



**United Utilities Water Limited  
Developer Services & Metering**  
2<sup>nd</sup> Floor, Grasmere House  
Lingley Mere Business Park  
Lingley Green Avenue  
Warrington  
WA5 3LP

Planning.liaison@uuplc.co.uk

Preston City Council  
Town Hall  
Preston  
PR1 2RLL

**Your ref:** 06/2018/1260  
**Our ref:** DC/18/5176  
**Date:** 25-JAN-19

Dear Sir/Madam,

**Location: Lightfoot Green Lane, Fulwood, Preston, PR4 0AP.**

**Proposal: Hybrid application for site re-profiling works (Full application) and the erection of 84no. dwelling.**

#### **Ground Water Protection**

**United Utilities has abstraction boreholes used for public water supply in the vicinity of this application which could be affected. The prevention of pollution to drinking water supplies is critical.**

**The Broughton (Lightfoot Green) boreholes represent a significant supply for United Utilities and as such, we must be confident that this development will not impact on groundwater quality in the aquifer. The application does not provide sufficient detail on the risks to groundwater protection associated with the proposed development at this location, or a proposed mitigation strategy to effectively deal with any potential risks to groundwater.**

Whilst a Phase I Geo-Environmental Investigation (E3P, Ref: 12-467-R01, October 2018) has been completed, there appears to be some inaccuracies and further investigation needed. The report states that the site is located within a Groundwater Source Protection Zone 2 (Outer Protection Zone) and the rating against this in Table 4.4 as moderate sensitivity. In reality, the western part is within Groundwater Source Protection Zone 1, bordering United Utilities boreholes, which is most likely to be of high sensitivity.

On the face of it, the BGS borehole logs indicate that the geology looks to offer the sandstone aquifer beneath adequate protection from groundwater pollution. However, the report notes that 'the exact drift conditions for the wider site cannot be known without an intrusive site investigation'. The data obtained is from United Utilities borehole logs, which aren't detailed enough to ascertain the exact ground conditions and hence risk to groundwater quality in the aquifer. On this basis, we are in agreement with E3P, that further intrusive site investigation is required. This is of particular relevance to the proposed settlement/attenuation pond. We need to be reassured that the natural ground conditions will not result in any leakage to groundwater, resulting in a risk to groundwater quality. If necessary, we may require an engineering solution to ensure this doesn't take place.

**Before the application is determined, in accordance with Policy EN7 'Land Quality' of the Preston Local Plan 2012-26 (Site Allocations & Development Management Policies, Adopted 2 July 2015) and the Environment Agency's Approach to Groundwater Protection (February 2018 Version 1.2), we request the applicant provides a quantitative and qualitative risk assessment and mitigation strategy with respect to groundwater protection details and any extra protection measures necessary to manage the risk of pollution to this public water supply and the water environment. The risk assessment should be based on the source-pathway-receptor methodology. It shall identify all possible contaminant sources and pathways for the life of the development and provide details of measures required to mitigate any risks to groundwater and public water supply from the development.**

The Environment Agency has a series of published position statements documenting their approach to managing and protecting groundwater. These are outlined in The Environment Agency's approach to groundwater protection. The attention of the applicant is drawn to the following key points from within these position statements:

**A5 - Supply of adequate information**

The Environment Agency expects developers and operators to provide adequate information to statutory bodies, including the Environment Agency, when submitting their proposals. This is so that the potential impact on groundwater resources and quality can be adequately assessed.

**G8 - Sewerage pipework**

The Environment Agency will require the use of the highest specification pipework and designs for schemes involving new sewerage systems in SPZ1 to minimise leakage.

**G12 - Discharge of clean roof water to ground**

The discharge of clean roof water to ground is acceptable both within and outside SPZ1, provided that all roof water down-pipes are sealed against pollutants entering the system from surface run-off, effluent disposal or other forms of discharge. The method of discharge must not create new pathways for pollutants to groundwater or mobilise contaminants already in the ground. No permit is required, if the above criteria can be met.

Together with the Environment Agency, United Utilities supports the principles of sustainable drainage systems (SuDS) for new discharges. Where infiltration SuDS are to be used for surface run-off from roads, car parking and public or amenity areas, they should have a suitable series of treatment steps to prevent the pollution of groundwater.

**G13 - Sustainable drainage systems**

The Government's expectation is that sustainable drainage systems (SuDS) will be provided in new developments wherever this is appropriate. The Environment Agency supports this expectation.

Where infiltration SuDS are to be used for surface run-off from roads, car parking and public or amenity areas, they should:

- be suitably designed;
- meet Government's non-statutory technical standards for sustainable drainage systems these standards should be used in conjunction with the National Planning Policy Framework and Planning Practice Guidance;

- use a SuDS management treatment train that is, use drainage components in series to achieve a robust surface water management system that does not pose an unacceptable risk of pollution to groundwater

United Utilities would appreciate further consultation when additional information is submitted by the applicant/agent. It is essential that we ensure that the application doesn't pose a risk to the surrounding groundwater environment, and should the applicants submit sufficient information to allow approval, we would wish to recommend a number of conditions.

#### **Water and Wastewater comments**

**A raw water main and sludge main cross the development site. According to our records these are both subject to easements in addition to our statutory rights for inspection, maintenance and repair. The easements dated 10/05/1972 UU Ref: F4045/F2605 (water main) & F4046 (Effluent) have restrictive covenants that must be adhered to. It is the responsibility of the developer to obtain a copy of the document, available from United Utilities Legal Services or Land Registry and to comply to the provisions stated within the document. Under no circumstances should anything be stored, planted or erected on the easement width. Nor should anything occur that may affect the integrity of the pipe or United Utilities legal right to 24 hour access.**

**We recommend the applicant contacts our Property Services team to discuss how the proposals may interact with the easements on site. They should contact [PropertyGeneralEnquiries@uuplc.co.uk](mailto:PropertyGeneralEnquiries@uuplc.co.uk).**

**All underground assets on site not subject to an easement will 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 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 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.

It is a considerable distance to a water main of adequate size to supply this development and as such our network will need extending to serve any development on this site and the applicant may be required to pay a contribution

Our standard conditions document includes details of trees and shrubbery suitable for planting in the vicinity of a pipeline. 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 pipeline.

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 these assets.

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.

### **General comments**

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.

It is the applicant's responsibility 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.

### **Supporting information - Drainage**

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 developers own risk and could be subject to change.

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

Shireen Lawrenson  
United Utilities  
Developer Services and Metering