

By email only: localplan@cheshireeast.gov.uk

Your ref:

Our ref:

Date: 01-SEP-26

Dear Sir / Madam

Cheshire East Local Plan Scoping Consultation

Introduction

Thank you for consulting United Utilities Water Limited (UUV) on the Cheshire East Local Plan Scoping Consultation. UUV welcomes the opportunity to engage with Cheshire East Council at this early stage of plan preparation and looks forward to working positively with the Council throughout the development of the new Local Plan. UUV wishes to build a strong partnership with the Council to support the preparation of a sound, sustainable and deliverable Local Plan. Early and ongoing engagement between local planning authorities and infrastructure providers is important to ensure that growth and infrastructure planning are appropriately aligned and that future development can be supported in a sustainable manner.

Infrastructure considerations are an important component of sustainable development and should inform plan-making alongside wider social, environmental and economic objectives. Whilst infrastructure constraints are generally expected to arise by exception rather than as a widespread issue, there may be circumstances where growth and infrastructure investment need to be coordinated to support sustainable and deliverable outcomes.

The Local Plan also presents an important opportunity to embed climate resilience, sustainable water management and water efficiency throughout the development strategy whilst supporting the protection of water quality, water resources and essential utility infrastructure.

Cheshire East's extensive river catchments, environmental assets and varied urban and rural communities mean that the sustainable management of water should be a key consideration in the preparation of the Local Plan. The Plan presents an important opportunity to align future growth with the delivery of water, wastewater and drainage infrastructure; improve water quality; support the removal of surface water from the sewer network where opportunities arise; increase resilience to flood risk and climate change; and protect and enhance the borough's wider blue-green infrastructure network.

We encourage the Council to direct developers to our **pre-application service** to discuss proposals and identify any potential constraints at an early stage by contacting:

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

To supplement this response, we have enclosed an **Appendix** providing supporting information and example policy wording for consideration during the preparation of the new Local Plan. Please note that we are in the process of updating this supporting document to reflect the latest changes to the National Planning Policy Framework.

Please ensure that regard is had to both the main body of this letter and the associated supporting information, which includes recommended policy approaches, and supporting water efficiency evidence.

Scope of the New Local Plan

UUW supports the broad scope proposed for the new Local Plan. The emerging Plan should recognise the fundamental role that water and wastewater infrastructure plays in facilitating sustainable development and supporting healthy, resilient communities. Infrastructure considerations should be integrated throughout plan preparation, including the development of the spatial strategy, site allocation process, infrastructure planning, climate resilience policies and delivery framework.

The evidence base supporting the Local Plan should include appropriate engagement with infrastructure providers from the earliest stages of plan preparation to ensure that infrastructure requirements, constraints and opportunities are properly understood.

Vision and Strategic Objectives

UUW supports the inclusion of strategic objectives relating to sustainable growth, climate resilience, environmental protection and infrastructure delivery.

We recommend that the Vision and Strategic Objectives recognise:

- the role of infrastructure in supporting sustainable growth;
- climate resilient communities;
- sustainable water management;
- water efficiency;
- resilience to flooding and drought;
- protection of water resources and water quality;
- support for investment in essential water and wastewater infrastructure;
- multifunctional blue-green infrastructure;
- improved water quality across local catchments;
- resilience to all forms of flood risk; and
- protection and enhancement of river catchments.

The Council should also consider including a specific objective relating to infrastructure planning and delivery to ensure that growth aspirations are supported by a robust understanding of infrastructure requirements throughout the plan period.

Suggested Vision Wording

‘Cheshire East will be a climate resilient borough where sustainable growth is supported by high quality infrastructure, efficient use of natural resources, resilient water supplies and sustainable wastewater services. The borough's environmental assets will be protected and enhanced through integrated water management, biodiversity enhancement and the delivery of multifunctional blue-green infrastructure. Future development will be designed to support resilience to flooding, drought and climate change whilst making efficient use of water resources and contributing towards improvements in environmental quality and public wellbeing. The borough will positively support investment in essential water and wastewater infrastructure necessary to facilitate sustainable development and improve environmental outcomes throughout the plan period.’

Spatial Strategy

UUW considers that the spatial strategy will be one of the most important elements of the new Local Plan. Cheshire East contains a diverse range of settlements, including market towns, service centres, villages and rural communities. Decisions regarding the distribution of development will therefore have significant implications for infrastructure planning and service provision.

UUW supports a plan-led approach that directs development towards sustainable locations whilst taking account of infrastructure considerations alongside economic, social and environmental factors.

Infrastructure should not be considered in isolation and should not determine the spatial strategy. However, infrastructure requirements, opportunities and delivery implications represent important evidence that should inform decisions regarding the location and distribution of growth.

The Council should ensure that spatial strategy options are assessed against infrastructure evidence to understand their respective implications for water and wastewater service provision. Particular consideration should be given to:

- the cumulative effects of growth;
- the relative sustainability of different growth options;
- infrastructure delivery requirements;
- long-term service resilience; and
- the ability to coordinate development and infrastructure investment.

Given the extensive rural nature of parts of Cheshire East, growth distribution decisions may have differing infrastructure implications than comparable growth within the Borough's larger urban areas. The Local Plan should therefore be informed by a realistic understanding of infrastructure requirements and deliverability.

Housing Growth and Site Allocations

UUW supports the allocation of sufficient land to meet identified development needs through a clear and robust development strategy.

The Plan should seek to provide certainty regarding the location and scale of future growth. This assists infrastructure providers in planning future investment requirements and enables potential infrastructure needs to be identified and addressed at an early stage.

Allocated sites generally provide significantly greater certainty than reliance upon unplanned development opportunities. This supports:

- effective infrastructure planning;
- timely investment decisions;
- identification of network reinforcement requirements;
- coordination of infrastructure delivery; and
- consideration of sustainable water management measures from the outset.

The allocation process should therefore be supported by infrastructure evidence to ensure that sites remain deliverable throughout the plan period. Where significant strategic allocations are proposed, infrastructure requirements should be considered as part of the site's overall development strategy.

The Council should recognise that fragmented land ownership can, in some circumstances, create challenges for the coordinated delivery of development and supporting infrastructure. Where multiple land interests are involved, there can be additional complexity in securing comprehensive masterplanning, infrastructure corridors, surface water management measures and the timely provision of utility infrastructure. As part of the site assessment and allocation process, the Council should therefore have regard to the extent to which sites can be brought forward in a coordinated and deliverable manner, supported by the infrastructure necessary to achieve sustainable development.

The Local Plan should make use of site-specific allocation policies where appropriate to identify the key requirements associated with the development of individual sites. Site-specific policies provide an opportunity to clearly set out infrastructure, environmental and delivery expectations from the outset and can help ensure that development is brought forward in a coordinated and comprehensive manner. This may include requirements relating to water and wastewater infrastructure, sustainable drainage, flood risk, water efficiency, green and blue infrastructure, environmental mitigation and other measures necessary to support sustainable development. By providing greater certainty regarding the requirements for development, site-specific policies can help support effective infrastructure planning, improve deliverability and assist in securing sustainable development outcomes throughout the Plan period.

Infrastructure Planning and Delivery

UUW welcomes the opportunity to engage at this early stage of plan preparation and would highlight recent changes to national planning policy relating to water and wastewater infrastructure. The National Planning Policy Framework places increased emphasis on the importance of infrastructure planning and investment in supporting sustainable development. In particular, national policy recognises the critical role of water and wastewater infrastructure in facilitating growth and supporting the delivery of homes, employment and wider economic development.

The Council should have regard to the changes introduced through the revised National Planning Policy Framework which require substantial weight to be given to the benefits associated with proposals involving water supply and wastewater infrastructure. This reflects the essential role

such infrastructure plays in supporting sustainable development, environmental improvement, public health and economic growth.

A clear and robust allocation strategy will also assist infrastructure planning by providing greater certainty regarding the location, scale and timing of future development. Planned growth enables infrastructure requirements to be understood at an earlier stage and supports more effective coordination between development and infrastructure delivery than growth arising through unplanned or speculative development opportunities.

Given the significant increase in housing need identified for Cheshire East, it will be important that the Local Plan is supported by early and ongoing engagement with infrastructure providers, including UUW, to ensure that infrastructure requirements are properly understood and reflected throughout the plan-making process. The Local Plan should recognise that the timely delivery of water and wastewater infrastructure is an important component of sustainable growth and that investment may be required to facilitate development, support environmental improvements and maintain resilient services. Infrastructure planning should therefore be integrated throughout plan preparation to ensure that development aspirations and infrastructure delivery can be appropriately coordinated.

Once site-specific requirements and delivery trajectories become clearer, there may be circumstances where development and infrastructure delivery need to be coordinated to ensure that appropriate infrastructure is available to serve growth.

The Council should also have regard to recent changes to national Green Belt policy. National planning policy now provides greater recognition of the role of essential infrastructure in the Green Belt, including water and wastewater infrastructure. The revised Framework confirms that certain forms of engineering and other operations, together with infrastructure required for water and wastewater purposes, may not be inappropriate development in the Green Belt provided they preserve its openness and do not conflict with the purposes of including land within it. The Local Plan should therefore ensure that locally-specific Green Belt policies do not create unnecessary barriers to the delivery, maintenance, upgrading or expansion of essential water and wastewater infrastructure where such development is required.

Investment in water and wastewater infrastructure should not be viewed solely as a mechanism for accommodating growth. Infrastructure investment can also support wider environmental objectives through improvements to wastewater treatment facilities, network resilience, sustainable drainage initiatives and partnership-led integrated water management projects. Such measures can contribute towards reducing surface water inflows to wastewater systems, improving climate resilience, enhancing water quality and supporting wider objectives to reduce storm overflow operation and sewer spills in accordance with the Environment Act 2021.

The Local Plan should provide an appropriate framework for coordinating growth and infrastructure provision. The Plan should therefore recognise that:

- infrastructure requirements may vary between locations;
- infrastructure improvements may be required to support development in some circumstances;
- infrastructure providers should be engaged throughout plan preparation; and
- development and infrastructure delivery may need to be coordinated where necessary.

This would assist in ensuring that growth remains sustainable and deliverable throughout the Plan period.

Water Supply and Water Efficiency

The Local Plan should seek to promote the efficient use of water resources. U UW supports the inclusion of policy requirements that seek to achieve high standards of water efficiency in new development.

The Council should have regard to the evidence contained within U UW's latest Water Resources Management Plan (WRMP24), which identifies water efficiency and demand reduction as key components of a long-term, sustainable approach to water resource management across the Strategic Resource Zone, U UW's principal water supply area serving the vast majority of customers across the North West of England. WRMP24 supports reductions in water consumption to 110 litres per person per day by 2050 as part of a wider package of measures aimed at improving the resilience and sustainability of water supplies.

In accordance with the evidence contained within WRMP24 and wider regional and national water resource planning objectives, U UW considers it appropriate for the Local Plan to require a water efficiency standard of 110 litres per person per day for all new residential development across Cheshire East. The Council should also support opportunities for water reuse through measures such as rainwater harvesting and greywater recycling where appropriate. In addition to reducing potable water demand, these measures can form part of an integrated approach to sustainable water management by helping to manage surface water close to where it falls, consistent with the surface water hierarchy and the principles underpinning the latest Non-Statutory Technical Standards for Sustainable Drainage Systems.

Improving water efficiency will contribute towards the sustainable management of water resources, support wider climate resilience objectives and help reduce water consumption and customer water bills. It also assists in reducing future demand for water resources and the scale of investment that may otherwise be required to maintain long-term water supply resilience.

Sustainable Water Management and Flood Risk

U UW strongly supports a coordinated and integrated water management approach through the Local Plan. Water supply, wastewater infrastructure, drainage, flood risk management, green infrastructure and environmental outcomes are closely interrelated and should be planned in a coordinated manner.

Climate change is expected to increase the frequency and intensity of rainfall events. This has the potential to increase the volume and rate of surface water entering drainage systems, placing additional pressure on wastewater networks and increasing flood risk. The Local Plan can help address these challenges through policies that support sustainable drainage systems, blue-green infrastructure, natural flood management, watercourse restoration and opportunities to manage surface water above ground wherever appropriate.

The Local Plan has an important role to play in supporting these outcomes. Through effective place-making, development design and strategic infrastructure planning, new development should seek to manage surface water sustainably and minimise unnecessary connections to the wastewater network. An integrated water management approach can contribute to reducing flows within sewer systems and support wider partnership objectives to reduce storm overflow operation and sewer

spills in accordance with the objectives established through the Environment Act 2021 and related regulatory requirements.

The Council should consider how planning policy can support integrated water management outcomes through requirements for sustainable drainage, multifunctional green infrastructure, surface water separation where feasible, catchment-based approaches and early engagement between developers, the Council, Lead Local Flood Authority and United Utilities. Such measures can help ensure that growth is delivered in a manner that supports both environmental improvement and the long-term resilience of water infrastructure.

The Local Plan should support the application of the drainage hierarchy and encourage sustainable drainage solutions that manage surface water as close to source as possible. This should include the use of Sustainable Drainage Systems (SuDS), multi-functional blue-green infrastructure, surface water attenuation and water quality improvements, alongside measures that support climate resilience and foul-only drainage approaches wherever practicable. Sustainable drainage should be considered at the earliest stages of development design to maximise environmental and infrastructure benefits.

Climate Change and Resilience

UW supports the inclusion of strong climate adaptation and resilience policies within the new Local Plan.

The effects of climate change will increasingly influence how places are planned and developed. The Local Plan should therefore encourage development that is resilient to future climate conditions and incorporates appropriate adaptation measures from the outset.

Water management has an important role to play in supporting climate resilience through:

- water efficiency;
- drought resilience;
- protection and enhancement of the water environment;
- resilient water and wastewater infrastructure; and
- sustainable design measures that support adaptation to changing climatic conditions.

The Local Plan should support development that contributes towards the long-term resilience of communities, infrastructure and the environment whilst recognising the role that effective water management can play in achieving these outcomes.

Evidence Base

The evidence base should support an understanding of how water and wastewater infrastructure considerations interact with growth options, site allocations, delivery assumptions and infrastructure investment planning to inform the development of a sound, deliverable and sustainable spatial strategy.

UW welcomes the opportunity to assist Cheshire East Council in developing the evidence base supporting the Local Plan. The evidence base should support an understanding of how infrastructure considerations interact with growth options, site allocations and delivery assumptions to inform the development of a sound and deliverable spatial strategy.

The Council should engage directly with UUW regarding water and wastewater matters to ensure that the evidence base reflects the latest available information relating to:

- water supply and wastewater infrastructure;
- sewer and reservoir flood risk, which should inform future Strategic Flood Risk Assessment work; and
- the latest evidence contained within the Water Resources Management Plan 2024 and any subsequent updates.

The Council should also engage with UUW when considering the implications of planned growth for water and wastewater infrastructure, including any requirements arising from the Local Plan strategy and the potential need for future infrastructure investment.

As statutory water and wastewater undertaker, UUW is best placed to provide advice on existing infrastructure, network and treatment capacity, growth implications, infrastructure planning and investment requirements. The preparation of water and wastewater evidence should therefore be undertaken in consultation with UUW rather than relying solely on third-party assessments or assumptions regarding infrastructure capacity.

Early and ongoing engagement will help ensure that infrastructure considerations are accurately understood and appropriately reflected within the evidence base, site assessment process, spatial strategy and wider plan-making decisions.

Safeguarding Infrastructure Assets

The Local Plan should contain an appropriate policy framework to safeguard existing water and wastewater infrastructure. Development proposals should take account of operational assets and ensure that appropriate access, easements and protection measures are maintained.

Where diversion of infrastructure is proposed, this should be addressed through early engagement with UUW and considered as part of site deliverability and design processes. UUW does not object in principle to infrastructure diversion where appropriate engineering solutions can be identified and operational requirements can continue to be met.

Summary

UUW supports the preparation of a new Local Plan that promotes sustainable, deliverable and resilient growth across Cheshire East. In particular, the emerging Plan should:

- adopt a clear and robust plan-led strategy for growth;
- ensure that infrastructure planning and delivery considerations inform spatial strategy decisions;
- support allocation-led growth that provides certainty for infrastructure planning;
- facilitate coordinated infrastructure delivery where necessary;
- promote sustainable water management and SuDS;
- require high standards of water efficiency, including a residential water consumption standard of 110 litres per person per day;
- support climate resilience and environmental protection;
- safeguard existing infrastructure assets; and
- engage directly with UUW in the preparation of the evidence base.

The new Local Plan presents an important opportunity to embed climate resilience, sustainable water management and water efficiency throughout the development strategy. This is particularly important given Cheshire East's extensive river catchments, varied urban and rural communities, and the increasing challenges associated with climate change, water quality, water resource management and flood risk from all sources.

Climate adaptation should be treated as a golden thread running throughout the Plan and supported by robust application of the drainage hierarchy, multifunctional sustainable drainage systems, blue-green infrastructure, nature-based solutions and effective management of water resources. These measures can help deliver multiple benefits including improved flood resilience, enhanced biodiversity, improved water quality and increased community wellbeing.

Infrastructure considerations are an important component of sustainable development and should inform plan-making alongside wider environmental, social and economic objectives. The timely provision of water and wastewater infrastructure can play a critical role in facilitating growth, supporting environmental improvements and maintaining resilient services. Development can generally be accommodated most effectively where existing infrastructure has available capacity or where infrastructure improvements can be planned and delivered in a coordinated manner.

The Plan should recognise the strategic importance of water resources, water quality, essential utility infrastructure and coordinated infrastructure planning whilst supporting investment required to improve environmental outcomes, enhance resilience, protect public health and facilitate sustainable development.

The Council's emerging Local Plan presents an opportunity to align future growth with wider objectives around integrated water management, climate resilience and environmental improvement. Through ongoing collaboration between the Council, UuW and other stakeholders, new development can contribute towards reducing surface water inputs to wastewater networks, supporting future investment strategies, improving resilience and helping to deliver the environmental outcomes sought through the Environment Act and related regulatory programmes. This will help ensure that growth is supported by resilient infrastructure whilst delivering wider benefits for communities and the environment.

The Council is invited to have regard to the detailed recommendations contained within the enclosed 'Supporting Information and Recommended Policies for Local Plan Preparation', and UuW would welcome the opportunity for continued engagement as the Local Plan progresses.

UuW looks forward to continuing to work with the Council throughout preparation of the Local Plan and supporting evidence base. In the meantime, 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
Asset Management
United Utilities Water Limited

Enc. Supporting Information and Recommended Policies for Local Plan Preparation

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