

Filtered Data Export

**Full name:** Mr Simon Croft

**Organisation (where relevant):** South West Water

**Other party name (if relevant):**

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**Proposal:**

5. Development in the Towns and Villages

**1. To which part of the Development in the Towns and Villages chapter does your representation relate?:** Paragraph

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:**

5.1

**2(a). If yes, and you wish to support the legal compliance of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:**

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**3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?:** Yes

**3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:**

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.

**5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?:** No, I do not wish to participate in hearing session(s)

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**Proposal:**

7. Adapting to Climate Change

**1. To which part of the Adapting to Climate Change chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:**

7.1

**3. Do you consider that this part of the Adapting to Climate Change chapter is sound?:** Yes

**3(a). If yes, and you wish to support the soundness of this part of the Adapting to Climate Change chapter, please use this box to set out your comments.:** 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.

**4. Do you consider that this part of the Adapting to Climate Change chapter complies with the duty to cooperate?:** Yes

**4(a). If yes, and you wish to support this part of the Adapting to Climate Change chapter's compliance with the duty to co-operate, please use this box to set out your comments.:** 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. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?:** No, I do not wish to participate in hearing session(s)



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**Proposal:**

7. Adapting to Climate Change

**1. To which part of the Adapting to Climate Change chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** AR02

**3. Do you consider that this part of the Adapting to Climate Change chapter is sound?:** Yes

**3(a). If yes, and you wish to support the soundness of this part of the Adapting to Climate Change chapter, please use this box to set out your comments.:** 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

**3(b). If no, please give details of why you consider this part of the Adapting to Climate Change chapter is not sound. Please be as precise as possible.:**

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**5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?:** No, I do not wish to participate in hearing session(s)

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**Proposal:**

7. Adapting to Climate Change

**1. To which part of the Adapting to Climate Change chapter does your representation relate?:** Policy

**3(c). Please set out the modification(s) you consider necessary to make this part of the Adapting to Climate Change chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Adapting to Climate Change chapter 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.:** 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.

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**Proposal:** Sustainability appraisal

**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.:**

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.