



Allerdale Borough Council

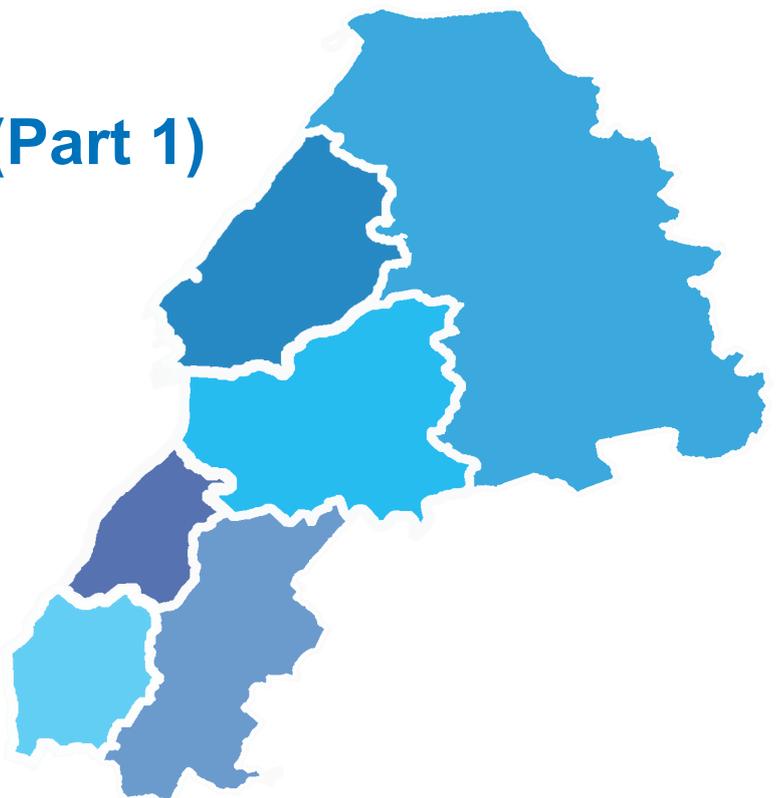


Allerdale Local Plan (Part 1)

Position Statement Main Matter 10:

Water supply and the
effect of development
upon water quality

January 2014



Allerdale Local Plan (Part 1) Examination – Allerdale Borough Council Position Statement January 2014

Matter 10 - Water supply and the effect of development upon water quality

Introduction

1. This Statement has been produced by Allerdale Borough Council to outline its response to the matters raised by the Inspector for the Hearings [ED3] into the Submitted Allerdale Local Plan (Part 1) Development Plan Document (DPD) [CD1].
2. These Statements form the main basis for the Council's submission to the Hearings. They relate to the elements of the DPD that have been raised by the Inspector as matters to be discussed. Where appropriate the Statements draw upon and cross-refer to the main sources of information used in the preparation of the DPD such as the outcomes of public consultation, the Sustainability Appraisal, the evidence base and the supporting Topic Papers. Core Document numbers are given where appropriate.

Position of the Council regarding Matter 10

3. The Council has worked closely with United Utilities, Natural England and the Environment Agency to ensure that the water supply deficit is addressed and water quality is maintained and improved. This is achieved through policy support for the implementation of infrastructure improvements, phasing of development and the incorporation of water conservation measures and sustainable drainage systems in new development. This package of measures is considered to be a sound approach and will ensure development is sustainable and protects the water environment.

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quality**

Water Supply

4. Currently the water supply for Allerdale comes from a number of sources one of which is Ennerdale Lake. Given the sensitivity of the habitats, particularly with respect to the River Ehen, the current water abstraction licence for Ennerdale Lake is under review by the Environment Agency. The West Cumbria Resource Zone is self contained and separate from the North West Integrated Resource Zone and therefore has to be self sustaining in terms of supplying West Cumbria. There are limited alternative water sources in West Cumbria.
5. Due to the anticipated reduction in abstraction from Ennerdale Lake United Utilities Draft Water Resource Management Plan 2013 identifies a water supply deficit for West Cumbria from 2014/15 [**CD7** and **DSE 4**]. A number of solutions have been identified; the preferred one being a pipe connection to Thirlmere to allow West Cumbria to join the North West Integrated Zone. This has the advantage of securing a sustainable supply especially in terms of drought management and flexibility of supply.
6. Although not identified as critical infrastructure in the Strategy for Infrastructure [**CD7** and **DSE4**], until a long term solution is implemented United Utilities are using additional water supplies from boreholes in Copeland, implementing a programme to reduce leaks and promoting water efficiency measures. The Water Resource Management Plan is also forecasting a drop in demand for water over the next 25 years.

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7. As set out in Matter 1 the Council has worked proactively with United Utilities, Copeland Borough Council and the Environment Agency to secure a sustainable water supply.

The Local Plans role in addressing the water supply deficit

8. As mentioned above the Local Plan addresses the water supply deficit in two areas; supporting the delivery of infrastructure and promoting water conservation measures in new development. The delivery of infrastructure is supported in the Local Plan by the following objective, policies and proposed amendments

- **Objective SO5c**
- **Policy S2 Sustainable Development Principles** including proposed amendment **MM10 [CD4]**
- **S3 Spatial Strategy and Growth-** including proposed amendment to Paragraph 80 **MM14 [CD4]**
- **Policy S5 Development Principles-** including proposed amendment **MM18 [CD4]**
- **S6 Area Based Policies-** including proposed amendments **MM24, MM29, MM42 and MM47 [CD4]**
- **S23 Supporting and Safeguarding Strategic Infrastructure-** including proposed amendment **MM72 [CD4]**

DM12 Sustainable Construction

9. In response to the water supply issues facing West Cumbria, and to compliment United Utilities own water conservation measures, this policy introduces the

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requirement to incorporate water conservation measures into the design of new development. The Council is aware that this could be seen as an additional burden, however, given the particular local issue faced by West Cumbria it is considered justified to require this element of the Code for Sustainable Homes to Level 4.

Water Quality

10. The Habitats Regulation Assessment (HRA) highlights the issue of water quality as a matter that should be taken through to Appropriate Assessment in respect of the Solway Firth SAC and the River Derwent and Bassenthwaite Lake SAC. The issues relate to potential increase wastewater discharges, additional potential sources of pollution due to increase surface run off from development, increased sedimentation resulting from construction activity and increase abstraction from water courses. The HRA highlighted that the particular areas of concern were Silloth, due to its proximity to the Solway Coast, and Cockermouth due to capacity constraints at the treatment works and run –off in to the River Derwent SAC.

The Local Plan approach to safeguarding and improving water quality

Strategic Objectives SO5c, SO5d and SO6d

11. These objectives promote the protection and enhancement of general infrastructure as well as green infrastructure. It also ensures high levels of water quality are maintained and improved.

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Policy S2 Sustainable Development Principles

12. This policy promotes, as part of delivering sustainable development, the use of Sustainable Urban Drainage Systems; the protection of water quality as well as ensuring that appropriate infrastructure is in place to support development.

Policy S29 Flood Risk and Surface Water Drainage

13. This policy requires that surface water and foul drainage is separated to remove pressure from the foul drainage system. The Council expects all new development to consider the incorporation of permeable surfaces; water storage and Sustainable urban drainage systems. Paragraph 283 ensures that developers have regard to a drainage hierarchy for disposing of surface water. The preferred option is to mimic the site's current natural discharge process.

Policy 32 Safeguarding Amenity

14. This policy specifically provides safeguards to ensure development does not cause pollution to the water environment or a deterioration of the Water Framework Directive Classification Status.

Policy S36 Air Water and Soil Quality

15. This policy re-enforces the theme of protecting water quality. Under this policy development that has a demonstrable direct and/or indirect adverse impact on the chemical composition and quality of water bodies in the Plan area or on The Water

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Framework Directive and the status of a watercourse will be resisted unless adequate mitigation measures are in place.

Policy DM12 Sustainable Construction

16. This policy reinforces the use of sustainable urban drainage systems in all development.

Water Abstraction

17. The policy response to water abstraction has been covered in relation to water supply issues outlined above

Appropriate Assessment Conclusions for Water Quality

18. The Appropriate Assessment concludes that satisfactory mitigation is provided in the Local Plan to safeguard water quality. In particular:
- The use of Sustainable Urban Drainage systems in new development will help to reduce the rate of surface water run off and potential source of pollution.
 - The amendment to policy S5 **MM18** and paragraph 80 **MM14 [CD4]** ensures that appropriate infrastructure is in place to support development such as wastewater treatment capacity and adequate water supply. These measures minimise the impact of polluting discharges and increased water abstraction.

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- The use of construction management plans will help to minimise the impact of development practices close to water courses. These are routinely requested as a condition of planning consents.
 - The Environment Agency operates strict consenting regimes that controls discharges to water courses.
19. With respect to the issues identified at Silloth the HRA highlights that the source of pollution from surface water run off is agricultural as opposed to development. In addition the level of growth planned for Silloth is unlikely to impact on water quality. Cockermouth's waste water treatment works has capacity issues however plans are well advanced by United Utilities to overcome this [**CD7 DSE4**]. In addition policy in the local plan ensures that appropriate infrastructure is in place and development will be phased accordingly.
20. Based on the combination of these measures the development proposals contained in the Local Plan are considered not to have an adverse effect on water quality.