



**United Utilities Water Limited**

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<b>Our ref</b>	
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Dear Sir / Madam

**DEVELOPMENT MANAGEMENT POLICIES DEVELOPMENT PLAN DOCUMENT  
(DPD)– ISSUES AND OPTIONS DISCUSSION PAPER**

Thank you for your consultation seeking the views of United Utilities as part of the development plan process.

United Utilities aims to facilitate sustainable development whilst safeguarding our service to customers; assist in the development of sound planning strategies; identify future development needs; and secure the necessary long-term infrastructure investment.

We wish to build a strong partnership with all stakeholders to aid sustainable development and growth within the North West. 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.

Water and wastewater services are vital for the future well-being of your community and the protection of the environment. When developing your future planning policies and supporting documents it is important to consider the impacts on its community and environment and ensure infrastructure capacity is available.

United Utilities can most appropriately manage the impact of development on its 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.

United Utilities has provided comments to previous consultations throughout the Development Plan process. Please note that previous comments are still applicable and should continue to be taken into consideration when developing your Local Plan and supporting policies.

## **GENERAL COMMENTS**

United Utilities wishes to work closely with the Council during the Local Plan process to develop a coordinated approach for delivering sustainable growth in sustainable locations.

We note that the Local Plan is proposing a number of large development sites. The wastewater network will be able to better accommodate proposed future growth providing every opportunity is used to keep surface water out of the network. We request that the Local Planning Authority strongly enforces the surface water hierarchy (as set out in paragraph 80 of the National Planning Practice Guidance and Building Regulation H3).

The aim of the surface water hierarchy should be to discharge surface water run off as high up the following hierarchy of drainage options as reasonably practicable:

1. into the ground (infiltration);
2. to a surface water body;
3. to a surface water sewer, highway drain, or another drainage system;
4. to a combined sewer.

Developers will be expected to justify any proposals to discharge surface water into the sewerage network, particularly into combined sewers.

United Utilities will be able to better understand the impact of development on our network as more information becomes available on development proposals such as the approach to surface water drainage, points of connection, and the timing for the delivery of development, which is often only available at the planning application stage. In some cases it may be necessary to co-ordinate the delivery of development with the delivery of infrastructure.

We would therefore ask future developer(s) to contact United Utilities as early as possible to discuss water and wastewater infrastructure requirements for specific sites, to ensure that the delivery of development can be co-ordinated with the delivery of infrastructure. United Utilities currently offer a free pre-development enquiry service.

## **SPECIFIC COMMENTS**

### **Consultation Questions for General Requirements**

- 1. Which option do you think is appropriate?**
- 2. If you support the idea of such a policy what should it contain?**

United Utilities supports the establishment of a new development management general requirements policy that can be applied to any new type of development.

With regard to water and wastewater infrastructure, as detailed above, in some instances it may be necessary to coordinate infrastructure improvements with the delivery of development. In accordance with paragraphs 156 and 162 of the National Planning Policy Framework (NPPF), we recommend the following text is included as part of the Development Management Policies DPD in relation to infrastructure provision:

*"Once more details are known on development sites, for example the approach to surface water management and proposed connection points to the foul sewer network, it may be necessary to coordinate the delivery of development with timing for the delivery of infrastructure improvements.*

*At the larger development sites, it may be necessary to ensure that the delivery of development is guided by strategies for infrastructure which ensure coordination between phases of development over lengthy time periods and by numerous developers.*

*South Lakeland District Council will support the principle of investment in infrastructure to respond to development and environmental needs. Infrastructure is key to the delivery of sustainable development and economic growth and meeting the development needs of the Borough."*

With regard to large sites, United Utilities wishes to highlight the challenge that is often presented by fragmented ownership. Whilst masterplans often aspire to secure the delivery of development in a co-ordinated and holistic manner, this is often a major challenge in practice.

We encourage the council to carefully consider the deliverability issues and practical issues associated with sites in fragmented ownership. On such sites, we strongly encourage the council to task the site promoters to present a clear site wide infrastructure strategy.

### **Consultation Questions for Housing Optional Technical Standards**

#### **3. Which option do you think is appropriate?**

#### **4. Should any of the optional standards be applied?**

##### **a) Which ones and why?**

##### **b) To all new homes or just a percentage/just in certain locations?**

United Utilities supports the adoption of a new policy which encourages the incorporation of water efficiency measures into the design of new development, as follows:

*"The design of new development should incorporate water efficiency measures. New development should maximise the use of permeable surfaces and the most sustainable form of drainage, and should encourage water efficiency measures including water saving and recycling measures to minimise water usage."*

United Utilities wishes to highlight the importance of incorporating water efficiency measures as part of the design process for all new development. There are a number of methods that developers can implement to ensure their proposals are water

efficient, such as utilising rainwater harvesting and greywater harvesting for example.

Improvements in water efficiency help to reduce pressure on water supplies whilst also reducing the need for treatment and pumping of both clean and wastewater. It is a part of the delivery of sustainable development.

### **Consultation Questions for Sustainable Drainage**

**Question 45 – Which option do you think is appropriate?**

**Question 46 – If a new policy is preferable what should this contain?**

United Utilities recommends that the Council includes a policy in the Development Management Policies DPD on sustainable drainage systems, and suggest including the following wording is included within the policy wording in the 'Preferred Options' version of the document:

*"Surface water should be discharged in the following order of priority:*

- 1. into the ground (infiltration);*
- 2. to a surface water body;*
- 3. to a surface water sewer, highway drain, or another drainage system;*
- 4. to a combined sewer.*

*Applicants wishing to discharge to public sewer will need to submit clear evidence demonstrating why alternative options are not available. Approved development proposals will be expected to be supplemented by appropriate maintenance and management regimes for surface water drainage schemes. On large sites it may be necessary to ensure the drainage proposals are part of a wider, holistic strategy which coordinates the approach to drainage between phases, between developers, and over a number of years of construction.*

*On greenfield sites, applicants will be expected to demonstrate that the current natural discharge solution from a site is at least mimicked. On previously developed land, applicants should target a reduction of surface water discharge.*

*Landscaping proposals should consider what contribution the landscaping of a site can make to reducing surface water discharge. This can include hard and soft landscaping such as permeable surfaces.*

*The treatment and processing of surface water is not a sustainable solution. Surface water should be managed at source and not transferred. Every option should be investigated before discharging surface water into a public sewerage network. A discharge to groundwater or watercourse may require the consent of the Environment Agency."*

New development should manage surface water run-off in a sustainable and appropriate way. Developers should look at ways to incorporate an element of betterment within their proposals. This approach is in accordance with paragraph 103 of the NPPF.

## Consultation Questions for Pollution

### 49. Which option do you think is appropriate?

### 50. If a new policy is preferable what should this contain?

United Utilities supports the adoption of new policy that provides more detailed requirements to mitigate and reduce levels of pollution from a development.

United Utilities recommend the following text is included as part of the policy wording:

*"The proposed development of sensitive uses (such as residential) adjacent to existing sources of pollution (e.g. noise, odour, traffic etc.) must demonstrate through the submission of appropriate impact assessments that there would be no detrimental impact on future residential amenity."*

In the site selection process, we feel it is important to highlight that new development sites are more appropriately located away from existing operational sources of pollution such as noise and odour.

Our position is that it is more appropriate not to introduce new additional sensitive receptors near to an existing treatment works. If new receptors are to be introduced, the planning and masterplanning process should consider how the impact on the new receptors most appropriately be managed. This will require careful masterplanning, which should include an appropriate buffer between the new development and the treatment works informed by an impact assessment of the existing treatment works.

We recommend applicants planning development near an existing wastewater treatment works hold pre-application discussions with United Utilities at the earliest possible stage in the masterplanning process. This will ensure that when a planning application does come forward, appropriate consideration is given to the proximity of sensitive receptors to the wastewater treatment plant as part of the masterplanning process.

## Summary

We trust the above comments will be afforded due consideration by the Council in the preparation of its Local Plan. United Utilities would welcome the opportunity to meet with yourselves to discuss the response in more detail.

If you have any queries or would like to discuss this representation, please don't hesitate to contact me.

Yours faithfully

Gemma Gaskell  
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United Utilities Water Limited