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To whom it may concern,

Draft East Devon Local Plan 2020-2040: Preferred Options Consultation Draft Plan (Reg.18)

These representations have been prepared by Savills on behalf of Land Value Alliances (LVA) in response to the consultation draft of the East Devon Local Plan 2020-2040 (Reg.18).

LVA maintain an interest in a site known as "Land West of Two Bridges Road" ('the site'). The site has attracted two references within the Draft Plan: 'SIDM_06A' and 'SIDM_06B'.

The site has been promoted previously through the consultation process of the draft plan. It has also been submitted in the past to the Council's 'call for sites' in March 2022. Subsequent to that submission and subsequent assessment, SIDM_06A has been identified within the current Reg.18 Draft Plan as a 'preferred' housing allocation while SIDM_06B is currently referred to on the supporting draft policies map as a 'rejected' site.

Our comments on the consultation and supporting evidence base are set out below and are made in accordance with paragraph 35 of the NPPF, to assist in ensuring that the Local Plan is found sound when examined in the future. We note that there is an ongoing consultation in regard to the changes to the NPPF, and that it is likely, given the published timelines for the Local Plan that these will be made prior to the Local Plan reaching a sufficiently advanced stage, and thus it will be this revised Framework upon which it will be examined.

The Spatial Strategy

Strategic Policy 1 – Spatial Strategy

We support the spatial strategy's approach to promoting "significant development" at Sidmouth, which is designated as a "main centre".

In order to ensure a deliverable and sound Local Plan, a range of housing sites should be allocated. As shown on the policies map accompanying the draft plan, Sidmouth is constrained to its west, south and east, by physical constraints (such as the sea) and landscape constraints (such as the Coastal Preservation Area, County Wildlife Sites, SSSIs and Coastal Change Management Areas). As a result, land to the north of Sidmouth, at Sidford, is the logical and sensible direction for future growth.

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Overall, the Council must prepare a robust evidence base to support the proposed housing requirement, and this can then inform the spatial strategy and offer further support for development at 'main centres'.

Strategic Policy 2 – Housing Distribution

As well as the need to ensure the Local Plan Review is supported by a robust evidence base to support the spatial strategy, we consider that further work is required on the proposed housing distribution.

Key to this will be the need to demonstrate that the proposed housing requirement of 18,920 has been carefully considered and planned for. When reviewing the proposed housing distribution it is clear that land for only 18,167 homes has been identified within the table on page 16. This amounts to a shortfall of approximately 753 homes.

This shortfall should be planned for and should certainly be accounted for within the proposed housing distribution and additional land should therefore be allocated to address the shortfall.

In our view, there is potential to accommodate a minimum of 30 dwellings not only at SID_06A but also by using land available at SIDM_06B.

Strategic Policy 3 - Levels of future housing development

In addition to the points outlined above in relation to the spatial strategy and housing distribution, we do support reference within the draft strategic policy on housing levels to the need for the plan to be sufficiently flexible and provide 'headroom' for housing supply. We therefore also support the proposal that supply in East Devon should be 10% above the proposed housing requirement, equating to about 20,800 dwellings overall.

Strategic Policy 4- Employment Provision and Distribution Strategy & Strategic Policy 5 - Mixed use developments incorporating housing, employment and community facilities

We have fundamental concerns over the two aspects of the locational strategy for economic development (development at the Tier 1 & 2 towns and the Tier 3 & 4 settlements) which seeks the provision of employment floorspace as part of mixed use schemes.

The rationale presented for economic development at the Tier 1 & 2 towns is that this would "provide jobs and workspace for new and existing residents, to improve settlement self-containment, and to reduce the need to commute to work". No evidence is provided that the wider distribution of jobs (if deliverable) would in fact achieve that objective. Increasing the number of jobs at a settlement does not mean that more residents of the settlement will work in that employment.

There is a risk that such a strategy will in fact be counter-productive, spreading a number of jobs to settlements which then attract employees to travel at great distance often by private car. Increasing the number of jobs at the Tier 1 & 2 towns will not necessarily have a marked increase on self-containment and could have the opposite effect resulting in increased in-commuting to the town.

For these reasons we are also concerned that the promotion of small-scale jobs and workspaces at the Tier 3 & 4 settlements could also have a counter-productive impact on self-containment.

The delivery of new employment must be based on demand, and should therefore be located in the right locations to address such identified demand. By seeking to provide a proportion of employment floorspace on all qualifying developments this is highly likely to result in employment development in the wrong locations in areas where the demand for such floorspace will simply not exist.

With reference to Sidmouth, it is clear that land is already allocated for employment floorspace at Sidford (041A and 041B) for the provision of up to 5 hectares of employment land, with a particular onus on B1 space. Despite these two sites being allocated in the adopted Local Plan in 2016, over 6 years ago, these employment sites have not come forward. This therefore further demonstrates the need for robust evidence to support the Council's blanket approach to draft policies 4 and 5, but also suggests that with land already allocated nearby there is currently no evidence to suggest further employment land is required in this area.

Strategic Policy 24 – Sidmouth and its future development

It is clear that, as a main centre for growth, Sidmouth should continue to be a focus for development as part of the Draft Plan.

As part of this, we support the identification of the Land West of Two Bridges Road (SIDM_06A) as a preferred site for approximately 30 homes.

We do however consider that there is potential for a higher number of homes to be accommodated at Sidford and therefore that the Draft Plan should explore the potential for SIDM_06A to accommodate a quantum of development higher than 30 dwellings 'and that SIDM_06B could logically accommodate some of this increase.

The supporting Sustainability Appraisal states the following in relation to site SIDM_06 (as a whole):

Sidm_06 - Land west of Two Bridges Road, Sidford - Development of the site (268 max yield) would have a high landscape impact (Site within AONB with high intervisibility), major heritage impact, significant moderate adverse effect on ecology. Good access to facilities and employment. PART REJECTED (6b) / Reduced site area adjacent to allocated employment site and local development fringe is PREFERRED (6a)

In response to this, it is acknowledged that the site as a whole is within the AONB and areas of heritage and ecological interest. As above, the allocation of SIDM_06A is supported. However, the Sustainability Appraisal effectively pre-judges matters of landscape, heritage and ecology for site SIDM_06B. These matters (and any necessary mitigation) should be considered in further detail.

The land west of Two Bridges Road, particularly SIDM-06A, relates well to the existing urban edge, lying adjacent to existing residential dwellings on Lower Brook Meadow and Brook Close.

The land is generally flat, with trees located along the site boundaries along with hedgerow. Vehicular access can be achieved into the site via Two Bridges Road, although more direct pedestrian and cycle connections could be achieved via Lower Brook Meadow to the south.

Whilst the site falls within an Area of Outstanding Natural Beauty as well as the Blackdowns National Character Area, it falls within flood zone 1 so is not at risk of flooding.

It is considered that the site is suitable for development, and could be delivered in a sensitive manner given the AONB designation. If additional land is identified within SIDM_06B then this would potentially also enable further supporting infrastructure alongside the residential dwellings, including the potential for public open space, highway improvements / new sections of footpath, children's play / recreation space, and community facilities.

Conclusion

We welcome the Council's decision to progress with the Local Plan despite the national uncertainty in terms of plan-making, and recognise that it is currently at an early stage.

We have concerns over the approach in draft policies 4 and 5 and the requirement for mixed use sites to be brought forward based on a standardised threshold. This is inappropriate for locations such as Sidford.

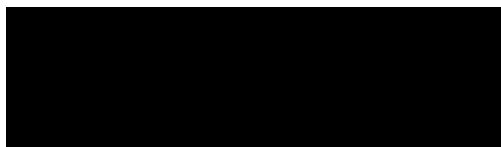
Overall, the Land West of Two Bridges Road (SIDM_06A) is ideally placed to assist in delivering sustainable development in this location. Indeed, the site represents a logical solution to addressing the identified housing needs of both the town (including the delivery of affordable housing) and wider East Devon.

Part of the site (SIDM_06A) is already identified as a draft allocation the Draft Plan which is supported, although we consider that the site could accommodate development higher than the 30 dwellings identified. The SIDM_06B could also accommodate development and could be explored further.

included in order to secure a higher as a preferred allocation in the next version of the Plan.

We trust our comments should be fully taken on board and changes to the Draft Plan made as a result.

Yours sincerely,



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Associate Director