

United Utilities Water Limited Haweswater House Lingley Mere Business Park Lingley Green Avenue Great Sankey Warrington WA5 3LP

unitedutilities.com

By email only:

Your ref: Our ref: Date: 16-DEC-24

Dear Sir / Madam

# AUDLEY RURAL PARISH – AUDLEY RURAL NEIGHBOURHOOD PLAN REG 16 CONSULTATION

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

### **Our Previous Representation**

UUW continues to refer the Parish Council and Newcastle-Under-Lyme Borough Council to our earlier submission dated 27 November 2023, which included policies that were recommended for inclusion in the NP.

#### Allocations for New Development

Following our review of the NP, we note that there are no site-specific allocations for new development above and beyond those already identified in the wider development plan for Newcastle-under-Lyme, which is currently under review. If this were to change, 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.

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

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

All UUW 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 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 UUW to understand any implications using the below details:



#### Sustainable Design

UUW notes Section 8.4 of the draft plan which relates to Public Realm and Green Landscape Design. This states (amongst other things):

'Sustainable surface water management and the efficient use of water are critical elements of the design process and sustainable surface water management should be linked to green/blue infrastructure and landscape design. Green infrastructure can help to mitigate the impacts of high temperatures, combat emissions, maintain or enhance biodiversity and reduce flood risk.

Sustainable Drainage Systems should be incorporated into the landscape design. This includes green spaces for residential developments.

Hard surfacing should be kept to a minimum area and be water permeable.'

Whilst we welcome this wording, UUW considers it would be more appropriate for this to be included as additional criteria within the policy text for Policy ANP4 Sustainable Design. Our recommended wording is below:

- 'Sustainable Drainage Systems must be incorporated, which are multi-functional where possible, and integrated with the landscaping proposals and green/blue infrastructure.
- Hard surfacing must be kept to a minimum area and be water permeable.'

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 are an inherent component of reducing flood risk and the likelihood of discharges into the region's watercourses from sewer overflows. As such, we consider it critical to include clear and unambiguous policy that sets out the requirement for sustainable management of surface water in the policy on Sustainable Design.

# Summary

If you have any queries or would like to discuss this representation, please do not hesitate to contact me at **a second s** 

Yours faithfully

United Utilities Water Limited