From: Philip Dagnall

To: Core 19

Subject: Ribble Valley BC - Core Strategy Publication Version [DC/12/1974]

Attachments: Ribble Valley - Core Strategy DC_12_1974.zip

Dear Sir or Madam

Thank you for your consultation and seeking the views of United Utilities PLC in this process.

Below is summary of United Utilities PLC's response; the Council must read the specific comments in conjunction with the attached covering letter and not extract/use the specific and/or summary comments in isolation.

Summary

Water and wastewater services are vital for the future health and well-being of your community and the protection of the environment. When developing your Local Development Framework (LDF) and future policies LPA should consider the impacts on the health and well-being and necessarily the environment and ensure infrastructure capacity is available. If infrastructure deficiencies cannot be addressed, an alternative location and/or timescale should be sought where infrastructure capacity is available and it meets the LPA development needs.

Recent flooding and drought events should highlight to the Council the importance of managing flood risk and water resources; and their long-term impacts on the community; its health; well-being and its prosperity.

Several water companies have announced drought measures highlighting the need to manage water resources effectively, given increasing pressure on water supply because of population increase, changing household usage patterns and by climate change. All this despite the UK having a reputation as being a rainy country, we may face a future with less rainfall and less certainty about when that rain will fall.

Inappropriate development could result in the blocking of a hospital and/or school etc., due to the inappropriate development or siphoning off the historical water or wastewater infrastructure capacity; no water supply for washing and catering facilities and/or sewerage flooding of the property/highway.

United Utilities PLC would seek the support of the Council in the LDF and planning application processes to protect/secure land for infrastructure use. Failure could mean United Utilities PLC cannot provide the additional capacity required to support your growth plans therefore a failed and/or undeliverable development plan.

In considering any application for planning permission, the LPA and/or the applicant must demonstrate that infrastructure capacity is available to serve the proposal. If capacity is not available, the application should not be approved.

Specific comments


LPA should adopt proactive strategy priorities in their Local Plan. This should include strategic policies to deliver:

• the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
• the provision of health, security, community and cultural infrastructure and other local facilities; and
• climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.

Crucially, Local Plans should:

• plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of the Framework;
• be drawn up over an appropriate time scale, preferably a 15-year time horizon, take account of longer term requirements, and be kept up to date;
• be based on co-operation with neighbouring authorities, public, voluntary and private sector organisations;
• indicate broad locations for strategic development on a key diagram and land-use designations on a proposals map;
• allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate;
• identify areas where it may be necessary to limit freedom to change the uses of buildings, and support such restrictions with a clear explanation;
• identify land where development would be inappropriate, for instance because of its environmental or historic significance; and
• contain a clear strategy for enhancing the natural, built and historic environment, and supporting Nature Improvement Areas where they have been identified.

United Utilities PLC does not agree the current Draft Core Strategy is consistent with national policy, and therefore the current version is not sound, justifiable and/or effective.

Examples:

The current policies are weak in that they do specify limits and measures for delivery of future sustainable development and/or protect the existing infrastructure, the service it provides to the existing community, their quality of life and the protection it provides to the environment.
Text and references such as 'unacceptable', 'appropriate' and/or 'reducing' should be replaced with measures that are specific, measurable, achievable, realistic and timely.

How do you define the unacceptable risk of flooding, a victim should say any flooding is unacceptable.

Insufficient information is available on the location, scale, phasing of development, therefore limited data is available to identify, and delivery the appropriate supporting infrastructure, which may then lead to conflicts for future planning applications.

To resolve this and to ensure future developments are deemed sustainable, plan-led and co-ordinated, strategic solutions should be developed and defined for supporting infrastructure [delivered at the right time location and scale to meeting the needs of the existing community, short-term development (2008-2028) and future generations].

An example would be the development of a joint working group [lead by the LPA] that identifies a strategic drainage solution/s for known capacity issues, key sites and/or strategic locations.

The joint working group will include the LPA; EA; infrastructure providers; developers; landowners and any other key stakeholders such as Natural England etc.

The aim of the joint working group will be to develop a sustainable strategic drainage solution that:
- protects the existing customer and maintains their service and quality of life
- protects the environment
- is a robust and deliverable
- is reactive not reactive delivered
- meets the needs of the existing community, short-term development (2008-2028) and future generations of Ribble Valley Borough Council
  but also neighbouring councils
- co-ordinated with neighbouring authorities
- is conditional for all future developments
- development is co-ordinated and phasing

The current policies do not consider and/or reflect the United Utilities PLC’s historical comments in protecting the existing infrastructure, the service it provides to the existing community, their quality of life and the protection it provides to the environment, United Utilities PLC requested the following policy:
- No surface water is to discharge directly and/or indirectly into the public foul and/or combined sewage network
- United Utilities PLC will determine the location of the foul connection points and their discharge rates. It is essential that this is defined within the Councils’ planning policy documents and planning application conditions.

Reinforcement of the public sewage and water supply network may be required before a live connection is made to public assets; phasing of development will be essential if reinforcement is necessary.

If you require any further information, please do not hesitate in contacting me.

Regards

1.4 million Children die every year from diarrhoea caused by unclean water and poor sanitation - 4,000 child deaths a day or one child every 10 seconds. This equates to 100 mrent school classrooms lost every single day to an entirely preventable public health crisis [WHO/WaterAid]
Dear Sir or Madam

Proposal: Ribble Valley BC ~ Core Strategy Publication Version

Thank you for your consultation and seeking the views of United Utilities PLC in this process.

United Utilities PLC supports growth and sustainable development within the North West.

United Utilities PLC would like to build a strong partnership with Local Planning Authorities [LPA] to aid sustainable development and growth.

Our aim is to proactively share our information; assist in the development of sound planning strategies, to identify future development needs and to secure the necessary long-term infrastructure investment.

Water and wastewater services are vital for the future health and well-being of your community and the protection of the environment. When developing your Local Development Framework [LDF] and future policies LPA should consider the impacts on the health and well-being its community, environment and ensure infrastructure capacity is available. If infrastructure deficiencies cannot be addressed, an alternative location and/or timescale should be sought where infrastructure capacity is available and it meets the LPA development needs.

Inappropriate development could result in the closing of a hospital and/or school etc, due to the inappropriate development siphoning off the historical water or wastewater infrastructure capacity; no water supply for washing and catering facilities and/or sewerage flooding of the property/highway.
United Utilities PLC would like to make the following specific comments, to be included in further consultations and if possible, the development of Ribble Valley Borough Council’s [Council] future sustained economic growth plans and polices.

Specific comments

LPA should adopt proactive strategy priorities in their Local Plan. This should include strategic policies to deliver:
- the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
- the provision of health, security, community and cultural infrastructure and other local facilities; and
- climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.

Crucially, Local Plans should:
- plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of the Framework;
- be drawn up over an appropriate time scale, preferably a 15-year time horizon, take account of longer term requirements, and be kept up to date;
- be based on co-operation with neighbouring authorities, public, voluntary and private sector organisations;
- indicate broad locations for strategic development on a key diagram and land-use designations on a proposals map;
- allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate;
- identify areas where it may be necessary to limit freedom to change the uses of buildings, and support such restrictions with a clear explanation;
- identify land where development would be inappropriate, for instance because of its environmental or historic significance; and
- contain a clear strategy for enhancing the natural, built and historic environment, and supporting Nature Improvement Areas where they have been identified.

United Utilities PLC does not agree the current Draft Core Strategy is consistent with national policy, and therefore the current version is not sound, justified and/or effective.

Examples:
The current polices are weak in that they do specify limits and measures for delivery of future sustainable development and/or protect the existing infrastructure, the service it provides to the existing community, their quality of life and the protection it provides to the environment.

Text and references such as ‘unacceptable’; ‘appropriate’ and/or ‘reducing’ should be replaced with measures that are specific, measurable, achievable, realistic and timely.

How do you define the unacceptable risk of flooding, a victim should say any flooding is unacceptable.
Insufficient information is available on the location, scale, phasing of development, therefore limited data is available to identify, and delivery the appropriate supporting infrastructure, which may then lead to conflicts for future planning applications.

To resolve this and to ensure future developments are deemed sustainable, plan-led and co-ordinated, strategic solutions should be developed and defined for supporting infrastructure [delivered at the right time location and scale to meeting the needs of the existing community, short-term development 2008-2028 and future generations].

An example would be the development of a joint working group [lead by the LPA] that identifies a strategic drainage solution/s for known capacity issues, key sites and/or strategic locations.

The joint working group will include the LPA; EA; infrastructure providers; developers; landowners and any other key stakeholders such as Natural England etc.

The aim of the joint working group will be to develop a sustainable strategic drainage solution that:
- protects the existing customer and maintains their service and quality of life
- protects the environment
- is a robust and deliverable
- proactively not reactively delivered
- meets the needs of the existing community, short-term development [2008-2028] and future generations of Ribble Valley Borough Council but also neighbouring councils
- co-ordinated with neighbouring authorities
- is conditional for all future developments
- development is co-ordinated and phasing

The current policies do not consider and/or reflect the United Utilities PLC’s historical comments in protecting the existing infrastructure, the service it provides to the existing community, their quality of life and the protection it provides to the environment, United Utilities PLC requested the following policy:
- No surface water is to discharge directly and/or indirectly into the public foul and/or combined sewerage network
- United Utilities PLC will determine the location of the foul connection points and their discharge rates. It is essential that this is defined within the Councils’ planning policy documents and planning application conditions.
- Reinforcement of the public sewerage and water supply network may be required before a live connection is made to public assets; phasing of development will be essential if reinforcement is necessary.

The Council needs to read the specific comments in conjunction with the following remarks and not extract/use the specific comments in isolation.

United Utilities PLC would like these to be taken into consideration and incorporated into your future policies and/or documents:
General notes:

Infrastructure
Framework 162. Local planning authorities should work with other authorities and providers to:
- assess the quality and capacity of infrastructure for transport, water supply, wastewater and its treatment, energy (including heat), telecommunications, utilities, waste, health, social care, education, flood risk and coastal change management, and its ability to meet forecast demands; and
- take account of the need for strategic infrastructure including nationally significant infrastructure within their areas.

To ensure that future development is sustainable; prevents environmental damage and preserves the quality of life for the existing and future generations, developments should not be permitted until infrastructure capacity is available.

United Utilities PLC cannot confirm if capacity is available until the connection point/s, flows and completion dates are available.

If additional supporting infrastructure is required then the LPA should work closely with United Utilities PLC [and other utility providers] to ensure a sustainable cross-boundary solution is identified and approved by the appropriate Regulators bodies before granting planning approval; failure may result in the deterioration of the community’s quality of life and/or environmental damage.

The scale and type of development needs to be defined so the appropriate infrastructure is in place to ensure growth is sustainable.

United Utilities PLC has a number of recent examples where infrastructure has been provided based on identified growth, but not delivered; this has resulted in major operational issues; the treatment process is under loaded; it is failing to operate because it cannot reach its operational capacity.

Additional temporary engineer solutions are in place; this represents a significant risk to the exiting customers; the environment and United Utilities PLC; not forgetting the additional financial burden on United Utilities PLC’s customers.

The Council has a number of capacity issues; any additional developments in these and/or adjoining areas without firstly ensuring infrastructure solutions are implemented could result in an increased number and frequency of sewer flooding incidents.

The Council should also consider the constraints [are not limited to, but include] that are outside the control of United Utilities PLC and may influence the timely delivery of supporting infrastructure:
- Regulatory approval
- Environmental constraints
  - Does the receiving watercourse/environment have the capacity to accept additional flows without causing environmental damage?
  - Small river : large development
- Environmental consents and permits
- Timescales in involved in the construction/delivery of new processes to meet new consents and/or permits

- Planning approval
  - The LDF process has not highlighted and/or specified land for infrastructure use, therefore future planning applications for future supporting utilities infrastructure may be thwarted or a prolonged process
  - Historical local resistance to the expansion of utilities assets
  - Planning application approval restrictions/conditions delay implementation of supporting infrastructure assets

- Land acquisition
  - Timescales involved in the purchased land needs
  - Land may not be available for expansion due to the encroachment of development

- Access into the highway
  - Limitations from the highway departments for road works

- Environmental restrictions
  - Bird breeding and/or nesting seasons; great crested newts; badgers etc

- Implementation and commissioning restrictions
  - Planning application approval conditions; working hours etc.
  - Environmental consents/permits conditions
  - Its psychological delivery

[Reason: Ensure timely delivery of development and infrastructure to protect the good quality of life and the environment]

**Surface Water**
Site drainage should be a major consideration for LPA and developers when selecting possible development sites; ground conditions; local flooding issues; development layout; design and planning policy.

The treatment and processing of surface water [storm water; rainwater] is a not a sustainable solution; the sites’ current natural discharge solution should be continued and/or mimicked; if the existing surface water does not have an existing natural solution, United Utilities PLC questions the development of a flooded site.

Surface water should be managed at source and not transferred; if not this will only transfer the issue to another location; generally to a single pinch point, generating further problems in that location.

Developments must drain on a separate sewerage system, with only foul drainage connected into the foul sewerage network.

Every option should be investigated before discharging surface water into a public sewerage network.

Connecting surface water to the public sewerage network is not a sustainable solution and LPA should discourage this practice.

The priority options for the management of surface water discharges are:
- Continue and/or mimic the site’s current natural discharge process
- Store for later use
- Discharge into infiltration systems located in porous sub soils
• Attenuate flows into green engineering solutions such as ponds; swales or other open water features for gradual release to a watercourse and/or porous sub soils
• Attenuate by storing in tanks or sealed systems for gradual release to a watercourse
• Direct discharge to a watercourse
• Direct discharge to a surface water sewer

Development on greenfield sites shall not discharge surface water into the public combined sewerage network and shall not increase the rate of run-off into the public surface water network ~ this statement does not replace the priority options for surface water management above.

On previously developed land, a reduction of at least 30% will be sought, rising to a minimum of 50% in critical drainage areas ~ this statement does not replace the priority options for surface water management above.

Any discharge to the public sewerage system must be via approved SuDS and will require an approved discharge rate.

Consideration should be given for green infrastructure, low carbon, soft engineering SuDS solutions, such as ponds; swales; wet land areas and detention basins etc.

http://www.ciria.com/suds/index.html

A discharge to groundwater or watercourse may require the consent of the Environment Agency.

[Reason: To ensure that the surface water is properly discharged to prevent flooding or the overloading of the public sewerage network]

Green Infrastructure
The Council should seek opportunities to use developer financial and/or resources contributions to meet common objectives.

Use green and open spaces, sports and recreation facilities to address surface water and climate change issues.

Building green infrastructure assets such as ponds, swales and wetlands will not only meet the Council’s Green Space needs but also their local existing and/or future surface water/ climate change issues.

Artificial pitches; cycle paths; play areas multi-use games areas and skate parks can be used to local underground civil engineering SuDS solutions.
SuDS solutions that incorporate irrigation systems will help support and maintain the Council’s allotments, parks and garden areas.

The Council’s should identify opportunities for the installation retro fitting SuDS.

[Reason: To ensure that the development is sustainable, properly drained; prevents flooding and environmental damage]
Climate change adaptation
Climate change is a major consideration on the future available capacity of sewerage networks; wastewater treatment works and watercourses.

Planners and Developers should consider that the impacts of climate change on future development, existing infrastructures, and the environment.

Developments to be designed to reduce the impacts of climatic change on the development itself, the existing infrastructure and the environment; with consideration for hotter, drier summers, greater flood risk and more severe weather events.

To reduce the impacts of climate change on the existing infrastructure LPA should seek a significant reduction in the discharge from developments.

Urban creep has a significant impact on capacity; the paving over of gardens contributes to flood risk and should therefore be discouraged.

[Reason: To ensure that the development is properly drained; prevents flooding and environmental damage]

Water Resources Planning
On 12 March 2012, seven water companies [Anglian Water, South East Water, Southern Water, Sutton and East Surrey Water, Thames Water, Veolia Water Southeast and Veolia Water Central] announced they are consulting on temporary restrictions to be in place by 5 April 2012.

The number of drought measures highlights the need to manage water resources effectively, given increasing pressure on water supply because of population increase, changing household usage patterns and by climate change.

All this despite the UK having a reputation as being a rainy country, we may face a future with less rainfall and less certainty about when that rain will fall.

United Utilities PLC’s Water Resources Management Plan published in 2009, sets out our strategy for water resources management for the next twenty-five years and highlights areas where there is likely to be a supply deficit and what activities will be put in place to mitigate any shortfall in supply.

The plan can be accessed here:


United Utilities PLC would encourage all developers and planners to contact United Utilities PLC at the earliest opportunity to enable identification of points of connection with least cost to the developer.

[Reason: To maintain the public water supply and to provide satisfactory/sustainable development]
Increased Water Capacity
The developer is required to pay for their increased capacity (up to the point of a treatment works) and they are only allowed to connect at specific points identified by United Utilities PLC and following approval to connect.

Planners and Developer should obtain local capacity information from the United Utilities PLC Area Teams\Connections who would be able to identify areas where there is current capacity for development; this would be on a case by case basis and developers are required to pay a fee for this service (a pre development enquiry).

[Reason: To maintain the public water supply and to provide satisfactory/sustainable development]

General Water Efficiency Guidance
United Utilities encourages the use of water efficient designs and development wherever this is possible. There are a number of actions developers can undertake to ensure that their developments are water efficient. The most up to date advice for water efficiency and water efficiency products can be found at Waterwise who have recently published a best practise guide on water efficiency for new developments.

United Utilities PLC would encourage utilisation of the following water efficiency activities:
- Installing of the latest water efficient products, such as a 4.5l flush toilet instead of the 6l type.
- Minimise run lengths of hot and cold water pipes from storage to tap/shower areas. This minimises the amount of waste during the time the water goes from cold to hot.
- Utilising drought resistant varieties of trees, plants and grasses when landscaping.
- Install water efficient appliances such as dishwashers, washing machines.

[Reason: To maintain the public water supply and to provide satisfactory/sustainable development]

Responding Strategic Housing Land Availability Assessment [SHLAA]
Responding to an individual site identified in a SHLAA will not give a true reflection on impact on the existing infrastructure or provide a clear investment plan for the future.

A single plot will not be constructed, a number of plots will and therefore numerous build scenarios can be created from the list of sites identified in a SHLAA.

What if:
Plots A, B, C and Z are constructed
Or
Plots B; C; D; Y and Z are constructed.

United Utilities PLC can not provide a true impact assessment on the development plots identified in your SHLAA, United Utilities PLC would prefer to meet a member of your team to discuss this in further detail.
[Reason: To ensure that no foul or surface water discharges take place until proper provision has been made for their disposal and to provide satisfactory/sustainable development]

Development adjacent to infrastructure assets
The future expansion of infrastructure assets to meet the needs of future development and changes in legalisation could create a potential conflict with development plans, this may result in £Millions of customers money being spent in building a new infrastructure outside the locality; therefore developments adjacent to United Utilities PLC assets should be discouraged by LPA.

Water and sewerage companies have a legal right of access to their assets; this can be for their operational and/or maintenance therefore United Utilities PLC will not permit the building over and/or near its infrastructure assets.

By their nature, wastewater processes generate odour levels, which the public may deem to be unacceptable; in addition, the filter processes attract flies.

To avoid any conflict historically these facilities have been sited away from the general population.

To protect the public from these by-products United Utilities PLC would ask that the Environmental Health Authority be consulted in any future developments adjacent to wastewater infrastructure assets. In most cases, the distance of 400 metres from the WWTW is used as a guide, but this can differ due to local topography, climatic conditions, size and nature of the wastewater infrastructure asset and development in question.

The Council must ensure United Utilities PLC is kept informed of any waste management related development and/or planning application within 500m of a Large Diameter Trunk Main (LDTM). Prior consent will be required from United Utilities PLC before granting approval. It is also essential that this information is included in future planning policy.

United Utilities PLC would seek the support of LPA in the LDF and planning application processes to protect/secure land for infrastructure use. Failure could mean United Utilities PLC cannot provide the additional capacity required to support your growth plans therefore a failed and/or unsound development plan.

[Reason: To protect existing and future infrastructure and maintain service]

Infill land
You should be aware that, on occasion, gaps are left between properties; this is due to the presence of underground utility assets. United Utilities PLC will not allow the building over or near to these assets and development will not be acceptable in these locations.

[Reason: In order to allow sufficient access for maintenance and repair work at all times]
Carbon impact
LPA and developers should consider to the total carbon impact of future developments; not only the footprint of the development but also the carbon impact for additional infrastructure assets; their associated treatment processes and their future maintenance and operation requirements. To meet future reduction targets LPA and Developers should considered the wider carbon impact when determining the location of future developments.

[Reason: Satisfactory and sustainable development]

Windfall Sites
Windfall sites siphon investment and resources away from defined development plans; sabotaging infrastructure investment identified to address specific water and wastewater infrastructure needs.

For LPA this could greatly impact their development plans to address areas of deprivation; poor housing; high unemployment; education and health care issues.

A single development site [windfall] must not impair and/or sabotage the time; resources; infrastructure investment and partnerships developed to support the future growth of a LPA and/or number of LPAs.

[Reason: Protect investment, well being of the community and deliver sustainable development]

Greenfield Development
Generally green field sites have limited or no supporting water supply and/or sewerage infrastructure assets; they may be adjacent to existing infrastructure assets that are located on the fringe/limits of the existing water supply and/or sewerage infrastructure networks which are of a small diameter and have limited capacity to support additional capacity.

Providing supporting infrastructure to greenfield development sites could result in the up-sizing of the existing assets to support the additional capacity needs; therefore disrupting to the existing community, which would see little or no benefit for their reduced quality of life during the construction, and commissioning phases.

The existing community and new residents may also experience a reduced quality of service until the new supporting infrastructure is commissioned.

[Reason: To protect the quality of life for the existing community by protecting and maintaining the public water supply and sewerage services and to provide satisfactory/sustainable development]

LIABILITY
United Utilities PLC does not promise that the data will provide any particular facilities or functions. You must ensure that the data meet your needs. You are entirely responsible for the consequences of any use of the data, United Utilities PLC give you no warranty about the fitness for purpose or performance of any part of the data.
If an electronic format has been used, United Utilities PLC do not promise that the media on which the data are provided will always be free from defects, computer viruses, software locks or other similar code or that the operation of the data will be uninterrupted or error-free. You should carry out all necessary virus checks prior to loading the data on to your computer system.

United Utilities PLC does not guarantee that the data will always be accurate, correct, complete, up to date or valid. United Utilities PLC gives you no warranty about the condition or satisfactory quality of any part of the Data.

United Utilities PLC is only able to undertake to use reasonable endeavours to ensure that United Utilities PLC is providing you with an accurate a copy from our records.

United Utilities PLC are not in any circumstances (including if United Utilities PLC have been negligent) liable for any damage to property, loss of business capital, earnings, profit, reputation, goodwill or enjoyment or any other indirect or consequential loss or damage at all arising out of or in connection with this Agreement or its subject matter.

You accept that United Utilities PLC shall not be under any liability to you of any kind, which arising directly or indirectly, for any conditions, warranties, undertakings or representations of any kind, express or implied, statutory or otherwise, relating to the data.

Yours Sincerely

[Signature]
Local Development Framework Lead
Developer Services & Asset Protection Team
United Utilities PLC