

Lancashire County Council
Planning Service PO Box 9
Guild House, Cross Street
Preston
PR1 8 RD

Your ref: LCC/2021/0002
Our ref: DC/21/299
Date: 26-MAR-21

Dear Sir/Madam,

Location: Broadgate, Riverside and Riverside Road, Preston.

Proposal: New and Replacement Flood Defences Along the North and South Banks Of The River Ribble.

With reference to the above planning application, United Utilities wishes to draw attention to the following as a means to facilitate sustainable development within the region.

REQUEST FOR FURTHER INFORMATION

United Utilities holds no objection in principle to the proposals, and is supportive of measures to reduce the impact of flooding across the region, however these proposals include significant engineering works either on or immediately adjacent to our public sewer network and water mains. Whilst we have been in direct liaison with the applicant (the Environment Agency) to reach a suitable solution to ensure United Utilities' assets are protected, there are a number of areas of the proposed development site where we still require further information to ensure that the public sewer network and public water supply are protected. On this basis, **we request that further information is submitted for our consideration prior to the determination of this application.** Given the presence of water and wastewater infrastructure along the route of the proposed scheme, amendments to the proposed route of the flood defence scheme or the diversion of infrastructure may be required, we request this is given further consideration prior to determination.

Whilst it is noted that the planning application makes reference to some mitigation measures, such as confirmation of the line and level of services to be carried out prior to construction and services to be protected, this does not take account of what mitigation measures will be proposed, where the route of the flood defences will need be amended to take account of the presence of water and wastewater infrastructure or where diversions are proposed. In addition, there is no assessment of the impact upon our outfalls or any proposed mitigation measures.

Given the significance of the proposed scheme and that this is an application for full planning permission we request the following information is submitted for our consideration prior to determination:

- Survey of existing infrastructure including water and wastewater infrastructure, manholes and outfalls – this will determine what water and wastewater infrastructure will be impacted and whether this will require diversion of the affected infrastructure or realignment of the proposed flood defences.
- Modelling information to determine the hydraulic effect of the new flood defences on the existing sewer network (including any assessment of tidal conditions) which might lead to surface waters being trapped behind the flood defences, or of river locking prevent the outfalls from discharging (causing sewer surcharging and flooding of land and properties).
- A clear schedule of proposed mitigation/protection measures to ensure the existing water and wastewater infrastructure is protected during construction and for the lifetime of the development.

In the event that the above information is not submitted for our consideration prior to determination, and whilst is not our recommended approach, we request that the following conditions are attached to any subsequent approval to ensure that water and wastewater infrastructure is protected both during construction and following completion of the development:

Condition 1 - Asset Protection

No development shall commence (including any earthworks) until details of the means of ensuring the water and wastewater infrastructure, including associated easements and access areas, laid within the site boundary are protected from damage as a result of the development have been submitted to and approved by the Local Planning Authority in writing. The details shall include a survey of the exact location of the water and wastewater infrastructure and outline the potential impacts on the infrastructure from construction activities (including the construction compound and temporary parking areas) and the impacts post completion of the development and identify mitigation measures, including a timetable for implementation, to protect and prevent any detrimental impact to the infrastructure and its operation both during construction and post completion of the development. The details shall include a pre and post construction condition survey. Any mitigation measures shall be implemented in full prior to commencement of development in accordance with the approved details and timetable and shall be retained thereafter for the lifetime of the development.

In the event that a diversion/diversions of the infrastructure is required, the developer shall submit evidence to the Local Planning Authority that a diversion has been agreed with the relevant statutory undertaker and that the approved works have been undertaken prior to the commencement of development.

Reason: In the interest of public health and to ensure protection of the water and wastewater infrastructure laid within the site.

Condition 2 - Protection of Outfalls

No development shall commence (including any earthworks) until an assessment of impact of any raised river levels on existing outfalls has been submitted to and approved by the Local Planning Authority in writing. The details shall include a survey of the affected outfalls and outline the potential impacts both during construction and post completion of the development and identify mitigation measures, including a timetable for implementation, to protect and prevent any detrimental impact to the outfalls and their operation both during construction and post completion of the development. Any mitigation measures shall be implemented in full prior to commencement of development in accordance with the approved details and timetable and shall be retained thereafter for the lifetime of the development.

Condition 3 - Drainage

Prior to the commencement of development (excluding demolition) details of a sustainable surface water drainage scheme shall be submitted to and approved in writing by the Local Planning Authority. The drainage scheme must include:

- (i) An investigation of the hierarchy of drainage options in the National Planning Practice Guidance (or any subsequent amendment thereof). This investigation shall include evidence of an assessment of ground conditions, the potential for infiltration of surface water in accordance with BRE365, a survey of existing drainage arrangements and the potential to discharge surface water to the highway drainage system;***
- (ii) A restricted rate of discharge of surface water agreed with the local planning authority (if it is agreed that infiltration is discounted by the investigations);***
- (iii) Levels of the proposed drainage systems including proposed ground and finished floor levels in AOD;***
- (iv) Incorporate mitigation measures to manage the risk of surcharging of public sewers and outfalls;***
- (v) A construction Surface Water Management Plan; and***
- (vi) Foul and surface water shall drain on separate systems.***

The approved scheme shall also be in accordance with the Non-Statutory Technical Standards for Sustainable Drainage Systems (March 2015) or any subsequent replacement national standards and no surface water shall discharge to the public sewer either directly or indirectly. Prior to completion of the proposed development, the drainage schemes shall be carried out and completed in accordance with the approved details and retained thereafter for the lifetime of the development.

Reason: To promote sustainable development, secure proper drainage and to manage the risk of flooding and pollution.

If the applicant 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 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 application be approved and the applicant 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.

Details of both our S106 sewer connections and S104 sewer adoptions processes (including application forms) can be found on our website <http://www.unitedutilities.com/builders-developers.aspx>

Please note we are not responsible for advising on rates of discharge to the local watercourse system. This is a matter for you to discuss with the Lead Local Flood Authority and / or the Environment Agency if the watercourse is classified as main river.

Water supply

If the applicant 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 which should be accounted for in the project timeline for design and construction.

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

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

United Utilities' property, assets and infrastructure

Several water mains cross the multi-sites forming the proposed works. As we need unrestricted access for operating and maintaining them, we will not permit development over or in close proximity to the mains. We require an access strip as detailed in our 'Standard Conditions for Works Adjacent to Pipelines', a copy of which is enclosed.

The applicant 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 applicant's expense. If considering a water mains diversion, the applicant 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 or excess vibration to the mains without prior agreement from United Utilities. This would include earth movement and the transport and position of construction equipment, materials and vehicles.

Multiple public sewers cross this site and we may not permit building over them. We will require an access strip width typically of six metres (three metres either side of the centre line of the sewer) which is in accordance with the minimum distances specified in the current issue of Part H of the Building Regulations, for maintenance or replacement. Note that the exact easement width depends on the diameter of the sewer pipe. 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 applicant.

To establish if a sewer diversion is feasible, the applicant 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 applicant should contact the teams as follows:

Water assets – DeveloperServicesWater@uuplc.co.uk

Wastewater assets – WastewaterDeveloperServices@uuplc.co.uk

It is the applicant'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.

Alternatively we can assist the applicant in drawing up a schedule of investigation works to identify the line, level, depth, pipe material and condition of our impacted assets prior to satisfactory designs and mitigation measure being agreed.

For any further information regarding Developer Services and Planning, please visit our website at <http://www.unitedutilities.com/builders-developers.aspx>

Yours faithfully

Shireen Lawrenson
Planning Analyst
Planning, Landscape and Ecology