



Developer Services &
Planning
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Your ref

Our ref

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Date

2 February 2017

Development Plans Manager
South Lakeland District Council
South Lakeland House
Lowther Street
Kendal
Cumbria
LA9 4DQ

By Email (developmentplans@southlakeland.gov.uk)

Dear Sir/Madam,

DRAFT LOCAL PLAN – DEVELOPMENT MANAGEMENT POLICIES;

**DRAFT PLAN CONSULTATION DOCUMENT – ARNSIDE & SILVERDALE
AREA OF OUTSTANDING NATURAL BEAUTY (AONB);**

Thank you for your consultation seeking the views of United Utilities as part of the planning process. United Utilities wishes to build a strong partnership with all Local Planning Authorities (LPAs) to aid sustainable development and growth within its area of operation. We aim to proactively identify future development needs and share our information. This helps:

- ensure a strong connection between development and infrastructure planning;
- deliver sound planning strategies; and
- inform our future infrastructure investment submissions for determination by our regulator.

When preparing future planning policies, we can most appropriately manage the impact of development on our infrastructure if development is identified in locations where infrastructure is available with existing capacity. It may be necessary to co-ordinate the delivery of development with the delivery of infrastructure in some circumstances.

(Continued...)

United Utilities wishes to highlight that we will seek to continue working closely with South Lakeland District Council to develop a coordinated approach for delivering sustainable growth in sustainable locations. New development should be focused in sustainable locations which are accessible to local services and infrastructure.

GENERAL COMMENTS

United Utilities is keen to continue working with South Lakeland District Council on technical matters relating to site-specific development, such as site drainage reflecting the principles set out within the Surface Water Hierarchy. We encourage consideration of the availability of alternatives to the public sewerage system for surface water discharges. For example, sites with land drains or near to watercourses are a more sustainable alternative to using the public sewer.

United Utilities has regular meetings with Planning Officers at the Council and will continue to work in partnership to support development and economic growth.

We wish to submit the following comments for consideration as part of the latest Draft consultations.

SPECIFIC COMMENTS

The principles set out within the draft documents reflect the level of communication between the Council and United Utilities, however we provide further comments on specific elements below.

Draft Local Plan – Development Management Policies

Policy DM1 – General Requirements for all development

United Utilities supports the principles set out within this policy, particularly point 4 which highlights the need for foul and surface water to be disposed of in a sustainable and viable manner. We suggest the following additional sentence (shown in red) is added to this criterion.

4. ensure the delivery of necessary infrastructure needs it may generate for example surface and foul water disposal, water supply, and other utilities in a sustainable and viable manner. *As more information on development proposals becomes available, it may be necessary to co-ordinate the timing for the delivery of development with the timing for delivery of new or improved infrastructure. Applications for developments on sites which are part of a wider development will be expected to demonstrate how the infrastructure for the site relates to a wider holistic infrastructure strategy for the entire site. Any infrastructure in early phases of development should have regard to future interconnecting development phases;* and

We also suggest the following additional criterion for inclusion in this policy.

'Carefully controlling developments that would generate significant point source pollution such as some types of industrial activity and energy generation. Also, locating new sensitive receptors, such as new residential development, away from existing operational activities which generate odour and noise.'

Policy DM6 – Surface Water disposal, Foul Water disposal and treatment, watercourses, flood defences and consideration

Surface Water disposal

United Utilities supports the inclusion of this policy and the principles of ensuring the use of sustainable drainage systems within new developments. However, we request that the policy is strengthened to ensure consistency with national planning policy. This is essential if we are to respond to the challenge of climate change and the more regular occurrence of lengthy and high intensity rainfall events. The text set out below is our suggested amendment/ additional text that could be included within the first paragraph of this policy.

*'Development proposals should **prioritise include** the use of sustainable drainage systems **unless demonstrated to be inappropriate**.'*

We also suggest the following additional paragraphs for inclusion in the policy.

'When acquiring development sites, applicants are advised to consider the costs associated with drainage including the need to acquire the right to discharge to watercourse if this represents the most sustainable drainage option available.'

'The public sewers in South Lakeland are managed by United Utilities. Liaison with United Utilities, who operate a pre-development enquiry service, is essential to determine the most appropriate point of connection and rate of discharge to the public sewer network. Rates of discharge and points of connection will be secured by planning condition where necessary. Drainage proposals for sites will be expected to minimise a reliance on pumped drainage solutions as this is not in the interest of delivering sustainable development.'

'Applications for developments on sites which are part of wider development proposals, especially wider development plan allocations, will be expected to demonstrate how the drainage proposal for the site relate to a wider holistic drainage strategy for the entire site. Any drainage in early phases of development should have regard to future interconnecting development phases.'

'For proposals relating to the redevelopment of previously developed land, evidence of existing drainage arrangements, if any, should be provided.'

We wish to stress the importance of contacting United Utilities as early as possible to discuss the approach to drainage. Enquiries from interested parties should be made to Developer Services (WastewaterDeveloperServices@uuplc.co.uk).

Foul water disposal and treatment

With respect to the wording of this element of the policy, any wording relating to non-mains sewerage is most appropriately considered by the Environment Agency.

We suggest the following deletion to the existing policy.

~~*'In certain circumstances, a new development will be required to discharge foul water to the public sewerage system at an attenuated rate.'*~~

We also suggest the following additional wording.

'Points of connection will be secured by planning condition where necessary. Drainage proposals for sites will be expected to minimise a reliance on pumped foul drainage solutions as this is not in the interest of delivering sustainable development. Applicants should engage with United Utilities as soon as possible where there is an intention to connect foul water to the public sewer.'

Additional Policy - Groundwater Source Protection Zones and Water Catchment Land

We suggest the following additional wording for inclusion within your development management policies. This relates to development in Groundwater Source Protection Zones.

'Groundwater Source Protection Zones are an important part of the groundwater environment. Development within these zones should be in accordance with the Environment Agency position statement entitled 'Groundwater Protection: Principles and practice (GP3)'. The development should be supported by an appropriate risk assessment which considers the impact on the groundwater environment. The development proposals and any mix of uses will be expected to be masterplanned to minimise risk to the groundwater environment. For example, ensuring potentially polluting uses are acceptable in principle in the location proposed on any masterplan and including greenspace associated with residential development in the most sensitive locations such as adjacent to boreholes used for public water supply purposes. Additional protection measures will also be required in some locations, for example, higher specification sewerage pipework for development schemes in Groundwater Source Protection Zone 1. Development proposals should be supported by a construction management plan which sets out how the risk to the groundwater environment during any construction process will be managed. Early engagement with the relevant agencies and United Utilities is strongly recommended where development is proposed in Groundwater Source Protection Zones.'

'New development on land used for water supply catchment purposes, should identify any risk of pollution to water supply resources and associated mitigating measures.'

Additional Policy – Development near to Infrastructure Assets

We suggest the following additional policy relating to development near to existing infrastructure.

'Development proposals should ensure provision is included in the layout of development for the ability to access, maintain and repair existing and new infrastructure assets. Where development will take place near to existing assets, the applicant may be required to provide details of protection measures and a construction management plan to ensure the integrity of the asset is not compromised during or after construction.'

Draft Plan Consultation Document – Arnside & Silverdale AONB

Policy AS13 Water quality, sewerage and sustainable drainage

United Utilities is aware that not all areas are connected to the main sewerage system, resulting in the need for non-mains sewerage. We recommend that you should seek advice and guidance from the Environment Agency to discuss the implications for new development in such locations at an early stage.

United Utilities supports the principles set out within this policy and the need for any proposals to demonstrate how foul and surface water will be disposed of without detriment to the environment.

Proposed Housing Allocations

We have reviewed the proposed housing allocations, and wish to highlight the following sites:

AS18 – A6 Land off Queen’s Drive, Arnside (Map Ref A6)	<p>Our records indicate there are existing pressurized water assets running directly through this site with an associated easement. We strongly recommend the local planning authority and developer consider this site with us further so that we are able to determine whether the site is deliverable for new housing having regard to any diversions necessary. We recommend that this is given further consideration before the allocation is pursued further.</p> <p>Please note this area is served by foul sewers only and therefore the applicant will need to identify an alternative to the public sewer for surface water. There is no right to connect surface water to a foul only sewer and therefore an alternative must be identified. We recommend that this is given further consideration before the allocation is pursued further.</p>
AS19 – A8/9 Land on Hollins Lane, Arnside	<p>The site promoter should consider options for surface water discharge in accordance with the surface water hierarchy and national standards. We recommend that the infiltration options are given further detailed consideration before the allocation is pursued further. We are concerned there are limited options for discharge of surface water. There appears to be a surface water sewer in Swinate Road which is an option for further consideration.</p>
AS20 – A11 Land at Briery Bank, Arnside	<p>The site promoter should consider options for surface water discharge in accordance with the surface water hierarchy and national standards. We recommend that infiltration options are given further detailed consideration before the allocation is pursued further. We are concerned there are limited options for discharge of surface water.</p>
AS21 – B108 Land at Church Street, Beetham	<p>Please note this area is served by foul sewers only and therefore the applicant will need to identify an alternative to the public sewer for surface water. There is no right to connect surface water to a foul only sewer and therefore an alternative must be identified. We recommend that this is given</p>

	further consideration before the allocation is pursued further.
AS22 – B112 Land at Stanley Street, Beetham	Please note this area is served by foul sewers only and therefore the applicant will need to identify an alternative to the public sewer for surface water. There is no right to connect surface water to a foul only sewer and therefore an alternative must be identified in accordance with the surface water hierarchy. In this instance, and if infiltration is not practicable, there is a nearby watercourse which is approximately 70m to the north east. We recommend that this is given further consideration before the allocation is pursued further. The consideration should include whether the right to discharge to the watercourse can be acquired from the riparian land owner.
AS23 – S56 Land at Whinney Fold, Silverdale	<p>The site is not located near to the existing sewerage network and would therefore need to consider non-mains sewerage which is not the responsibility of United Utilities.</p> <p>Notwithstanding our limited role in this area for the discharge of wastewater, the site promoter should consider options for surface water discharge in accordance with the surface water hierarchy and national standards.</p>
AS24 – W88 Land North West of Sand Lane, Warton	The site promoter should consider options for surface water discharge in accordance with the surface water hierarchy and national standards. We recommend infiltration options are given further detailed consideration before the allocation is pursued further as we are concerned there are limited options for discharge of surface water. There appears to be a highway drain in Sand Lane however, this option would need to be discussed with the LLFA.
AS25 – W130 Land North of 17 Main Street, Warton	The site promoter should consider options for surface water discharge in accordance with the surface water hierarchy and national standards. We recommend infiltration options are given further detailed consideration before the allocation is pursued further as we are concerned there are limited options for discharge of surface water. There appears to be highway drains nearby however, these options would need to be discussed with the LLFA.
AS26 – A25/A26/A27 Station House and Yard, Arnside	The site promoter should consider options for surface water discharge in accordance with the surface water hierarchy and national standards. There appears to be a watercourse passing through the site.

	<p>The nearest public sewer is on the opposite side of the railway line which could have cost implications which need further consideration prior to allocation to ensure deliverability. The site promoter should note that connection to a rising main is not possible.</p> <p>It would be useful if the site promoter confirmed how the site currently drains foul water. United Utilities would welcome the opportunity to consider this site further.</p>
AS27 – B35/ B38/ B81/ B125 Land at Sandside Road and Quarry Lane, Sandside	<p>Our records indicate an existing asset runs in close proximity and within part of this cluster of sites. We will require an associated maintenance strip to access, repair and maintain these assets. The developer will need to consider this at an early stage and contact Developer Services (WastewaterDeveloperServices@uuplc.co.uk) to discuss at their earliest convenience to prevent any unnecessary expense or delays.</p> <p>We also wish to highlight two foul water pumping stations adjacent to the site boundaries. New development should include an off-set distance from these pumping stations.</p> <p>The site promoters should note that it is not possible to connect to the nearby rising sewers for foul water which will be an important cost consideration as the nearest gravity sewers are further away.</p> <p>The site promoter should consider options for surface water discharge in accordance with the surface water hierarchy and national standards.</p>
AS28 – S70 Lane at the Railway Goods Yard, Silverdale	<p>The site is not located near to the existing sewerage network and would therefore need to consider non-mains sewerage which is not the responsibility of United Utilities.</p> <p>Notwithstanding our limited role in this area for the discharge of wastewater, the site promoter should consider options for surface water discharge in accordance with the surface water hierarchy.</p>

United Utilities wishes to reiterate the importance of early dialogue and encourages interested parties to contact United Utilities Developer Services to discuss any water or wastewater queries/ issues/ proposals.



Summary

Moving forward, we respectfully request that United Utilities is consulted at all future stages. We are keen to continue working in partnership with South Lakeland District Council to ensure that all new growth can be delivered sustainably, and with the necessary infrastructure available, in line with their delivery targets.

United Utilities wishes to reiterate once again the importance of early dialogue and encourages interested parties to contact us to discuss any water or wastewater queries/issues or new development proposals.

If you have any queries or require further clarification on this representation, please do not hesitate to contact me on [REDACTED]

Yours faithfully

Jenny Hope
LDF Planning Manager
Developer Services & Planning