

By email only: planning.strategy@blackpool.gov.uk

Blackpool Council
Planning Strategy Team
PO Box 17
Corporation Street
Blackpool
FY1 1LZ

Your ref:

Our ref:

Date: 11-APR-22

Dear Sir / Madam

BLACKPOOL COUNCIL – MARTON MOSS NEIGHBOURHOOD PLAN CONSULTATION

Thank you for your consultation seeking the views of United Utilities as part of the Neighbourhood Plan process. It is important that United Utilities is consulted about the Neighbourhood Plan as it identifies various allocations, over and above the allocations determined by the council in the wider development plan for Blackpool. United Utilities wishes to build a strong partnership with neighbourhood groups to aid sustainable development and growth.

Our Assets

It is important to outline the need for our assets to be fully considered in any future development proposals. We will not normally permit development over or in close proximity to our assets. All United Utilities' assets will need to be afforded due regard in the masterplanning process for sites and when bringing forward any transport or public realm improvements. This should include careful consideration of landscaping proposals in the vicinity of our assets and any changes in levels of land over our assets.

We strongly recommend that the LPA advises future applicants / promoters of the importance of fully understanding site constraints as soon as possible, ideally before any land transaction is negotiated, so that the implications of our assets on development can be fully understood. Where our assets exist on a site, we ask site promoters to contact United Utilities to understand any implications. All United Utilities' assets and associated easements will need to be afforded due regard in the design process as they may impact on deliverability dependent on the location within the site and the nature of the asset. We request that contact is made with United Utilities early to discuss the detail of proposals so that any potential issues can be explored and fully understood. This can be done using our **free pre-application service** using the below contact details.

We encourage you to direct future developers to our **free pre-application service** to discuss their schemes and highlight any potential issues by contacting:

Developer Services – Wastewater
Tel: 03456 723 723

Email: WastewaterDeveloperServices@uuplc.co.uk

Developer Services – Water

Tel: 0345 072 6067

Email: DeveloperServicesWater@uuplc.co.uk

Plans of our assets are available from a range of providers including our Property Searches team who can be contacted at <https://www.unitedutilities.com/property-searches/>.

Allocations for New Development

We note that there are new allocations for future development as part of policy MM4 (Housing Site Allocations). Evidence based work conducted to date to support the neighbourhood plan has not included any specific work on ground water or sewer flooding.

We wish to make the following comments regarding the site allocations.

Sewer Flood Risk

Existing public sewers pass through / near to the following draft allocation which modelling data identifies as being at a higher risk of sewer discharge. This represents a higher risk of public sewer flooding that affects the site.

Ref	AECOM Ref	Location	Appropriate forms of development
A	MM29	Adj. to Fern Bank, Division Lane	4 detached dwellings fronting Division Lane

Given this flood risk, we recommend that Marton Moss Neighbourhood Forum considers whether there are more appropriate locations for new development in the first instance. This reflects the sequential approach to flood risk in national planning policy and guidance.

Thereafter, if you are minded to continue to consider this allocation for new housing, we would recommend that this flood risk needs to be better understood prior to progressing the draft allocation any further. It will be particularly important to understand the topography of the site and any exceedance flow paths that would arise from the public sewer in storm events. We request that any future allocation is guided by a site-specific policy. Our recommended wording is below.

'Early dialogue with United Utilities will be required prior to the submission of a planning application due to the presence of utilities infrastructure within the site.

Existing public sewers pass through this site which modelling data identifies as being at a higher risk of sewer surcharge. These represent a higher risk of public sewer flooding that affects the site.

The existence of any flood risk from the public sewer may limit the capacity of the development site. The applicant will be required to engage with United Utilities prior to any design / masterplanning process to ensure development (including any residential curtilage and associated access) is not located in an area at risk of sewer flooding. Applicants should consider site topography and any exceedance flow paths. Resultant layouts and levels should take account of such existing circumstances to ensure the most flood resilient solution is achieved. Given the existence of flood risk, applicants should not assume that changes in levels or any proposed diversion of the public sewerage system will be acceptable as such proposals

could increase flood risk. It may be necessary to apply the sequential approach as outlined in national policy subject to the detail of the proposal that is brought forward.'

We also wish to note that our data indicates a modelled flood risk that affects **Midgeland Farm**. The source of flood risk is not clear. It appears to be associated with either the ditch system of watercourses or from the public sewer at this location. Noting that this site is proposed as a community park, we wish to understand the details of any proposals more fully to ensure that any masterplanning of the site takes account of any flood risk to ensure that there is no unacceptable level of flood risk to any part of the proposals.

In relation to the following sites, we wish to note that we are aware of sewer flooding incidents in the wider area.

Ref	AECOM Ref	Location	Appropriate forms of development
D	MM20	Adj. to Ral Mar, Sandy Lane	2 detached dwellings
E	MM27	Adj. to Lemmington House, Worthington Road	1 detached dwelling
P	MM14b	Dean Nurseries, Chapel Road	6 detached dwellings off new estate road
Q	MM14a	The Hollies, Chapel Road	1 detached dwelling

As a result, it is important that the detail of development proposals at these sites are carefully considered. We recommend inclusion of site-specific policy as follows.

'Applicants will be required to engage with United Utilities to agree the approach to drainage. This is critical as we are aware of the change in site levels and flooding incidents in the wider area. It could affect the detailed design of the site and result in the need to incorporate appropriate mitigating measures in the design of the proposal. Careful consideration will need to be given to the approach to drainage namely the point of connection to the public sewer; whether the proposal will be gravity or pumped; and the proposed finished floor and ground levels in the context of any connection to the public sewer. Any full submission should therefore include details of finished floor and ground levels alongside a drainage strategy. In accordance with the hierarchy for surface water management, no surface water will be allowed to discharge to public sewer.'

Existing Infrastructure

With respect to the following sites we wish to note that we have significant infrastructure that passes through these sites and we will not allow a build over of this infrastructure. It is important to note that the infrastructure is very large and therefore it is unlikely to be financially viable to divert. The applicant will need to work with the existing utility constraints and as a result it may not be possible to deliver the proposed number of dwellings as set out below.

Ref	AECOM Ref	Location	Appropriate forms of development
T	MM31	Adj. to Moss Lodge, Jubilee Lane North	3 detached dwellings fronting Jubilee Lane
U	MM30	Adj. to 58 Stockydale Road	2 detached dwellings fronting Jubilee Lane

As a result, of the significance of the infrastructure at the sites we recommend inclusion of the following site-specific policy wording for these sites.

'Early dialogue with United Utilities will be required prior to the submission of a planning application due to the presence of significant utilities infrastructure within the site. This infrastructure will be material to the design of the site and could limit the number of dwelling units that can be achieved.'

Comments on Additional Site Suggestions

With respect to the additional sites that have been promoted, United Utilities wishes to make the following comments.

Stan's Mowers, New Hall Avenue

If you were minded to allocate this site, we would recommend the inclusion of site-specific policy wording. The wording we recommend is as follows.

'Early dialogue with United Utilities will be required prior to the submission of a planning application due to the presence of utilities infrastructure within the site.'

Careful consideration will need to be given to the implications of any flood risk from the adjacent watercourse. Our modelling data indicates a level of flood risk from this watercourse. The existence of any flood risk from this watercourse may limit the capacity of the development site. The applicant will be required to engage with flood risk management agencies prior to any design / masterplanning process to ensure development (including any residential curtilage and associated access) is not located in an area at risk of flooding. Applicants should consider site topography and any exceedance flow paths. Resultant layouts and levels should take account of such existing circumstances to ensure the most flood resilient solution is achieved. It may be necessary to apply the sequential approach as outlined in national policy subject to the detail of the proposal that is brought forward.

The applicant will be expected to follow the hierarchy for the management of surface water with only foul flows discharging to the public sewer. Drainage proposals will need careful consideration prior to the grant of planning permission in accordance with the wider drainage policy' (see below recommended policy wording for foul and surface water drainage).

Grazing Land, Jubilee Lane North

If you were minded to allocate this site, we would recommend the inclusion of site-specific policy wording as follows.

The applicant will be expected to following the hierarchy for the management of surface water with only foul flows discharging to the public sewer. Drainage proposals will need careful consideration prior to the grant of planning permission in accordance with the wider drainage policy' (see below recommended policy wording).

Sustainable Drainage - Foul Water and Surface Water

Sustainable surface water management and the efficient use of water should be critical elements of the design and development process. As the Forum will be aware, green infrastructure can help to mitigate the impacts of high temperatures, combat emissions, maintain or enhance biodiversity and reduce flood risk. Green/blue infrastructure and landscape provision play an important role in managing water close to its source. If the necessary link between green/blue infrastructure, surface water management, landscape design and biodiversity is outlined as part of the strategic objectives for the plan, it will help

ensure that sustainable surface water management is at the forefront of the design process. We believe that raising this point at this stage in the preparation of the neighbourhood plan is in the best interest of delivering housing in the most sustainable and co-ordinated manner.

Surface water should be managed as close to its source as possible. Modern design techniques can promote measures for water recycling to reduce the impact on infrastructure requirements. There are opportunities such as rainwater recycling, green roofs and water butts and we would encourage the LPA to embrace all such water management measures.

With respect to Policy MM1 (Building Design), we note that this includes wording on sustainable drainage. We recommend that this is supplemented by a more detailed and separate drainage policy as set out below.

'All Applications for new development and proposals will be required to be supported by a foul and surface water management strategy. The hierarchy for the management of surface water should be followed and surface water will only be allowed to discharge to the public sewer as a last resort. Applicants will be required to incorporate sustainable drainage which is multi-functional and at the surface level in preference to conventional underground piped and tanked storage systems, unless, in exceptional cases, there are clear, justifiable and compelling reasons why this would be inappropriate.

Applicants should consider site topography, any naturally occurring flow paths, any exceedance flood paths from existing drainage systems, and any low lying areas where water will naturally accumulate. Resultant layouts should take account of such existing circumstances to ensure the most sustainable and flood resilient solution is achieved. Applications for the detail of development will be required to provide details, such as, ground and finished floor levels alongside details of the drainage strategy, to ensure the proposal is flood resilient.

Drainage will be required to be considered early in the design process and linked to any strategy for landscaping, biodiversity and public realm improvements. Any approach to landscaping will be required to be evaluated to identify opportunities for landscaping to be integrated with sustainable surface water management design objectives. The evaluation of surface water management opportunities should be undertaken early in the design process and identify SuDS opportunities such as:

- green roofs;*
- permeable surfacing;*
- soakways and filter drainage;*
- swales, including retrofitted swales;*
- bioretention tree pits/rain gardens;*
- basins and ponds; and*
- reedbeds and wetlands.*

Applications for new development must be accompanied by a management and maintenance regime for any drainage system. This should include a management and maintenance regime for any watercourse within the application site or an immediately adjacent watercourse where the application site is afforded riparian rights.'

We wish to emphasise that given the low lying nature of the area and the associated network of watercourses, we have recommended a policy that requires the submission of drainage proposals as part of the grant of planning permission. This is because drainage is critically linked to finished floor and ground levels and the wider detail of the design of a site. This will ensure that the detailed design of the

site is linked to a deliverable drainage strategy and one that is most resilient to climate change and/or the failure of any drainage features such as a blockage.

Water Efficiency

United Utilities wishes to recommend a water efficiency policy within the Neighbourhood Plan. Building Regulations Part G includes an optional standard for water efficiency of 110 litres per person per day (l/p/day) for new residential development which can be implemented through local planning policy where there is a clear need based on evidence. In this regard, we have enclosed evidence prepared by Water Resources West to support the adoption of the Building Regulations optional requirement for local authorities in North West England and the Midlands. We therefore recommend the inclusion of the following wording in a new policy within the Neighbourhood Plan regarding water efficiency:

'All new residential development must achieve as a minimum the optional requirement set through Building Regulations for water efficiency that requires an estimated water use of no more than 110 litres per person per day. Non-domestic buildings will be expected to achieve a BREEAM rating of 'Excellent'.'

We wish to highlight that improving water efficiency makes a valuable contribution to water reduction as well as carbon reductions as water and energy efficiency are linked. We also wish to note the associated societal benefits by helping to reduce customer bills.

Climate Change

United Utilities would wish to highlight its support for a climate change policy within the Neighbourhood Plan. The policy should reference sustainable surface water management and the efficient use of water as critical elements of the delivery of sustainable development. We would encourage any policy on climate change to be intrinsically linked to wider policies in the neighbourhood plan including those relating to the design of development and the provision of green and blue infrastructure. We would also be keen to ensure any climate change policy gives appropriate emphasis to natural flood management techniques, multi-functional sustainable drainage and designing new development so that it is resilient to the challenges of future climate change and the incorporation of water supply efficiency measures.

Landscaping

United Utilities would wish to highlight its support for a landscaping policy within the Neighbourhood Plan. We request that the Neighbourhood Plan gives thought to the proposed approach to any landscaping. The evaluation of surface water management opportunities should be undertaken early in the design process and intrinsically linked to opportunities for surface water management improvements.

We would encourage the proposed approach to landscaping to be evaluated to identify opportunities in line with objectives 6 and 7 in addition to potentially being included within policies MM1 (Building Design), MM2 (Open Land Character) and MM9 (Local Green Space). We specifically request that the Forum considers opportunities for source control and slowing the flow of surface water as part of any landscaping, which could be achieved through:

- permeable surfacing;
- retrofitted swales; and
- bioretention tree pits/rain gardens.

We would also encourage water re-use opportunities in redevelopment proposals such as grey water recycling. In order to assist the consideration of the above options, we have enclosed some case studies

taken from the [Susdrain website](#) which provide imagery of example SuDS components. United Utilities wishes to recommend the following wording for inclusion within the neighbourhood plan.

‘Any approach to landscaping will be required to be evaluated to identify opportunities for landscaping to be integrated with sustainable surface water management design objectives. The evaluation of surface water management opportunities should be undertaken early in the design process and identify SuDS opportunities such as:

- *Permeable surfacing;*
- *Retrofitted swales and storage areas;*
- *Bioretention tree pits / rain gardens. ‘*

Summary

If you have any queries or would like to discuss this representation, please do not hesitate to contact me

Yours faithfully

Andrew Leyssens
Planning, Landscape and Ecology
United Utilities Water Limited

Encl. Susdrain Examples
Water Resources West Evidence