

By email only: neighbourhoods@cheshireeast.gov.uk

Your ref:
Our ref:
Date: 20-OCT-25

Dear Sir / Madam

**CHESHIRE EAST – NETHER ALDERLEY NEIGHBOURHOOD PLAN SUBMISSION VERSION 2025-2030
WITH DESIGN CODES AND GUIDANCE**

Thank you for your consultation seeking the views of United Utilities Water Limited (Uuw) as part of the preparation of a Neighbourhood Plan (NP) for Nether Alderley. Uuw wishes to build a strong partnership with neighbourhood groups to aid sustainable development and growth. This consultation relates to the submitted plan consultation. From our review of the submitted version of the NP, Uuw wishes make the following comments.

Policy HD1 Local Design and Character

We note Policy HD1 states:

‘Any new development and conversions in Alderley Park, Nether Alderley Village and the wider countryside should be informed by Nether Alderley Design Codes and Guidance.’

Whilst we are supportive of this approach, we wish to highlight that there is very limited reference to sustainable drainage / water efficiency in the Nether Alderley Design Codes and Guidance Draft Report 2024, hereafter referred to as *‘the Design Code’*. Therefore, we recommend that the NP / Design Code includes additional text regarding these matters. Our amended wording addresses:

- sustainable water management;
- the role that landscaping can play in the management of surface water;
- the incorporation of water efficiency measures in the delivery of new dwellings; and
- the need to have regard to existing utilities in the design of a site.

All these matters are critical components which contribute to the achievement of sustainable development.

Sustainable surface water management helps to control the flows and volumes of surface water that enter the public sewer and therefore this control is an inherent component of reducing flood risk and reducing the likelihood of discharges into the region's watercourses from sewer overflows. It is an essential component of ensuring that development contributes to achieving sustainable development.

The landscaping of a site plays an important role in the response to climate change. We request that the landscaping of a site is intrinsically linked to surface water management opportunities and making space for water, which should be undertaken early in the design process.

UW recommends that the Design Code includes a requirement for new dwellings to implement water efficiency measures. The mechanism to secure water efficient development in new housing is via Building Regulations Part G. This includes a tighter standard for water efficiency of 110 litres per person per day (l/p/d) for new residential development which can be implemented through local planning policy where there is a clear need based on evidence (enclosed). Importantly, wider evidence confirms that this tighter standard can be implemented at minimal cost to the developer.

On this basis, we request that Section A1 – Resilience to the climate emergency includes the following amended wording on page 56 of the Design Code:

'Avoid siting homes in ~~high-risk~~ flood risk areas and mitigate increased risk of storms / flooding with sustainable drainage systems. These reduce the amount and rate at which surface water reaches sewers/watercourses. In addition, developments should utilise permeable hard surfacing for driveways and public realm.

All applications must be supported by a strategy for foul and surface water management which applies the surface water hierarchy.

The design of development must incorporate sustainable drainage, which is multi-functional, in accordance with the four pillars of sustainable drainage, in preference to underground piped and tanked storage systems, unless, there is clear evidence why such techniques are not possible. The sustainable drainage must be considered early in the design process and integrated with the landscaping proposals through for example, directing surface water to permeable areas, use of permeable surfacing for driveways and the public realm, tree pits, rain gardens, soakaways, green roofs, and water butts.

All new dwellings must achieve, as a minimum, the optional requirement set through Building Regulations Requirement G2: Water Efficiency or any future updates.'

We request that the Design Code also refers to the need to fully identify, and understand the implications of, any existing utility infrastructure that exists within or near to a site prior to commencing the design process. Such constraints can be material to the site design and deliverability.

Based on the above comments, we recommend the following changes to C2 – Design principles on page 62 of the Design Code:

‘Has the design of the proposals identified and confirmed that existing and proposed services can be incorporated into the design with appropriate offsets from existing services and without causing unacceptable harm to retained features?’

Has the design of the site applied the surface water hierarchy and maximised opportunities to incorporate sustainable drainage and water efficiency measures?’

Policy LE1 The Natural Environment

We note that Policy LE1 states:

- *‘Ensure that new development adjacent to designated environmental assets positively enhance the natural environment by:*
- *Providing a minimum of 10% biodiversity net gain. Where net gain cannot be delivered on site, provision should be secured within the neighbourhood area or as close to the neighbourhood area as possible by:*
- *Incorporating a sufficient buffer between the site and the asset.’*

UUW is concerned that the 2nd and 3rd criteria of this policy do not read logically. Whilst we understand that it may be preferable to incorporate a sufficient buffer, the 3rd bullet point does not logically follow from the 2nd bullet point, which relates to the provision of biodiversity net gain either within the neighbourhood or as close as possible to the neighbourhood.

UUW also wishes to note the importance of any approach to BNG seeking to incorporate flexibility. It is important that BNG is delivered in the most appropriate locations and without restricting the potential future expansion and operation of key operational infrastructure which is often very geographically restricted and critical to meeting future growth and environmental drivers. On-site provision may not be the most appropriate long-term solution for the delivery of BNG when investing in key infrastructure such as water and wastewater assets. BNG should be resilient to future pressures from further development. 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. Whilst it may be preferable to locate BNG at site or within the NP area, we request that any policy requesting BNG includes locational flexibility in accordance with Natural England’s biodiversity metric.

Please 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.

Allocations for New Development

We note that there are no new allocations for development or local green space in the emerging NP. 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.

UW will not allow building over or in close proximity to a water main.

UW 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 UW on the detail of their design and the proposed construction works.

All UW assets will need to be afforded due regard in the design process for a site. This should include (amongst other things) careful consideration of landscaping and biodiversity proposals in the vicinity of our assets, any changes in levels on top of our assets, any proposed highways / crossing points over our assets, or the installation of any new services within the easement for our assets.

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 UW to understand any implications using the below details

Website (including 'Live Chat'): [Building & Developing - United Utilities](#)

Telephone (Monday-Friday, 8am-6pm): **0345 072 6067**

Email:

WATER (water mains, supply and metering):	DeveloperServicesWater@uuplc.co.uk
WASTEWATER (public sewers and drainage):	SewerAdoptions@uuplc.co.uk
SLUDGE PIPELINES	DeveloperServicesWater@uuplc.co.uk

PROPERTY SEARCHES (FOR ASSET MAPS)

The public water and sewer records can be viewed via our online viewing facility for free. Viewings are by appointment only. To book an appointment, the applicant should email propertysearches@uuplc.co.uk or call **0370 751 0101**

Alternatively, a number of providers offer a paid for mapping service, including United Utilities. To purchase a sewer and water plan from United Utilities, visit [Property Searches | United Utilities](#)

UNITED UTILITIES LEGAL SERVICES (FOR EASEMENT DOCUMENTS):

Copies of relevant deeds may be purchased from United Utilities Legal Services. This information is also available from Land Registry.

To purchase a copy of easement documents from United Utilities, please email: LegalServices@uuplc.co.uk

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

Enc. Water Efficiency Evidence