

From: [REDACTED]@Manchester
To: [Local Dev. Framework](#)
Cc: [REDACTED]; [REDACTED]; [REDACTED]@Manchester; [REDACTED]
Subject: Craven Local Plan - Publication Draft Consultation
Date: 13 February 2018 16:45:23
Attachments: [20180213 Publication Draft Craven Local Plan \(Master\).pdf](#)

Dear Sir / Madam,

CRAVEN LOCAL PLAN – PUBLICATION DRAFT LOCAL PLAN CONSULTATION

Please find attached a representation to the consultation on the 'Publication Draft' (dated 13th February 2018), submitted on behalf of United Utilities Water Ltd.

Grateful if you could please confirm receipt.

Kind regards,

[REDACTED]

[REDACTED] MRTPI | Planner
Planning and Development
CBRE Ltd
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Telephone [REDACTED]

unitedutilities.com

Date 13th February 2018

Planning Policy
Craven District Council
1 Belle Vue Square
Skipton
BD23 1FJ

By Email: (localplan@cravendc.gov.uk)

Dear Sir / Madam,

CRAVEN LOCAL PLAN – PUBLICATION DRAFT CRAVEN LOCAL PLAN

Thank you for your consultation seeking the views of United Utilities as part of the Development Plan process.

United Utilities wishes to build a strong partnership with all Local Planning Authorities (LPAs) to aid sustainable development and growth within its area of operation. We aim to proactively identify future development needs and share our information. This helps:

- ensure a strong connection between development and infrastructure planning;
- deliver sound planning strategies; and
- inform our future infrastructure investment submissions for determination by our regulator.

When preparing the Development Plan and future policies, we can most appropriately manage the impact of development on our infrastructure if development is identified in locations where infrastructure is available with existing capacity. It may be necessary to co-ordinate the delivery of development with the delivery of infrastructure in some circumstances.

Upon adoption, the emerging Craven Local Plan will represent the key planning document for the District, setting the level and general location of new development to meet its future needs to 2032. The Local Plan will also identify specific development sites intended to contribute to the achievement of the wider development targets for the District.

United Utilities wishes to submit the following comments to the Council for consideration **as part of the current 'Publication Version'** Local Plan consultation. Our comments are submitted in accordance with the consultation deadline of 13th February 2018.

Site Allocations

We note that the Local Plan is considering the allocation of a number of large development sites for a mix of land uses. The Council is aware from past discussions with colleagues that a fuller understanding of the impact on water and wastewater infrastructure can only be achieved once more details are known, such as the timescales for development, the approach to surface water management and the chosen points of connection. On receipt of more information it may be that we can provide more detailed comments regarding the sites which are being promoted as draft allocations. The assessment of capacity in our infrastructure is an ongoing process as a range of details become available.

Additional information in respect of development sites is often only available at the planning application stage. With this information, we will be able to better understand the potential impacts of development on infrastructure and, as a result, it may be necessary to coordinate the delivery of development with the timing for delivery of infrastructure improvements. We have recommended that this should be included as a detailed development management policy and in this regard we note the content of Draft Policy ENV8: Water Resources, Water Quality and Groundwater.

In relation to this point, it is worthwhile highlighting that many of the rural areas of the District will be supported by infrastructure which is proportionate to its rural location. We would like to emphasise that disproportionate growth in any settlement, particularly smaller settlements, has the potential to place a strain on existing water and wastewater infrastructure.

Fragmented Ownership

For any strategic sites within its area of operation, United Utilities would be interested to know whether the site is within fragmented ownership. If ownership is fragmented, we would strongly encourage the Council to establish how the landowners intend to work together to ensure the co-ordinated delivery of infrastructure in the most sustainable fashion.

We believe that coordinated delivery of infrastructure can only be secured on strategic sites in fragmented ownership where there is a clear legal agreement between the landowners. This legal agreement would ensure the coordinated site-wide delivery of infrastructure in the most appropriate way, alongside an associated site-wide mechanism for drawing down land value between landowners on all development parcels, whilst also making proportionate contributions to key infrastructure as the delivery of the site takes place.

SPECIFIC COMMENTS

The following comments are submitted by United Utilities in response to the specific draft policies contained within the current Publication Local Plan. We wish to highlight that our previous representations remain valid.

Infrastructure Provision

United Utilities wishes to highlight the assets which are currently situated outside of the settlement boundary. Upgrades to these assets may be required in the near 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 borough. It is therefore requested that Local Policy is worded to recognise that utility sites, located within the countryside are appropriate for development for operational purposes. Our preference would be for this principle to be reflected on the proposals map and in development plan policy. These assets include:

- Clapham Beck Wastewater Treatment Works (WWTW)
- Lower Bentham WWTW
- Burton in Lonsdale WWTW
- Horton in Ribblesdale WWTW
- Newby WWTW
- Austwick WWTW
- Long Preston WWTW
- High Benham WWTW
- Hellifield WWTW
- Ingleton WWTW
- Gildersleets WWTW

This would enable us to ensure that we can continue to meet the growth and development aspiration of the Borough as well as respond to environmental agendas in accordance with our obligations.

Health and Well-Being

We have previously recommended the inclusion of text within the Policy ENV3 (Good Design). We welcome the addition of criterion (f) as we feel it is important to highlight that new development sites are more appropriately located away from existing operational sources of pollution such as noise and odour. For ease of your reference, our wastewater treatment works in your borough include:

- Clapham Beck WWTW
- Lower Bentham WWTW
- Burton in Lonsdale WWTW
- Horton in Ribblesdale WWTW
- Newby WWTW
- Austwick WWTW
- Long Preston WWTW
- High Benham WWTW
- Hellifield WWTW
- Ingleton WWTW
- Gildersleets WWTW

Plans of these sites are enclosed.

Development Principles for Housing Sites, Regeneration Sites and Employment Sites identified in draft Policy SP5

With respect to site references SG032 (13 dwellings), SG035 (32 dwellings), HB011 (70 extra care dwellings), HB024 (27 dwellings), HB038 (19 dwellings) and LB012 (18 dwellings); we are very disappointed to see no reference to SuDS within the Development Principles.

The national ministerial statement on Sustainable Drainage is clear that major development sites such as these should include sustainable drainage. Even on town centre sites, the inclusion of innovative approaches to sustainable drainage should be considered by the developer and encouraged by the local planning authority. At the very least we recommend that the development principles for each of the above-mentioned sites outline the need to consider sustainable surface water management in accordance with the principles of sustainable drainage within national planning practice guidance. This should include consideration of how site landscaping can contribute to a reduction in surface water flows and a reduction in flood risk. We request that this change is made to each of the respective Development Principles.

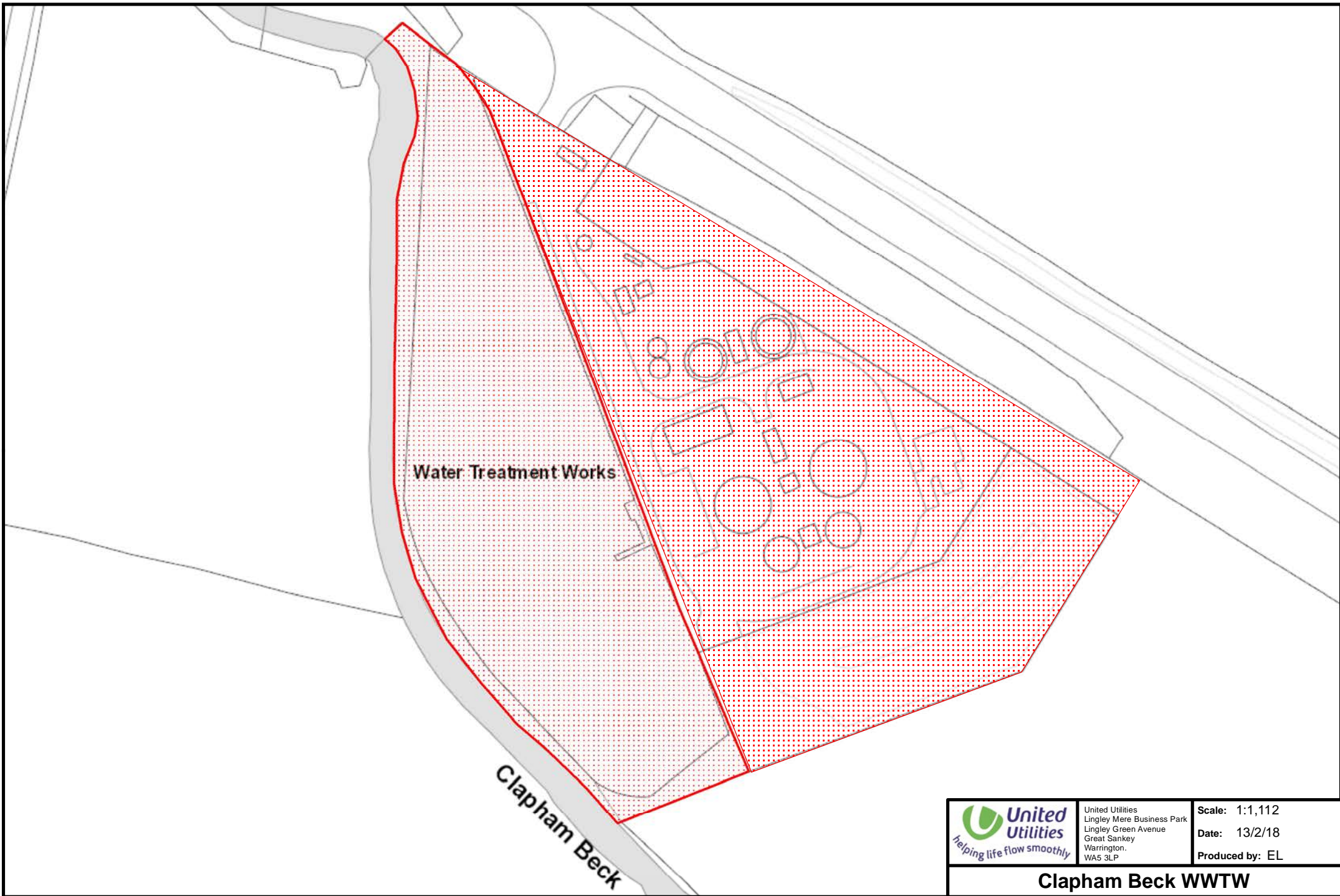
Summary

Moving forward, we respectfully request that the Council continues to consult with United Utilities for all future planning documents. We are keen to continue working in partnership with the Council to ensure that all new growth can be delivered sustainably, **and with the necessary infrastructure available, in line with the Council's delivery targets.**

In the meantime, if you have any queries or require further clarification on any of the above matters, please do not hesitate to contact me on [REDACTED].


Yours faithfully

[REDACTED]
LDF Planning Manager
Developer Services & Planning
United Utilities Ltd



Water Treatment Works

Clapham Beck

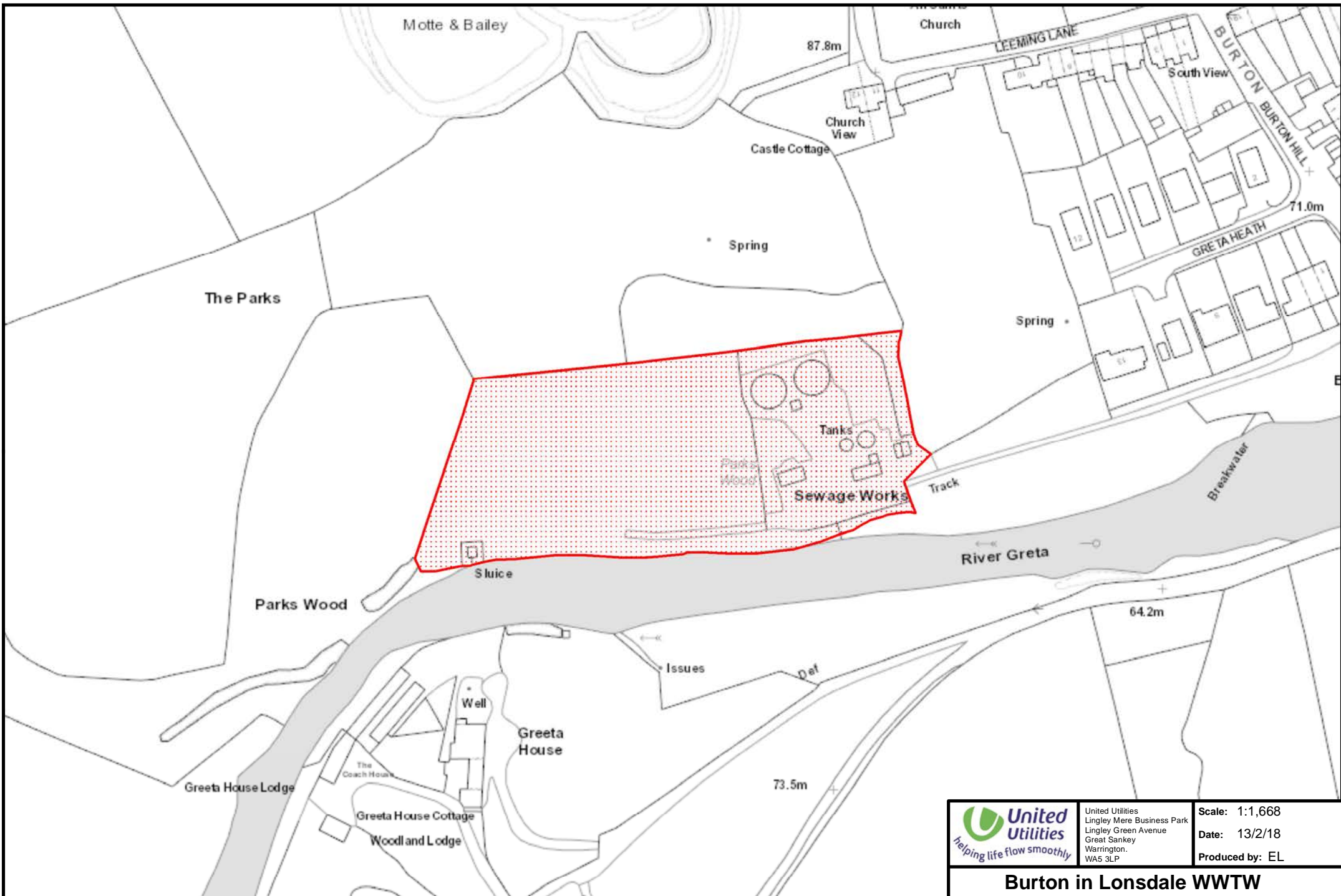
	United Utilities Lingley Mere Business Park Lingley Green Avenue Great Sankey Warrington. WA5 3LP	Scale: 1:1,112 Date: 13/2/18 Produced by: EL
	Clapham Beck WWTW	

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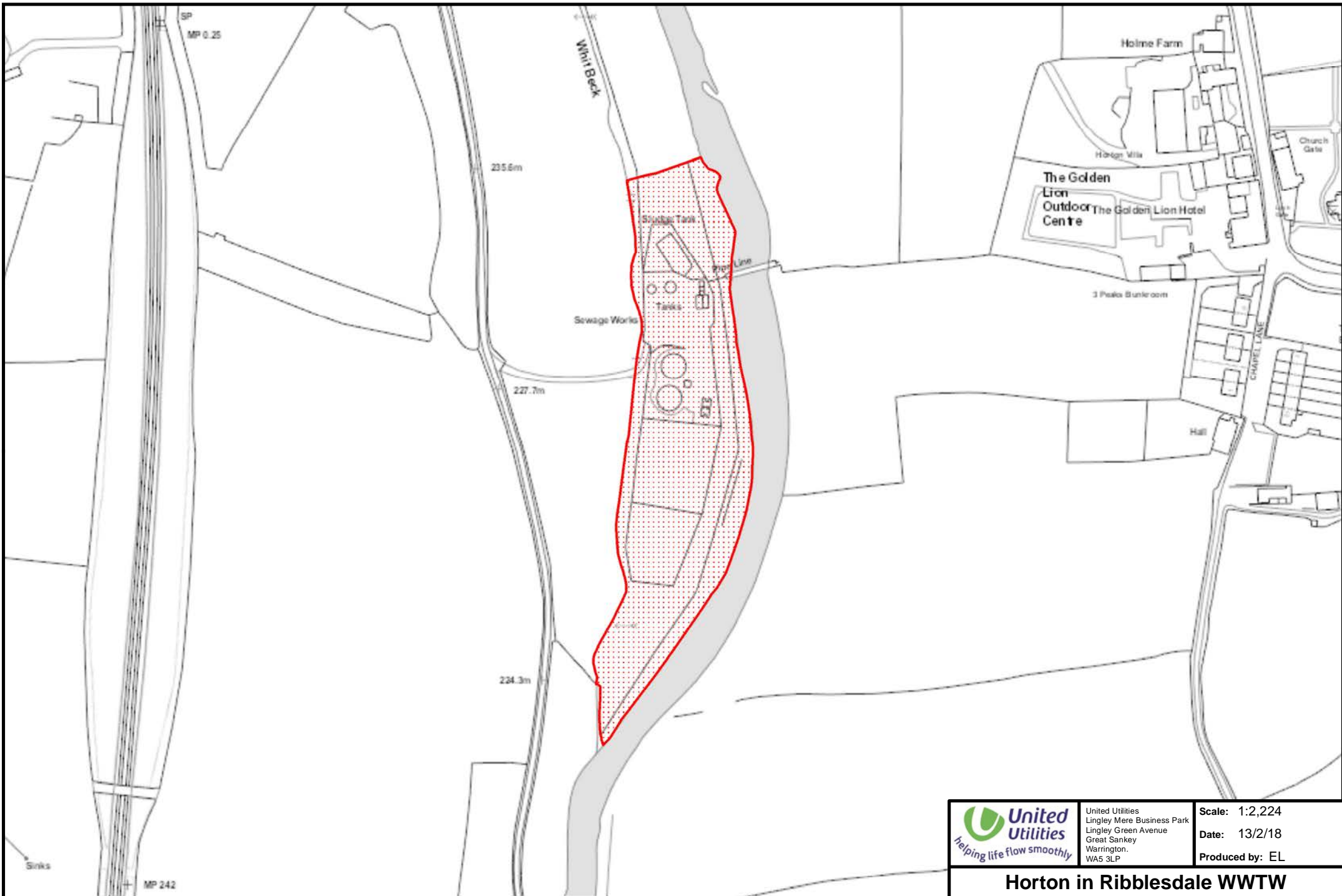
 <p>United Utilities helping life flow smoothly</p>	<p>United Utilities Lingley Mere Business Park Lingley Green Avenue Great Sankey Warrington. WA5 3LP</p>	<p>Scale: 1:1,668 Date: 13/2/18 Produced by: EL</p>
	<p>Lower Bentham WWTW</p>	

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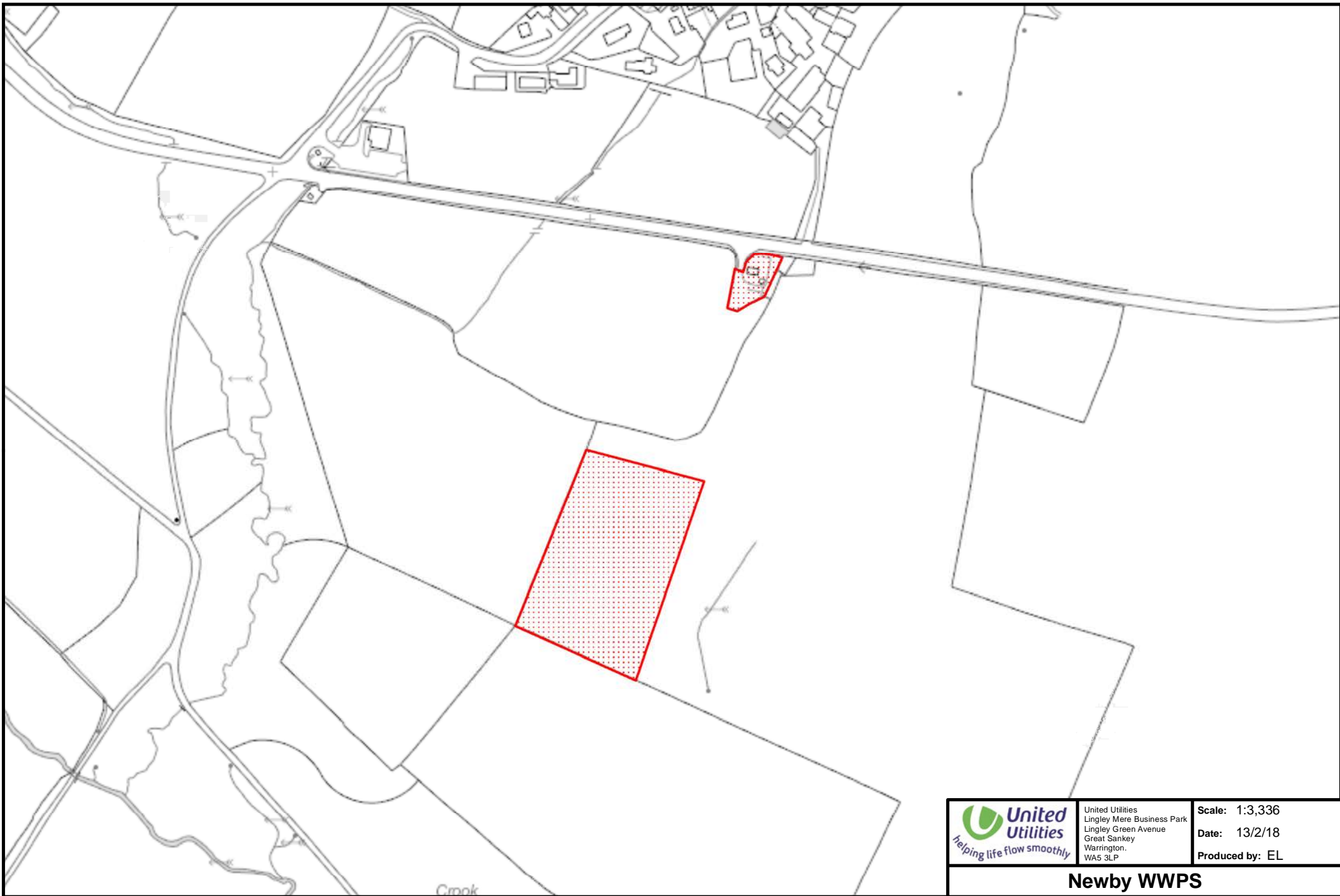


 <p>United Utilities helping life flow smoothly</p>	<p>United Utilities Lingley Mere Business Park Lingley Green Avenue Great Sankey Warrington. WA5 3LP</p>	<p>Scale: 1:1,668 Date: 13/2/18 Produced by: EL</p>
	<p>Burton in Lonsdale WWTW</p>	

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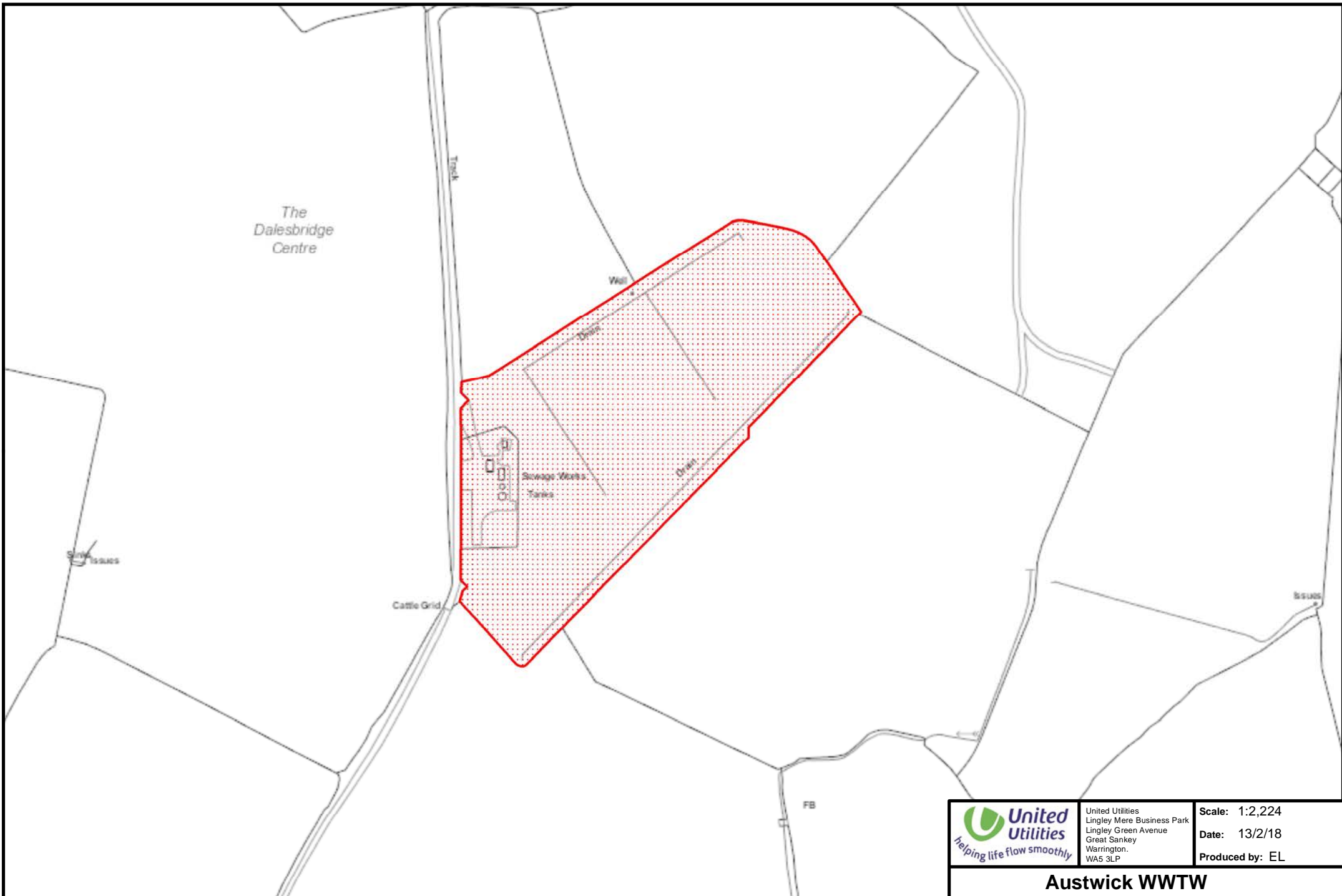
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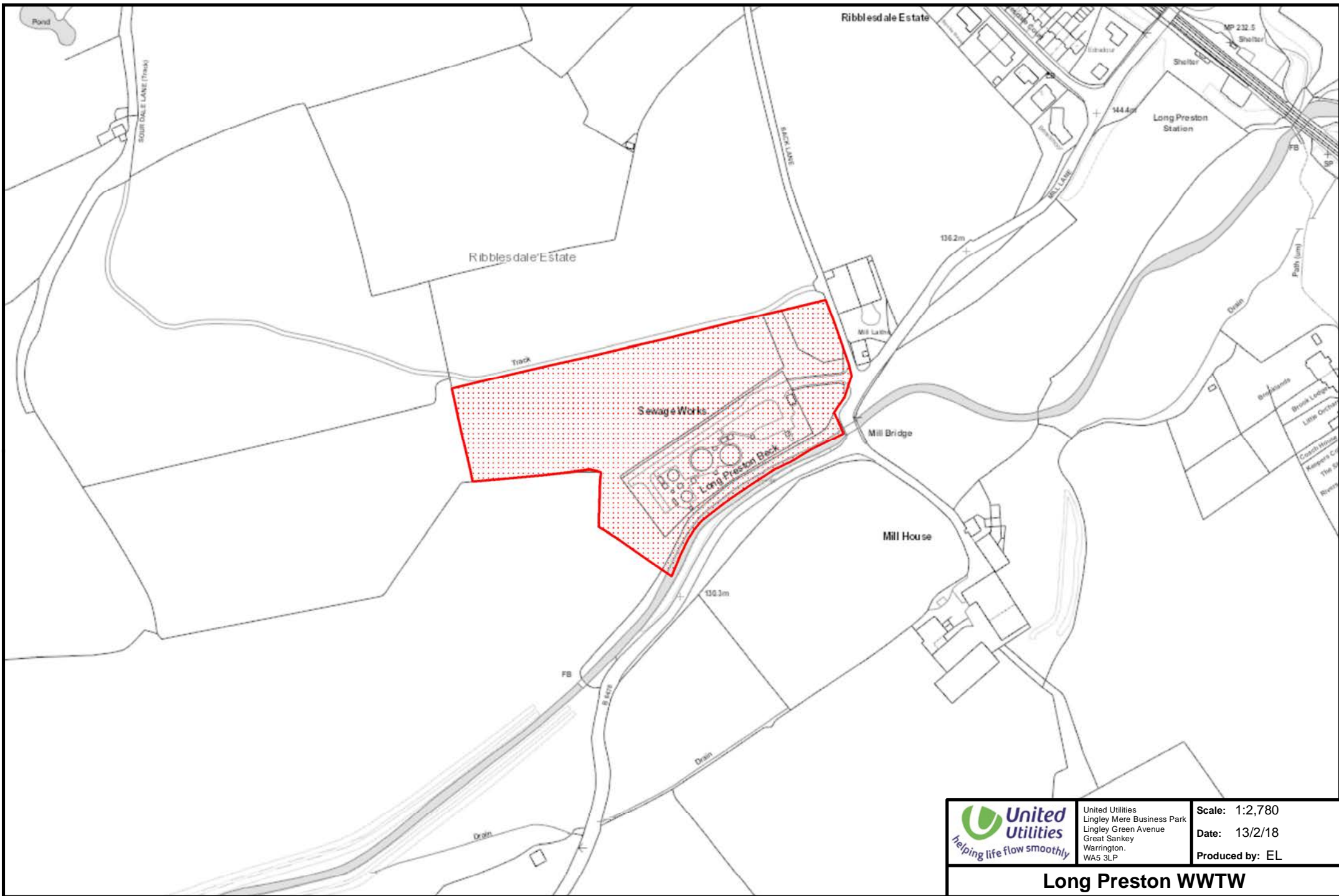
Newby WWPS

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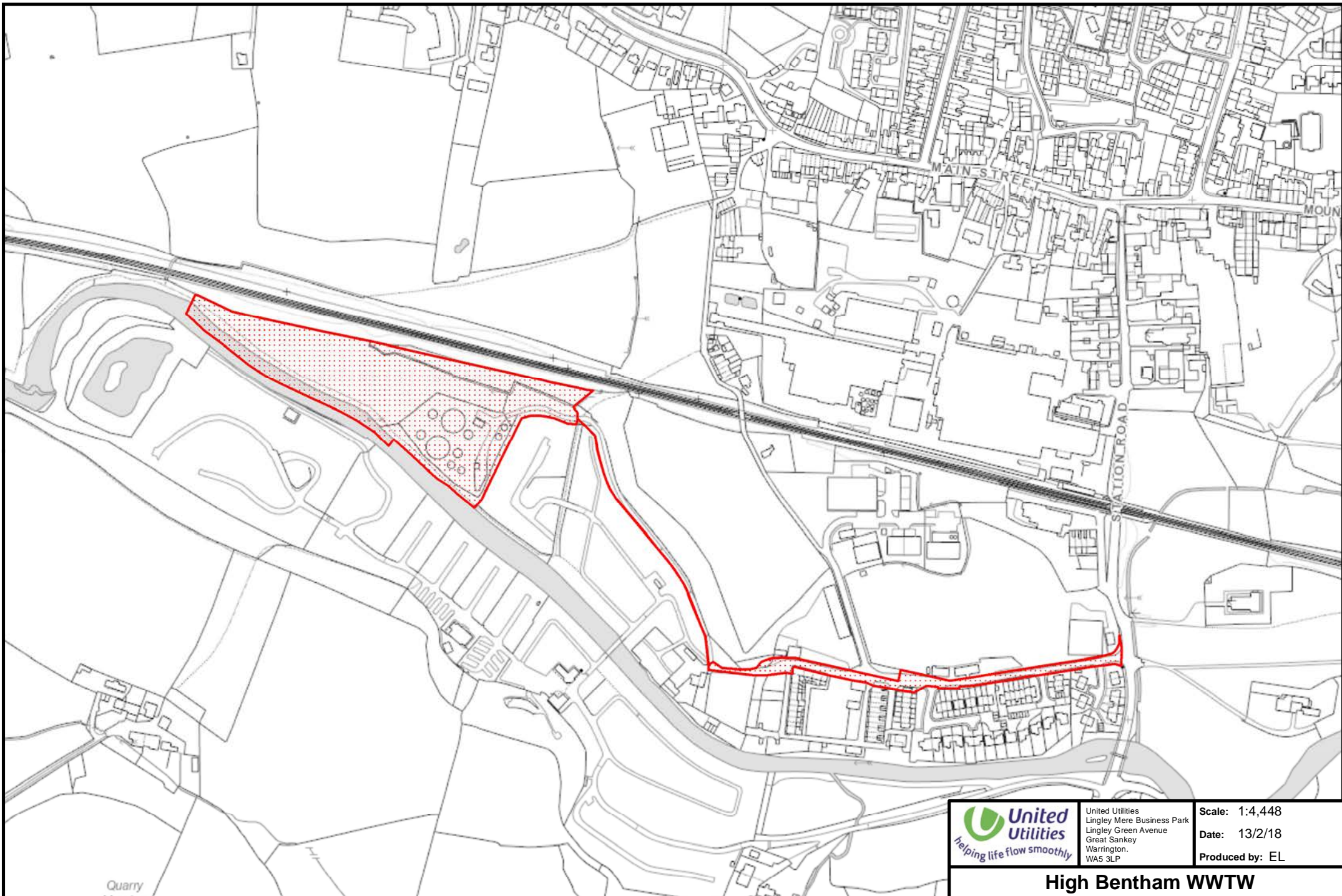
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	Austwick WWTW	

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	<h2>Long Preston WWTW</h2>	

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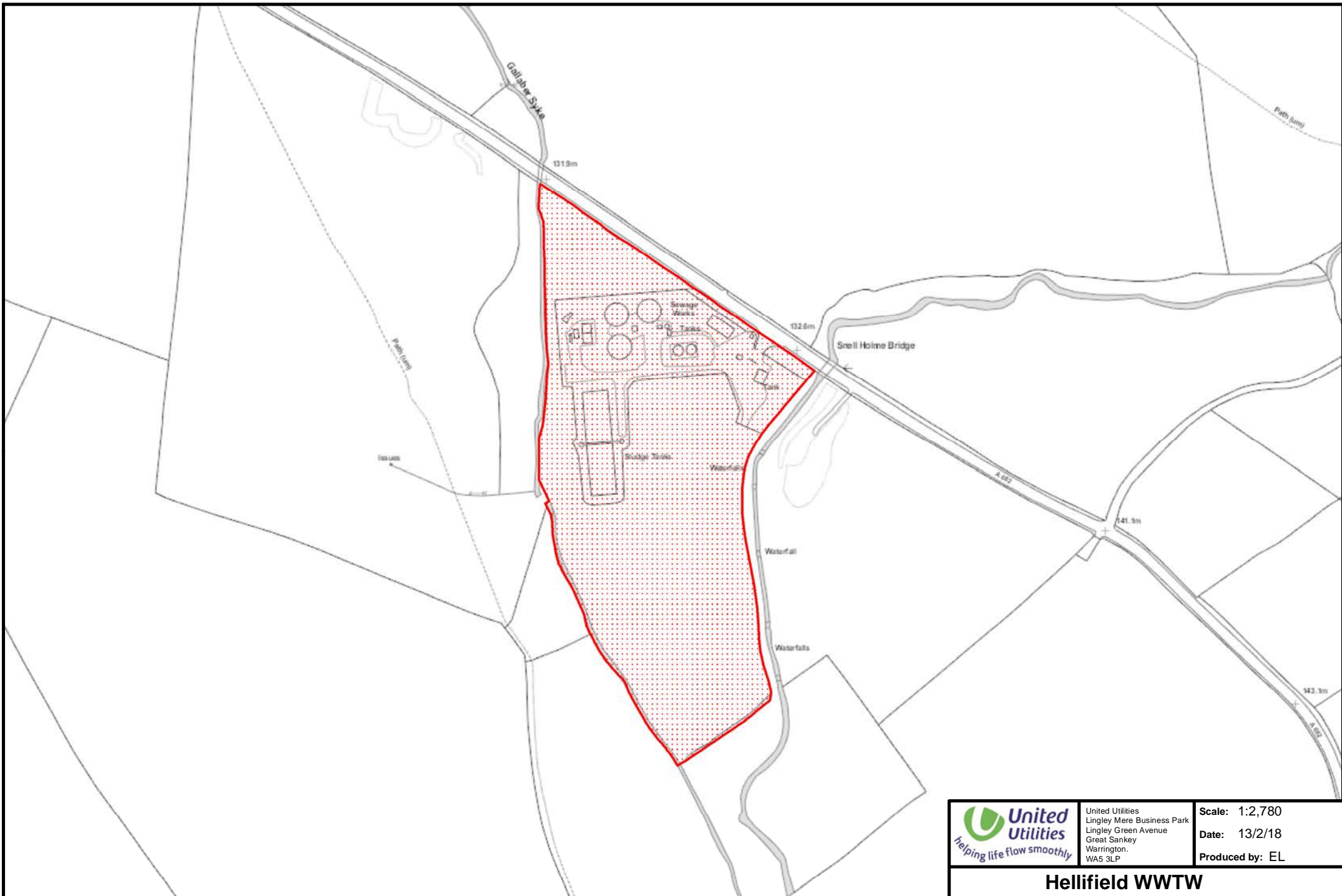


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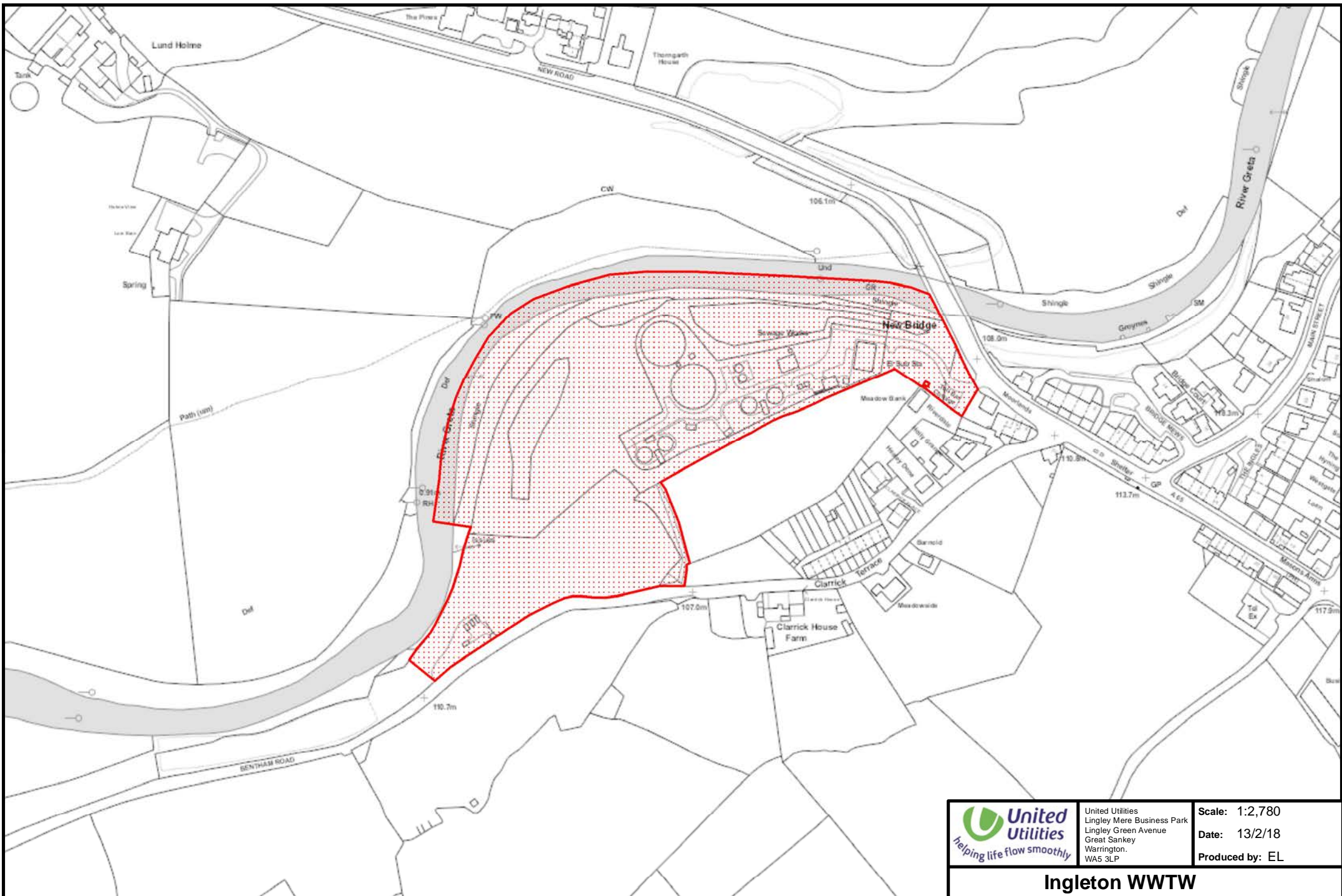
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High Bentham WWTW

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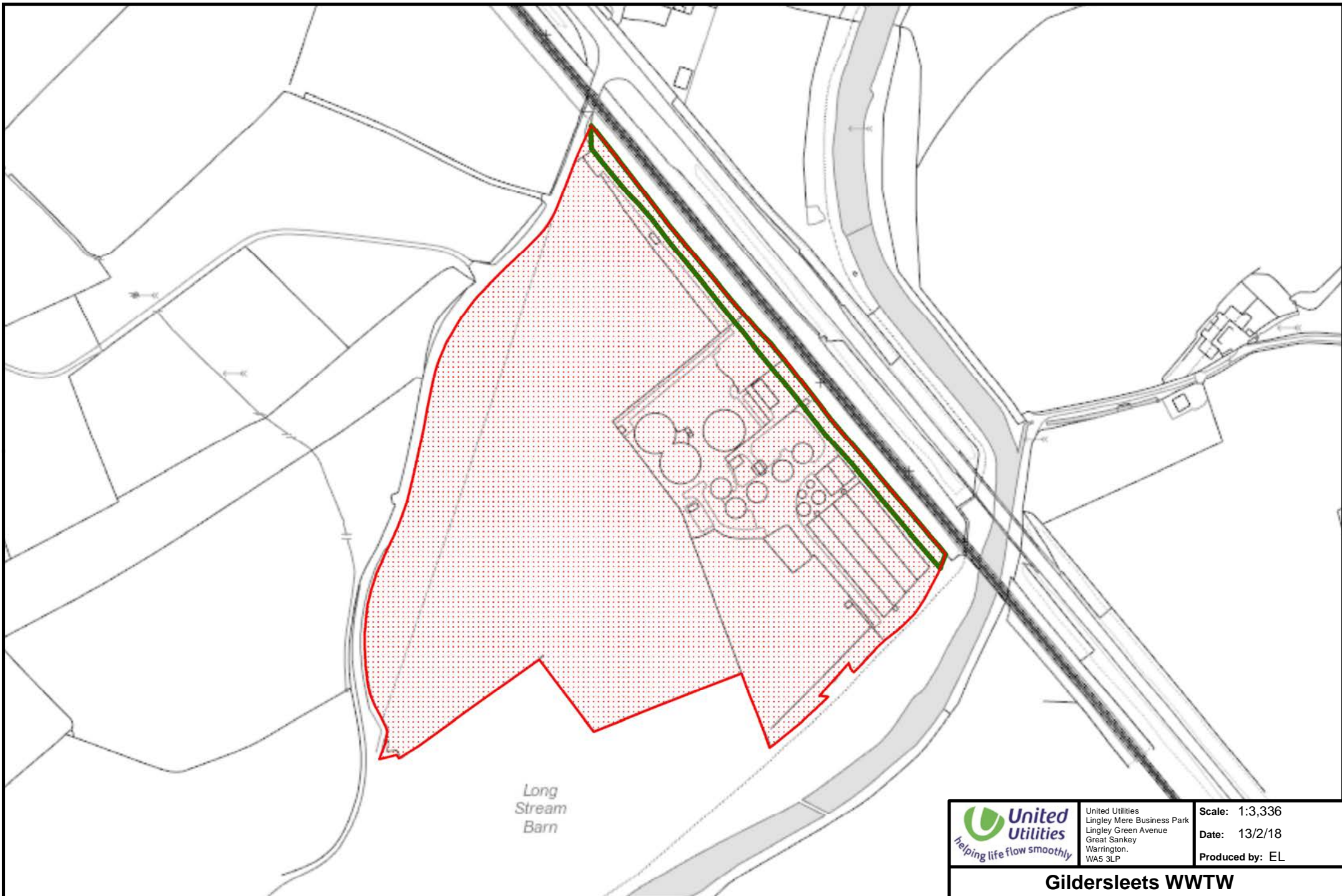


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Ingleton WWTW

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