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Response to the submission of the Uplyme Neighbourhood Plan

Having considered the plan in detail, please find herewith East Devon District Council’s response to the submission consultation of the Uplyme Neighbourhood Plan. We wish also to congratulate and commend the hard work and dedication of the plan producers on reaching this stage of the process.

EDDC Cmmt No	Issue / Policy In Plan	Comment
1.	General	It should be noted that recent examinations in Stockland and Bishops Clyst in East Devon have advised the removal of references to national and district policies in the parenthesis from the planning policy boxes, labelling them subjective and resulting in attracting attention away from the policies themselves.
2.	Policy UHG3	Policy UHG3 supports the provision of affordable housing exception schemes within the Neighbourhood Plan but does not definitively state the criteria which applicants would be expected to meet to qualify. Strategy 35 of the Local Plan defines mixed-market affordable exceptions housing and it is assumed that this policy is the policy alluded to in brackets, however, this is not explicitly stated and the supporting text seems to contradict this by stating that ‘exception sites (outside the boundary) could also include self build schemes...’. Self Build housing is not currently considered as being allowable as exceptions housing so it would appear to contradict the Local Plan in this respect. The result is that rather than offering clarity, the policy does not provide the decision maker a clear indication how to react to a development proposal.
3.	Policy UHG4	Following the recent publication of the East Budleigh with Bicton Neighbourhood Plan Examiners Report the Examiner recommended removal of the policy that allocated a rural exception site on the basis

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Chief Executive: Mark R Williams Deputy Chief Executive: Richard Cohen



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		<p>that a rural exception site is one that does not comply with, and is an exception to, policy and the allocation of one would cause confusion for a decision maker. We would therefore advise an amendment to the policy to remove references to the allocations being exceptions and instead consider their allocation as affordable housing sites.</p> <p>In respect of the proposed allocations within Policy UHG4, the most appropriate Local Plan policies for the Neighbourhood Plan Examiner to consider are Strategy 35 and Strategy 46.</p>
4.	Policy UHG5	To provide further clarity it is proposed that the term 'in rural areas' should be amended to read 'outside of the built-up area boundary'.
5.	Policy UEM1	We wish to draw attention to the relevant policy in the Local Plan- Policy E5- which is supportive of small scale economic development in rural areas but includes a criteria relating to any proposal being well related in sustainability terms to the village, which ensures that development will not come in locations away from the existing village in the interests of sustainable development.
6.	Policy UEM2	As above, we wish to draw attention to the relevant policy in the Local Plan- Policy E5- which is supportive of small scale economic development in rural areas but includes a criteria relating to any proposal being well related in sustainability terms to the village, which ensures that development will not come in locations away from the existing village in the interests of sustainable development. To make it clearly distinct from UEM1 the word 'existing' in the first line of the policy to read '...development of <u>existing</u> local businesses...'
7.	Policy UEM4	We wish to draw attention to the relevant policy in the Local Plan, policy E16- which promotes tourist accommodation where the proposal is within the built-up area boundary and is accessible on foot, by bicycle and public transport, which ensures that development will not come in locations away from the existing village in the interests of sustainable development.
8.	Policy UCF3	As written the policy would support social and recreation facilities being provided in locations that may not be accessible by local residents. The term 'especially supported' adds confusion for the decision maker- either a proposal is supported or it isn't. We would recommend removal of the final sentence and it be replaced with the following text 'Any proposal should be well related to the village and be accessible by public transport, bicycle and on foot'.
9.	Policy UEN5	The term 'housing or development schemes' is slightly confusing as technically all proposals would fall under the heading of a 'development scheme'. The policy should be amended to read the following 'new housing or business development will need to' as it would be inappropriate to expect all development proposals e.g. new dormer windows to require additional planting of trees and hedges. It

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		might also be advisable to include the term 'where appropriate' at the end of the policy as additional trees and hedgerows might not always enhance the landscape character in all cases.
10.	Policy UEN7	Local Green Space is defined in the NPPF as having protection consistent with Green Belt land with further clarity provided in planning practice guidance. Although this designation offers significant protection there may be some instances where development of temporary or permanent structures may be desirable e.g. a new cricket pavilion or new permanent bench. The policy, as worded, would prevent such development and therefore we recommend including a small amendment for the policy to read '... proposals for permanent built development within this Green Space area will be resisted <u>except in special circumstances where a community benefit will result</u> and the area protected...'

Yours sincerely,

Tim Spurway
Neighbourhood Planning Officer