

Ms Angela King  
East Devon District Council  
The Knowle  
Sidmouth  
Devon  
EX10 8HL

**Our ref:** DC/2006/000243/AP-  
35/PO2-L01  
**Your ref:**  
**Date:** 08 June 2021

Dear Ms King,

## **DALWOOD NEIGHBOURHOOD PLAN - REGULATION 16 CONSULTATION**

Thank you for your consultation of the 6<sup>th</sup> May 2021 providing us with the opportunity to comment on the submission version of the Dalwood Neighbourhood Plan.

We were consulted by the Neighbourhood Plan Steering Group and provided comments in March 2021. The Plan remains broadly unchanged in the context of our comments, so we take this opportunity to reiterate the points made in our previous letter which is reproduced below:

We support of the neighbourhood plan's overarching aims and objectives. In particular we are supportive of the plan's aim to protect and enhance the natural environment, including ecology. We do however, consider that there is scope to add additional value to the plan upon matters within our remit. We provide the following guidance.

### **Biodiversity and Net Gain**

We support policy NE1: 'Conserving and Enhancing the Natural Beauty of our Parish' (1). We recommend that you consider the aim to embed Net Gain as a policy within strategic plans as set out in the Government's 25 Year Environment Plan. This policy could include this aim within NE1-1(ii) by simply removing 'where there is the opportunity to do so' in the policy.

### **Flood Risk**

Whilst Aim 1 outlines the objective (b) for flood protection/mitigation, we would encourage you to consider whether there is further scope to embed this within one of the policies. The plan refers to the Corry Brook as a Green corridor. Green infrastructure provides more than recreational, amenity and wildlife benefits but also benefits in terms of flood risk management and protecting water quality. It would be good if the plan acknowledged this.

Environment Agency  
Manley House Kestrel Way, Sowton Industrial Estate, Exeter, EX2 7LQ.  
Customer services line: 03708 506 506  
[www.gov.uk/environment-agency](http://www.gov.uk/environment-agency)

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As a reflection of both National Planning Policy, and Local policy, there may be an opportunity, when drafting this plan, to specify that development should consider flood risk both, in relation to locating development, and through proposing mitigation measures relating to the effects of climate change. Aim 1, objective b) is for flood protection/mitigation measures. It would be good for the plan to expand on this point and identify possible opportunities to deliver this.

We note that the settlement boundary excludes the central band of open space liable to flooding. We consider that this is a positive precautionary approach.

### **Water Quality**

Whilst the plan has addressed natural environment and some flood risk issues, it has not acknowledged other pertinent environmental issues within the neighbourhood plan area.

With regards to the objectives of the Water Framework Directive, the Corry Brook is currently classified overall as having a 'Moderate' status for both biological quality and physio-chemical quality elements, notably Phosphate. This can be an indication of pollution from runoff from agricultural land. Section 1.2 describe the parish area as rural, with a significant proportion of land use being agricultural. The draft plan should also acknowledge this aspect of the area and consider the ways in which improvements to the status' can be achieved through land use and planning.

We are in support of aim 11, objective a) and aim 14 objective b) to encourage measures to uphold best practice farming methods, especially the management of land within a flood catchment area. It would be good for the plan to expand on this to provide examples of how this will work in practice.

### **Renewable Energy**

We support policy ELC1 regarding renewable energy schemes. It would be good to acknowledge that any renewable proposals also need to demonstrate that they have no adverse impact on natural processes, such as fish pass (Hydroelectric power- HEP), flood flow (solar panels/HEP) and groundwater quality (wind turbines), and provide a Net Gain for biodiversity.

Please contact us again if you require any further advice,

Yours sincerely

**Harriet Fuller**  
**Planning Advisor**