

Response to emerging Local Plan 2020 – 2040

Strategic Policy 23 - Seaton

I object to the proposals within the emerging Plan to include land outside the built up area boundary for future development, ie on the Green Wedge, and urge EDDC to remove those sites. Such a proposal is unsustainable for all the reasons below as well as no longer being a government requirement. Seaton has more than fulfilled its new housing numbers as allocated in both previous Local Plans and therefore any additional needs should be located within the town's built up area boundary as EDDC committed to do in the current Local Plan, recognising the importance of retaining and preserving the town's unique natural environment.

1) Landscape

- Seaton sits within a stunning natural environment with international and national recognition of its geological, wildlife habitat and landscape quality value. In the current adopted Plan 2013 – 2031 EDDC states: “The Axe Wetlands, Dorset and East Devon Coast World Heritage Site (Jurassic Coast) and surrounding exceptional coastline will be key environmental assets that will be integral to the future success of the town”.
- EDDC made a commitment to Seaton in the current Plan 2013-2031 that “the focus for the town would be on ensuring the conservation and enhancement of its world-class natural environment and that any further significant housing developments beyond the existing Built-up Area boundary would be restricted by locating the majority of the required 150 houses within the existing town.”
- The proposals contained within the emerging Plan to build on the town's Green Wedge would change Seaton's landscape forever; any development within the Green Wedge will severely harm biodiversity and the quality and character of the countryside and will pose a significant adverse risk to the high quality, nationally and locally recognised environmental features of the area, thereby negatively impacting on the town's future success. As such it is unsustainable.
- To allocate land within the Green Wedge between Seaton and Colyford would be contrary to strategy 8 – Development in Green Wedges of the current East Devon Local Plan 2013-2031, and policy 78 of the Emerging Local Plan
- Plans to develop this land have been refused twice by EDDC and upheld by the Planning Inspector who stated: “The gap at present is obvious, especially in views from the west when approaching along Harepath Hill (A3052). The proposed development would effectively close the gap, taking virtually all of the presently undeveloped land and negating the sense of Colyford as a separate settlement. I acknowledge that there would be retained hedges and some additional planting – both on the site and in adjacent areas - to screen at least some of the new development but, even when fully grown, this would not entirely screen the appearance new development, particularly in the elevated views from Harepath Hill. Neither would the screen planting overcome the change in character of this area from open rural to an (albeit partially screened) virtually continuous urbanised area, with the perception of coalescence of Colyford and Seaton at this point”. He concluded that “the housing shortfall although significant is - arguably - relatively short term, whereas the erosion of separation between Colyford and Seaton would be permanent, and should not be acceded to lightly.”

2) Housing Numbers

The case for housing within East Devon made in East Devon's Local Housing Needs Assessment appears to be largely based on “modelling” “assumptions” and “predictions” with no hard evidence of the actual housing need in Seaton.

- In the 2012 – 2026 Local Plan Seaton was required to deliver 638 new dwellings.
- By September 2016 there had been 717 applications approved with those at Seaton Quay and Tesco (222 plus a further 20 - 16/0435) currently under development, ie **by 2022 Seaton had already delivered 99 dwellings above its allocation to 2026**
- Since 2016 a further 60 dwellings have been developed making a total of 159 excess dwellings above its current Local Plan allocation. There have also been applications for another 30 dwellings which, whilst currently refused or withdrawn, are likely to be amended and re-submitted. If approved, this would mean that by 2022 Seaton has already contributed 189 out of its allocation to 2040 of 217, so its allocation within the emerging Plan should be amended to 28.
- It is reasonable to assume that further applications will come forward between 2022 – 2040, for example development of Riverside Workshops when the work units are relocated to Colyford Road as planned, to name just one, therefore the outstanding allocation of 28 dwellings could be accommodated within the town's built up boundary.

Alternative Sites

- We know that the Riverside Workshop site is earmarked for redevelopment for housing, the workshops to be relocated to the old recycling site at Colyford Road which was demolished **in 2011** for this purpose, but no mention is made of this within the emerging Plan even though that development would meet EDDC's stated commitment to restrict development to “within the existing town”.
- A further site could be available at Marshlands, Harbour Road, where Seaton Town Council has considered redeveloping their site to include residential provision.
- If land adjacent to Harbour Road at Bradford and Harcombe Engineering were to become vacant, they would provide additional future sites within the existing town.

3) Infrastructure

Strategy 25 of the current Local Plan states that “community facilities, school, health, social and cultural, were seen as borderline or inadequate with no capacity to serve additional residents”.

10 years later, there are the same number of doctors surgeries as there were then, there has been a further decline in infrastructure with the loss of our fully functioning hospital, a primary school close to capacity, community facilities at Colyford Road demolished, and reduced bus services.

Homes at Seaton Quay and Tesco/Bovis are still to be completed in addition to the numerous infill developments that have taken place since adoption of the current Plan,

The town's infrastructure cannot support the additional 217 dwellings proposed in the emerging Plan plus the developments at Seaton Quay and Bovis/Teso awaiting completion. There is no increase in any infrastructure proposed to cope with such a surge in population. The proposal is therefore unsustainable.

4) Flooding and Phosphates

Flooding in Seaton is on the increase. Our soil type impedes drainage and we have a dysfunctional drainage system with mixed ownership or in some cases unknown ownership, resulting in inadequate or zero maintenance. Any development on green field sites will therefore result in further flooding of residential properties.

Natural England has told EDDC that it should no longer grant planning permission to any development that could increase phosphate levels in the River Axe, which are said to be causing a "significant issue". To propose development within the Green Wedge is therefore unsustainable.

5) Wildlife

Seaton's "brand" is its outstanding and unique natural environment on which it has built its tourism offer. To build on the Green Wedge will have a detrimental effect on the town's precious wildlife, particularly a number of endangered species of bats, contrary to Policy 78. Therefore EDDC's statement that these assets are integral to the future success of the town cannot be met and the proposal is therefore unsustainable.

6) Biodiversity Net Gain

Any proposal to develop land within the Green Wedge will reduce biodiversity rather than increase it, contrary to the Environment Act 2021 requiring 10% biodiversity net gain on all planning permissions granted. To provide additional biodiversity outside Seaton which we understand could be proposed as an alternative, will not benefit the town and will dilute its unique natural environment, contrary to policy 78.

7) Loss of agricultural land

Any development of land east and west of Harepath Road would result in the loss of a significant amount of the best and most versatile agricultural land around Seaton. Poorer quality land has been identified for development at Seaton which should be developed first before considering development on this higher quality agricultural land.

The proposal to allocate this land for development is contrary to advice contained within the National Planning Policy Framework.

8) Recreational facilities

Seaton has for years had well below the national minimum standard of 1.2 hectares of outdoor playing pitches per 1,000 population as laid down by the National Playing Fields Association.

In 2015 EDDC's Playing Pitch Strategy stated that "Seaton Town FC's Colyford Road pitch is over capacity, too narrow and the club needs additional pitches"..... steps should be taken to ".....explore and encourage provision of a new home ground with a minimum of 2 full-sized pitches and one youth 9v9 pitch..... with adequate ancillary facilities (car parking and changing)...."

Since then Seaton Football Club still has only two pitches of .8 hectares each, one at Colyford Road and one at Elizabeth Road but with an increased current playing membership of 278. To propose an additional 217 dwellings in addition to completion of the Bovis and Seaton Quay developments could result in excess of 1,000 new residents. It is reasonable to assume that many of them will wish to join the Football Club and have need of outdoor playing space, thus swelling membership even further but with the emerging Plan offering no additional facilities.

The emerging Plan makes no reference as to how the town's woeful underprovision of outdoor playing space will be redressed, therefore to propose yet further housing with the increased demands for outdoor playing pitch facilities they would need, is unsustainable.

9) Transport

The current Plan 2013 – 2031 states: “.....improvements to public transport for commuters will be sought to help to provide, retain and make more sustainable job opportunities for the town...”

The emerging Plan states: “...Seaton has a **regular bus service** around the settlement and to areas elsewhere...”. **However, it is virtually impossible for people working normal office hours to travel from Seaton to other areas via public transport.**

There are currently two early morning 9A bus services from Seaton to Exeter (Monday to Friday) which leave the seafront at 06:25am and 07:35am respectively, the next one leaving at 10.00am. The earliest bus leaving Seaton on a Saturday is at 08:00am. This has had an impact on a number of people working in Sidmouth in care homes and the hospitality industry.

There is a Monday - Saturday bus service from Seaton to Taunton but the first bus leaves at 09:00, arriving in Taunton at 11:05am. The next bus then leaves at 12:00PM, arriving in Taunton at 14:05. BUT the last bus from Taunton to Seaton leaves at 14:15, meaning it is not a viable proposition for anyone wanting to use it to commute to work in Taunton.

There are 2 buses a day to Lyme Regis but no returns.

There are no late night bus services to and from Seaton with the last bus from Axminster to Seaton arriving in Seaton at about 7:15PM, so it is useless for those wanting to use it in conjunction with the train at Axminster. The last bus from Exeter to Seaton (Monday to Saturday), leaves the bus station at 19:05, arriving in Seaton at 20:15. Again, this is no use to those working or studying late in larger employment areas such as Exeter where there are more diverse (and better paid) jobs.

In conclusion, considering its current size and limited healthcare and amenities, Seaton has very poor public transport links to major towns such as Honiton, Taunton and Exeter, and buses to and from Axminster railway station do not link with trains to Exeter or Waterloo.

Any proposal to increase Seaton's population without clear deliverable proposals for better public transport for the working population is unacceptable and unsustainable, and makes it impossible for EDDC to deliver its commitment to improve public transport for commuters.

Because the government has stated that they are removing statutory housing quotas, and because of all the above stated reasons, I urge EDDC to remove every proposed development site that is outside the town's built up area boundaries. There is no clear justification for Seaton to provide any additional housing beyond that already in the pipeline. Any future housing must be located within the existing town to ensure that Seaton can secure its long-term prosperity by retaining its unique world-class natural environment. Any future proposals for development, however, must include increases in all infrastructure sufficient to meet future population needs before any new application is approved.

Mrs H Sanham, [REDACTED]
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