

Lancashire County Council
By email

Your ref: LCC/2022/0003
Our ref: DC/22/452
Date: 18-FEB-22

Dear Planning Team

Location: Culzean, Tower House, Stopgate Lane, Simonswood Industrial Park, Simonswood, W2E LTD.

Proposal: Demolition Of Existing Building And Erection Of Purpose Built Building (And Ancillary Structures) To House High Temperature Treatment Facility For The Management Of Medical Waste.

United Utilities wish to make the following comments regarding the proposal detailed above.

The site overlies the sandstone rock at depth, with a potentially thin clay cover. The site boundary lies in both a Groundwater Source Protection Zone (SPZ) 2 & 3. This forms an aquifer, abstracted at depth by United Utilities for public drinking water supply at the nearby Abrams Farm borehole.

Groundwater – Protecting Public Water Supply

A Hydrogeological Risk Assessment, based on detailed Ground Investigation and groundwater monitoring is required, to address the risks of contamination reaching the aquifer and pollution of the public drinking water supply. We assume piling or foundations may penetrate into the Sandstone aquifer.

Should the Council deem it appropriate to grant planning permission, we recommend a condition, requesting a Hydrogeological Risk Assessment is attached to the Decision Notice, to include:

- An assessment of the risks to groundwater from the proposed development site, both during construction and operational phases;
- A Geological Conceptual Site Model for the site, showing the pathway to the aquifer Groundwater Protection Zones, across the site; and
- A Desk Study and Ground Investigation reports for the site, supporting the CSM including groundwater depths and soil & groundwater chemical analysis.

Condition - Hydrogeological Risk Assessment

Prior to the commencement of development, a hydrogeological risk assessment for the scheme must be submitted to, and approved in writing by, the local planning authority. The assessment must demonstrate that the risks posed to groundwater from the development can be satisfactorily managed for the lifetime of the development through appropriate mitigation measures, which should be implemented as part of the final drainage strategy.

Reason: To prevent pollution of groundwater and ensure there is no contamination to public water supply.

CEMP

The applicant should follow best practice on their use and storage of medical and other wastes, fuels, oils and chemicals to remove the risk of causing pollution during both construction and operation in line with EA (Environment Agency) guidance.

We request the following condition for the provision of a Construction Environment Management Plan:

Condition - Construction Environment Management Plan (CEMP)

No development shall take place, including any works of demolition, until a Construction Environment Management Plan, including Pollution Risk Assessments and Method Statements, has been submitted to, and approved in writing by the local planning authority. The Statement shall provide for:

- i) The storage of waste prior to thermal treatment;***
- ii) The control of release of particulate contamination to air;***
- iii) Risk of aerial deposition onto the surrounding catchment;***
- iv) Removal and storage of ash, following thermal treatment;***
- v) The parking of vehicles of site operatives and visitors;***
- vi) Loading and unloading of plant and materials;***
- vii) Storage of plant and materials used in constructing the development;***
- ix) Wheel washing facilities;***
- x) A scheme for recycling/disposing of waste, resulting from demolition and construction works;***
- xi) Protection of surface and groundwater resources;***
- xii) Best practise on the use and storage of fuels, oils and chemicals, to remove the risk of causing pollution during construction;***

The approved Construction Method Statement shall be adhered to throughout the construction period for the development.

Site Operations

United Utilities would also request to review and comment on the operating procedures for the thermal waste treatment and medical waste storage, as part of the EA's Environmental Permit decision for the site.

Request for Additional Information Prior to Determination

A review of the geological setting information available for the local area indicates there may be a direct pathway for contaminants to pollute the aquifer, used for drinking water supply. We ask that the following information is submitted for our review and comment prior to the determination of this application:

- ***Location and design of the incinerator foundations and waste storage areas on-site.***
- ***How is the impermeability of the hardstanding on-site to be maintained?***
- ***Desk Study and Ground Investigation reports for the site, addressing ground contamination risks.***
- ***Design of the reclaimed rainwater tanks, to be stored on-site.***
- ***What protection is in place, to prevent both catastrophic loss and/ or leakage of the potentially contaminated rainwater to the underlying aquifer?***

On receipt of this information we will be able to provide further comment.

Water connections and Brownfield Land

The developer may be required to undertake a Water Supply Pipe Risk Assessment, to select the correct water pipes for installation & to make connection to the proposed development.

If ground or groundwater contamination is suspected, the applicant must undertake a Desk Study, possibly followed by Ground Investigation, as and when land proposals have progressed to a scheme design i.e. development. This is to support the WSP RA submitted to United Utilities, along with an application for water connection. This will aid in design of future pipework and materials, to eliminate the risk of contamination entering the local water supply.

DRAINAGE

We request the following drainage condition is attached to any subsequent approval:

Prior to the commencement of development, details of a sustainable surface water drainage scheme and a foul water drainage scheme shall be submitted to and approved in writing by the Local Planning Authority. The drainage schemes 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 and the potential for infiltration of surface water in accordance with BRE365;***
- (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 sewer surcharge where applicable; and***
- (v) Foul and surface water shall drain on separate systems.***

The approved schemes shall also be in accordance with the Non-Statutory Technical Standards for Sustainable Drainage Systems (March 2015) or any subsequent replacement national standards.

Prior to occupation of the proposed development, the drainage schemes shall be 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.

The applicant can discuss any of the above with Developer Engineer, **Alistair Graham**, 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 applicant intends to offer wastewater assets forward for adoption by United Utilities, their proposed detailed design will be subject to a technical appraisal by our Developer Services team and must meet the requirements outlined in 'Sewers for Adoption and United Utilities' Asset Standards'. This is important as drainage design can be a key determining factor of site levels and layout.

Acceptance of a drainage strategy does not infer that a detailed drainage design will meet the requirements for a successful adoption application. We strongly recommend that no construction commences until the detailed drainage design, has been assessed and accepted in writing by United Utilities. Any work carried out prior to the technical assessment being approved is done entirely at the developer's 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 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 therefore recommend the Local Planning Authority include a condition in their Decision Notice regarding a management and maintenance regime for any sustainable drainage system that is included as part of the proposed development.

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 AND WASTEWATER SERVICES

If the applicant intends to receive water and/or wastewater services from United Utilities, they should visit our website or contact the Developer Services team for advice. This includes seeking confirmation of the required metering arrangements for the proposed development.

If the proposed development site benefits from existing water and wastewater connections, the applicant should not assume that the arrangements will be suitable for the new proposal.

In some circumstances we may require a compulsory meter is fitted. For detailed guidance on whether the development will require a compulsory meter please visit <https://www.unitedutilities.com/my-account/your-bill/our-household-charges-20212022/> and go to section 7.7 for compulsory metering.

If reinforcement of the water network is required to meet potential demand, this could be a significant project and the design and construction period should be accounted for.

To avoid any unnecessary costs and delays being incurred by the applicant or any subsequent developer, we strongly recommend the applicant seeks advice regarding water and wastewater services, and metering arrangements, at the earliest opportunity. Please see 'Contacts' section below.

UNITED UTILITIES PROPERTY, ASSETS AND INFRASTRUCTURE

United Utilities will not allow building over or in close proximity to a water main and may not allow building over or in close proximity to a public sewer.

It is the applicant's responsibility to demonstrate the exact relationship between any United Utilities' assets and the proposed development. Developer's should investigate the existence and the precise location of water and wastewater pipelines as soon as possible as this could significantly impact the preferred site layout and/or diversion of the asset(s) may be required. Where United Utilities' assets cross the proposed red line boundary, developers must contact our Developer Services team prior to commencing any works on site, including trial holes, groundworks or demolition.

Unless there is specific provision within the title of the property or an associated easement, any necessary disconnection or diversion of assets to accommodate development, will be at the applicant/developer's expense. In some circumstances, usually related to the size and nature of the assets impacted by proposals, developers may discover the cost of diversion is prohibitive in the context of their development scheme.

Where United Utilities' assets exist, the level of cover to United Utilities pipelines and apparatus must not be compromised either during or after construction and there should be no additional load bearing capacity on pipelines without prior agreement from United Utilities. This would include earth movement and the transport and position of construction equipment and vehicles.

Consideration should also be applied to United Utilities assets which may be located outside the applicant's red line boundary. Any construction activities in the vicinity of our assets must

comply with our 'Standard Conditions for Works Adjacent to Pipelines' or national building standards.

The applicant or developer should contact our Developer Services team for advice if their proposal is in the vicinity of water or wastewater pipelines and apparatus. It is their responsibility to ensure that United Utilities' required access is provided within their layout and that our infrastructure is appropriately protected. The developer would be liable for the cost of any damage to United Utilities' assets resulting from their activity. See 'Contacts' section below.

CONTACTS

Website

For detailed guidance on water and wastewater services, including application forms and the opportunity to talk to the Developer Services team using the '**Live Chat**' function, please visit:

<http://www.unitedutilities.com/builders-developers.aspx>

Email

For advice on water and wastewater services or to discuss proposals near to pipelines, email the Developer Services team as follows:

Water mains and water supply, including metering - DeveloperServicesWater@uuplc.co.uk

Public sewers and drainage - WastewaterDeveloperServices@uuplc.co.uk

Telephone - 0345 072 6067

Property Searches (for asset maps):

A number of providers offer a paid for mapping service including United Utilities. For more information, or to purchase a sewer and water plan from United Utilities, please visit <https://www.unitedutilities.com/property-searches/>

Water and sewer records can be viewed for free at our Warrington Head Office by calling 0370 751 0101. Appointments must be made in advance. Public sewer records can be viewed at local authority offices. Arrangements should be made directly with the local authority.

The position of the underground apparatus shown on asset maps is approximate only and is given in accordance with the best information currently available. United Utilities Water will not accept liability for any loss or damage caused by the actual position being different from those shown on the map.

We request that a copy of this letter is made available to the applicant.

Yours faithfully

The Planning, Landscape and Ecology Team