

Mr Timothy Spurway  
East Devon District Council  
The Knowle  
Sidmouth  
Devon  
EX10 8HL

**Our ref:** DC/2006/000243/AP-  
06/PO3-L01  
**Your ref:**  
**Date:** 08 February 2017

Dear Mr Spurway

### **Uplyme Neighbourhood Development Plan – Submission Consultation**

Thank you for your consultation of 28 November 2016 in respect of the above neighbourhood plan. We apologise for our delay in responding.

We support the vision, objectives and policies set out in the submission version of the Uplyme neighbourhood plan, in particular those relating to the natural environment, wildlife, flood risk and rivers. We are pleased to see that the plan has incorporated the advice we have provided previously to the neighbourhood plan steering group. For information, a copy of our most recent letter responding to a consultation under regulation 14 is provided below.

Yours sincerely

**MARCUS SALMON**  
**Sustainable Places Planning Specialist**

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Mrs Lois Wakeman  
Uplyme Parish Council  
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LYME REGIS  
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**Our ref:** DC/2006/000243/AP-  
06/PO2-L01  
**Your ref:**  
**Date:** 05 September 2016

Dear Ms Wakeman

**Uplyme Neighbourhood Plan and Strategic Environmental Assessment  
Scoping Report  
Neighbourhood Planning (General) Regulations 2012 – Consultation under  
Regulation 14**

Thank you for your consultation of 27 June 2016 providing us with an opportunity to comment on the neighbourhood plan and its accompanying strategic environmental assessment (SEA) scoping report. Our comments in respect of the areas within our remit are set out below.

**Vision and objectives (4)**

We support the overarching vision set out in the consultation version of the neighbourhood plan. We also support the plan objectives, in particular objectives D (natural environment) and F (climate change and flooding). These two objectives complement each other.

**Natural environment (11.2)**

We welcome the support amongst the community that there should be no new development in the floodplain. We welcome also the recognition of the main environmental issues and concerns in the parish: landscape, forestry/woodlands, wildlife and flood risk/ivers.

**Landscape (11.3)**

We support policy EN4. It is important that changes to land management contribute to improving the ecological status of the River Lim and certainly should not contribute to a deterioration. As noted in 11.7.2 the river is presently only meeting moderate ecological status and is failing with regard to macrophytes and phytobenthos. These are indicative of elevated nutrient levels which in turn can be related to agricultural land management.

**Wildlife (11.5)**

We support the aims of policy EN6, particularly the commitment to support proposals

which will protect or restore existing sites or to create new habitats.

### **Local green space (11.6)**

We support policy EN7 but recognize that it should also recognise the benefits that green infrastructure can offer in terms of flood risk management.

### **Flood risk and rivers (11.7)**

We are pleased to see how importantly the plan has considered the issue of flood risk within the parish. Paragraph 11.7.1 recognises the most pertinent flooding issues in the catchment. However, it should note that, in addition to the need for a flood risk assessment, development proposals within flood zones 3 and 2 will need to be subject to the sequential test and, if necessary, the exception test which are both set out in paragraphs 100-102 of the National Planning Policy Framework.

We welcome the acknowledgement in paragraph 11.7.2 of the current ecological status of the River Lim and the commitment of the plan to raise awareness of this (and, where possible, seek mitigating measures) so as to prevent deterioration and contribute towards an improvement in ecological status.

### **SEA Scoping report**

In general we consider that the SEA scoping report is adequate. Nonetheless, we have the following advice.

We recommend that in addition to flood zones the baseline section on water (5.12) should also include water quality issues such as the existing ecological status of the River Lim. Likewise, with regard to the environmental problems (6) whilst there is recognition of the need to protect biodiversity and manage flood risk there is no recognition of the need to improve the ecological status of the water body.

Climate change has also correctly be recognised as an environmental problem but we consider that the need for adaptation (not just reducing emissions and adopting renewables) should be emphasised here (as it is in the SEA objectives).

We support the SEA objectives set out in section 7. In particular we welcome objectives 6 (local environment), 7 (open spaces) and 10 (mitigate and adapt to climate).

Yours sincerely

**MARCUS SALMON**  
**Sustainable Places Planning Specialist**

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