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From: [REDACTED]
Sent: 03 March 2023 11:49
To: Planning Consultation (DPD)
Subject: Silverton Neighbourhood Plan response form Environment Agency.
Attachments: Silverton Neighbourhood Plan Reg 15.docx

Importance: High

Please find attached the above response,
Regards

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Silverton Neighbourhood Plan, Mid Devon, Reg 15/16 response

Environment Agency (EA)

The following are the EA comments on the above, suggested alterations and additions to policy wording is highlighted in yellow for your ease.

The EA welcomes the recognition of the Climate Emergency in the Foreword, the Plan's aim for net zero and the creation of a Green Action Group to deliver this.

Chapter 6 - Vision Aim and Objectives

The Theme of Natural Environment (NE) would be better represented by 'enjoying, respecting **and enhancing nature**, the countryside and the rural setting' and similarly NE point 7 in the table to follow on page 12 could perhaps better promote wildlife and biodiversity enhancement rather than just suggesting that future development doesn't compromise it.

We welcome the embedded theme of net zero and carbon reduction in the aims of the Plan.

P13 There is no mention of flood resilience in the Housing Aims. There is a flood zone cutting through Silverton and we would strongly advocate that a bullet point is included to ensure any new development is out of the floodplain and existing housing and wider community looks to become more resilient and adaptive to future flood events and the impact of climate change.

Flooding is mentioned in the NE objectives on page 18, but not on page 12. Page 12 table carries only 7 objectives for NE but page 18 has 8 objectives?

Chapter 8 – Natural Environment

Given the huge decline in UK biodiversity and the emergence of Biodiversity Net Gain and its agenda, we consider that policy EN01 could be stronger, suggestions below (alterations in yellow):

*1. Development proposals will only be supported where they have demonstrated that there are minimal impacts on the natural environment (landscape and biodiversity) **and they satisfactorily mitigate these impacts and enhance the natural environment. (last caveat deleted as enhancement is rarely unachievable)***

2. Where mitigating measures are unavoidably required for development to be acceptable within its landscape setting, appropriate landscaping should be employed to mitigate the impact of the development, and such measures should include the use of native species of trees and hedges where planting is required.

3. Where change to existing traditional Devon banks is unavoidable, proposals for development which affect traditional Devon hedges will only be supported where they have demonstrated that options have been assessed and, as a result, have proposed the least

damaging option (to the hedgerow / bank, setting in the landscape, biodiversity and habitats). Such hedge loss shall be mitigated for.

EN03 on greenspaces. Given some of these are within or adjacent to the flood zone it may be worth considering including a suggestion that where possible these sites be enhanced to accommodate 'blue infrastructure' i.e. wet areas which can aid in alleviating flood issues and help with future flood resilience should the opportunity arise.

We applaud the inclusion of policy EN04 and its inclusion of both fluvial flood risk and surface water flooding issues. However the explanation and justification could be clearer on also not supporting new development within the floodzone which at present neither the policy nor explanation are explicit on but perhaps should be.

Chapter 9 – Built Environment

Either this section or the housing and employment section should carry something stating that new buildings will be expected to incorporate water efficiency measures. Water usage in Devon is as increasing issue as water is becoming scarce and we are still in a declared period of drought and this pattern and issue is expected to continue as a result of changing weather due to climate change. Increased water efficiency and grey water rain water recycling on newbuilds not only reduces demand for drinkable water but also reduces the amount of water being treated and put into sewer systems.

Chapter 10 – Housing

Suggested that 'water efficiency' is added to point 10 next to energy efficiency 'energy and water efficiency'.

We welcome the inclusion of Biodiversity Net Gain within the allocated housing site policies.

Policy HS06 and TR04 – it may be advisable that the supporting text or policy encourages these spaces to be of a permeable material in order to ensure surface water run off issues are minimised.

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