



United Utilities Water Limited
Developer Services & Planning
1st Floor, Grasmere House
Lingley Mere Business Park
Lingley Green Avenue
Warrington
WA5 3LP



Your ref
Our ref
Date

5th October 2017

By Email (ldf@warrington.gov.uk)

Dear Sir / Madam,

**LOCAL PLAN REVIEW - PREFERRED DEVELOPMENT OPTION
CONSULTATION (SEPTEMBER 2017)**

Thank you for your consultation seeking the views of United Utilities as part of the Development Plan 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 the Development Plan and future 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.

The Local Plan Review will set out Warrington's proposed approach to meeting Warrington's need for new homes and jobs between now and 2037. United Utilities wishes to submit the following comments to the Council as part of the current Preferred Development Options Consultation.

GENERAL COMMENTS

United Utilities wishes to highlight that we will seek to work closely with the Council during the Local Plan process 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. United Utilities will continue to work with the Council to identify

any infrastructure issues and appropriate resolutions throughout the development of the Local Plan.

Future Site Allocations

Whilst the current Preferred Development Options document identifies strategic locations for new development, one of the roles of the Local Plan will be to allocate individual development sites to deliver specific types of development. The Council is aware from past discussions with colleagues that a fuller understanding of the impact on wastewater infrastructure can only be achieved once more details are known, such as the timescales for development, the approach to surface water management and the chosen points of connection.

Once more information is available with respect to specific development sites, which is often only at planning application stage, we will be able to better understand the potential impacts of development on infrastructure and, as a result, it may be necessary to coordinate the delivery of development with the timing for delivery of infrastructure improvements. We suggest that this should be included as a detailed development management policy and can advise on appropriate wording.

Please note that United Utilities seeks to undertake further discussions with the Council on technical matters relating to site-specific development, such as site drainage and the Surface Water Hierarchy, once it has identified its preferred site allocations. In your selection criteria, we would encourage the Council to consider 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 the public sewer. The need to minimise the connection of surface water to the public sewer is a critical matter for United Utilities. It reduces the likelihood of sewer flooding and pollution of the environment.

Development Areas and Infrastructure Capacity

United Utilities acknowledges that the Local Plan Review (Preferred Options Consultation) identifies some significant development areas across various settlements and local authorities, including the release of a substantial amount of Green Belt. United Utilities wishes to note that given the volume of growth that is proposed, it is likely that there will be a need to respond with investment in our infrastructure. It is important to acknowledge that the development plan will cover the period up to 2037. This contrasts with our 5 yearly investment periods. Our current investment period covers the period 2015-2020. We are currently preparing for our next investment period which will cover the period 2020-2025. Any infrastructure investment response will therefore be brought forward over a number of the 5 yearly investment periods of a water and sewerage company. United Utilities wishes to highlight that it may be necessary to co-ordinate the delivery of development with the delivery of new infrastructure. We have recommended a policy in this regard which is set out later in this representation.

Groundwater Source Protection Zones (SPZ's)

When assessing proposals for development within Groundwater Source Protection Zones (SPZ's) we would urge you to refer to the document 'Environment Agency Groundwater Protection: Principles and Practice (GP3)' to ensure any impact of development on groundwater quality in the area is most appropriately managed. The document encourages planners, developers and operators to consider the groundwater protection hierarchy in their strategic plans and when proposing new

development. In the first instance we would prefer development to not take place in close proximity to those groundwater protection zones which have a public water supply purpose. We have recommended a policy in this regard which is set out later in this representation. We recommend you also discuss any policy protection for the groundwater environment with the Environment Agency.

Wastewater Treatment Works (WwTW)

When considering the suitability of each of the sites you assess as part of the Preferred Options consultation, we would urge you to consider proximity to existing wastewater treatment works (WwTW). It is important to explain that WwTW can result in emissions which include odour and noise as well as attract vehicle movements from large tankers. It is possible that new sites could introduce new sensitive receptors closer to the treatment works.

Our position is that it is more appropriate not to introduce new additional sensitive receptors near to an existing treatment works as part of the preparation of a new development plan. If, however, you are assessing the suitability of sites near to existing wastewater treatment works, we would welcome the opportunity to discuss the sites in further detail to ensure appropriate consideration.

SPECIFIC POLICY RECOMMENDATIONS

Surface Water and Foul Drainage

New development should manage surface water run-off in a sustainable and appropriate way in accordance with national planning policy.

United Utilities recommends that the Council includes a policy in the emerging Local Plan on surface water management, and suggest including the following draft policy in the 'Preferred Options' version of the document:

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

An adequate soakaway or some other form of infiltration system.

An attenuated discharge to watercourse.

An attenuated discharge to public surface water sewer.

An attenuated discharge to public combined sewer.

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. Applicants wishing to discharge to public sewer will need to submit clear evidence demonstrating why alternative options are not available.

The preference will be for new development to include genuine sustainable drainage systems as opposed to underground tanked storage systems for surface water.

Approved development proposals will be expected to be supplemented by appropriate maintenance and management regimes for surface water drainage schemes.

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 in accordance with the non-statutory technical standards for sustainable drainage produced by DEFRA. In demonstrating a reduction, applicants should include clear evidence of existing positive connections from the site with associated calculations on rates of 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.

On large sites it may be necessary to ensure the foul and surface water 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. The applicant will be expected to include details of how the approach to foul and surface water drainage on a phase of development has regard to interconnecting phases within a larger site. Infrastructure should be sized to accommodate flows from interconnecting phases and drainage strategies should ensure a proliferation of pumping stations is avoided on a phased development."

With respect to the final paragraph of the above recommended policy, this is particularly relevant to the large development areas that you have provisionally identified. We recommend you give early consideration to a strategic approach to infrastructure on these development sites. With regards to drainage, this should include liaison with your colleagues in the Lead Local Flood Authority. 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 coordinated and holistic manner, this is often a major challenge in practice. Therefore we encourage the Council to carefully consider the deliverability issues and practical issues associated with sites in fragmented ownership. On such sites, we would strongly encourage the council to challenge the site promoters to present a clear site wide infrastructure strategy with clear evidence of any necessary 3rd party agreements.

On larger sites, it should be clearly demonstrated there is a formal mechanism in place which will ensure the landowners will work together to deliver a coordinated approach to infrastructure over the whole site. This is a key element of delivering sustainable development and is in the best interests of good planning.

Whilst we appreciate the Council has yet to identify any potential development sites as part of the Local Plan process, we strongly recommend this is addressed in advance of allocating specific sites.

Infrastructure Provision

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 detailed policy is included as part of the Joint Local Plan in relation to infrastructure provision:

"Once more details are known on development sites, for example, the approach to surface water management, the proposed connection points to the public sewer network and the demand for water from any particular occupier, 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.

The 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."

In the context of the need to be able to flexibly respond to the needs of the borough, we note we have a number of assets which are sited within the green belt in your local authority. These include:

- Warrington South WwTW;
- Glazebury WwTW;
- Lymm Sowbrook Wastewater Pumping Station; and
- Winwick Service Reservoir.

Whilst our preference would be for the location of these sites in the green belt to be reviewed, if they are to remain in the green belt, we wish to recommend a policy that allows for infilling or redevelopment in accordance with paragraph 89 of the National Planning Policy Framework.

These amendments would enable us to ensure we can continue to meet the growth and development aspirations of the Borough, by ensuring that the fundamental infrastructure requirements of these future developments can be achieved.

Water Efficiency

We note that Chapter 9: Energy and Climate Change of the consultation document makes no reference to water efficiency measures. Whilst we appreciate the Code for Sustainable Homes has now been scrapped as a result of the Government's 'Housing Standards Review' consultation, we suggest the emerging Joint Local Plan includes a new policy regarding water efficiency measures and 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 the treatment and pumping of both clean and wastewater.

Groundwater Source Protection Zones (SPZ)

With respect to the site selection process, we feel it is important to highlight that new development sites are more appropriately located away from locations which are identified as Ground Source Protection Zone 1 (SPZ1). Groundwater is a vital resource, supplying around one third of mains drinking water in England, however groundwater supplies are under pressure from development associated with an increasing population. The details of groundwater protection zones can be viewed on the website of the Environment Agency. We would also be happy to provide details if that would be helpful.

United Utilities' strong preference is for development to take place outside of any Environment Agency designated SPZ1. Accordingly, we recommend the following specific policy is included within the emerging Local Plan Review in regards to groundwater protection:

"Any proposals for new development within Groundwater Source Protection Zones must accord with Environment Agency guidance set out in its document titled 'Groundwater Protection: Principles and Practice (GP3) August 2013', or any subsequent iteration of the guidance.

New development within Groundwater Source Protection Zones will be expected to conform to the following:

i. **MASTERPLANNING** – careful masterplanning is required to mitigate the risk of pollution to public water supply and the water environment. For example, open space should be designed so it is closest to the boreholes so as to minimise the potential impact on groundwater. In addition, an appropriate management regime will be secured for open space features in the groundwater protection zone.

ii. **RISK ASSESSMENT** - a quantitative and qualitative risk assessment and mitigation strategy with respect to groundwater protection will be required to manage the risk of pollution to public water supply and the water environment. The risk assessment should be based on the source-pathway-receptor methodology. It shall identify all possible contaminant sources and pathways for the life of the development and provide details of measures required to mitigate any risks to groundwater and public water supply during all phases of the development. The mitigation measures shall include the highest specification design for the new foul and surface water sewerage systems (pipework, trenches, manholes, pumping stations and attenuation features).

iii. **CONSTRUCTION MANAGEMENT PLAN** - Construction Management Plans will be required to identify the potential impacts from all construction activities on both groundwater, public water supply and surface water and identify the appropriate mitigation measures necessary to protect and prevent pollution of these waters.

Within Source Protection Zone 1, pipework and site design will be required to adhere to a high specification to ensure that leakage from sewerage systems is avoided."

Health and Well-Being

In regards to health, well-being and maximising the quality of residential amenity, United Utilities wishes to highlight that it is more appropriate to locate sensitive uses (such as residential) away from existing sources of noise and odour.

We feel it is important to highlight that new development sites are more appropriately located away from our existing operational infrastructure. This is particularly relevant to our wastewater treatment works which are key operational infrastructure

We wish to highlight that a wastewater treatment works can result in emissions which include odour and noise. Therefore, if you are considering any sites for new allocations, especially housing allocations, near to wastewater treatment works, you should carefully consider the sites with your Environmental Health colleagues. This is important when comparing such sites with potential alternative sites that may be available to you for allocation. The position of United Utilities is that when considering a range of sites to meet the housing needs of the borough, it would be more appropriate to identify new housing sites, which are sensitive receptors, that are not close to a wastewater treatment works.

We wish to highlight our treatment works in your area include Warrington North WwTW, Warrington South WwTW and Glazebury WwTW. Plans of each of these sites are enclosed.

With respect to Warrington North and South WwTWs, we note the potential development areas which are close to the sites. With respect to Warrington North, we note development parcels in the wider area both to the north and south of the River Mersey which are part of Warrington Waterfront. With respect to Warrington South we note the area identified as the South West Extension. United Utilities would welcome the opportunity to discuss development in proximity to the treatment works in greater detail to try and ensure any development is most appropriately located with respect to any potential new sensitive receptors.

LAND AVAILABLE FOR ALTERNATIVE USE – LINGLEY MERE

United Utilities owns a parcel of land adjacent to its existing main offices at Lingley Mere Business Park. This parcel of land is also adjacent to the recent residential planning permission. We have enclosed a plan of the site. The land is anticipated to be available during the plan period and can therefore be considered by the Council as a potential residential site as part of the Local Plan process.

Summary

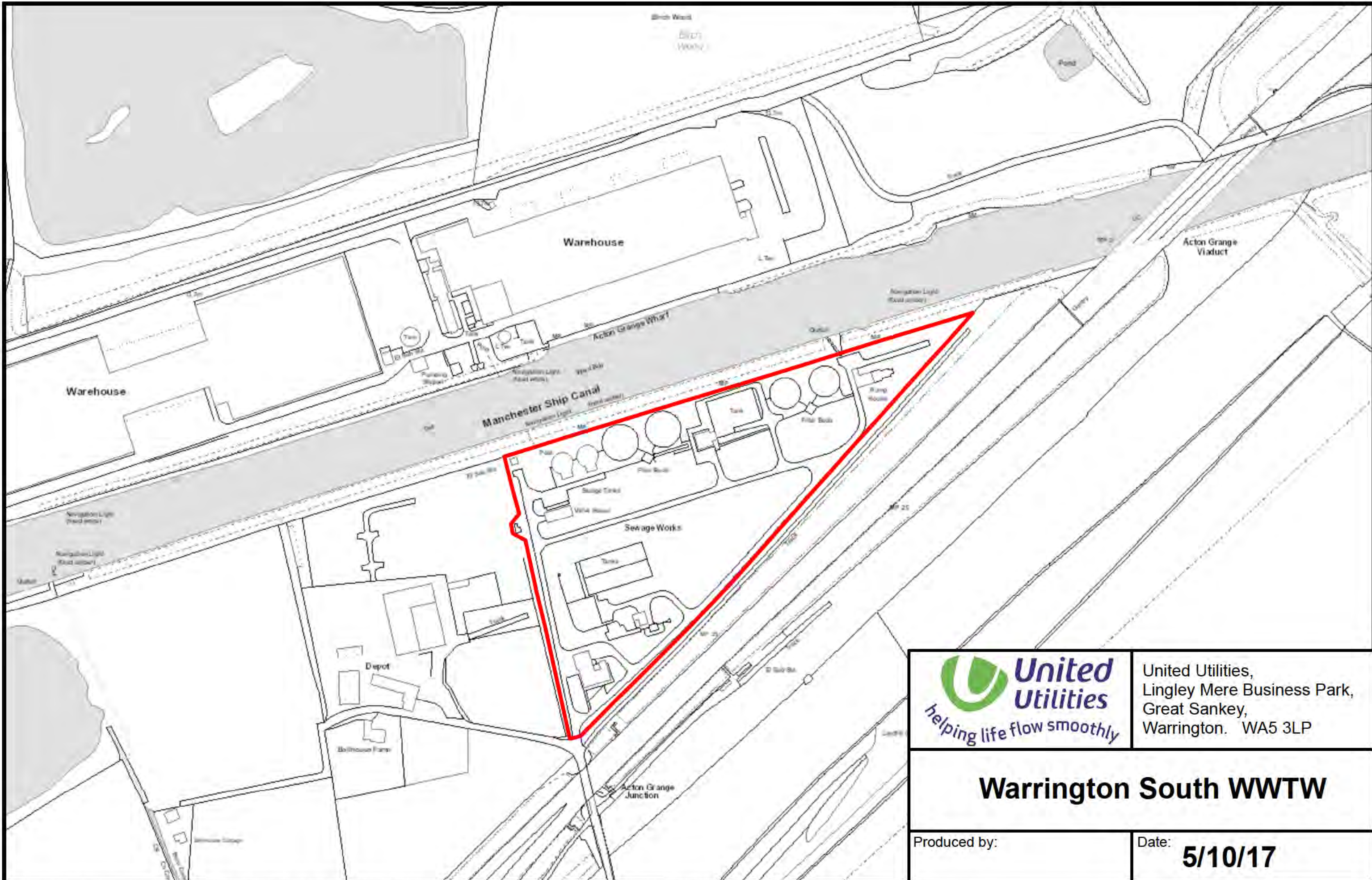
Moving forward, we respectfully request that the Council continues to consult with United Utilities for all future planning documents. We are keen to continue working in partnership with Warrington Borough Council to ensure that all new growth can be delivered sustainably, and with the necessary infrastructure available, in line with the Council's delivery targets.

In the meantime, if you have any queries or require further clarification on any of the above matters, please do not hesitate to contact me.

Yours faithfully

[REDACTED]

Planning Manager
Developer Services & Planning
United Utilities Water Limited



United Utilities,
Lingley Mere Business Park,
Great Sankey,
Warrington. WA5 3LP

Warrington South WWTW

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Date:

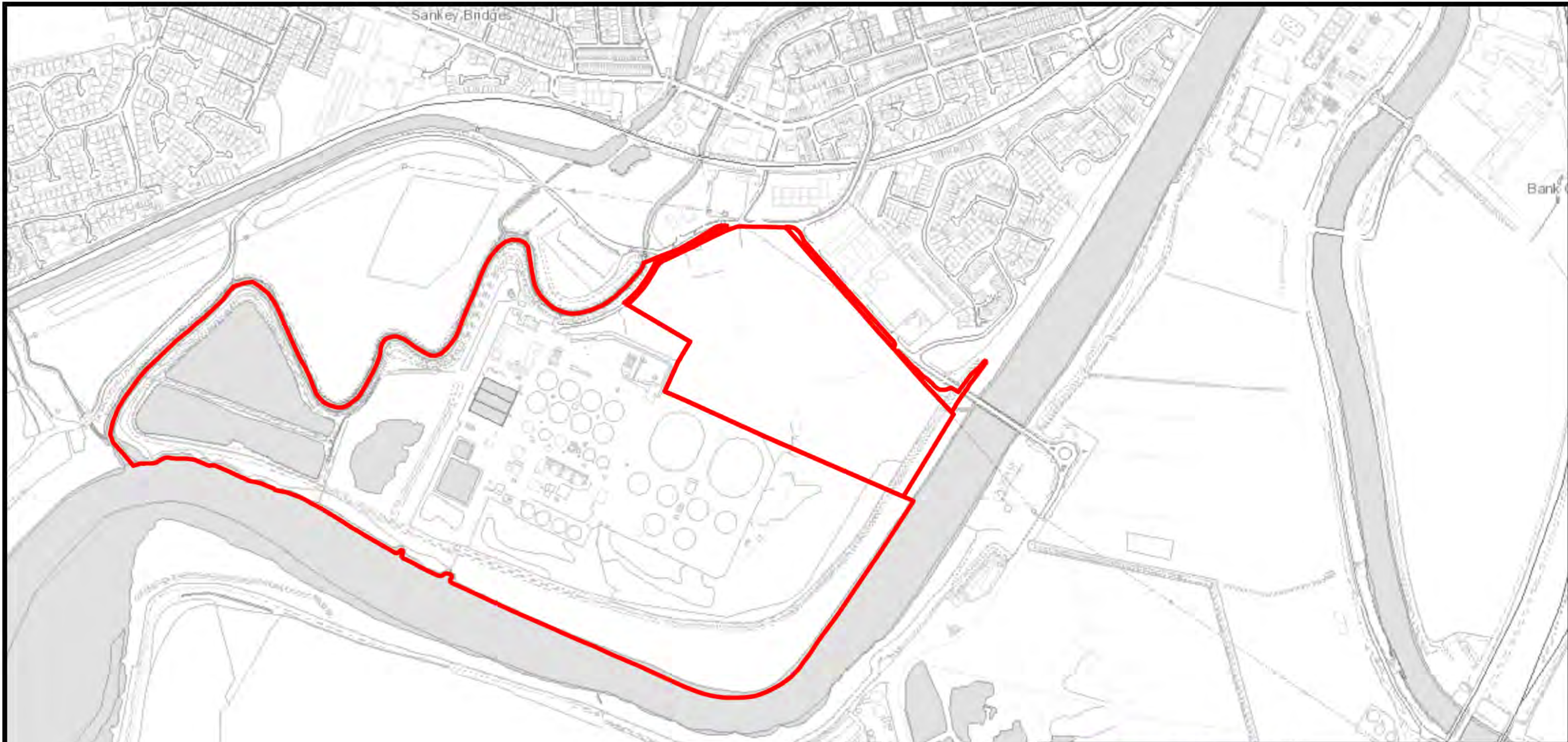
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Warrington North WWTW

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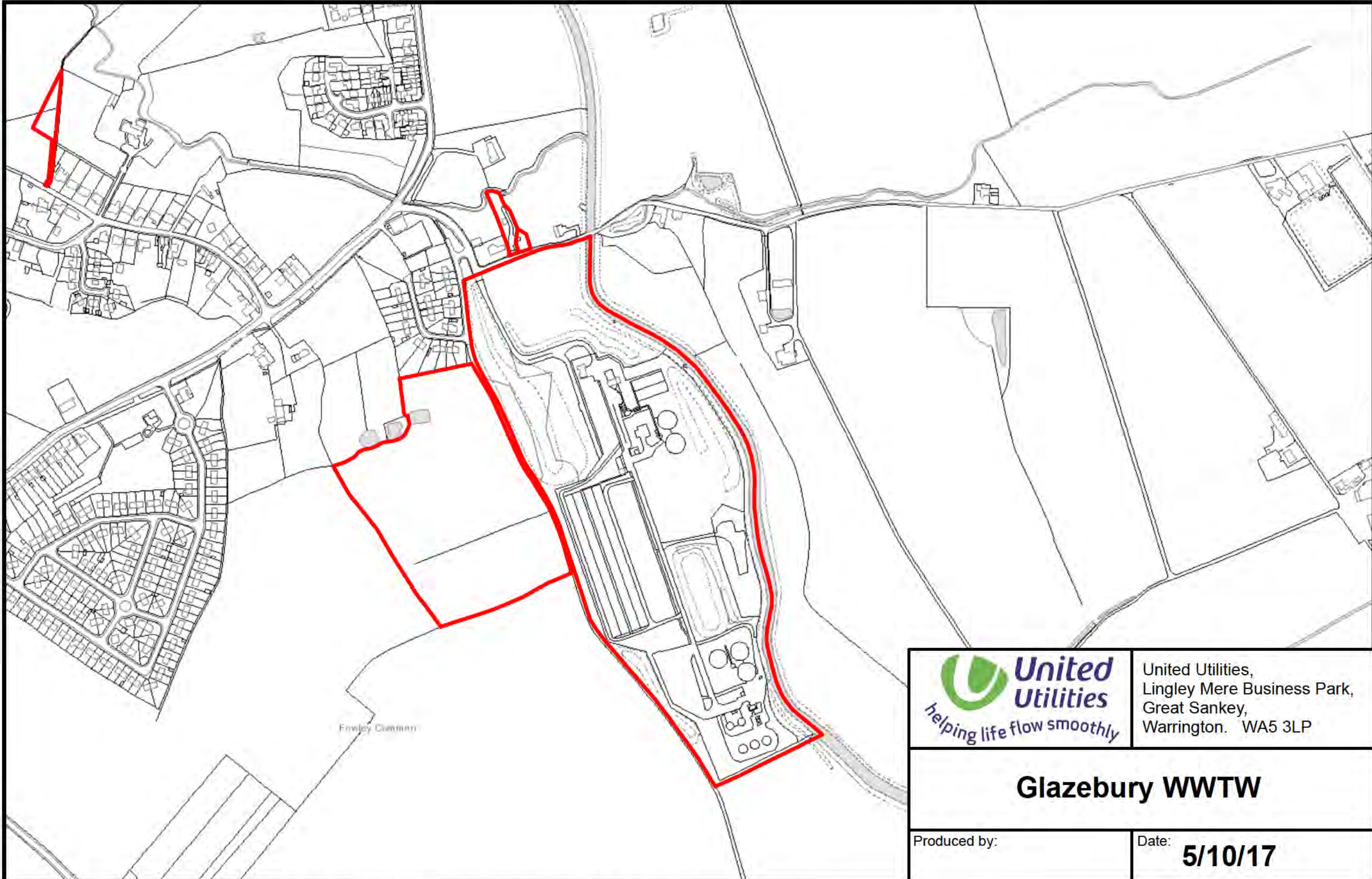
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Glazebury WWTW

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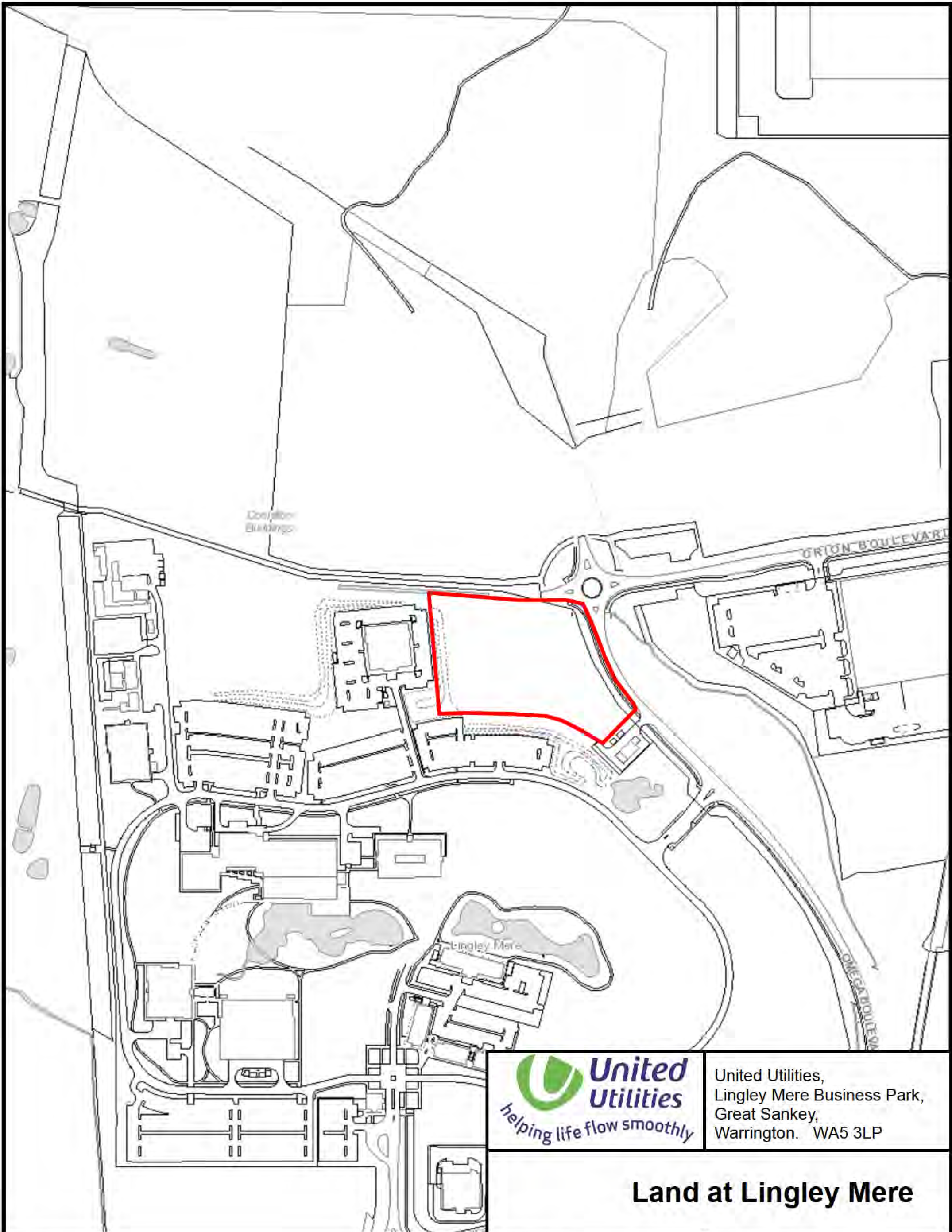
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Land at Lingley Mere

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