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East Devon District Council,
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Date: 06/01/2023

Ref: East Devon District Council Local Plan

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VIA Email

Dear East Devon District Council,

RE: Consultation on the East Devon Local Plan (Regulation 19)

Thank you for the opportunity to comment on the first stage of the Regulation 19 East Devon Local Plan review.

Dorset Council are supportive of the approach being taken by East Devon to manage growth within the East Devon area. The western focus for growth seems to be the most appropriate strategy given the significant constraints and therefore lack of opportunities in the east of the East Devon area. These constraints also reduce opportunities in the western parts of Dorset.

It is understood that East Devon District Council do not have an unmet housing need. The Local Plan has been prepared under the December 2023 version of the NPPF and seeks to make provision for housing to meet the needs of East Devon. The Plan proposes a stepped housing trajectory with a lower rate of provision to 2031 with the rate increasing after this date. It is understood that this stepped rate reflects the time it takes for allocated sites to start to deliver new homes especially given the size of some of the allocations in East Devon.

At this point in time, Dorset Council is examining all options for meeting its housing targets as established through the standard method in national planning practice guidance, published on 12 December 2024. The supply of homes to meet the target will be tested through forthcoming consultation and therefore it is not possible to say if Dorset will have an unmet need at the point of responding to this consultation. Discussions with East Devon will continue as both plans progress towards submission.

Dorset Council feel that there could be greater recognition of the presence of Lyme Regis and the relationship between the town and Uplyme. Recognising those settlements adjacent to East Devon and planning in this context would aid in achieving some of the objectives of the plan. For example, Objective 9 Promoting Sustainable Transport could be realised for development in Uplyme by acknowledging the services and facilities that exist in Lyme Regis and the opportunities for improving access to these facilities by sustainable transport modes. Recognising the existence of Lyme Regis would also demonstrate that the Uplyme / Lyme Regis community that straddles the Dorset / Devon border, is relatively self-contained.

In the context of the Spatial Strategy, the combined population of Lyme Regis and Uplyme is around 5,000 and therefore the settlement is larger than many of the Tier 3 Local Centres and closer in size to those in Tier 2. As such, it may be appropriate to consider opportunities for meeting housing need in this location. However, Dorset Council do acknowledge the highly constrained nature of the area that severely limits opportunities for development.

Recognition of the role of Uplyme within the settlement hierarchy reflecting the local facilities that exist, is supported. The village could therefore be considered as an appropriate location to meet local needs

especially when considered alongside Lyme Regis. The local needs of the wider area, including Lyme Regis should be considered in this context and the wording of Policy HN10 Exception Sites, that need can arise from neighbouring parishes as well as from the host parish, is supported.

It is however important that through the application of Policy SE06 that Lyme Regis town centre is recognised. The role and function of Uplyme is very different when considered alongside Lyme Regis. This is particularly relevant when applying the sequential approach to retail development and when undertaking any retail impact assessments in reasonable proximity to Lyme Regis. Similarly, through the application of Policy TR01, contributions towards public transport provision should consider the opportunities to connect to Lyme Regis

We welcome further opportunities to continue the dialogue as our local plans progress towards examination.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Michael Garrity', written in a cursive style.

Michael Garrity
Corporate Director - Planning