

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

Our ref: DC/2006/000243/AP-
24/IS1-L01
Your ref:
Date: 11 December 2015

Dear Mr Spurway

APPLICATION TO DESIGNATE A NEIGHBOURHOOD PLAN AREA FOR KILMINGTON PARISH

Thank you for your consultation of 23 November 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 Axe, River Yarty and Corry Brook put parts of the parish at risk of flooding. Whilst the majority of existing development in the parish is located outside these areas, parts of Kilmington village itself are at risk of flooding from the brook which flows from Spring Head via Silver Street and The Street. 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, Devon County Council, as Lead Local Flood Authority, are now the lead authority for surface water matters.

With regard to the objectives of the Water Framework Directive the (Lower) River Axe, River Yarty and Corry Brook at this location are all at Moderate Ecological

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Status. All three water-bodies are failing with regard to Macrophytes/Phytobenthos and Phosphates. These failing elements indicate high levels of nutrients which in these catchments is largely attributable to agricultural and other land management activities. 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 and the Neighbourhood Plan 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 your plan to identify any opportunities to deliver positive outcomes for shared priorities through it.

Yours sincerely

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