

By email only: neighbourhoods@cheshireeast.gov.uk

Your ref:
Our ref:
Date: 04-SEPT-26

Dear Sir / Madam

Brereton Neighbourhood Plan Review (Regulation 16)

Thank you for consulting United Utilities Water Limited (U UW) on the Regulation 16 version of the Brereton Neighbourhood Plan Review. U UW welcomes the preparation of the Neighbourhood Plan and the effort undertaken by Brereton Parish Council to review and update the existing Plan. Our comments are focused on ensuring that future development is supported by appropriate water and wastewater infrastructure, promotes sustainable water management and reflects national planning policy regarding infrastructure delivery and climate resilience.

Our Assets

It is important that our water and wastewater assets are properly recognised during the design and delivery of development proposals to ensure that existing infrastructure remains protected and operational.

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

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

All U 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 UUW 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

Vision and Objectives

UUW supports the overall Vision and Objectives of the Plan. However, we recommend that the Vision is strengthened to explicitly recognise the importance of climate change resilience and adaptation.

The current Vision refers to delivering high quality development and protecting the rural character of the area. Given the increasing importance of climate adaptation, flood resilience, water resource efficiency and sustainable infrastructure planning, we consider that the Vision should be expanded to state that Brereton will be a community which is resilient and adaptable to the impacts of climate change.

This amendment would better align the Plan with national policy objectives relating to climate change mitigation and adaptation and provide a stronger strategic framework for the more detailed policies contained within the Plan.

Policy HOUS 03: Self-Build Schemes

UUW supports the principle of self-build and custom-build housing where appropriately located. However, we recommend that the policy or supporting text recognises the importance of ensuring that self-build schemes are brought forward in a coordinated manner that is aligned with the provision of water and wastewater infrastructure.

Self-build development is often delivered on a plot-by-plot basis. As such a fragmented approach to infrastructure provision can create challenges for the efficient delivery of water and wastewater services. The policy should therefore require self-build development to be planned and delivered in accordance with an overarching infrastructure strategy. Our recommend wording is:

'Self-build and custom-build development must be planned and delivered in a coordinated and holistic manner in accordance with a site-wide strategy for infrastructure. This is to ensure that fragmented approaches to infrastructure provision are avoided and to ensure that services are delivered efficiently.'

Policy HOUS 04: Preservation of Existing Open Spaces and Recreational Facilities

Policy HOUS 04 refers to areas of recreational use and open space shown on Map 3. Having reviewed Map 3 within Appendix 1, it is difficult to clearly identify the precise location and extent of the spaces referred to by the policy.

For the policy to operate effectively during the determination of planning applications, the Plan should provide mapping at a scale and resolution that enables the identified areas of open space to be clearly distinguished and their boundaries accurately understood.

UUW therefore recommends that Map 3 is amended prior to adoption to improve clarity and provide greater certainty for decision-makers and applicants.

Policy HOUS 07: Design Principles for Brereton

UUW supports the ambition to secure high-quality and sustainable development. However, Policy HOUS 07 currently contains no specific reference to sustainable drainage systems (SuDS) or water efficiency measures.

Given the important role that design plays in addressing climate change, reducing flood risk and supporting sustainable water management, UUW recommends that Policy HOUS 07 is expanded to include specific reference to climate resilience, sustainable drainage and water efficiency. In particular, the policy should require the incorporation of SuDS in accordance with the drainage hierarchy, the management of surface water runoff at source, opportunities for water reuse and rainwater harvesting where appropriate, and measures that promote the efficient use of water resources.

A new criterion could be inserted after criterion 5:

‘Development proposals must incorporate measures which support climate resilience and sustainable water management. Proposals will be expected to demonstrate how they have incorporated sustainable drainage systems in accordance with the drainage hierarchy, managed surface water runoff at source, protected and enhanced water quality, and achieved the tighter optional standard for water efficiency set out in Building Regulations.’

UUW has enclosed supporting evidence to support the application of the tighter water efficiency standard. Incorporating these matters within the design policy would help ensure that new development contributes positively to long-term climate resilience, flood risk management and sustainable water management.

Policy COMMUN 04: Provision of Allotments and Additional Car Parking

UUW wishes to highlight that additional areas of hardstanding can increase surface water runoff and place additional pressure on drainage systems if not appropriately designed.

We therefore recommend that Policy COMMUN 04 requires the use of sustainable drainage measures within any new parking provision. This could include permeable surfacing, infiltration features, swales, rain gardens and other SuDS components that direct surface water to permeable areas and provide opportunities for water quality improvements.

This would help ensure that parking provision is delivered in a manner consistent with sustainable drainage principles and wider environmental objectives.

Our recommended policy wording is:

‘Any proposals for additional car parking must demonstrate how surface water will be managed sustainably. Schemes must incorporate permeable paving and other sustainable drainage features where feasible, directing surface water to permeable areas and providing water quality improvements in accordance with the drainage hierarchy.’

Policy ENVIR 02: Biodiversity and Geodiversity in Brereton

UUW supports criterion (I), which seeks to protect and enhance surface and groundwater quality.

We recommend that this criterion is expanded to explicitly recognise the role that sustainable drainage systems can play in improving water quality and protecting receiving water environments.

Our recommended policy wording is:

‘Protection and enhancement of surface and ground water quality, including through the use of sustainable drainage systems that provide water quality treatment and support wider environmental benefits, ensuring that development does not cause deterioration in the status of inland waters.’

This would align the policy with current best practice in sustainable water management and deliver multiple environmental benefits.

Transport and Infrastructure Chapter

UUW notes that the Transport and Infrastructure chapter currently states that no specific policies are proposed to address utility services.

Whilst we do not consider it necessary to duplicate national planning policy requirements, we encourage the Parish Council to recognise the importance of water and wastewater infrastructure within this section of the Plan.

The 2026 National Planning Policy Framework requires substantial weight to be given to the need to support and upgrade public service infrastructure, including water supply and wastewater infrastructure. Rather than introducing a detailed standalone policy, we suggest that supporting text is added to the chapter to acknowledge that:

‘The timely provision, maintenance and upgrading of water supply and wastewater infrastructure is important to the sustainable growth of the Parish. The Parish Council will support the timely delivery of any improvements required to serve new development or deliver environmental improvements.’

This approach would recognise the importance of utility infrastructure, support investment where required and maintain consistency with national planning policy without unnecessarily repeating national requirements.

Summary

Uuw supports the overall direction of the Brereton Neighbourhood Plan Review and recommends that the Plan be amended to:

1. include explicit reference to climate change resilience and adaptation within the Vision;
2. ensure self-build development is delivered in accordance with a strategy for water and wastewater infrastructure provision;
3. improve clarity of Map 3 relating to protected open spaces;
4. incorporate sustainable drainage and water efficiency considerations within Policy HOUS 07;
5. require SuDS and permeable drainage solutions within Policy COMMUN 04;
6. strengthen Policy ENVIR 02 by recognising the water quality benefits of sustainable drainage; and
7. recognise the importance of water and wastewater infrastructure investment within the Transport and Infrastructure chapter, reflecting current national planning policy.

Subject to the above amendments, Uuw supports the overall direction of the Neighbourhood Plan and welcomes continued engagement with the Parish Council and Cheshire East Council as the Plan progresses.

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 MRTPI
Strategic Planning and Sustainability
United Utilities Water Limited

Encs.

Evidence Submitted by United Utilities Water Limited to Justify the Implementation of the Optional Standard for Water Efficiency in Part G of Building Regulations

Water Resources West - WATER EFFICIENCY IN NEW HOMES - Evidence to support adoption of the Building Regulations Optional Requirement for local authorities in North West England and the Midlands