VGS comment on Fords planning application 18/1094/MOUT

The Vision Group for Sidmouth objects to this application on the grounds that there is no proven need for this particular business park.

We would like to refer to pages 4 to 24 of the VGS submission to the draft Local Plan of 14th January 2013 which still provide context and arguments for rejecting this application: <http://eastdevon.gov.uk/planning-libraries/representation-library/chapter2.0/720-mrjwoodwardvisiongroupforsidmouth.pdf>

In particular:

> The Tym’s Report and several entries in the draft Local Plan warn against undermining the viability of town centres. Indeed, vacating the Alexandria Road site would enable a large national retailer to establish itself: <http://www.devon24.co.uk/news/morrisons_store_rumours_surface_in_sidmouth_1_1210416> and <http://www.sidmouthherald.co.uk/news/news/morrisons_eyes_up_sidmouth_estate_1_1402454>

> The potential of the Alexandria Road site is unrealised, as highlighted by the Sid Vale Association:

“4.4. The current Local Plan identifies employment land at the Alexandria Industrial site. In the past a company, Devon Conversions, employed more than 200 people on the Alexandria Road site, which is a good indication of the extent of employment numbers that might be achieved now. We believe that the site is now underutilised.”

<http://www.sidvaleassociation.org.uk/index.php?page=sva‐response‐to‐ldp‐2012>

[http://www.eastdevon.gov.uk/plg\_representations0014‐0192.pdf](http://www.eastdevon.gov.uk/plg_representations0014%E2%80%900192.pdf)

And indeed, the largest business on this site has shown its frustration at the lack of progress in improving access:

“Mr Mike Ford (ID: 499312) , Ford Property Ltd; and

“Mr Tim Ford (ID: 499310) , Fords of Sidmouth

“I write with reference to the above report in relation to Sidmouth and specifically the Alexandria Industrial Estate. The main Alexandria Road Industrial Site is considered to have bad access and there are conflicts with nearby housing. I would like to make the point that firstly, we are here at the moment and whilst the access may well be substandard, we are prevented from improving it by the ransom strip; otherwise a satisfactory solution could be reached.”

<http://eastdevon‐consult.limehouse.co.uk/portal/pref_app?pointId=1275473463022&do=view>

> The Tym’s Report affirms that there is a substantial amount of employment land available on the market in Sidmouth: <http://www.eastdevon.gov.uk/plg_lp_edhousingstudy.pdf>

> The submission from the Sidmouth Chamber of Commerce of 28th January 2013 stated that not only is there almost no demand in the Sid Valley for B1 use, and that “Tyms concluded that capacity at Alexandria, even taking into account the access difficulties, was sufficient for the duration of the Plan period.”

> And that: “We have no rail or motorway connections, no corporate infrastructure and no existing capacity, and we do not qualify for any subsidy. We must point out that Sidmouth’s only major employer, EDDC, is currently seeking to relocate, citing as one of its reasons, the unsuitability of Sidmouth as a location on access grounds.”

> Unemployment is historically very low in Sidmouth: [http://www.rsnonline.org.uk/performance‐profiling/east‐devon](http://www.rsnonline.org.uk/performance%E2%80%90profiling/east%E2%80%90devon) (2011 census)

> It is not clear, therefore, where the figures for ‘need’ for more employment land have been derived. The Chamber of Commerce stated in its submission: “Occupancy levels are expected to continue their long term decline. The percentage of Sidmouth’s population of working age is predicted to decline quite dramatically over the Plan period. EDDC’s own figures confirm this. They show an expected 8.8% fall over the Plan period in the percentage of Sidmouth’s population who will be of working age.

“The number of working people in Sidmouth is therefore set to FALL quite significantly over the next fifteen years. So we conclude that there will be no demand arising from population changes and house building over the Plan period. Indeed, demand may well decline.

“Nor is there much slack in the labour market that needs to be taken up. Unemployment levels in Sidmouth and the surrounding area are historically very low, and remain so despite the recession.”

> Sidmouth is the only settlement (besides Axminster) in East Devon which has more people commuting into town for work: the Chamber carried out detailed analysis of the figures, concluding that “taking into account very low unemployment, and a declining population of working people… the majority [of the workforce] will undoubtedly be sucked in from outside the town, thus INCREASING commuting.”

> The applicant was part of a committee set up by the now-disbanded East Devon Business Forum to push for a larger allocation of employment land in the draft Local Plan. The influence of the EDBF on proposals for employment land in the draft Local Plan should be considered. In January 2007, a Sub-Committee was established by the Forum to consider ‘amending the Atkins report’; this included the Sidmouth business now seeking to develop the proposed site at Sidford: <http://www.eastdevon.gov.uk/250107.pdf>

It appears that a group of business people comprising this Forum reviewed the publicly-funded Atkins Report and then determined that the employment land provisions were insufficient; they subsequently proceeded to derive their own projections, which the District Council then adopted as "evidence" for the increased employment land figure which ensued: <http://www.eastdevon.gov.uk/310108edbf.pdf>

A member of this group which lobbied successfully for more employment land will now benefit directly from the considerable inflation of employment land which was then accepted in the Local Plan – should this planning application 18/1094/MOUT be granted.

<http://futuresforumvgs.blogspot.com/2018/06/sidford-business-park-and-east-devon.html>

We would also like to refer to the VGS comment on Fords planning application 16/0669/MOUT of 16th September 2016, which is of direct relevance to the current application: <http://futuresforumvgs.blogspot.com/2016/09/vgs-comment-on-fords-planning.html>

THE APPLICATION IS NOT APPROPRIATE

In a recent case it was made clear that any development on Green Belt would be deemed ‘inappropriate’ as it would impact ‘visual amenity and other harm i.e. nature conservation’.

[HTA | The meaning of appropriate development in the green belt.html](https://hta.org.uk/resourceLibrary/the-meaning-of-appropriate-development-in-the-green-belt.html)

Whilst the ED AONB is not ‘green belt’, the status can be regarded as conferring greater protection, on par with that of National Parks:

[Protected sites designations](http://jncc.defra.gov.uk/page-1527)

THE APPLICATION DOES NOT REPRESENT SUSTAINABLE DEVELOPMENT

Government guidelines emphasise the need to balance the “three dimensions to sustainable development”:

“These roles should not be undertaken in isolation, because they are mutually dependent. Economic growth can secure higher social and environmental standards, and well-designed buildings and places can improve the lives of people and communities. Therefore, to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system. The planning system should play an active role in guiding development to sustainable solutions.”

[Achieving sustainable development | Planning Practice Guidance](http://planningguidance.communities.gov.uk/blog/policy/achieving-sustainable-development/)

This Application fails in that:

> it has not been proven that it will ‘secure higher social and environmental standards’, as the higher traffic levels will clearly impact on such standards;

> the buildings are clearly not ‘well-designed’, as their visual impact will be felt well beyond the immediate area;

> the development will not ‘improve the lives of people and communities’ as local residents who are supposed to benefit directly have been clear in their opposition to these proposals;

As argued in the final VGS submission to the draft Local Plan, the introduction to that document omitted ‘the essentials for planning long term sustainability’ and this omission is clearly felt in this Application: ‘for example in relation to agricultural land for food security, integrating employment land with residential provision, preserving flood plains and wetlands, … mitigating the effects of climate change, retaining the economic and environmental assets that underpin the local tourist industry, providing opportunities for skills and training relevant to the local economy, or planning the infrastructure of the district in relation to flood control, drainage and sewage control, traffic management etc.’

[Vision Group for Sidmouth - Vision Group comment on draft Local Plan](https://www.visionforsidmouth.org/news/2015/june/vision-group-comment-on-draft-local-plan.aspx)

THE APPLICATION IS OVERDEVELOPMENT

The increase in traffic resulting from this proposed development threatens to increase air pollution, a problem which is only slowly being considered by the authorities:

[Air pollution 'worse' than passive smoking for health, Exeter council official warns | Exeter Express and Echo](http://www.exeterexpressandecho.co.uk/air-pollution-worse-passive-smoking-health-exeter/story-26119152-detail/story.html) and

[New Air Quality initiative launches in Exeter | Transition Exeter](http://www.transitionexeter.org.uk/node/313)

In the VGS submission to the draft Local Plan of January 2013, considerable evidence was provided to show that this proposed development is actually not necessary: ‘Sidmouth does not suffer from the problem of all other towns in East Devon (other than Axminster) which seek to ‘reduce out-commuting’; in which case, Sidmouth does not need to ‘create more local jobs’ on the large scale proposed in the Local Plan.’

Moreover, the Local Plan’s recommendations for “modest employment growth” for Sidmouth are contravened by this Application: ‘In the context of the Sidmouth economy this does not represent ‘modest employment growth’: rather, it amounts to substantial overdevelopment, as unemployment is historically particularly low in Sidmouth.’
[REPRESENTATION TO LOCAL PLAN - final version - vision group for sidmouth - 14jan13](https://www.visionforsidmouth.org/media/65397/representation-to-local-plan-final-version-vgs-14jan13.pdf)

Finally, the applicant says *"Sidmouth needs new employment space as areas such as the Alexandria Estate were full."*
[New business park plan is unveiled | Latest Sidmouth and Ottery News - Sidmouth Herald](http://www.sidmouthherald.co.uk/news/new-business-park-plan-is-unveiled-1-5522422) and [Business park plans back on the table for Devon beauty spot - Devon Live](https://www.devonlive.com/news/devon-news/business-park-plans-back-table-1573481)

This was said five years ago to support the application then:
[FORDS: ‘Our £5million Sidmouth jobs vision’ | Latest Sidmouth and Ottery News - Sidmouth Herald](http://www.sidmouthherald.co.uk/news/fords-our-5million-sidmouth-jobs-vision-1-1402540)

The Town Council does not agree:*“The proposed development could adversely affect the economic viability of Sidmouth's town centre and the need for the development had not been proven with the existing employment site at Alexandria Road still having capacity.”*
[Unanimous town council objection against new Sidford business park plan - Devon Live](https://www.devonlive.com/news/devon-news/unanimous-town-council-objection-against-1632728)

Indeed, a study by Graham Cooper from five years ago made the point very clearly and very comprehensively - and is still as relevant to the current application:

<http://futuresforumvgs.blogspot.com/2018/06/sidford-business-park-need-for.html>

submitted by Jeremy Woodward

on behalf of the Vision Group for Sidmouth: 14th June 2018

23 Harcombe Lane, Sidford, Sidmouth, EX10 9QN