

Mr Timothy Spurway  
East Devon District Council  
The Knowle  
Sidmouth  
Devon  
EX10 8HL

**Our ref:** DC/2006/000243/AP-  
20/IS1-L01  
**Your ref:**  
**Date:** 19 August 2015

Dear Mr Spurway

## **APPLICATION TO DESIGNATE A NEIGHBOURHOOD PLAN AREA FOR BUDLEIGH SALTERTON**

Thank you for your consultation of 28 July 2015 providing us with the opportunity to comment on the above designation request.

We have no objections to this application to designate the parish as a neighbourhood plan area. However, at this early stage in the neighbourhood planning 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 Otter and Knowle Stream as well as the ocean puts parts of the parish at risk of flooding including. In particular the Knowle Stream puts parts of the town centre itself at risk. 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. Nonetheless, please note that Devon County Council, as Lead Local Flood Authority, is now the lead authority for surface water matters.

It should be noted, should any development be allocated along the coastline, that the recommendation of the Shoreline Management Plan in this area is for 'hold the line' along the sea front in the town and 'no active intervention' along the rest of the Parish's coastline. The policy of 'no active intervention' assumes that existing

Environment Agency  
Sir John Moore House Victoria Square, Bodmin, Cornwall, PL31 1EB.  
Customer services line: 03708 506 506  
[www.gov.uk/environment-agency](http://www.gov.uk/environment-agency)

Cont/d..

defences are no longer maintained and will fail over time or undefended frontages will be allowed to evolve naturally.

With regard to the objectives of the Water Framework Directive the Otter Estuary and the adjacent coastal waters are at Good Ecological Status. It is the target for these water-bodies to meet Good Ecological Status by 2027. Therefore, any new development must not cause deterioration from the present status.

We also recommend that the plan references DEFRA's 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 your plan to identify any opportunities to deliver positive outcomes for shared priorities through it.

Yours sincerely

**MARCUS SALMON**  
**Sustainable Places Planning Specialist**

Direct dial 01208 265046

Direct fax 01208 78321

Direct e-mail [marcus.salmon@environment-agency.gov.uk](mailto:marcus.salmon@environment-agency.gov.uk)