

East Devon Local Plan – Regulation 19 Publication Draft (February 2025)

Representations on behalf of **Bloor Homes**
Exeter [*Land at Sidford High Street, Sidmouth*]

March 2025

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Jeff Richards

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Client

Bloor Homes Exeter

Our reference

BLOA3007

March 2025

1. Introduction and Summary

Introduction

- 1.1 This response has been prepared by **Turley** on behalf of **Bloor Homes Exeter** [“Bloor Homes”], to provide representations to East Devon District Council [“the Council”], in relation to the East Devon Local Plan [“EDLP”] Regulation 19 consultation March 2025.
- 1.2 Bloor Homes control **Land at Sidford High Street, Sidmouth** as previously submitted to the Council during previous plan making stages. The land controlled by Bloor Homes amounts to some 19.34ha and has been assessed during the preparation of the Local Plan with reference numbers Sidm_02 and Sidm_35. This land to the North of Sidmouth could provide a net residential area of around 6.4ha and up to 200 new homes, including affordable housing. Development at this site could also contribute substantial Green Infrastructure, including new areas of public space, providing additional amenity for this part of the town and linking into the wider designated landscape in this part of East Devon.



Figure 1 - Land at Sidford High Street, Sidmouth

- 1.3 Should any further information be required as a result of or to support this response, then please do not hesitate to contact us.

2. Policy Responses

Strategic Policy SP01: Spatial strategy [Comments]

- 2.1 In respect of the component of the Spatial Strategy that confirms Sidmouth as a Main Centre this is supported, as Sidmouth is clearly a main town within East Devon (with strategic and local facilities) and a logical location meet a proportion of the District's development needs, and meet needs arising in the wider surrounding areas.
- 2.2 This position is supported by the Council's evidence, including the Role and Function of Settlements report (GEV-001), which records that Sidmouth benefits from all of the assessed strategic and local facilities and services, other than a train station. This very clearly distinguishes it (with some, but not all, of the other Main Centres) from the other lower tier settlements and suggests that the proportion of new development at Sidmouth should be elevated when compared to the other lower tier settlements.
- 2.3 It is not clear that the status and potential for development at Sidmouth has been reflected in the policies and allocations in the plan, where other lower tier settlements are being proposed for higher levels of development. This includes having regard to Sidmouth as an existing centre of population, with the second highest resident population in the District (only behind Exmouth), specific pressures on affordability (and so the need for further affordable housing delivery) and with demographics skewed towards an ageing population (with additional pressures on housing supply and the ability to provide housing for economically active residents to support the health and vibrancy of the town). In this respect it is not clear that the spatial strategy has been followed and is effectively informing the policies and approach for the plan as a whole.
- 2.4 The delivery of just 333 homes over the 15 years of the plan period at Sidmouth (as housing trajectory at Appendix 2 of HOU-001) will unlikely be sufficient to meet local needs across the same period and is not a proportionate response to the role and function of Sidmouth as a key main centre within East Devon.
- 2.5 The Council has within the plan acknowledged that further land (located within designated landscapes, including the National Landscape) will need to be released for residential development. Sidmouth is a constrained settlement, surrounded by the designated National Landscape and other constraints (including Coastal Protection zones), with a lack of sufficient suitable development opportunities within the existing settlement, and/or on previously developed land. However, these constraints need to be balanced with the settlement's high sustainability credentials, it is therefore an area of suitable for additional growth, to support and in accordance with the spatial strategy at SP01.

Strategic Policy SP02: Levels of future housing development [Object]

- 2.6 Paragraph 3.9 within the plan states that the policy “*responds to the Council’s priority of addressing housing needs by establishing a clear housing requirement based on the Standard Method using latest ONS statistics*”. This does not seem to be the case as the Council is seeking to progress its plan using the transitional arrangements available as part of the NPPF (December 2024), by making provision for only 80% of the housing need which is now identified by the latest version of the Standard Method. The approach being taken by the plan (and specifically **Policy SP02**) is not consistent with the Council’s stated aim and approach as recorded at Paragraph 3.9. This in turn is not consistent with national planning policy that seeks to boost significantly the provision of new housing.
- 2.7 The level of housing being planned for by the plan is not consistent with latest national policy on need (as reflected in the up-to-date standard method for Local Housing Need), with even the annual provision in the later years of the plan (1,070dpa based on a stepped trajectory) less than the new minimum figure of 1,118dpa which is derived from the latest version of the Standard Method, and which is the basis for the 80% minimum threshold to progress using transitional arrangements.
- 2.8 Although no specific unmet need has yet been identified to exist, the Council’s approach also makes no provision for any unmet needs for housing, that may arise within the City of Exeter, and where East Devon District may be well placed to meet those needs. The preparation and examination of the Exeter Local Plan will be occurring in parallel with that in East Devon and so there will remain a need to retain flexibility and act responsively in the interests of planning for this important part of Devon and wider South West.

Strategic Policy SD06: Sidmouth and its development allocations [OBJECT]

- 2.9 There is clear potential for more development to be accommodated at Sidmouth to meet local needs, where the plan for East Devon could and should be doing more to deliver elevated levels of new housing, including affordable housing.
- 2.10 It is not clear that the status and potential for development at Sidmouth has been reflected in the policies and allocations in the plan, where other lower tier settlements are being proposed for higher levels of development. This includes having regard to Sidmouth as an existing centre of population, with the second highest resident population in the District (only behind Exmouth), specific pressures on affordability (and so the need for further affordable housing delivery) and with demographics skewed towards an ageing population (with additional pressures on housing supply and the ability to provide housing for economically active residents to support the health and vibrancy of the town). In this respect it is not clear that the spatial strategy has been followed and is effectively informing the policies and approach for the plan, as a whole.
- 2.11 The delivery of just 333 homes over the 15 years of the plan period at Sidmouth (as housing trajectory at Appendix 2 of HOU-001) is not a proportionate response to the role and function of Sidmouth as a key main centre within East Devon.
- 2.12 The Council has within the plan acknowledged that further land (located within designated landscapes, including the National Landscape) will need to be released for residential development. Sidmouth is a constrained settlement, surrounded by the designated National Landscape and other constraints (including Coastal Protection zones), with a lack of sufficient suitable development opportunities within the existing settlement, and/or on previously developed land. However, these constraints need to be balanced with the settlement's high sustainability credentials, it is therefore an area of suitable for additional growth, to support and in accordance with the spatial strategy at SP01.
- 2.13 The evidence that supports the plan has shown that development on greenfield sites at and around the town of Sidmouth (and in other locations) is necessary and justified in order to meet needs arising in the District during the plan period. This includes development on land within designated landscapes, including the National Landscape.
- 2.14 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 172 homes, at a capacity of 127, 30 and 15 homes respectively). A range of other sites have been discounted as being unsuitable, or less preferable, than those that have been selected.
- 2.15 The excluded sites include 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, 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 or possible as part of development associated with the sites selected as part of the LP consultation.

- 2.16 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.
- 2.17 The rejection of this site as an allocation at Sidmouth has been based primarily on adverse landscape effects and impacts. These effects and impacts are assessed in the technical note (prepared by EDP) which was previously submitted to the Council and is appended to these representations. This note summarises that:
- In respect of sites Sidm_02 and Sidm_35, 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;
 - There is no reason, nor any objective assessment within the evidence base to preclude the Site's allocation for residential development;
 - 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 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;
 - 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 proposed Local Plan (Sidm_01).
- 2.18 The proposed plan is accompanied by a Sustainability Assessment [CSD-003] 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 those selected as preferred allocations. The selected site Sidm_01 is assessed to have a major negative effect in the same way as the rejected sites North of Sidmouth and Sidford High Street, but where there are not able to be the same level of landscape and Green Infrastructure enhancements (including mitigation).

Strategic Policy HN01: Housing to address needs [OBJECT]

- 2.19 **Policy HN01** seeks to provide an “appropriate mix” of homes across East Devon during the plan period. Whilst this aspiration is supported overall, as drafted the policy is not clear and will not be effective, as the way in which the mix for developments will be prescribed, assessed or controlled is not clear.
- 2.20 If it is intended that the provisions of the mix suggested by Parts A-E will be derived via other policies of the plan (including where relevant site allocations) then this should be clearly stated, with other aspects of housing mix (for the open market element of standard major housing proposals) having regard to available evidence of need, but fundamentally information available to developers in respect of local housing demand and supply, where those delivering housing are best able to assess the types of housing that are appropriate at different sites and different stages of phased developments.
- 2.21 As drafted **Policy HN01** is not clear, nor justified and should be modified to ensure that it is effective.

Strategic Policy HN02: Affordable housing [Comments]

- 2.22 It is agreed that relevant affordable housing provisions should be made within the plan as part of supporting communities across East Devon and to meet needs arising during the plan period.
- 2.23 To complement the approach being taken by **Policy HN02** it would be useful if the policy or the supporting text (associated with this policy) clarified the level of affordable housing provision which is being targeted via the plan (and its associated policies) and how this is meeting the evidenced levels of need arising via the Council's Local Housing Needs Assessment (HOU-002).
- 2.24 Elsewhere in the plan (at Paragraph 3.10) it is stated that the affordable housing target for the plan is some 4,400 new affordable homes; however, this is significantly short of the stated need (from HOU-002) at around 8,000 affordable homes or around 400 new affordable homes per year. It is also likely that at some locations in particular, such as Sidmouth, the level of affordable housing to be delivered via policies in the plan will be significantly short of evidenced levels of need, where the recently completed Local Housing Needs Assessment (undertaken for Sidmouth Town Council) which found that "There is significant need for additional affordable housing, both for general needs and special need for older people in Sidmouth on an annual basis". This need was quantified to be around 65 new affordable homes per annum (current policies would provide for only this amount over the plan period as a whole, rather than each year).
- 2.25 The plan as drafted is unlikely to be making provision to meet all of the identified affordable housing needs via **Policy HN02** and accounting for other mechanisms for affordable housing delivery. This points to the plan needing to provide for higher levels of housing growth overall, consistent with the objective stated elsewhere to "*maximise the delivery of affordable housing across East Devon*" and this should be reviewed further by the Council. This is specifically relevant for Sidmouth where housing delivery is below the levels that would be expected for this main centre and where there are specific and acute needs for local affordable housing provision.

Policy HN05: Self-build and custom build housing [OBJECT]

- 2.26 There is not sufficient evidence to support the Council's approach to **Policy HN05** and it needs to be deleted or substantially modified. By providing 5% of new dwellings on all developments over 20 homes as self or custom build housing, the policy would be seeking to deliver far more self and custom build homes than evidence suggested is needed. The Council's self-build and custom build monitoring information (lined as footnote 45 within the plan and document HOU-017) is out of date and in any event show only around 200 entries for people interested in self and custom build housing options. This is significantly less than the level of provision that would be secured from the 5% requirement being suggested by **Policy HN05**.
- 2.27 Rather than a blanket approach to self and custom build provision as part of all larger residential developments, the plan should be taking a more refined approach to identifying those sites that are most suitable to the types of self and custom build homes that are attractive and valuable for those interested in this provision, including projects that would be attractive to Community Led Housing Groups, Community Land Trusts and Cohousing groups (as identified in the supporting text at 8.21 of the plan).
- 2.28 There is no evidence to show that the generic approach being proposed by **Policy HN05** would meet the needs of those interested in self and custom housebuilding options, either in respect of the total quantum, or the types of sites (plots) that may be made available.
- 2.29 If there is intended to be provision as part of larger strategic development sites (which often results in limited take up), then this can often only be meaningfully achieved via the provision of "shell homes" following a 'custom build' model, where future occupiers have the option to significantly influence the internal layout and fitout of these buildings including the way in which internal works are procured and progressed. Other options for fully self-build plots often result in significant phasing, completion, infrastructure and health and safety issues, where the timing and rate of construction is not able to be controlled alongside the build out of the other parts of the development.
- 2.30 In all cases where self or custom homes or plots are secured as part of any planning permission, then there should always be 'cascade' mechanisms included to ensure that these homes/plots can revert to standard models of provision after an appropriate marketing period (not more than 12 months).
- 2.31 As drafted **Policy HN05** is not sound as it is not supported by appropriate robust evidence and is not justified. If the policy is to be retained then it should be substantially modified to better reflect evidenced levels of need in East Devon for self and custom build housing, and how this can be provided in a way that meaningfully contributes to meeting those needs, and not adversely impacting on the capacity and delivery of all major housing sites.

Strategic Policy DS01: Design and local distinctiveness [OBJECT]

- 2.32 **Policy DS01** (part D) requires that new development is designed to meet “nationally and locally described space standards”. There is no in principle objection to this requirement for development designed to meet Nationally Described Space Standards [“NDSS”], which is in alignment with the approach to a clear single national standard advocated in government policy/guidance.
- 2.33 However, it is not clear from the plan what other locally described space standards are intended to apply and if/how these differ from NDSS. The plan policy, supporting text and associated evidence base documents contain no details in respect of what additional locally described standards might apply and what these standards are. There would be no way for an applicant to know what local standards are expected and no opportunity for the Council to test the viability implications of this standard, if it is not clearly defined. On this basis the policy is not justified and not effective (so not sound) and this element should be deleted.

Policy DS02: Housing density and efficient use of land [OBJECT]

- 2.34 As drafted **Policy DS02** is not justified and will not be effective. Not all major development schemes would require the production of a design code, as is stated by the policy. The plan does not, either via the policy or the supporting text, provide justification for the requirements that are contained within the policy.
- 2.35 Major developments are (as is referenced elsewhere in the plan) those which (in respect of residential development) propose 10 or more dwellings or are on a site of greater than 0.5ha. There are many instances where developments of this scale would not require a design code to have been produced in order to be granted planning permission (such schemes may be proposed via full planning application which enable the Council to fully assess the detailed design of the development). Additionally, there are instances where larger scale development may come forward as part of a large major development, but where a design code is not necessary, such as the delivery of infrastructure or larger scale employment development which might be part of a mixed use development allocation.
- 2.36 Whilst the intent of **Policy DS02** around density and the efficient use of land is supported, the detailed around design codes is poorly constructed and won't be effective. Alternative policy provision should be made around the use of Design Codes if this is necessary to support the implementation of the plan as a whole, where there should be greater clarity about how design codes are to be used and the types and scales of development that are relevant. The plan should also clarify the Council's intentions in respect of District wide design codes that it will produce in order to support the policies in the plan (there is no clarity on this point currently within the text that supports **Policy DS02**, although there are references to the intention for a District Design Guide linked to **Policy DS01**).

Strategic Policy PB05: Biodiversity Net Gain [OBJECT]

- 2.37 The proposed policy requirement for all major development proposals to deliver Biodiversity Net Gain ["BNG"] of at least 20%, as per **Policy PB05**, is fundamentally inconsistent with the national approach on this matter as set out within National Planning Policy, Guidance and Legislation. There is no compelling evidence to support the need for East Devon to target gains at this elevated level where development proposals would otherwise be mandated to demonstrate and secure measurable net gain for biodiversity at the level of at least 10%. There may be instances where additional gains can be achieved, but this should not be set as a requirement for all major developments, and there will be other ways that the District Council is able to pursue its aims in respect of nature recovery (in a way that is complementary to and in parallel with the controls that are imposed on new major development projects).
- 2.38 Planning Practice Guidance is very clear and states (at Paragraph: 006 Reference ID: 74-006-20240214) that:
- "Plan-makers should not seek a higher percentage than the statutory objective of 10% biodiversity net gain, either on an area-wide basis or for specific allocations for development unless justified. To justify such policies they will need to be evidenced including as to local need for a higher percentage, local opportunities for a higher percentage and any impacts on viability for development."*
- 2.39 The Council has provided no compelling or thorough justification to support a policy requirement that seeks a higher percentage than the statutory minimum of at least 10% (either in respect of need, opportunity or viability impacts) and so this policy is fundamentally unsound.
- 2.40 Whilst it is acknowledged and positive that development can and should make contributions to addressing biodiversity decline and nature recovery (as is required by national policy) the Council has not produced compelling evidence of need that is specific to East Devon and justifies the proposed policy requirement. The need to contribute at least 10% BNG via new major development proposals is established via the statutory BNG framework and there is not any need to go further via the policies in this Local Plan.
- 2.41 The viability impacts of providing elevated minimum levels of BNG have also not been robustly assessed, where the higher costs (stated as 19% within the Council's Viability Assessment) to achieve 20% BNG will have a significant impact on the viability and delivery of development sites across East Devon (including the key site allocations within the plan on which the Council relies to meeting housing and other development needs). As noted within the Council's assessment the ability to deliver high levels of BNG, and also the potential for additional costs arising, are site specific *"depending on both the existing site characteristics and the ability of development form to both mitigate and provide additional gain"*, with the conclusion that it is therefore *"difficult to gauge a suitable allowance for meeting the requirements"*.
- 2.42 Not only is it clear that the possible cost and viability impacts of this policy have not been robustly assessed (so as to be shown to be soundly based and compatible with the plan as a whole), it is not clear how the policy requirement has been considered and tested as part of the process of identifying the various development site allocations that form

a fundamental component of the plan. Given that at this stage there is not detailed baseline assessment available of all of these sites, the land or other requirements to achieve this policy, whilst meeting the capacity expectations for development from these sites is far from clear. It is possible that in many cases requirement to provide at least 20% BNG on an allocated development site would have the effect of either significantly reducing the capacity for development (where this requirement is being met on site), or an off-site solution is proposed (via an offsetting solution and the use of credits) an additional financial cost that puts further pressure on the timely delivery of development and the provision of other planning obligations.

- 2.43 Given the above **Policy PB05** should be significantly modified to ensure that it is sound. This is primarily on the basis that a requirement for at least 20% BNG is not justified in terms of being necessary, viable and in terms of the impact it may have on how the plan will secure other sustainable development objectives. As part of any modification to Policy PB05 there should also be a further critical review to ensure that any elements of the policy that may remain, only do so on the basis that they complement rather than duplicate the statutory framework for BNG. Beyond the headline objective of seeking an elevated level of minimum BNG, much of Policy PB05 is unnecessary as it duplicates aspects of the statutory regime for BNG and matters that would be covered through the submission, approval and implementation of Biodiversity Gain Plans (linked to relevant planning permissions).
- 2.44 Unmodified **Policy PB05** would have a significant impact on the potential for East Devon to deliver the development requirements and other policy objectives set in the plan. The statutory framework now exists to ensure that all qualifying new developments make a meaningful contribution to address nature recovery goals by contributing at least 10% BNG. The Council can do more to go further, including encouraging higher levels of BNG where this is both feasible and viable, but this should not be linked to major development proposals via Development Plan policy in the way suggested by this policy.

Policy PB07: Ecological enhancement and biodiversity in the built environment

[OBJECT]

- 2.45 There are two parts of **Policy PB07** which are of concern as drafted and should be modified or deleted to ensure that the policy is justified, effective and sound.
- 2.46 Part C of the policy requires that all major planning application should provide an integrated bat loft, if ecologically relevant. The basis for this policy (to require one integrated bat loft on any size major development, from two houses on a site area over 0.5ha or 1,000s of new homes proposed as a major development, seems to be irrational and not clearly justified. There is also a lack of clarity around how, where and why this feature might be considered to be “*ecologically relevant*”. The potential delivery implications of this feature, including ongoing management/maintenance (and enforcement of this), does not seem to have been considered as part of devising the policy wording. It would seem preferable to omit this element and use Part B in order to secure appropriate features for the use of bats within new development. This part of the policy could even possibly be strengthened to prescribe the rate at which new bat box provision should be made.
- 2.47 Part E of the policy requires that all major developments should provide overhanging eaves suitable for nesting house martins. This requirement provides no flexibility and assumes that all developments (or all scales and typologies) will be able to provide this feature and that it would be architecturally appropriate to do so. This will not always be the case and so the requirement needs to be omitted as it is not justified. In any event the provision of integrated bird boxes is dealt with by Part A of the policy.

Policy PB09: Monitoring requirements for new planting schemes [OBJECT]

- 2.48 **Policy PB09** as drafted introduces a requirement on major developments for the placement of a financial bond (prior to the commencement of construction), equal to 25% of the calculated planting cost for the scheme (or agreed phase). The bond would be released only following the certified completion of relevant planting works and following 5 years of monitoring by a landscape architect. This requirement is onerous and unjustified and presents a potentially significant financial burden on development that has not been accounted for in the Council's viability assessment.
- 2.49 On very large or even moderately sized major development schemes, the financial bonds required could be sizeable – many hundreds of thousands of pounds. Whilst the Council's financial viability assessment seems to have accounted for the need for planting schemes as part of the standard landscaping (plot or site infrastructure) costs (as would be expected), the additional costs associated with bonds have not been.
- 2.50 Bloor Homes is an experienced developer of new homes and major new developments across various parts of the South West and rest of England. There are nearly always controls imposed on the grant of relevant planning permissions to ensure that the design, implementation and maintenance of new landscape planting is secured. However, in no locations has Bloor Homes experienced the need to provide a financial bond to underwrite this provision.
- 2.51 Notwithstanding issues relating to cost/viability (and the robust assessment and testing of this), the supporting text for **Policy PB09** does not seek to provide any reasoned justification for the requirement in the policy for a financial bond. The use of planning conditions can appropriately secure the implementation of landscaping as part of new development, with provisions identified (where necessary) for the longer-term management and maintenance of new landscaped spaces (either via transfer for adoption to relevant public authorities, or the use of appropriate management companies). There is no supporting evidence or justification for the Council's proposed policy requirement for financial bonds to secure the implementation of planting schemes.
- 2.52 **Policy PB09** should be deleted or substantially modified in order to be sound, it is not necessary (so not positively prepared or effective) and not justified.

Appendix 1: Vison Document

A VISION FOR LAND AT

Sidford High Street

Sidmouth

New Homes with Public Park

AUGUST 2022



Turley

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.

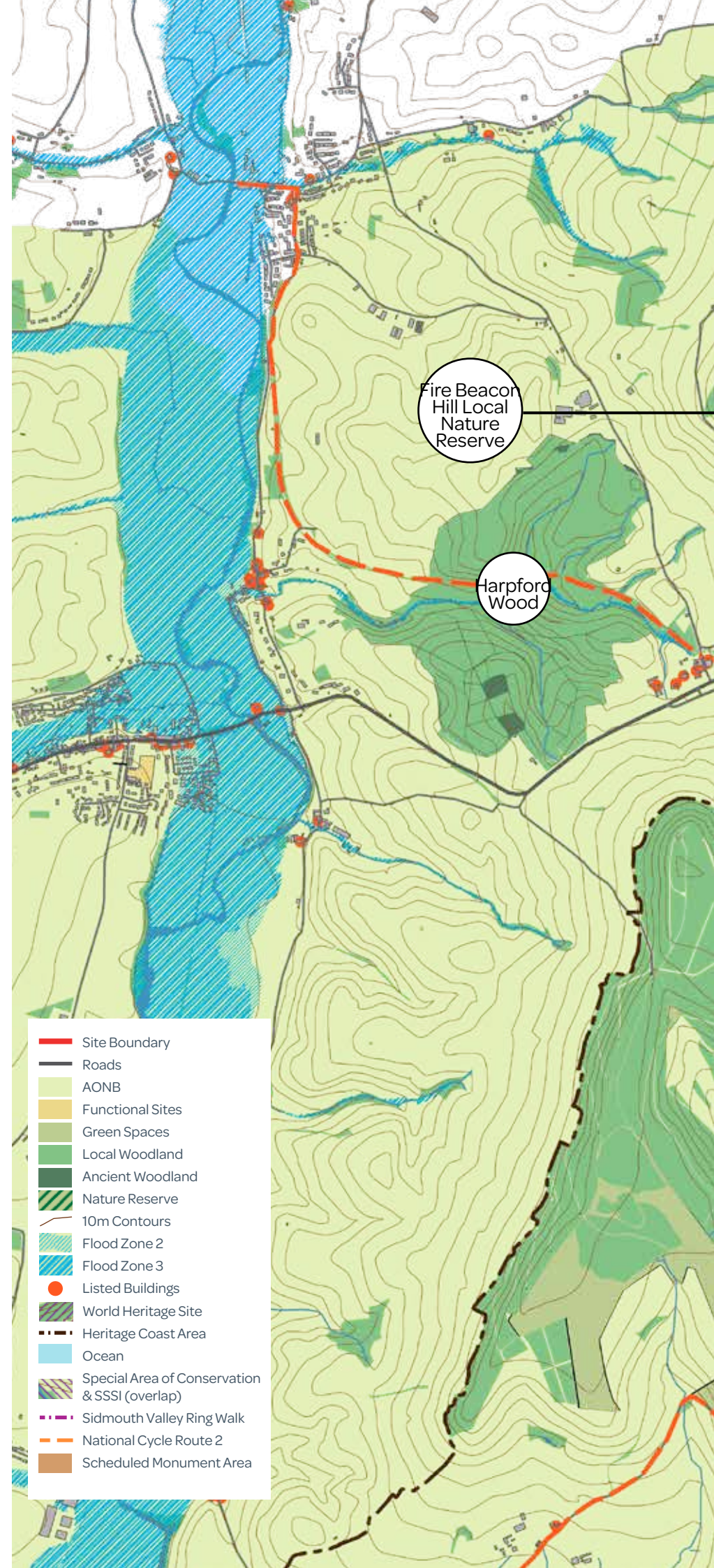
As the Sidmouth development boundary is surrounded by the designated AONB, all potential sites that will significantly contribute to future housing provision around Sidmouth are likely to be located within the AONB. It is therefore important to carefully consider sites that both positively contribute 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

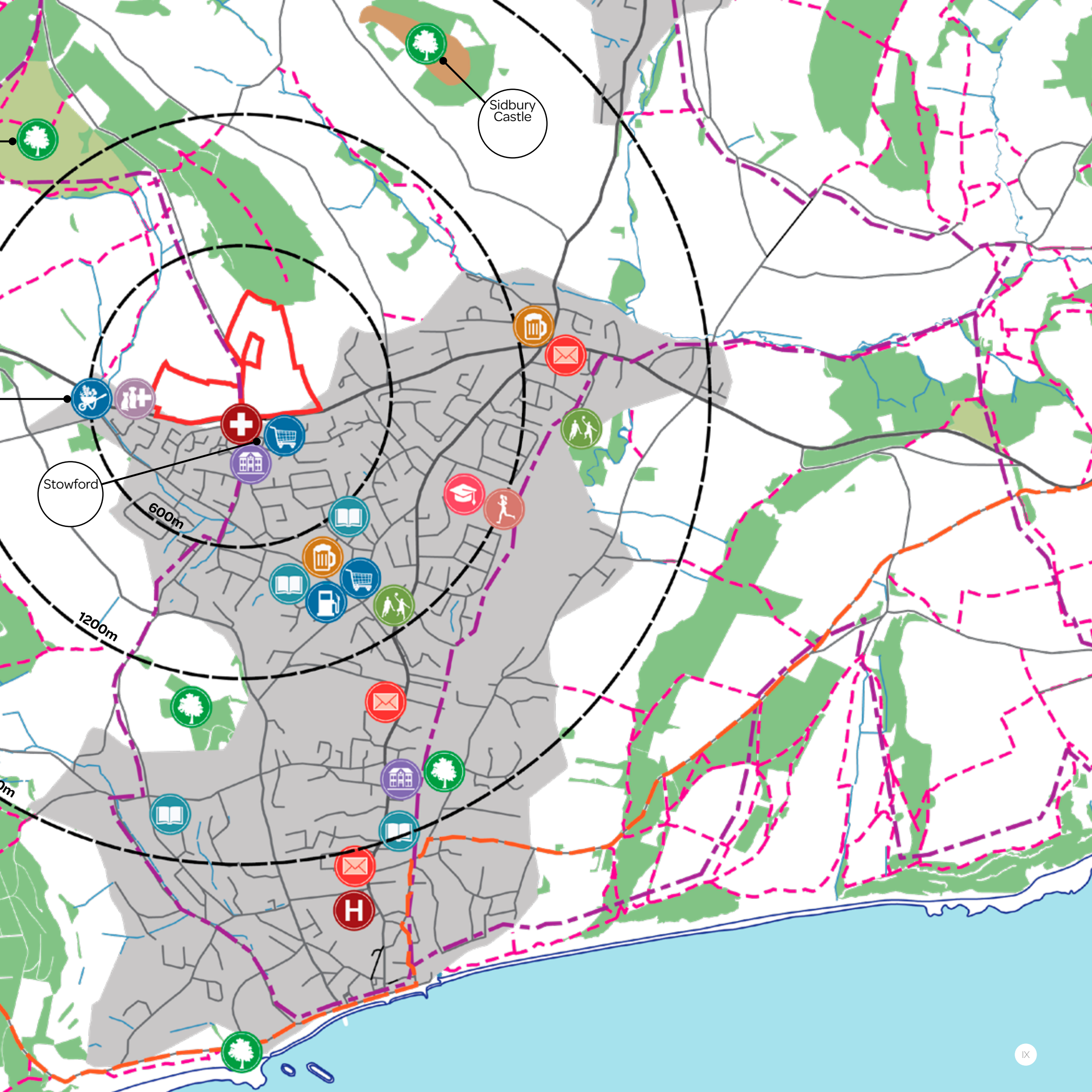
Directly south of the site, on the opposite side of Sidmouth High Street is a range of facilities including a community hall, scout hut, RAF Air Cadets, a local pharmacy, doctor's surgery and Waitrose Supermarket all within walking distance.

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
-  use
-  ian
-  ity Hall/Centre
-  entre
-  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.

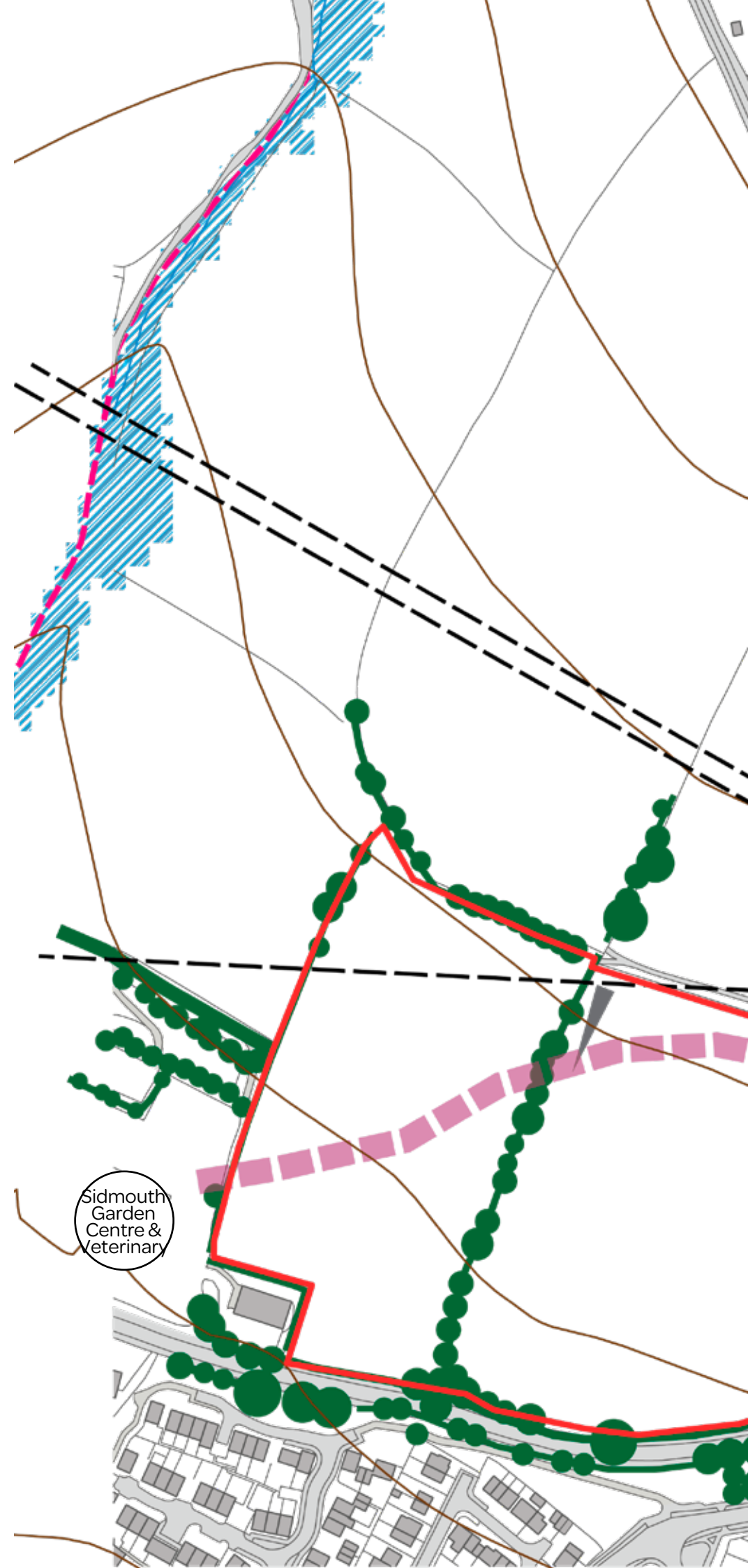
Topography

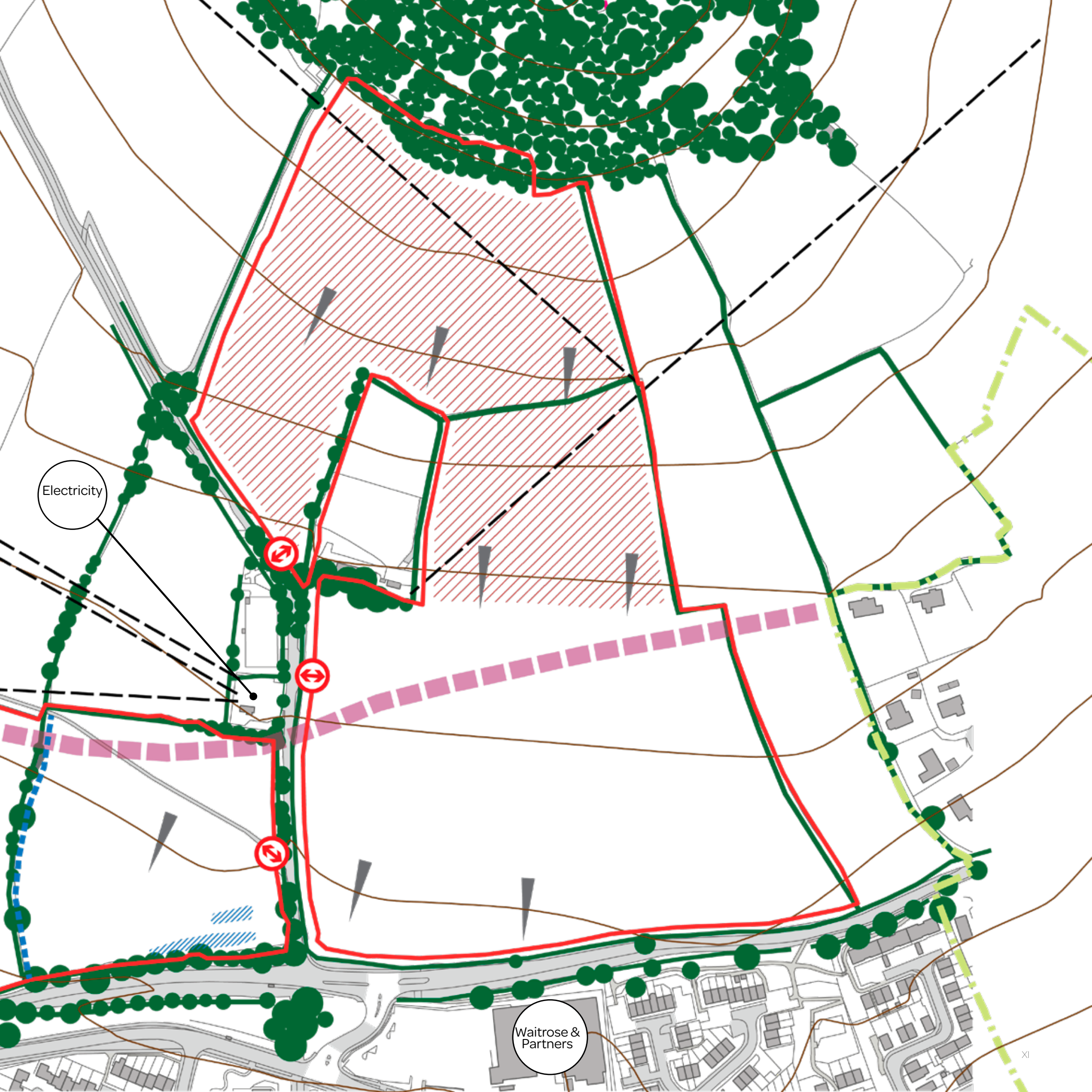
The site rises 85m from circa 70m AOD to 155m over a distance of approximately 485m. This steeply sloping landform will have a significant impact on the layout and composition of the housing.

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

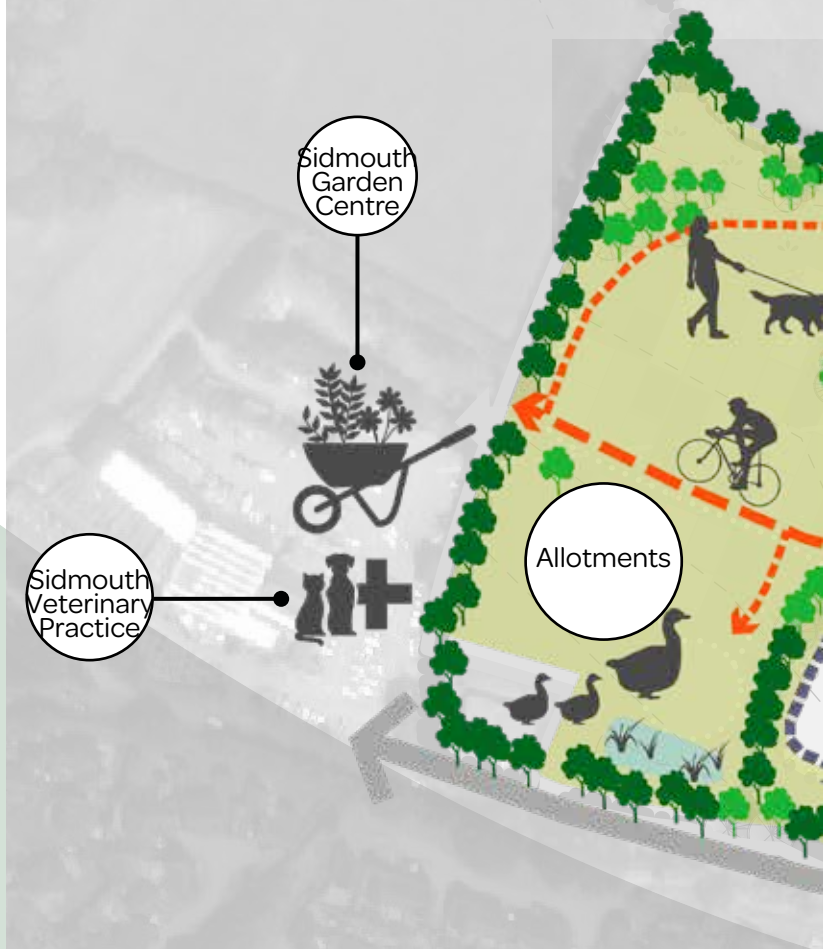
Waitrose & Partners

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.

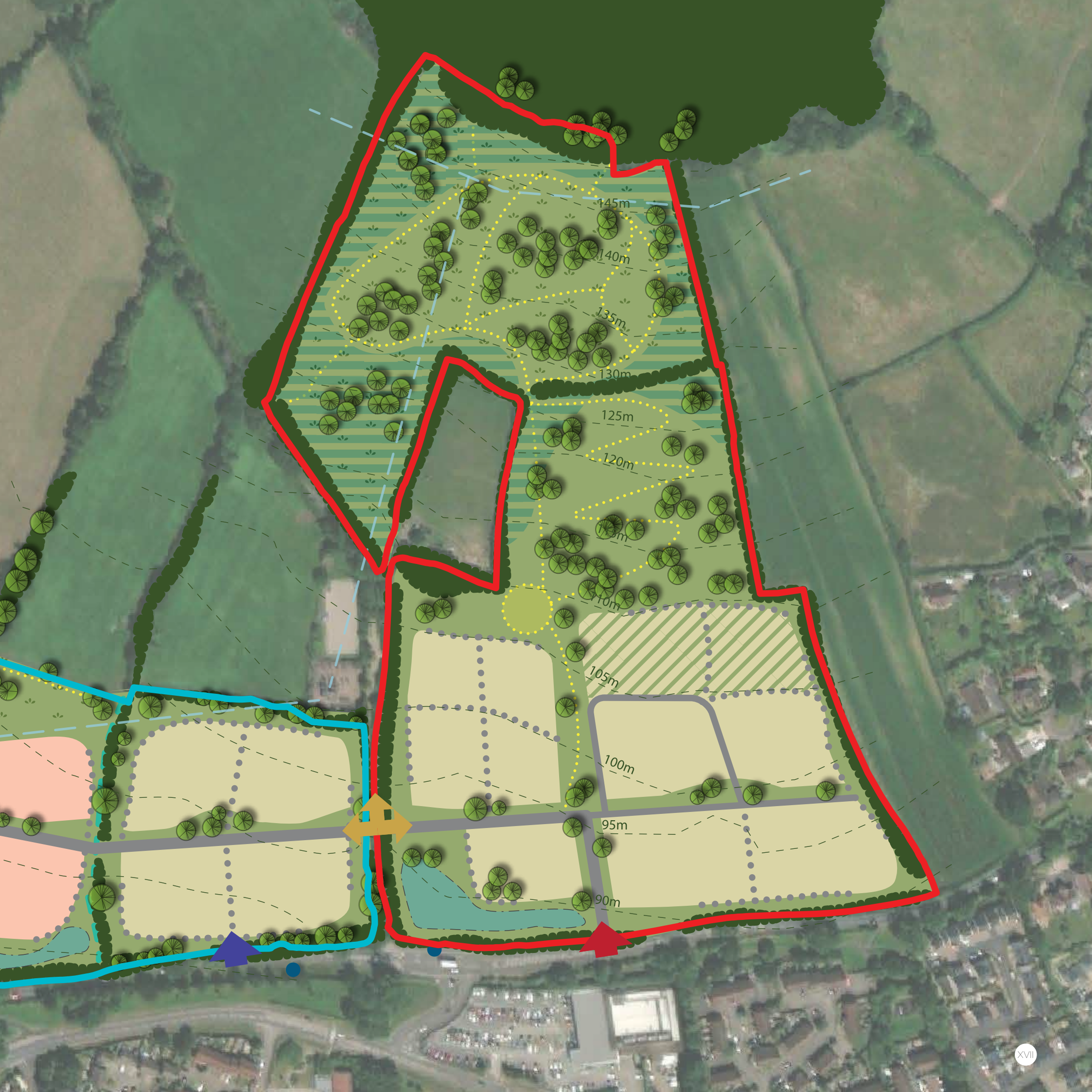


Connections

- 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.

- KEY
-  Parcel A
 -  Parcel B
 -  Main Access
 -  Core Hill Road Acces & 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





For further information contact

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Appendix 2: 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 its 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.

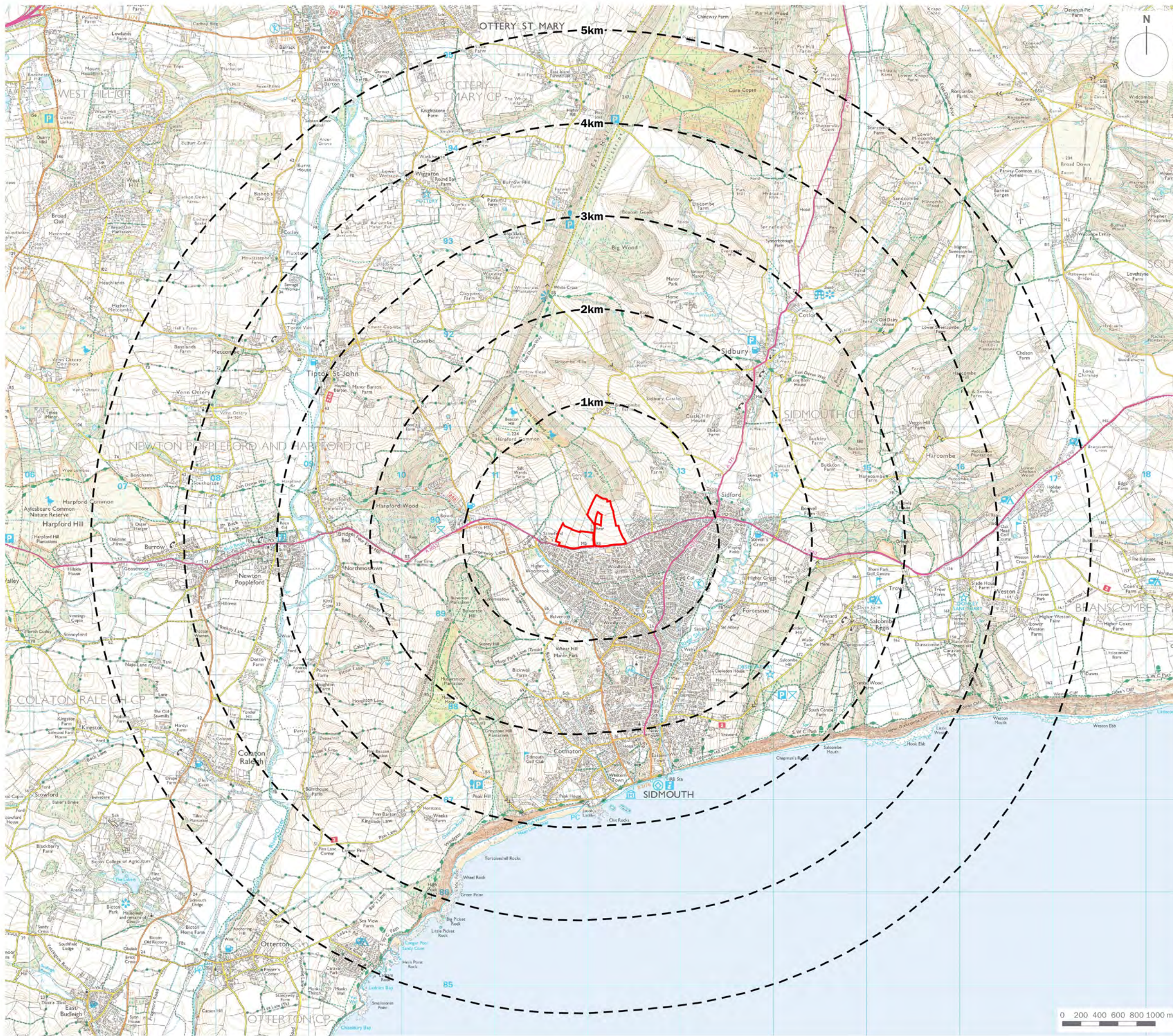
Landscape Conclusions

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

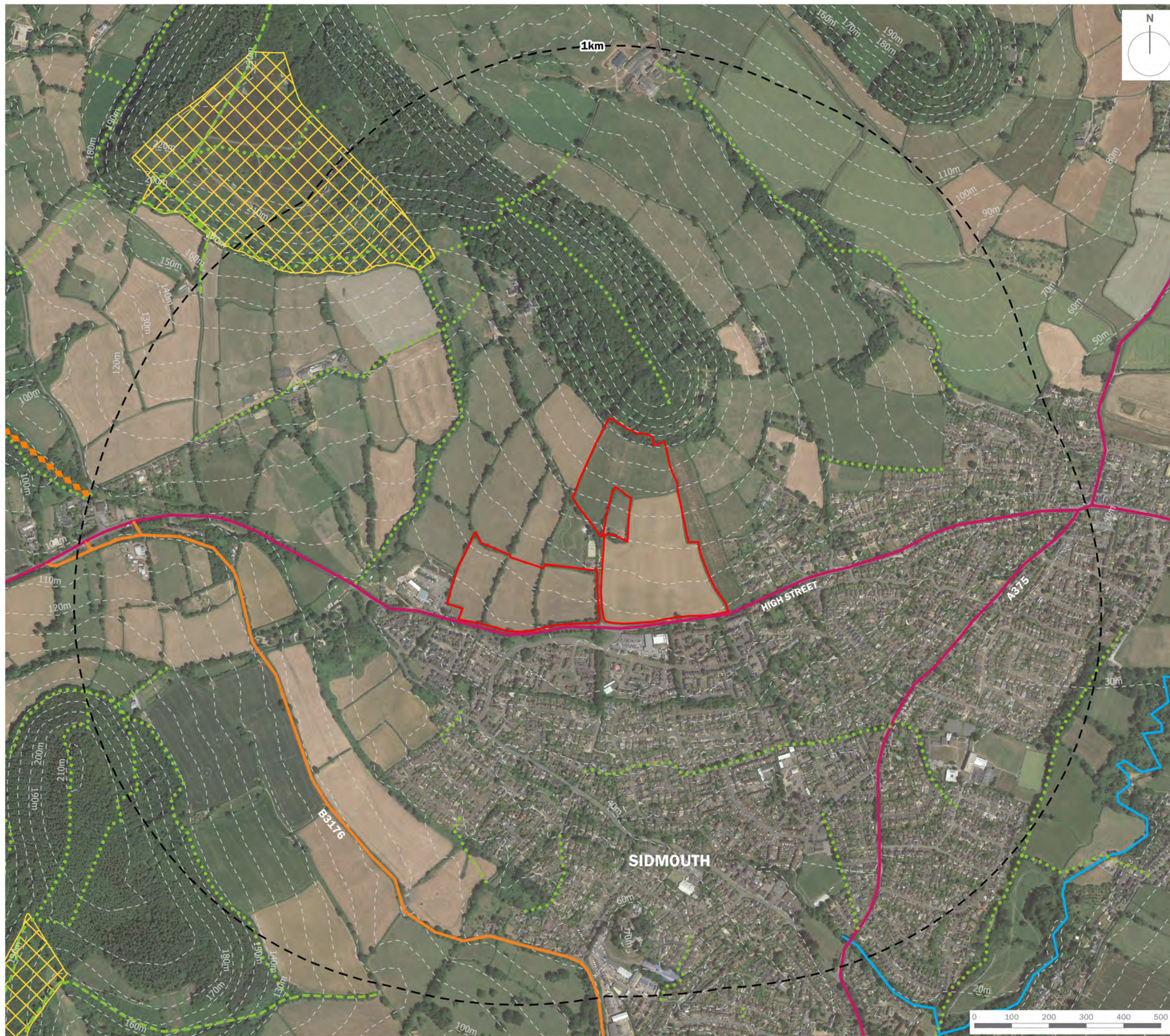
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drawing number **edp7709_d001a** checked **WGa**
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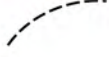
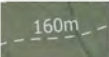









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Plan EDP 2
Site Character and Local Context
(edp7709_d002a 12 January 2023 GYo/WGa)



-  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

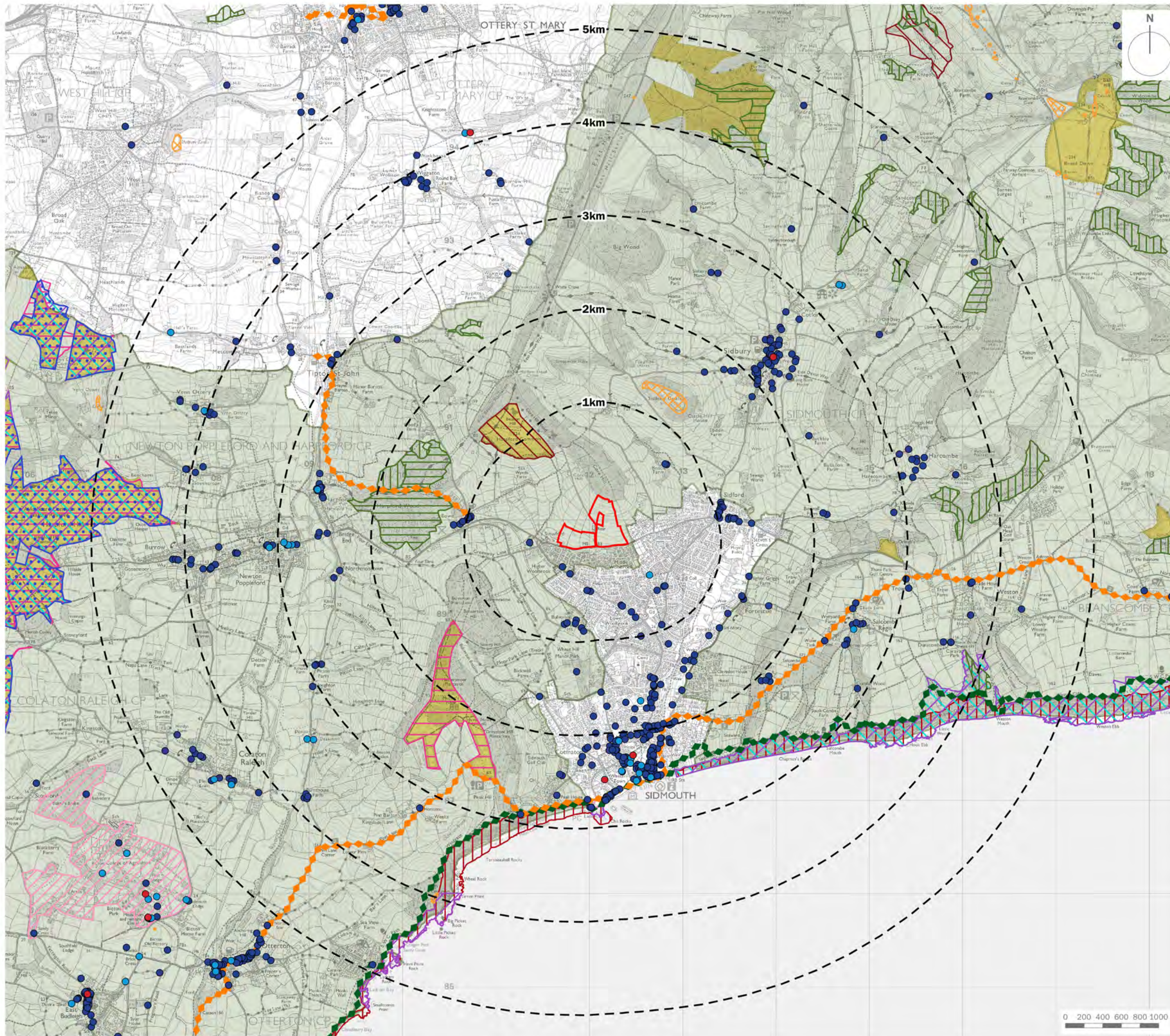
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project title	Land at Sidford High Street, Sidmouth	
drawing title	Site Character and Local Context	
date	12 JANUARY 2023	drawn by GYo
drawing number	edp7709_d002a	checked WGa
scale	1:10,000 @ A3	QA JFr



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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

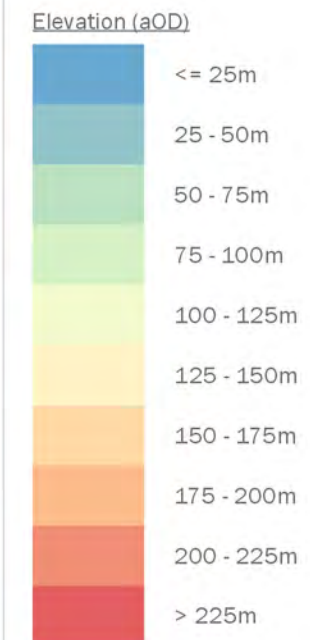
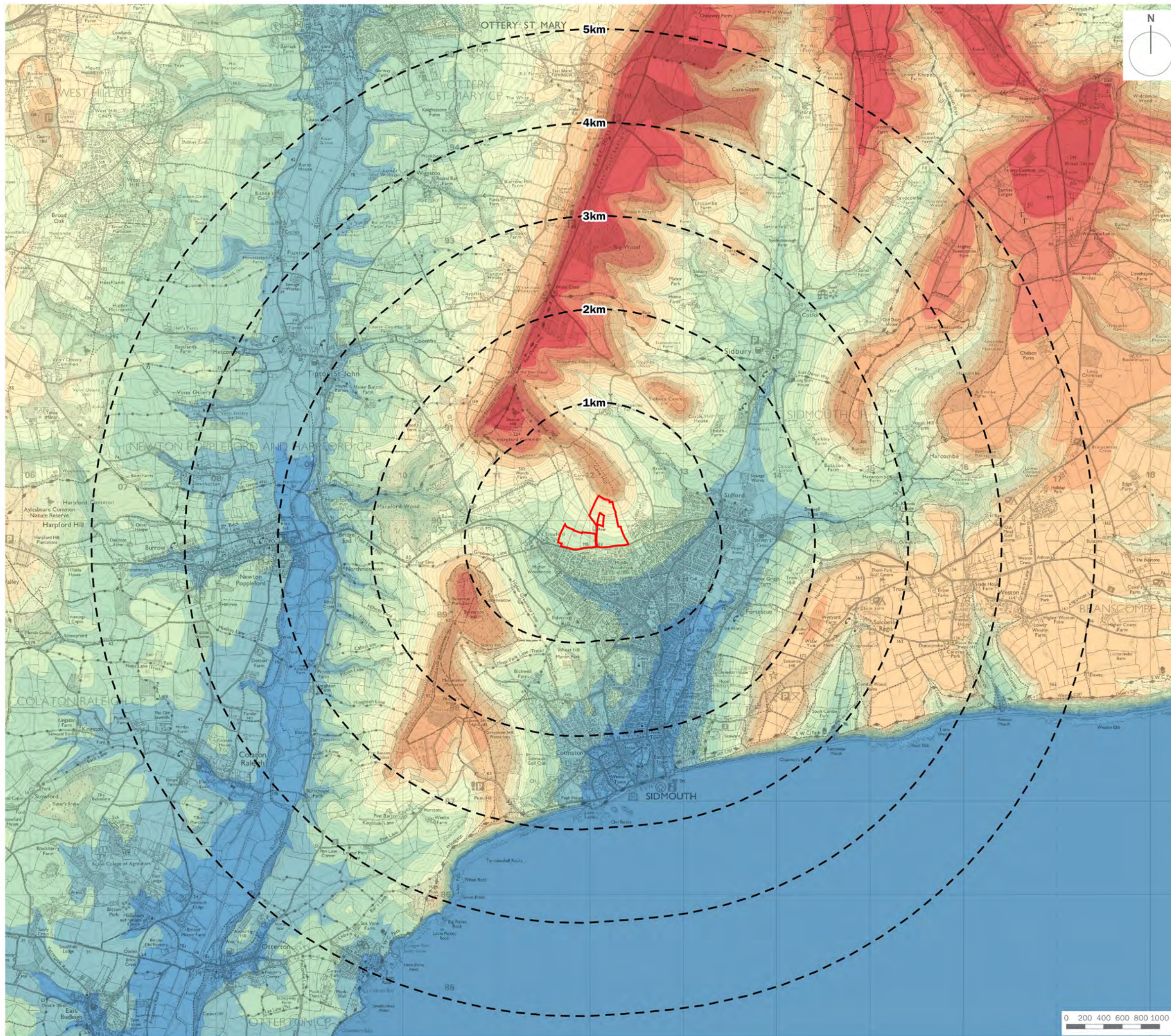
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scale	1:40,000 @ A3	QA	JFr



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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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