

Statement of Common Ground between the South Worcestershire Councils (Malvern Hills District Council, Wychavon District Council and Worcester City Council) and Severn Trent

Date: March 2024



1. Introduction

1.1 In accordance with the NPPF (paragraph 24)¹, public bodies have a duty to cooperate on planning issues that cross administrative boundaries, particularly those which relate to the strategic priorities set out above. This forms part of each local planning authority's evidence for their respective emerging Local Plans.

1.2 This SoCG has been prepared to fulfil the duty to cooperate requirements in accordance with paragraph 27 of the NPPF² and the section of the Planning Practice Guidance on Maintaining Effective Cooperation.

2. Purpose

2.1. This Statement of Common Ground (SoCG) has been produced to support the South Worcestershire Development Plan Review (SWDPR), which has been jointly prepared by the South Worcestershire Councils (SWCs) - Malvern Hills District Council, Wychavon District Council and Worcester City Council. It sets out how the SWCs have engaged with Severn Trent, the relevant water infrastructure supplier, in order to fulfil its Duty to Cooperate requirements.

3. Scope

3.1. Planning Practice Guidance (PPG)³ provides details on the scope of a Statement of Common Ground (SoCG), which is detailed below.

- a short description and map of the administrative areas covered by the statement;
- the key strategic matters being addressed by the statement;
- the plan-making authorities responsible for joint working detailed in the statement, and list of any additional signatories;
- governance arrangements for the cooperation process;
- if applicable, the housing requirements in any adopted and (if known) emerging strategic policies relevant to housing within the area covered by the statement;
- distribution of needs in the area as agreed through the plan-making process, or the process for agreeing the distribution of need (including unmet need) across the area;
- a record of where agreements have (or have not) been reached on key strategic matters, including the process for reaching agreements on these; and

¹ *Local planning authorities and county councils (in two-tier areas) are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries (NPPF, 2023, Para 24)*

² *In order to demonstrate effective and on-going joint working, strategic policymaking authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these. These should be produced using the approach set out in national planning guidance, and be made publicly available throughout the plan-making process to provide transparency” (NPPF, 2023, Para 27)*

³ Paragraph: 011 Reference ID: 61-011-20190315 (PPG, 2019)

- any additional strategic matters to be addressed by the statement which have not already been addressed.

3.2 The PPG also recognises that the *'level of cooperation detailed in the statement is expected to be proportionate to the matters being addressed. The statement is expected to be concise and is not intended to document every occasion that strategic policy-making authorities meet, consult with each other, or for example, contact prescribed bodies under the duty to cooperate. The statement is a means of detailing key information, providing clear signposting or links to available evidence on authorities' websites.'*⁴⁴

4. Relevant Local Authorities, Public Bodies, and Geography

- 4.1. The relevant Local Authorities and Public Bodies to this SoCG are the SWCs (Malvern Hills District Council, Wychavon District Council and Worcester City Council) and Severn Trent.
- 4.2. Severn Trent are the water infrastructure supplier which cover the whole area of the South Worcestershire Councils.
- 4.3. The administrative areas of Malvern Hills District Council, Wychavon District Council and Worcester City Council are located in Worcestershire County.
- 4.4. The map below illustrates the location of the South Worcestershire Councils:

⁴⁴ Paragraph: 011 Reference ID: 61-011-20190315, (PPG, 2019)

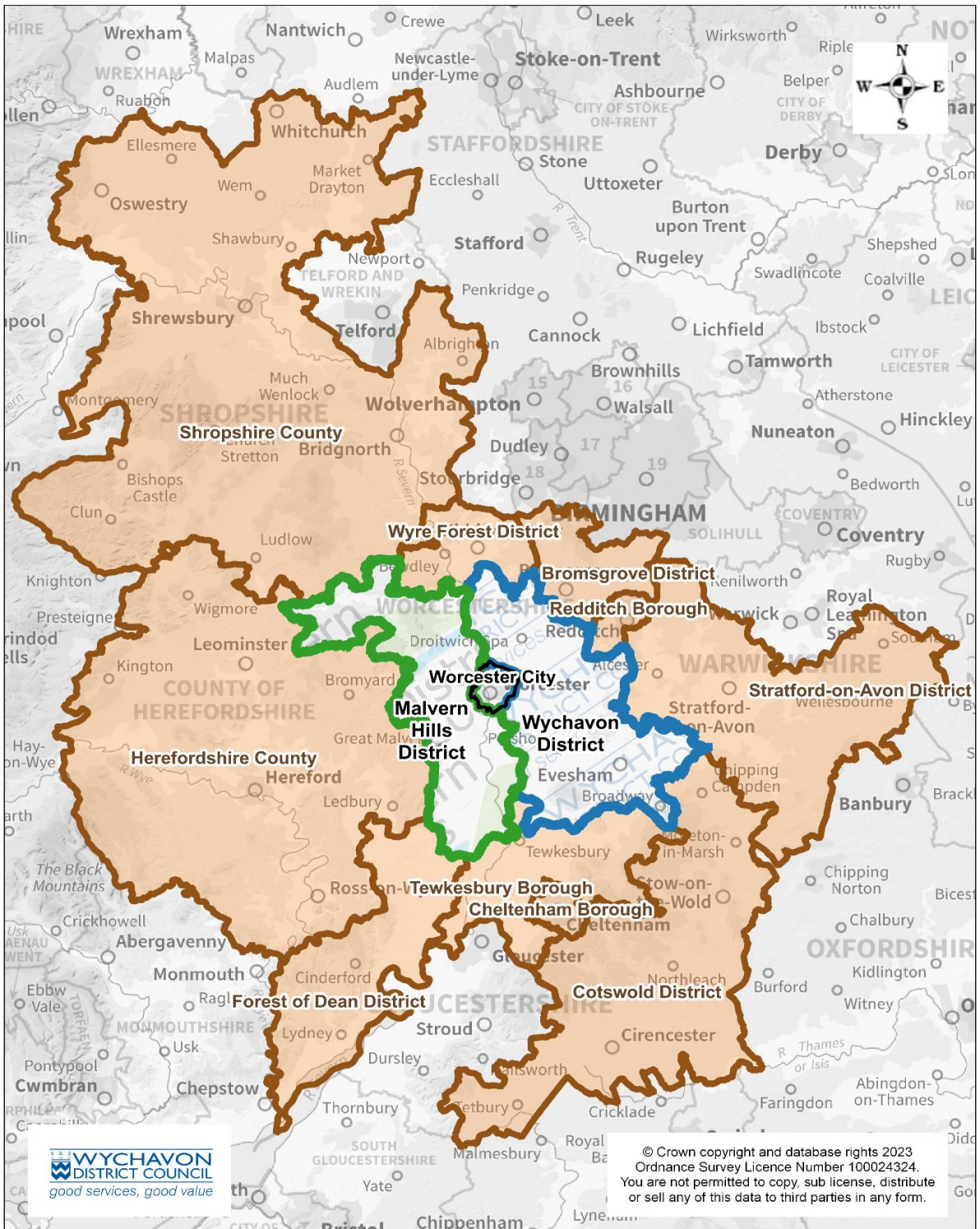


Figure 1 Map of SWCs and Neighbouring Authorities

5. Duty to Cooperate

South Worcestershire Development Plan Review

- 5.1. The Development Plan for the SWC currently comprises the South Worcestershire Development Plan (SWDP, adopted 2016), Minerals Local Plan (2022), Worcestershire Waste Core Strategy (2012), together with made Neighbourhood Development Plans. The SWDP was prepared jointly by the three SWCs working together under plan making arrangements. On completion of the SWDP Review process, the SWDP will be replaced by the 'South Worcestershire Development Plan Review, 2021-2041' (SWDPR).
- 5.2. The SWDPR includes strategic and detailed policies, together with site allocations for the Plan period 2021 to 2041.
- 5.3. Of particular relevance to this statement between SWC and Severn Trent is section 5 of the SWDPR regarding Climate Change and Resource Management. This contains policies SWDPR 34: Management of Flood Risk, SWDPR 35: Sustainable Drainage Systems, and SWDPR 36: Water Resources, Efficiency and Wastewater Treatment. Additionally, section 8 allocations, in particular regarding strategic sites, is important to SWC and Severn Trent regarding the delivery of effective water supply and disposal infrastructure within the plan period.
- 5.4. There has been ongoing and active engagement between the SWCs and Severn Trent throughout the SWDPR process and Duty to Cooperate discussions have occurred at appropriate times during the SWDPR process.
- 5.5. SWC consulted with Severn Trent Water in the preparation and publication of the Water Cycle Study phase 1 (2019, reference CCRM1) and phase 2 (2021, CCRM7). The study assessed the potential issues relating to future development within South Worcestershire and the impacts on water supply, wastewater collection and wastewater treatment.
- 5.6. SWC additionally consulted with Severn Trent Water on the Level 1 (2019, CCRM9) and Level 2 (2021, CCRM15) of the Strategic Flood Risk Assessment. This assessment was to inform the SWDPR by assessing flood risk from all sources and to identify which locations are the most and least vulnerable to flooding from all relevant sources. Both documents form part of the evidence bases for the SWDPR.
- 5.7. In October 2023 Severn Trent submitted the [PR24 Business Plan](#) for the regulatory period 2025-2030 to Ofwat. The plan includes £12.9 billion of total expenditure across Severn Trent's network, including £5.0 billion of investment focused on enhancing capacity and service beyond current level. This will be an important document for further cooperation between SWC and Severn Trent, particularly regarding the strategic sites within the SWDPR.
- 5.8. As part of the development of the SWDPR the SWCs have consulted Severn Trent during the following dates:
 - Introductory Meeting between SWC and Rebecca Mclean, Severn Trent Water, regarding the SWDPR, August 2018.

- Water Management Task Group Meeting, 7th October 2020.
- Foul Drainage Task Group Meeting, 2nd November 2020.
- SWDPR Issues and Options - consultation concluded on 17 December 2018.
- SWDPR Preferred Options - consultation concluded on 16 December 2019.
- SWDPR Regulation 19 – consultation concluded on 23 December 2022.
- SoCG meeting 10th January 2024

5.9. Main issues raised at regulation 18 consultation:

- SWC agreed to Severn Trent comments regarding large sites and the need for joined up approach, by adding the sentence *'early contact with Severn Trent Water Ltd is recommended to discuss proposed foul and surface water drainage strategies'* within policies SWDPR 34.
- Severn Trent commented on policy SWDPR 53 Rushwick expanded settlement that this is a large development and there are known flooding risks in the downstream network, it is recommended that a clearer development boundary of this site be provided and any information on site layout and trajectories be provided to enable us to plan effectively. Detailed hydraulic modelling of this site is also recommended. Since the Preferred Options the SWCs have been liaising with Severn Trent, the local Flooding Authority (Worcestershire County Council) as well as the Environment Agency to ensure that development at Rushwick does not worsen any flooding and pollution risks in the downstream network. A Sewer Capacity Assessment (more detailed hydraulic modelling) was undertaken by Severn Trent in September 2021 assessing the potential impact of 1000dw which concluded that with the expected connection locations at the time of assessment that flooding risk was low.
- Seven Trent identified several sites at being a medium or high-risk impact on the sewage network. SWC confirmed that this will be managed within the water management policies notably SWDPR 33 and SWDPR 34 and will be achieved through the development management process; contact with Severn Trent Water at the earliest opportunity is a requirement as part of development. The SWC were aware of drainage and water management issues and subsequently sites SWDP NEW 43 and SWDP NEW 44 allocations were removed from the process.

5.10 The Duty to Cooperate discussions will continue at appropriate times as the SWDPR progresses.

6. Key Strategic Matters

6.1. The following key issues have been identified in the Duty to Cooperate dialogue and consultation between SWC and Severn Trent. As part of the examination process, and in response to the IQ/and in order to resolve outstanding issues in this emerging SoCG, modifications will be put to the Inspectors within this SoCG for them to have regard to in their consideration of the Plan and whether modifications are necessary to make the plan sound, or not; or whether they are required for the purposes of updating the Plan since the Regulation 19 stage or for clarification purposes.

6.2. As a water company Severn Trent have an obligation to provide potable water supplies and sewage treatment capacity for future development. It is important to work collaboratively with Local Planning Authorities to provide relevant assessments on the impacts of future developments and to provide advice regarding policy wording on other relevant areas such as water efficiency, Sustainable Drainage Systems (SuDS), biodiversity, and blue green infrastructure. Severn Trent have made detailed responses for the SWDPR policies, these are outline below along with the SWC's responses-

6.3. SWDPR 01- Climate Change Mitigation and Adaptation.

Severn Trent is particularly supportive of sections iv, xii, xiii, and xiv of the policy. Section v is also supported. Severn Trent encourages SWC to include the following text so that protection does not rule out the potential to utilise green spaces for flood risk management purposes:

'Green Open Spaces Policy:

Development of flood resilience schemes within local green spaces will be supported provided the schemes do not adversely impact the primary function of the green space.

Supporting Text: We understand the need for protecting Green Spaces, however open spaces can provide suitable locations for schemes such as flood alleviation schemes to be delivered without adversely impacting on the primary function of the open space. If the correct scheme is chosen, the flood alleviation schemes can result in additional benefits to the local green space through biodiversity and amenity benefits.'

SWC note the comments made by Severn Trent and suggest including the following text (highlighted in bold) partially within section v, of the policy and additionally within the reasoned justification of the policy.

C. To ensure that development contributes to the mitigation of, and adaption to climate change, development proposals will be required to:

*V. Protect and safeguard existing green spaces and provide opportunities for community self-sufficiency e.g., through the provision of allotments, community orchards, etc (See SWDPR 45). **Development of flood resilience schemes within local green spaces will be supported provided the schemes do not adversely impact the primary function of the green space.***

Within the reasoned justification-

1.12 South Worcestershire Council understand the need for protecting Green Spaces, however open spaces can provide suitable locations for schemes such as flood alleviation schemes to be delivered without adversely impacting on the primary function of the open space. If the correct scheme is chosen, the flood alleviation schemes can result in additional benefits to the local green space through biodiversity and amenity benefits.'

6.4 SWDPR 05- Design and Sustainable Construction.

Severn Trent is supportive of this policy, particularly part viii. Severn Trent recommend that the policy wording is to go further to include the water efficiency target of 110 litres per day. The following wording is proposed-

'Water Efficiency Policy. New developments should demonstrate that they are water efficient, incorporating water efficiency and re-use measures and that the estimated consumption of wholesome water per dwelling is calculated in accordance with the methodology in the water efficiency calculator, not exceeding 110 litres/person/day. This need for lower water consumption standards for new developments is supported by Government. In December 2018, the Government stated the need to a reduction in Per Capita Consumption (PCC) and issued a call for evidence on future PCC targets in January 2019, with an intention of setting a long-term national target. The National Infrastructure Commission (NIC) has already presented a report including recommendations for an average PCC of 118 l/p/d. In Wales, the 110 l/p/d design standard was made mandatory in November 2018. In 2021 the Environment Agency classed the Severn Trent region as Seriously Water Stressed.

We recommend that all new developments consider:

- *Single flush siphon toilet cistern and those with a flush volume of 4 litres.*
- *Showers designed to operate efficiently and with a maximum flow rate of 8 litres per minute.*
- *Hand wash basin taps with low flow rates of 4 litres per minute or less.*
- *Water butts for external use in properties with gardens.*

SWC note the support of Severn Trent on this policy. SWC accept the suggested modifications by Severn Trent for this policy. It is noted that the 110 litre requirement is within several adopted local plans within the Severn Trent catchment area including [Warwick](#) and [Wyre Forest](#). It is proposed to include the 110-litre requirement within the policy, with the additional text to be included within the reasoned justification-

Design and Sustainable Constructure policy

B. All new development should mitigate the impacts of climate change through sustainable approaches to design and construction, so development proposals are required to:

xii. New developments should demonstrate that they are water efficient, incorporating water efficiency and re-use measures and that the estimated consumption of wholesome water per dwelling is calculated in accordance with the methodology in the water efficiency calculator, not exceeding 110 litres/person/day. It is recommended that all new developments consider:

- ***Single flush siphon toilet cistern and those with a flush volume of 4 litres.***
- ***Showers designed to operate efficiently and with a maximum flow rate of 8 litres per minute.***
- ***Hand wash basin taps with low flow rates of 4 litres per minute or less.***

- **Water butts for external use in properties with gardens.**

Additional paragraph within the reasoned justification for SWDPR 05-

5.8 The need for lower water consumption standards for new developments is supported by the Government. In December 2018, the Government stated the need to a reduction in Per Capita Consumption (PCC) and issued a call for evidence on future PCC targets in January 2019, with an intention of setting a long-term national target. The National Infrastructure Commission (NIC) has presented a report including recommendations for an average PCC of 118 l/p/d. In 2021 the Environment Agency classed the Severn Trent region as Seriously Water Stressed.

6.5 SWDPR34-Management of Flood Risk

Severn Trent is supportive of this policy, particularly sections Bvi and Cxi. It is recommended for section H of policy to be specific that foul drainage is included within the drainage master and phasing plans. Regarding section J 2) it is encouraged to go further by including wording that emphasises that betterment may also include removing existing connections of service water to the combined sewerage system.

Severn Trent recommend that the following policy wording is also included in the SWDPR plan to ensure that surface water discharges are connected in accordance with the drainage hierarchy: *'Drainage Hierarchy Policy New developments shall demonstrate that all surface water discharges have been carried out in accordance with the principles laid out within the drainage hierarchy, whereby a discharge to the public sewerage system is avoided where possible.'*

SWC note the comments from Severn Trent and agree to modifications within section H and J2 of the policy. SWC believe that the second point raised by Severn Trent is already addressed within section Vi. of the policy- *'All applications for new development shall demonstrate that all surface water discharges have been carried out in accordance with the principles laid out within the drainage hierarchy, in such that a discharge to the public sewerage systems is avoided, where possible. Early contact with Severn Trent Water Ltd is recommended to discuss proposed foul and surface water drainage strategies.'*

SWC propose to amend section H of the policy-

*H. The provision of drainage **and foul drainage** during the building phase shall be based on the Drainage Phasing Plan to ensure adequate drainage is provided and implemented throughout the development life.*

And within the section J.2 Requirements for Development-

J2. Seek to provide wider betterment by demonstrating what measures can be put in place to contribute to a reduction in flood risk downstream in site-specific Flood Risk Assessments and Surface Water Drainage Strategies. This may either be by provision of additional storage on site e.g., through SuDS, natural flood management

*techniques, green infrastructure and green-blue corridors and/or by providing a Partnership Funding contribution towards any flood alleviation schemes. **Betterment may also include removing existing connections of service water to the combined sewage system.** Consultation on the site-specific requirements should be undertaken with the LPA and the Environment Agency at the earliest opportunity.*

6.6 SWDPR 35-Sustainable Drainage Systems.

As a water company Severn Trent have an obligation to provide water supplies and sewage treatment capacity for future development. It is important for Severn Trent to work collaboratively with Local Planning Authorities to provide relevant assessments on the impacts of future developments and to provide advice regarding policy wording on other relevant areas infrastructure.

Severn Trent is supportive of this policy particularly sections ii) regarding greenfield runoff, and iv) regarding consultation with Severn Trent. Severn Trent have indicated an error of including a repetition of section ii) within section iii). Severn Trent have set out some general guidelines and relevant policy wording to SWC that may be useful:

Sustainable Drainage Systems

“Sustainable Drainage Systems (SuDS) represent the most effective way of managing surface water flows whilst being adaptable to the impact of climate change and providing wider benefits around water quality, biodiversity, and amenity.”

Severn Trent therefore recommend that the following policy wording is included within the SWDPR regarding SuDS: Sustainable Drainage Systems (SuDS) Policy- All major developments shall ensure that Sustainable Drainage Systems (SuDS) for the management of surface water run-off are included, unless proved to be inappropriate.

All schemes with the inclusion of SuDS should demonstrate they have considered all four areas of good SuDS design: quantity, quality, amenity, and biodiversity. Completed SuDS schemes should be accompanied by a maintenance schedule detailing maintenance boundaries, responsible parties and arrangements to ensure the SuDS are managed in perpetuity.

Supporting Text to be added to SWDPR 35: Sustainable Drainage Systems (SuDS) should be designed in accordance with current industry best practice, The SuDS Manual, CIRIA (C753), to ensure that the systems deliver both the surface water quantity and the wider benefits, without significantly increasing costs. Good SuDS design can be key for creating a strong sense of place and pride in the community for where they live, work and visit, making the surface water management features as much a part of the development as the buildings and roads.

Some general guidelines and relevant policy wording that may be useful to SWC-

Any new developments need to ensure that the Environment Agency's Source Protection Zones (SPZ) and Safeguarding Zone policies which have been adopted by Natural Resources Wales are adhered to. Any proposals should take into account the principles of the Water Framework Directive and River Basin Management Plan as prepared by the Environment Agency.

Every five years Severn Trent produce a Water Resources Management Plan (WRMP) which focuses on how we plan to ensure there is sufficient supply of water to meet the needs of customers whilst protecting our environment over the next 25 years. Severn Trent use housing target data from Local Planning Authorities to plan according to the projected growth rates. New development results in the need for an increase in the amount of water that needs to be supplied across our region. Severn Trent are committed to doing the right thing and finding new sustainable sources of water, along with removing unsustainable abstractions, reducing leakage from the network and encouraging the uptake of water meters to promote a change in water usage to reduce demand.

SWC note the comments made by Severn Trent and acknowledge the repetition in the document. This has now been removed as a modification within the text. SWC welcome the additional guidance from Severn Trent, but this has not been included within the policy for brevity. SWC agree on the additional text regarding SuDS within policy SWDPR 35, and within the reasoned justification-

A. To minimise flood risk, improve water quality and groundwater recharge, and enhance biodiversity and amenity interest, all development proposals (as appropriate to their nature and scale) will be required to:

i. Demonstrate, through a Water Management Statement, that site drainage and run off will be managed in a sustainable and co-ordinated way that mimics the natural drainage network using multiple features. The statement should show how the four pillars of Sustainable Drainage

Systems (SuDS) are met by the scheme:

- 1. To manage the quality of the run-off;*
- 2. To control the quantity and rate of run off from a development;*
- 3. To provide an amenity benefit, to create and sustain better places for people; and*
- 4. To provide a biodiversity benefit to create and sustain better places for nature.*

ii. Manage surface water through SuDS - this must be considered at the earliest possible enhancement of biodiversity in the local and wider area where practicable.

iii. Provide a Surface Water Drainage Strategy for all major developments (see policy SWDPR 34 Management of Flood Risk). For the new / expanded settlements, this must take account of the whole proposed development, assessing the overall impact of the development on the aquatic environment, in terms of Quantity, Quality, Biodiversity and

Amenity, identifying potential degradation and measures to prevent or mitigate degradation. Individual developments within a Strategic Site will be required to demonstrate that surface water discharges are managed in accordance with the Surface Water Drainage Strategy.

iv. All major developments shall ensure that Sustainable Drainage Systems (SuDS) for the management of surface water run-off are included, unless proved to be inappropriate.

Reasoned Justification for SWDPR 35-

4.8 Sustainable Drainage Systems (SuDS) should be designed in accordance with current industry best practice, [The SuDS Manual, CIRIA \(C753\) \(or most up to date guidance\)](#), to ensure that the systems deliver both the surface water quantity and the wider benefits, without significantly increasing costs. Good SuDS design can be key for creating a strong sense of place and pride in the community for where they live, work and visit, making the surface water management features as much a part of the development as the buildings and roads.

6.7 SWDPR 36- Water Resources, Efficiency and Wastewater treatment.

Severn Trent is supportive of sections A and C of the policy. Section B is unclear as if there is no mains drainage it is unlikely that there will be a surface water or combined sewer available for the development to discharge into. It should be considered that this is reworded to consider whether the Environment Agency will provide the licence for private treatment or the need to consider potentially long distances of new sewer to be laid at the developer's cost to the nearest public sewer network.

Within section 5.7, the reasoned justification discusses the results of the WCS in identifying several Wastewater Treatment Works where 'Good Ecological Status' cannot be achieved due to current technology limits and that developers should therefore use natural flood management to avoid a deterioration in status. This statement is fundamentally untrue and is strongly recommend that it is removed.

Regarding wastewater strategy Severn Trent have a duty to provide capacity for new development in the sewerage network at Wastewater Treatment works. Proposed additional wording to be included for the optional high water efficiency standard- 'New developments should demonstrate that they are water efficient, incorporating water efficiency and re-use measures and that the estimated consumption of wholesome water per dwelling is calculated in accordance with the methodology in the water efficiency calculator, not exceeding 110 litres/person/day'.

Regarding Water Supply, for the majority of new developments, Severn Trent does not anticipate issues connecting new development, particularly within urban areas of the water supply network. When specific detail of planned development location and sizes are available a site-specific assessment of the capacity of our water supply network could be made. Any assessment will involve carrying out a network analysis exercise to investigate any potential impacts. If significant development in rural

areas is planned, this is more likely to have an impact and require network reinforcements to accommodate greater demands.

SWC note the support of Severn Trent on section A and C of this policy. SWC agree to the proposed modification for part B of the policy and to remove paragraph 5.7 within the reasoned justification, as outlined below. Regarding the water efficient comment from Severn Trent, SWC have already agreed to include the 110 litres per day requirement for new developments within policy SWDPR 05, and therefore do not feel the need for this to be repeated in this policy, the South Worcestershire Development Plan should be read as a whole, and therefore the requirement should be taken into account.

B. Development proposals in areas where there is no mains foul drainage provision will be required to apply the hierarchy of drainage options set out in the National Planning Practice Guidance and evidence to the satisfaction of the relevant LPA why those at the top of the hierarchy cannot be achieved. ***need to consider if whether the Environmental Agency will provide the licence for private treatment of drainage or the need to consider potentially long distances of new sewer to be laid at the developer's cost to the nearest public sewage network.***

Deleted paragraph within reasoned justification for SWPR 36-

~~5.7 The WCS also demonstrated that at 11 Wastewater Treatment Works (WwTw's) – Blackminster, Broadway, Clifton-upon-Teme, Harvington, Honeybourne, Inkberrow, Kidderminster Oldington, Ridgeway, Stoke Prior, Stoulton / Hawbridge and Tewkesbury, 'Good Ecological Status' cannot be achieved due to current technology limits. Developers must demonstrate, through the use of natural flood management techniques (see Policy SWDPR 35) that development in proximity to these affected works will not cause a deterioration in 'Good Ecological Status'.~~

6.8 SWDPR 51- Worcestershire Parkway.

Severn Trent is supportive of section vii) 4 relating to a comprehensive site-wide drainage strategy to manage all water drainage. It should be specified that this includes foul water drainage which should be agreed with Severn Trent. Severn Trent is supportive of viii) 6 relating to managing surface water in line with the drainage hierarchy and xv) regarding upgrading wastewater treatment works in accordance with Severn Trent requirements and timescales. Severn Trent are also supportive of section G relating to necessary infrastructure; however, it should be emphasised that provision of regular updates on development timescales and trajectories are vital to ensure that timing of improvements is in line with the development.

SWC welcome Severn Trent supporting this policy. Concerns have been raised by the local community regarding whether there is any existing foul capacity for Worcestershire Parkway, and at what stage new foul drainage infrastructure will be required. Concerns have also been raised about the existing low pressure of potable water and whether the new development will reduce the pressure further.

Severn Trent has acknowledged these concerns and is currently collaborating with SWC and developers to ensure that there is a phased approach that will support the new development and mitigate any impact on existing residents. Severn Trent is currently undertaking modelling of the Worcestershire Parkway site in terms of the water resources and anticipates that there are sufficient existing and planned water resources across the region to accommodate this increase in growth. The extent of strategic network upgrades to supply this water will not be fully understood until detailed modelling is undertaken. The distribution network will require expanding into the greenfield area⁵.

6.9 SWDPR 53- Rushwick Expanded Settlement. Severn Trent is supportive of section ix) 3 relating to management of surface water drainage. SWC welcome Severn Trent supporting this policy.

6.10 It is considered that the Duty to Cooperate process has been progressed in a positive and progressive manner by both bodies. Whilst this SoCG identifies outstanding areas where there remains some disagreement between the Parties, it is considered this does not represent a failure of the Duty to Cooperate process, but instead are issues which can be discussed through the Examination into the South Worcestershire Development Plan if considered necessary.

7 Matters of Agreement

7.1 Both parties agree the following points through this Statement of Common Ground:

7.2 All the above matters are agreed between the SWC's (Malvern Hills District Council, Wychavon District Council and Worcester City Council) and Severn Trent.

7.3 Severn Trent and SWC have worked closely together in the preparation of the Water Cycle Study and Strategic Flood Risk Assessment, and both parties are content with the methodology used in both studies which forms part of the evidence base of the SWDPR.

7.4 SWC welcome the comments made by Severn Trent at the regulation 19 consultation stage. SWC note the overall support from Severn Trent for SWDPR policies 01, 51, and 53. SWC note the comments from Severn Trent for SWDRPR policies 01, 05, 34,35, and 36 and have agreed to modifications within these policies, of which some may be considered in greater detail by the Inspector at the Local Plan Examination.

8 Matters of Disagreement

⁵ [2022.09.01 SWC Worcestershire Parkway IDP Final \(swdevelopmentplan.org\)](https://www.swdevelopmentplan.org) P 50

8.1 SWC have responded to all comments from Severn Trent representations from the regulation 19 stage consultation. SWC have agreed to several proposed modifications for policies and corresponding reasoned justification from Severn Trent and believe that there are no significant matters of disagreement.

9 Governance Arrangements

9.1 Governance arrangements are key to ensure that effective duty to cooperate discussions are undertaken and an appropriate SoCG prepared.

9.2 The SoCG will be updated as appropriate to reflect ongoing duty to cooperate discussions between SWC and Severn Trent.



10 Conclusions

10.1 The parties agree that:

- i) The South Worcestershire Councils (Malvern Hills District Council, Wychavon District Council and Worcester City Council) have fulfilled their Duty to Cooperate with Severn Trent.
- ii) The parties will continue to work positively together and where relevant with other prescribed bodies on strategic cross boundary issues.

11 Signatories

11.1 This SoCG has been agreed and signed by the following:

South Worcestershire Councils	SEVERN TRENT
Name: Ian Macleod	Name: Rebecca Mclean
Position: Director of Planning and Infrastructure, Malvern Hills District Council and Wychavon District Council	Position: Strategic Catchment Planner
Date agreed: 13/03/2024	Date agreed: 05/03/2024
Signature: 	Signature: 

And,

Name: Duncan Rudge

Position: Head of Planning, Worcester
City Council

Date agreed: 11/03/2024

Signature:

