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By email only: npconsultation@bollington-tc.gov.uk

Your ref:

Our ref:

Date: 22-JUL-24

Dear Sir / Madam

BOLLINGTON TOWN COUNCIL – BOLLINGTON NEIGHBOURHOOD PLAN UPDATE 2024 CONSULTATION

Thank you for your consultation seeking the views of United Utilities Water Limited (U UW) as part of the modification of the Neighbourhood Plan (NP) for Bollington. U UW 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 Cheshire East. 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.

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

U UW 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 U UW on the detail of their design and the proposed construction works.

All U UW 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 U UW 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

Housing Policy HO.P2 – Housing Location

U UW recommends that criterion 4 of this policy includes reference to all sources of flood risk rather than ‘flood plains’. National planning policy and practice is clear that decisions on planning applications need to take account of all sources of flood risk. We recommend the following amended wording:

4. Residential development will not be supported on flood plains, in locations at risk of any source of flooding, or in locations which increase the risk of flooding, taking into account the effect of the topography of Bollington on flooding potential.

Housing Policy HO.P4 – Design of Housing

U UW welcomes this policy namely the various criteria which seek to drive the construction of sustainable homes and carbon neutral development. That said, we note that there is no reference to the sustainable management of water, which is a critical element of the response to climate change. We therefore recommend criteria relating to water efficiency and sustainable drainage are also included in the policy.

Water Efficiency

Building Regulations Part G includes an optional standard for water efficiency of 110 litres per person per day (l/p/d) 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 criteria to Policy HO.P4.

‘All new residential developments must achieve, as a minimum, the optional requirement set through Building Regulations Requirement G2: Water Efficiency or any future updates.

We also suggest that wider non-residential development should also be the subject of water efficiency requirements as per the below recommended wording:

‘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.’

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

We recommend the following wording for inclusion in your policy. We suggest that this would be most appropriately included as a policy relating to all development rather than just new residential proposals.

'All applications must be supported by a strategy for foul and surface water management. Surface water must be discharged in accordance with the surface water hierarchy in national planning practice guidance.

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 must be integrated with the landscaped environment and the strategy for biodiversity net gain.

Explanatory Text

Application of the hierarchy for managing surface water is 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 must 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, 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.'

Investment in Future Infrastructure

We note the various policies in the draft plan relating to the environment and infrastructure requirements. In this context, we wish to highlight the investment associated with our water and wastewater infrastructure. This is influenced by a number of drivers including the construction of new facilities to take account of new environmental requirements, growth, the need to respond to the carbon challenge, or the need to invest in new updated infrastructure. In our next investment period (2025-30), we are proposing the biggest investment in water and wastewater services across the North West in over 100 years. Our recent submission to Ofwat proposed £13.7 billion of planned investment between 2025-30, which is now under consideration by our regulator and will be the subject of a final determination.

UWU requests the support of all bodies for future investment in infrastructure in order to be able deliver water and wastewater infrastructure investment in a timely manner. UWU wishes to highlight that it owns assets which are currently situated in protected areas such as green belt and in green space. Upgrades to these 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 region and future environmental drivers.

The drivers for this investment include the Environment Act 2021, which has set a requirement to progressively reduce storm spills into the environment. This obligation has triggered the need for significant future investment in our wastewater assets (treatment and network). Such investment will be constrained by engineering circumstances to determine the most appropriate location for additional storage to reduce spills. This may necessitate investment in constrained and protected locations in our urban and rural environments such as local green space, open countryside and green belt. Consistent with meeting its obligations, UWU requests that NP policy is worded to recognise that infrastructure improvements, located within protected land, are appropriate forms of development. We also request wider support for water and wastewater infrastructure investment that is ultimately beneficial to the environment, biodiversity, watercourses and facilitates identified growth so that our investment can be delivered in the most timely and effective manner. The following policy wording is recommended:

'The Neighbourhood Plan supports water and wastewater infrastructure investment which facilitates the delivery of wider sustainable development and the meeting of environmental objectives 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.'

This policy would enable us to ensure we can continue to meet the growth and development aspirations of the region, by ensuring that fundamental infrastructure requirements are met and that we are able to respond to the need for investment in our assets to protect the environment, maintain water supply and reduce flood risk.

In accordance with our above comments, we also suggest following amendments to the Open Space Policy EOS.PI – Designation of Open Spaces.

Open Space Policy EOS.PI – Designation of Open Spaces

We recommend the following additional criterion to this policy:

(d) The development is for essential water and wastewater infrastructure to meet wider environmental objectives.

Summary

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

Yours faithfully



Planning, Landscape and Ecology
United Utilities Water Limited

Enc. Water Resources West Evidence