

Mr Graham Swiss
South Hams District Council
Planning Policy
Follaton House Plymouth Road
Totnes
Devon
TQ9 5NE

Our ref: DC/2014/115020/AP-
03/IS1-L01
Your ref:
Date: 17 October 2014

Dear Mr Swiss

Application to designate a Neighbourhood Plan area for Stoke Gabriel

Thank you for your email of 05 September 2014 consulting us on the above designation request.

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

The floodplains associated with the River Dart estuary and the watercourse running down from Collaton St Mary put parts of the parish at risk of flooding although. With regard to the village itself only the area around Coombe Chute and Byter Mill Lane at shown as at risk on the Flood Map. However, our Flood Map for Surface Water suggests a surface water flood risk from the junction of Flood Street and Paignton Road, through Madicks Orchard, New Road and down to Coombe Chute.

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. We would also 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 (WFD) the Dart Estuary is currently at Moderate Ecological Status. The estuary is failing due to Dissolved Inorganic Nitrogen and is considered a Highly Modified Water Body. It is the target for the water body to meet Good Ecological Status by 2027. Therefore, any new

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development must not cause deterioration from the present status and should seek opportunities to meet the desired status.

We would also recommend that the plan makes reference to the Catchment Based Approach; not necessarily how the plan ties in with the South Devon Catchment Partnership but at a more local scale what consideration is 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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