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| Mr Duncan SmithWest Devon Borough CouncilForward PlanningKilworthy ParkTavistockDevonPL19 0BZ | **Our ref:** DC/2014/115021/AP-10/PO1-L01**Your ref:** **Date:**  05 August 2020 |

Dear Mr Smith

**Bridestowe and Sourton Neighbourhood Development Plan 2016 – 2034 (Regulation 16 version)**

Thank you for your consultation of 17 June 2020 providing us with the opportunity to comment on the submission version of the Bridestowe and Sourton neighbourhood plan.

**Environment Agency position**

While we support the neighbourhood plan’s overarching vision, objectives and environmental policies, we have some concerns about the allocation shown in Policy H3a – Land Adjacent to the Cemetery because this site includes an area of land in flood plain within the red line boundary. There is no evidence provided that the flood risk Sequential Test has been undertaken.

Our detailed comments on the plan are provided below.

**Comments**

We support the neighbourhood plan’s overarching vision/objectives. In particular we are supportive of the requirement for development to be sustainable and not detrimental to the environment. We also welcome the aims to conserve and enhance biodiversity and to encourage low carbon development.

We are pleased to see that some environmental policies have been introduced in this version of the plan e.g. Policy H8 Flood Risk and Policy EH4 Wildlife Protection.

We welcome the requirement in Policy H8 Flood Risk for development to be located away from areas at risk of flooding. However, we have some concerns about the allocation shown in Policy H3a – Land Adjacent to the Cemetery because this site includes an area of land in Flood Zone 3 (high probability of flooding) within the red line boundary. There is no explanation in the supporting text regarding flood risk or stating that the flood risk Sequential Test was undertaken prior to the inclusion of this allocation. If the Sequential Test has not been undertaken, this would be contrary to the NPPF and may be considered inconsistent with the Joint Local Plan, so may result in the NDP being found unsound.

To overcome this concern we would recommend that the site boundary is re-drawn to exclude Flood Zone 3. If there is no flood zone within the allocation boundary, the Sequential Test would not be required. Nevertheless, we would still advise that the policy wording is altered because we consider that a site specific Flood Risk Assessment (FRA) will be required to define the true flood extent early in the planning process so that it is clear all development, including new buildings and land raising, will avoid encroachment into the floodplain at that edge of the site.

It is important to ensure that the floodplain corridor adjacent to the River Lew remains free from all development to avoid increasing flood risk within Bridestowe. You may therefore wish to allocate the land to the south of Policy H3a as open space to secure a green corridor adjacent to the river and ensure that the floodplain is not developed. This will ensure that flood risk is not increased. It will have other benefits for the parish, e.g. in addition to amenity, health and recreation benefits for the community, it would also potentially result in environmental gains for riverside biodiversity and protection of water quality.

With regard to nature conservation, we support bullet d) in Policy H6 Conversion of Buildings in the Countryside, which seeks to retain any nature conservation interest within the site, and also to provide net gains where possible. However, we recommend that net gain should be an objective of all development and not just conversions. We would therefore recommend that Policy EH4 Wildlife Protection should also include a requirement for development to provide biodiversity net gains.

Please contact us again if you require any further advice.

Yours sincerely

**SARAH SQUIRE**

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