

Local Plan - Issues and Options

– final submission from the Vision Group for Sidmouth

– 15 March 2021

East Devon Local Plan 2021 to 2040 Issues and Options consultation - January to March 2021

This pdf is a copy of the online form completed at: https://eddc-self.achieveservice.com/service/East_Devon_Local_Plan_2021_to_2040?save_id=AF-Saved-e3156fdf-8407-4b46-9b20-2fc85147c69d

This includes references in the form of 'tiny url' addresses, which open up to the original links.

In addition, this pdf provides links to specific documents which might be of use.

This is accompanied by a second pdf “Local Plan - Issues and Options – final submission from the Vision Group for Sidmouth – March 2021 – References to Sid Valley Neighbourhood Plan policies”

Chapter 1: Your Details

Organisation name:

Vision Group for Sidmouth

*In what capacity are you responding to this consultation - what most closely describes you or if you are an agent what best describes, in respect of this consultation, what your client does?**

Community or Resident group

Chapter 2: Objectives

Question 1

In paragraph 2.1 of the Issues and Options report we set out a series of suggested objectives for the future local plan that cover issues like climate change, meeting housing needs and supporting the economy. Question 1 seeks your views on these objectives.

Do you think these are the right objectives for the new local plan, are there any further objectives that you would wish to see added or amendments made?

Yes, these are the right objectives

COMMENT:

The VGS consider all the objectives to be 'right'; however, others could be added to the LP:

1) 'Agriculture' is only referred to as forming part of the 'traditional economy'; however, supporting an actively sustainable agricultural system should become a key objective, as outlined in the the government's recent 'Path to Sustainable Farming' which considers biodiversity, local food production and distribution, and support for small-scale traditional family farms: <https://tinyurl.com/yrayctsf>

doc: <https://www.gov.uk/government/news/government-unveils-path-to-sustainable-farming-from-2021>

2) 'Young people' are scarcely mentioned and 'future generations' only once; issues such as

'more housing' or 'climate change' only imply a concern with the next generation; rather, the interests of young people and real long-termism should be made a key objective, on the lines of the Well-being of Future Generations (Wales) Act 2015:

<https://tinyurl.com/6ar7m7cp>

doc: <https://www.futuregenerations.wales/wp-content/uploads/2017/02/150623-guide-to-the-fg-act-en.pdf>

doc: <https://www.legislation.gov.uk/anaw/2015/2/contents/enacted>

Question 2 - The scope of the local plan

In paragraph 2.2 of the Issues and Options report we propose producing a single plan, but it would be possible to produce a series of plans to cover the different issues. Do you think we should?

Which option do you think we should take?

Option 2 - Multiple Plans. Produce a plan that deals with strategic matters (the bigger stuff) first and then subsequent plans that deal with more local concerns and detailed matters later

COMMENT:

Having one large plan covering all the items might not be the most useable format, whereas theme-based plans might be less weighty to use.

Question 3 - Neighbourhood Plans and the new Local Plan

Neighbourhood plans have been agreed for many of our neighbourhoods and more are in preparation. In paragraph 2.11 of the Issues and Options report we explain the role of neighbourhood and their relationship with the local plan.

How do you think we should make best use of existing neighbourhood plans to inform the new local plan that we are producing?

COMMENT:

We welcome the District Council's desire to make the process as bottom-up as possible, building on the wealth of guidance and input from local communities. We recommend that the LP should provide specific references to policy recommendations from individual NPs, citing continuing dialogue leading to consensus in the creation of a LP that demonstrably confirms, rejects, modifies or introduces policies derived from NPs.

Recent government guidance considers the relationship between the LP and NPs (Paragraph: 006 Reference ID: 61-006-20190723): <https://tinyurl.com/79mbaps3>

doc: <https://www.gov.uk/guidance/plan-making>

This submission from the VGS includes a pdf document which provides specific references to the Sid Valley NP's own policies: these both inform the VGS's own submissions and point to directions the East Devon LP could take.

Chapter 3: Health and Well-being

Question 4 - Planning for health and wellbeing

In Chapter 3 of the Issues and Options report we set out the health and wellbeing benefits of active lifestyles and the ways in which planning can promote this

How important do you think it is that we should actively promote health and wellbeing throughout our new local plan?

Absolutely essential

COMMENT:

It is through long-term planning that real, positive impacts on health and well-being can be realised.

- Urban green spaces: The concept of 'urban acupuncture' can help promote urban regeneration at a local level: "Pocket parks and community gardens are a relatively inexpensive investment in the urban environment... These interventions are proven to have significant benefits for the mental health of citizens." <https://tinyurl.com/vxn4hc8k>

- Biodiversity: EDDC's "Life on the Verge" project is to be welcomed, as through a new appreciation of "the benefits of biodiversity for nature and our mental health, people are coming around strongly to the idea that 'messy is good'". <https://tinyurl.com/3zwp5fw9>

- Built heritage: A recent study finds that historic places, assets – and associated activities and interventions – can have a wide range of beneficial impacts on the physical, mental and social wellbeing of individuals and communities. <https://tinyurl.com/yu7h6cc4>

doc: <https://whatworkswellbeing.org/wp-content/uploads/2020/01/heritage-briefing-20-MARCH.pdf>

doc: <https://whatworkswellbeing.org/wp-content/uploads/2020/01/Heritage-scoping-review-March-2019.pdf>

Chapter 4 - Climate emergency

Question 5 - Energy efficiency of new buildings

Option 1 - Plan for net-zero carbon from plan adoption. This would require all new development to be net-zero carbon upon adoption of the plan. However, it would be at a cost and as a consequence we may see less affordable housing built and maybe fewer other social and community benefits from development.

COMMENT:

It is not the case that more net-zero carbon housing means less affordable housing: North Somerset have agreed to a Passivhaus development with 30 % affordables:

<https://tinyurl.com/yyvxxsjn>

Exeter has been a pioneer: <https://tinyurl.com/n9ab6cp3>

At 4.4, LP provides no suggestions on 'minimising emissions in the design and construction of new developments'.

The LP needs to be more ambitious with zero-carbon standards for new-builds:

<https://tinyurl.com/499yb2n5>

The LP should insist new-builds go well beyond 'net zero carbon for operational energy':

<https://tinyurl.com/3yen6wmr>

It should embrace circular construction approaches to fundamentally cut the use of carbon: <https://tinyurl.com/2maz6pxm> and <https://tinyurl.com/477m5r7n>

Question 6 - Provision of solar arrays/farms and windfarms

Paragraphs 4.5 to 4.7 of the Issues and Options report deals with maximising energy from renewable sources. Question 6 seeks your views on what level of support we should give.

Option 2- Not identify areas but offer general support

COMMENT:

It should be up to the Town Council, in consultation with its own residents and with reference to the NP, to determine the sites for any large-scale renewable energy schemes; as this is always such a potentially-divisive issue, it would be much better to garner support for such schemes locally rather than for them to be seen to be imposed by a higher authority.

However, to encourage Town Councils to take responsibility for finding sites, they could be asked to submit an Energy Descent Plan, as developed by the Transition Towns Movement:

<https://tinyurl.com/2u2pfyup>

doc: <https://www.dropbox.com/s/oqgbi16b51jhcuu/Totnes%20EDAP%20%28c%29%20Transition%20Town%20Totnes.pdf?dl=0> (2010)

doc: <https://www.resilience.org/stories/2006-06-07/energy-descent-action-plans-primer-0/> (2006)

Question 7 - Carbon saving measures

Paragraph 4.8 of the Issues and Options report sets out seven policy objectives for helping to achieve carbon neutrality including using 'waste heat', and promoting community led renewable energy schemes.

Yes, the appropriate carbon saving policy matters have been addressed

COMMENT:

In addition:

Re 4.8 5) The model of the '15-Minute Neighbourhood' could be actively supported: 'The concept is part of the sustainable urban design thinking and implies having all necessary amenities within a short walk, bike-ride or public transit trip. The strategy decentralizes the local economy.' <https://tinyurl.com/292zycdw>

There should be promotion of examples of real zero-carbon living – as opposed to the green-wash example of 'net-zero development' presented at a Mid Devon industrial estate:

<https://tinyurl.com/c9zsd32f>

There is guidance for policy making – from the Climate Action Plan from FOTE: <https://tinyurl.com/ykcjcvtu> and the 'One Planet Development Policy' adopted by the Welsh government: <https://tinyurl.com/4hk2en2s>

doc: <https://takeclimateaction.uk/sites/files/climate/documents/2019-10/climate%20action%20plan%20for%20councils%20pdf.pdf>

doc: <https://gov.wales/one-planet-development-practice-guidance>

There should be consideration of the 'embodied carbon' in all developments:

<https://tinyurl.com/2tssry5n>

Chapter 5: Housing

Question 8 - How many new homes should we plan for each year?

In Chapter 5 of the Issues and Options report we set out the current Government requirement for us to build at least 928 new homes a year (although this figure can change). Paragraph 5.4 explains that we would need to almost double the number of affordable homes (to 461 every year for the next 20 years) to meet current and future needs. Do you think we should?

Option 1 - Plan for an average of at least 928 new homes being built each year – This would accommodate levels of house building that accord with current Government requirements. It may mean, however, that we fall a long way short of meeting all affordable housing needs.

COMMENT:

The Sid Valley NP complies with its quota of new homes under government requirements

In addition:

Whilst this falls short of the affordable housing needed, simply increasing the commitment to new-builds will not necessarily lead to more affordables being built, as admitted in the Issues and Options report.

Population and economic growth rates have decreased since the current LP was created:

<https://tinyurl.com/2mnjnxbz> and <https://tinyurl.com/abrdhbye>

Using algorithms to determine such rates have since been discredited:

<https://tinyurl.com/a3t9znsh>

Moreover, “East Devon has over-delivered by 37%, 5% and 28% over the past three years (average 22%); by 33% overall over the past five years (1,155 excess houses).”

<https://tinyurl.com/hxcuvs5w>

Question 9 - Sites for small scale housing developments

Paragraphs 5.5 to 5.7 of the Issues and Options report sets out Government policy that at least 10% of new homes should be built on smaller sites (below 1 hectare). This provides more opportunities for smaller, local businesses and is more likely to reflect local character than mass produced homes. Do you think we should?

Option 1 - Allocate or identify land for around 10% of homes to be on small sites - this approach would meet minimum government standards.

COMMENT:

The only limit to the new LP policy is that each site should be no more than 1 hectare, which could allow for several small-scale sites being developed in the Sid Valley – and this could amount to more than 10% of new homes.

These criteria would match Sid Valley NP Policy 10 which allows for small-scale housing development, with a maximum of 15 dwellings as 'exception site' residential development of land bordering the BUAB – almost all of which lies in protected AONB.

Nevertheless, NP Policy 9 specifies that “outside of the BUAB there will be a general presumption against new residential development.”

“In the replies to the Second Household Survey as to where any building outside the BUAB should take place, only a very small proportion of respondents identified any such sites. In fact, the most popular response to this question was that any new housing should be in 'brownfield sites', within the BUAB.”

Question 10 - Planning for housing for people at all stages of their life

Paragraphs 5.8 and 5.9 of the Issues and Options report sets out the reasons for building a range of homes that can accommodate different circumstances. What approach should we take to encourage this, or is it not something the local plan should deal with?

Option 1 - We should explicitly require housing provision for people at all stages of life. This approach could place demanding standards on developers to provide housing for all stages of people lives. It could though reduce monies available to pay for other wider community benefits from development.

COMMENT:

The VGS would support these very strict requirements, as they reflect the criteria in the Sid Valley NP Policy 12:

“The requirement for property size in the intermediate housing market is mainly one and two-bedroom units to meet the needs of concealed households and those who are unable to access the market sector as a first-time buyer. There is a small level need for some three-bedroom units from existing households often due to relationship breakdown. A property size target of 50% one bedroom, 40% two bedroom and 10% for three-bedroom units should be set to meet the requirements of households in this sector. (Second Household Survey: Q34)”

Question 11: Additional housing policy objectives

Paragraph 5.10 of the Issues and Options report identifies nine additional housing policy objectives, including encouraging more self-build homes, allocating sites for retirement housing and setting minimum space standards for new homes.

Do you think these are appropriate housing policy areas to be addressed in a new local plan and are there any other major policy areas that you think we should be addressing?

Yes, these are appropriate housing policy areas to be addressed

COMMENT:

5.10 1-3) could be furthered by supporting:

- 'Passivhaus for the mass market' [eg: Norwich <https://tinyurl.com/2d9x8uxe>];
- Land Trusts [eg: Brighton <https://tinyurl.com/yjtvvbyy> and Beer <https://www.beerclt.org/>];
- housing cooperatives [eg: Brighton <https://tinyurl.com/y2kab3bz>]; and
- broader, more innovative approaches [eg: Lammas <https://tinyurl.com/2bkaxy8n> as part of the Welsh government's 'One Planet Development' policy <https://tinyurl.com/4986x9h2>]

doc: <http://www.oneplanetcouncil.org.uk/wp-content/uploads/2014/02/One-Planet-Development-TAN6.pdf>

5.10 4) contradicts the Sid Valley NP's policies on balanced/mixed communities

5.10 9) supports the Sid Valley NP on WFH

Jobs and Economy

Question 12 - Preference for location for future job provision

Paragraphs 6.4 to 6.7 of the Issues and Options report explains why much recent employment development has occurred near to Exeter and where future job growth would best be located.

We set out below a number of differing potential areas in East Devon that could accommodate future job growth and development. Please indicate your in principle levels of support for each option

12a - Continued focus on big employment sites in the West End of the District

Neither oppose nor support

12b - Encouraging greater business development in other areas close to Exeter (for example expanding Greendale and Hill Barton Business Parks)

Strongly oppose

12c - Encouraging greater business development at and within the main towns of East Devon

Strongly support

12d - Encouraging business expansion and development in the villages and across the countryside of East Devon

Strongly support

12e - Encourage and enable more home working

Strongly support

COMMENT:

12b: Even though these industrial estates are in East Devon, they very much serve the economy of Exeter - which has added to the pressure for growth; furthermore, the expansion of these can adversely affect the environment: <https://tinyurl.com/3k7zuvvc>

There is also a 'history' behind the expansion of these sites, which suggests a limit has now been reached: <https://tinyurl.com/3k7zuvvc>

12c and d: Any such business expansion should be small-scale and sustainable

12e: Policy 17 of the Sid Valley NP actively supports home working.

The rise in WFH during the pandemic would suggest that this can boost the economy of East Devon: <https://tinyurl.com/4spj5m2h> and <https://tinyurl.com/xb8j45bk>

“Enter the rural environment as a destination for those displaced from, say Canary Wharf, with an enviable work/life balance, properly equipped with resources appropriate to decentralized working.” <https://tinyurl.com/2b3sr4rc>

Question 13 - Differing jobs sectors in East Devon

Paragraphs 6.8 to 6.10 of the Issues and Options report discuss what sort of jobs the local plan should encourage, including the opportunities to attract new and emerging sectors with highly skilled jobs.

To what degree do you support, or not, the following approaches to future jobs or differing types of jobs?

13a - More jobs overall – with an emphasis on attracting new/larger employers and

inward investment in any or all sectors

Strongly oppose

13b - More high technology jobs - focussing on high technology and high skilled jobs (including in the transformational sectors).

Strongly support

13c - Local Entrepreneurs – promoting opportunities for more home/locally based/small businesses.

Strongly support

13d - Traditional Sectors - Focus on growth, resilience and diversification in our traditional sectors - such as agriculture, tourism and care

Strongly support

COMMENT:

13a: The LEP has supported inward investment, often at the expense of locally-owned SMEs: <https://tinyurl.com/2uj4d8nf>

This has led to 'clone towns': <https://tinyurl.com/9mfcy62c>

Sidmouth does not have an unemployment problem: it is “unique among local towns in that more people commute into Sidmouth to work than commute out – which gives a priority on affordable housing for key workers, rather than new employment opportunities.” <https://tinyurl.com/2k8yxhhp>

doc: <https://saveoursidmouth.files.wordpress.com/2012/06/sos-representation-in-response-to-local-plan2.doc> (pages 12/13)

13b: Research for the Sid Valley NP shows that young people would like 'interesting jobs'; that Sidmouth actively promotes the STEAM economy; and that it needs entrepreneurs and businesses attracted to a high quality of work/life balance.

13c: Economic Resilience is an extensive section of the Sid Valley NP, with local entrepreneurs and SMEs as the most important part of the economy:

<https://tinyurl.com/4ym6shhb> and <https://tinyurl.com/n2uebatm>

13d: Sustainable tourism should be supported: <https://tinyurl.com/6nhjv2jh>

Question 14 - Additional economic policy objectives

Paragraph 6.11 of the Issues and Options report identifies six areas where policies could be developed to help support the economy. These include promoting jobs close to where people live, encouraging people to patronise local businesses, supporting shared workspaces, allocating additional employment sites and links between economic development and developing a greener economy.

Do you think these are appropriate economic policy areas to be addressed in a new local plan and are there any other major policy areas that you think we should be addressing?

Yes, these are the appropriate economic policy areas

COMMENT:

16.11 1-4) The Alexandria industrial estate should be secured.

LP Policy 14.3 e) does “promote an upgrading of or new access into the Alexandria estate”.

It has scope for expansion and better access: <https://tinyurl.com/svp2mpna>

Research demonstrates its viability: <https://tinyurl.com/4buxk4yf>

There are fears that it will not be developed for local SMEs: <https://tinyurl.com/jhdstp79>

Provision of employment sites should not be 'developer-led': there are currently several sites in Sidmouth: <https://tinyurl.com/3hx833x9>

Whilst a new site at Sidford is allocated in the current LP, there are reasons for removing it: <https://tinyurl.com/s8bhaj5>

16.11 5) The Transition Town movement provides ideas: <https://tinyurl.com/9unmkrzc>
doc: <https://www.uclpress.co.uk/products/125696>

The current pandemic suggests that people would welcome a 'green new deal':
<https://tinyurl.com/35kp72k>

doc: <https://www.greennewdealuk.org/>

doc: <https://neweconomics.org/2019/01/a-green-new-deal-for-the-uk>

doc: <https://www.theccc.org.uk/2020/06/25/covid-19-can-be-an-historic-turning-point-in-tackling-the-global-climate-crisis/>

Also:

The 'Preston model' shows that local procurement can inject much into the local economy:
<https://tinyurl.com/cw25xvrt> and <https://tinyurl.com/4azy62en>

doc: <https://www.preston.gov.uk/article/1339/What-is-Preston-Model->

doc: https://www.local.gov.uk/sites/default/files/documents/5.66%20Driving%20inclusive%20growth%20in%20local%20areas_04_0.pdf

doc: <https://www.centreforpublicimpact.org/case-study/the-preston-model-of-community-wealth-building-in-the-uk>

doc: <https://thenextsystem.org/the-preston-model>

Chapter 7: Town Centres

Question 15 - Town centre uses

Chapter 7 of the Issues and Options report considers options for the roles of our town centres. Question 15 seeks your views on these options.

We set out below a number of differing potential uses and approaches to promoting town centre vitality and activity. Please indicate your in principle levels of support for each potential option or approach.

15a - Retail to dominate – support retail uses in town centres and if possible resist other uses.

Neither oppose nor support

15b - Promote mixed commercial uses - support retail as well as other commercial uses such as café's and offices

Strongly support

15c - Redefine town centres to smaller core areas – concentration on retail and commercial uses in the core and allowing much greater flexibility for other uses in peripheral areas

Strongly oppose

15d - Support change of use to housing – allow for any shops or commercial premises to be converted to housing

Neither oppose nor support

15e - Support community uses - promote more community spaces in town centres

Strongly support

15f - Leisure uses – promote new gyms and sports facilities in town centres.

Strongly support

COMMENT:

Changes in the high street are a national phenomena; to work with this the Grimsey report considers injecting services and housing into the town centre:

<https://tinyurl.com/je29asup>

The benefits of these, and of coffee shops (social centres) and charity shops (positive recycling), should be recognised: they maintain footfall, avoid empty building syndrome, attract browsing tourists and “have kept high streets alive in a very difficult climate”:

<https://tinyurl.com/92mxmun3>

Ideas for rejuvenating the high street:

- Creating places to “work, rest and play”: <https://tinyurl.com/2vh6nrbs>
- Recognising the sense of place, including a traditional mix of shops and housing: <https://tinyurl.com/yucy43xu>
- Nurturing the local character: <https://tinyurl.com/pdvv7da8>
- Repurposing empty retail stores and creating community food halls <https://tinyurl.com/fmtn4dfd>
- Creating a virtual high street: <https://tinyurl.com/aktv96df>
- Creating green spaces: <https://tinyurl.com/tckpw329>

Question 16 - Additional town centre policy objectives

Paragraph 7.6 of the Issues and Options report identifies three additional area where policies may be appropriate including the use of vacant stories over shops, resisting ‘out of town’ uses to support town centres and producing town centre masterplans to identify key areas for improvement.

Do you think these are appropriate retail and town centre policy areas to be addressed in a new local plan and are there any other major policy areas that you think we should be addressing?

Yes, these are the appropriate economic policy areas

COMMENT:

In addition:

Re 7.6 2) The Sidford industrial estate should not become a shopping centre: the planning application promised “Limiting retail space to ancillary show room space to avoid adverse effects on local retailers:” <https://tinyurl.com/fsmbept8>

Re 7.6 3) “Any mixed use or large-scale redevelopment, such as Port Royal (Eastern Town), will expect a master planning”, which has received further support: <https://tinyurl.com/333pb3xk->

There are other policy areas:

- The disappearance of high street banks could be countered by the micro-bank model of SW Mutual: <https://tinyurl.com/c8f4x2zy>
 - An e-delivery service for shops, being trialed in Exmouth, could double-up as a passenger-carrier: <https://tinyurl.com/utdbe9dk>
 - Sensitive pedestrianisation contributes to town centre vitality: <https://tinyurl.com/482ww6ju>
 - Mulhouse, France, offers an inspiring model of revival: <https://tinyurl.com/4skjpa4d>
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Chapter 8: Design

Question 17 - Designing beautiful spaces and buildings

Chapter 8 of the Issues and Options report explains how attractive places can be planned and Question 17 seeks to find out how important you think it is that this is done.

How important do you think it is that we should actively plan to create beautiful spaces and buildings?

Absolutely essential

Please provide comments below on design matters you consider to be particularly important. We would be especially interested in your views on whether we should include design codes in our future local plan for each allocated development site or whether we should make it simpler and just have general guidance.

COMMENT:

These are appropriate policy areas.

“The government’s ambition is that every council will produce a local design code and guide which it claims will give residents have a “real say” in the design of new developments in their area.” <https://tinyurl.com/zxnkmhs7>

The Sid Valley NP's Place Analysis acts as a design code: <https://tinyurl.com/5pwwu823>

Question 18 - Additional design policy objectives

Paragraph 8.8 of the Issues and Options report identifies two areas with the potential for additional policy work. These are encouraging innovative designs and incorporating wildlife friendly elements into developments.

Do you think these are appropriate design policy areas to be addressed in a new local plan and are there any other major policy areas that you think we should be addressing?

Yes, these are appropriate housing policy areas

COMMENT:

In addition:

8.8 1) Sustainability and resilience should be at the core of urban design: <https://tinyurl.com/2yd9rsrc>

Built environment professionals will need to work together: <https://tinyurl.com/ju52wtrk>
doc: <https://b80d7a04-1c28-45e2-b904->

e0715cface93.filesusr.com/ugd/252d09_3bof2acf2bb24c019f5ed9173fc5d9f4.pdf

doc: https://b80d7a04-1c28-45e2-b904-e0715cface93.filesusr.com/ugd/252d09_869foce2dc8a4a65a1b87890609ede32.pdf

The pandemic will reshape how we design our public spaces:

<https://tinyurl.com/ysvrdbwa> and <https://tinyurl.com/3az7xwmc>

There are several ideas for specific post-Covid urban design: <https://tinyurl.com/4sy3wess>

8.8 2) Require all new developments to include swift-bricks:

<https://tinyurl.com/8bbe23jw>

Incorporate trees into residential developments: <https://tinyurl.com/btf7e45j> and “all new streets should be tree-lined” <https://tinyurl.com/t54yz4pd>

doc: <https://startwithlocal.org.uk/2019/02/13/lets-fill-our-streets-with-trees/>

doc: <https://www.rtpi.org.uk/media/7919/publish-retreetfit.pdf>

Use water, vegetation, sunlight, and natural materials in developments:

<https://tinyurl.com/bvs8y6t3>

Chapter 9: Built heritage

Question 19 - The importance of conserving and enhancing heritage assets

Chapter 9 of the Issues and Options describes our heritage assets and sets out the positive impacts they can have on our quality of life and local economies.

Through a new local plan (and in the work of the council more generally) how important do you think it is that we should conserve and enhance our heritage assets?

Absolutely essential

Please provide any further comments on heritage asset conservation and enhancement below including on any specific matters you think a new local plan should address.

COMMENT:

Heritage assets are key on many levels: “Using the historic environment as an asset, and giving it new life, has been one of the cornerstones of the economic and social revival of our towns and cities.” <https://tinyurl.com/nubebtxk>

doc: <https://historicengland.org.uk/content/heritage-counts/pub/2019/heritage-and-the-economy-2019/>

The Sid Valley has more listed buildings than anywhere in Devon, apart from Exeter:

<https://tinyurl.com/s2tn2hk6>

An essential part to recognising the value of heritage assets is to undertake a local list; the SVA has been working with EDDC on its Heritage Strategy and Local Heritage Assets programme: <https://tinyurl.com/smtm4tcj> and <https://tinyurl.com/bhzhzurt>

However, due to lack of resources, this is not progressing: <https://tinyurl.com/uxr4uw8n>

The Issues and Options devotes several pages to this issue; EDDC must decide if it can provide resources to realise its ambition.

Chapter 10: Natural Environment

Question 20 - Development in protected landscapes

Paragraphs 10.3 & 10.4 of the Issues and Options report sets out the importance of protecting our protected landscapes and the potential limitations this may place on how much and where development should be placed. Question 20 seeks views on the levels of restriction you favour.

Option 2 - Allow for development to meet local needs. This would allow for limited development, specifically where it will meet smaller scale local social, housing or economic needs, it could still mean more development pressure elsewhere in East Devon.

COMMENT:

Designation of the ED AONB as a National Park would afford these landscapes greater protection, but might be too restrictive: <https://tinyurl.com/trsjz3fj>

doc: <https://www.gov.uk/government/publications/designated-landscapes-national-parks-and-aonbs-2018-review>

doc: <https://www.dorsetnationalpark.com/>

The Sid Valley NP allows for development beyond the BUAB – but only if it meets local needs; also, AONB landscapes are protected, with ‘great importance’ placed on the Sidford and Sidbury gap, for example: <https://tinyurl.com/26jyeuf9>

Nevertheless, the industrial estate at Sidford has been allowed, despite being rejected at planning as it impacted protected landscape: <https://tinyurl.com/867dwtuv>

And yet an application for a solar farm in Sidbury was rejected because “it has not been demonstrated that development in the highly protected AONB landscape is essential”: <https://tinyurl.com/3eyyy3yb>

Difficult choices will have to be made.

Question 21 - Net gains in biodiversity

Paragraphs 10.5 to 10.7 of the Issues and Options report explains the new approach of quantifying the potential impact of development on biodiversity to inform planning decisions and ensure that there is a ‘net gain’. Question 21 seeks views on the approach you would favour to gain biodiversity improvements.

In order to gain biodiversity improvements which option would you prefer?

Option 1 - On-site provision

Option 2 - Secure the habitats locally

Option 3 - Pay a cash tariff towards a strategic delivery scheme

Option 4 - A combination of the above

COMMENT:

Clearly, the best provision would be on-site, but practically speaking, this might not be possible, in which case other options will have to be found. Whereas “this is potentially a serious challenge particularly to some of the larger and more urban centric developers”, in relatively rural East Devon, this should be straightforward: <https://tinyurl.com/cmzywyz3>

However, planning will have to be alert to schemes built under so-called ‘permitted development’ rights, which would be exempt from the requirement to submit a biodiversity net gain plan: <https://tinyurl.com/3fyhbzr8>

Question 22 - Additional natural environment policy objectives

Paragraph 10.8 of the Issues and Options report identifies 10 additional themes for the natural environment that may benefit from policies in the local plan.

Do you think these are appropriate natural environment policy issues to be addressed in a new local plan and are there any other major policy areas that you think we should be addressing?

Yes, these are the appropriate natural environment policy issues

COMMENT

In addition:

- The LP should reference plans for a nature recovery network in East Devon:

<https://tinyurl.com/sp45z8t4> This is part of the push for a 'wild belt' – and the general 'rewilding of planning': <https://tinyurl.com/hnjcmmfw>

- It is welcome that the Axe and Otter Estuaries have become MCZs, although further marine conservation efforts should be considered, also in relation to commercial fishing and coastal development: <https://tinyurl.com/vxarn8xb> For example, supporting seagrass in Lyme Bay: <https://tinyurl.com/4uryaymh>

doc: <https://www.gov.uk/government/collections/marine-conservation>

- Following progress on the Lower Otter Restoration Project, similar schemes should be explored for the River Sid: <https://tinyurl.com/ybpcped>

- Fish passes should be installed on the River Sid, to allow the return of salmonids: <https://tinyurl.com/t5we49yw> Since updated: <https://tinyurl.com/48m9d28t>

Chapter 11 – Transport

Question 23 - Promoting accessibility by walking and cycling

Chapter 11 of the Issues and Options report sets out the issues for promoting sustainable transport. Question 23 seeks your views on how important you think it is that new development is sited so that it is within walking distance of services and facilities.

In order to promote walking and cycling and ensure that facilities are accessible we could adopt the possible approaches detailed below, which one would you favour?

Option 3 - A combination of options 1 and 2 – This will enable some growth where existing facilities and services are accessible and have capacity with the remainder focused on growth areas to be developed with new services and facilities.

COMMENT:

The Sid Valley NP asks for shared use paths for pedestrians and cyclists in new housing developments.

Any such development should be accompanied by comprehensive plans on how to ensure that walking and cycling are the most common modes of transport.

This could mean:

- A realisation of low-traffic neighbourhoods – which should be carried out only with sensitive consultation with communities: <https://tinyurl.com/ywvr76re>

doc: <http://betterstreets.co.uk/low-traffic-neighbourhoods-faqs-facts/>

- The promotion of the 15-minute neighbourhood – because if walking and cycling are to become the norm, then services must be truly accessible: <https://tinyurl.com/uzr675y5>

doc: https://www.c40knowledgehub.org/s/article/How-to-build-back-better-with-a-15-minute-city?language=en_US

These policy initiatives could also apply to development in established areas.

Question 24 - Additional sustainable transport policy objectives

Paragraph 11.7 of the Issues and Options report identifies 13 key issues that may need to be considered around the theme of sustainable transport.

Do you think these are appropriate sustainable transport policy areas to be addressed in a new local plan and are there any other major policy areas that you think we should be addressing?

Yes, these are appropriate sustainable transport policy areas

COMMENT:

In addition:

There should be an appreciation of lessons learnt during the pandemic. Temporary moves to give over more road space to public transport, bikes and pedestrians may give way to more permanent measures – resulting in 'car-free' spaces: <https://tinyurl.com/2eujr3wk>

Whilst the government's largest ever roads expenditure programme the UK has ever seen will increase traffic and CO2 emissions, more WFH will decrease road use and the need for new roads: <https://tinyurl.com/3ykxybw>

doc:

https://www.transportforqualityoflife.com/u/files/200710_PRESS_RELEASE_FINAL_The_carbon_impact_of_the_national_roads_programme.pdf

There needs to be more investment in cycle routes: “a report by Cycling UK found that for every pound spent on cycling and walking schemes, £13 of economic benefit is produced.” <https://tinyurl.com/w39hcbhx>

doc: <https://www.cyclinguk.org/blog/how-much-money-cycling>

Specifically, “Money and enthusiasm’ is needed to get a Sidmouth-to-Feniton bike path project off the ground.” <https://tinyurl.com/fuskcf2j>

Including the Sidford-to-Sidbury shared path, as laid out in the Community Actions of the Sid Valley NP: <https://tinyurl.com/ereu8e8r>

doc: https://sidmouth.gov.uk/images/Sid_report_1.0_low_res.pdf

Chapter 12: Infrastructure/Facilities

Question 25 - Facilities and services that are important

Chapter 12 of the Issues and Options report deals with infrastructure requirements and asks what facilities are important to people to help us prioritise what may be needed and where.

Please score the services and facilities listed below in accordance with their importance to where you live or would want to live

- 25a - Convenience store / Post Office Essential Very important Quite important Of little importance
- 25b - Supermarket Essential Very important Quite important Of little importance
- 25c - Childcare and nursery school provision Essential Very important Quite important Of little importance
- 25d - Primary school Essential Very important Quite important Of little importance
- 25e - Secondary school Essential Very important Quite important Of little importance
- 25f - Children's play area Essential Very important Quite important Of little importance
- 25g - Sports and leisure facilities Essential Very important Quite important Of little importance
- 25h - Healthcare facilities Essential Very important Quite important Of little importance
- 25i - Open spaces Essential Very important Quite important Of little importance
- 25j - Easy access to a range of jobs Essential Very important Quite important Of little importance
- 25k - Regular bus service Essential Very important Quite important Of little importance
- 25l - Train station Essential Very important Quite important Of little importance
- 25m - Paths for walking and cycling Essential Very important Quite important Of little importance
- 25n - Access to full fibre broadband Essential Very important Quite important Of little importance
- 25o - Public house Essential Very important Quite important Of little importance
- 25p - Place of worship (e.g. a church) Essential Very important Quite important Of little importance
- 25q - High quality road links Essential Very important Quite important Of little importance
- 25r - Emergency services (police, fire, ambulance) Essential Very important Quite important Of little importance
- 25s - Community hall Essential Very important Quite important Of little importance
- 25t - Youth facilities Essential Very important Quite important Of little importance

COMMENT:

The above list has not been scored.

Whilst we appreciate the usefulness of such a list being completed, in order to gauge opinion of which services are more important than others, it is difficult to prioritise, say, 'youth facilities' over a 'post office'. Ideally, all of the above should be accessible: “While the 15-minute city might seem like a utopian impossibility, many policymakers around the globe are already beginning to give their urban cores new life with better city planning, the decentralization of services and goods.” And while this might seem 'utopian' in a rural area, planning should push for this ideal: <https://tinyurl.com/4mvtpfhu>

Planning for this provision has not worked for Cranbrook: it is an 'eco-new town' no more, and not only due to its 'environmental requirements' being downgraded : <https://tinyurl.com/3v6vcnr9> ; it is largely because it has been a town without a town centre, let alone access to basic facilities: <https://tinyurl.com/5h5daktd>

Question 26 - Additional infrastructure and service provision policy objectives

Paragraph 12.9 of the Issues and Options report identifies five other infrastructure and service policy objectives.

Do you think these are appropriate infrastructure and service provision policy areas to be addressed in a new local plan and are there any other major policy areas that you think we should be addressing?

Yes, these are appropriate policy areas to be addressed

COMMENT:

These are appropriate questions to ask.

In addition:

What are the true costs of infrastructure – in particular its environmental impact?

<https://tinyurl.com/wdaje6u4>

doc: <https://www.devon.gov.uk/greeninfrastructure/strategy/principles-and-strategic-priorities-for-devon/d8responding-to-climate-change>

How can “added weight be given to all environmental policies in the current local plan”, especially with regard to infrastructure? <https://tinyurl.com/6vwhkna3>

doc: <https://democracy.eastdevon.gov.uk/mgCommitteeDetails.aspx?ID=154>

Specifically:

How can high levels of nitrogen dioxide emissions be reduced?

<https://tinyurl.com/2wu7ctz9>

doc: <http://www.eclipse.co.uk/exeter/air/case.htm>

How can airport and road expansions take air quality into consideration?

<https://tinyurl.com/3me3ea9n> For example, the Sidford industrial estate:

<https://tinyurl.com/f6ds7jfn>

doc: <https://www.who.int/airpollution/ambient/interventions/en/>

How can light pollution be kept to a minimum? <https://tinyurl.com/rcer57rj>

doc: <https://www.gov.uk/guidance/light-pollution>

doc: <https://www.nightblight.cpre.org.uk/take-action-about-local-light-pollution>

How can “embodied carbon” in buildings and infrastructure be avoided?

<https://tinyurl.com/kavtt9sb>

doc: <https://www.arup.com/perspectives/publications/research/section/circular-economy-in-the-built-environment>

doc: <https://www.worldgbc.org/embodied-carbon>

Chapter 12: Development Strategy

Question 27 - Retaining and refining the existing settlement hierarchy

Chapter 13 of the Issues and Options report considers strategic options for the distribution of new development expressed in terms of a settlement hierarchy. Question 27 seeks your views on what your preferred pattern of development would be.

Which of the following options do you prefer for a potential settlement hierarchy?

Option 1 - Same hierarchy as current local plan: 7 Towns plus Cranbrook and the 15 Villages

COMMENT:

-

Question 28 - Broad distribution of housing development

Paragraphs 13.12 to 13.14 of the Issues and Options report considers the strategic spatial options for accommodating housing growth. Question 28 asks which broad approach to the distribution of housing development you favour.

Which broad approach to the distribution of housing development would you favour in a new local plan?

Option 1 - As existing. Continue with a distribution pattern of planned new development that is in line with the current local plan – for 60% of new homes at the West End, 30% in Towns and 10% in Villages and rural areas

COMMENT:

Whilst it might seem 'unfair' to place most of the housing in the Western part of the District, the AONB areas of the District largely prevent much development elsewhere:

<https://tinyurl.com/dt58k9vk>

doc: <https://questions-statements.parliament.uk/written-questions/detail/2018-05-01/140167>

Question 29 - Future options for the type and location of development

Paragraphs 13.15 & 13.16 of the Issues and Options report sets out a range of options for accommodating development. Which do you prefer?

29a - Infilling in towns and at larger villages

Supports

29b - Building one or more additional new towns

Neither oppose nor support

29c - Planning for new villages

Neither oppose nor support

29d - Large scale (over 50 homes) urban expansions to existing towns

Strongly oppose

29e - Small scale (under 50 homes) urban expansions to towns

Support

29f - Building houses on the edges of East Devon villages

Support

COMMENT:

Sid Valley NP Policy 6 supports sensitive infilling in towns: “Development should be designed so as not to adversely impact on the amenities of its neighbours.”

Policies 9/10 recognise “any new housing should be in 'brownfield' sites, within the BUAB”; although “there are only limited opportunities for brownfield development within the town without encroaching on much valued local facilities which are to be protected by the plan’s other policies.”

It opposes infilling in the Sidford-Sidbury gap and the creation of areas of housing of over 50 units.

It supports smaller-scale expansion on the border of the BUAB under certain conditions

Question 30 - Establishment of a Development Corporation

Paragraphs 13.17 to 13.19 of the Issues and Options report explain the role that a development corporation could plan in delivering very large scale developments. Question 30 asks for view on how important you consider this would be.

If one or more big strategic sites for housing or mixed use development are allocated in the new East Devon local plan how important do you think the creation of a Development Corporation would be?

Absolutely essential Very important Quite important Of limited importance Not important at all It would be a bad thing

COMMENT:

The above has not been scored.

Question 31 - Planning for development beyond 2040

Paragraph 13.20 of the Issues and Options report considers the timeframe that the local plan should consider.

Do you consider that it would be appropriate to start to plan for development in East Devon for a date well beyond 2040 in this Local Plan?

Yes it would be very sensible whether a new town is proposed or not

COMMENT:

The County Council and District Council are looking to 2050 or earlier to become 'carbon neutral': <https://tinyurl.com/yt26xmy9>

doc: <https://democracy.eastdevon.gov.uk//documents/g143/Printed%20minutes%2003rd-Apr-2019%2017.30%20Cabinet.pdf?T=1>

Chapter 14: Any Extra Comments

Question 32 - And finally...?

Are there any big planning issues that you think we have missed in this report or are there any further comments you would like to make?

COMMENT:

This Issues and Options document has been ambitious and inspiring; through this Consultation, it is hoped that the Vision Group for Sidmouth can contribute to both the visionary nature of this stage and to the collection of further evidence and documentation

to support the positive intent of the planning authorities.
We look forward to contributing at further stages in this process.

Vision Group for Sidmouth – 15 March 2021