



**United Utilities Water Limited
Developer Services & Metering**
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Planning.liaison@uuplc.co.uk

Planning Inspectorate
Temple Quay House
2 The Square
Temple Quay
Bristol
BS1 6PN

Your ref: APP/M0655/W/
17/3178530
Our ref: DC/20/1603
Date: 17-JUN-20

Dear Sir/Madam,

Location: Land at Peel Hall Warrington WA2 9LH

Proposal: Major Development: Outline planning application for a new mixed use neighbourhood comprising residential institution (residential care home - Use Class C2); up to 1200 dwelling houses and apartments (Use Class C3); local centre including food store up to 2000 square metres (Use Class A1); financial & professional services; restaurants and cafes; drinking establishments; hot food takeaways (Use Classes A2-A5 inclusive); units within Use Class D1 (non-residential institution) of up to 600 sq m total with no single unit of more than 200 sq m; and family restaurant/ pub of up to 800 sq m (Use Classes A3/A4); primary school; open space including sports pitches with ancillary facilities; means of access (including the demolition of 344; 346; 348; 458 and 460 Poplars Avenue) and supporting infrastructure. (All detailed matters other than access reserved for subsequent approval.) (Application is accompanied by an Environmental Impact Assessment)

With regard to the above development proposal, United Utilities Water Limited ('United Utilities') welcomes the opportunity to provide comments upon the Environmental Statement Addendum, ES Documents and Figures and ES Non-Technical Summary. United Utilities would like to draw your attention to comments previously submitted in respect of the outline planning application (ref: 2016/28492) dated 14 December 2016 and a subsequent pre-application request dated 19 February 2019 and specifically our suggested draft conditions which we enclose again for ease of reference. These conditions are reflective of recommended conditions 16, 17, 18 and 19 set out within Appendix C of the Planning Inspectorate's report to the Secretary of State dated 1 October 2018. In addition to our suggested conditions we also support draft condition 20 regarding ground water protection and draft condition 31 regarding a Construction Environmental Management Plan, including the protection of existing utility assets and infrastructure.

The ES Addendum, and specifically Part 1, Chapter 7 'Hydrology, Drainage and Flood Risk Assessment' remains unchanged from the previous version of the ES to which we provided comments upon as part of planning application ref: 2016/28492. United Utilities wishes to re-iterate comments previously made to these consultations which are set out below:

United Utilities advises the following key points should be adhered to:

- Foul and surface water drain on separate systems.

- A holistic strategy for foul and surface water for the entire site. This should identify how the phases will interact within each other and reflect the surface water hierarchy which is outlined in the National Planning Practice Guidance. The approach to surface water should also be in accordance with the requirements of the non-statutory technical standards for sustainable drainage produced by Defra.
- Given the nature of the site we would expect there to be no reliance on the public sewer for the drainage of surface water.
- The strategy for wastewater infrastructure should seek to avoid the need for pumped solutions.
- The strategy should outline how different phases of the development will interact and ensure that infrastructure in the earlier phases, and that interconnects between phases, is appropriately sized.
- The site will require multiple connection points. A future strategy should identify possible connection points to the public sewerage network and clean water network.
- Given the size of the site, upgrades to infrastructure may be required. Until more detail is known about the development, it is difficult to comment on this further.
- For larger premises or developments of more than one property, including multiple connections, where additional infrastructure is required, a water network behaviour/demand modelling exercise would be required to determine the network reinforcements required to support the proposed development.
- If the appellant intends to obtain a water supply from United Utilities for the proposed development, we strongly recommend they engage with us at the earliest opportunity. If reinforcement of the water network is required to meet the demand, this could be a significant project and the design and construction period should be accounted for.
- If infrastructure upgrades are necessary, it may be necessary to co-ordinate the delivery of development with upgrades to infrastructure.
- The appellant should give consideration to the approach to management and maintenance of any on-site sustainable drainage system.
- United Utilities is not responsible for advising on rates of discharge to the local watercourse system and therefore we recommend the appellant engages with the Lead Local Flood Authority regarding these proposals.
- The proposed development site is situated within Groundwater Source Protection Zone (SPZ) 3, close to United Utilities water abstraction boreholes and within a Drinking Water Safeguard Zone for Groundwater. Drinking Water Safeguard Zones, designated by the Environment Agency under the Water Framework Directive, are used for areas around

abstractions where water quality is poor and are where additional measures are needed to improve water quality. Action is targeted at these zones to address water contamination. Land drainage and new development has the potential to impact on the quality of groundwater supplies, and given the scale of this development the potential effects of poorly designed SuDS need to be managed. We feel it is particularly important that the proposed SuDS are designed in accordance with the Ciria SuDS manual. In addition, the requirements from the Environment Agency's "Approach to Groundwater Protection" should also be applied to ensure that the development does not impact on groundwater quality in the area. Details of the approach of the EA is available at <https://www.gov.uk/government/collections/groundwater-protection>. We believe any future development/construction activity should be supported by a risk assessment and construction management plan.

- Further to the assessment of assets and infrastructure crossing the proposed site we strongly recommend a construction management plan is provided with any future planning submission to afford appropriate protection for United Utilities assets both during and post construction.
- Any proposed layout should also reflect United Utilities' Right of Way to Elm Road wastewater pumping station.
- The appellant should consult Sewers for Adoption 8th Edition and United Utilities Pumping Station Addendum document (available on United Utilities website) when considering potential layout in relation to pumping stations; in line with sewers for adoption 8th Edition, the minimum distance between the edge of the wet well and the wall of a habitable dwelling is 15m.
- Should the Planning Inspectorate be minded to allow this appeal or the Local Planning Authority approve a future planning application at this location; and the appellant intends to offer wastewater assets forward for adoption by United Utilities, the proposed detailed design will be subject to a technical appraisal. Therefore the proposal should meet the requirements of Sewers for Adoption and United Utilities' Asset Standards. The detailed layout should be prepared with consideration of what is necessary to secure a development to an adoptable standard.

In addition to the above, United Utilities would like to understand potential build out rates and the phasing of the development to best inform the drainage strategy.

Furthermore it is important to reiterate some other matters which need to be taken into consideration by the appellant

United Utilities Property, Assets and Infrastructure

Water main

A water main crosses the site. As we need unrestricted access for operating and maintaining it, we will not permit development over or in close proximity to the main. We require an access strip as

detailed in our 'Standard Conditions for Works Adjacent to Pipelines', a copy of which was provided with our previous consultation responses.

The appellant must comply with our 'Standard Conditions' document. This should be taken into account in the final site layout, or a diversion may be necessary. Unless there is specific provision within the title of the property or an associated easement, any necessary disconnection or diversion required as a result of any development will be at the appellant's expense. If considering a water mains diversion, the appellant should contact United Utilities at their earliest opportunity as they may find that the cost of mains diversion is prohibitive in the context of their development scheme.

The Water Industry Act 1991 affords United Utilities specific rights in relation to the maintenance, repair, access and protection of our water infrastructure;

- Sections 158 & 159, outlines the right to inspect, maintain, adjust, repair or alter our mains. This includes carrying out any works incidental to any of those purposes. Service pipes are not our property and we have no record of them.
- Under Section 174 of the Act it is an offence to intentionally or negligently interfere with any resource main or water main that causes damage to or has an effect on its use or operation.

It is in accordance with this statutory provision that we provide standard conditions to assist developers when working in close proximity to our water mains.

Both during and post construction, there should be no additional load bearing capacity on the main without prior agreement from United Utilities. This would include earth movement and the transport and position of construction equipment and vehicles.

Public sewer

Public sewers, including a rising main cross this site and we will not permit building over them. We will require an access strip width in accordance with the minimum distances specified in "Sewers for Adoption", for maintenance or replacement. This should be incorporated into any future site layout. Therefore a modification of the site layout, or a diversion of the affected public sewer may be necessary. All costs associated with sewer diversions must be borne by the appellant.

To establish if a sewer diversion is feasible, the appellant must discuss this at an early stage with our Developer Engineer at wastewaterdeveloperservices@uuplc.co.uk as a lengthy lead in period may be required if a sewer diversion proves to be acceptable.

Deep rooted shrubs and trees should not be planted in the vicinity of the public sewer and overflow systems.

Where United Utilities' assets exist, the level of cover to the water mains and public sewers must not be compromised either during or after construction.

For advice regarding protection of United Utilities assets, the appellant should contact the teams as follows:

Water assets – DeveloperServicesWater@uuplc.co.uk

Wastewater assets – WastewaterDeveloperServices@uuplc.co.uk

Pumping Station

As set out above, a Pumping Station and right of way is also located within the site boundary. The appellant should note that we will need access to these assets including a vehicular access to the pumping station. The existence of the pumping station and access to it will need to be considered in the site layout. We recommend that this access is discussed with our Property Services team if this appeal is allowed so appropriate access can be agreed in the site layout.

It is the appellant's responsibility to investigate the possibility of any United Utilities' assets potentially impacted by their proposals and to demonstrate the exact relationship between any United Utilities' assets and the proposed development.

A number of providers offer a paid for mapping service including United Utilities. To find out how to purchase a sewer and water plan from United Utilities, please visit the Property Searches website; <https://www.unitedutilities.com/property-searches/>

You can also view the plans for free. To make an appointment to view our sewer records at your local authority please contact them direct, alternatively if you wish to view the water and the sewer records at our Lingley Mere offices based in Warrington please ring [0370 751 0101](tel:03707510101) to book an appointment.

Due to the public sewer transfer in 2011, not all sewers are currently shown on the statutory sewer records and we do not always show private pipes on our plans. If a sewer is discovered during construction; please contact a Building Control Body to discuss the matter further.

Should this planning appeal be allowed the appellant should contact United Utilities regarding a potential water supply or connection to public sewers. Additional information is available on our website <http://www.unitedutilities.com/builders-developers.aspx>

Drainage

In accordance with the National Planning Policy Framework (NPPF) and the National Planning Practice Guidance (NPPG), the site should be drained on a separate system with foul water draining to the public sewer and surface water draining in the most sustainable way. Our suggested drainage conditions are as per the suggested conditions submitted in relation to planning application ref: 2016/28492. For ease of reference we enclose a copy of the draft conditions submitted as part of our consultation response in relation to planning application reference: ref: 2016/28492.

The appellant can discuss this with Developer Engineer, **Matthew Dodd**, by email at wastewaterdeveloperservices@uuplc.co.uk.

Please note, United Utilities is not responsible for advising on rates of discharge to the local watercourse system. This is a matter for discussion with the Lead Local Flood Authority and / or the Environment Agency (if the watercourse is classified as main river).

If the appellant intends to offer wastewater assets forward for adoption by United Utilities, the proposed detailed design will be subject to a technical appraisal by an Adoptions Engineer as we need to be sure that the proposal meets the requirements of Sewers for Adoption and United Utilities' Asset Standards. The detailed layout should be prepared with consideration of what is necessary to secure a development to an adoptable standard. This is important as drainage design can be a key determining factor of site levels and layout. The proposed design should give consideration to long term operability and give United Utilities a cost effective proposal for the life of the assets. Therefore, should this appeal be allowed and the appellant wishes to progress a Section 104 agreement, we strongly recommend that no construction commences until the detailed drainage design, submitted as part of the Section 104 agreement, has been assessed and accepted in writing by United Utilities. Any works carried out prior to the technical assessment being approved is done entirely at the developers own risk and could be subject to change.

Management and Maintenance of Sustainable Drainage Systems

Without effective management and maintenance, sustainable drainage systems can fail or become ineffective. As a provider of wastewater services, we believe we have a duty to advise the Local Planning Authority/Planning Inspectorate of this potential risk to ensure the longevity of the surface water drainage system and the service it provides to people. We also wish to minimise the risk of a sustainable drainage system having a detrimental impact on the public sewer network should the two systems interact.

We support draft condition 17 regarding a management and maintenance regime for any sustainable drainage system, albeit our suggested draft condition 4, submitted in response to the outline planning application and enclosed for ease of reference, provides further details required in the preparation of a management and maintenance plan.

Please note United Utilities cannot provide comment on the management and maintenance of an asset that is owned by a third party management and maintenance company. We would not be involved in the discharge of the management and maintenance condition in these circumstances.

Water Supply

If the appellant intends to obtain a water supply from United Utilities for the proposed development, we strongly recommend they engage with us at the earliest opportunity. If reinforcement of the water network is required to meet the demand, this could be a significant project and the design and construction period should be accounted for.

To discuss a potential water supply or any of the water comments detailed above, the appellant can contact the team at DeveloperServicesWater@uuplc.co.uk.

Please note, all internal pipework must comply with current Water Supply (water fittings) Regulations 1999.

Yours faithfully

Jill Walker
United Utilities
Developer Services and Metering

Enc Draft Conditions