

**Matter 7 – Policy EP1 Land to the S of Altham Business Park (EMP3)**

**United Utilities Water Limited (UW)**

**Question 17**

**17. In the interest of clarity and effectiveness, should an additional environmental criterion be added which ensures a holistic and co-ordinated approach to foul and surface water drainage and incorporate multifunctional SuDS (sustainable drainage) that are designed in accordance with the 4 pillars of SuDS and integrated with the landscaped environment?**

UUW has concerns regarding any large allocations, especially if they are in multiple land ownerships. The experience of UUW is that where sites are brought forward in a phased and fragmented manner, the achievement of sustainable development can be compromised by developers/applicants working independently. We therefore encourage the council to make early contact with all landowners/site promoters and challenge those landowners on how they intend to work together, preferably as part of a legally binding delivery framework and/or masterplan. The council should give early consideration to the extent to which land ownership is fragmented on sites and whether this will be likely to compromise a co-ordinated approach to the delivery of sustainable development. We believe that raising this point is in the best interest of achieving challenging delivery targets and economic growth from allocated sites in the most sustainable and co-ordinated manner.

We recommend that future policy requires applicants to provide infrastructure strategies, including drainage strategies for foul and surface water. For this site, we recommend the following policy wording:

***Applications must be supported by an allocation wide infrastructure strategy to demonstrate how the site will be brought forward in a co-ordinated manner. This shall include an allocation wide foul and surface water drainage strategy. A proliferation of pumping stations on a phased development will not be acceptable.***

***Explanatory text***

*The infrastructure strategy shall be prepared in liaison with infrastructure providers and demonstrate how each phase interacts with other phases and ensure coordination between phases of the development over lengthy time periods and by numerous developers. The strategy must be updated to reflect any changing circumstances between phases during the delivery of the development.*

*A holistic allocation-wide drainage strategy will be required to ensure a coordinated approach to drainage between phases, between developers, and over a number of years of construction. Applicants must demonstrate how the approach to drainage on any phase of development has regard to interconnecting phases within the site with infrastructure sized to accommodate interconnecting phases. When necessary, the holistic drainage strategy must be updated to reflect any changing circumstances between each phase. The strategy shall be prepared in liaison with infrastructure providers and outline how each phase interacts with other phases.*

We also request that the policy includes clarity in relation to the requirement for sustainable drainage systems. This clarity is critical to avoid regulatory / policy uncertainty and ensure a level playing to developers operating in a competitive setting when acquiring a site (see Sustainable drainage and new housing developments, Payne, Walker, Illman and Sharp, 2023). We strongly recommend that policy and design guidance clearly identifies the need for all major developments to make space for multi-functional sustainable drainage systems. As evidenced in the aforementioned research, clarity of policy requirements will help to secure better sustainable drainage results in the final design of the development. We believe that adding this clarity to site-specific policy helps to remove uncertainty, which in turn helps to contribute to a level playing field during the land acquisition process. We therefore recommend the following additional policy wording:

***Applicants must identify land at the site that ensures the delivery of multi-functional sustainable drainage in accordance with the four pillars of sustainable drainage which is integrated with the landscaped environment.***

Word count: 612