

By email only: planningpolicy@shropshire.gov.uk

Planning Policy
Shropshire Council
PO Box 4826
Shrewsbury
SY1 9LJ

Your ref:

Our ref:

Date: 01-SEP-23

Dear Sir / Madam

THE THREE PARISHES PLAN

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

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 Shropshire. 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 masterplanning 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 U UW to understand any implications using the below details:

Developer Services – Wastewater Tel:
03456 723 723
Email: SewerAdoptions@uuplc.co.uk

Developer Services – Water Tel:
0345 072 6067
Email: DeveloperServicesWater@uuplc.co.uk

Objectives

U UW notes Objectives 1 and 2 of the NP which state:

- 1. To allow future infill development in the Three Parishes which respects the variety of building styles and materials used in the area.***
- 2. Limited infill in each settlement which respects the rural outlook, maintaining gaps between settlements.***

Whilst we are supportive of the principle of these objectives we wish to highlight the need to ensure that progressive infill proposals do not result in a level of growth within a settlement which is disproportionate to the size of the settlement, which can place a strain on existing infrastructure. In this regard, we request that the Objectives reference consistency with wider development plan policy in the emerging Shropshire Local Plan 2016-2038 (hereinafter referred to as '*the emerging local plan*'). In particular, Policies SP8 (Managing Development in Community Hubs), Policy SP9 (Managing Development in Community Clusters) and Policy SP10 (Managing Development in the Countryside). These policies ensure that there is control applied to any development proposed in such locations. For example, criterion 4d of Policy SP9 states:

'4. To be considered appropriate, development proposals within Community Clusters must also comply with all of the following:

d. There is sufficient infrastructure capacity to support the development, or any infrastructure capacity constraints can be addressed through the development, consistent with relevant policies of this Local Plan.'

Policy H1 Housing Design

U UW notes the provision within the emerging Three Parishes Plan relating to carbon reduction. A critical element of the response to climate change is sustainable surface water management and the efficient use of clean water supply. We wish to ensure that the NP gives appropriate emphasis to designing new development so that it is resilient to the challenges of future climate change, such as, multi-functional sustainable drainage, avoidance of flood risk, natural flood management techniques and the incorporation of water supply efficiency measures.

We wish to highlight that improving water efficiency makes a valuable contribution to water reduction as well as carbon reduction noting that water and energy efficiency are linked. We also wish to note the associated societal benefits by helping to reduce customer bills.

Whilst being supportive of Policy H1, we request that this also makes reference to wider design requirements of the emerging local plan relating to water efficiency and sustainable drainage. In particular, we request that the policy includes the following additional points:

- *‘Provides new housing to meet the Building Regulations Optional Standard for Water Efficiency in new housing.*
- *Robustly applies the surface water hierarchy for managing surface water and incorporates sustainable drainage which is multi-functional, in preference to underground piped and tanked storage systems, unless, there is clear evidence why such techniques are not possible.*
- *Ensure landscaping proposals are integrated with the strategy for sustainable water management.’*

We also request that the NP includes provision for water efficiency in non-domestic buildings. We recommend the following wording in the wider NP.

- *‘Non-domestic buildings will be required to reach ‘Good’ BREEAM status or an equivalent status endorsed by Shropshire Council, for water efficiency as a minimum, unless it can be demonstrated that this make the development unviable.’*

Policy G2 Protection and Enhancement of Biodiversity

With respect to this policy we are supportive of the implementation of sustainable drainage systems (SuDS) using natural features such as drainage ditches and ponds.

With regards to the wider policy, we must reluctantly object to the final criterion which states:

- *Where on-site net gain for biodiversity is not feasible then other areas specified by the Parish Council may be appropriate to add such value to the local Nature Recovery Network.*

We believe that whilst consideration may be given to local sites, including those sites where communities could benefit from improved access, the process for determining the best opportunities for delivering net gain is a matter for a qualified ecologist and existing procedures endorsed by Natural England rather than via a determination by the Parish Council. Ultimately there is already a mechanism set out in the Biodiversity Metric that allows for off-site provision and this is the most appropriate mechanism for determining proposals for biodiversity net gain (BNG).

In this context, U UW wishes to note that it is critical that land at and around our key infrastructure sites is not sterilised to ensure that we are able to flexibly and most appropriately respond to future growth and environmental drivers. This approach is supported by the planning practice guidance which states that the approach to BNG should be resilient to future pressures from further development. It states:

‘When assessing opportunities and proposals to secure biodiversity net gain, the local planning authority will need to have regard to all relevant policies, especially those on open space, health, green infrastructure, Green Belt and landscape. It will also be important to consider whether provisions for

biodiversity net gain will be resilient to future pressures from further development or climate change, and supported by appropriate maintenance arrangements.

Paragraph: 023 Reference ID: 8-023-20190721

Revision date: 21 07 2019'

We also wish to also note that biodiversity mitigation / enhancement should not be located directly over water and wastewater assets or where excavation onto the asset would require removal of the biodiversity.

We therefore suggest the following amendment to the proposed policy wording:

- *Where on-site net gain for biodiversity is not ~~feasible~~ appropriate then other areas will be considered ~~specified by the Parish Council may be appropriate to add such value to the local Nature Recovery Network.~~ in accordance with wider government policy and the latest biodiversity metric.*

New Policy – Supporting Utility Infrastructure

UW wishes to highlight that it owns assets within the NP area in areas of open countryside. Upgrades to such assets may be required in the future, and it is important to ensure that any required upgrades and expansions to these sites can be made in order for us to meet the infrastructure requirements of proposed future development in the Three Parishes and future environmental drivers. UW requests support for any investment in our assets. It is therefore requested that a policy is included in the NP to recognise that investment in water and wastewater infrastructure, including infrastructure located outside the settlement boundary, is appropriate for development for operational infrastructure purposes. Our recommended wording is:

'We will support water and wastewater infrastructure investment which facilitates the delivery of wider sustainable development and the meeting of environmental objectives of water and sewerage undertakers including development proposals for water and wastewater infrastructure beyond the settlement boundaries in open countryside or in existing green spaces, where it is demonstrated that the investment is needed to respond to future growth and environmental needs.'

Summary

If you have any queries or would like to discuss this representation, please do not hesitate to contact me at planning.liaison@uuplc.co.uk.

Yours faithfully

Andrew Leyssens
Planning, Landscape and Ecology
United Utilities Water Limited