CONSULTATION ON THE BURSCOUGH PARISH NEIGHBOURHOOD PLAN SUBMISSION VERSION
– United Utilities response.

Please refer to the attached consultation from the previous consultation. United Utilities would like to note that we are happy to see that the recommended policy from the previous response has been included in the submission version.

For the purpose of this response, we would like to highlight 6.1.20 below in the submission version of the Neighbourhood Plan.

Reasoned Justification:

6.1.20 The West Lancashire Infrastructure Delivery Plan Update 2016/17 (Part 1) March 2017 highlights capacity issues with the sewer network and at the New Lane Waste Water Treatment Works (WWTW). In terms of the former there is a bottleneck in the system as the sewer narrows beneath the railway line. During intense rainfall the combined sewer network is unable to move the foul and surface water runoff through the network quickly enough leading to flooding of both surface and foul water. This is an unacceptable situation leading to public health issues as well as costs to people's properties and livelihoods. It is therefore of great importance that the Water Hierarchy (see below) is followed to reduce the impact of new development in the area.

United Utilities would strongly recommend amendments to the wording in 6.1.20, as it is not accurate of the current situation. There are no capacity issue at New Lane Wastewater Treatment Works. We would request removing this aspect as it isn’t correct and are happy to discuss this further.

We would like to suggest the following amendments, to replace 6.1.20:

There is a bottleneck in the sewer system as the sewer narrows beneath the railway line. In very intense rainfall this can lead to sewer flooding at locations within the Burscough sewer network. It is therefore of great importance that the surface water hierarchy is followed to prevent it from entering the combined sewer network and ensuring new development is delivered in the most sustainable way.

Please do not hesitate to contact me for any clarification on the above.

Regards,

[Developer Services & Metering
Network Delivery
United Utilities
unitedutilities.com]

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Dear Consultee,

CONSULTATION ON THE BURSCOUGH PARISH NEIGHBOURHOOD PLAN SUBMISSION VERSION

West Lancashire Borough Council are undertaking public consultation on the Burscough Parish Neighbourhood Plan Submission Version during which time comments are invited upon the content of the plan and the evidence base which has been used to inform the preparation of it.

The neighbourhood plan has been prepared by Burscough Parish Council in consultation with the local community and has now been passed to West Lancashire Borough Council as the responsible body to take forward to completion (called being 'made') in accordance with the Neighbourhood Planning (General) Regulations. Once 'made' it would then be used to determine planning applications in the Burscough parish area alongside the West Lancashire Local Plan and other local and national planning policies.

The neighbourhood plan contains a vision, objectives and policies for the Burscough parish area, covering a time period to 2027. It will shape what development takes place in the future and where, what new buildings will be expected to look like, what new infrastructure may be needed and which sites, such as open spaces, should be protected.

Consultation Period
The consultation period in which you can submit your comments to the Borough Council will run between Wednesday 9 January and Wednesday 20 February 2019. Within this 6 week period you will be able to comment on the Burscough Parish Neighbourhood Plan Submission Version proposals and view copies of the relevant documents, including evidence base.

Following the close of public consultation Borough Council officers will collate the responses received and are required to send them, along with the Submission Neighbourhood Plan and supporting evidence, to an independent examiner who will consider if the plan is satisfactory.

Find out more
If you wish to view the Burscough Parish Neighbourhood Plan Submission Version, and all the supporting information and evidence you can visit the Council's website:

www.westlancs.gov.uk/np
(if this link does not work please copy and paste into your internet browser)
or alternatively you could visit one of the following locations where a paper version of the documentation will be available:

- Martland Mill, Mart Lane, Burscough;
- Burscough library, Mill Lane;
- The Grove Community Centre, Station Approach, Burscough; and
- West Lancashire Borough Council offices, 52 Derby Street, Ormskirk.

Further details of the stages of preparation of a neighbourhood plan, including what the Parish Council has done previously, can be found using the above link to the Council's website.

**Submitting your comments**
If you wish to submit your comments on the Local Plan Review Preferred Options please do so in writing between **Wednesday 9 January and Wednesday 20 February 2019**. The quickest and easiest way is online at [www.westlancs.gov.uk/np](http://www.westlancs.gov.uk/np). Alternatively, you can complete a comments proforma (available online or from the above venues), and return it to Local Plan Team, West Lancashire Borough Council, 52 Derby Street, Ormskirk, L39 2DF or at email localplan@westlancs.gov.uk

If you require any further information, please telephone [Redacted] to speak to a Borough Council officer or email localplan@westlancs.gov.uk

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**Kind regards**

______________________________
Tel: [Redacted]
West Lancashire Borough Council
52 Derby Street, Ormskirk, L39 2DF

[www.westlancs.gov.uk](http://www.westlancs.gov.uk)
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United Utilities Water Limited

Developer Services and Planning
1st Floor Grasmere House
Lingley Mere Business Park
Lingley Green Avenue
Great Sankey
Warrington  WA5 3LP

planning.liaison@uuplc.co.uk

Your ref
Our ref
Date 17th October 2017

Burscough Parish Council
Martland Mill
Mart Lane
Burscough
L40 0SD

Emailed to

Burscough Neighbourhood Plan

Thank you for your email and links to the draft neighbourhood plan.

United Utilities works closely with West Lancashire Borough Council to understand future development sites and impact on our infrastructure.

The Neighbourhood Plan recognises the amount of existing permissions in the town and we are aware of developments within the area. Much of the development is located within the defined settlement and strategic allocations which are identified in the adopted Local Plan.

United Utilities will be able to better understand the impact of development on our network as more information becomes available on development proposals such as the approach to surface water drainage, points of connection, and the timing for the delivery of development, which is often only available at the planning application stage.

Applicants should therefore ensure early liaison with United Utilities alongside the respective lead local flood authorities to ensure the impact of development on the public sewer and watercourses is managed in accordance with national standards. United Utilities requests that developers/applicants engage in early dialogue regarding any development proposal.

We wish to highlight our free pre-application service for applicants to discuss drainage strategies. We cannot stress highly enough the importance of contacting us as early as possible alongside
discussions with the Lead Local Flood Authority and where relevant, the Environment Agency. Enquiries should be made to:

Developer Services - Wastewater
Tel: 
Email: WastewaterDeveloperServices@uuplc.co.uk
Website: http://www.unitedutilities.com/builder-developer-planning.aspx

Developer Services – Water
Tel: 
Email: DeveloperServicesWater@uuplc.co.uk
Website: http://www.unitedutilities.com/newwatersupply.aspx

It is important that United Utilities is kept aware of any additional development proposed within your neighbourhood plan over and above the Council’s allocations. We encourage further consultation with us at an early stage should you look to allocate any other additional sites in the future.

**Specific comments**
With regards to policies within the Neighbourhood Plan, United Utilities is pleased to see attention given to infrastructure provision. That said, United Utilities recommends that some of the wording within the Neighbourhood Plan is altered.

We suggest that BPI4 is amended and strengthened as set out below.

**Insert** – “The approach to surface water drainage should be considered in liaison with the LLFA, the public sewerage undertaker and where appropriate the Environment Agency.

Surface water should be discharged in the following order of priority:

- An adequate soakaway or some other form of infiltration system.
- An attenuated discharge to watercourse or other water body.
- An attenuated discharge to public surface water sewer.
- An attenuated discharge to public combined sewer.

The treatment and processing of surface water is not a sustainable solution. Surface water should be managed at source and not transferred. Every option should be investigated before discharging surface water into a public sewerage network. A discharge to groundwater or watercourse may require the consent of the Environment Agency. Applicants wishing to discharge to public sewer will need to submit clear evidence demonstrating why alternative options are not available.

The preference will be for new development to include genuine sustainable drainage systems as opposed to underground tanked storage systems for surface water.

Approved development proposals will be expected to be supplemented by appropriate maintenance and management regimes for surface water drainage schemes.
On greenfield sites, applicants will be expected to demonstrate that the current natural discharge solution from a site is at least mimicked.

On previously developed land, applicants should target a reduction of surface water discharge in accordance with the non-statutory technical standards for sustainable drainage produced by DEFRA. In demonstrating a reduction, applicants should include clear evidence of existing positive connections from the site with associated calculations on rates of discharge. Where there are no existing positive connections, applicants will be expected to target greenfield run off rates.

Landscaping proposals should consider what contribution the landscaping of a site can make to reducing surface water discharge. This can include hard and soft landscaping such as permeable surfaces.

On large sites it may be necessary to ensure the foul and surface water drainage proposals are part of a wider, holistic strategy which coordinates the approach to drainage between phases, between developers, and over a number of years of construction. The applicant will be expected to include details of how the approach to foul and surface water drainage on a phase of development has regard to interconnecting phases within a larger site. Infrastructure should be sized to accommodate flows from interconnecting phases and drainage strategies should ensure a proliferation of pumping stations is avoided on a phased development. 

We note the content of BPI15, which relates to the foul sewerage system. It is important to explain that this policy should be drafted in the context of our statutory obligations. Importantly, as there is a right to connect to the public sewer, we must allow new connections. Also, we have to explain that we are not able to request financial contributions through the planning system to upgrade the public sewer system as a result of new development proposals coming forward.

Notwithstanding these points, we wish to emphasise the importance of early dialogue with United Utilities on foul drainage proposals so that the approach can be considered in detail and most appropriately managed and controlled.

**Summary**
Moving forward, we respectfully request that the Parish Council continues to consult with United Utilities for all future planning documents. We are keen to continue working in partnership to ensure that all new growth can be delivered sustainably.

In the meantime, if you have any queries or require further clarification on any of the above matters, please do not hesitate to contact me on 

Yours faithfully

[Redacted]

United Utilities Water Limited