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Date: 06/01/2026

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 (Second Regulation 19)

Thank you for the opportunity to comment on the East Devon Local Plan Second Regulation 19 Publication Draft (November 2025) and supporting Statements of Common Ground (**CD01a, b, c & d**).

We understand that, in accordance with Annex 1 of the December 2024 National Planning Policy Framework (NPPF), the East Devon Local Plan is progressing under the December 2023 NPPF, having reached Regulation 19 stage in February 2025. Under these transitional arrangements, the plan is required to provide for at least 80% of the standard method local housing need. Based on a standard method figure of 1,146 dwellings per annum, this equates to a minimum requirement of 950.4 dwellings per annum. Over the 22-year plan period, this results in a minimum housing provision of 20,908 net additional dwellings. This position is outlined in **Strategic Matter H01** and can generally be supported.

The justification to **Strategic Policy SP02** notes there is a modest surplus in the projected supply which is described in the emerging plan as a 'healthy headroom surplus of 12.18% that will account for any possible non-delivery'. To deliver the homes **Appendix 1** sets out a stepped housing trajectory increasing from 850 homes per year in the early part of the plan period (2020/21 to 2031/32) to 1,070 homes per year in the later part of the plan (2032/33 to 2041/42). 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.

Work on the Dorset Council Local Plan began in 2019, with options consultations in 2021 and August 2025. Dorset Council intends to publish a Regulation 19 plan in August 2026 and submit it for examination in December 2026 under the current plan-making system. In its response to the first East Devon Regulation 19 consultation, Dorset Council stated that it could not confirm whether Dorset would have an unmet housing need. This remains our position until further work is completed on the analysis of the August 2025 consultation responses and further evidence gathering. We therefore welcome the additional text within **Strategic Matter H02** added to paragraph 3.8 of the plan confirming that the plan will be reviewed in accordance with national policy should housing delivery or identified needs, including unmet needs from adjacent authorities, change in the future.

The East Devon–Dorset boundary is predominantly rural and largely within National Landscape designations. Lyme Regis lies at the county boundary and forms a contiguous urban area with Uplyme. Together the two settlements have a combined population of around 5,000, which is greater than many Tier 3 Local Centres. In the Regulation 19 plan, Uplyme is identified as a Tier 4 service village, with a settlement boundary enlarged from the existing boundary to allow limited additional growth. Dorset Council has acknowledged within **Strategic Matter H02** that development opportunities within Dorset are constrained but continue to request that Uplyme be considered as a local centre to help meet needs arising in the immediate area, including Lyme Regis, particularly for affordable housing.

In relation to Gypsy and Traveller provision, **Strategic Matter H03** describes a joint approach to pitch provision with Exeter, Mid Devon and Teignbridge. Paragraph 6.5 seeks agreement that there are no cross-boundary issues in respect of Gypsy and Traveller and Travelling Showpeople provision, a position with which Dorset Council agrees

With regard to employment, **Strategic Matter E01** explains the Plan's approach to meeting East Devon's employment needs, and paragraph 7.13 confirms that East Devon is providing for its own employment requirement; this position is also agreed by Dorset Council.

Strategic Matter C01 addresses climate change, noting that East Devon District Council, Devon County Council and neighbouring authorities, including Dorset Council, have all declared a climate emergency and adopted strategies to respond to this issue. Paragraph 4.7 records that there are no areas of disagreement. Dorset Council agrees with this position and is keen to continue working collaboratively with East Devon to mitigate climate change impacts.

Dorset Council supports the approach in **Strategic Policy PB04** requiring development within the River Axe SAC catchment to demonstrate nutrient neutrality using the Natural England nutrient calculator. This is consistent with Dorset Council's approach. However, the Plan does not reference East Devon District Council's £4.09m Local Nutrient Mitigation Fund (LNMF) award or articulate how delivery of mitigation through this funding will support housing delivery. Dorset Council wish to suggest that the supporting text includes more positive references to joint working and investment of LNMF funding to secure mitigation and enable development within the River Axe catchment.

Strategic Matter W01 appropriately records shared concerns regarding water quality in the River Axe SAC but is framed largely in negative terms. Dorset Council wish to suggest amendments to include more positive references to proactive joint working and delivery of mitigation, particularly reflecting the investment of LNMF funding, to support housing supply and delivery within the River Axe catchment.

Part A of **Strategic Policy AR02** appears restrictive where impacts on water quality arise from constrained wastewater and water supply infrastructure that is outside developer control. While this is noted, Dorset Council does not consider it necessary to comment formally on this policy.

The Statement of Common Ground on Transport **CSD-010d** describes the Strategic Road Network in East Devon, identifying the M5, A30, A303 and A35, with the latter providing the main connection towards Dorset. Dorset is not referenced further in the Plan's transport section. However, Dorset Council's Transport Planning Team has previously indicated its support for continued joint working with East Devon, particularly in relation to improving cross-boundary bus services, including links between Bridport and Axminster railway station. Dorset Council has also welcomed collaboration to ensure that routes identified in East Devon's Local Cycling and Walking Infrastructure Plan (LCWIP) that cross into Dorset are aligned with those identified in Dorset's Active Travel Infrastructure Plan (ATIP).

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

Yours sincerely,



Michael Garrity - Corporate Director – Planning