

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

**Your ref:** 3/2021/0275  
**Our ref:** DC/21/1403  
**Date:** 10-NOV-21

Dear Sir/Madam

**Location:** Land behind The Dog Inn, Market Place, Longridge PR3 3RR  
**Proposal:** Proposed erection of 9 new dwellings and associated works

Thank you for the new information received by email on 11 October 2021. United Utilities Water Limited (*'United Utilities'*) wishes to provide the following updated comments with respect to the interaction with the public sewer. Whilst the newly submitted information is helpful, it has not addressed all of our previous queries. Our latest position is therefore set out below in accordance with the numbering used by the applicant in their latest response to our previous correspondence.

#### **Request for Additional Information Prior to Determination**

1. With respect to the finished floor and ground levels, whilst spot ground levels surrounding some of the proposed properties have been provided (as well as the levels of ridge lines), we would request that the applicant confirms the finished floor levels for all proposed units and finished ground levels for the site. In addition, the drainage strategy plan only provides a limited level of information for assessment of the proposed drainage system. There are no details for the surface water drainage arrangements and only partial information for the foul drainage system. We have requested this information previously and still require this detail in order to make a full assessment of the proposals. We request that the information includes the proposed private drainage runs and connection points for each unit to the proposed drainage systems in order to complete our assessment of the proposed development.

2. We note that the consulting engineers have now included details of exceedance flow routes on the revised design, however, there is no evidence to show that flows will be conveyed in the highway rather than continuing towards existing properties to the southeast. We request that the applicant provides details to demonstrate how any exceedance flows will be managed in

practice for example through high kerbs and any raising of proposed ground levels. This information should be included on the provided drainage plan, which should also include final finished ground levels as noted above. We request that the applicant clarifies the details for any retaining wall structure and boundary treatment around the curtilage of the proposed properties. This is particularly with reference to plots 1 and 7. We request that the external ground levels fall away from the curtilage of the proposed properties (following any regrade) to allow for safe overland / exceedance flow routes.

3. We note the applicant's comments. We wish to clarify that if the proposed S185 diversion of the public sewer is not deemed acceptable or results in a change in the proposed layout, the revised plans would have to be submitted back through the planning process for approval. Therefore if you are minded to approve this application, which we do not recommend at the current time, it is important that we highlight to the applicant that development should not commence until the details of any diversion of the affected public sewer have been agreed and formally approved by United Utilities in writing. At the current point in time, we remain concerned that the affected public sewer includes a significant reduction in cover levels on existing manholes and the introduction of new bends. Both these matters need additional careful consideration to ensure there is no increase in flood risk to the proposed properties as a result of the diversion.

4. We can see from the information provided that both manholes on the proposed private drainage run will be of relatively deep construction but the pipe linking the two will have minimal cover. This is a risk that the developer/ultimate owner will have to be informed of, but if it is a private system, it would not be subject to the same adoption criteria. It would still be subject to Building Regulations and subsequent sign off from an approved Building Control Officer.

Once the above matters have been addressed we will further assess the proposals and provide additional comment. It is important that we highlight that our continued request for additional information is borne out of a range of concerns which include the acceptability of the proposed diversion, the significant change in levels on the site and the potential introduction of proposed properties as new hydraulic lows. These matters could expose the proposed properties to a risk of sewer flooding. At the current time, we have not been able to adequately assess this risk due to the absence of submitted information as outlined above. It is for these reasons that we continue to request the submission of additional information prior to determination.

As noted previously we wish to draw to the applicant's attention the fact that the public sewer that passes through the site is a foul only sewer. In the event that infiltration is not feasible, there is no right to connect surface water to a foul only public sewer.

We wish to also note that the council should give careful consideration to the proposed soakaway and the potential impact on any adjoining land. At the current time, we are not aware of any intention to offer the surface water drainage systems for adoption therefore this system would be a private asset for which United Utilities would have no responsibility. In discharging any future planning condition, you should therefore consider the detailed design of the surface water drainage arrangements with your colleagues who act as the Lead Local Flood Authority or your building control colleagues.

Once the additional information is provided, we will be able to provide further comment and recommend final detailed conditions. **Given the absence of the above information, the concerns we have outlined and the nature of the application, which is submitted in full; we recommend that the application is not determined until additional information is first received and assessed.** If, however, you are minded to favourably determine this application in advance of receipt of this information, we would request that you attach the following condition.

### ***Foul and Surface Water Drainage Condition***

*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) Details of overland flows and how these will be managed including exceedance routes from the existing and proposed drainage systems;*
- (v) Mitigation measures to manage the risk of sewer surcharge;*
- (vi) Foul and surface water shall drain on separate systems;*
- (vii) Full details of the proposed sewer diversion and written evidence that this has been agreed with the statutory undertaker;*
- (viii) A management and maintenance plan. The 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 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 including during construction.**
- (ix) A timetable for implementation.*

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

*The drainage schemes shall be completed, maintained and managed 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 the above matters with our Developer Engineer, **Rob Brenton**, by email at [wastewaterdeveloperservices@uuplc.co.uk](mailto: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, the proposed detailed design will be subject to a technical appraisal by an Adoption 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 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 that the Local Planning Authority includes 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. This is reflected in our above-recommended condition. We recommend the Local Planning Authority consults with the Lead Local Flood Authority regarding the exact wording of any condition.

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 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.

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

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).

### **United Utilities' Property, Assets and Infrastructure**

As noted above, **a public sewer crosses this site and we may not permit building over it.** We will require an access strip width 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. 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](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.

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. Both during and post construction, there should be no additional load bearing capacity on our assets without prior agreement from United Utilities. This would include earth movement and the transport and position of construction equipment and vehicles. 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 at <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 at <http://www.unitedutilities.com/builders-developers.aspx>.

Yours faithfully

Tracy Churchman  
Planning Analyst  
Planning, Landscape and Ecology