

Ms Maria Toynton  
East Devon District Council  
The Knowle  
Sidmouth  
Devon  
EX10 8HL

**Our ref:** DC/2006/000243/AP-  
16/IS1-L01  
**Your ref:**  
**Date:** 02 January 2015

Dear Ms Toynton

**APPLICATION FOR DESIGNATION OF A NEIGHBOURHOOD AREA  
PARISH OF CYST ST GEORGE**

Thank you for your consultation of 18 December 2014 consulting us on the above designation request.

We have no objections to this application to designate the parish as a neighbourhood area. However, at this early stage in the Neighbourhood Plan process we would like to take this opportunity to highlight the environmental constraints that are likely to need further consideration as the Plan develops.

The floodplains associated with the River Clyst and Grindle Brook as well as the watercourse which flows north-west towards the Grindle Brook (to the east and north of Cyst St George) and the small watercourse through Ebford put a significant portion of the parish at risk of flooding. In line with the National Planning Policy Framework we would seek any new development to be directed to areas outside Flood Zone 3 (High probability) and Flood Zone 2 (Medium probability). Any new development which has to be located in these flood zones would need to be safe for its lifetime (including allowance for Climate Change), not increase flood risk elsewhere and, where possible, reduce flood risk over all.

In addition, we would be looking for new development to manage surface water drainage on site through the use of Sustainable Drainage Systems to ensure that surface water flooding risks are not increased and, where possible, are reduced.

With regard to the objectives of the Water Framework Directive the Grindle Brook is at Bad Ecological Status. The water-body is failing with regard to fish. The Lower Clyst and Exe Estuary are both at Moderate Ecological Status. Both water-bodies are failing with regard to invasive non-native species whilst the Exe Estuary is also failing due to Dissolved Inorganic Nitrogen. It is the target for these water-bodies to

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meet Good Ecological Status by 2027. Therefore, any new development must not cause deterioration from the present status and should seek opportunities to meet the desired status.

We also recommend that the plan references the Catchment Based Approach; not necessarily how the plan ties in with the East Devon Catchment Partnership but at a more local scale what consideration will be given to the environment up and down stream of the area.

We would welcome further consultation on the next stage of the Plan to identify any opportunities to deliver shared outcomes through the Plan.

Yours sincerely

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