

Name or Organisation: Environment Agency

3. To which part of the Local Plan does this representation relate?

Paragraph Policy Policies Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4 (3) Complies with the Duty to co-operate	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

See EA letter dated 21 July 2021, ref SV/2018/110073/CS-04/SB1-L02, last section of letter entitled “Water Resources – “Serious Water Stress”” for details.

Essentially, we consider Defra’s recent (July 2021) designation of Severn Trent Water’s geographical area as being in “Serious Water Stress” now provides support and evidence to require higher/tighter standards of water efficiency in Local Plan policy. Accordingly we seek alterations to policy ES4 and/or supporting text. We have indicated to the Council we would be supportive of dealing with this matter, through discussions, as a Minor Modification, but that if this is considered to be a more significant change to policy then we would register this as a soundness objection. This would be on the basis that without appropriate water efficiency standards the Plan is not **justified** by a robust evidence base, and not **effective** in delivering sustainable development.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

See EA letter dated 21 July 2021, ref SV/2018/110073/CS-04/SB1-L02, last section of letter entitled “Water Resources – “Serious Water Stress”” for details.

(Continue on a separate sheet /expand box if necessary)

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.

7. 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)

Yes, I wish to participate in hearing session(s)

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.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

We have ticked 'no' above as we anticipate we will be able to resolve and agree modifications in discussion with the Council prior to the Examination/hearing sessions, and arrive at a Statement of Common Ground.

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.

9. Signature:

redacted

Date:

21/7/21