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Your ref	DC/15/356
Our ref	20 April 2015
Date	

Planning Services
Civic Centre
Carlisle
CA3 8QG

Dear Sir / Madam

CARLISLE DISTRICT LOCAL PLAN 2015-2030 PROPOSED SUBMISSION DRAFT

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 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.

When progressing the development plan and future policies, LPAs should consider the availability of water and wastewater infrastructure. We can most appropriately manage the impact 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.

United Utilities wishes to submit the following comments to the Council for consideration as part of the consultation process for the above-mentioned document. For ease of reference, the Council's extracted policy text is highlighted in blue, with United Utilities suggested comments highlighted in red.

Policy HO 1 Housing Strategy and Delivery

United Utilities has no suggested amendments to this policy. However, United Utilities notes the proposed allocations to the south of Wetheral which are:

- **R 19** Wetheral South, 2.2 ha, 60 dwellings, 6-10 years; and
- **R 20** Land to the west of Steele's Bank, 1.6 ha, 40 dwellings, 0-5 years.

In respect of the two proposed allocations, both site promoters have confirmed no intention to discharge surface water to the combined public sewer. This is an important fact in considering the impact of development on our infrastructure. In your consideration of the deliverability of this approach, United Utilities highlights the need for landowners / developers to secure the appropriate rights and consents to discharge surface water from the appropriate bodies / riparian owner.

With regards the proposed allocation **R19** (east of Steele's Bank), we note that there are two landowners of the land being promoted. In our response, we have assumed holistic approach to surface water drainage for land to the east.

United Utilities also notes the allocation at Kingmoor Park Harker Estate. This is:

- **R 11** Kingmoor Park Harker Estate, 10.7 ha, 300 dwellings, 6-10 years.

Given the location of this site away from the main urban area, United Utilities wishes to highlight that there may be practical issues to address in the upgrading of infrastructure. It may therefore be necessary to co-ordinate the delivery of development with the delivery of infrastructure upgrades via planning condition. It would be useful to better understand the future proposals and the timing for the delivery of development. At the current time, we would be able to most appropriately manage the impact on our infrastructure if the redevelopment of the site came forward with a lead in time for the delivery of any infrastructure upgrades that may be required.

United Utilities also notes the numerous large allocations especially around urban Carlisle, such as **U1** and **U2**. It would be helpful to better understand how all large sites, especially those in fragmented ownership, will be delivered in accordance with a co-ordinated and holistic approach to on site infrastructure, especially surface water infrastructure. This is in accordance with our below comments.

Policy 1P 6 Foul Water Drainage and Development Sites

~~'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. 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.'~~

United Utilities requests that the following policy is considered as an alternative to the above wording extracted from the consultation document. United Utilities previously requested this amendment in its response to the Preferred Options stage consultation on 8 May 2014. This amendment is requested to ensure compliance with the duties of a water and sewerage company under the Water Industry Act 1991.

'Policy IP 6 – Foul Water Drainage on Development Sites

Applicants are required to consider foul and surface water drainage arrangements in liaison with the relevant statutory bodies for wastewater to establish the impact of new development on wastewater infrastructure in advance of planning permission being granted. In some circumstances, it may be necessary to co-ordinate the delivery of development with the delivery of infrastructure. A new development will be required to discharge wastewater to the public sewerage system at an attenuated rate.

The treatment and processing of surface water is not a sustainable solution. Applicants are required to demonstrate sustainable solutions for the disposal of surface water as set out in Policy CC5.'

United Utilities requests that the justification text is amended shown below. This is to support the recommended re-wording of Policy IP 6.

Justification

~~'6.31 Foul and surface water drainage are managed through two different systems and must be considered separately. Policy IP 6 sets out the expected approach with regards to foul water drainage but should, where necessary, be read alongside Policy CC 5 which relates to surface water management. Policy IP 6 requires applicants to ensure that adequate drainage systems are in place and that sufficient capacity exists within the sewer network before development can commence~~ *the impact of development on infrastructure has been considered in liaison with the statutory sewerage undertaker.*

6.32 United Utilities is the statutory sewerage undertaker in the North West. The Council relies on feedback from them in order to ascertain whether sufficient capacity exists within the network to accommodate new development or where it may be necessary to coordinate development in line with any upgrading work. This will be dependent on detailed proposals and developers are encouraged to speak to United Utilities at the earliest opportunity.

6.33 Specific issues that may arise within the wastewater infrastructure network will also be picked up through the Infrastructure Delivery Plan; this includes identifying settlements where capacity problems have been confirmed. The Council will continue to work with United Utilities to ensure that new development does not put any unacceptable strain upon the sewer and treatment networks *the impact of development on infrastructure is appropriately managed.*

6.34 The quality of groundwater and surface waters and associated water based recreation, fisheries and nature conservation must be protected against the risk of pollution from the inadequate provision of foul water sewerage and sewage treatment facilities. Development proposals which necessitate the use of septic tanks and sewage treatment package plants may, if not designed correctly or located appropriately, result in an increased risk of pollution to groundwater and surface

waters. Such systems will only be permitted if it can be demonstrated that connections to the public sewerage system is not feasible, taking into account cost and / or practicability, and where it can be demonstrated that they accord with environmental standards.'

Policy CC 4 Flood Risk and Development

'The Council will seek to ensure that new development does not result in unacceptable flood risk or drainage problems.

Most new development should be located in Flood Zone 1 and development and development within Flood Zones 2, 3a and 3b (with the exception of water compatible uses and key infrastructure (as defined in the Planning Practice Guidance (PPG)) will only be acceptable when they are compliant with the National Planning Policy Framework (NPPF) and when the sequential test and exception test where applicable have been satisfied.

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...'

Policy CC 5 Surface Water Management and Sustainable Drainage Systems

Surface water should be managed at the source, not transferred, and discharged in the following order of priority:

1. a soakaway or some form of infiltration system (using Sustainable Urban Drainage principles; or
2. an attenuated discharge to watercourse; or
3. an attenuated discharge to surface water sewer; or as an absolute last resort
4. an attenuated discharge to combined sewer.

Measures intended to assist with surface water management, including landscaping proposals, should be made clear as part of any submission. Where Sustainable Urban Drainage Systems (SUDs) are incorporated, a drainage strategy should be submitted detailing:

1. the type of SUDs and / or measures proposed;
2. hydraulic design details / calculations;

3. *pollution prevention and water quality treatment measures together with details of pollutant removal capacity as set out in the CIRIA SUDs Manual C697 or equivalent and updated local or national design guidance; and*
4. *the proposed maintenance and management regime.*

*Applicants will need to submit clear evidence demonstrating why there is no alternative option but to discharge surface water to the **public** sewerage system. In this instance applicants will need to demonstrate that the discharge of surface water will be limited to an attenuated rate, including the allowance for climate change, agreed with the ~~sewerage company~~ **appropriate bodies**. This will be secured by planning condition or a planning obligation.*

~~*On greenfield sites, applicants will be expected to demonstrate that the likely natural discharge solution from a site once developed will be no greater than the existing discharge rates. On previously development land applicants should target a reduction in surface water discharge.*~~

United Utilities request the Council consider re-wording the final paragraph of Policy CC 5. It has been noted that this paragraph conflicts with the recently published Non-Statutory Technical Standards for Sustainable Drainage Systems (March 2015, Defra).

United Utilities welcomes the opportunity to discuss the above response in further detail if required. For further clarification on any of the above matters, please feel free to contact Sabaa Ajaz on **01925 731 378** 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