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Your ref	
Our ref	DC/15/1813
Date	15 July 2015

Sefton Local Plan
Magdalen House
Trinity Road
Bootle
L20 3NJ

Dear Sir / Madam

SEFTON LOCAL PLAN: LETTER OF SUPPORT

United Utilities wishes to build a strong partnership with all Local Planning Authorities (LPAs) 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
- help inform our future infrastructure investment needs.

Water and wastewater services are vital for the future health and well-being of local communities and the protection of the environment. When progressing with the development plan and future policies, United Utilities requests LPAs to consider the availability of infrastructure and the coordination required to deliver new infrastructure for new development.

Duty to Cooperate

The Localism Act (2011) sets a legal duty for cooperation between LPAs and other public bodies on planning issues. This is reflected in national guidance under Paragraph 178 of the National Planning Policy Framework (NPPF). In addition, Paragraph 158 requires LPAs to produce a Local Plan based on adequate, up to date and relevant evidence about the economic, social and environmental characteristics and prospects of

the area. Infrastructure is specifically referenced under Paragraph 162, which states LPAs should work with other authorities and providers to assess the quality and capacity of infrastructure and its ability to meet forecast demands. This is further emphasised under Paragraph 13 [Reference ID 9-013-20140306] of the National Planning Practice Guidance (NPPG) which reinforces the message of infrastructure being a critical element of strategic planning. The NPPG specifically states that the involvement of infrastructure providers in local plan preparation is critical to ensure local plans are deliverable. The NPPG also expects private utility companies to engage positively in the plan making process. These elements are essential for the Local Plan examination process in terms of demonstrating that the submitted Local Plan meets the tests of soundness.

United Utilities can confirm that it has positively engaged in the plan making process and representations have been made to Sefton Council during key consultations. Further engagement has taken place with the LPA through a number of meetings across the plan making period. This has enabled Sefton Council to consider the availability of water and wastewater infrastructure and ensure this is reflected in policy.

Water and sewerage companies are statutory consultees on the preparation of development plans. The involvement of United Utilities in the Local Plan preparation process will enable United Utilities to most appropriately manage the impact of future development on its infrastructure. It has been recognised that it may be necessary to co-ordinate the delivery of development with the delivery of infrastructure in some circumstances.

Additional Comments

United Utilities also wishes to submit the following comments to the Council and landowners / developers for consideration.

In January 2015, the Council made United Utilities aware of the following reference being used by a local community group in relation to serving new development with clean and wastewater infrastructure: *'United Utilities claim their budget will only allow provision for 30 new houses each year'*. For avoidance of doubt, United Utilities would like to take this opportunity to confirm that the reference has been taken out of context from an earlier meeting held between United Utilities and the Council. The meeting at which this was mentioned included a brief discussion on the expected average number of 30 new dwellings to be delivered per year, per site within the administrative boundaries of Sefton Council.

United Utilities acknowledges and supports the inclusion of Policy EQ8 Managing Flood Risk and Surface Water in the Draft Local Plan, in particular Point 4 of the policy which states:

‘4. Development must incorporate sustainable drainage systems to manage surface water flooding run-off within the site so that:

- a) surface water run-off rates and volumes are reduced by 20% (compared with pre-existing rates) for sites covered by buildings or impermeable hard surfaces, and for greenfield sites, do not exceed greenfield rates.*
- b) Surface water discharge to be targeted using a sequential approach, and the proposals to discharge surface water into anything other than the ground must demonstrate why the other sequentially preferable alternatives cannot be implemented:
 - i. into the ground;*
 - ii. into a watercourse or surface water body;*
 - iii. into a surface water sewer; or*
 - iv. into a combined sewer.**
- c) Above ground, natural drainage features rather than engineered or underground systems are used.*

United Utilities has reviewed the proposed allocations at each consultation stage. This review entails the identification of potential / suitable locations for the discharge of surface water for future development in the context of the surface water hierarchy set out in the above draft policy. In accordance with the objectives of Policy EQ8, United Utilities strongly recommends that all development proposals limit the use of the public sewer system for surface water to maximise the capacity of infrastructure and to most appropriately manage flood risk and the impact on the environment. In order to protect existing customers and the environment, landowners / applicants promoting land for development will be expected to adopt sustainable drainage methods. For example, discharging surface water to a watercourse at an attenuated rate (including an allowance for climate change).

The review of the proposed allocations has demonstrated that there are a number of sites that might be reliant on the public sewer network for the discharge of surface water. As applications for development are submitted, United Utilities will be requesting evidence to demonstrate that the surface water hierarchy has been applied. It is therefore imperative that we work with landowners / developers in limiting the extent of surface water entering the public sewer system.

It is important that landowners / developers contact United Utilities at the earliest opportunity to discuss the investigation of the surface water hierarchy and the production of drainage strategies. Expected timescales for the commencement and delivery of development will also assist United Utilities in its coordination of the delivery of infrastructure with new development. United Utilities welcomes early engagement with landowners and developers to discuss proposed drainage details further.

With regards to larger development sites of single or multiple ownership, United Utilities requests that landowners / developers produce drainage strategies for each phase of development in agreement with the LPA, Environment Agency and United Utilities. It will be necessary to ensure drainage infrastructure is delivered in a holistic and coordinated manner as part of an overall strategy between phases of development and between developers. The delivery of development as part of an overall strategy and the early receipt of drainage details allows the impact of development on infrastructure to be most appropriately managed as well as helping to determine the impact with improved accuracy.

Please be aware, United Utilities can only obtain a fuller understanding of the impact of water and wastewater infrastructure once more details are known such as timescales for development, approach to surface water management and chosen points of connection for both water and wastewater infrastructure. Once more information is available, which unfortunately might only be at planning application stage, we will be able to better understand the impact and the coordination required for the delivery of new or improved infrastructure. It must also be worth noting that United Utilities operates on five year investment cycle, whereas the Local Plan period is for 15 years. Very few Local Plans were adopted at the time of our submission to Ofwat (economic regulator) which sets out how we plan to invest in our infrastructure over the next 5 years. United Utilities has now commenced its Asset Management Plan for 2015-2020.

United Utilities welcomes the opportunity to discuss the above in further detail if required. For further clarification on any of the above matters, please feel free to contact Jenny Hope (LDF Planning Manager) on **01925 731 319** or alternatively United Utilities looks forward to meeting with the Local Planning Authority in due course.

Yours faithfully

Sabaa Ajaz
Planner
Developer Services and Planning
United Utilities