

Mr Cameron Whymer  
West Devon Borough Council  
Planning Policy  
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**Our ref:** DC/2014/115020/AP-  
27/SB1-L01  
**Your ref:**  
**Date:** 26 October 2023

Dear Mr Whymer

### **Okehampton Town and Hamlets Neighbourhood Plan: Regulation 16 Consultation**

Thank you for your consultation of 15 September 2023 providing us with the opportunity to comment on the submission version of the Okehampton neighbourhood plan.

We welcome that the vision for the plan is for the delivery of sustainable development. We think this could be strengthened if the definition of sustainable development incorporated the need for the community to be resilient to the effects of climate change. Overall, we would welcome a bigger emphasis on climate change adaptation throughout the plan.

We support the emphasis on Green Space and Green Infrastructure in the plan and Policy Objectives 1, 2 and 3 which focus on protecting and enhancing the green spaces and the natural environment. We are pleased to see that Policy PP3: Green Spaces and Green Infrastructure promotes the provision of net gains in biodiversity and wildlife opportunities. It would be great if the plan had as much focus on Blue Infrastructure within the Plan area. This might include consideration of how flooding can be avoided, reduced and managed within the Okehampton Town and Hamlets, as well as consideration of water quality.

Within the plan area, there are a number of watercourses. For information, environmental data showing the ecological/chemical status of waterbodies can be viewed at: <http://environment.data.gov.uk/catchment-planning/RiverBasinDistrict/8>. With regard to the objectives of the Water Framework Directive, to the north of the town the River Okement is at moderate Ecological Status. The East Okement River is at good Ecological Status, while the West Okement River is at poor Ecological Status. New development must not cause deterioration from the present status and opportunities to achieve a good status should be sought. This would have benefits for the environment, as well as the community and attracting economic investment.

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Avoiding developing in the floodplain is a robust way of preventing flooding. Where there is no alternative to developing within a flood risk area, new development must be designed to be safe from flooding, not increase flood risk elsewhere and, where possible, reduce flood risk overall. Further information on flood risk can be found at: <https://www.gov.uk/guidance/national-planning-policy-framework/14-meeting-the-challenge-of-climate-change-flooding-and-coastal-change>  
<https://www.gov.uk/guidance/flood-risk-and-coastal-change>.

With the above in mind, we do have some concerns about the Policy PP2: Use of brownfield sites. We note that some of the sites listed in the policy are either partly or wholly within Flood Zones 2 and 3. While we support the approach of developing brownfield sites first in principle for sustainability reasons, we are concerned about promoting development on sites which are at risk of flooding. If these sites are considered allocations, there would be a requirement for the flood risk Sequential and Exception tests to be applied.

We have previously provided advice on policies within the Kingsbridge and Dartmouth neighbourhood plans, which contained Brownfield First policies where preference was given to the development of certain sites within the floodplain. In order to make these policies acceptable and in line with the NPPF and Plymouth and South West Devon Local Plan policies, we advised that the text should make it very clear that the listed sites are not allocations and the policy should state that they are simply sites that the community may look favourably on for intensification or redevelopment. The policy text should also make it clear that any development proposals on sites within the floodplain will be subject to the Sequential and Exception tests and these tests must be satisfied before development will be permitted. We also sought to ensure that, as a minimum, as well as being safe from flooding over its lifetime, new development on such sites will contribute to reducing the overall flood risk to the town. We recommend that this text is included within the policy to ensure that such development results in a betterment to the town. This would make it consistent with the approach taken in the Dartmouth Neighbourhood Plan.

Please contact us again if you require any further advice.

Yours sincerely

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