
Subject: Wyre Local Plan
Attachments: Site Allocations - Forton Hollins Lane - Drainage MODsv3.docx

Thanks Andrew,

I have amended the attached with relation to site SA1/14. Thanks for pointing out the error.

I will submit to the Inspector tomorrow, the attached document an your position as set out in the e mail below, which will also be entered in the examination library.

Kind Regards

Réa

Hi Rea

Thank you for your email. I have addressed each matter in turn below.

Various Allocations - Approach to Surface Water

With respect the attached, United Utilities is pleased to see the inclusion of the wording *'The development should be supported by a drainage strategy for the whole allocation to meet the needs of the development.'* I think however, you may have incorrectly worded your Proposed Amendment for SA1/14 – North of New Holly Hotel and Bodkin Cottage, Hollins Lane.

With respect to including additional wording regarding no surface water shall connect to the public sewer, I note your comments. **As an alternative, United Utilities would still prefer a form of words within the site specific policy or justification text which makes the expectation clear that a surface water discharge to the existing public sewer should be avoidable if landowners work together as part of a wider drainage strategy.**

Forton Extension - Timing for Delivery of Infrastructure

United Utilities is disappointed at the position you are adopting. **We confirm that we retain a preference for policy provision which ensures any connection to the public sewer from the Forton Extension is in accordance with a timetable to be agreed with UUW which ensures appropriate wastewater infrastructure is in place to meet the needs of the development.** We believe such a position is supported by the NPPG in the paragraph in our earlier email exchange.

We retain this position because at this stage there is an absence of detail on the approach to drainage. Without this detail we are not able to fully clarify the impact on our wastewater assets. This detail often only becomes available when the full detail of a drainage proposal is submitted which may only be available at the technical details stage. The details include the point of connection to the public sewer, the approach to surface water drainage and any approach to pumping that may be required. It will also be important to understand the rate at which development is occurring in the wider settlement. The absence of details over the approach to surface water drainage is particularly relevant as surface water flows are much larger than foul flows. The flows that arise from a surface water connection can be far greater than any foul connection and would therefore have a greater impact on the capacity of the public sewer. This is particularly relevant bearing in mind the existing supporting drainage network in Forton is proportionate to the size of Forton as a settlement.

The uncertainty over the approach to surface water drainage is illustrated in the recent submission of an outline application for 210 dwellings by Hollins Strategic Lane (application reference 18/00469/OULMAJ). The submitted

Flood Risk Assessment and Drainage Management Strategy dated May 2018 includes uncertainty over the approach to surface water drainage as it presents three options for the management of surface water. One of these options includes partial discharge of surface water to the public combined sewer at a significant rate which is far greater than any foul connection. This is exactly what it is critical to avoid for any future development in Forton. For ease of your reference, a copy of the submitted Flood Risk Assessment and Drainage Management Strategy can be seen at the following link.

<https://publicaccess.wyre.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=P8K211SD04M00>

We believe this uncertainty in approach to drainage justifies the case for policy provision which we have requested. We therefore strongly recommend that you give the inclusion of such policy provision further consideration.

Fleetwood Docks and Marina

With respect to Fleetwood Docks and Marina, we remain concerned about the use of the word 'adjacent' and ***therefore we would prefer the policy to explicitly state that the distance between any residential properties and the wastewater treatment works should be maximised in any masterplan that is prepared.***

Given the outstanding matters on which we continue to disagree, I would be grateful if you could share this correspondence with the Inspector for his consideration.

Please do contact me if you wish to discuss.

Best regards – Andrew

Andrew Leysens
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Hi Andrew,

Thank you for your e mail.

Please see attached a slightly altered proposed modification to the Local Plan which tightens the requirement for the preparation of a drainage strategy. As you can see the requirement for a drainage strategy will be in the policy.

I note your preference for the LP to prevent discharge of surface water to the existing public sewer, however you have previously advised that developers have the right to connect. As you are aware the Local Plan includes a hierarchy that stipulates that connection to the public sewer will be the last resort once all other options have been wholly or in part exhausted.

In relation to specific connections this will be a matter for a condition of a planning application. I have asked previously whether UU would advise whether specific phasing should apply, which will need to be defended at the hearing. However UU at our last meeting advised against it because of the 'right to connect'.

Forton and Hollins Lane are being discussed tomorrow morning. The attached is the extent that I think the Local Plan should be amended. I would be grateful if you would confirm that the proposed amendments will address your concerns, albeit in part so that I can advise the Inspector.

I am happy to submit to Inspector our exchange of emails in the last week or so, if you consider that your other points should be put to the Inspector.

Fleetwood was discussed yesterday. I note your suggested wording but I consider that the Local Plan adequately addresses this issue.

Kind Regards

Réa

Hi Rea

Thank you for your email. I hope the examination is going well. I would be happy to discuss the points you raise today as I do have comments on the approach you suggest. My initial comments for your consideration are below.

1. Hollins Lane Allocations

I note your comments with respect the planning permissions in place on Hollins Lane and understand the position you are adopting in the circumstances. That being said, we feel the allocations in Forton and Hollins Lane would have been more appropriately dealt with as part of one settlement wide masterplan.

2. Forton Extension Allocation

a. Allocation Wide Drainage Strategy

We are fully supportive of the masterplan requirement for this allocation within criterion 1 of Policy SA3/4, which is expanded upon in Paragraphs 9.1.5 and 9.1.6 of the submission draft.

Our strong preference is for the masterplanning to address the approach to drainage infrastructure through an allocation wide drainage strategy for the Forton Extension. The drainage strategy would be one key component of the masterplanning exercise. It would help to ensure that each site has an approach to drainage that fits together as part of a wider drainage jigsaw. We believe that drainage should be a key component of any allocation wide masterplan exercise and we would prefer this to be clearly referenced in the policy for the Forton allocation.

We would also prefer the allocation to clearly state that no surface water shall discharge to the existing public sewer from the Forton Extension.

b. Timing for Delivery of Infrastructure

We would also like to confirm that we retain a preference for policy provision which allows us, if necessary, to ensure that the timing for the delivery of the development is co-ordinated with any infrastructure improvements that may be required. This is reflective of Paragraph: 020 Reference ID: 34-020-20140306 of the NPPG which states:

'The timescales for works to be carried out by the sewerage company do not always fit with development needs. In such cases, local planning authorities will want to consider how new development can be phased, for example so it is not occupied until any necessary improvements to public sewage treatment works have been carried out.'

My understanding of the latest position with respect to applications that have been submitted in respect of the Forton Extension is that there are now outline applications in Forton for 46 units (unallocated), 147 units (allocated) and 210 units (allocated).

Whilst I acknowledge that any timing matter would be dealt with by condition, we consider it appropriate to continue to request policy provision which supports any future condition that may be attached. As per our previous correspondence, our preference is for policy provision which ensures any connection to the public sewer from the allocated sites in Forton at the extension is in accordance with a timetable to be agreed with U UW which ensures appropriate wastewater infrastructure is in place to meet the needs of the development.

3. Fleetwood

With respect to Fleetwood, our key concern is that we wish to see any new residential properties that you have allocated for this site to be located as far away from the treatment works as possible. We think this is different from the original wording which states no housing adjacent to the treatment works. Perhaps we can further discuss and agree some suggested wording.

I look forward to hearing from you soon.

Kind regards – Andrew

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Hi Andrew,

I had now had chance to consider your suggested modifications with reference to drainage in Forton and Hollins Lane.

As you might be the sites at Hollins Lane have planning permissions. It is not possible to link the drainage strategy for the Forton extension to that of the allocations at Hollins Lane. I have added a requirement for a drainage strategy for each of the allocations. Please see attached. You will see that there is no reference to a 'settlement wide drainage strategy'. I do not think that this will be appropriate. The development is only required to deal with matters arising from the development.

Furthermore your suggestion regarding connection to the public sewer reads to me more like a condition on a planning application rather than a policy.

Can you please confirm that the proposed amendments meet your concerns? I will discuss further with the barrister the appropriateness of your other suggestions regarding drainage at Forton / Hollins Lane.

In relation to Fleetwood Dock, my view is that KDC 7 is clearer and stronger than what you are suggesting. Also modifications are made in response to issue raised by the Inspector or in discussion or to correct an error.

I will come back to you following discussion with the barrister tomorrow. It would be useful if we can come to an agreement on the wording before Thursday if possible.

Kind Regards

Réa

Hi Rea

Thanks for confirming receipt. Thank you also for confirming acceptance of the suggested amendment.

I wondered if I could also suggest an amendment to the policy on Fleetwood Docks. This currently says no housing adjacent to the treatment works. Our preference would be for policy to state:

'The layout of the development for Fleetwood Dock and Marina shall be such that the distance between the existing wastewater treatment works and any proposed new dwellings is maximised.'

I hope you can find some time to relax this weekend in preparation for the next two weeks.

Best regards – Andrew

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Thanks Andrew

The statement is useful and clearly supports our overall approach to masterplanning which is opposed by developers, as well as indicating that we have worked together.

I shall draft a proposed modification to the policy to cover your suggestions next week and certainly prior to the session covering Forton.

Kind Regards

Réa

Good morning Rea

Please find attached a copy of a statement from United Utilities regarding the growth proposed in Forton.

I would be grateful if you can confirm receipt. This statement is also copied to the programme officer.

Many thanks – Andrew

Andrew Leysens
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Good afternoon Rea

I wanted to confirm that we have prepared a draft statement regarding Forton. We anticipate this being with you early tomorrow.

If you would like to discuss, please let me know.

Best regards – Andrew

Andrew Leyssens
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