



United Utilities Water Limited
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Planning.Liaison@uuplc.co.uk

By email only: clerk@saddleworthparishcouncil.org.uk

Your ref:

Our ref:

Date: 10-JUN-24

Dear Sir / Madam

SADDLEWORTH NEIGHBOURHOOD PLAN 2024-2044 CONSULTATION

Thank you for your consultation seeking the views of United Utilities Water Limited (UUV) as part of the preparation of a Neighbourhood Plan (NP) for Saddleworth. UUV wishes to build a strong partnership with neighbourhood groups to aid sustainable development and growth.

Allocations for New Development

At this stage we note that there is no intention to allocate any sites for development. If the future NP seeks to identify new allocations for development, 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.

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

UUV 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 UUV on the detail of their design and the proposed construction works.

All UUV assets will need to be afforded due regard in the design 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 / parish council 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 UJW 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

Local Green Spaces

We note that page 21 invites anyone who wants an area to be designated as Local Green Space to contact the local planning authority or get involved in the NP. In the event that you have sites submitted to you for consideration as new local green space, we would welcome early sight so that we can provide you with our early comments.

Policy 5: Erosion and Flooding

We are supportive of Policy 5 relating to flooding. Please note that in our response to the emerging local plan for Oldham, we have recommended detailed policies on sustainable drainage and flooding. We have recommended that the local plan includes a comprehensive policy on foul and surface water management. This is reflected in the emerging Oldham Local Plan, see draft Policy CC4 – Sustainable Drainage – Foul and Surface Water. We recommend that Policy 5 cross references this emerging policy. This is because control over the management of surface water is a critical response to the challenge of climate change. Sustainable surface water management helps to control the flows and volumes of surface water that enter the public sewer and therefore this control is an inherent component of reducing flood risk and reducing the likelihood of discharges into the region's watercourses from sewer overflows.

We also recommend that the wording of Policy 5 is amended to '*flood risk from all sources*' in the first sentence. We believe this is a helpful addition to the policy and helps to remind applicants of the need to consider flood risk from a range of sources including the public sewer and reservoirs.

We also suggest that Policy 5 is expanded to reflect the unique circumstances of Saddleworth, which is characterised by many steeply sloping locations. As such, we recommend the following additional wording to Policy 5:

Any application for planning permission shall be supported by an assessment of the natural drainage patterns for the site and any existing flow paths and discharge points. The assessment shall determine how these are likely to be modified by the proposed development. The assessment shall have regard to any steep topography and ground conditions in accordance with the guidance in CIRIA C753 'The SuDS Manual' and the thereafter the development shall identify any necessary mitigating measures to protect proposed and existing properties from flood risk.

Finally, we are supportive of Recommendation 1: Flooding which recommends that efforts should be made to identify pre-existing drainage and culverted waterways, and report them to Oldham Council, to improve knowledge of existing potential flood risks. We wish to note that such information will also help the assessment of the most sustainable approach to the management of surface water and reduce reliance on the public sewer in accordance with national planning policy.

Policy 6: Sustainable Construction

UWU welcomes the references to the importance of climate change and the wider issues associated with the climate emergency in the emerging NP. A critical element of the response to climate change is sustainable surface water management and the efficient use of clean water supply.

A tighter water efficiency standard in new development has multiple benefits including a reduction in water and energy use, as well as helping to reduce customer bills. Water efficiency is therefore a key component of your journey to net zero.

At the current time, Building Regulations includes a requirement for all new dwellings to achieve a water efficiency standard of 125 litres of water per person per day (l/p/d). In 2015 an '*optional*' requirement was introduced which is currently set at 110 l/p/day for new residential development. This can be implemented through planning policy where there is a clear need based on evidence (see Housing: optional technical standards in the National Planning Practice Guidance). We have enclosed evidence to justify this approach and would be happy to further discuss the matter with you. As you will see from the evidence, we believe that the optional standard can be achieved at minimal cost. We therefore recommend that the NP includes the following water efficiency element as part of Policy 6:

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

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.'

Policy 8: Design Masterplans

We welcome Policy 8. In particular we are supportive of the need for masterplans to be in accordance with a comprehensive phasing and infrastructure delivery plan. We request that this policy includes reference to strategies for foul and sustainable surface water management.

Policy 9: Chew Brook Vale

Having regard to recent changes in national planning policy relating to flood risk, specifically the risk of flooding from reservoirs, we request that there is an additional criterion to Policy 9 which states:

The masterplan for the development must be consistent with any flood risk advice from the owner and operator of the reservoir (United Utilities) to understand the impact on them and on reservoir safety and operation in accordance with advice in the national planning practice guidance.

When looking at possible future development allocations within a reservoir flood zone, we draw your attention to the advice within the National Planning Practice Guidance on Flood Risk and Coast Change. This states that the local planning authority will need to evaluate the potential damage to buildings or loss

of life in the event of dam failure, compared to other risks, when considering development downstream of a reservoir.

Local planning authorities will also need to evaluate in Strategic Flood Risk Assessments (and when applying the Sequential Test) how an impounding reservoir will modify existing flood risk in the event of a flood in the catchment it is located within, and/or whether emergency draw-down of the reservoir will add to the extent of flooding.

When allocating land for development within a reservoir flood zone, local planning authorities should now discuss their proposed site allocations with reservoir undertakers (such as U UW) at the earliest opportunity, in order to:

- avoid intensification of development within areas at risk from reservoir failure; and
- ensure that reservoir undertakers can assess the cost implications of any reservoir safety improvements required due to changes in land use downstream of their assets.

Developers should be expected to cover any additional costs incurred, as required by the National Planning Policy Framework's 'agent of change' policy (paragraph 193). This could be through Community Infrastructure Levy or section 106 obligations for example.

Policy 15: Community and Self Build

We request that a further criterion is added to this policy, which identifies the need for community and self-build development to be in accordance with site-wide strategic for on-site infrastructure. This ensures that individual plots on self-build sites are not delivered in a fragmented and uncoordinated manner. We recommend the following wording:

- *are supported by, and constructed in accordance with, site-wide strategies for on-site infrastructure. Fragmented approaches to on-site infrastructure delivery will not be acceptable on self-build / community sites.*

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

Andrew Leyssens
Planning, Landscape and Ecology
United Utilities Water Limited

Enc. Water Efficiency Evidence