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Your ref	
Our ref	DC/16/1061
Date	25 April 2016

Policy
Carlisle City Council
Civic Centre
Carlisle
CA3 8QG

By Email (lpc@carlisle.gov.uk)

Dear Sir/Madam,

CARLISLE LOCAL PLAN – MAIN MODIFICATIONS CONSULTATION

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.

(Continued...)

United Utilities has previously submitted comments to earlier stages of consultation on the emerging Local Plan, and we now write to submit the following comments to the Council for consideration as part of the current 'Local Plan: Main Modifications' consultation, which runs until 5pm on Monday 25 April 2016.

GENERAL COMMENTS

We wish to highlight that United Utilities will seek to work closely with the Council during the Local Plan process to develop a coordinated approach for delivering sustainable growth. New development is most appropriately focussed 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.

SPECIFIC COMMENTS

Policy HO 1 – Housing Allocations Schedule

United Utilities has no suggested amendments to the wording of Policy HO1. However, in regards to the proposed Housing Allocations Schedule at Page 97, we wish to reiterate that our previous comments (UU Ref: DC-15-356) dated 20 April 2015 still stand.

We also note it is now proposed to enlarge the size and indicative delivery date of the following housing allocations:

- U14 – land north of Carleton Clinic, east of Cumwhinton Drive (indicative yield increased from 126 to 189 dwellings). United Utilities feels it is important to highlight that the applicant should clearly consider how surface water will be disposed of at this site. We encourage the applicant to contact United Utilities at the earliest opportunity to discuss this further so that a fuller understanding of the drainage proposals for this site can be developed including any impact on downstream private assets. In this regard, United Utilities suggests the following additional amendment to the text (highlighted in red) in appendix 1 associated with this allocation:

*“Environment Agency/Lead Local Flood Authority, United Utilities advice: potential drainage issues on site. **Applicant should avoid reliance on public sewer for surface water drainage. If discharge to surface water sewer is demonstrated to be necessary after having fully investigated the surface water hierarchy, it will be necessary to consider the impact on downstream private surface water assets as part of the planning application submission.**”*

- R15 – land north of Hill Head, Scotby (indicative yield increased from 50 to 90 dwellings). United Utilities wishes to highlight the presumption that only foul water will discharge to the public sewer in this location. At the very least, United Utilities notes the availability of a nearby watercourse. We encourage the applicant to contact United Utilities at the earliest opportunity to discuss this further. In this regard, Utilities suggests the following additional amendment to the text (highlighted in red) in appendix 1 associated with this allocation:

*“Environment Agency/Lead Local Flood Authority, United Utilities advice: potential drainage issues on site. **Applicant should avoid reliance on public sewer for surface water discharge and engage in early dialogue with***

United Utilities. The presumption will be against surface water discharge to the combined sewerage system.”

Whilst United Utilities has no further specific comments regarding the above site allocations at this time, the Council is aware from past discussions with colleagues that a fuller understanding of the impact on water and 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.

Additional information in respect of development sites is often only available at the planning application stage. With this information, 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 new development with the timing for delivery of future infrastructure improvements. This is applicable to each of the sites included within the Local Plan Housing Allocations Schedule.

Policy IP 6 – Foul Water Drainage and Development Sites

United Utilities welcomes the following proposed amendments to the wording of draft Local Plan Policy IP6 but recommends the following revisions (highlighted in red) to the wording of the policy:

~~“Development should not be permitted where inadequate foul water treatment and drainage infrastructure exists, or where such provision cannot be made within the time constraints of planning permission unless the developer can demonstrate acceptable alternative private solutions.”~~

~~Where there are concerns that inadequate foul water treatment and drainage infrastructure exists to serve a proposed development, or where such provision cannot be made within the time constraints of planning permission, it is the responsibility of the developer to demonstrate how foul drainage from the site will be managed. In some circumstances, it may be necessary to co-ordinate the delivery of development with the delivery of infrastructure. In certain circumstances, a new development will be required to discharge foul water to the public sewerage system at an attenuated rate.~~

~~Where United Utilities can demonstrate that connection to the public sewerage system is not possible, alternative on-site treatment methods and septic tanks associated with a new development will be permitted provided they are of an environmental standard to the satisfaction of the Environment Agency.~~

~~The first presumption will be for new development to drain to the public sewerage system. Where alternative on-site treatment systems are proposed, it is for the developer to demonstrate that connection to the public sewerage system is not possible in terms of cost and/or practicality and provide details of the responsibility and means of operation and management of the system for its lifetime to ensure the risk to the environment is low.”~~

All developments should ensure foul and surface waters are disposed of via separate systems.”

Policy CC 4 – Flood Risk and Development

United Utilities supports the amendment of Policy CC4, Criteria (f), as follows:

“Development should:

- 1. be supported by a Flood Risk Assessment for all proposals of 1 hectare or greater in Flood Zone 1 or in an area within Flood Zone 1 which has critical drainage problems; all proposals for new development (including minor development and changes of use) in Flood Zone 2 and 3; and where proposed development or a change of use to a more vulnerable class may be subject to other sources of flooding; to establish:*
 - f. that adequate floodplain storage capacity can be provided and that the capacity of the water supply, drainage and sewerage networks ~~can accommodate new development~~ have been considered in liaison with the relevant statutory bodies for water and wastewater, to establish the impact of development on infrastructure; and’*

Policy CC 5 – Surface Water Management and Sustainable Drainage Systems

United Utilities welcomes the inclusion of the following text after the Surface Water Hierarchy text within the body of Policy CC5:

“The approach to surface water drainage should be based on evidence of an assessment of site conditions and any surface water discharge solution should reflect the non-statutory technical standards for sustainable drainage (March 2015) or any subsequent replacement national standards. Measures intended to assist with surface water management should be made clear as part of any submission.

Where there is no alternative option but to discharge surface water to a combined sewer, applicants will need to demonstrate why there is no alternative and submit clear evidence that the discharge of surface water will be limited to an attenuated rate, including an allowance for climate change, agreed with the appropriate bodies.”

Summary

We trust the above comments will be afforded due consideration in the preparation of the emerging Local Plan. United Utilities would welcome the opportunity to meet with Carlisle City Council to discuss our response in detail.

In the meantime, if you have any queries or would like to discuss this representation, please do not hesitate to contact me.

Yours faithfully

Jenny Hope
LDF Planning Manager
Developer Services & Planning
United Utilities PLC