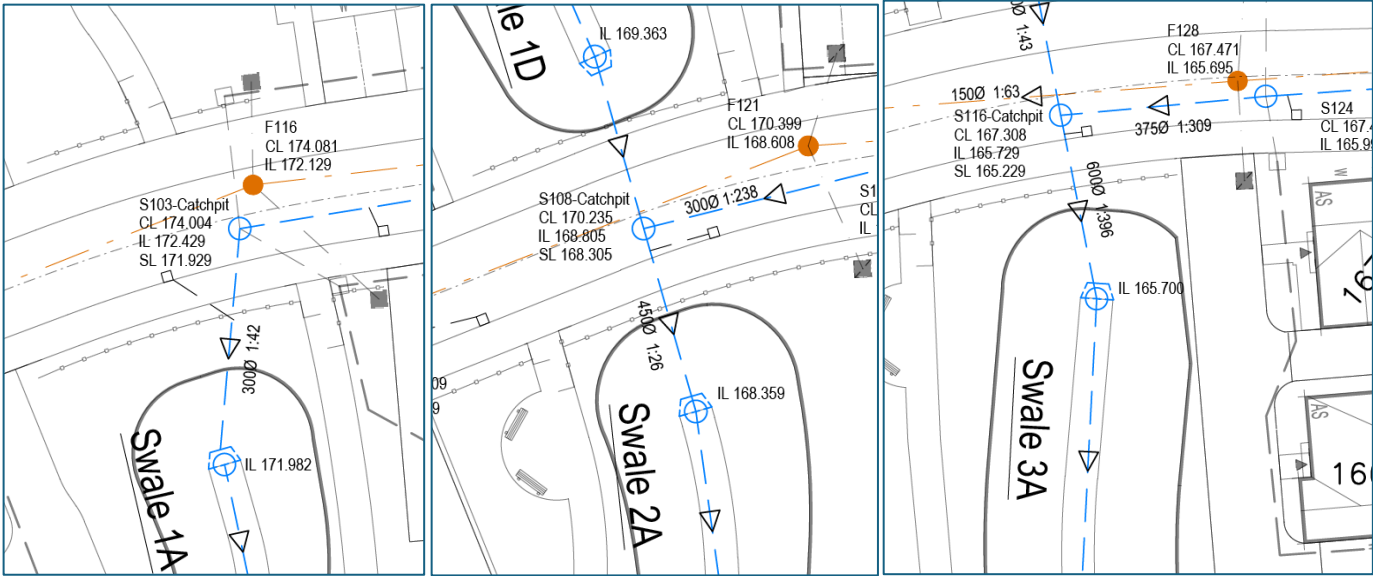


Cowm Top, Castleton, Rochdale

Application Reference 22/01190/FUL.

Response to LLFA Comments dated 6th November 2024

	Consultee Comment	Barratt Response
1	The drainage proposals are acceptable in principle.	Noted.
2	I note the fisheries issues are resolved and considered closed.	Agreed. RADAS removed their objection in an email to Barratt Manchester dated 23 rd Oct 2024.
3	The strategy proposes to offer the principal drainage networks for s104 adoption which is welcomed. However, there are no details regarding UU assessment.	United Utilities have been consulted as statutory consultee to this application. UU have provided approval in principle via letter to the LPA dated 17 th October 24, a copy of which is attached below.
4	UU usually require a two stage treatment train for highway runoff. However, adoptable highways only indicate a conventional gulley arrangement.	United Utilities have provided approval in principle, as noted in Point 3 above. It should be noted that the above drawing is not the final design, as the scheme will still be required to go through the checking and technical approval process with United Utilities in which any additional requirements needed by United Utilities will be added/discussed. Notwithstanding the above, the drainage strategy report mentioned above, provides a description of the water quality treatment train employed, as well as a water quality treatment assessment in accordance with the Ciria SUDS Manual. As well as each gully being a silt trap, the highway drainage, passes through a catchpit manhole before the basin, the Forebay, the Basin, and finally the Wetland, before it discharges to the watercourses. Essentially a 5-stage water quality treatment train. This is over and above the requested minimum of 3 stages written into the SUDS manual but is required to ensure the water discharged to the fisheries lodges is as clean as it can be.
5	We would query why only parts of the site are routed via a central swale. The remainder are conventionally drained down to the detention basins which appear to be providing regional control. We would advise that more local control features (e.g. swales, treepits, raingardens etc.) along highways routes are incorporated.	Whilst source control features are aspirational, the reality of them is that their use is often precluded by other constraints such as adoption issues, ownership issues, maintenance issues, geotechnical issues, issues with topography, and feasibility issues, to name but a few. Source control features such as rain gardens etc are typically precluded because United Utilities refuse to adopt them. UU will also stipulate that the drainage should be designed excluding the source control features, just in case the resident or residents’ management company remove the source control features. This in turn removes any cost- benefit of the source control features, but at the expense of increased costs and increased maintenance liability. Tree pits are again another feature that often get requested, but again, UU will not allow us to include them in the drainage calculations, and UU nor councils want to adopt them. Even if councils do adopt the trees, they don’t want to adopt the drainage aspect of it. Trees will sometimes be adopted at the expense of significant commuted sums and increased maintenance liability, but with little cost-benefit to the overall drainage design. Until our regulators come up with a holistic approach to adoption, management and maintenance of source control features, it makes implementation on residential schemes such as this very difficult. In reference to the Swales, the site topography and ground conditions have meant we are restricted in where swales could be positioned. The ground conditions have been reported as being very fine sands, which may be susceptible to being washed away by significant water flow. This can be overcome with clay lining, but we don’t have significant volumes of clays present within the ground and would therefore require import. We have therefore used Swales sparingly, mainly to aid in the water treatment, to provide betterment to biodiversity, and provide areas of natural play. The central swale coincides with a linear piece of POS, requested to improve connectivity through the site. It is for the above reasons that we have chosen to include just one central swale.

		Aside from the physical constraints, we must consider the cost-benefit of each of these source control features, which often take up land, which results in loss of plots, increased costs, and has a detrimental impact on viability, which often results on reduced numbers of affordable housing that can be offered. Given the above, as developers we must provide a balance of deliverability, cost effectiveness, complying with our planning obligations, satisfying the regulators, and providing schemes where people want to live, and as such it is not always possible to include source control measures, and other SUDS features. As the LLFA has stated in point 1 that “the drainage proposal are acceptable in principle”, and in point 8 that “The design is considered to be sufficiently detailed to avoid a pre-commencement condition”, and that the design satisfies all the requirements for drainage discharge rates and water quality treatment, we see no need to add any further local source control features.
6	We would advise that inlets to the central swales incorporate sedimentation controls similar to the basins.	Noted. We have added catchpits at the manhole before the central swale inlets. Manholes S103, S108, S116 are now catchpit manholes. See the screenshot presented below. We do not need a forebay in each swale as the swales are already partitioned with the weir walls, which will act as the forebay. Adding a separate additional forebay will only serve to reduce the swale volume capacity. The following drawings have been revised to add catchpits to the inlet of the Swales. H8544-BAH- XX-XX-DR-CE-300001 Rev P06 – Preliminary Engineering Layout Sheet 1 H8544-BAH- XX-XX-DR-CE-300002 Rev P07 – Preliminary Engineering Layout Sheet 2 H8544-BAH- XX-XX-DR-CE-300003 Rev P05 – Preliminary Surface Water Drainage Strategy (attached below) Drainage Strategy Report Rev G Nov 24 
7	If planning approval is granted then it should include references and compliance with the reviewed documents.	Agreed.
8	The design is considered to be sufficiently detailed to avoid a “pre-commencement” condition, but should include a “pre-occupation” condition to demonstrate that any subsequent detailed or construction designs have adhered to the approved proposals.	We are pleased to see that no pre-commencement condition is required. Whilst we agree in principle to including a condition to ensure adherence to the design, we would prefer this not to be related or worded to include any reference to “Pre-occupation”. This is because a scheme this size is likely to take 5-6 years to complete, and given the complexities of the remediation, regrade, the number of sewer networks, and cost feasibility, it is not practicable to have the full drainage network constructed, prior to the first occupation. There may be several years between the first basin being constructed, and the last basin being constructed or required.

		Even if the condition asks for a phased completion reporting, the condition will remain undischarged until all phases are complete. This causes us significant problems when selling houses, as we are often prevented from selling and occupying plots if planning conditions are undischarged. We would therefore prefer to see a condition that requires completion reporting only for the full site, which may be timed to read “prior to the final occupation”.
--	--	--

Rochdale Borough Council
By email

Your ref 22/01190/FUL
Our ref DC/22/3629 V3
Date 17-OCT-24

Dear Planning Team

Location : Land South Of Cown Top Lane , Castleton , Rochdale

Proposal : Residential development comprising 495 dwellings with associated access, carparking, landscaping

United Utilities provides the following comments to support the Local Planning Authority in their determination of the planning application detailed above, and to direct the applicant to further sources of support and guidance on matters that might impact their proposal.

The letter and Appendix should be read in their entirety to support the determination, the design, and should the scheme be approved, the subsequent delivery of the proposal.

DRAINAGE

Following our review of the submitted Drainage Strategy, we can confirm the proposals are acceptable in principle to United Utilities and therefore should planning permission be granted we request the following condition is attached to any subsequent Decision Notice:

REQUESTED CONDITION:

The drainage for the development hereby approved, shall be carried out in accordance with principles set out in the submitted Foul & Surface Water Drainage Design Drawing H8544 300002, - Dated March 24 which was prepared by Barratt Homes. No surface water will be permitted to drain directly or indirectly into the public sewer. Prior to occupation of the proposed development, the drainage schemes shall be completed in accordance with the approved details and retained thereafter for the lifetime of the development.

Reason: To ensure a satisfactory form of development and to prevent an undue increase in surface water run-off and to reduce the risk of flooding.

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 a main river).

To discuss their drainage proposals the applicant should contact our **Developer Services** team by email at SewerAdoptions@uuplc.co.uk. Alternative ways to contact the team are detailed in the Appendix, Section 4.0 'Contacts'.

When considering their drainage proposal, the applicant should investigate the existence of any pipelines and/or apparatus that might impact their detailed design (see Section 'UNITED UTILITIES' PROPERTY, ASSETS AND INFRASTRUCTURE').

United Utilities will not carry out an assessment on the acceptability of submitted drainage proposals in relation to our water pipelines when responding to a planning application. It is the applicant's responsibility to ensure that any detailed drainage plans comply with our 'Standard Conditions for Works Adjacent to Pipelines' which can be found on our website: [Working near our pipes - United Utilities](#). Failure to consider existing pipelines when designing a drainage proposal may result in the applicant having to redesign proposals at a later date.

Management and maintenance of Sustainable Drainage Systems (SuDS)

Without effective management and maintenance SuDS can fail or become ineffective which may have a detrimental impact on the surrounding area. There is also a risk ineffective SuDS could impact the performance of the public sewer network where the two systems interact. Therefore, when SuDS is included in a proposed development, we recommend the Local Authority include a condition relating to SuDS management and maintenance in any subsequent Decision Notice. We provide an example condition below that may be suitable in many circumstances.

Prior to occupation of the development a sustainable drainage management and maintenance plan for the lifetime of the development shall be submitted to the local planning authority and agreed in writing. The sustainable drainage management and maintenance plan shall include as a minimum:

- (i) Arrangements for adoption by an appropriate public body or statutory undertaker, or, management and maintenance by a resident's management company; and*
- (ii) 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.*

The development shall subsequently be completed, maintained and managed in accordance with the approved plan.

Reason: To ensure that management arrangements are in place for the sustainable drainage system in order to manage the risk of flooding and pollution during the lifetime of the development.

Please note United Utilities cannot provide comment on an asset that is owned by a third-party management and maintenance company. Therefore, whilst we recommend the inclusion of a management and maintenance condition, United Utilities would not be involved in its discharge.

UNITED UTILITIES' PROPERTY, ASSETS AND INFRASTRUCTURE

It is the applicant's responsibility to investigate the existence of any pipelines that might cross or impact their proposed site and also to demonstrate the exact relationship between United Utilities' assets and the proposed development. The applicant should not rely solely on the detail contained within asset maps when considering a proposed layout.

It is important that the supporting information contained in the Appendix, Section 2.0 'United Utilities' Property, Assets and Infrastructure', is read in conjunction with this letter. This provides information that might impact a proposed layout and additional guidance that an applicant or developer must consider when United Utilities assets are located in, or in the locality of, the proposed site.

Where United Utilities' assets exist, it is essential that the applicant, or any subsequent developer, contacts our Developer Services team prior to commencing any works on site, including trial holes, groundworks or demolition. See Appendix, Section 4.0 'Contacts'

WATER EFFICIENCY IN NEW DEVELOPMENT

Local planning authorities have the option to set additional technical requirements in respect of water use for the construction of new build dwellings, exceeding the minimum standards required by Building Regulations. All new homes are required to meet the mandatory national standard of 125 litres of water used per person per day as set out in Building Regulations Approved Document G. Where there is a clear local need, a local planning authority's development plan policies can require new-build dwellings to meet the tighter Building Regulations optional requirement of 110 litres of water used per person per day. If your adopted development plan includes a policy that implements the tighter water efficiency standard for new-build dwellings in Part 3 of Building Regulations, you should ensure that this is a condition of any planning permission you may grant. You should also consider whether there is any adopted development plan policy relating to a water efficiency in the construction of non-residential development. As this is a matter for the local planning authority / building control body, United Utilities would not be involved in the discharge of conditions relating to water efficiency.

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

Yours faithfully

The Planning, Landscape and Ecology Team

SURFACE WATER DRAINAGE STRATEGY NOTE

This strategy has been produced in conjunction with the RSK Flood Risk Assessment and Drainage Report reference 881680 R1 (07)FRA.

This preliminary strategy drawing should be read in conjunction with the 'Report on Drainage Design Strategy to Accompany Planning Application Rev B'.

SURFACE WATER DRAINAGE STRATEGY KEY

- | | | | |
|--|--|---------------|---|
| | S104 Adaptable Surface Water
Sewer & Manhole with Preliminary Cover Levels and Invert Levels | 150.00 | Preliminary Final Flow Details
subject to Final Flow Details |
| | Proposed Surface Water Drain-Off and Proposed Invert Level | D = | S38 Adaptable High Duty/Adaptable Runoff Drainage |
| | Indicator Road of Proposed Private Plot SW Drainage | | |
| | Proposed Impedible Areas (Roof, Drive, Highway etc) Contributing to Network 2 | | Proposed Outfall/Discharge of Network 1 & Proposed Maximum Discharge Rate |
| | Proposed Impedible Areas (Roof, Drive, Highway etc) Contributing to Network 2 | | Proposed Outfall/Discharge of Network 2 & Proposed Maximum Discharge Rate |
| | Proposed Impedible Areas (Roof, Drive, Highway etc) Contributing to Network 2 | | Proposed Outfall/Discharge of Network 3 & Proposed Maximum Discharge Rate |
| | Proposed S104 BSHN (Sustainable Urban Drainage System) drainage features designed to accommodate surface water runoff from the site including the 1 in 100yr return period design rainfall.
Also designed to provide water quality benefits as quantified within the drainage calculations document. | | Proposed S104 SWALE (Sustainable Urban Drainage System) drainage features designed to accommodate surface water runoff from the site including the 1 in 100yr return period design rainfall.
Also designed to provide water quality benefits as quantified within the drainage calculations document. |
| | Proposed S104 RETLAND (Sustainable Urban Drainage System) drainage features designed to provide water quality and infiltration benefits as quantified within the drainage calculations document. | | Proposed Flow Control Chamber with mechanical flow control device set to restrict flow rate to those shown. |
| | Proposed Adaptable Catch-pit Manhole for all manholes maintained in accordance with the Management and Maintenance Policy. | | OUTLET SITE 1
Existing Inlet/outlet location to existing fates/ing as referenced in RSE water baseline study report |
| | Existing Watercourse 'Trub Brook' Historically deemed to form Flood Zone 300m from, now fates/ing. | | Existing Watercourse |
| | Approx. Proposed S104 Sewer Element | | Land required by developer and/or contractor in order to complete outfall works |
| | Site application boundary. Proposed Primary Water Strategy drainage. H2544-xx-xx-xx-DR-CE-3000m for scheme details. | | Proposed Adaptable Four Waste Pumpstations. See preliminary Flow Water Strategy drainage. H2544-xx-xx-xx-DR-CE-3000m for scheme details. |

PRELIMINARY ONLY

DRAINAGE DESIGN IS SUBJECT TO FULL
TECHNICAL APPROVAL BY UNITED
UTILITIES/ NAV AND THE LLFA.

P05	MH's 103, 108, 116, 126 have been amended to catch-pit MH's. Sump levels have been added to every catch-pit MH.	08.11.24	LB
P04	Included the most recent planning layout showing the revised proposed access track.	16.10.24	LB
P03	Corrected misspelling from 40%CC to 45%CC.	19.09.24	LB
P02	SUDs Wetland features added.	05.07.24	LB
P01	First issue. Draughted by RB	06.06.24	RB
Revision	Description	Date	Design