



Clyst St Mary & Sowton (Bishops Clyst) Neighbourhood Plan (First Review)

Submission Version Representation Form

The modified Clyst St Mary & Sowton (Bishops Clyst) Neighbourhood Plan has been prepared by Bishops Clyst Parish Council.

It has been formally submitted to East Devon District Council who are legally required to undertake public consultation. The consultation closes at 9am on **17th March 2025**.

Please use this form to make representations (comments) on the Plan.

Using this form

Please use a separate form for each representation you wish to make and state your name or organisation on each page. Please note we cannot accept anonymous responses. Your name, address and your comments will be made publically available on our website. Other personal details (signature, personal email address and telephone number) will not be visible.

Return your completed form(s) and any additional information to East Devon District Council:

By email: planningpolicy@eastdevon.gov.uk

By post: Angela King, Planning Policy team, East Devon District Council, Blackdown House, Border Road, Heathpark Industrial Estate, Honiton, EX14 1EJ

To arrive not later than 9am 17th March 2025. Representations received after this may not be accepted.

Data Protection

Any personal information which you provide will be held and used by East Devon District Council for the purpose of producing the neighbourhood plan and may inform other Planning Policy work. Your information may also be shared within East Devon District Council for the purposes of carrying out our lawful functions. The content of your representation including your name and address will be recorded electronically and made available our website. Otherwise your personal information will not be disclosed to anybody outside East Devon District Council without your permission, unless there is a lawful reason to do so, for example disclosure is necessary for crime prevention or detection purposes. Your information will be held securely and will not be retained for any longer than is necessary. There are a number of rights available to you in relation to our use of your personal information, depending on the reason for processing. Further detail about our use of your personal information can be found in the [Neighbourhood Planning Representations Privacy Notice](#) on the data protection pages on our website.

Part A – Personal Details

Please enter your details as appropriate below. Please note your full name and address must be provided as a minimum. Please see page 1 for details on how we use your data.

Your Personal Details

Title:	Mr
First name:	Simon
Last name:	Croft
Job Title (where relevant):	Growth Planning Manager
Address:	South West Water, Peninsula House, Rydon Lane
Postcode:	EX2 7HR
Telephone number:	
Email address:	developmentevaluation@southwestwater.co.uk

Your Agent's Details

If you are using an agent, please fill in your title, name and organisation above and the full contact details of the agent below. Where applicable, an agent will be the point of contact for any correspondence.

Title:	
First name:	
Last name:	
Job Title (where relevant):	
Address:	
Postcode:	
Telephone number:	
Email address:	

Part B - Representation Details

Enter Your Name/Organisation in the box below (Please state this on each sheet):

South West Water

Question 1

To which section of the Neighbourhood Plan does this representation relate?

Please state in the box below, the point of reference for your representation (this means the policy, paragraph number or other reference as appropriate)

South West Water [SWWL] comment in response to the Regulation 16 Clyst St Mary and Sowton Draft Neighbourhood Plan Consultation acting in its function as Statutory Water and Sewerage Undertaker [the Undertaker] for East Devon. SWWL has a duty under the Water Industry Act 1991 (as amended) to provide an effective, efficient and economic water supply and sewerage system, as well as upgrade and improve infrastructure to accommodate development, where suitable. The Undertaker support the Clyst St Mary and Sowton Neighbourhood Planning Forum in relation to the objectives promoting flood resilience within the proposed draft policies.

Question 2

Please use the box below to explain why you are supporting or objecting to this part of the plan. If your comment relates to a specific area of land or site please identify it on a map if possible. Continue on a separate sheet if necessary.

Water Efficiency

The South West region has among the highest water consumption rates in the country, with significant shifts in average consumption behaviours exacerbated by sharp increases in consumption during peak tourism seasons. To further sustainable water consumption, the Undertaker would fully support Clyst St Mary and Sowton Neighbourhood Planning Forum in including water efficiency measures within draft policies, such as a requirement for all dwellings to achieve an estimated maximum water consumption of 110 litres/person/day; in line with Building Regulations Part G Optional Requirement G2. Such a policy would build upon Policies 3 & 38 of the East Devon Local Plan which consider sustainable construction and encourage the advancement of nationally set sustainability targets.

Similarly, SWWL would support the inclusion of a specified standard for water efficiency within this policy for proposals relating to non-residential development. An example policy imposing such a requirement can be found within the Draft Policy 96 of the Wiltshire Council Draft Local Plan (which underwent Regulation 19 consultation between September to November 2023). The wording proposed within this draft policy specifies the need for non-residential development to achieve a score of three credits within the Water (Wat 01 Water Consumption) issue category of the BREEAM New Construction Standard. Though primarily rural in character, implementing such policy will promote sustainability for a relevant development across the proposed plan period.

SWWL would support the inclusion of policy to encourage rainwater harvesting. [in line with/building on] adopted Strategic Policy 38 of the current East Devon Local Plan. Harvesting techniques, such as water butts, can help reduce strain on the water supply as this a tentative water source can be used for non-potable uses – including the likes of gardening uses – rather than relying on potable, treated drinking water from the public supply. SWWL would encourage the inclusion of specific policy wording requiring development proposals to incorporate water efficiency and reuse measures such as rainwater harvesting, subject to viability.

Sustainable Urban Drainage Systems (SuDs)

SWWL supports the inclusion of policy Bisc03 for the purpose of minimising flood risk and encouraging the inclusion of SuDs. With continuing trends of Climate Change resulting in hotter, drier summers and wetter, milder winters (IPCC, August 2021), impacts – like the threat of exacerbated drought and flood cycles – pose significant risk to our environments. During periods of drought the soil can become compacted, and when the rains arrive the soil cannot absorb the excess rainfall at a sufficient rate; increasing the volumes of surface water run-off, carrying soil and other surface particulates with it.

The implementation of natural SuDs within the proposed policy, creates increased opportunity for maximising the use of rainwater on land for a longer period than direct sewer disposal. The utility of infiltration techniques like swales, tree planters, rain gardens, ponds and wetlands can provide a broad range of benefits, including

- Enabling slow absorption prior to drought events of surface waters into the ground, allowing sufficient saturation into the soil substrata to provide greater drought resiliency;
- Enabling slow absorption, post drought events, of surface waters into the ground, promoting recovery of the moisture content of the soil.
- Reduction of surface water run-off, reducing sediment and other particulates entering sewers and surface water bodies.

Natural SuDs aim to mimic the way rainfall drains in the natural system to manage the quantity and quality of surface water runoff from developed sites, while also contributing to amenity and biodiversity. By enforcing the use of SuDs and rainwater harvesting techniques within all local development, the burden placed upon the existing drainage infrastructure can be limited, and potential betterment secured in combination with SWWL's ongoing initiatives. Slowing the rate of surface water runoff via water retention techniques supports the reduction of surface water ingress into the public sewerage network, as well as enabling development to maximise sustainability, biodiversity and water quality benefits.

SWWL would support Bishops Clyst parish in building on the requirements in the East Devon Local Plan and placing an increased requirement on development to incorporate rainwater harvesting measures and adhere to the surface water disposal hierarchy, the base standard of which being set within Planning Practice Guidance (Para ID 7-056-20220825). A good example of where policy incorporating this has been adopted can be found in the Sa ford Local Plan Policy W45 which states

"Surface water shall be managed in line with the following hierarchy (highest priority first) recognising that a combination of measures from different levels in the hierarchy may be required to satisfactorily deal with all surface water

1. Infiltration to vegetation
2. Store rainwater for later use on-site
3. Infiltration (into the ground)
4. Discharge to a surface water body such as a pond
5. Discharge to a watercourse
6. Discharge to a surface water sewer or highway drain

Only in exceptional circumstances, where evidence is provided that levels 1-6 above are not possible, discharge into the combined sewer network, either directly or indirectly"

Infrastructure Provision

As noted in the Draft Neighbourhood Plan (para 2.1, 4.18 & 6.1), ensuring suitable provision of infrastructure is critical in delivering sustainable development. SWWL support the inclusion of policy Bisc10 imposing a policy requirement for a I proposals to demonstrate how the infrastructure needs of development are addressed. Where such infrastructure capacity is not available within the Undertaker's network, a package sewage treatment plant can be considered (as advised in Planning Practice Guidance [PPG] Ref ID 34-020-20140306).

The Undertaker would support broadening the proposed wording of Policy Bisc10 to include reference to Statutory Undertaker Infrastructure (Energy, Digital, Water, Wastewater, etc.), which may not be suitable for the applicant to provision themselves but requires requisition of the relevant Undertaker. The Undertaker recommend such additional wording to emphasise a requirement of the applicant to submit confirmation of capacity of relevant Undertaker's to accommodate the proposed development.

"Where such provision must be delivered by a third party (i.e. Statutory Undertaker), the Applicant must provide suitable confirmation that either required capacity provision is available, or will be delivered within a suitable timeframe in conjunction with the proposed development (including suitable phasing, as needed)."

Such wording is in adherence to PPG Ref ID 34-020-20140306.

Drinking Water Assets

The level of development proposed by this Clyst St Mary and Sowton Draft Neighbourhood Plan can be accommodated within the existing water supply network and infrastructure. As the allocations progress, if it is determined that any network reinforcements are required, this would be funded through the Infrastructure Charge that SWWL receives from developers.

Wastewater Assets

To enable SWWL to support the level of development proposed by this Clyst St Mary and Sowton Draft Neighbourhood Plan will require work to be undertaken in the network to be able to suitably receive and accommodate the increase in flows expected as a result of

Enter Your Name/Organisation in the box below (Please state this on each sheet):

South West Water

Question 3

Please use the box below to say what changes you would suggest should be made to the plan?

It will be helpful if you are able to put forward your suggested revised wording of any policy or text or suggested alternative policy boundary as appropriate. Please be as precise as possible and continue on a separate sheet if necessary.

n/a

Enter Your Name/Organisation in the box below (Please state this on each sheet):

South West Water

Question 4

If your representation is seeking a change to the Plan, do you consider it necessary to speak at the examination?

Please note if you select 'No' your representation(s) will still be fully considered by the independent Planning Inspector by way of written representations.

Please select as appropriate:

- No, I do not wish to speak at the examination
- Yes, I wish to speak at the examination

If you have answered yes above and wish to speak at the examination, please outline in the box below why you consider this to be necessary:

n/a

Please note this will not be regarded as a binding decision but will help us in our planning of the examination. The Inspector will ultimately determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in the examination. If the Examiner does not consider it necessary to hold a public examination, consideration will be given by way of written representations.

Future Correspondence

Please indicate by selecting yes or no as appropriate, whether you wish to be notified of:

1. The publication of the recommendations of any person appointed to carry out an independent examination of the Bishops Clyst Neighbourhood Plan? Y N
2. The adoption of the Bishops Clyst Neighbourhood Plan? Y N

Enter Your Name/Organisation in the box below (Please state this on each sheet):

South West Water

Signature

Please sign and date your form in the box below.

Please note a signature is required by the Planning Inspectorate. If filling in the form electronically it can be an 'electronic signature' by typing in your name in the box. If you provide a handwritten signature we will ensure that it is not published on-line but it will be visible on the paper copies available at our offices and sent to the Inspector.

Signature:



Date:

14/03/2025