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**Your ref**  
**Our ref** DC/11/3128  
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Dear Ms Ford

**Proposal: Oldham Local Development Framework Joint Core Strategy and Development Management Policies Development Plan Document**

Thank you for your consultation and seeking the views of United Utilities Water plc [U UW] in this process.

U UW supports the growth and development within the North West.

U UW would like to build a strong partnership with Local Planning Authorities [LPA] to aid development and growth.

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

U UW is developing it's response to the National Planning Policy Framework [NPPF]; until this has been completed and/or the location[s] of the proposed 20% increase has been defined we can not make a comment at this point in time

U UW would like to make the following additional related comments:

## **General notes:**

### **PPS12 - Infrastructure**

The core strategy should be supported by evidence of what physical, social and green infrastructure is needed to enable the amount of development proposed for the area, taking account of its type and distribution.

This evidence should cover who will provide the infrastructure and when it will be provided. The core strategy should draw on and in parallel influence any strategies and investment plans of the local authority and other organisations.

*[Reason: Satisfactory and sustainable development]*

### **Infrastructure**

To preserve the quality for the existing community and to prevent environmental damage; developments should not be permitted until infrastructure capacity is available.

Uuw cannot confirm if capacity is available until the connection point/s, flows and completion dates are confirmed, therefore the LPA should work closely with Uuw and other utility providers to ensure funding and infrastructure plans are secured with their Regulators before granting planning approval; failure will result in the deterioration of the community's quality of life and environmental damage.

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

Uuw 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 existing customers; the environment and Uuw; not forgetting the additional financial burden on Uuw's customers.

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

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

## **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.

UUW can not provided a true impact assessment on the development plots identified in your SHLAA, UUW would preferred to met 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]*

## **Water Resources Planning**

Our 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:

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

We would encourage all developers and planners to contact UUW 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 where and when permitted.

Planners and Developer should obtain local capacity information from the UUW 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.

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.

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

## **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]*

## **Surface Water**

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

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

Every option should be investigate 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:

- 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 via an approved SUDS solution
- 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 from UUW.

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

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]*

### **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 UUW 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 UUW 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 UUW 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.

*[Reason: To protect existing 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. U UW 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]*

**Climate change adaptation**

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 LA Planners should seek a significant reduction in the discharge from developments.

Paving over front gardens has potential contribution to flood risk and should be discouraged.

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

Yours Sincerely

Dave Sherratt  
Local Development Framework Lead  
Supply, Demand & Asset Protection Team  
United Utilities Water plc

