Matter 3

# Response of United Utilities Water Limited

Question 18 – The Policies

May 2025

# 1) United Utilities Water Limited (UUW)

UUW is the statutory water and wastewater undertaker for the north west of England and its area of operation includes Sefton. UUW is a statutory consultee in the preparation of development plans. This includes working with developers and local planning authorities on the risk of flooding from the public sewer and the delivery of on-site infrastructure, which includes detailed consideration of drainage proposals.

#### 2) National Policy and Guidance

#### Flood Risk from Overwhelmed Sewers and Drainage Systems

When considering flood risk and the location of development, it is important to highlight that a development plan should give sufficient emphasis to all forms of flood risk including sewer flood risk. This is clear from the National Planning Practice Guidance (NPPG) which defines flood risk as (underlined sections identify our emphasis):

What is "flood risk"?

"Flood risk" is a combination of the probability and the potential consequences of flooding. Areas at risk of flooding are those at risk of flooding <u>from any source</u>, now or in the future. Sources include rivers and the sea, direct rainfall on the ground surface, rising groundwater, <u>overwhelmed sewers and drainage systems</u>, reservoirs, canals and lakes and other artificial sources. Flood risk also accounts for the interactions between these different sources. This term is key to the application of the presumption in favour of sustainable development in paragraph 11 of the National Planning Policy Framework.

Paragraph: 001 Reference ID: 7-001-20220825'

Having regard to the above definition, Paragraphs 171 and 172 of the National Planning Policy Framework are clear that:

'171. Strategic policies should be informed by a strategic flood risk assessment, and should manage flood risk from all sources. They should consider cumulative impacts in, or affecting, local areas susceptible to flooding, and take account of advice from the Environment Agency and <u>other relevant flood risk management authorities</u>, such as lead local flood authorities and internal drainage boards.

172. All plans should apply a sequential, risk-based approach to the location of development – taking into account <u>all sources of flood risk</u> and the current and future impacts of climate change – so as to avoid, where possible, flood risk to people and property.'

In this context, strategic flood risk assessments should show <u>all sources of flood risk</u>, now and in the future, and should take account of advice from the relevant wastewater undertaker.

# 3) Inspectors' Questions

Q18. Have the recommendations in the SFRA Overview Update been incorporated into the Plan? Are they necessary for soundness?

## Sewer Flood Risk

In our submission to the publication draft AAP, UUW highlighted a range of sites where there is a risk of sewer flooding. This risk will need to be carefully considered in the design and masterplanning process for any development. Applicants will be required to engage with UUW prior to any masterplanning process to ensure development is not located in an area at risk of flooding from the public sewer. 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 and applicants should not assume that sewers can be diverted.

We note that the Council has suggested amendments to Policy BAAP1 Design Part 9 and Paragraphs 5.10 and 5.10a. The amendments to Paragraph 5.10a now refer to the flood risks '*indicated in the Strategic Flood Risk Assessment*', however, there is no reference in the Strategic Flood Risk Assessment to the specific sewer flood risks we have identified at sites. To ensure that the requirements of this policy are clear and unambiguous, we request that the sites at risk of sewer flooding which were identified in our submission to the publication draft are listed within the Strategic Flood Risk Assessment and within the AAP. This will ensure that it is clear that there is a risk of sewer flooding which must be fully considered in the preparation of any applications for planning permission. The sites are listed below.

Site Ref.	
BH1	The 'Peoples' Site, Linacre Lane
BAAP4	Bootle Town Centre (particularly affected Strand Shopping Centre
BAAP5	Bootle Office Quarter
BAAP6	Bootle Civic and Education Quarter
BAAP21	Bootle Village
BE1	Canal Street/Berry Street
BE2	Maritime Enterprise Park
BE3	Hawthorne Road/ Aintree Road
BE5	Land Between Regent Road and A565

#### Table 1. On-site Modelled Sewer Flood Risk

BE7	Bootle Office Quarter
BE8	Atlantic Park
BE9	Senate Business Park
BR3	Land between Hawthorne Road and Vaux Crescent/Place

### Table 2. Sites with a Record of Sewer Flooding On the Site / in the Vicinity

Site Ref.	Site Name
BAAP4	Bootle Town Centre
BAAP5	Bootle Office Quarter
BAAP6	Bootle Civic and Education Quarter

# Sustainable Foul and Surface Water Drainage and Infrastructure

Consistent with the representation of UUW to the publication version of the AAP, we also wish to take this opportunity to highlight the importance of ensuring that policy requires applicants to secure the most sustainable approach to the management of surface water. Alongside the need to consider flood risk from all sources, it is critical that policy outlines clear requirements in respect of:

- the application of the hierarchy of drainage options for the management of surface water;

- the need for drainage and the masterplanning of a site to be approached and delivered on an allocation-wide basis and considered in a holistic manner; and

- the need for sustainable drainage to be multi-functional and integrated with the on-site green and blue infrastructure in clear preference to a reliance on conventional piped and underground storage drainage systems.

Our focus on the need to sustainably manage foul and surface water at all allocations is consistent with the Environment Act 2021, which places a clear obligation on sewerage undertakers in England to secure a progressive reduction in the adverse impacts of discharges from storm overflows to reduce the impacts on the environment and public health. Consistent with this obligation, UUW recommends a number of amendments to policy in our publication draft submission so that the requirements for flood risk, sustainable surface water drainage and allocation-wide strategies for infrastructure are clear. This is critical to ensure that policies contribute to the mitigation of, and adaption to, climate change.

Word count: 1,037