

Bury Council
By email only

Your ref: 70129
Our ref: DC/23/3485
Date: 18-OCT-23

Dear Planning Team

Location: Prestwich Village Centre

Proposal: Environmental Impact Assessment (EIA) Scoping Opinion Request and the EIA Scoping Report for the proposed Prestwich Village Centre Regeneration

With reference to the above Scoping Opinion Request (Environmental Impact Assessment), United Utilities (UU) wishes to make the following comments at this early stage regarding the expectations for any future proposals and the scope of any future planning application.

The key areas for consideration by the applicant in the detailed design process and in the preparation of a planning application can be summarised as follows:

- **Asset protection** for existing water and wastewater infrastructure which is located within or close to the proposed redline boundary;
- **Flood Risk;** and
- The delivery of sustainable **foul and surface water drainage proposals.**

ASSET PROTECTION

We would like to draw the applicant's attention to the various water and wastewater assets that lie within and near to the application site. For any development proposal these would need to be given careful consideration.

Our assets may be impacted by the proposed regeneration works, and may need to be diverted and/or protection measures put into place. The location of the assets will be material to the development proposals so it is deemed to be in the applicants' interest to clarify the exact position of these assets prior to the submission of any formal planning application. It is important to note that we will not permit development over or in close proximity to our assets.

Please also note that according to our records, there are easements within the proposed development site which are in addition to our statutory rights for inspection, maintenance and

repair. The easements dated 15/06/1881 UU Ref: Z1092 and dated 12/11/2003 UU Ref: Z1623 have restrictive covenants that must be adhered to. It is the responsibility of the developer to obtain a copy of the documents, available from United Utilities Legal Services or Land Registry and to comply with the provisions stated within the relevant documents. Under no circumstances should anything be stored, planted or erected on the easement widths, nor should anything occur that may affect the integrity of the pipes or United Utilities legal right to 24 hour access.

We strongly advise the applicant engages with us at the earliest possible opportunity to identify the assets which may be impacted by these proposals. Our assets will need to be fully considered as part of the design process, with the potential impacts identified at an early stage and suitable mitigation and protection measures and/or diversions incorporated into the design, construction and ongoing operation of the application site. If the applicant hasn't already done so, they can take advantage of our free pre-development service by visiting our website <https://www.unitedutilities.com/builders-developers/your-development/planning/pre-development-guidance/>.

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'*, a copy of which can be found on our website, and national building and construction standards. It is the applicant's 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.

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 a diversion is prohibitive in the context of their development scheme.

Please note the location of our water and wastewater network on maps is only indicative. We recommend the applicant contacts United Utilities for advice on identifying the exact location of our assets. For advice regarding protection of United Utilities assets, the applicant should contact the teams as follows:

Water Assets: DeveloperServicesWater@uuplc.co.uk

Wastewater Assets: SewerAdoptions@uuplc.co.uk

FLOOD RISK

We wish to highlight that there are public sewers that pass through and near to this site which modelling data identifies as being at risk of sewer flooding. This risk of flooding from the public

sewers will need careful consideration in the detailed design, masterplanning and drainage details for the site. We request the applicant liaises with United Utilities to understand the nature of this flood risk and the impact upon the proposed development. The risk of sewer flooding needs to be assessed further as this could be material to the developable area of the site, the detail of the design, site levels and whether the sequential approach needs to be applied. New development should be located so that it is safe and will not increase flood risk elsewhere.

The applicant should consider site topography and any exceedance flow paths from existing and proposed drainage systems. Resultant layouts and levels should take account of such existing circumstances to ensure the most flood resilient solution is achieved. Careful consideration will need to be given to the incorporation of mitigation measures subject to the detail of the development proposal. This should include the approach to drainage including the management of surface water; the point of connection; whether the proposal will be gravity or pumped; the proposed finished floor and ground levels; and any appropriate measures to manage any risk of sewer surcharge.

Given the existence of sewer flood risk, the applicant should not assume that changes in levels or any works to the sewer, including a proposed diversion, will be acceptable as such proposals could increase and/or displace flood risk. In the event that a diversion of the public sewerage system is proposed this will need to be modelled to determine the impact of flood risk both on and off site. We recommend that this is undertaken to inform the preparation of the site layout noting that any diversion, alteration or change in levels may not be acceptable.

FOUL AND SURFACE WATER DRAINAGE

We would strongly recommend that a detailed site-wide foul and surface water drainage strategy is prepared to inform any future planning application at this site. It is critical that the masterplanning and detailed design of the site is intrinsically linked to the strategy for surface water management and to an assessment of any utility constraints and to an assessment of any flood risk / natural drainage patterns at the site.

Hierarchy for Managing Surface Water

All development proposals will be expected to fully investigate the hierarchy of drainage options for surface water. The minimum expectation is that no surface water will discharge to the public sewer. In accordance with national planning policy, the surface water hierarchy should be followed:

'Where possible, preference should be given to multi-functional sustainable drainage systems, and to solutions that allow surface water to be discharged according to the following hierarchy of drainage options:

- 1. Into the ground (infiltration);*
- 2. To a surface water body;*
- 3. To a surface water sewer, highway drain, or another drainage system;*
- 4. To a combined sewer.'*

We recommend the applicant considers the potential for infiltration of surface water and undertakes a review of any historic culverted watercourses that may exist in the area to ascertain if they represent an option for the management of surface water. It is critical that the hierarchy for managing surface water is investigated as soon as possible and prior to progressing the detail of any site design as the final outfall for managing surface water could be a critical determinant of site design.

We also wish to highlight that application of the hierarchy for managing surface water and a sustainable approach to surface water management is critical to reducing the impact on our wastewater assets (both our sewers and wastewater treatment works) which helps reduce the risk of flooding and the impact on watercourses and the environment. Consistent with the surface water hierarchy and the obligations of the Environment Act 2021, every effort should be made to reduce the discharge of surface water to the public sewer. Surface water should instead discharge to more sustainable alternatives wherever possible. This will ensure the impact of any proposals on public wastewater infrastructure, both in terms of the wastewater network and wastewater treatment works, is minimised. This reflects the fact that surface water flows are very large when compared with foul flows.

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).

Sustainable Drainage

We wish to highlight the importance of multi-functional sustainable drainage which is integrated with the landscaped environment. We request that any landscaping of the site is linked to the proposals for surface water management in accordance with the '*four pillars*' of sustainable drainage systems, i.e. water quantity, water quality, amenity, and biodiversity. National policy is clear that priority should be given to multi-functional Sustainable Drainage Systems (SuDS) over traditional underground, tanked and piped storage systems. Sustainable water management, especially in the form of multi-functional SuDS, helps us adapt and respond to the challenges posed by climate change and the impact of urbanising our environment. SuDS also have wider benefits and represent an opportunity to improve the quality of urban environments by changing '*grey*' to '*green and blue*'. They can help to create more attractive and usable spaces which help with social cohesion by connecting people, improving amenity and wellbeing, and offering opportunities for nature. In our urban environments there are often areas that can be better used to manage rainfall runoff through surface levels SuDS which can transform grey and impermeable spaces to greener, more attractive and resilient spaces appreciated by the community.

United Utilities requests the applicant considers how any proposals for the public realm created on the site can be linked to opportunities for surface water management. We request that any landscaping and public realm improvements evaluate opportunities for surface water management to include opportunities for source control and slow the flow of surface water through the incorporation of blue and green Infrastructure. It is essential that the evaluation of surface water management opportunities are undertaken at the outset of the design process.

Such an approach has added benefits associated with the quality of the public realm, the enhancement of biodiversity and urban cooling.

The design of the site should be intrinsically linked to opportunities for surface water management improvements and that opportunities for source control, slowing the flow and filtration of surface water are considered early. This could be achieved through a variety of features including:

- permeable surfacing;
- bioretention tree pits and landscaping;
- rain gardens;
- soakaways and filter drainage;
- retrofitted swales; and
- blue/green roofs.

A Co-ordinated and Holistic Approach to Infrastructure Delivery across the Site

We request that the applicant provides a site-wide strategy for foul and surface water and a site-wide strategy for clean water supply so that a holistic approach can be achieved which avoids a piecemeal approach to infrastructure delivery and to ensure that the most sustainable and cost effective approach to infrastructure is achieved. It is critical that the phasing of development is undertaken in accordance with a site-wide strategy for new water and wastewater infrastructure. This should consider how the infrastructure for each phase interacts with the infrastructure required for other phases. At the current stage, it is not clear to us how the applicant propose to develop / deliver the site and whether this will be done by one developer or by multiple developers. It is critical that the approach to delivery / development is reflective of a holistic infrastructure delivery. We request that any disposal of land is linked to the delivery of your holistic infrastructure strategy.

In accordance with our above comments, the foul and surface water strategy should fully assess site topography, infiltration potential, all forms of flood risk, existing water features and naturally occurring flow paths to identify where water will naturally accumulate and determine whether pumping may be required. Resultant layouts and levels should take account of such existing circumstances to ensure the most flood resilient solution is achieved.

Other Matters for Consideration

Wastewater Adoption – Including SuDS

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 United Utilities' Asset Standards. 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.

Water Efficiency

We request that the development considers how water efficiency measures can be incorporated into the future detailed design of the site. There are opportunities such as rainwater recycling and water butts and we would encourage the LPA to embrace all water efficiency measures. Modern design techniques can promote measures for water recycling to reduce the impact on infrastructure requirements.

Water efficiency should be a fundamental component of any approach to carbon neutrality and we request that you clearly set out your water efficiency and sustainable drainage expectations in the delivery of new development at this site. A tighter water efficiency standard in new development has multiple benefits including a reduction in water and energy use, as well as helping to reduce customer bills. Water efficiency is therefore a key component of your journey to carbon neutrality.

At the current time, Building Regulations includes a requirement for all new dwellings to achieve a water efficiency standard of 125 litres of water per person per day (l/p/d). In 2015 an 'optional' requirement of 110 l/p/day for new residential development was introduced, which can be implemented through local planning policy where there is a clear need based on evidence. Although not currently a local plan policy, we believe that the optional standard can be achieved at minimal cost.

To promote sustainable development, we wish to highlight that United Utilities offers a reduction in infrastructure charges for applicants delivering water efficient homes and drainage surface water sustainably. Full details of the qualifying criteria can be found on our website at <https://www.unitedutilities.com/builders-developers/new-connections-and-developer-services/>

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.

CONTACTS

We wish to highlight our free pre-application service for developers to discuss and agree drainage strategies and water supply requirements. We cannot stress highly enough the importance of developers contacting us as early as possible. Enquiries are encouraged by contacting:

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 - SewerAdoptions@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.

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

Yours faithfully

The Planning, Landscape and Ecology Team