

Mr Duncan Smith
South Hams District Council
Planning Policy
Follaton House Plymouth Road
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Our ref: DC/2014/115020/AP-
26/SB1-L01
Your ref:
Date: 02 March 2022

Dear Mr Smith

Kingsbridge, West Alvington and Churchstow Neighbourhood Plan: Regulation 16 Consultation

Thank you for your consultation of 27 January 2022 providing us with the opportunity to comment on the submission version of the Kingsbridge, West Alvington and Churchstow neighbourhood plan.

We support the neighbourhood plan's vision statement, including point 1 which states that water is celebrated, protected and enhanced and point 2 which supports development that enhances natural assets. We welcome the aims relating to protecting the natural environment, preventing flooding and carbon and energy reduction, and the associated objectives. In particular, we are supportive of the objective to mitigate and adapt to climate change. We would therefore like to see climate change adaptation given greater emphasis in the plan, perhaps for example through the inclusion of an additional policy relating to climate change adaptation.

We welcome the environmental policies set out in the plan. We are supportive of policies Env 3 Impact on the Natural Environment and its commitment to biodiversity net gain and policy Env 7 Carbon Reduction. We are also pleased to see the inclusion of a policy on prevention of flooding and the impact on water quality. However, we consider that policy Env 6 should have a greater emphasis on avoiding development within flood risk areas, unless no alternative sites are available. Avoiding developing in the floodplain is a robust way of securing the plan's objective 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> and <https://www.gov.uk/guidance/flood-risk-and-coastal-change>.

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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 the Kingsbridge Estuary is at Moderate Ecological Status in this location. 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.

We have previously commented on policy BE1 Brownfield first. While we support the approach of developing brownfield sites first in principle for sustainability reasons, we note that several of the sites listed in the Appendices are either wholly or partially located within Flood Zones 2 or 3. We are pleased to with how the policy text has been amended in response to our previous comments, which raised concerns about promoting development on sites which are at risk of flooding. Such development would be contrary to the plan's objective to prevent flooding.

We note that the sites are not allocated for development, they are simply sites that the community may look favourably on for intensification or redevelopment. The policy now also sets out that the Sequential and Exception Tests need to be successfully applied. We support these changes. However, we have previously advised that, as a minimum, as well as being safe from flooding over its lifetime, we would expect development on such sites to contribute to reducing the overall flood risk to the town. We would recommend that this text is included within the policy to ensure that such development results in a betterment to the town and contributes to the plan's objective to prevent flooding. This would make it consistent with the approach taken in the Dartmouth Neighbourhood Plan.

With regard to policy BE2 Kingsbridge Quayside and town square, we are pleased that there is a requirement for flood risk mitigation and management measures. It also recognises potential water quality impacts and the requirement for the Sequential and Exception Tests.

Please contact us again if you require any further advice.

Yours sincerely

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