

Ribble Valley Borough Council  
Council Offices  
Church Walk  
Clitheroe  
BB7 2RA

**Your ref:** 3/2019/0999  
**Our ref:** DC/19/4792  
**Date:** 10-DEC-19

Dear Sir/Madam,

**Location: Land off Henthorn Road, Clitheroe, BB7 3BY**

**Proposal: Erection of up to 160 dwellings with public open space, landscaping and sustainable drainage**

With regards to the above development proposal, United Utilities Water Limited (*'United Utilities'*) wishes to provide the following comments.

**Proximity of Proposed Houses to Existing Wastewater Treatment Works – Request for Additional Information Prior to Determination**

United Utilities wishes to note that the application site is located to the north of Clitheroe Wastewater Treatment Works and is therefore concerned with the location of new sensitive receptors close to an operational wastewater treatment works.

United Utilities would like to work collaboratively with the developer to ensure the risk of unacceptable odour exposure in the proposed development area is minimised. As such, so that potential risk can be assessed we request the applicant submits an initial screening level odour impact assessment (OIA), using regulatory approved modelling software and that the modelling methodology, inputs and assessment criteria are agreed prior to the production/release of any report. We further request that the OIA is supported with the results of field sniff tests conducted in adherence to Institute of Air Quality Management guidelines. This information should be submitted for consideration prior to determination.

Dependant on the findings of these initial assessments we may request further investigation/analysis to be undertaken i.e. site specific odour emission survey and detailed dispersion modelling to be undertaken at the developer's own costs.

**Drainage**

Following our review of the submitted Flood Risk Assessment, we can confirm the drainage proposals are acceptable in principle to United Utilities and therefore should planning permission be granted we request the following condition is attached to any subsequent Decision Notice:

***Before or concurrent with the submission of the first of the reserved matters application(s) for the site, a surface water drainage scheme, based on sustainable drainage principles, shall be submitted to and approved in writing by the Local Planning Authority.***

***The drainage scheme shall be in accordance with the principles set out in the submitted Flood Risk Assessment (Ref No. SHF.1132.227.HY.R.001.A, Dated October 2019) prepared by Enzygo and no surface water will be permitted to drain directly or indirectly into the public sewer. The approved drainage scheme shall also be in accordance with the Non-Statutory Technical Standards for Sustainable Drainage Systems (March 2015) or any subsequent replacement national standards.***

***The development hereby permitted shall be completed only in accordance with the approved drainage scheme prior to occupation of the first dwelling 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, **Robert Brenton**, by email at [wastewaterdeveloperservices@uuplc.co.uk](mailto:wastewaterdeveloperservices@uuplc.co.uk).

We note the reference within the submitted flood risk assessment to the risk associated with groundwater flooding. We wish to highlight that land drainage or subsoil drainage water must not be connected into the public sewer system directly or by way of private drainage pipes. It is the developer's responsibility to provide adequate land drainage without recourse to the use of the public sewer system. This will need to be considered in the future detail of any drainage design given the risk that has been identified from groundwater flooding.

Please note, United Utilities are 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, 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 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 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.

We recommend the Local Planning Authority consults with the Lead Local Flood Authority regarding the exact wording of any condition. You may find the below a useful example.

***Prior to occupation of the development a sustainable drainage management and maintenance plan for the lifetime of the development shall be submitted to the local planning authority and agreed in writing. The sustainable drainage management and maintenance plan shall include as a minimum:***

- a. Arrangements for adoption by an appropriate public body or statutory undertaker, or, management and maintenance by a resident's management company; and***
- b. Arrangements for inspection and ongoing maintenance of all elements of the sustainable drainage system to secure the operation of the surface water drainage scheme throughout its lifetime.***

***The development shall subsequently be completed, maintained and managed in accordance with the approved plan.***

***Reason: To ensure that management arrangements are in place for the sustainable drainage system in order to manage the risk of flooding and pollution during the lifetime of the 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 Supply**

Our water mains will need extending to serve any development on this site and the applicant may be required to pay a contribution.

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 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 applicant can contact the team at [\*\*DeveloperServicesWater@uuplc.co.uk\*\*](mailto: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**

**Water mains cross the site.** 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 access strips 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.

It is the applicant's responsibility to demonstrate the exact relationship between any United Utilities' assets and the proposed development. We recommend the developer contacts United Utilities for advice on identifying the exact location of the water mains.

Our standard conditions document includes details of trees and shrubbery suitable for planting in the vicinity of a water main. The applicant should consult this document to ensure their landscaping proposals meet with the advice provided in the document. We also recommend the use of root barriers to afford additional protection to the water mains.

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 and 159 outline 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 these statutory provisions 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 mains without prior agreement from United Utilities. This would include earth movement and the transport and position of construction equipment and vehicles.

**A public sewer crosses this site and we may not permit building over it.** We will require an access strip width, which is in accordance with the minimum distances specified in the current issue of "*Sewers for Adoption*", for maintenance or replacement. Therefore a modification of the site layout, or a diversion of the affected public sewer at the applicant's expense, may be necessary. 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](mailto: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. Trees should not be planted directly over sewers or where excavation onto the sewer would require removal of the tree.

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](mailto:DeveloperServicesWater@uuplc.co.uk)

Wastewater assets – [WastewaterDeveloperServices@uuplc.co.uk](mailto: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.

Should this planning application be approved the applicant 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>

Yours faithfully

Andrew Leyssens  
United Utilities  
Developer Services and Metering

Encs.