

1 February 2019



Planning Policy
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Sent via email – planningpolicy@eastdevon.gov.uk

Dear Sir/Madam

I am writing on behalf of our client Hallam Land Management Ltd (hereafter referred to as “Hallam Land”) in response to the East Devon and Blackdown Hills Landscape Character Assessment and Management Guidelines consultation.

Hallam Land is a wholly owned subsidiary of Henry Boot PLC and has been promoting development land successfully for over 25 years. Hallam Land has delivered a range of strategic projects comprising residential, commercial, retail and mixed use development. Hallam Land has built a strong reputation working with local communities and has a proven track record of delivering quality schemes.

Hallam Land has had an interest in land off Sidmouth Road, Lyme Regis located within the administrative area of East Devon District Council for several years. The location of the site is defined by the red line area shown in the plan attached with this representation. Having reviewed the updated consultation draft Landscape Character Assessment, Hallam Land have a number of concerns and wish to make the following comments.

The importance of Landscape Character Assessment guidance to provide a baseline understanding of the key landscape characteristics and types in East Devon is acknowledged and these documents provide a helpful tool to inform the preparation of development proposals. It is also accepted that guidance contained in the existing 2008 Landscape Character Assessment is now 10 years old and should be updated to take account of more recent policy changes, development of new landscape character types and to reflect upon development that has taken place since 2008 and may have altered existing characteristics of certain landscape types.

Hallam Land support the context for the document to conserve and enhance landscape character and its distinctive qualities whilst accommodating people’s needs and responding to changes and pressures. Hallam Land also agree with section 1.1 that the document should not inhibit innovative planning or design but should aid understanding of how and where positive change could take place without losing distinctive landscape character. Hallam Land is concerned however that the initial positive text that sets the context for the document is lost in later sections with the use of more restrictive and inhibiting terminology.

Land at Sidmouth Road, Lyme Regis is located in the Sidmouth and Lyme Bay Coastal Plateau Landscape Character Area and is defined as Landscape Character Type LCT 1B: Open Coastal Plateau. The area is described as a gently undulating land form comprising the highest land along the coast between Lyme Regis and Exmouth. Much of the land is in arable land use with regular shaped fields enclosed by deep hedges. The document then indicates that the land is often highly visible in views along the coast and forms the setting and views of the Jurassic Coast World Heritage Site.

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Hallam Land is concerned that the Landscape Strategy and Management Plan for this Landscape Character Type inhibits the possibility of innovative planning or design in this area. The Landscape Strategy states that it will *“Retain the Open Coastal Plateaux as a large scale and undeveloped landscape which forms a positive setting and skyline to the coast, World Heritage Site, South West/England Coast Path and several settlements”* and that *“IncurSION of development onto higher land should be avoided.”*

The Landscape Management and Planning Guidelines then develop a very clear intent that the largely undeveloped character will be retained and pressure to allow development on high ground which is currently undeveloped and forms the setting to settlements will be resisted. Use of terminology such as ‘avoid’ and ‘resist’ in a guidance document is considered overly restrictive and does not allow scope for innovative planning or design solutions.

Such restrictive terminology focuses simply on landscape impacts and whilst this focus is to be expected in a landscape character assessment document the terminology used fails to acknowledge that the planning and development process must take into account a range of material considerations. These considerations can often be in conflict, for example, areas immediately adjacent to settlements, even if located on higher land with a detrimental landscape impact, may represent the most sustainable options for future growth to meet the social needs and demand for housing in a town and may provide the best connectivity to services taking account of proximity to a town centre.

The Government has committed to an objective of delivering 300,000 homes a year nationally by the mid-2020’s and reasserted its commitment to this target in its publication ‘Technical consultation on updates to national planning policy and guidance’ in October 2018. Lyme Regis is a town with an acute housing affordability issue with high house prices and relatively low average salaries causing families to be displaced out of the town. This situation is exacerbated by a high proportion of second homes and holiday homes given that Lyme Regis is a key tourist resort in Dorset. The town is also relatively high in the settlement hierarchy in the western part of Dorset and will therefore need to meet strategic housing requirements as well as its own local needs in the future.

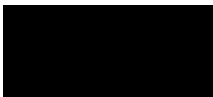
Lyme Regis is washed over by AONB landscape designations and with such constraints it is inevitable that future growth will have a degree of landscape impact wherever it is located. Planning judgement will guide where development is most appropriately located based upon assessment of sites against a range of material considerations, including landscape impact. In making restrictive judgements in landscape character types the document also fails to recognise or acknowledge that the planning process can secure mitigation to minimise impact on the landscape.

Given the challenges that Lyme Regis faces it is considered inappropriate that the Landscape Character Assessment, which is a guidance document, should explicitly seek to resist development in certain locations. It restricts the ability to follow a more objective assessment of identifying the best location for development taking into account other material considerations and the possibility of mitigation to minimise impact.


A nearby example of where significant housing growth in a designated AONB landscape has been accepted is Bridport where some 760 homes have a resolution to grant planning permission following an allocation in West Dorset District Council’s Local Plan. This site was allocated following its selection and identification through the planning process as the most suitable area for growth taking into account a number of considerations, including the impact on the designated landscape.

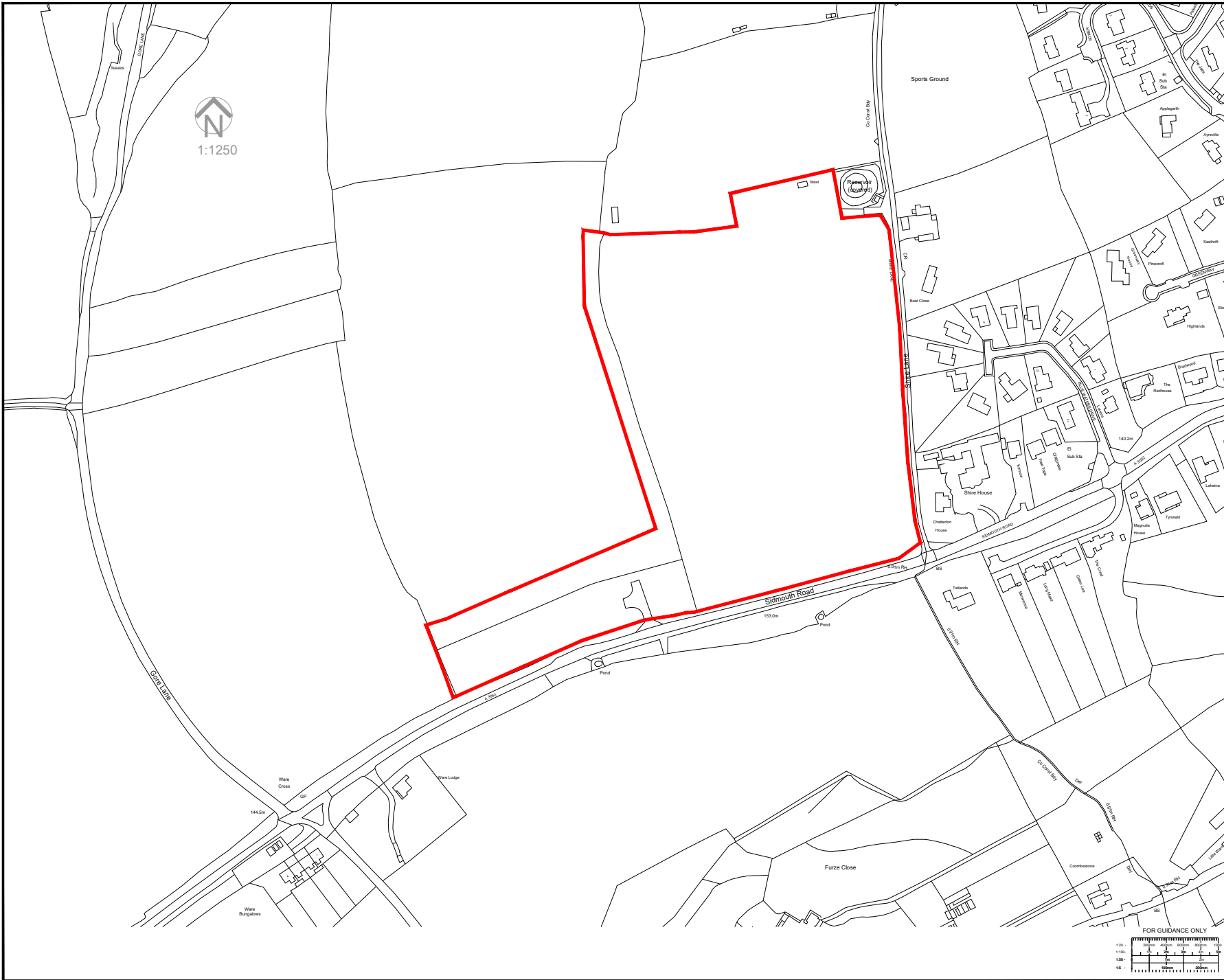
Given that the planning process must take account of a range of material planning considerations and certain areas on higher land may present the most sustainable option for growth, it is considered that the inhibiting terminology in the Landscape Character Assessment is not appropriate for a guidance document and should be replaced. It is considered that more appropriate language should be used such as maintain, conserve and enhance landscape character and minimise impact. This type of language recognises the importance and weight that should be given to important landscapes when considering impact in the planning process but also acknowledges the need to consider this against the potential for mitigation as well as the benefits of development.

In summary, Hallam Land supports the aspirations to update the East Devon and Blackdown Hills Landscape Character Assessment to assist with influencing future development proposals in areas with significant landscape quality and character in East Devon. Hallam Land does not however support the restrictive terminology used in other parts of the document, in particular, the suggestion in the document that its intention is to avoid and resist development pressure in the Open Coastal Plateau Landscape Character Type. Hallam Land considers that the terminology used should be amended as suggested above to enable decision makers to carry out balanced planning judgements taking into account a range of material considerations. This would also reflect the status of the document as guidance.



Steve Clark
Associate





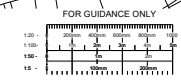
█ Denotes Site boundary

B Planning Submission	16/01/2015 MBW
A Amended boundary line	19/08/2015 MBW
Client	Hallam

PLANNING

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Client: **Hallam Land Management**
 Project: **Land Off Sidmouth Road, Lyme Regis**



Location Plan					
Scale	Date	Drawn By	Checked By	Drawing Number	Revision
1:1250@A1	08.14	CC	MR	2291/01	B

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