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Planning Policy and Programmes  
Warrington Borough Council  
New Town House  
Buttermarket Street  
Warrington  
WA1 2NH

**Date** 17 June 2019

By Email ([ldf@warrington.gov.uk](mailto:ldf@warrington.gov.uk))

Dear Sir / Madam,

**LOCAL PLAN REVIEW – PROPOSED SUBMISSION VERSION LOCAL PLAN (JUNE 2019)**

Thank you for your consultation seeking the views of United Utilities Water Limited (UU) as part of the development plan process.

UU aims to facilitate sustainable development whilst safeguarding our service to customers; and assist in the development of sound planning strategies, to identify future development needs and to 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.

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 and this is reflected in our below recommended amendments to the draft policy.

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.

United Utilities wishes to make the following comments on the sites that are being considered for allocation. These comments should be read in conjunction with our previous correspondence including our response to the Preferred Options.

We wish to highlight our **free pre-application service** for applicants to discuss and agree drainage strategies and water supply requirements. We cannot stress highly enough the importance of contacting us as early as possible. Enquiries are encouraged by contacting:

Developer Services - Wastewater

Tel: 03456 723 723

Email: [WastewaterDeveloperServices@uuplc.co.uk](mailto:WastewaterDeveloperServices@uuplc.co.uk)

Website: <http://www.unitedutilities.com/builder-developer-planning.aspx>

Developer Services – Water

Tel: 0345 072 6067

Email: [DeveloperServicesWater@uuplc.co.uk](mailto:DeveloperServicesWater@uuplc.co.uk)

Website: <http://www.unitedutilities.com/newwatersupply.aspx>

### **General Comments**

As more information becomes available on development proposals such as the approach to surface water drainage and the timing for the delivery of development, which is often only available at the planning application stage, it may be necessary to co-ordinate the delivery of development with the delivery of infrastructure. We therefore request the Local Planning Authority encourages any future developer(s) to contact UU 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.

Many of the smaller settlements in Warrington will be supported by infrastructure which is proportionate to its location. Therefore, disproportionate growth in any settlement, especially small settlements, has the potential to place a strain on existing water and wastewater infrastructure.

Generally Greenfield sites have limited or no supporting water supply and/or sewerage infrastructure assets; they may be adjacent to existing infrastructure assets that are located on the fringe/limits of the existing water supply and/or sewerage infrastructure networks which are of a small diameter and have limited capacity to support additional growth. Providing supporting infrastructure could result in the need to upsize the existing assets to support the additional capacity needs; therefore, this may result in a need for a co-ordinated approach to phase development in line with any supporting infrastructure works.

### **Specific Comments**

United Utilities acknowledges that the Draft Plan identifies significant development areas across various settlements within the borough, including the release of substantial amounts of Green Belt. UU wishes to note that given the volume of growth that is proposed for South Warrington (including the South East Urban Extension and Garden Suburb), it is likely that there will be a need to respond

with investment in our infrastructure. It is therefore 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. UU wishes to highlight that it may be necessary to co-ordinate the delivery of development with the delivery of new infrastructure.

United Utilities wishes to highlight that we wish to continue the constructive communication we have had with the Council to ensure a co-ordinated approach to the delivery of allocations. United Utilities have attended a number of meetings since the first draft to initially highlight relevant infrastructure issues and key principles to be considered in order to most appropriately manage the impact on our assets.

All UU assets and associated easements will need to be afforded due regard in the masterplanning process as they may impact on deliverability dependent on the location within the site. We therefore request continued involvement in any masterplanning process for each site.

We ask any future developers to contact United Utilities to explore options for addressing the above as early as possible. Enquiries are encouraged via the contact details above and plans of our assets are available from a range of providers including our Property Searches team at 08707 510 101 or [property.searches@uuplc.co.uk](mailto:property.searches@uuplc.co.uk).

### **Policy Recommendations**

United Utilities wishes to highlight that it has concerns regarding large sites which are in multiple ownership. The experience of United Utilities is that where sites are in multiple ownership, the achievement of sustainable development can be compromised by developers/applicants working independently. We believe that raising this point at this early stage in the preparation of the development plan is in the best interest of achieving challenging housing delivery targets from allocated sites in the most sustainable and co-ordinated manner. As such, the Policy recommendations made below in relation to Draft Policy MD1, MD2 and MD3 recommend that you require applications for developments on sites, which are part of large development plan allocations, to demonstrate how the on-site water and wastewater infrastructure for the site relates to a wider holistic water and wastewater infrastructure strategy for the entire site. Any water and wastewater infrastructure in early phases of development should have regard to future interconnecting development phases.

#### **Policy MD1 - Warrington Waterfront**

United Utilities supports the requirement for exemplary sustainable drainage systems within the Policy. However, would recommend the following additions [in blue] to achieve a sustainable and holistic drainage strategy:

**MD 1.2 (6)** *“The masterplan must be informed by a Green Infrastructure Strategy, a site wide Foul and Surface Water Strategy, a site wide Clean Water Strategy and a Transport Assessment. [Such strategies must demonstrate co-ordination between any phases of development, ensure unfettered](#)*

*rights between various parcels and outline a timeline for the delivery of on-site infrastructure. Submitted drainage strategies should ensure a proliferation of pumping stations is avoided.”*

**MD 1.3 (51)** *“Development within the Waterfront must not inhibit the operation of the existing gas pipeline, power line, **sludge main** and sewage works that are on or adjacent to the site.*

*“The allocation includes existing water and wastewater infrastructure. Access to this infrastructure should be maintained within the proposed development layouts. Development layouts will be expected to be designed to take these into account and applicants may be required to submit a management plan and details of any protection provisions to ensure the integrity of the water and sewerage assets are maintained both during and after construction.”*

It is acknowledged that there are likely to be proposed infrastructure improvements required to accommodate the proposed growth in this area. It is important to highlight that there may be an opportunity to coordinate the delivery of any infrastructure improvements alongside new transport schemes.

#### Policy MD2 – Warrington Garden Suburb

Similarly to the above, UU would recommend the following additions [in blue]:

**MD 2.2 (8)** *“The Development Framework will confirm the strategic elements of the Green Space and transport networks, the infrastructure necessary to support the Garden Suburb as a whole and will define the boundaries of the 3 villages, the Neighbourhood Centre, the Country Park and areas to be protected for green infrastructure. It must be informed by a site wide Green Infrastructure Strategy and site wide Foul and Surface Water Strategy and site wide Clean Water Strategy. As part of the site wide strategies, applicants will be expected to include details of how the approach to drainage/clean water infrastructure has regard to interconnecting phases within the allocation. Drainage/clean water strategies should ensure associated infrastructure is sized to accommodate flows from interconnecting phases. Such strategies will also be expected to demonstrate unfettered rights between the various parcels of development within a wider development to prevent the formation of ‘ransom situations’ between separate phases of development. Submitted drainage strategies should ensure a proliferation of pumping stations is avoided.”*

**MD 2.2 (63):** *The allocation includes existing water and wastewater infrastructure. Access to this infrastructure should be maintained within the proposed development layouts. Development layouts will be expected to be designed to take these into account and applicants may be required to submit a management plan and details of any protection provisions to ensure the integrity of the water and sewerage assets are maintained both during and after construction.*

#### MD 3 (South West Urban Extension)

UU would propose the following additions [in blue] to the Policy:

**MD3.2 (5)** *“The masterplan must be informed by a Green Infrastructure Strategy, a site wide Foul and Surface Water Strategy, a site wide Clean Water Strategy and a Transport Assessment. Such strategies must demonstrate co-ordination between any phases of development, ensure unfettered*

*rights between various parcels and outline a timeline for the delivery of on-site infrastructure. Submitted drainage strategies should ensure a proliferation of pumping stations is avoided.”*

**MD 3.2 (40)** “Development within the urban extension must not impact on the operation of (or impede required access to) the existing gas pipeline, power line and sewage works that are on or adjacent to the site. *In liaison with the statutory undertaker applicants may be required to submit appropriate impact assessments in respect of development proposed in the vicinity of these installations and thereafter incorporate mitigating measures such as green space buffers between the proposed development and the respective installations.*

*The development layout should ensure an appropriate access is maintained to the existing wastewater treatment works. Applicants will be required to provide evidence, and when applicable, mitigating measures to ensure that the occupiers of new developments will enjoy an appropriate standard of amenity and will not be adversely affected by neighbouring uses.*

*The allocation includes existing water and wastewater infrastructure. Access to this infrastructure should be maintained within the proposed development layouts. Development layouts will be expected to be designed to take these into account and applicants may be required to submit a construction management plan and details of any protection provisions to ensure the integrity of the water and sewerage assets are maintained both during and after construction.”*

#### Policy OS5 – Lymm (Massey Brook Lane)

Under the heading of Utilities and Environmental Protection, we recommend the following additional criterion (in blue) given the location of the site in a groundwater source protection zone.

*“Given the location of the site in a groundwater source protection zone, the applicant may be required to undertake an assessment of the risk to the groundwater environment and identify, agree and implement any appropriate mitigating measures in liaison with the local planning authority.”*

#### Policy OS7 – Lymm (Rushgreen Road/Tanyard Farm)

Under the heading of Utilities and Environmental Protection, we recommend the following additional criterion (in blue) given the location of the site in a groundwater source protection zone.

*“Given the location of the site in a groundwater source protection zone, the applicant may be required to undertake an assessment of the risk to the groundwater environment and identify, agree and implement any appropriate mitigating measures in liaison with the local planning authority.”*

#### Policy OS9 (Land to the north of Winwick) and Winwick Service Reservoir

We wish to highlight that we have concerns when new housing is in close proximity to significant assets. It is noted that site reference OS9 is adjacent to Winwick Service Reservoir. With respect to this draft allocation we wish to highlight a range of matters which include:

1. The potential impacts on water quality resulting from construction close to the boundary of the reservoir and in groundwater source protection zones 1 and 2. Our strong preference is for development to take place outside of any Environment Agency designated SPZ1.
2. The site is an operational asset that operates 24/7 and may result in noise that needs to be given due regard in the preparation of a new application for planning permission.
3. The Service Reservoir is surrounded by large water network supply pipes transporting water to and from the asset. There is a concern that new development close to these assets will impact on our ability to effectively maintain them.
4. Careful masterplanning is required to mitigate the above issues and in particular to mitigate the risk of pollution to public water supply / the water environment.

We would like to remind you that all of our assets will need to be afforded due regard and you should be aware that serious complications could arise because significant existing infrastructure passes through the proposed allocation. It is essential that constructive discussions between United Utilities, the Local Planning Authority and the applicant take place if the scheme is progressing further, in a bid to highlight any asset protection measures that may have significant impact upon the site layout or even boundary.

Any future discussions will need to also consider site investigation activities, methods of construction and day to day operation and maintenance of the scheme to ensure that any risk to the reservoir, our network and groundwater used for public water supply is prevented. We are keen to ensure that water supply resources and our customers are not detrimentally impacted by this development. The levels of service we provide to our customers and the water quality and environmental standards that we have to achieve must be considered as part of any continuing discussions.

Given the location of the site in Ground Water Source Protection Zones 1 and 2 if you are minded to continue with this allocation, UU recommend that the following criteria [in blue] should be included under the Policy Section '*Utilities and Environmental Protection*',

- *The applicant should liaise with United Utilities regarding the proximity of development to the existing reservoir, existing water supply pipes and given the location of the site within a groundwater source protection zone.*
- *Careful masterplanning is required to mitigate the risk of noise and to water supply assets and the pollution of 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.*
- *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, the water environment and water supply assets. 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).*

- *The development should be designed to provide an easement width of 10m (5m either side) of the existing water supply infrastructure. The applicant will be required to prepare and agree a management plan to ensure the impacts on the water supply infrastructure is managed and mitigated during the construction process and include mitigating measures to protect against any impact on the water supply infrastructure during the operational life of the development.*
- *Construction management plans will be required to identify and mitigate 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."*

### Policy ENV2 – Flood Risk and Water Management

United Utilities strongly supports the inclusion of Policy ENV2 within the Local Plan.

### Policy INF 3 (Utilities and Telecommunications)

UU supports the inclusion of Policy INF 3 in the Local Plan. However, would like to see the following additions [in blue] to the Policy:

*3. Developers will be required to work with the Council and appropriate providers to deliver the necessary physical infrastructure and networks as an integral part of all new developments, taking into account the need to 'future proof' development to accommodate emerging technologies. Developers will be required to show early dialogue between developers and infrastructure providers to identify the infrastructure needs arising from new development and ensure that these are addressed through building design, utility networks and connections in time to serve the proposed development.*

*4. On large development sites or sites developed on a phased basis, applicants will be required to ensure that the delivery of development is guided by site wide strategies for infrastructure (e.g. foul, surface water and clean water) which ensure coordination between phases of development over lengthy time periods and by numerous developers. Conditions or planning obligations may be used to secure these phasing arrangements.*

*6. Development proposals for new, expanded or improved utility service infrastructure providing essential services and facilities, including electricity supply, gas or heating supply, water supply and waste water management, that comply with other relevant Plan policies will be permitted provided they can demonstrate that there is an identified need for such a facility within the Plan area, which cannot be met through existing facilities and that they minimise environmental harm, and provide adequate mitigation measures, in light of operational requirements and technical limitations. Development proposals at existing utility sites in the green belt or open countryside either in the form of infilling or redevelopment, will be supported where they are needed to respond to future growth and environmental needs.*

### **Recommended Additional Considerations / Policies**

Notwithstanding the proximity of Draft Allocation OS9 (Winwick) to UU's Water Treatment Works, we also note the proximity of the following allocations to our Waste Water Treatment Works (WwTWs):

- **Warrington Waterfront:** The Site is located in close proximity to Warrington South Waste Water Treatment Works (located beyond the railway line to the south) and Warrington North Waste Water Treatment Works (beyond the River Mersey to the north).
- **Warrington South Urban Extension** - The Site is located in close proximity to Warrington South Waste Water Treatment Works, beyond the railway line.
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When preparing the Development Framework / SPDs for the above allocations, we would urge you to consider the proximity of housing to these WwTWs. It is important to explain that a WwTW is an industrial operation which can result in emissions. These emissions include odour and noise. A wastewater treatment works can also attract flies. The wastewater treatment works is also subject to vehicle movements from large tankers. It is also important to note that development in close proximity to a treatment works could preclude future expansion to meet future growth needs.

In line with the current "illustrative masterplans" provided in the Draft Plan, we would expect the open space or employment element to act as a buffer between the housing development and the WwTW.

### **Ground Water Protection Zone**

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 source protection zones can be viewed on the website of the Environment Agency.

Given that a large part of the borough falls within Ground Water Source Protection Zones, United Utilities considers it is important to highlight that new development sites (when undertaking the site selection process) are more appropriately located away from locations which are identified as Groundwater Source Protection Zone 1 (SPZ1). Any development should be in accordance with the guidance notes on groundwater protection on [www.gov.uk](http://www.gov.uk). The Sites located within GWPZ 1 and 2 are:

- OS9 Winwick (**GWPZ 1 and 2**)
- MD3 SW Urban Extension (**GWPZ 2**)
- OS5 Lymm (Massey Brook Lane) (**GWPZ 2**)
- OS7 Lymm (Rushgreen Road / Tanard Farm) (**GWPZ 2**)
- Main Existing Urban Area (**GWPZ 2**)

Our strong preference is for development to take place outside of any Environment Agency designated SPZ1. Whilst we acknowledge the reference to groundwater within the specific allocation policies, this is not all-encompassing and therefore we recommend a standalone policy is included within the emerging Local Plan in regard to groundwater protection.



*“Any proposals for new development within Groundwater Source Protection Zones must accord with central government guidance set out in its Groundwater Protection guides on [www.gov.uk](http://www.gov.uk), or any subsequent iteration of the guidance.*

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

*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.*

*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).*

*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.”*

### Water Efficiency

We note that the Draft Plan makes no reference to water efficiency measures. Whilst we appreciate the Code for Sustainable Homes has now been abolished as a result of the Government’s ‘Housing Standards Review’ consultation, we suggest the local plan includes a new policy regarding water efficiency measures and the design of new development as follows. Whilst UU’s first preference would be to have a standalone policy on water efficiency, UU would also be supportive of the inclusion of the following wording as a criterion under Policy DC6 (Quality of Place) under the sub heading ‘Design and Layout’:

*“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.

It is important to highlight that ensuring water efficiency standards are included as part of new development will reduce pressure on water supplies whilst also reducing the need for the treatment and pumping of both clean and wastewater and therefore reduce the wider impact on the environment.

### **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

Adam Brennan  
Developer Services & Metering  
United Utilities Water Limited