

# **Eden Local Plan Examination Hearings May 2017**

## **Introduction**

Eden District Council (EDC) has submitted the Local Plan for the period 2014 to 2032 for examination. In accordance with national planning policy (specifically paragraph 162 of the National Planning Policy Framework), as well as, the status of United Utilities Water Limited (UU) as a statutory consultee in the preparation of development plans, UU has worked closely with the local planning authority on the preparation of a new Local Plan. This statement is provided in response to a request during the examination hearings in May 2017 regarding the position of UU in relation to the development proposed within Kirkby Stephen.

## **Background**

Every five years Ofwat, the economic regulator of the water industry, carries out a review of the prices that the appointed water and sewerage companies can charge their customers. This includes taking decisions on the services customers receive and the investment companies need to carry out. Ofwat determine these charges on the basis of best value for customers. The most recent price review by Ofwat occurred in 2014. The next review is scheduled for 2019.

Water and sewerage companies are a statutory consultee through the development plan process. The planning process provides details on where growth may occur and is one factor which helps to inform the five yearly investment submission to Ofwat and infrastructure investment forecasts. The degree of confidence is improved where our investment decisions are based on up to date development plans and planning permissions as opposed to unforeseen, unallocated sites. It is relevant to note that development plans normally cover 15 year periods. In contrast the price reviews of water and sewerage companies cover 5 year periods.

The planning process offers an opportunity for water and sewerage undertakers to understand where growth is occurring, to consider how investment should be prioritised and to minimise the impact of growth on water and wastewater infrastructure. For both water and wastewater, the impact of growth on infrastructure is dependent on detailed information. This detail tends to become available at the planning application stage.

With regards to wastewater, it is particularly important to understand the detail of the drainage proposals. This includes whether both foul and surface water will discharge to the public sewerage system as well as connection points and the rates of discharge. The flows that arise from a surface water connection are significantly greater than the flows that arise from a foul water connection. Surface water connections therefore have potential to put a significant strain on wastewater infrastructure.

## **UU Position in Kirkby Stephen**

In the spirit of the plan making process, EDC and UU have engaged in meaningful discussion regarding the proposed allocations and the practical issues associated with most appropriately managing the impact of the development proposed during

the plan period on water and wastewater infrastructure. For confirmation, UU has no in principle objection to the site allocations in Kirkby Stephen.

We understand a specific question has been raised with respect to the wastewater infrastructure.

UU wishes to emphasise the importance of a foul only connection to the public sewer. In line with national government guidance, UU highlights the importance of the surface water hierarchy being fully explored in advance of any connection of surface water to the existing public sewer. UU wishes to highlight the importance of including SuDs (sustainable drainage systems) in the development allocations within Kirkby Stephen.

As noted above, UU has advised EDC that a fuller understanding of the impact on water and wastewater infrastructure is gathered at the planning application stage when more details are known. At this point, UU will be able to better understand the impact on infrastructure and as a result it may be necessary to recommend mitigating measures through planning conditions. These mitigating measures may include coordinating the delivery of development with the timing for the delivery of infrastructure improvements if identified as necessary, controlling the point of connection and controlling the rate of discharge to the public sewer. UU notes the helpful inclusion of policy DEV2 in relation to surface water management and policy DEV4 in relation to infrastructure.

Finally, if development is brought forward by more than one developer and on a piecemeal basis on any of the allocations in Kirkby Stephen, UU recommends that it is important to ensure coordination between phases of development.

3 May 2017