

No.	Organisation	<p>Comment- Note, where responses are summarized the full response appears on the District Council website http://eastdevon.gov.uk/planning/neighbourhood-and-community-plans/neighbourhood-plans/neighbourhood-plans-being-produced-in-east-devon/uplyme/#article-content</p>
1	East Devon District Council	<p>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.</p> <p>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.</p> <p>3. Policy UHG4 Following the recent publication of the East Budleigh with Bickton Neighbourhood Plan Examiners Report the Examiner recommended removal of the policy that allocated a rural exception site on the basis 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. 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> <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'.</p>

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 existing 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 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

		<p>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 except in special circumstances where a community benefit will result and the area protected...’</p>
2	Highways England	<p>We are satisfied that the proposed plan policies are unlikely to result in development which will impact on the SRN and we therefore have no specific comments to make.</p> <p>In terms of housing development, we have noted that although no exception sites have been proposed for Raymonds Hill, the plan identifies the potential for some limited market housing to the south of Harcombe Road. Regarding traffic and transport issues, although not constituting plan policy we have noted section 9.2.1 with respect to the A35 and the B3165 junction, particularly with regard to the installation of traffic signals. We have previously provided comments to explain why, on both safety, efficiency and environmental grounds, we believe signals would not be appropriate at this location and it may be helpful to repeat this here.</p> <p>This option was considered as part of our initial study into improvements at Hunters Lodge, and we do recognise that there continues to be strong local support. However, the traffic modelling of the results of signalling this junction identified that it would result in increased queuing both in Lyme Road and Crewkerne Road, as well as significant queuing on the A35 for long periods during peak hours and periods of higher traffic flow. It was considered that this would not offer an appropriate level of safety improvement because of the increased risk of collisions as vehicles join the queue, as well as the level of delay it would cause both on the A35, Lyme and Crewkerne Roads. It would clearly also impact environmentally on the residents of Raymonds Hill in proximity to the junction. A significant difficulty in terms of signalling at this location comes from the staggered nature of the junction which would necessitate 4 phase signals to operate safely. In addition there is only the potential to achieve one running lane in each direction at the junction, which then offers no potential to reduce queue length on the A35 by using two lane approaches to signals.</p>

3	Historic England	No Comment
4	Devon County Council	<p>Thank you for sending this to us. I am commenting on behalf of Devon County Council's Natural Environment team, that sits within the Environment Group. I am not commenting on behalf of the Historic Environment or Flood Risk Management services or the rest of Devon County Council. They are likely to have been notified via our planning colleagues. I have copied this to Sarah Jennings our Ecologist.</p> <p>It is worth you looking at the following webpage as to what DCC can and can't do in relation to preparing a Neighbourhood Plan, https://new.devon.gov.uk/planning/planningpolicies/neighbourhood-planning.</p> <p>You can also look at our wildlife and geology planning guidance webpages, https://new.devon.gov.uk/environment/wildlife/wildlife-and-geology-planning-guidance. There might be some useful information here, but please note that the information on these pages is aimed primarily at people wanting to apply for a planning application, rather than for neighbourhood planning.</p>
5	Mr and Mrs Stacey	<p>Summary of response</p> <p>The reference in 6.1.5 to the Raymond's Hill site should be deleted. The site should not be identified as being suitable for housing</p>
6	Mr D Ostler (two representations)	<p>Summary of responses</p> <p>The school's detailed planning application should include a path on the opposite side of the road as per Devon Highways drawing.</p> <p>Traffic needs to flow freely, and unobstructed, through this stretch of the road.</p>

7	National Grid	An assessment has been carried out with respect to National Grid's electricity and gas transmission apparatus which includes high voltage electricity assets and high pressure gas pipelines, and also National Grid Gas Distribution's Intermediate and High Pressure apparatus. National Grid has identified that it has no record of such apparatus within the Neighbourhood Plan area.
8	Natural England	No additional comments, welcome the submission version
9	Sibbett Gregory for Betterment Properties	Summary of Response Delete site E, no justification for its protection.
10	South Somerset District Council	No Comment
11	South West Water	No Comment
12	Sport England	<p>Planning Policy in the National Planning Policy Framework identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process and providing enough sports facilities of the right quality and type and in the right places is vital to achieving this aim. This means positive planning for sport, protection from unnecessary loss of sports facilities and an integrated approach to providing new housing and employment land and community facilities provision is important.</p> <p>It is important therefore that the Neighbourhood Plan reflects national policy for sport as set out in the above document with particular reference to Pars 73 and 74 to ensure proposals comply with National Planning Policy. It is also important to be aware of Sport England's role in protecting playing fields and the presumption against the loss of playing fields (see link below), as set out in our national guide, 'A Sporting Future for the Playing Fields of England – Planning Policy Statement'.</p> <p>http://www.sportengland.org/facilities-planning/planning-for-sport/developmentmanagement/planning-applications/playing-field-land/</p> <p>Sport England provides guidance on developing policy for sport and further information can be found following the link below:</p> <p>http://www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/</p> <p>Sport England works with Local Authorities to ensure Local Plan policy is underpinned by robust and up to date assessments and strategies for indoor and outdoor sports</p>

		<p>delivery. If local authorities have prepared a Playing Pitch Strategy or other indoor/outdoor sports strategy it will be important that the Neighbourhood Plan reflects the recommendations set out in that document and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support the delivery of those recommendations.</p> <p>http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-andguidance/ If new sports facilities are being proposed Sport England recommend you ensure such facilities are fit for purpose and designed in accordance with our design guidance notes.</p> <p>http://www.sportengland.org/facilities-planning/tools-guidance/design-and-costguidance/ If you need any further advice please do not hesitate to contact Sport England using the contact details below.</p>
13	TM Sweeney	<p>Summary of Response Fully support Neighbourhood Plan</p>
14	Trustees of Mrs Ethelston and Bestic School Foundation	<p>Summary of Response Alternative wording for Policy UEM5 to explain that any future uses will be explored at the time and that the Trustees current preferred use is residential in order to maximise the value of the site in line with Charities law.</p>
15	West Dorset District Council	<p>Given the proximity of Uplyme and Lyme Regis there is undoubtedly a close relationship between the settlements with Uplyme reliant on Lyme Regis for education, employment, retail and health services. Similarly, there is an increasing need for the Uplyme area to aid in meeting the housing and employment needs of Lyme Regis. The existing commitment between East Devon and West Dorset local authorities to work together on cross boundary planning matters in the Lyme Regis/Uplyme area will help to ensure that cooperation continues. It is however important the neighbourhood plan takes into account the interactions between the two settlements and plans positively for them.</p> <p>The Neighbourhood Plan seeks to keep the identity of Uplyme separate to Lyme Regis. We accept it may be desirable to maintain the separate physical identity of the two settlements; however given the proximity of Uplyme to Lyme Regis the functional relationship needs to be recognised and planned for. We welcome the inclusion within the plan of a statement to this effect at paragraph 5.1.4 however would like to see specific mention of housing need in Lyme Regis within a policy.</p> <p>It is noted that an assessment of the need for affordable housing has been undertaken and we welcome the inclusion of information on the need for affordable housing arising from Lyme Regis within this. The need as set out in paragraph 6.1.4 seems to be 14 households arising from the Uplyme area and 54 arising from the Lyme Regis area; a total of 68 households. However it appears as though, despite the significant identified need in the local area, the sites proposed to meet this need will only deliver between 16 and 19 new affordable dwellings.</p> <p>Although the housing needs of Uplyme may be limited the high levels of need in Lyme Regis should not be ignored. Lyme Regis is heavily constrained due to coastal erosion, flooding, topography and the A3052, it is therefore</p>

		<p>important that that housing needs and future growth of Lyme Regis are not ignored in the Uplyme Neighbourhood Plan. This issue will be especially important when justifying residential development within the extended BUAB of Uplyme.</p> <p>The duty to cooperate is integrated into National Planning Policy and is reflected in both the East Devon and West Dorset, Weymouth & Portland Local Plans. The following text is also included in the context of Lyme Regis in the West Dorset, Weymouth & Portland Local Plan.</p> <p>“Development opportunities in and around Lyme Regis are limited due to land instability, highway and landscape constraints....Further opportunities around Lyme Regis, including land in East Devon will need to be explored”.</p> <p>West Dorset District Council welcome the mention of the East Devon Local Plan which highlights the importance of Uplyme and Lyme Regis working together to deliver the requirements of both communities however we recommend there be a formal policy included in the Uplyme Neighbourhood Plan to take into account cross boundary issues in particular the need for the housing needs of Lyme Regis to be considered in relation to development at Uplyme.</p> <p>The Uplyme Neighbourhood Plan Appendix A map ‘Built-up Area Boundary & proposed amendments’ proposes to alter the BUAB adjacent to the Dorset/Devon border and adjacent to Lyme Regis. It is important that the parish and District Councils work closely with Lyme Regis and West Dorset when proposals are progressed on this and other sites within Uplyme.</p>
16	Environment Agency (late)	<p>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</p>