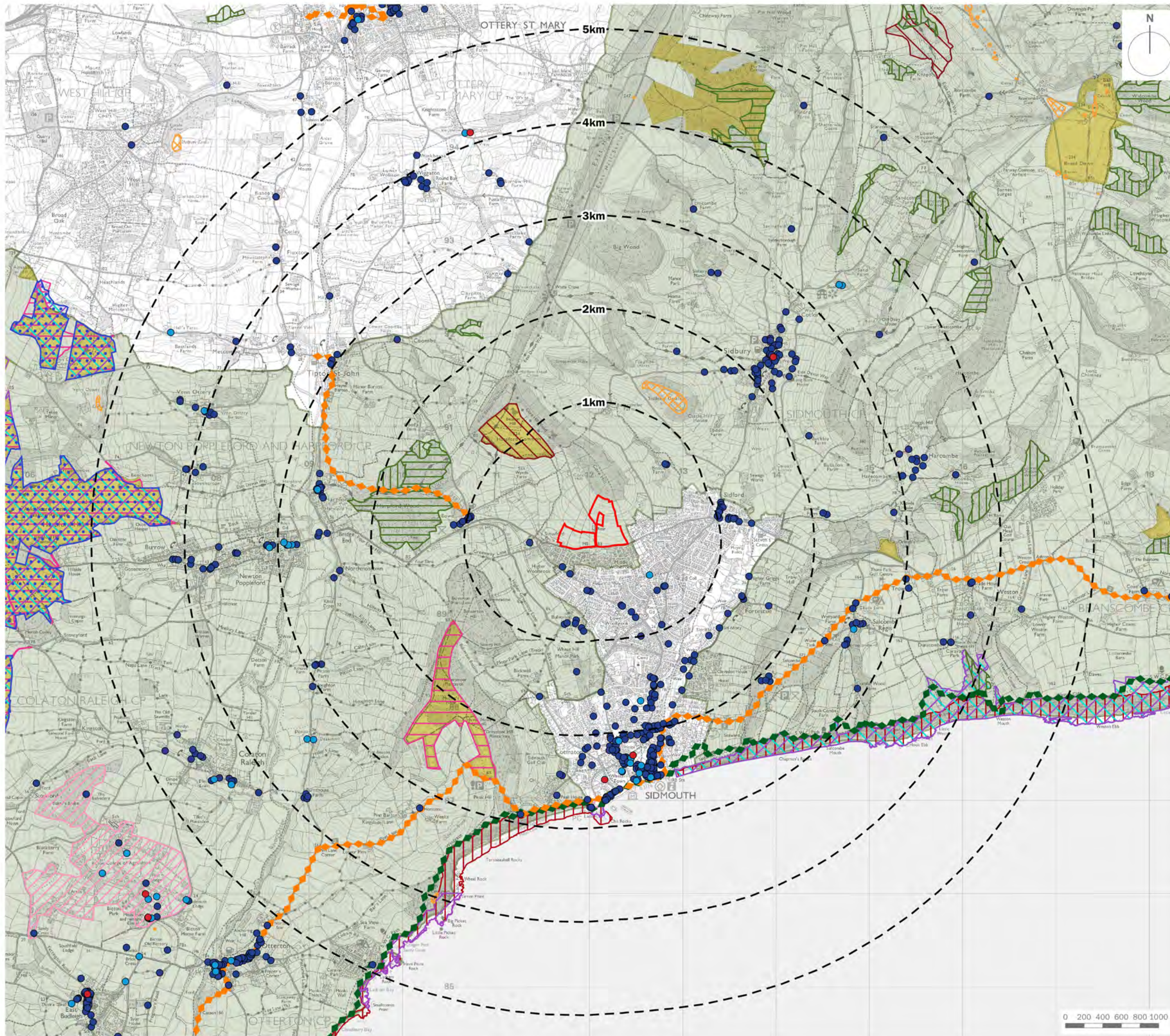


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Land at Sidford High Street, Sidmouth (EDC Ref. Sdm_02 and Sidm_35)
Landscape Technical Note
edp7709_r001a



Plan EDP 3
Environmental Planning Context
(edp7709_d003a 12 January 2023 GYo/WGa)



- Site Boundary
- Range Rings (at 1km intervals)
- Landscape**
- Area of Outstanding Natural Beauty (ANOB)
- Open Access Land (CRoW Act 2000)
- National Cycle Network
- National Trail
- Ecology**
- Special Protection Area (SPA)
- Special Area of Conservation (SAC)
- Site of Special Scientific Interest (SSSI)
- National Nature Reserve
- Local Nature Reserve
- Ancient Woodland Inventory**
- Ancient Semi-natural Woodland
- Plantation on Ancient Woodland Site
- Heritage**
- World Heritage Site
- Registered Park and Garden
- Scheduled Monument
- Grade I Listed Building
- Grade II* Listed Building
- Grade II Listed Building

client

Bloor Homes Limited

project title

Land at Sidford High Street, Sidmouth

drawing title

Environmental Planning Context

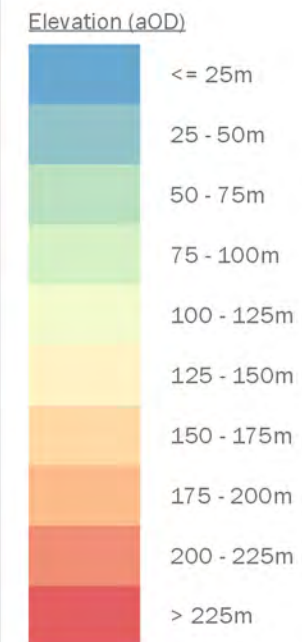
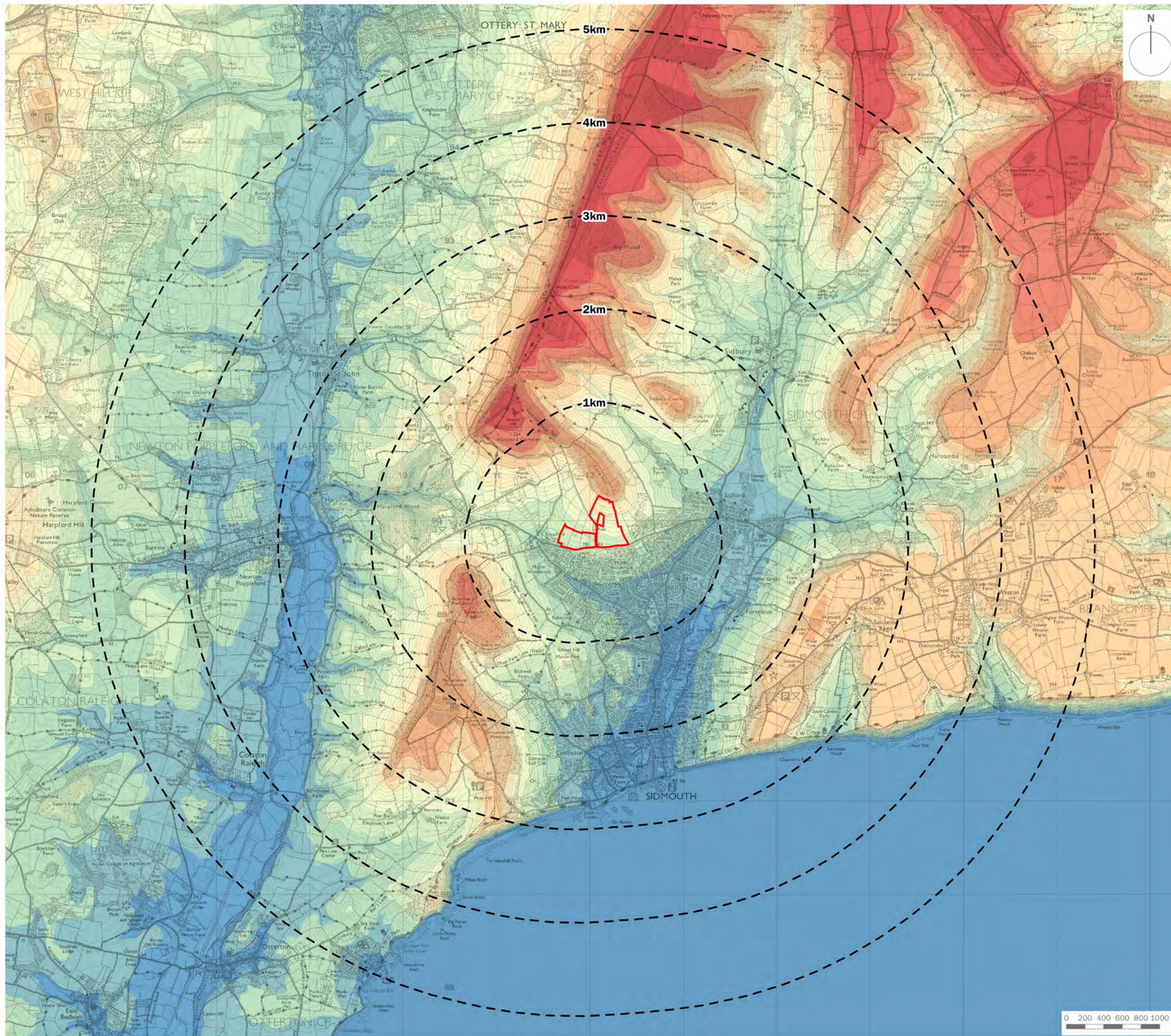
date	12 JANUARY 2023	drawn by	GYo
drawing number	edp7709_d003a	checked	WGa
scale	1:40,000 @ A3	QA	JFr



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Plan EDP 4
Topographic Context
(edp7709_d004 12 January 2023 GYo/WGa)



client
Bloor Homes Limited

project title
Land at Sidford High Street, Sidmouth

drawing title
Topography Plan

date	12 JANUARY 2023	drawn by	GYo
drawing number	edp7709_d004	checked	WGa
scale	1:40,000 @ A3	QA	JFr



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Appendix 4: Concept Masterplan

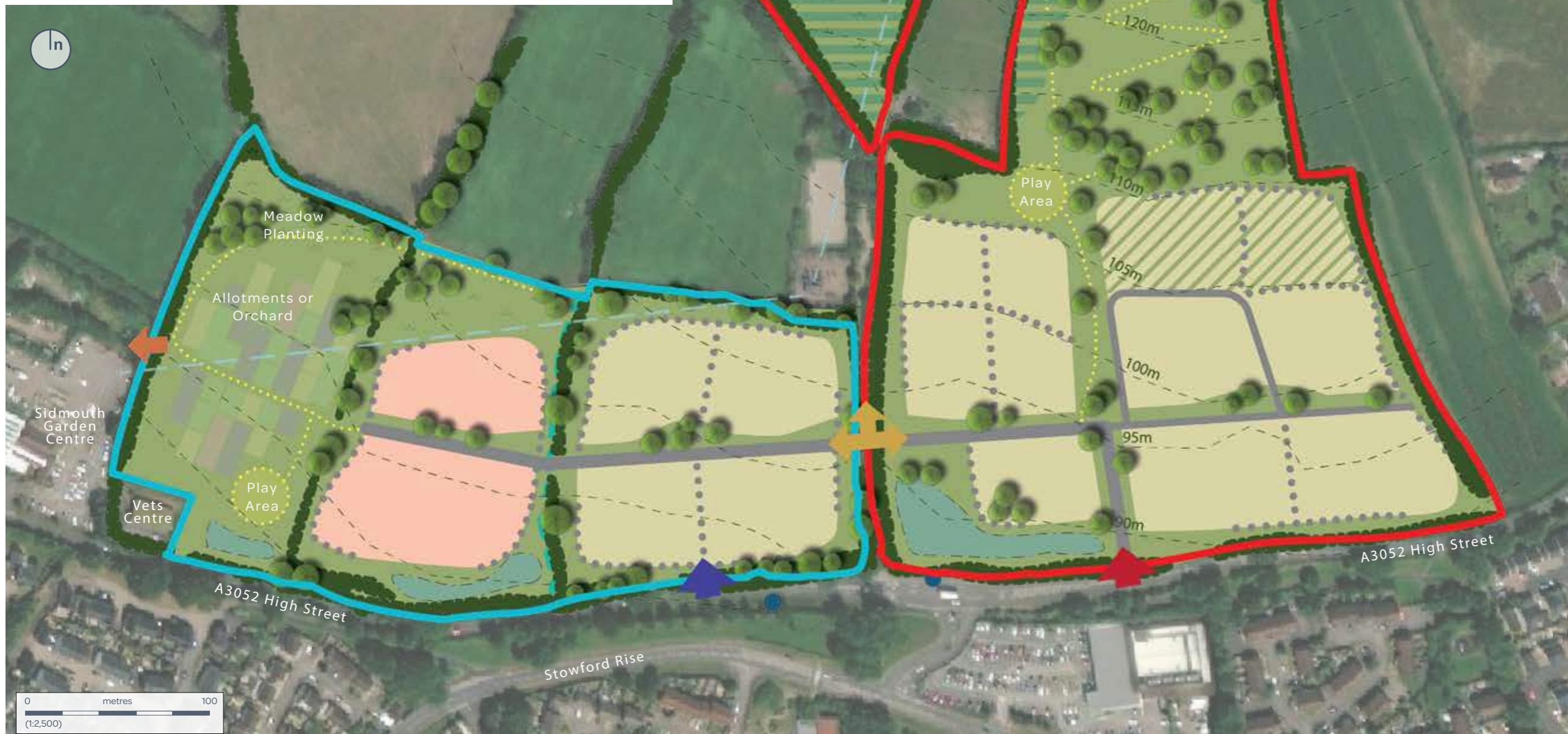
Development Strategy (subject to technical input)

- Indicative main access points taken from A3052 High Street, subject to detailed engineering advice
- Create pedestrian links through the site with a clear street hierarchy for other movement modes
- Development footprint kept below the 105m contour line. Subject to subject to LVIA advice and input. Additional planting to be provided within Public Open Space to screen development on lower ground.
- To be reviewed but potentiality an additional parcel of 0.7ha above the 105m contour line aligning with the existing development edge to the east which is very low density.
- Retain green infrastructure where possible and enhance planting along the boundaries and within the open space. Provide a green spine through the site that could accommodate SUDs and landscape planting to screen and blend development further up the hill.
- The public open space strategy may need to retain a significant proportion of land to create areas that soften the visual impact of development in views from the North within prominent parts of the AONB (specific landscape impact advice would be required to inform this). Areas of parkland that incorporate meadow grassland, as well as central open space for orchard or allotments. Natural play will be integrated within the open space. (Total POS: 12.3ha).
- Net Developable Area 6.3ha comprising:

	Parcel A	Parcel B	Density	No. of Homes
Site Area	12.45ha	6.89ha		
Net Developable Area	3.40ha	2.90ha		
Residential Area	3.40ha	1.70ha	30dph	153du
Later Living Area	-	1.20ha	25dph	30du
Potential Additional Area*	0.70ha	-	20dph	14du

* Potential 0.7ha uphill addition to net developable area above 105m contour.

Please note the above figures are based on high level design principles and subject to detail review and assessment by various disciplines. We recommend assessments on the following; drainage, landscape, ecology, access & highways, ground conditions and utilities.



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KEY

- Parcel A
- Parcel B
- ↑ Main Access
- ↔ Core Hill Road Access & Diversion
- ↑ Access to Parcel B
- ~ Existing Dry Ditch
- ~ Indicative Attenuation Basins - Subject to further assessment
- ↔ Potential Ped/Cycle Garden Centre Access
- Potential New Planting
- ~ Existing Hedgerow (to be surveyed)
- Biodiversity Priority Area
- 5m Contours
- Overhead Electric Line (to be surveyed)
- Public Open Space (c.12.3ha)
- Residential Area (c.5.1ha)
- Later Living Area (c.1.2ha)
- Uphill Potential Area (c.0.7ha)
- Existing Bus Stops
- Roads
- Streets
- ~ New Publically Accessible Walking Routes

CLIENT:

Bloor Homes

PROJECT:

Land at Sidford High Street, Sidmouth

DRAWING:

Concept Masterplan - Alternative Option

PROJECT NUMBER:

BLOA3007

DRAWING NUMBER:

3003

CHECKED BY:

SM

REVISION:

-

STATUS:

DRAFT

DATE:

August 2022

SCALE:

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Appendix 5: Sustainable Transport and Access Strategy Note

SUSTAINABLE TRANSPORT AND ACCESS STRATEGY

Land at Sidford High Street, Sidmouth

Bloor Homes



Land at Sidford High Street, Sidmouth

Bloor Homes

QA RECORD:

DOCUMENT REF	7894-TR01	Rev	1.0
DRAFTED BY	Linda Kulahcigil	Date	17 August 2022
CHECKED BY	Chris Brooke	Date	17 August 2022
APPROVED BY	David Knight	Date	17 August 2022
ELECTRONIC LOCATION	B:\Projects\7894 Sidford High Street, Sidmouth\Deliverables\Reports\7894 Sustainable Transport And Access Strategy V1.1.Docx		

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Drawings

7894-001 Sidford Access Proposal	
7894-002 Sidford Access Proposal – Vehicle Tracking	
7894-IAO1-Walking Isochrone	
7894-ISO2-Cycling Isochrone	
7894-ISO3-Public Transport Isochrone	

1 INTRODUCTION

1.1 Background

1.1.1 This Transport Access and Review Report has been prepared by NRP on behalf of Bloor Homes to support the promotion of residential development on land at Sidford High Street, Sidmouth.

1.2 Proposed Development Site

1.2.1 The proposed development site is located to the north of the A3052 Sidford High Street on the northern edge of Sidmouth. It is bounded to the east by Core Hill Road and to the west by a Garden Centre and Vets practice. This site comprises of three fields that rise up from the main highway to Core Hill and an additional field to the east of Core Hill.

1.2.2 The site location is shown in **Figure 1.1**.

Figure 1.1: Site Plan



1.3 Structure of the report

1.3.1 This Transport Access and Review Report is set out as follows:

- Chapter 2 provides a summary of baseline conditions including a description of the highway network, a review of the pedestrian environment, details of existing bus services and details of local cycling opportunities;
- Highway access opportunities are described in Chapter 3 together with the recommended access proposals;
- Chapter 4 considers the sustainability of the proposed site in relation to transport;
- Chapter 5 presents a summary and conclusions.

2 EXISTING TRANSPORT CONDITIONS

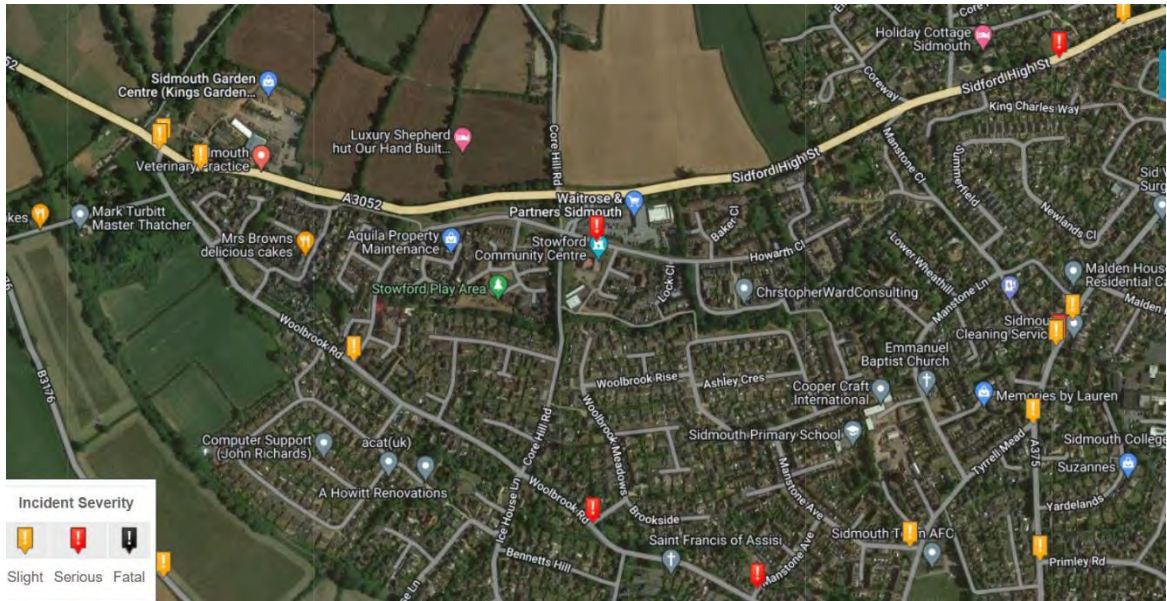
2.1 Highway Network

- 2.1.1 The A3052 is a main road that links Lyme Regis with Exeter and runs through a number of East Devon coastal towns including Sidmouth. It runs through Sidford in the northern part of the town and forms High Street. 1.2km east of the site, Sidford High Street meets the A375 Sidford Road and School Street at a staggered traffic signal controlled junction. West of this junction the A3052 is typically 5.5 to 6.0 metres wide and subject to a 30mph speed limit. This increases to 40mph as one travels westbound on the approach to the Waitrose Supermarket approximately 200 metres east of the junction with Core Hill Road.
- 2.1.2 To the north of the A3052, Core Hill Road is a narrow lane approximately 3 metres wide which serves the eastern field of the proposed site, the western field of the proposed site and a few other properties before continuing further north to join a network of other minor roads. Immediately south of the A3052 Core Hill Road has been closed to vehicular traffic over the 60 metre section to Stowford Rise. To the south of Stowford Rise, Core Hill Road continues to join Woolbrook Road. There is no road junction between Stowford Rise and Core Hill Road.
- 2.1.3 The A3052 Sidford High Street/ Core Hill Road junction is a ghost island priority T-junction which forms part of a left-right stagger junction with a short link road to Stowford Rise. This junction is described further in Chapter 3.
- 2.1.4 To the west of the Core Hill Road junction, the A3052 is 8.2 metres wide and drops away to a tight right hand bend which is some 250 metres from the junction. This is followed by a 230 metres long section that is typically 6 metres wide to the junction with Sidmouth Garden Centre on the north side of the road. As you travel westbound there are left and right hand bends before you reach the junction of Woolbrook Road. The length of this section of highway is 160 metres.
- 2.1.5 The A3052/Woolbrook Road junction is a simple priority junction with visibility to the right for vehicles leaving Woolbrook Road restricted to 80 metres. This junction forms the western boundary of the urban area. Woolbrook Road is between 6.5 and 8 metres wide and there is a tight left hand bend as you travel away from the A3052. Further along Woolbrook Road are the junctions with Stowford Rise and Core Hill Road. Eventually Woolbrook Road enters a 20mph zone and joins Arcot Road which joins Sidford Road.
- 2.1.6 Stowford Rise is 6.8 to 7.3 metres in width and provides access to residential areas and a Waitrose supermarket. New houses are being constructed at the eastern end of this road.

2.2 Road Safety

- 2.2.1 Recorded Personal Injury Collisions (PICs) on the local highway network for the five year period 2017 to 2021 have been examined. The locations of these are shown on Figure 2.1. Yellow represents PICs of a slight severity, red is severe and black is Fatal. There have been no Fatal PIAs in the vicinity of the site.
- 2.2.2 The A3052 Sidford High Street has a good collision record with no PICs in the vicinity of the proposed site. There is a small cluster of slight PICs which have occurred at the Woolbrook Road junction with the A3052. There was one serious PIC at the entrance to Waitrose.
- 2.2.3 There are two PICs evident on Woolbrook Road. There has been one slight PIC at the junction of Stowford Rise. Further along Woolbrook Road there have been two slight PICs to the west of the roundabout with Arcot Road, and a serious PIC in Manstone Avenue.

Figure 2.1: Recorded Personal Injury Accidents 2017-2021



2.3 Pedestrian Environment Audit

Core Hill Road

- 2.3.1 North of its junction with the A3052, Core Hill Road has no pedestrian facilities, however it is very lightly trafficked and pedestrians were observed walking along the lane. To the south there is a short section of Core Hill Road that is suitable for pedestrians and cyclists only (see Plate 2.1). There are no dedicated crossing facilities on Sidford High Street for pedestrians at this point.

Plate 2.1 – Core Hill Road (section closed to motor vehicles)



- 2.3.2 The short section closed roadway comes out onto Stowford Rise. Pedestrians wishing to cross Stowford Rise can use the zebra crossing nearby, however there is evidence that pedestrians do follow the desire line directly onto the southern section of Core Hill Road which is also closed to vehicles at its northern end. Core Hill Road continues as a narrow lane as far as the junction with Barn Hays. Further south there is a 1.8m wide footway on the western side of Core Hill Road and then a 1m wide footway which is intermittent around Woolbrook Mead and as far as Woolbrook Road.

- 2.3.3 This is an attractive direct pedestrian route south that is free of traffic over part of its length. However, streetlighting is limited in places which will reduce its attractiveness during the hours of darkness.

Sidford High Street East

- 2.3.4 On Sidford High Street, to the east of the Core Hill Road junction, there is a 2m wide footway on the north side of the street which extends for 60 metres to a crossing point with dropped kerbs and tactile markings. Pedestrians can cross at this point to get to the Waitrose Supermarket and there is a 3.5m wide central refuge which eases the crossing movement. An eastbound bus stop is located on this section of footway near to the junction with Core Hill Road (see Plate 2.2).

Plate 2.2 Footway and Bus Stop adjacent to the site



- 2.3.5 On the south side of the street there is a 1.8m wide footway between the westbound bus stop and the junction with the link road to Stowford Rise. Dropped kerbs and tactile paving is provided for pedestrians crossing the link road. To the east the footway is over 2.5m wide. This footway continues to the Waitrose supermarket and follows the northern boundary of a residential development. Good quality street lighting is provided over this section of highway.
- 2.3.6 On the south side of Sidford High Street a 2 metre wide footway continues from the residential development adjacent to the carriageway. This footway continues all the way to the centre of Sidford where there is also a footway on the north side of the carriageway. There is street lighting over much of this length.
- 2.3.7 In conclusion there is a good pedestrian route eastwards from the Core Hill Road.

Sidford High Street West

- 2.3.8 West of the Core Hill Road junction there are no pedestrian facilities on either side of Sidford High Street.

Stowford Rise

- 2.3.9 Stowford Rise has footways on both sides of the street and these are at least 2 metres in width. Over much of its length, this footway is separated from the roadway by a 2 metre wide grass verge. Dropped kerbs and tactile paving are provided at side street crossing points. A good standard of street lighting is also present. This street is of a good standard for pedestrians including those that are mobility impaired at its eastern end. The southern section is steep as one drops down to Woolbrook Road.

Woolbrook Road

- 2.3.10 Between the A3052 and the priority narrowing, to the west of the Stowford Rise junction, there are no pedestrian facilities fronting Woolbrook Road and no street lighting. Beyond this point there is a 2 metre wide footway on the north and south side of the street. However, beyond the junction with Stowford Rise the northern footway disappears. The southern footway continues as far as Core Hill Road. Street lighting is present.
- 2.3.11 East of the Core Hill Road junction, Woolbrook Road has 2 metre wide footways on both side of the street and streetlighting.

Sid Valley Ring

- 2.3.12 The Sid Valley Ring is a well signed journey around the Sid Valley, set up in 2019 (See Plate 2.3). It uses existing footpaths around the town to promote walking. The full walk is 13 miles but there are shorter option options for a 9 or 7 mile walk. The walk runs along Core Hill Lane, described as the old road from Sidmouth to Ottery St Mary which runs adjacent to the site.

Plate 2.3 Sid Valley Ring



2.4 Bus Services

- 2.4.1 The closest bus stop is 230m (3 minutes' walk) away from the centre of the proposed site and is served by several bus routes which provide access to local towns including Exeter, Weymouth, Poole, Seaton and Honiton, as well as regular services to the centre of Sidmouth and Sidford. Services to Exeter are provided by the X53 and the 52A/B which collectively stop more than once per half hour Monday to Saturday. Service to the closest railway station at Honiton is provided by the 52B which stops at the proposed site every hour Monday to Saturday. Services into the centres of Sidmouth and Sidford are provided every half hour by the 52A/B Monday to Saturday and every hour on Sundays. The 899 service also stops daily. Details of the bus services to the stop nearest to the proposed site are shown in Table 2.1.

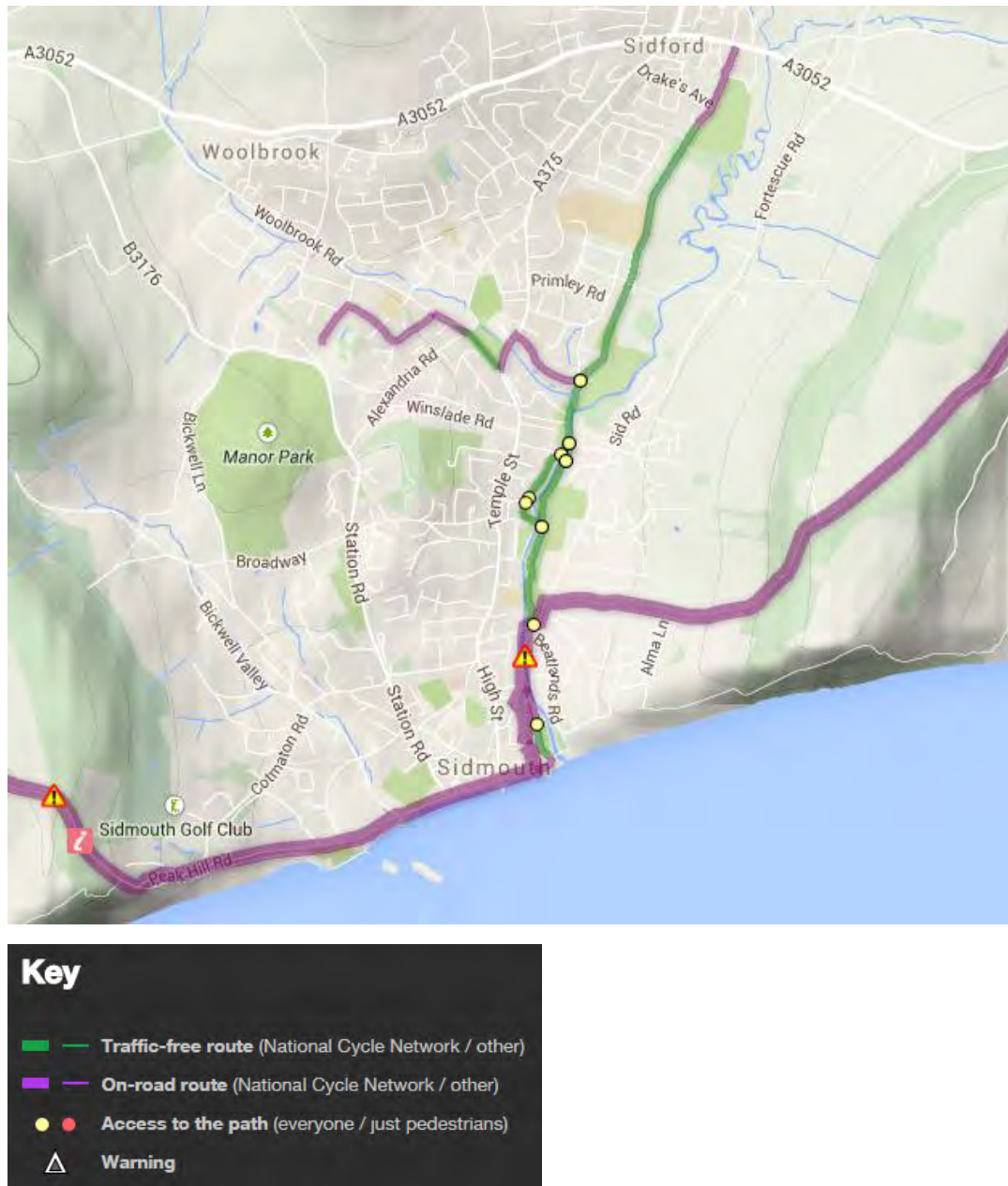
Table 2.1: Existing bus services from the proposed site

Service No.	Route Details	Mondays to Fridays	Saturdays	Sundays
52 West	Seaton-Exeter	Once daily: 10.26	-	-
52 East	Exeter-Seaton	Once daily: 14.22	-	-
9A East	Exeter-Seaton/Honiton	Every hour First bus: 6.48 Last bus: 19.35	Every hour First bus: 8.07 Last bus: 19.34	Every 2 hours First bus: 10.38 Last bus: 18.37
9A West	Seaton/Honiton – Exeter	Every hour First bus: 7.07 Last bus: 21.00	Every hour First bus: 7.37 Last bus: 20.55	Every 2 hours First bus: 9.41 Last bus: 19.33
X9 East	Exeter-Seaton or Honiton	Once daily: 07.12	-	-
9 East	Exeter – Seaton or Honiton	Every half an hour to an hour First bus: 8.00 Last bus: 00.05	Every hour First bus: 7.24 Last bus: 00.04	Every hour First bus: 9.08 Last bus: 00.04
9 West	Seaton or Honiton – Exeter	Every half an hour to an hour First bus: 6.39 Last bus: 22.55	Every hour First bus: 7.07 Last bus: 22.55	Every hour First bus: 8.51 Last bus: 22.53
382 West	Sidmouth – Whimble	Once daily: 15.37	-	-
899S East	Seaton – Sidford – Sidmouth – Budleigh Salterton – Littleham	Twice daily First bus: 7.59 Last bus: 17.09	-	-
899S West	Littleham – Budleigh Salterton – Sidmouth – Sidford – Seaton	Three times daily First bus: 7.02 Last bus: 16.08	-	-

2.5 Cycle Network

2.5.1 The National Cycle Network Route 2, which stretches from Dover to St Austell, passes through the south of Sidmouth. The route is connected to local cycle routes which pass through the centre of Sidmouth and on to Sidford. The cycle route can be accessed by a 1km (3½ minute) cycle journey down Core Hill, then Woolbrook Road, joining at the junction between Balfours and Higher Woolbrook Park. As well as being used to travel to local destinations, the cycle network provides safe routes for cyclists to nearby coastal towns including Seaton, Exmouth and Exeter. The layout of these routes is shown in **Figure 2.2**.

Figure 2.2: Layout of local cycle routes including the National Cycle Network Route 2



3 PROPOSED ACCESS

3.1 Ghost Island Access via A3052

- 3.1.1 The most appropriate solution for vehicular access to the development site is to create a new junction onto the A3052 east of the staggered crossroad with Core Hill Road and Stowford Rise. The new access will form a ghost island by extending the central right turning lane for southbound traffic further east. This will be achieved by widening the carriageway into the proposed development site.
- 3.1.2 The junction will be located at a suitable offset of 60m east of the centre of the junction with Stowford Rise. The right turn ghost island lane features a width of 3.5m while the two straight ahead lanes will feature a width of 4.0m to be in keeping with the existing arrangement.
- 3.1.3 Visibility of 2.4m x 120m can be achieved in both directions which is the required visibility for a 40mph road. To achieve adequate visibility a large section of hedgerow will be removed.
- 3.1.4 A scheme design can be seen in the Drawing 7894-001
- 3.1.5 Vehicle tracking has been undertaken for the proposed access for a Standard Refuse Vehicle and DB32 Fire Appliance. The turning movements that were tracked included left turn in, left turn out and right turn in. All turning movements achieved the manoeuvre with adequate reserve space.
- 3.1.6 The vehicle tracking is shown on Drawing 7894-002.

3.2 Core Hill Road

- 3.2.1 Access to the north of Core Hill Road must be retained due to existing access requirements to dwellings etc. The proposed access arrangement allows Core Hill Road to be retained in its current arrangement. Alternatively it would be feasible to close Core Hill Road at its junction with the A3052 and divert the route into the eastern part of the development and to the new junction. This would allow the section of closed road to be converted into a shared footway/cycleway complimenting and connecting directly into the route south of the A3052 with a crossing facility

4 SUSTAINABILITY

4.1 Walking and Cycling Distances to Local Facilities

Walking Distances

- 4.1.1 When assessing the accessibility of a site for pedestrians, an average walking speed of 1.4 m/s can be assumed, which equates to approximately 400 metres in 5 minutes, or 3 mph. (Source: The Chartered Institution of Highway and Transportation (CIHT) publication 'Guidelines for Providing Journeys on Foot, 2000). This document also contains a table of suggested walking distances for different purposes. Table 4.1 shows these suggested walking distances:

Table 4.1: Suggested Walking Distances

	Town Centres	Commuting / School	Elsewhere
Desirable	200m	500m	400m
Acceptable	400m	1000m	800m
Maximum	800m	2000m	1200m

Source: CIHT 'Guidelines for providing for journeys on foot'

- 4.1.2 The desirable maximum walking distance to the nearest bus stop is considered to be 400m (CIHT Guidelines for Planning for Public Transport in Developments).
- 4.1.3 The DfT Manual for Streets (2007) describes the walkable neighbourhood as:
 'Walkable neighbourhoods are typically characterised by having a range of facilities within 10 minutes' (up to about 800 m) walking distance of residential areas which residents may access comfortably on foot. However, this is not an upper limit and walking offers the greatest potential to replace short car trips, particularly those under 2 km. MfS encourages a reduction in the need to travel by car through the creation of mixed-use neighbourhoods with interconnected street patterns, where daily needs are within walking distance of most residents.'

Cycling Distances

- 4.1.4 The CIHT notes that three quarters of journeys by all modes are less than five miles (8km) and half are less than two miles (3.2km). These are distances that can be cycled comfortably by a reasonably fit person. Based on an average cycling speed of 4.0m/s (14.4kph), 8 kilometres can be cycled in just over half an hour and 3.2 kilometres can be cycled in less than 15 minutes. It is also generally accepted that cycling has the potential to substitute for short car trips, particularly those less than 5km.
- 4.1.5 There are a variety of local facilities within walking and cycling distance of the development site as shown in Table 4.2 which lists the key facilities and the distance from the centre of the proposed site.
- 4.1.6 All the facilities shown in Table 4.2 are within a 2km walking distance of the proposed site and all but one are within one mile (1.61km). This is Sidmouth College and this is only a fraction over one mile away. Future residents of the proposed development would be able to walk or cycle in place of car trips to reach these local facilities. Although, it should be noted that cycling can be more challenging to some of the facilities due to the local topography.

Table 4.1: Walking and Cycling Distances to Local Facilities

Facility	Distance (metres)	Walking time (minutes)	Cycling Time (minutes)
<i>Public Transport</i>			
Bus Stop (Core Hill Road)	230m	3 minutes	1 minute
Bus Stop (Waitrose)	430m	5.5 minute	1.5 minutes
<i>Education</i>			
Sidmouth Children's Centre	490m	6 minutes	1.5 minutes
Sidmouth Primary School	1120m	14 minutes	3.5 minutes
Sidmouth College	1630m	20.5 minutes	5.5 minutes
<i>Employment</i>			
Industrial Estate	1570m	18.5 minutes	6.5 minutes
<i>Health</i>			
Boots Pharmacy	1380m	17.5 minutes	4.5 minutes
Sid Valley Practice Surgery	1530m	18 minutes	6.5 minutes
<i>Leisure</i>			
The Balfour Pub	1300m	16.5 minutes	4.5 minutes
Sidmouth Town AFC	1330m	16.5 minutes	4.5 minutes
Stowford Community Centre	490m	6 minutes	1.5 minutes
St Mary's Church	1150m	14.5 minutes	4 minutes
St Francis Assisi Church	1020m	13 minutes	3.5 minutes
<i>Shopping</i>			
Waitrose	380m	5 minutes	1.5 minutes
Sidmouth Garden Centre	300m	4 minutes	1 minute
Sidmouth Centre local shops	1540m	18 minutes	6.5 minutes

Note: Assumes average walking speed of 1.4m/s and average cycling speed of 4.0m/s. Distances are calculated from the centre of the site.

- 4.1.7 There is a large Waitrose 380m from the proposed site meaning it is not necessary for residents to travel by car in order to buy groceries. Safe, direct and convenient routes to supermarkets are suggested by The Department for Transport's Local Transport Note 1/04 *Policy, Planning and Design for Walking and Cycling* to be an important factor in encouraging walking and cycling over car use.
- 4.1.8 The CIHT's *Providing for Journeys on Foot* suggests acceptable walking distances for certain facilities. For schools the desirable distance is 500m with 1km considered acceptable and 2km considered the preferred maximum. The Sidmouth Children's Centre is within 500m whilst Sidmouth Primary School is within the 2km maximum.
- 4.1.9 The nearest bus stop, at a distance of 230m from the proposed site, lies well within the guidance from the Chartered Institution of Highways and Transportation's (CIHT's) *Planning for Public Transport in Developments* which recommends that walking distances to bus stops should not exceed 400m. Some residents would be encouraged, by the short distance to the nearest bus stop, as well as the level of services offered, to use public transport instead of car journeys to reach facilities which are beyond walking or cycling distance.
- 4.1.10 The Walking Isochrone, Drawing 7894-ISO01, demonstrates that the Core Hill bus stop is located within 400m of the proposed development, as is the Waitrose shop. Within 800m of the proposed development residents will be able to walk to Sidmouth Children's Centre and Stowford Community Centre. Within 1200m of the proposed development Sidmouth Primary school can be accessed as well as two churches. As referenced in table 4.1 the maximum distance a person can be expected to walk is 2km, there are multiple destinations available to residents including an industrial estate. Other locations available within this isochrones can be seen in Table 4.2 above.
- 4.1.11 The Cycling Isochrone, Drawing 7894-ISO02, demonstrates that the Sidmouth esplanade at the seafront can be accessed by a 3.2km cycle, as is the village of Sidbury. Newton Poppelford is accessible 5km to the west by cycle. Other locations available within these isochrones can be seen in Table 4.2 above.
- 4.1.12 The Public Transport Isochrone, Drawing 7894-ISO03, demonstrates that all of Sidmouth as well as the A3052 to Exeter is accessible within a 30 minute bus journey. Passengers will be able to access Seaton and Exmouth within a 60 minute journey as well as most of Exeter including Exeter St David's station and Exeter Central station.
- 4.1.13 Walking, Cycling and Public Transport Isochrones from the proposed development site can be seen in the attached Drawings section of this report.

4.2 Modal Split

- 4.2.1 The 2011 census 'Method of Travel to Work' for Sidmouth has been analysed and is summarised within Table 4.3. 692 persons were not in employment, 813 persons were in employment. The census shows the importance of car travel but also of walking amongst the existing population.

Table 4.3: 2011 Census 'Method of Travel to Work – Resident Population

Mode of Travel	Persons - Sidmouth	
	Count	Percentage
All people in employment	813	100.00%
Works mainly at or from home	147	18.1%
Underground, metro, light rail or tram	1	0.1%
Train	10	1.2%
Bus, minibus or coach	25	3.1%
Taxi or minicab	3	0.4%
Motorbike, scooter or moped	10	1.2%
Driving a car or van	490	60.3%
Passenger in a car or van	27	3.3%
Bicycle	15	1.8%
On foot	81	10.0%
Other	4	0.5%

4.3 Sustainable Travel Initiatives

4.3.1 It is recommended that proposed sustainable travel initiatives at the development should include the following to build on the accessible location:

- Travel Information Packs for all households;
- Complimentary bus passes for residents
- Electric Vehicle Charging points for households;
- Promotion of car sharing; and
- Promotion of cycling particularly electric bicycles.

5 SUMMARY AND CONCLUSIONS

5.1 Proposed Site

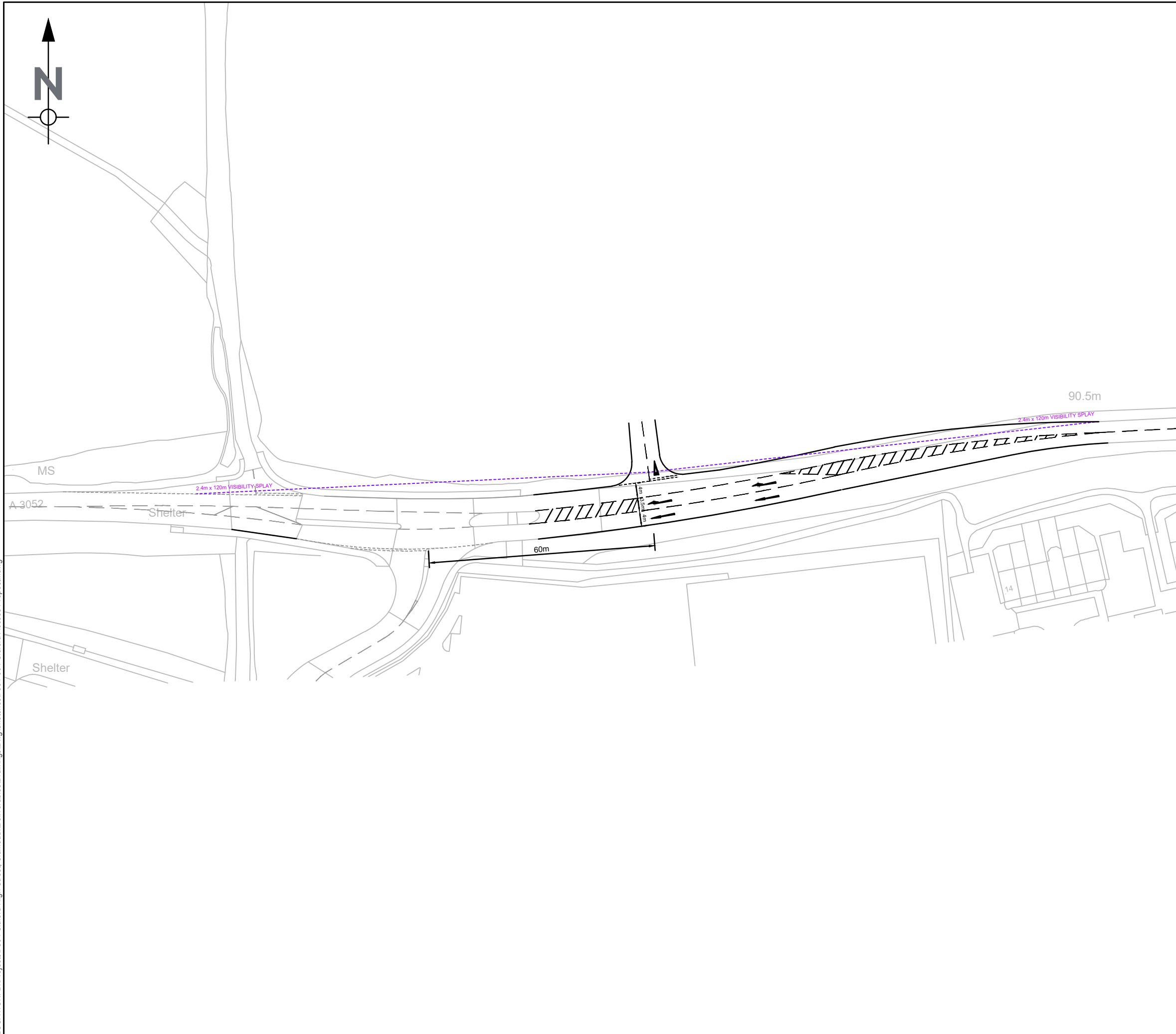
- 5.1.1 The proposed development site is located to the north of the A3052 Sidford High Street on the northern edge of Sidmouth. The site is well located in relation to public transport and other local facilities.
- 5.1.2 The proposed access takes the form of a ghost island access to the east of the existing staggered crossroads. Suitable visibility can be achieved, and the design has been tracked to demonstrate a refuse vehicle and a fire appliance can access the proposed development
- 5.1.3 Recorded Personal Injury Collisions (PICs) on the local highway network for the five year period 2017 to 2021 have been examined. The analysis shows that the highway network has a good safety record and there is not a specific collision problem.
- 5.1.4 A good standard of walking routes exists from the proposed site south along Core Hill Road and east along Sidford High Street. Walking and cycling distances and journey times have been determined for the proposed site. A good range of education, employment, health, leisure and shopping distances are within acceptable walking and cycling distances of the site.
- 5.1.5 Regular bus services can be accessed from existing bus stops on the A3052 well within a 400m walking distance of the site. Services provide up to a half hour frequency link to Sidmouth town centre and Exeter.
- 5.1.6 A series of sustainable travel initiatives are recommended to maximise sustainability.

5.2 Overall Conclusion

- 5.2.1 The proposed site off Sidford High Street, Sidmouth is suitably located for residential development in transport and highways terms.

DRAWINGS

LOG IN NAME: CHRIS BROOKE
 LOCATION: B:\Projects\7894 - Sidford High Street - Sidmouth Deliverables\Drawings\DWG\Sketches\7894-001 Sidford Access Proposal.dwg



NOTES:

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REV	DATE	DRAWN	REV'D	APP'D	NOTES

DRAWING STATUS

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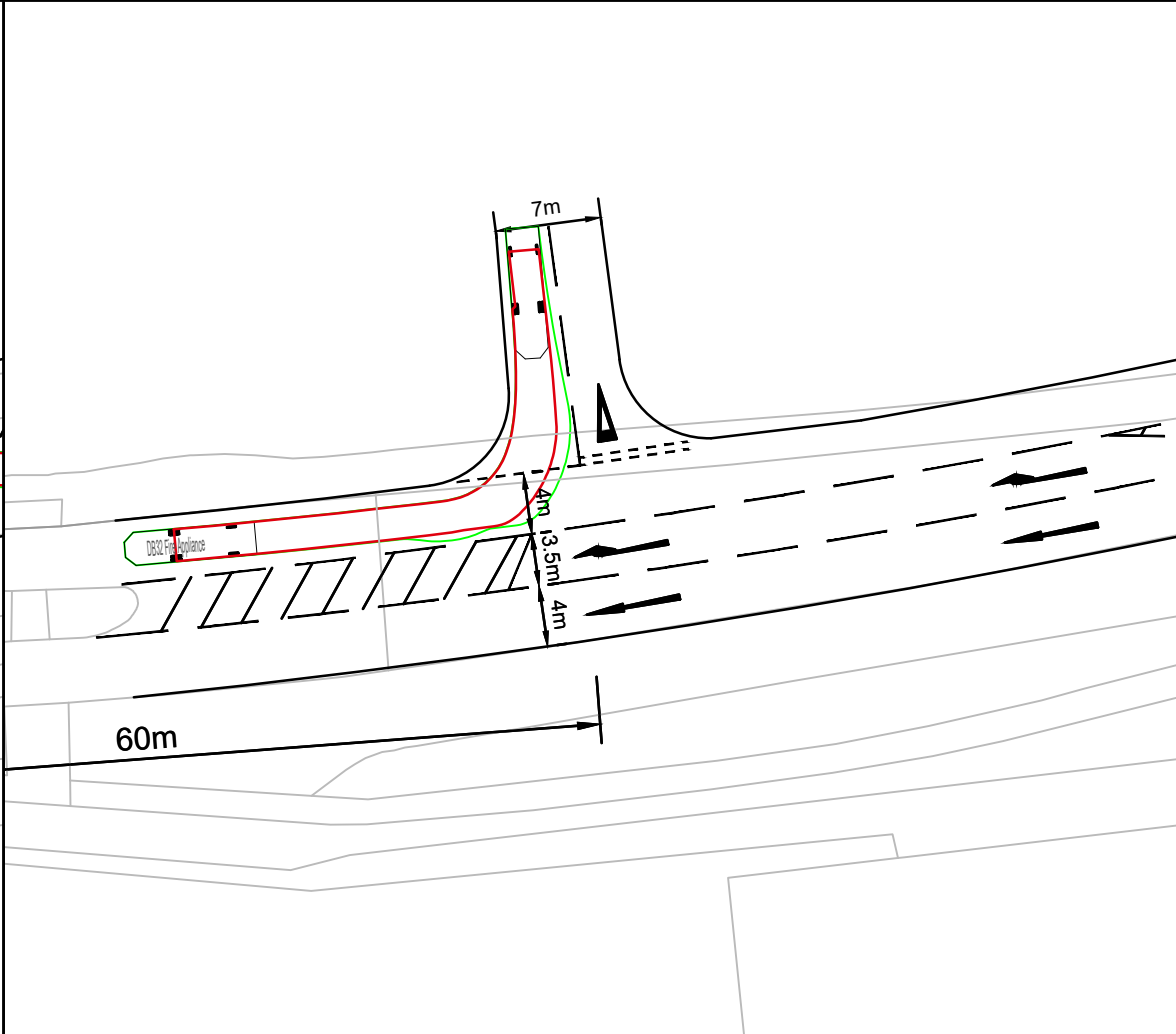
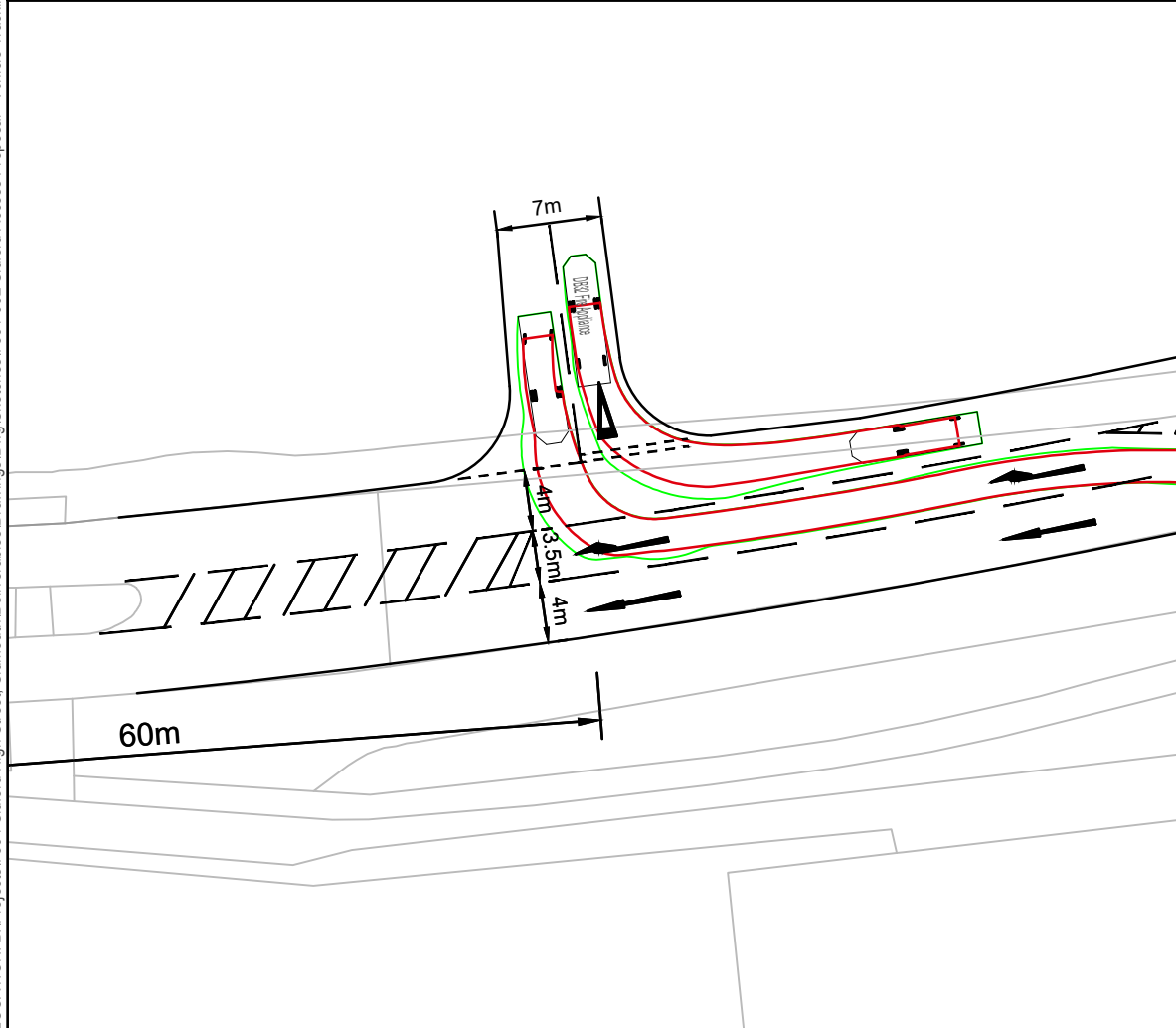
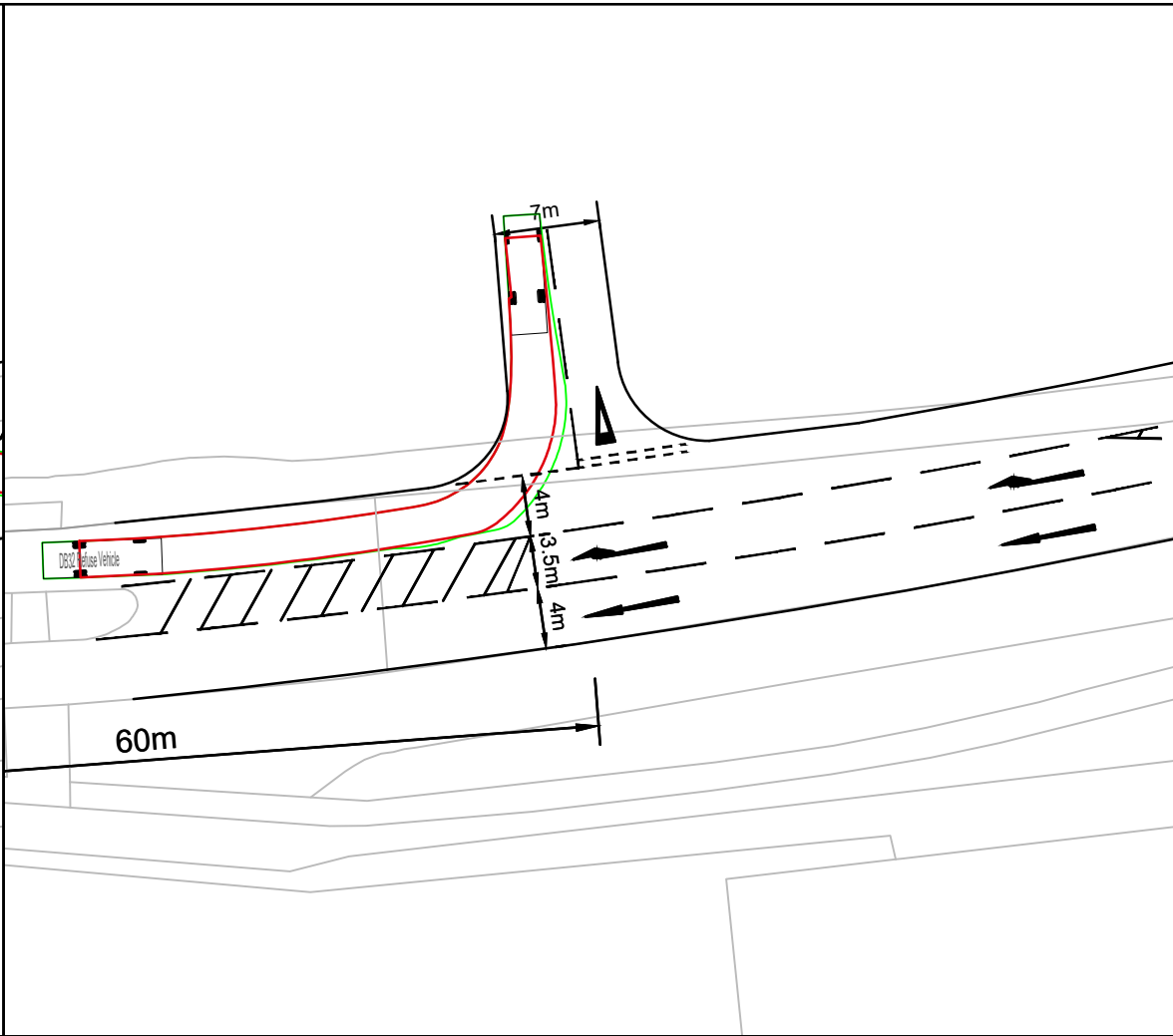
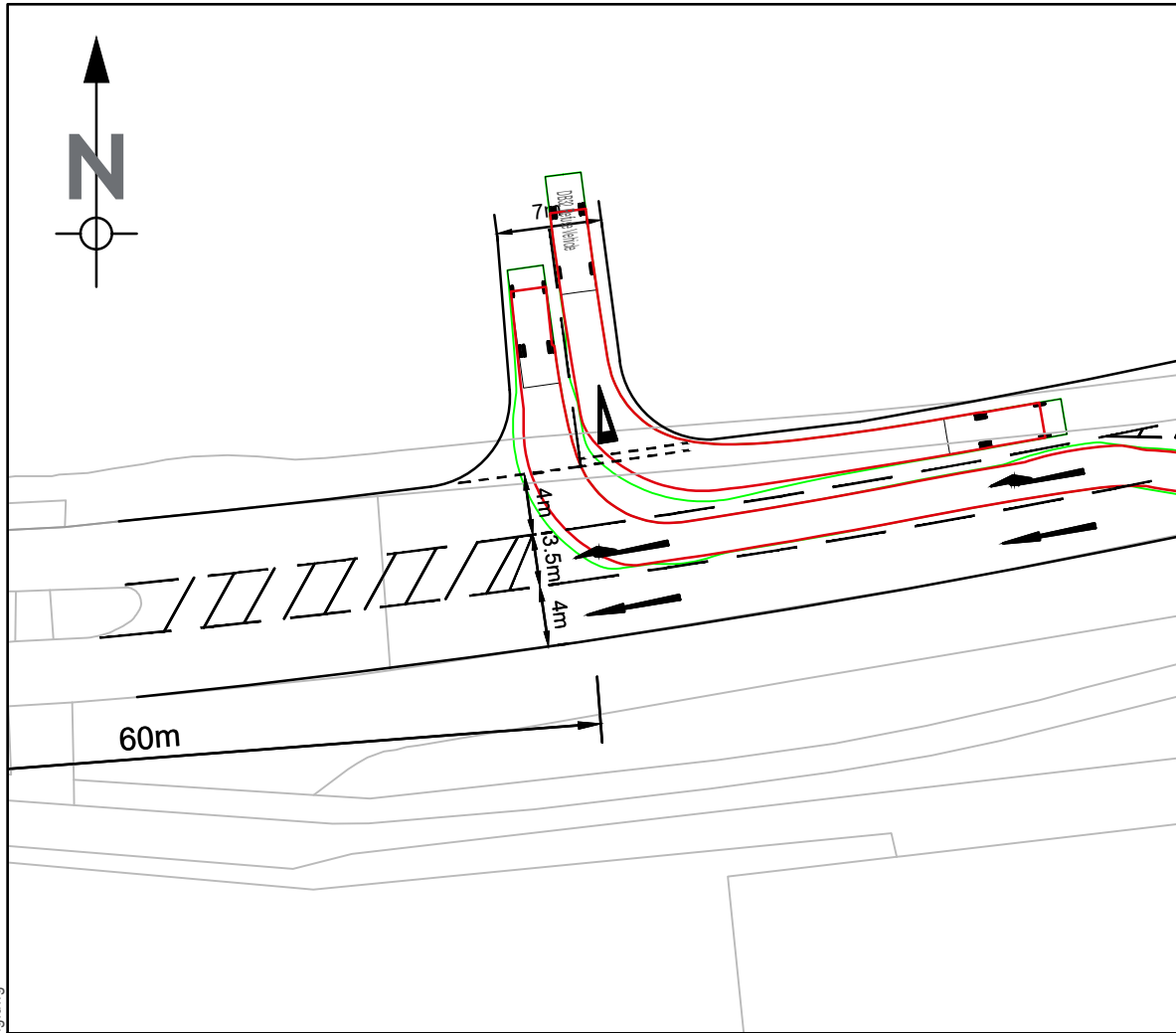
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 Bloor Homes

PROJECT
 SIDFORD HIGH STREET, SIDMOUTH

DRAWN	DESIGNED	REVIEWED	DATE	APPROVED	DATE
CWB	CWB	DAK	11.07.22	CWB	11.07.22

TITLE
 SITE ACCESS - GHOST ISLAND T-JUNCTION

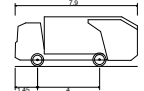
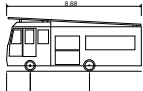
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DB32 Refuse Vehicle Overall Length 7.900m Overall Width 2.400m Overall Body Height 3.183m Min Body Ground Clearance 0.388m Max Track Width 2.400m Lock to lock time 6.00s Kerb to Kerb Turning Radius 9.625m	DB32 Fire Appliance Overall Length 8.680m Overall Width 2.180m Overall Body Height 3.452m Min Body Ground Clearance 0.337m Max Track Width 2.121m Lock to lock time 6.00s Kerb to Kerb Turning Radius 7.910m

REV	DATE	DRAWN	REV'D	APP'D	NOTES

DRAWING STATUS

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PROJECT
SIDFORD HIGHSTREET, SIDMOUTH

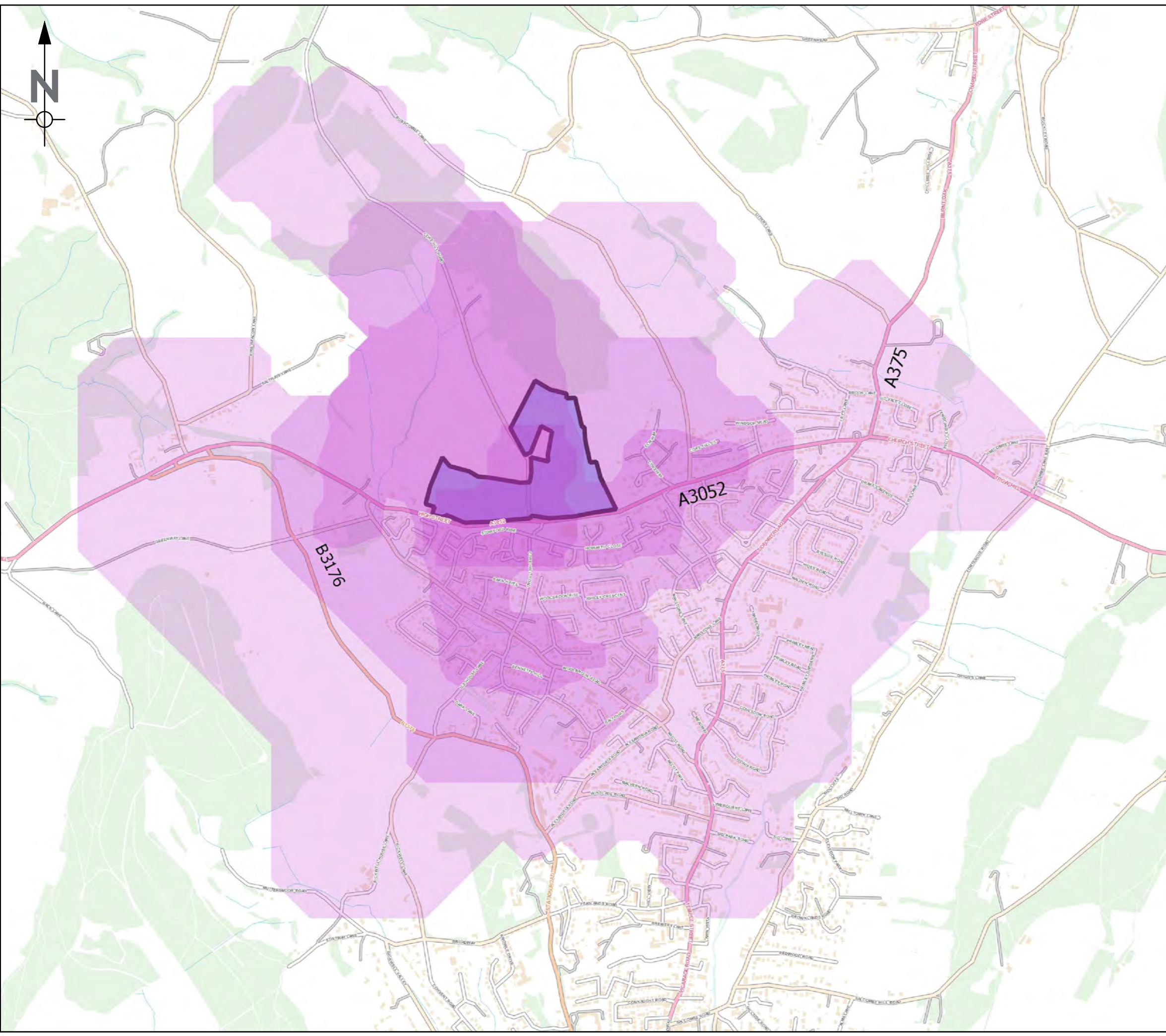
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CWB	CWB	DAK	11.07.22	CWB	11.07.22

TITLE
SITE ACCESS - GHOST ISLAND T-JUNCTION
VEHICLE TRACKING

SCALE	DRAWING No	REV
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LOGIN NAME: CHRIS BROOKE
 LOCATION: B:\Projects\7894_Sidford_High_Street_Sidmouth\Deliverables\Drawings\Dwg\Sketches\7894-002_Sidford_Access_Proposal - Vehicle Tracking.dwg

LOGIN NAME: CHRIS BROOKE
 LOCATION: B:\Projects\7894_Sidford High Street_Sidmouth Technical\GIS\CAD\Sidmouth Frames.dwg



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KEY

- PROPOSED DEVELOPMENT SITE
- 400m ISOCHROME
- 800m ISOCHROME
- 1200m ISOCHROME
- 2000m ISOCHROME

REV	DATE	DRAWN	REV'D	APP'D	NOTES

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PROJECT

SIDFORD HIGH STREET, SIDMOUTH

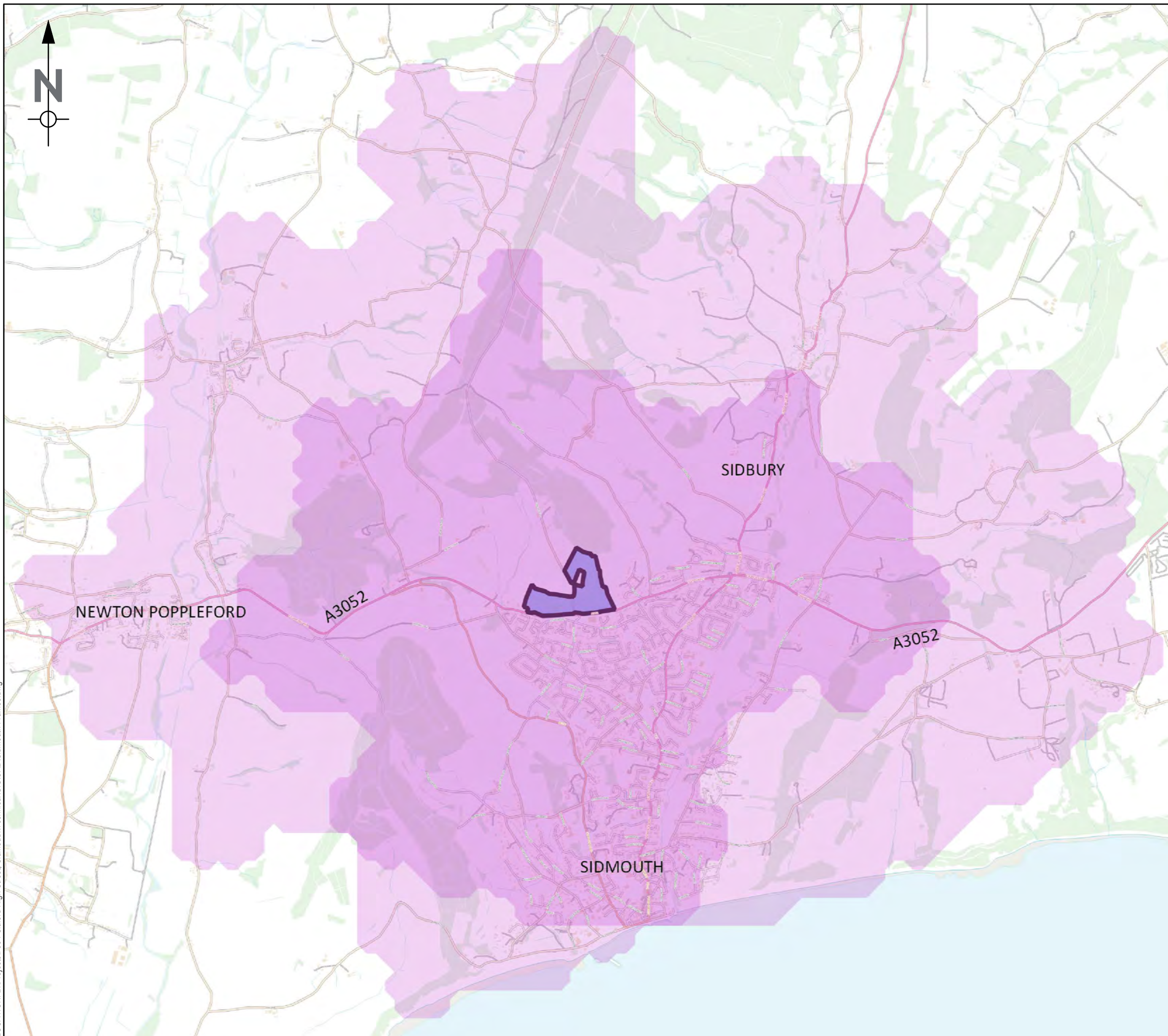
DRAWN	DESIGNED	REVIEWED	DATE	APPROVED	DATE
MC	MC	CWB	05.07.22	DAK	05.07.22

TITLE

WALKING ISOCHROME

SCALE	DRAWING No	REV
NTS	7894-IS01	10

LOGIN NAME: CHRIS BROOKE
 LOCATION: B:\Projects\7894 Sidford High Street_Sidmouth\Technical\GIS\CAD\Sidmouth Frames.dwg



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KEY

- PROPOSED DEVELOPMENT SITE
- 3.2km ISOCHRONE
- 5km ISOCHRONE

REV	DATE	DRAWN	REV'D	APP'D	NOTES

DRAWING STATUS

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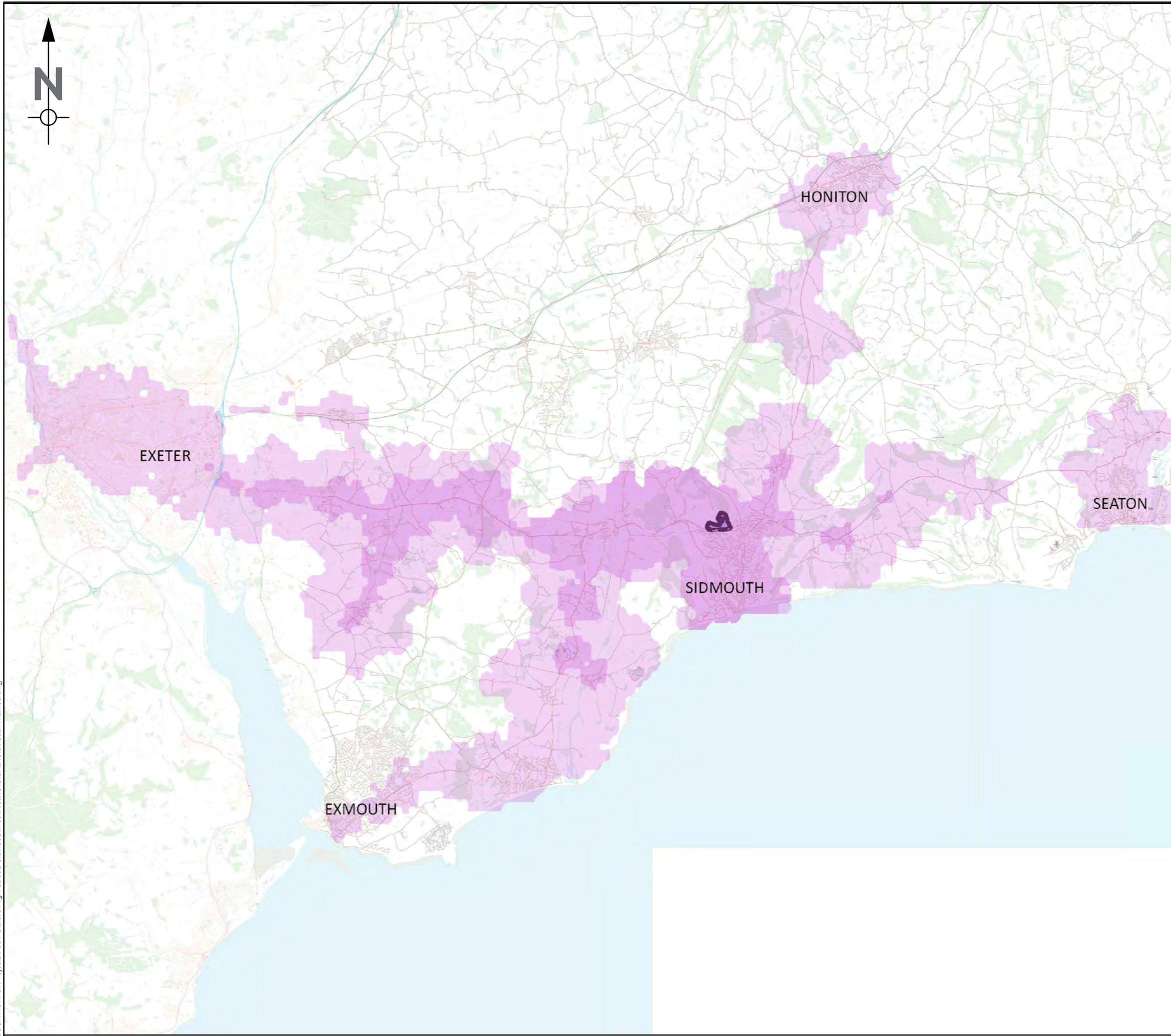
PROJECT
 SIDFORD HIGH STREET, SIDMOUTH

DRAWN MC	DESIGNED MC	REVIEWED CWB	DATE 05.07.22	APPROVED DAK	DATE 05.07.22
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TITLE
 CYCLING ISOCHRONE

SCALE NTS	DRAWING No 7894-ISO2	REV 10
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LOGIN NAME: CHRIS BROOKE
 LOCATION: B:\Projects\7894 Sidford High Street_Sidmouth\Technical\GIS\CAD\Sidmouth Frames.dwg



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KEY
 ■ PROPOSED DEVELOPMENT SITE
 ■ 30 MINUTE ISOCHROME
 ■ 60 MINUTE ISOCHROME

REV	DATE	DRAWN	REV'D	APP'D	NOTES

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PROJECT
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DRAWN	DESIGNED	REVIEWED	DATE	APPROVED	DATE
MC	MC	CWB	05.07.22	DAK	05.07.22

TITLE
 PUBLIC TRANSPORT ISOCHROME

SCALE	DRAWING No	REV
NTS	7894-ISO3	10

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