
East Devon Local Plan Preferred Options Consultation

Land at Sidmouth Road, Lyme Regis

Representation prepared by Savills on behalf of
Hallam Land Management Ltd.

January 2023

Contents

1.	Introduction	1
2.	Site Context	2
3.	Meeting the housing need	4
4.	Planning for Lyme Regis	4
5.	Duty to Cooperate	6
6.	Conclusions	7

1. Introduction

- 1.1. Savills are instructed on behalf of our client Hallam Land Management Ltd (hereafter referred to as “Hallam Land”), to respond to the East Devon Local Plan Consultation. This representation specifically relates to Hallam Land’s interests at Sidmouth Road, Lyme Regis.
- 1.2. Hallam Land is a wholly owned subsidiary of Henry Boot PLC and has been promoting development land successfully for over 30 years. Hallam Land has delivered a range of strategic projects comprising residential, commercial, retail and mixed use development. The portfolio ranges from small town/village extensions to new communities. Recent projects include Cranbrook, near Exeter (currently 3,500 dwellings), Bridport, West Dorset (760 dwellings), Melksham, Wiltshire (225 dwellings) and Yatton, Somerset (170 dwellings). Hallam Land has built a strong reputation working with local communities and has a proven track record of delivering quality schemes.
- 1.3. Hallam Land has been involved with the promotion of this site for a number of years now and has made previous representations to the East Devon Local Plan process as well as the West Dorset, Weymouth & Portland Local Plan Review. The site was also submitted to East Devon Council’s 2017 call for sites process.
- 1.4. Previous representations have consistently raised concerns that the housing needs of Lyme Regis are not being adequately considered or met as a result of inappropriate levels of housing allocations for the town and that the duty to co-operate across the administrative boundary is not being satisfactorily addressed. These latest representations to the East Devon Local Plan consultation maintain a consistent concern to the approach being taken to planning for the housing needs of Lyme Regis.

2. Site Context

- 2.1. The site is located on the western edge of the coastal town of Lyme Regis. It is on the Dorset and Devon border approximately 28 miles east of Exeter and 25 miles west of Dorchester. A site location plan is provided at **Figure 1**. The site comprises one large agricultural field measuring approximately 5.3 hectares (13 acres) and is bordered to the east by Shire Lane, to the south by the A3052 (Sidmouth Road) and to the west by existing agricultural fields. The site benefits from direct access onto the A3052.
- 2.2. The site is free from physical and environmental constraints other than being within the Area of Outstanding Natural Beauty (AONB), which covers a very broad area of Dorset and Devon extending from Exmouth to Swanage. It covers approximately 69% of West Dorset, Weymouth and Portland, washes over Lyme Regis and as a result any development at Lyme Regis will be within the AONB.
- 2.3. The built up edge of Lyme Regis adjoins the eastern edge of the site, with open countryside to the west of the site.
- 2.4. The site is located on a gently sloping plateau and is defined by mature, well established hedgerows along its boundaries. Nearby areas of woodland and adjoining development to the east result in the site being well screened by topography and vegetation from local views within the town of Lyme Regis and the outlying settlements of Uplyme and Ware. The retention of existing vegetation, supplemented by additional strategic planting and careful design would minimise impacts on the wider landscape and provide a well contained and clearly defined extension to Lyme Regis.
- 2.5. Hallam Land continue to present this site as available for development and our initial appraisal work indicates that the site could provide approximately 120 new homes, with 50% of these being affordable, built in one development phase delivered over an 18 month to 2 year period, within the next five years. The site is therefore both deliverable and achievable.

Figure 1 – Site Location Plan



3. Meeting the housing need

- 3.1. The East Devon Local Plan consultation indicates that the housing requirement when applying the Government's standard housing methodology would result in a need for 946 new homes per annum or 18,920 new homes over the plan period. The Council's own recent housing need analysis however demonstrates a significant affordable housing issue as a result of increased house prices and a decline in the provision of new affordable housing stock in recent years. The evidence base provides a robust and strong justification to plan for higher levels of housing growth across the plan area if the increasing affordability concerns are to be addressed.

4. Planning for Lyme Regis

- 4.1. Lyme Regis is located at the most western coastal extent of the administrative area of Dorset Council. It straddles the administrative boundary between Dorset Council and East Devon District Council and therefore presents cross boundary issues.
- 4.2. Lyme Regis faces a number of issues which include a low wage economy, an ageing population; a lack of affordable housing; and a high level of second home ownership. The draft Dorset Local Plan states that *"Tourism is a major source of employment in the town, but has also resulted in high house prices and more than 20% of the housing stock becoming second or holiday homes. As a result the lack of affordable housing is an issue in the town"*
- 4.3. To address these issues it is of vital importance to increase the supply of housing to the area to provide more affordable housing and greater stock to the market with a range of affordable home ownership products to enable younger families to make the step onto the property market rather than being forced out of the town.
- 4.4. Dorset Council's current draft Local Plan concludes that *"Development opportunities in and around Lyme Regis are very limited due to land instability and both highway and landscape constraints. The development of an extant permission on land south of Colway Lane will provide a further 45 houses, but otherwise sites on the edge of the town, further from town centre services and facilities, have had to be considered, with the only development opportunity identified being 40 units as an extension to Woodberry Down."*

East Devon Local Plan Preferred Options Consultation

Land at Sidmouth Road, Lyme Regis



- 4.5. We disagree to the assertion that the Woodberry Down Extension is the only identifiable development opportunity. We consider that land at Sidmouth Road, Lyme Regis is also a sustainable and viable development opportunity to increase the housing provision to meet the acute need for housing in the town. Dorset Council and East Devon District Council can, through the duty to cooperate, seek to work collaboratively to make an appropriate allocation on this site to meet the needs of the town. The current emerging allocation of 40 units in the draft Dorset Local Plan is considered woefully inadequate.
- 4.6. Lyme Regis has a good range of services and facilities, including two primary schools and a secondary school, GP surgery, town hall, shops, pubs, restaurants and tourist attractions. The town has always been considered as a sustainable settlement capable of accommodating new residential development but has seen limited historic growth in recent years given the surrounding constraints to the town including topography, flood risk and landscape designations.
- 4.7. The town of Lyme Regis is however, one of Dorset's principal tourist resorts, is well related to East Devon and an important centre for visitors to the World Heritage Coast. A consequence of this is that the town has a high proportion of second homes and holiday homes. When considered in conjunction with an ageing population in the town and the limited residential growth of the past, the resultant effect is the displacement of young families out of the town to seek affordable and available family housing elsewhere.
- 4.8. Average house prices in Lyme Regis exceed £400,000 with prices up 3% over the last year reaching similar average prices of the peak of £410,000 in 2018 (Source: Rightmove and Zoopla), significantly higher than national averages. As the town is an attractive tourist destination, much of its employment is in the accommodation and food industries, which are often associated with lower salaries. With average salaries in Dorset at around £22,000 (Source: payscale.com), the average cost of housing in Lyme Regis is now more than 18 times average salaries. The high house prices and low salaries presents a real and current issue for young people and families who live and work in Lyme Regis, creating an acute affordability issue.
- 4.9. We consider that the current proposed allocation of 40 homes in Lyme Regis would be entirely inadequate to address these issues and plan for the needs of Lyme Regis for the plan period. The proposed allocation represents a plan of less than 2 dwellings per annum over the draft Dorset Local Plan period for a town experiencing significant social and demographic issues, exacerbated by the impact of second homes.
- 4.10. We therefore objected to inadequate levels of proposed growth in Lyme Regis through the Dorset Local Plan Consultation process. Furthermore, we consider that suitable, sustainable housing sites, such as land at Sidmouth Road should be seriously considered to make available the essential housing required to support local people, local employers, the local economy and local services in Lyme Regis. The East Devon Local Plan should allocate land at Sidmouth Road to meet the cross boundary needs of neighbouring Dorset Council.

5. Duty to Cooperate

- 5.1. Section 110 of the Localism Act 2011 sets out a 'duty to co-operate', requiring that Councils and public bodies engage constructively, actively and on an ongoing basis to develop strategic policies, and consider joint approaches to plan making in order to ensure the planning of sustainable development. It is also one of the tests of soundness against which local plans are assessed and whilst its future is under consideration by the Government it remains a relevant test at the time of this consultation.
- 5.2. The issue of the duty to co-operate in the area of Lyme Regis has been a long running debate as previously set out in our representations to the plan making process of the former West Dorset, Weymouth & Portland Council. Both the West Dorset, Weymouth & Portland Local Plan process and the East Devon Local Plan process were subject to scrutiny in this area with both Local Plan Inspector's raising concerns regarding soundness and the requirement for further work to be undertaken to assess housing needs in the area. The East Devon Local Plan Inspector commented that *"Engagement has not led to complete agreement with regard to how any un-met need in Lyme Regis would be addressed but there is a willingness to work together."*
- 5.3. The East Devon Local Plan Inspector also recommended modifications to ensure that collaboration in the future occurs. The modifications recognised that at Lyme Regis there is a local expression of need for housing and employment, although this is not quantified through formal local housing and employment needs assessment in this area. A commitment is then made that *"East Devon District Council will work with West Dorset District Council, Uplyme Parish Council and Lyme Regis Town Council to ensure over the long term that the most appropriate solutions to meeting the local needs of both communities are fully understood and explored and thereafter expressed in future policy documents."*
- 5.4. The East Devon Local Plan Issues and Options consultation report set out at paragraphs 2.7 and 2.8 the Council's intention to work with its neighbours through the duty to cooperate. However, there appears to be no evidence of said cooperation taking place, and no mention of cooperation across boundaries within the current East Devon Local Plan consultation draft. We are unable therefore to determine the extent of assessment or collaborative discussions that have taken place between the Councils to address the needs of Lyme Regis.
- 5.5. If a site in East Devon was objectively assessed as the most sustainable location for housing growth, we consider that East Devon have it entirely within their power to allocate a site for housing in their Local Plan that could meet the housing needs of Lyme Regis in Dorset. The lack of commentary in the Local Plan consultation document does not provide clarity as to whether such discussions have been had and we are therefore concerned that the duty to co-operate has not yet been met.

- 5.6. An example of the duty to co-operate working successfully can be seen in the adopted Cheltenham, Gloucester and Tewkesbury Joint Core Strategy. In making provision for an adequate supply of housing in Tewkesbury Borough Council, the Joint Core Strategy identified a provision of 500 houses in Mitton, a site located in the neighbouring authority area of Wychavon District Council. This was not a formal allocation but shown as a location that would deliver the housing requirements of Tewkesbury beyond its administrative boundary.
- 5.7. In this example, Wychavon District Council, without needing to review its own Local Plan, agreed to contribute 500 dwellings to Tewkesbury's supply and the Local Plan Inspector accepted a Planning Statement signed by both Tewkesbury Borough Council and Wychavon District Council setting out an agreement for delivery of this cross-boundary site.
- 5.8. This example clearly demonstrates how cross boundary sites can be brought forward for development and we are concerned from the lack of available information as to whether Dorset Council and East Devon Council are working together effectively to support the long term growth needs of Lyme Regis. This needs to be addressed urgently, and the Local Plan should not proceed further without it considering how the needs of Lyme Regis can be sustainably met.

6. Conclusions

- 6.1. In summary, we support the approach to the Local Plan period and the objectives proposed subject to an expansion on meeting objectively assessed housing needs of the Local Plan area. We also consider that the Council should be planning for the evidence based higher housing requirements in the Local Plan area to address the issue of affordability.
- 6.2. Hallam Land present the Sidmouth Road site as available and developable to make an important contribution towards meeting the future growth needs of Lyme Regis to include much needed, and currently under-provided, affordable housing. The site represents a sustainable and deliverable opportunity for high quality development and should be identified for development.
- 6.3. Contrary to the requirements under the 'duty to co-operate', we have not seen any evidence that Dorset Council and East Devon Council have undertaken sufficient evidence gathering or collaborative working to bring forward suitable proposals to meet the long term needs of Lyme Regis, with the current lack of identified options and indicative capacity leaving a large hole in meeting the housing needs of the town.

East Devon Local Plan Preferred Options Consultation

Land at Sidmouth Road, Lyme Regis



- 6.4. The issue of future growth and meeting housing need in Lyme Regis is a strategic, cross boundary issue and one that we do not believe has been dealt with adequately in previous Local Plans and does not appear to have been addressed adequately in the emerging draft Dorset Local Plan. The matter requires constructive and active engagement between the two Local Planning Authorities to provide a sound planning policy framework that addresses and responds to these needs. To fail to provide adequate opportunity for housing growth in Lyme Regis will be to the detriment of the sustainability of the town, its local economy, tourist industry and the community that it supports.