

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

**Our ref:** DC/2014/115020/AP-  
24/PO2-L01  
**Your ref:**  
**Date:** 29 March 2022

Dear Mr Smith

### **Dartmouth Neighbourhood Plan: Regulation 16 Consultation**

Thank you for providing us with the opportunity to comment on the submission version of the Dartmouth Neighbourhood Plan.

We are pleased with how our comments on the previous version of the plan have been incorporated into the submission version and consider that it adequately addresses the environmental matters within our remit.

We support the neighbourhood plan's overarching vision. In particular we are supportive of the aim for new development to conserve green space, encourage biodiversity and protect against coastal erosion and flooding. However, we recommend that adaptation to climate change is given greater emphasis in the vision.

We support the inclusion of themes and objectives relating to the green environment, and note that the submission version now includes an objective to safeguard water quality in line with our previous recommendation. This objective would have benefits for the environment, as well as the community and attracting economic investment.

We welcome the range of environmental policies set out in the plan. In particular, we are supportive of policies GE2 Safeguarding Biodiversity and GI, GE5 Maintaining the Character and Environmental Quality of the River, GE7 Mitigation for climate change and GE11 Prevention of Flooding. We are pleased to note that the wording of policy GE11 has changed from the previous consultation version and now has greater emphasis on steering development away from flood risk areas. We consider that avoiding developing in the floodplain is a robust way of securing the Plan's objective of preventing flooding.

We also welcome the changes that have been made to policy TE5 Brownfield first following our previous recommendations. It is now clear that the sites listed in the

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appendix are not allocations and the policy also sets out the flood risk requirements for new developments, including the need to satisfy the Sequential and Exception Tests. We particularly support the inclusion of the wording: As a minimum, as well as being safe from flooding over its lifetime, development on such sites must also contribute to reducing the overall flood risk to the town.

We also support the changes to policy HW1 regarding the former hospital site, which now references the flood risk requirements for the re-use of the site.

Please let me know if you require any further advice.

Yours sincerely

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