



East Devon Local Plan
Publication Stage (Regulation 19)
Representation Form

Ref:

(For official use only)

Name of the Local Plan to which this representation relates: East Devon Local Plan 2020-2042

Please return to East Devon District Council, Local Plans Team, Blackdown House, Border Road, Honiton, EX14 1EJ, upload onto our consultation portal at <https://eastdevonlocalplanreg19.commonplace.is/> or email to localplan@eastdevon.gov.uk by **31 March 2025**

This form has two parts:

Part A – Personal Details: Needs to be completed only once.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A: Personal details

1. Personal details*

*If an agent is appointed, please complete only the Title, Name and Organisation (if application) boxes below but complete the full contact details of the agent in section 2.

Full name	<input type="text" value="Mr Simon Croft"/>
Are you acting as an agent for another party?	<input type="text" value="No"/>
Organisation (where relevant)	<input type="text" value="South West Water"/>
Address line 1	<input type="text"/>
Address line 2	<input type="text"/>
Address line 3	<input type="text"/>
Postcode	<input type="text"/>
Email address	<input type="text"/>



Part B – Representation

Please use a separate sheet for each representation

2. To which part of the East Devon Local Plan does this representation relate? Please write down the paragraph or policy number that your representation relates to.

Paragraph Policy Policies Map

3. Do you consider that this part of the East Devon Local Plan is legally compliant?

Yes No

3 (a). If yes, and you wish to support the legal compliance of this part of the East Devon Local Plan, please use this box to set out your comments.
(Continue on a separate sheet if necessary)

N/a

3 (b) If no, please give details of why you consider this part of the East Devon Local Plan is not legally compliant. Please be as precise as possible.
(Continue on a separate sheet if necessary)

N/a

3 (c). Please set out the modification(s) you consider necessary to make this part of the East Devon Local Plan legally compliant, in respect of any legal compliance matters you have identified at 4(b) above. You will need to say why each modification will make this part of the East Devon Local Plan legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.
(Continue on a separate sheet if necessary)

N/a

4. Do you consider that this part of the East Devon Local Plan is Sound?

Yes

No

4 (a). If yes, and you wish to support the soundness of this part of the East Devon Local Plan, please use this box to set out your comments.

(Continue on a separate sheet if necessary)

The recognition of the critical need for development to be adaptable and resilient to climate change is a fundamental issue that has been incorporated into the proposed Local Plan. In terms of the considerations highlighted within SWWs previously submitted comments under the Regulation 18 consultation, the proposed plan incorporates measures both for managing/mitigating climate related changes to water consumption behaviours (Water efficiency standards, Urban Greening Factor, increasing tree canopy cover, etc.), and managing surface water sustainably and effectively. In terms of these highlighted material planning considerations, SWW advise the proposed Local Plan is sound.

SWW and the EA have published a joint statement on the need for development to secure increased water efficiency (<https://www.southwestwater.co.uk/siteassets/documents/environment/water-resources/evidence-for-increased-water-efficiency.pdf>). The inclusion of the 110 litres per person per day maximum average consumption requirement stated within draft Sustainability Appraisal is supported by SWW and is sound based on available and provided evidence.

Pursuant to National Water Industry targets for the reduction of spills to protect our environments, a significant pressure that can impede this work is the addition of surface water flows into the Undertaker's combined sewer system. The inclusion of the drainage hierarchy within in the draft Regulation 19 consultation is requested by SWW in supporting the sustainable and effective management of surface water from development.

The Site Allocations proposed within the chapters Development in Towns and Villages and Development at the West End of the proposed Local Plan have been modelled by SWW and have provided within its previous consultation response an assessment on initially identified reinforcement works necessary to accommodate each site identified. Further assessment will be required in due course as developments progress and details become available for evaluation.

4 (b). If no, please give details of why you consider this part of the East Devon Local Plan is unsound. Please be as precise as possible.

(Continue on a separate sheet if necessary)

N/a

4 (c). Please set out the modification(s) you consider necessary to make this part of the East Devon Local Plan sound, in respect of any soundness matters you have identified at 5(b) above. You will need to say why each modification will make this part of the East Devon Local Plan sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.
(Continue on a separate sheet if necessary)

N/a

5. Do you consider that this part of the East Devon Local Plan complies with the Duty to Co-operate?

Yes

No

5 (a). If yes, and you wish to support this part of the East Devon Local Plan's compliance with the duty to co-operate, please use this box to set out your comments.
(Continue on a separate sheet if necessary)

In terms of liaising and cooperating with the Statutory Water & Sewerage Undertaker on water and drainage material planning considerations, South West Water consider East Devon District Council to have fulfilled its Duty to Cooperate.

5 (b). If no, please give details of why you consider this part of the East Devon Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.
(Continue on a separate sheet if necessary)

N/a

Please note that non-compliance with the duty to co-operate is incapable of modification at examination.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

6. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

<p>No, I do not wish to participate in hearing session(s)</p> <input checked="" type="checkbox"/>	<p>Yes, I wish to participate in hearing session(s)</p> <input type="checkbox"/>
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Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:
(Continue on a separate sheet if necessary)

N/a

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

For more information on how we use your data – please read the privacy notices at the following links: <https://eastdevon.gov.uk/access-to-information/data-protection/privacy-notices/>, <https://www.commonplace.is/privacy-policy>

8. If you would like to make representations on the Sustainability Appraisal (SA) please provide your comments here, stating to which part of the SA your comments relate.
(Continue on a separate sheet if necessary)

Water Resources – South West Water (SWW) supports the water resources section of the SA as the information regarding SWW’s DWMP is accurate and supports the statement: - South West Water’s Water Resource Management Plan concludes that there is sufficient water supply up to the year 2045. It states that groundwater provides most of the water supply for East Devon. In line with the East Devon Abstraction Licensing Strategy and Water Abstraction Plan 2017, the increased demand for water supply and associated infrastructure requirements from new development should be considered.

As part of developing the DWMP & WRMP, SWW considered and factored in proposed levels of growth. SWW has now accepted OFWATs determination of the PR24 Business Plan, securing operational funding for the 2025 – 2030 period.

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.