

Miss Claire Rodway  
East Devon District Council  
The Knowle  
Sidmouth  
Devon  
EX10 8HL

**Our ref:** DC/2006/000243/AP-  
31/PO2-L01  
**Your ref:**  
**Date:** 01 December 2017

Dear Miss Rodway

### **Ottery St Mary and West Hill Neighbourhood Plan – Submission Consultation**

Thank you for your consultation of 11 October 2017 in respect of the above neighbourhood plan consultation.

We are generally supportive of the objectives and policies set out in the submission draft of the Ottery St Mary neighbourhood plan.

With regard to the Environment Objectives we welcome inclusion of objectives to preserve/enhance habitats and address flood risks wherever possible. We would, however, also recommend the inclusion of an objective that seeks to improve the quality of the water environment in the parish. At present the River Otter through the parish is classified as being at Poor Ecological Status and is failing with regard to phosphates and macrophytes/phytobenthos (both indicating high nutrient levels).

Within policy NP1 (development in the countryside) we support the requirement for new development to protect habitats, especially tree lined streams and wetlands.

We support the aims of policy NP7 (flood defences). However, we recommend a more ambitious policy is developed which goes further than simply supporting proposals for new flood defences. The policy could be more prescriptive in encouraging/supporting all development (except perhaps minor development) to play its part in improving flood risk management within the plan area.

Examples of how proposals might contribute to an overall reduction in risk to a development and, more importantly, to the rest of the community might involve requiring developments:

- outside the floodplain to be designed in such a way that surface water is slowed-down/held-up compared to the pre-development state,
- adjacent to or within (if necessary) the floodplain to seek opportunities for floodplain

Environment Agency  
Manley House Kestrel Way, Sowton Industrial Estate, Exeter, EX2 7LQ.  
Customer services line: [REDACTED]  
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- restoration/enhanced flood storage,
- within the flood zone (if deemed necessary in such a location) contributing towards new/upgrade flood defences for the community.

This sort of approach is consistent with and builds upon national policy requirements that development must be safe for people and property over its lifetime without increasing flood risks elsewhere and, wherever possible, reducing flood risks overall.

In addition, we support NP8 (protection of local wildlife sites) and Project 2 to develop a local green infrastructure network. Green infrastructure can deliver significant multi-functional benefits in terms of biodiversity, flood risk, water quality, amenity, health and recreation.

We are pleased that the need to upgrade the sewerage and sewage treatment infrastructure to accommodate new houses in the parish.

Yours sincerely

**MARCUS SALMON**  
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