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By email only: LDF@highpeak.gov.uk

High Peak Borough Council
Planning Policy
Town Hall
Buxton
Derbyshire
SK17 6EL

Your ref:

Our ref:

Date: 22-JUN -23

Dear Sir / Madam

HIGH PEAK BOROUGH COUNCIL – WHALEY BRIDGE NEIGHBOURHOOD PLAN

Thank you for your consultation seeking the views of United Utilities Water Limited (UUV) as part of the Neighbourhood Plan (NP) for Whaley Bridge. UUV wishes to build a strong partnership with neighbourhood groups to aid sustainable development and growth.

Allocations for New Development

Following our review of the NP, we note that there are no site-specific allocations for new development above and beyond those already identified in the wider development plan for High Peak. If this were to change, we would request early dialogue so that we can inform the site selection process and ensure any issues that are a concern to us are highlighted to you as early as possible.

Our Assets

It is important to outline the need for our assets to be fully considered in any proposals in the NP Area.

UUV will not allow building over or in close proximity to a water main.

UUV will not allow a new building to be erected over or in close proximity to a public sewer or any other wastewater pipeline. This will only be reviewed in exceptional circumstances.

Site promoters should not assume that our assets can be diverted.

On occasion, an asset protection matter within a site can preclude delivery of a proposed development. It is critical that site promoters / applicants engage with UUV on the detail of their design and the proposed construction works.

All UUW assets will need to be afforded due regard in the masterplanning process for a site. This should include careful consideration of landscaping and biodiversity proposals in the vicinity of our assets and any changes in levels and proposed crossing points (access points and services).

We strongly recommend that the LPA advises future applicants / promoters of the importance of fully understanding site constraints as soon as possible, ideally before any land transaction is negotiated, so that the implications of our assets on development can be fully understood. We ask site promoters to contact UUW to understand any implications using the below details:

Developer Services – Wastewater Tel:
03456 723 723
Email: SewerAdoptions@uuplc.co.uk

Developer Services – Water Tel:
0345 072 6067
Email: DeveloperServicesWater@uuplc.co.uk

Environment and Climate Change

UUW notes the importance of climate change and the wider issues associated with the climate emergency that are outlined in the NP. A critical element of the response to climate change is sustainable surface water management and the efficient use of clean water supply. We wish to ensure that the NP gives appropriate emphasis to designing new development so that it is resilient to the challenges of future climate change, such as, multi-functional sustainable drainage, avoidance of flood risk, natural flood management techniques and the incorporation of water supply efficiency measures.

Policy WB-E1 Sustainable Design

UUW recommends the following additional wording as part of Policy WB-E1 Sustainable Design.

- *All new development should apply the surface water hierarchy and incorporate sustainable drainage which is multi-functional, in preference to underground piped and tanked storage systems, unless, there is clear evidence why such techniques are not possible.*
- *All new development should ensure landscaping proposals are integrated with the strategy for sustainable water management.'*

We also wish to suggest the following additional paragraphs to the Justification section of Policy WB-E1 Sustainable Design:

Sustainable surface water management and the efficient use of water are critical elements of the design and development process. Sustainable surface water management should be at the forefront of the design process and linked to green/blue infrastructure, landscape design and biodiversity. Green infrastructure can help to mitigate the impacts of high temperatures, combat emissions, maintain or enhance biodiversity and reduce flood risk. Green / blue infrastructure and landscape provision play an important role in managing water close to its source.

Water Efficiency

Building Regulations Part G includes an optional standard for water efficiency of 110 litres per person per day (l/p/day) for new residential development which can be implemented through local planning policy where there is a clear need based on evidence. In this regard, we have enclosed evidence prepared by Water Resources West to support the adoption of the Building Regulations optional requirement for local authorities in North West England and the Midlands. We therefore recommend the inclusion of the following additional wording in the emerging NP regarding water efficiency. This could be included as an additional criterion to Policy WB-E1 Sustainable Design or as a separate new policy:

'All new residential developments must achieve, as a minimum, the optional requirement set through Building Regulations Requirement G2: Water Efficiency or any future updates. All major non-residential development shall incorporate water efficiency measures so that predicted per capita consumption does not exceed the levels set out in the applicable BREEAM 'Excellent' standard. Where the 'Excellent' Standard cannot be achieved, evidence must be submitted with an application to the satisfaction of the local planning authority. The BREEAM 'Very Good' standard must be met as a minimum.'

We wish to highlight that improving water efficiency makes a valuable contribution to water reduction as well as carbon reduction noting that water and energy efficiency are linked. We also wish to note the associated societal benefits by helping to reduce customer bills.

Sustainable Drainage – Foul Water and Surface Water

In addition to the recommended changes to Policy WB-E1 Sustainable Design set out above, we recommend that the NP includes a comprehensive policy on foul and surface water management. This is because control over the management of surface water is a critical response to the challenge of climate change. Our example sustainable drainage policy is set out below and we recommend that you include this in your NP.

'Sustainable Drainage – Foul and Surface Water

All applications must be supported by a strategy for foul and surface water management. Surface water should be discharged in the following order of priority:

- i. An adequate soakaway or some other form of infiltration system.*
- ii. An attenuated discharge to a surface water body.*
- iii. An attenuated discharge to public surface water sewer, highway drain or another drainage system.*
- iv. An attenuated discharge to public combined sewer.*

Proposals should be designed to maximise the retention of surface water on-site and minimise the volume, and rate of, surface water discharge off-site. On greenfield sites, any rate of discharge shall be restricted to a greenfield run-off rate. On previously developed land, applicants must also follow the hierarchy for surface water management and target a reduction to a greenfield rate of run-off. Proposals on previously developed land must achieve a minimum reduction in the rate of surface water discharge of 30% rising to a minimum of 50% in any critical drainage area identified by the SFRA. To demonstrate any reduction, applicants must submit clear evidence of existing operational connections from the site with associated calculations on rates of discharge. Where clear evidence of existing connections is not provided, applicants will be required to discharge at a greenfield rate of run-off.

The design of proposals must assess and respond to the existing hydrological characteristics of a site to ensure a flood resilient design is achieved and water / flooding is not deflected or constricted.

Applications for major development will be required to incorporate sustainable drainage which is multi-functional, in accordance with the four pillars of sustainable drainage, in preference to underground piped and tanked storage systems, unless, there is clear evidence why such techniques are not possible. The sustainable drainage should be integrated with the landscaped environment and the strategy for biodiversity net gain.

For any development proposal which is part of a wider development / allocation, foul and surface water strategies must be part of a holistic site-wide strategy. Pumped drainage systems must be minimised and a proliferation of pumping stations on a phased development will not be acceptable.

Applications must be accompanied by drainage management and maintenance plans including a plan for any watercourse within the application site or an adjacent watercourse where the application site is afforded riparian rights.

Explanatory Text

Application of the hierarchy for managing surface water will be a key requirement for all development sites to reduce flood risk and the impact on the environment. Clear evidence must be submitted to demonstrate why alternative preferable options in the surface water hierarchy are not available.

Foul and surface water drainage must be considered early in the design process. Sustainable drainage should be integrated with the landscaped environment and designed in accordance with the four pillars of sustainable drainage (water quantity, water quality, amenity and biodiversity). It should identify SuDS opportunities, including retrofit SuDS opportunities, such as green roofs; permeable surfacing; soakaways; filter drainage; swales; bioretention tree pits; rain gardens; basins; ponds; reedbeds and wetlands. Any drainage should be designed in accordance with 'Ciria C753 The SuDS Manual', sewerage sector guidance, or any subsequent replacement guidance.

The hydrological assessment of the site must consider site topography, naturally occurring flow paths, ephemeral watercourses and any low lying areas where water naturally accumulates. Resultant layouts must take account of such circumstances. Applications will be required to consider exceedance / overland flow paths from existing and proposed drainage features and confirm ground levels, finished floor levels and drainage details. Drainage details, ground levels and finished floor levels are critical to ensure the proposal is resilient to flood risk and climate change. It is good practice to ensure the external levels fall away from the ground floor level of the proposed buildings (following any regrade), to allow for safe overland flow routes within the development and minimise any associated flood risk from overland flows. In addition, where the ground level of the site is below the ground level at the point where the drainage connects to the public sewer, care must be taken to ensure that the proposed development is not at an increased risk of sewer surcharge. It is good practice for the finished floor levels and manhole cover levels (including those that serve private drainage runs) to be higher than the manhole cover level at the point of connection to the receiving sewer.

Holistic site-wide drainage strategies will be required to ensure a coordinated approach to drainage between phases, between developers, and over a number of years of construction. Applicants must demonstrate how the approach to drainage on any phase of development has regard to interconnecting phases within a larger site with infrastructure sized to accommodate interconnecting phases. When necessary, the holistic drainage strategy must be updated to reflect any changing circumstances between each phase(s). The strategy shall demonstrate communication with infrastructure providers and outline how each phase interacts with other phases.

Flood Risk

We welcome the reference to flood risk on page 37. We request that this references all sources of flood risk in accordance with national planning policy and guidance.

In accordance with the definition of flood risk in the National Planning Practice Guidance and the need to ensure new development is resilient and responsive to the challenge of climate change, we continue to recommend the inclusion of the following wording relating to flood risk.

'The risk of flooding from any source must be considered. Applicants will be required to consult with the water and sewerage undertaker to confirm the nature and extent of any flood risk from sewers and reservoirs.'

For sewers, the consultation should confirm:

- a) if there are any sewer surcharge levels at the point of connection that could influence site design;*
- b) whether there is an incident of sewer flooding at, or in the vicinity of, the proposed development site; and*
- c) if sewer modelling data indicates that existing sewers that pass through or near to the site present a modelled risk of sewer flooding.*

This information will inform whether to apply the sequential approach. Development should not be located in an area at risk of flooding. Applicants must demonstrate that proposals do not increase flood risk and are safe. Applicants should not assume that changes in levels or that changes to the public sewer (including diversion), will be acceptable as such proposals could increase / displace flood risk.'

WB-E5 Local Green Space

We note that Policy WB-E5 identifies various locations designated as Local Green Space which include 'LGS15: Carr Field Horwich End, Buxton Road'. We welcome the additional paragraph in the interpretation text which acknowledges the operational function of this area and the potential need for work on such assets to maintain the operation of essential services. Whilst welcoming this wording, we request that this is amended as follows:

'It is noted that United Utilities own a small parcel of land in LGS15 Carr Field which has an operational function relating to the utility infrastructure. It is recognised that they may need to undertake work on ~~underground~~ utility infrastructure at and around the site in order to maintain and / or improve the operation of essential services.'

We request that a similar paragraph is inserted in respect of 'LGS4: Shallcross Wood' where the designated area of Local Green Space may also require investment in utility infrastructure. Our recommended wording at this site is:

'It is noted that United Utilities has utility infrastructure at and near to LGS4 Shallcross Wood which has an operational function. It is recognised that they may need to undertake work on utility infrastructure at and around the site in order to maintain and / or improve the operation of essential services.'

In accordance with our below comments on 'Supporting Utility Infrastructure', we request that the policy on Local Green Space includes some flexibility to reflect the fact that green spaces are often locations for underground utility infrastructure where works may need to take place in the future to maintain the operation of essential services

New Policy - Water Catchment Land

UW wishes to note that part of the Whaley Bridge NP area is located in public water supply catchment land. Development proposals on water catchment land can have an impact on water supply resources and therefore we recommend that you include a policy which identifies the need to engage with the statutory undertaker for water to determine whether any proposal is on land used for public water supply catchment purposes. Please get in touch for information on the location of catchment land in the area.

In cases of wind energy proposals on water catchment land the applicant should seek to locate development so that the impact on public water supply is minimised through the location of the development and through the undertaking of appropriate risk assessments and inclusion of mitigation measures in the design and construction process. It is particularly important to avoid the location of new wind turbines on deep peat land.

We recommend you include the following policy relating to water catchment land.

'Water Catchment Land

Development proposals on land used for public water supply catchment purposes will be required to consult with the relevant water undertaker. The first preference will be for proposals to be located away from land used for public water supply purposes. Where proposals are proposed on catchment land used for public water supply, careful consideration must be given to the location of the proposed development and a risk assessment of the impact on public water supply may be required with the identification and implementation of any required mitigation measures.'

For any site specific allocations that you may identify which fall in such locations, it will be important that adequate information is presented to justify the principle of the development in advance of allocation and that the proposal is covered by site-specific detail which clearly identifies this constraint and the need for proposals to be undertaken in accordance with the above recommended policy.

New Policy – Supporting Utility Infrastructure

UW wishes to highlight that it owns assets which are currently situated beyond the settlement boundary in an area of countryside and within the green belt. This includes Whaley Bridge Wastewater Treatment Works. Upgrades to such assets may be required in the near future, and it is important to ensure that any required upgrades and expansions to these sites can be made in order for us to meet the infrastructure requirements of proposed future development in the borough and future environmental drivers. UW requests support for any investment in our assets. It is therefore requested that a policy is included in the NP to recognise that investment in water and wastewater infrastructure, including infrastructure located outside the settlement boundary, is appropriate for development for operational infrastructure purposes. Our recommended wording is:

'The Council will support water and wastewater infrastructure investment which facilitates the delivery of wider sustainable development and the meeting of environmental objectives of water and sewerage undertakers including development proposals for water and wastewater infrastructure in protected areas such as the Green Belt, open countryside or in existing green spaces, where the investment is needed to respond to future growth and environmental needs.'

Goyt Estate

We wish to note that we own significant other land in the designated neighbourhood plan area. This includes part of the Goyt Estate. Our ownership of this estate is related to our water supply function.

Summary

If you have any queries or would like to discuss this representation, please do not hesitate to contact planning.liaison@uuplc.co.uk.

Yours faithfully

Ellie Rigby
Planning, Landscape and Ecology
United Utilities Water Limited

Enc. Water Resources West Evidence