

By email only: kerry.trueman@allerdale.gov.uk

Planning Policy
Development Services
Allerdale Borough Council
Allerdale House
Workington
Cumbria
CA14 3YJ

Your ref:
Our ref: DC/14/862
Date: 14 March 2014

Dear Sir / Madam

**ALLERDALE LOCAL PLAN (PART 1): PRE SUBMISSION DRAFT
SUBMITTED DOCUMENT INCLUDING THE COUNCIL'S PROPOSED MODIFICATIONS
(FEBRUARY 2014)**

Thank you for the opportunity to comment on the Allerdale Local Plan (Part 1): Pre-submission Draft Submitted Document including the Council's Proposed Modifications. United Utilities is very keen to engage with the council on the preparation of the local plan. We only have minor comments to make on the proposed modifications which are set out below.

Policy S23 – Supporting and Safeguarding Strategic Infrastructure

We support and thank the Council for the inclusion of a new criterion (reference i) (ref MM72) which has been added to this policy to support proposals to secure future drinking water supplies for West Cumbria.

Similarly, United Utilities welcomes the new text in the appendices (ref MM105 and MM106) regarding water supply for West Cumbria and investment in wastewater infrastructure.

Policy S29 – Flood Risk and Surface Water Drainage

We suggest the following minor amendments shown as strikethrough and underline to new paragraph 289 (ref MM78).

'289. A hierarchy of drainage options for disposing of surface water must be considered and discounted in the following order:

- *Continue and/or mimic the site's current natural discharge process;*
- *Alleviate flows into green engineering solutions such as ponds, swales, or other open water features for gradual release to a watercourse and/or porous subsoils;*
- *Attenuate by storing in tanks or sealed systems for gradual release into a watercourse;*

- *Direct attenuated discharge to a surface water only sewer;*
- *~~Controlled~~ Attenuated discharge into the combined sewerage network, only if it can be demonstrated that there are no other viable options.'*

We suggest the following minor amendment shown as strikethrough and underline to new paragraph 290 (ref MM78).

'290. If new development is shown to unacceptably increase storm sewer overflows it ~~will~~ may be necessary to phase the development to allow time for the existing infrastructure to be improved. Culverting of waterways should be avoided.'

We trust these comments are self-explanatory and we would be grateful if you can confirm receipt. If you have any queries, please do not hesitate to contact Jenny Hope on 01925 731 319.

Yours faithfully

Andrew Leysens
United Utilities
Developer Services and Planning