

APPENDIX B – NEIGHBOURHOOD PLAN AREA CONSULTATION RESPONSES



The Coal
Authority

Wigan - Standish Neighbourhood Development Plan (Neighbourhood Forum and Area Designation Application)

Consultation Deadline – 26 March 2015

Contact Details

Planning and Local Authority Liaison Department
The Coal Authority
200 Lichfield Lane
Berry Hill
MANSFIELD
Nottinghamshire
NG18 4RG

Planning Email: planningconsultation@coal.gov.uk
Planning Enquiries: 01623 637 119

Person Making Comments

Anthony B Northcote *HNCert LA(P), Dip TP, PgDip URP, MA, FGS, ICIOB, MInstLM, MCMI, MRTPI*
Consultant Planning Advisor to The Coal Authority

Date of Response

25 February 2015

Thank you for the notification of the 12 February 2015 consulting The Coal Authority on the above

The Coal Authority is a non-departmental public body which works to protect the public and the environment in coal mining areas. Our statutory role in the planning system is to provide advice about new development in the coalfield areas and also protect coal resources from unnecessary sterilisation by encouraging their extraction, where practical, prior to the permanent surface development commencing.

As you will be aware the proposed neighbourhood area lies within the current defined coalfield. However as this consultation only relates to the proposed designation of the neighbourhood plan area, The Coal Authority has **no specific comments** to make at this stage.

Whilst this is acknowledged this consultation only relates to the proposed area for a Neighbourhood Plan, it is the first opportunity to draw attention to the following facts, which we will reiterate at future consultation stages as necessary.

According to the Coal Authority Development High Risk Area Plans for Wigan, there are recorded risks from past coal mining activity in the form of 89 mine entries, recorded shallow coal workings, unrecorded probable historic shallow coal workings, thick coal outcrops, past surface mining and 11 reported hazards have been reported to The Coal Authority. The mining legacy extends across most of the proposed area, including much of the built up areas.

If the Neighbourhood Plan allocates sites for future development in these areas then consideration as to the development will need to respond to these risks to surface stability in accordance with the National Planning Policy Framework and the Wigan Development Plan.

In accordance with the Neighbourhood Planning (General) Regulations 2012 please continue to consult The Coal Authority on planning matters using the specific email address of planningconsultation@coal.gov.uk.

R. A. Bust

Miss Rachael A. Bust *B.Sc.(Hons), MA, M.Sc., LL.M., AMIEnvSci., MInstLM, MCMI, MRTPI*
Chief Planner / Principal Manager

Wigan Metropolitan Borough Council
Planning Policy
Civic Buildings (4) New Market Street
Wigan
Lancashire
WN1 1RP

Our ref: SO/2006/000257/OR-
07/IS1-L01

Your ref:

Date: 26 March 2015

Dear Sir/Madam

**CONSULTATION ON THE PROPOSED STANDISH NEIGHBOURHOOD AREA
AND NEIGHBOURHOOD FORUM
STANDISH VOICE**

Thank you for referring the above consultation to the Environment Agency for comment.

Environment Agency Position

We can confirm that we have no comments to make with regards to the proposed neighbourhood area or neighbourhood forum.

The Environment Agency, together with English Heritage, Natural England and the Forestry Commission has published joint advice on neighbourhood planning. The advice provides sources of environmental information and ideas on incorporating the environment into neighbourhood plans. The link to this document is below:

http://webarchive.nationalarchives.gov.uk/20140328084622/http://cdn.environment-agency.gov.uk/LIT_6524_7da381.pdf

Should the neighbourhood area and forum receive designation, we will be pleased to provide further advice on environmental issues as part of any development of a neighbourhood plan.

Yours faithfully

Helen Telfer
Planning Liaison Officer

Direct dial 01925 542525

Direct fax 01925 415961

Direct e-mail helen.telfer@environment-agency.gov.uk

Environment Agency
Richard Fairclough House Knutsford Road, Warrington, WA4 1HT.
Customer services line: 03708 506 506
www.gov.uk/environment-agency

End



ENGLISH HERITAGE
NORTH WEST

By email: planningpolicy@wigan.gov.uk

Our Ref: 1633

Your Ref:

Date:23/2/15

Dear Sirs,

CONSULTATION – PROPOSED STANDISH NEIGHBOURHOOD AREA AND
NEIGHBOURHOOD FORUM – STANDISH VOICE

Thank you for consulting English Heritage, on this occasion we have no comment to make on the application to designate a Neighbourhood Plan Area, we do not need to be consulted at future stages unless the developing plan proposes significant impacts or changes in relation to designated heritage assets or their setting that would require statutory notification to English Heritage by virtue of government notification procedures, See <http://planningguidance.planningportal.gov.uk/blog/guidance/conserving-and-enhancing-the-historic-environment/consultation-and-notification-requirements-for-heritage-related-applications/>

By way of guidance:

Evidence Base

The National Planning Policy Framework must be taken into account in the preparation of neighbourhood plans, and is a material consideration in planning decisions

The neighbourhood plan should be based on an up-to-date evidence base which includes reference to the historic environment. The evidence base needs to identify:

- What contribution the historic environment makes to the character of the area, to its economic well-being and to the quality of life of its communities.
- What issues and challenges is it facing and likely to be facing in the future;
- What opportunities the historic environment offers for helping to deliver the other objectives in the Plan area.

When undertaking this exercise, it is important to bear in mind that it is not simply an exercise in listing known sites but, rather understanding their value to society (i.e. their significance). There is a need to identify the subtle qualities of the area and its local distinctiveness and character which can easily be lost. There will need to be an assessment of the likelihood of currently unidentified heritage assets including sites of historic and archaeological interest being discovered in the future. It may also be necessary to identify heritage assets outside the area where there are likely to be setting impacts caused by any development proposals put forward in the area. It is also important to bear in mind that some asset types are not currently well recorded. For example, the Register of Parks and Gardens of Historic Interest in England, is thought to represent only around two thirds of sites potentially deserving inclusion. Evidence gathering can also help to identify parts of a locality that may be worthy of designation as a conservation area and identify assets that are worthy of inclusion in a local list.

Potential sources of evidence include:

- National Heritage List for England
- Historic Environment Record
- Conservation Area Appraisals and Management Plans

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available

- Local Lists
- National and Local Heritage At Risk Registers
- Historic Characterisation Assessments
- World Heritage Site Management Plans
- In house and local knowledge expertise

Where the evidence base is weak, there will be a need to commission additional work to ensure that the historic environment is adequately dealt with and can be used to inform the Plan.

Spatial Portrait

The Neighbourhood Plan should include a proper description and assessment of the historic environment and the contribution it makes to the area (NPPF, Paragraph 169). The Plan needs to describe the historical growth of the area and identify its historic environment. It should also clearly identify the character and identity and the contribution it makes to life in the area.

Plan Policies

One of the twelve principal objectives of planning under the NPPF is the conservation of heritage assets for the quality of life they bring to this and future generations (NPPF, Paragraph 17). Conservation means maintaining what is important about a place and improving this where it is desirable. It is not a passive exercise. It requires a Plan for the maintenance and use of heritage assets and for the delivery of development within their setting that will make a positive contribution to local character and distinctiveness.

Neighbourhood Plans should include policies that will conserve and enhance the historic environment of the area and to guide how the presumption in favour of sustainable development should be applied locally. It is vital to include strategic policies for the historic environment as they will be the starting point for decisions on planning applications and Neighbourhood Plans are required to be in general conformity with the strategic policies of the Local Plan.

The strategic policies for the historic environment will derive from the overall strategy to deliver conservation and enjoyment of the area's heritage assets for generations to come. These may be policies that concern themselves specifically with the development of types of heritage asset. But delivery of the NPPF objective may also require strategic policies on use, design of new development, transport layout and so on. Indeed every aspect of planning, conceivably can make a contribution to conservation. Plan policies in all topics should be assessed for their impact on the strategic conservation objective.

Conservation is not a standalone exercise satisfied by standalone policies that repeat the NPPF objectives. The Local Plan should also consider the role which the historic environment can play in delivering other planning objectives:

- Building a strong, competitive economy
- Ensuring the vitality of town centres
- Supporting a prosperous rural economy
- Promoting sustainable transport
- Supporting high quality communication infrastructure
- Delivering a wide choice of high quality homes
- Requiring good design
- Protecting green belt land
- Meeting the challenge of climate change, flooding and coastal change
- Conserving and enhancing the natural environment
- Facilitating the sustainable use of minerals

In formulating the strategy it is advisable and often necessary to consider the following factors:

- How the historic environment can assist in the delivery of the vision and the economic, social and environmental objectives for the plan area;
- How the Plan will address particular issues identified during the development of the evidence base including heritage at risk;
- The interrelationship between the conservation and enhancement of the historic environment and the other Plans policies and objectives;
- The means by which new development in conservation areas and within the setting of heritage assets might enhance or better reveal their significance;
- How local lists might assist in identifying and managing the conservation on non-designated heritage assets;
- How the archaeology of the Plan area might be managed;
- How CIL funding might contribute towards ensuring a sustainable future for individual assets or specific historic places and whether or not certain heritage assets might need to be identified;
- Whether masterplans or design briefs need to be prepared for significant sites where major change is proposed;
- What implementation partners need to be identified in order to deliver the positive strategy;

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- What indicators should be used to monitor the effectiveness of the strategy.

Development Management Policies

In terms of development management policies, it is clear that the NPPF expects plans to include detailed policies, which will enable a decision maker to determine a planning application.

Where the Neighbourhood Plan includes development management policies for the historic environment they should help inform decisions that affect it and others should where possible cross-reference heritage related issues.

Key issues to be considered are (not wholly comprehensive):

- Undesignated heritage assets (including significance of, setting, extensions, demolition, alterations, change of use, etc).
- Designated heritage assets (including significance of, setting, extensions, demolition, alterations, change of use, etc).
- Archaeology including remains of less than national importance.
- Conservation areas
- Registered parks and gardens
- Heritage at Risk
- Important views and vistas
- Landscape character
- Local character and distinctiveness
- Individual settlements
- Historic shopfronts and advertisements
- Public realm
- Design
- Information to accompany an application.

Strategic Cross Boundary Issues

Strategic cross boundary issues that affect the historic environment are issues that can only be effectively addressed at a larger than local scale and may cover the issues listed below; this is not an exclusive list and strategic issues will have to be considered on an area by area basis.

- extensive designated and non-designated heritage assets, e.g. World Heritage Sites, historic landscapes,
- major heritage based tourism attractions, the management of which may impact upon more than one Authority
- major quarries for building and roofing stone, e.g. Portland stone
- major changes to green belt which affect the preservation of the setting and character of historic towns
- major development proposals likely to affect important heritage assets in a neighbouring authority, e.g. major urban extensions, infrastructure proposals

These strategic issues will not necessarily and always be the same as the strategic policies for the protection and enhancement of the historic environment included in a local plan but are likely to be a sub-set of them. Indeed local circumstances may indicate that strategic approaches may not always be needed.

Site Allocations

The NPPF makes it clear that the significance of heritage assets can be harmed through development within their setting. There is a requirement in the Town and Country Planning Act 1990 that 'special regard' should be had to the desirability of preserving listed buildings, their setting or any features of special architectural or historic interest which they possess. It is also the duty of the Council to preserve or enhance the character or appearance of its conservation areas and their setting. Where potential development sites appear to include non-designated assets including the possibility for archaeology, their potential should be investigated and retention/exploration should be promoted.

Consequently, before allocating any site there would need to be some evaluation of the impact, which the development might have upon those elements that contribute to the significance of a heritage asset including their setting, through undertaking a heritage impact assessment. The assessment of the sites needs to address the central issue of whether or not the principle of development and loss of any open space is acceptable. It needs to evaluate:

1. What contribution the site in its current form makes to those elements which contribute to the significance of the heritage assets. For a number of these heritage assets, it might be the case that the site makes very little or no contribution.
2. What impact the loss of the area and its subsequent development might have upon those elements which contribute to the significance of those heritage assets.
3. If it is likely to result in harm, how might that harm be removed or reduced to an acceptable level.

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4. If the harm cannot be reduced or removed, what are the public benefits that outweigh the presumption in favour of the conservation of the heritage asset?

The selection of sites for development needs to be informed by an up-to-date evidence base and the Plan should avoid allocating those sites which are likely to result in harm to the significance of the heritage assets of the Plan area. Where adverse impacts are unavoidable, the Plan should consider how any harm might be mitigated. This could include measures such as a reduction of the quantum of development at a site, amending the types of development proposed or locating the development within another part of the site allocation. Such initiatives need to be fully justified and evidenced to ensure that such measures are successful in reducing identified harm.

The allocation of sites for development may also present better opportunities for the historic environment. For example, new development may better reveal the significance of heritage assets or may provide an opportunity to tackle heritage at risk.

Where relevant, policies for allocated sites may need to make reference to identified historic environment attributes in order to guide how development should be delivered. For example, this might require the policy to include detailed criteria or providing supplementary information with the supporting text.

English Heritage strongly advises that you engage conservation, archaeology and urban design colleagues at the Council to ensure that you are aware of all the relevant features of the historic environment and that the historic environment is effectively and efficiently considered. They are also best placed to advise on local historic environment issues and priorities, including access to data held in the HER. This will ensure that there is joined up and robust approach is undertaken to historic environment issues.

We hope the advice above will help to ensure that the future Neighbourhood Plan is technically sound in accordance with government planning policy.

Yours sincerely,



Darren Ratcliffe
Historic Areas Adviser (North West)
Telephone: 0161 242 1425
E-mail: Darren.ratcliffe@english-heritage.org.uk

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Date: 4 March 2015
Our ref: 144967
Your ref: Standish Neighbourhood Area



Mr N Clarke
Places: Economy and Skills
Wigan Council
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Wigan
WN1 3DS

Sustainable Development
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6JC

BY EMAIL ONLY

T 0300 060 3900

Dear Mr Clarke,

Proposed Standish Neighbourhood Area and Neighbourhood Forum - Standish Voice

Thank you for notifying Natural England of/requesting information in respect of your Neighbourhood Planning Area dated 12/02/2015.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is a statutory consultee in neighbourhood planning. We must be consulted on draft Neighbourhood Development Plans where the Town/Parish Council or Neighbourhood Forum considers our interests would be affected by the proposals. We must be consulted on draft Neighbourhood Development Orders and Community Right to Build Orders where proposals are likely to affect a Site of Special Scientific Interest or 20 hectares or more of Best and Most Versatile agricultural land. We must also be consulted on Strategic Environmental Assessments, Habitats Regulations Assessment screening and Environmental Impact Assessments, where these are required. Your local planning authority will be able to advise you further on environmental requirements.

The following is offered as general advice which may be of use in the preparation of your plan.

Natural England, together with the Environment Agency, English Heritage and Forestry Commission has published joint advice on neighbourhood planning which sets out sources of environmental information and ideas on incorporating the environment into plans and development proposals. This is available at: http://webarchive.nationalarchives.gov.uk/20140328084648/http://cdn.environment-agency.gov.uk/lit_6524_7da381.pdf

Local environmental record centres hold a range of information on the natural environment. A list of local records centre is available at: <http://www.nbn-nfbr.org.uk/nfbr.php>

Protected landscapes

If your neighbourhood planning area is within or adjacent to a National Park or Area of Outstanding Natural Beauty (AONB), we advise that you take account of the relevant National Park/AONB Management Plan for the area. For Areas of Outstanding Natural Beauty, you should seek the views of the AONB Partnership.



National Character Areas (NCAs) divide England into 159 distinct natural areas. Each is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. Their boundaries follow natural lines in the landscape rather than administrative boundaries, making them a good decision making framework for the natural environment.

<http://www.naturalengland.org.uk/publications/nca/default.aspx>

Protected species

You should consider whether your plan or proposal has any impacts on protected species. To help you do this, Natural England has produced standing advice to help understand the impact of particular developments on protected or Biodiversity Action Plan species should they be identified as an issue. The standing advice also sets out when, following receipt of survey information, you should undertake further consultation with Natural England.

[Natural England Standing Advice](#)

Local Wildlife Sites

You should consider whether your plan or proposal has any impacts on local wildlife sites, eg Site of Nature Conservation Importance (SNCI) or Local Nature Reserve (LNR) or whether opportunities exist for enhancing such sites. If it appears there could be negative impacts then you should ensure you have sufficient information to fully understand the nature of the impacts of the proposal on the local wildlife site.

Best Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services (ecosystem services) for society, for example as a growing medium for food, timber and other crops, as a store for carbon and water, as a reservoir of biodiversity and as a buffer against pollution. It is therefore important that the soil resources are protected and used sustainably. Paragraph 112 of the National Planning Policy Framework states that:

'Local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality.'

General mapped information on soil types is available as 'Soilscapes' on the www.magic.gov.uk and also from the LandIS website; <http://www.landis.org.uk/index.cfm> which contains more information about obtaining soil data.

Opportunities for enhancing the natural environment

Neighbourhood plans and proposals may provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment, use natural resources more sustainably and bring benefits for the local community, for example through green space provision and access to and contact with nature.

Opportunities to incorporate features into new build or retro fitted buildings which are beneficial to wildlife, such as the incorporation of roosting opportunities for bats or the installation of bird nest boxes should also be considered as part of any new development proposal.

Should the proposal be amended in a way which significantly affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again at consultations@naturalengland.org.uk

We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.



Yours sincerely

Miss Rachel Bowden
Sustainable Development Consultation Team



From: CCT Contact [mailto:contact.cct@orr.gsi.gov.uk]

Sent: 23 February 2015 09:48

To: Cass, Janet

Subject: RE: Consultation - Proposed Standish Neighbourhood Area and Neighbourhood Forum - Standish Voice

Dear Sir/Madam,

Thank-you for your e-mail of 12.2.15 in regard to the proposed Standish Neighbourhood Area Plan. We have reviewed your proposals and supporting documents & note that your proposals do not affect the current or (future)operation of the mainline network in Great Britain. The ORR has no comment to make.

It might be helpful if I explain that the office has a number of key functions and duties in our role as the independent regulator of Britain's Railways. If your plans relate to the development of the current railway network including the operation of passenger and freight services, stations, stabling and freight sites (including the granting of track and station access rights and safety approvals) within your administrative area, we would be happy to discuss these with you once they become more developed so we can explain any regulatory and statutory issues that may arise. May I also draw to your attention to the interests of Network Rail & First Great Western in the development of your plans such & recommend that you consult with them.

I have attached a copy of our localism guidance for reference, which can be found at: <http://www.rail-reg.gov.uk/upload/pdf/localism-guidance.pdf>

Kind regards

A Harrison

Planning Executive

Office of Rail Regulation | One Kemble Street | 2nd and 3rd Floors | London | WC2B 4AN

Tel: 020 7282 3829 | e-mail anneli.harrison@orr.gsi.gov.uk

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United Utilities Water Limited

Developer Services & Planning
Grasmere House
Lingley Mere Business Park
Lingley Green Avenue
Great Sankey
WARRINGTON WA5 3LP

planning.liaison@uuplc.co.uk

Your ref

Our ref

Date

DC/15/675

26 March 2015

Nick Clarke
Planning Policy & Projects Manager
Places: Economy and Skills
Wigan Council
PO Box 100
Wigan
WN1 3DS

emailed to planningpolicy@wigan.gov.uk

Dear Nick

**Proposal: Wigan Metropolitan Borough Council
Consultation - Proposed Standish Neighbourhood Area and
Neighbourhood Forum - Standish Voice**

Thank you for your consultation and seeking our views in this process.

We support growth and sustainable development within the North West and would like to build a strong partnership with you and neighbourhood groups to aid sustainable development and growth.

Our aim is to facilitate sustainable development whilst safeguarding our service to customers; assist in the development of sound planning strategies, to identify future development needs and to secure the necessary long-term infrastructure investment.

At this stage we have no comments to make on the Neighbourhood Area Application submitted by the Standish Voice, but wish to be included in further consultations and where necessary, the development of the Standish Neighbourhood Plan and any Neighbourhood Development Orders or Community Right to Build Orders.

Our historical consultation responses to the Council's planning policy consultations; planning applications and pre developer enquiries are still valid and should be taken into consideration when developing the Neighbourhood Plan; supporting policies and any Neighbourhood Development Orders or Community Right to Build Orders.

To support the development of their Neighbourhood Plan, we would like to highlight the following points:

Supporting consultation comments

Supporting water & wastewater infrastructure

As with a number of Neighbourhood Plans, the key supporting water & wastewater infrastructure is located outside the boundary of the proposed Neighbourhood Plan; this is the case for the Standish Neighbourhood Area Application.

Areas covered by the application are being served by Wigan Wastewater Treatment Works [WwTW] which is located in the Civil Parish of Lathom.

The WwTW's drainage area extends beyond the boundary of the Neighbourhood Area and provides a service to a number of local communities.

Any future planning applications relating to this WwTW [to expand the works to accommodate growth] will be determined by Lathom Parish Council and West Lancashire Borough Council [which may not benefit from the change] and therefore to preserve the quality of life, well-being and prosperity of the local communities, it will be essential to develop common objectives and policies with adjacent neighbourhood groups and local planning authorities.

Major utility assets

The presence of major water assets within the proposed neighbourhood area may restrict the location, type and scale of future development; this may also include the change of use of existing developments.

To determine the suitability of development and their potential impacts on our serviceability, an assessment will be required when the layout, scale and development type is known.

Private facilities

Whilst the wastewater and water supply services are generally managed by United Utilities Water Limited, there may be properties within the proposed neighbourhood area that are being served by private facilities.

There are areas within the application boundary which are not served by the public sewerage network and therefore properties use private wastewater treatment facilities.

All of the above points will need to be taken into consideration when drafting the Neighbourhood Plan and supporting policies.

We would like to be notified of the Council's decision on whether to accept the application and the future progress of the Standish Neighbourhood Plan.

If you wish to discuss this in further detail please do not hesitate in contacting me or Jenny Hope.

Yours sincerely

Dave Sherratt
Local Development Framework Assessor
Developer Services & Planning
United Utilities Water Limited

United Utilities Water Limited
Registered in England & Wales No. 2366678
Registered office: Haweswater House,
Lingley Mere Business Park, Lingley Green Avenue,
Great Sankey, Warrington, WA5 3LP

Appendices

We would seek your support and would like to see the following comments to be taken into consideration and incorporated into your future policies and/or documents:

Water and wastewater services are vital for the future well-being of your community and the protection of the environment; when developing your future policies you should consider their impacts on the 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 your development needs.

1. National Planning Policy Framework [NPPF]

The presumption in favour of sustainable development

Local Planning Authorities [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 NPPF;
- 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.

2. Infrastructure

NPPF 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 key sites and strategic locations are deemed sustainable, plan-led and co-ordinated, strategic solutions should be developed and defined for supporting infrastructure.

An example would be the development of a joint working group [lead by you] that identifies a strategic drainage/water supply solution/s for a Neighbourhood Plan; each key site and/or strategic location.

The joint working group will include you; 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/water supply 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 not only the Neighbourhood Plan, key sites/strategic locations but also the neighbouring Neighbourhood Groups; LPA; and
- is conditional for future developments within the key site and/or strategic location.

Future development must be sustainable; prevent environmental damage and preserve the quality of life for existing and future generations; therefore, developments should be delayed until infrastructure capacity is available.

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

If additional supporting infrastructure is required then you should work closely with us [and other utility providers] to ensure a sustainable cross-boundary solution is identified and approved by the appropriate Regulators bodies before granting planning approval.

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

Where there are capacity issues; any additional developments in these and/or adjoining areas without the appropriate infrastructure solutions being implemented could result in an increased number and frequency of sewer flooding and/or water supply incidents.

You should also consider the constraints [are not limited to, but include] that are outside our control 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 psychical delivery

3. Water Resources Planning

Our Water Resources Management Plan was published in 2009, and 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:

<http://www.unitedutilities.com/WaterResourcesPlan.aspx>

We would encourage all you and developers to contact us at the earliest opportunity to enable identification of points of connection with least cost to the developer.

4. 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 us and following approval to connect.

You and developer should obtain local capacity information from our Area Teams\Connections who will 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).

5. 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.

<http://www.waterwise.org.uk/>

We 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.

6. Surface Water

Site drainage; ground conditions; local flooding issues; development layout; design and planning policies should be major considerations for you and developers when selecting possible development sites.

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 or a historical natural solution, we would question the development of a flooded site.

Surfacewater 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 you 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
- Controlled discharge into the combined sewerage network ~ this option is a last resort when all other options have been discounted.

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.

The following link shows examples of SuDS solutions; case studies; presentations; policy and regulatory documents relevant to the delivery of sustainable drainage etc.

<http://www.susdrain.org/>

The case studies section highlights numerous examples of how problematic ground conditions; topography issues can be overcome [i.e. Olympic Park, East London].

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

7. Green Infrastructure

You should seek opportunities to use developer financial and/or resource contributions to meet common objectives.

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

Building green infrastructure assets such as ponds, swales and wetlands will not only meet your Green Space needs but also your 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 your allotments, parks and garden areas.

You should identify opportunities for the installation retro fitting SuDS.

8. Climate change adaptation

Climate change is a major consideration on the future available capacity of sewerage and water supply infrastructure networks; treatment works and watercourses.

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

Developments should 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 you 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.

9. 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; therefore developments adjacent to our assets should be discouraged by you

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

To protect sensitive developments [ie residential uses] the Environmental Health Authority should be consulted if any future development is to be located adjacent to wastewater infrastructure assets. In most cases, the distance of 400 metres from the wastewater treatment facilities 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.

You must ensure we are 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 us before granting approval. It is also essential that this information is included in future planning policy

We would seek your future support in the planning processes to protect/secure land for infrastructure use.

10. Infill land

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

11. Greenfield Development

Generally Greenfield 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 need to upsize the existing assets to support the additional capacity needs; therefore this may result in a need for a co-ordinated approach to phased development in line with any supporting infrastructure works.

12. Carbon impact

You should consider 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 you should consider the wider carbon impact when determining the location of future developments.