

Mrs Lesley Hughes
Ivybridge Town Council
Erme Court (Town Hall) Leonards Road
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Our ref: DC/2014/115020/AP-
09/PO1-L01
Your ref:
Date: 04 September 2015

Dear Mrs Hughes

Ivybridge Neighbourhood Plan – Draft Version

Thank you for your consultation of 09 July 2015 in respect of the above. We apologise for our delay in responding.

Overall we welcome the aspirations and objectives set out in the draft version of the Ivybridge Neighbourhood Plan, in particular those relating to improving the town's focus on, the access to and the health of the River Erme. However, we provide the following advice and recommendations to strengthen the proposed plan from an environmental perspective.

3. Vision and Objectives

Improving the town's relationship with the River Erme and enhancing this important asset for Ivybridge are central to many of the objectives set out in the draft plan, not just in terms of environment objectives but those relating to transport/movement, shopping/town centre and community.

With specific regard to the Environment objectives we welcome the objectives in respect of green space, biodiversity and reducing pollution in the River Erme. However, it is noted that there is no objective relating to flood risk management although parts of the town are at risk from fluvial (river) or surface water flooding. We therefore recommend the inclusion of an objective relating to reducing the risks or consequences of flooding.

We would also recommend that for any of the objectives relating to the River Erme corridor (e.g. the access for cyclists/pedestrians or town centre objectives) opportunities should be sought to make the river corridor as natural as possible. We would be happy to discuss any opportunities for environmental enhancement along the River Erme Corridor.

With regard to the objectives of the Water Framework Directive the River Erme through Ivybridge is at Moderate Ecological Status. The water-body is failing with regard to barriers to fish movements (e.g. weirs and other obstructions). It is the target for water-bodies to meet Good Ecological Status by 2027. Therefore, any new developments must not cause deterioration from the present status and the

Neighbourhood Plan should seek opportunities to meet the desired status.

4. Policies and Proposals

With regard to the 'Town Centre' policies we welcome proposed policies INP1 (town centre regeneration), INP2 (land east of the River Erme) and INP3 (Glanville's Mill) which again commit to creating a better relationship between the town centre and the River Erme and improving access to the river.

However, our Flood Map indicates that some land within the boundaries covered by these 3 policies is at risk of flooding from the River Erme but there is currently no acknowledgement of these risks within the policies. We recommend therefore that the policies include a commitment to improving the resistance and resilience of development in these areas and to pursuing any opportunities that might arise from redevelopment to reduce flood risk overall (e.g. by making space for flood water and naturalising the river corridor).

With regard to the 'Town as a whole' policies we welcome the recognition in the supporting text that the River Erme is 'the town's principle natural asset' (paragraph 4.20) and the aim of the plan to conserve and enhance 'open spaces, woodlands and watercourses' (paragraph 4.21).

Policy INP8 (Historic and natural environment) includes specific commitments to protect and enhance water quality in the River Erme and other watercourses as well as to keep open spaces free from development. We welcome these commitments. The latter will be important in areas adjacent to the River Erme especially with regard to making space for flood waters. We recommend the policy or supporting text refers to this benefit that open space can provide. We would also welcome a commitment to, wherever possible, increasing provision of open space particularly adjacent to watercourses.

Yours sincerely

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