

By email only: neighbourhoodplanning@cheshirewestandchester.gov.uk

Your ref:

Our ref:

Date: 30-JUL-26

Dear Sir / Madam

Tattenhall & District Modified Neighbourhood Plan 2025-2045: Submission Version (May 2026) - Regulation 16 Consultation

Thank you for consulting United Utilities Water Limited (U UW) on the Submission Version of the Tattenhall & District Modified Neighbourhood Plan.

U UW welcomes the opportunity to comment on the Neighbourhood Plan and is pleased to note that a number of points submitted by U UW at the previous consultation stage have been incorporated into the Plan. In particular, we welcome:

- the inclusion of water efficiency measures within Policy 7;
- recognition of the need for engagement with relevant infrastructure providers;
- inclusion of references to water catchment land within Policies 7 and 8; and
- acknowledgement of the need to consider water infrastructure constraints as development comes forward.

As the statutory undertaker for water supply in this area, our comments are limited to matters relating to water resources and the protection of water infrastructure assets. Therefore, you should ensure that you have also consulted the relevant wastewater undertaker.

Policy 7: Site Allocations

Water Efficiency

U UW welcomes the inclusion of water efficiency requirements within Policy 7. Water efficiency is an important measure in helping to secure long-term water supplies, reducing pressure on water resources and supporting climate resilience. However, we object to the inclusion of the words '*where feasible and viable*' within Policy 7(A)(xv) and Policy 7(B)(viii) in relation to achieving the optional Building Regulations water efficiency standard.

The current wording states:

‘Incorporate water efficiency measures, including, where feasible and viable, achieving the optional Building Regulations standard for water efficiency (or any successor standard) ...’

The available evidence demonstrates that achievement of the optional Building Regulations Requirement G2 water efficiency standard of 110 litres per person per day is not dependent upon viability considerations. The Future Homes Hub report [Water Ready: A Report to Inform HM Government's Roadmap for Water Efficient New Homes](#) identifies that the optional standard can be achieved through the specification of efficient fittings and fixtures. Table 3 of the report demonstrates that there is no additional cost associated with achieving the 110 litres per person per day standard when compared with current practice. As such, the evidence does not support a viability qualification being applied to this requirement.

UUW therefore recommends the following amendments to Policy 7(A)(xv) and Policy 7(B)(viii):

‘Incorporate water efficiency measures, including achieving the optional Building Regulations standard for water efficiency (or any successor standard), and for major non-residential development, measures consistent with BREEAM 'Excellent'.’

This amendment would provide a clear and effective policy requirement consistent with the evidence base supporting improved water efficiency in new development.

Tattenhall & District Design Code (2023)

Protection of Public Water Mains

UUW welcomes the Design Code's emphasis on sustainable development and the need to consider infrastructure at an early stage in the design process. However, the Design Code does not currently refer to the importance of identifying and protecting public water infrastructure when designing development proposals.

UUW will not permit buildings to be erected over, or in close proximity to, public water mains. It is therefore important that water infrastructure constraints are identified and considered at the earliest stages of the design process. This is particularly relevant not only for major development proposals but also for smaller developments, redevelopment schemes and householder extensions.

We recommend that additional wording is included within the Design Code, for example within Code 1A (Sustainability & Energy), as follows:

‘Prior to the design of new development, including extensions and redevelopment proposals, applicants should identify the location of public water mains and other utility infrastructure. Development should be designed to avoid building over, or in close proximity to, public water mains. Applicants should consult the relevant statutory undertaker and take account of infrastructure constraints at an early stage in the design process.’

This addition would help ensure that development proposals are designed around existing infrastructure constraints and reduce the risk of delays, redesign or impacts on essential water infrastructure.

Summary

Uuw welcomes the progress made since the previous consultation stage and supports the inclusion of water efficiency and water catchment land provisions within the Submission Version of the Plan.

Uuw requests the following amendments:

1. removal of the words '*where feasible and viable*' from the water efficiency requirements contained within Policy 7(A)(xv) and Policy 7(B)(viii); and
2. inclusion of additional Design Code wording requiring applicants to identify public water mains and avoid development over or in close proximity to water infrastructure assets.

If you have any queries regarding this representation, please do not hesitate to contact me at planning.liaison@uuplc.co.uk.

Yours faithfully

Andrew Leyssens MRTPI
Asset Management
United Utilities Water Limited