

By email only: localplan@burnley.gov.uk

Your ref:
Our ref:
Date: 23-JUN-25

Dear Sir / Madam

WORSTHORNE AND HURSTWOOD NEIGHBOURHOOD DEVELOPMENT PLAN 2024-2032 (JUNE 2025)

Thank you for your consultation seeking the views of United Utilities Water Limited (U UW) as part of the Neighbourhood Plan (NP) for Worsthorne and Hurstwood. U UW wishes to build a strong partnership with neighbourhood groups to aid sustainable development and growth.

Allocations for New Development

Following our review of the NP, we note that there are no site-specific allocations for new development above and beyond those already identified in the wider development plan for Burnley. If this were to change, we would request early dialogue so that we can inform the site selection process and ensure any issues that are a concern to us are highlighted to you as early as possible.

Our Assets

It is important to outline the need for our assets to be fully considered in any proposals in the NP Area.

U UW will not allow building over or in close proximity to a water main.

U UW will not allow a new building to be erected over or in close proximity to a public sewer or any other wastewater pipeline. This will only be reviewed in exceptional circumstances.

Site promoters should not assume that our assets can be diverted.

On occasion, an asset protection matter within a site can preclude delivery of a proposed development. It is critical that site promoters / applicants engage with U UW on the detail of their design and the proposed construction works.

All U UW assets will need to be afforded due regard in the masterplanning process for a site. This should include careful consideration of landscaping and biodiversity proposals in the vicinity of our assets and any changes in levels and proposed crossing points (access points and services).

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. We ask site promoters to contact U UW to understand any implications using the below details:

Developer Services – Wastewater

Tel: 03456 723 723

Email: SewerAdoptions@uuplc.co.uk

Developer Services – Water

Tel: 0345 072 6067

Email: Watermains@uuplc.co.uk

Vision for Worsthorne and Hurstwood

U UW welcomes the vision for Worsthorne and Hurstwood, which includes clear reference to minimise the impact on the environment and limiting climate change. The need for any development to be responsive to the climate emergency to ensure resilient and adapted sustainable communities, which are attractive and well designed is essential. Sustainability and climate resilience should be ‘*golden threads*’ that guide the preparation of planning policy. A critical element of climate resilience is sustainable water management and water efficient development, which we have considered further below.

Objectives for Worsthorne and Hurstwood

Reflecting the above, U UW requests that the NP includes an additional objective which is:

- *To ensure that new development is responsive to the climate emergency through resilient and adaptable sustainable communities.*

Policy WHNP1C – Nature Recovery and Biodiversity Net Gain (BNG)

We are keen to ensure that BNG is delivered in the most appropriate locations and without restricting the potential future expansion and operation of key operational infrastructure which is often very geographically restricted and critical to meeting future growth and environmental drivers. We welcome flexibility within this policy to allow for off-site provision. This is particularly in respect of existing and new infrastructure sites. On-site provision may not be the most appropriate long-term solution for the delivery of BNG when investing in key infrastructure such as water and wastewater assets. BNG should be resilient to future pressures from further development. It is critical that land at and around our key infrastructure sites is not sterilised to ensure that we are able to flexibly and most appropriately respond to future growth and environmental drivers.

Policy WHNP2 – Worsthorne and Hurstwood Neighbourhood Design Guide

Sustainable Design – Sustainable Water Management

Within the Design Guide, we note that there is some helpful references to the sustainable management of water, which is a critical element of the response to climate change. Although we welcome these references, we recommend that the Design Guide expands on sustainable water management as set out below.

Water Efficiency

Building Regulations Part G includes an optional standard for water efficiency of 110 litres per person per day (l/p/d) 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 additional wording in the Design Guide regarding water efficiency.

‘All new residential developments must achieve, as a minimum, the optional requirement set through Building Regulations Requirement G2: Water Efficiency or any future updates.

We also suggest that wider non-residential development should also be the subject of water efficiency requirements as per the below recommended wording:

‘All major non-residential development shall incorporate water efficiency measures so that predicted per capita consumption does not exceed the levels set out in the applicable BREEAM ‘Excellent’ standard.’

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

Sustainable Drainage

We recommend the following wording for inclusion in the Design Guide.

‘Where required by the local planning authority, applications must be supported by a strategy for foul and surface water management. Surface water must be discharged in accordance with the surface water hierarchy in national planning practice guidance.

The design of proposals must assess and respond to the existing hydrological characteristics of a site to ensure a flood resilient design is achieved and water / flooding is not deflected or constricted.

Applications will be required to incorporate sustainable drainage which is proportionate to the nature and scale of the proposal. The sustainable drainage must be multi-functional wherever possible, and designed in accordance with the four pillars of sustainable drainage, in preference to underground piped and tanked storage systems, unless, there is clear evidence why such techniques are not possible. The sustainable drainage should be integrated with the landscaped environment and the strategy for biodiversity net gain.

Explanatory Text

Application of the hierarchy for managing surface water is a key requirement for all development sites to reduce flood risk and the impact on the environment. Clear evidence must be submitted to demonstrate why alternative preferable options in the surface water hierarchy are not available.

Foul and surface water drainage must be considered early in the design process. Sustainable drainage must be integrated with the landscaped environment and designed in accordance with the four pillars of sustainable drainage (water quantity, water quality, amenity and biodiversity). It should identify SuDS opportunities, such as green roofs; permeable surfacing; soakaways; filter drainage; swales; bioretention tree pits; rain gardens; basins; ponds; reedbeds and wetlands. Any drainage should be designed in accordance with 'Ciria C753 The SuDS Manual', sewerage sector guidance, or any subsequent replacement guidance.

The hydrological assessment of the site must consider site topography, naturally occurring flow paths, ephemeral watercourses and any low-lying areas where water naturally accumulates. Resultant layouts must take account of such circumstances. Applications will be required to consider exceedance / overland flow paths from existing and proposed drainage features and confirm ground levels, finished floor levels and drainage details. Drainage details, ground levels and finished floor levels are critical to ensure the proposal is resilient to flood risk and climate change. It is good practice to ensure the external levels fall away from the ground floor level of the proposed buildings (following any regrade), to allow for safe overland flow routes within the development and minimise any associated flood risk from overland flows. In addition, where the ground level of the site is below the ground level at the point where the drainage connects to the public sewer, care must be taken to ensure that the proposed development is not at an increased risk of sewer surcharge. It is good practice for the finished floor levels and manhole cover levels (including those that serve private drainage runs) to be higher than the manhole cover level at the point of connection to the receiving sewer.'

Groundwater Source Protection Zone and Public Water Supply Catchment Land

UUW wishes to highlight that large sections of the NP area are in a groundwater source protection zone and on land used for public water supply catchment purposes. These designations reflect the public water supply assets that are owned and operated by UUW within, and adjacent to, the area. We request that the Design Guide includes the following text:

In consultation with the Council and relevant statutory bodies, applicants must, where required, demonstrate no unacceptable impact on the water environment (including groundwater) and public water supply resources resulting from the design, construction and operation of proposed development. Where necessary, development proposals must include measures to protect the water environment and public water supply resources. Development proposals must accord with the latest national guidance on Groundwater Source Protection Zones.

Explanatory Text

The area of the Neighbourhood Plan is the location for public water supply catchment land and groundwater source protection zones. These are public water supply resources which must not be adversely affected by development proposals.

Investment in Future Infrastructure

In this investment period (2025-30), UUW is proposing the biggest investment in water and wastewater services across the North West in over 100 years. This is influenced by a number of drivers including the construction of new facilities to take account of new environmental requirements, growth, the need to respond to the carbon challenge, or the need to invest in new updated infrastructure.

The drivers for this investment include the Environment Act 2021, which has set a requirement to progressively reduce storm spills into the environment. To meet this obligation significant future investment in our wastewater assets (treatment and network) is required. Such investment will be constrained by engineering circumstances to determine the most appropriate location for additional storage to reduce spills. This may necessitate investment in constrained and protected locations in our urban and rural environments such as local green space, open countryside and green belt. Consistent with meeting its obligations, UUW requests that NP policy is worded to recognise that infrastructure improvements, located within protected land, are appropriate forms of development. We also request wider support for water and wastewater infrastructure investment that is ultimately beneficial to the environment, biodiversity, watercourses and facilitates identified growth so that our investment can be delivered in the most timely and effective manner.

UUW requests the support of all bodies for future investment in infrastructure in order to be able deliver water and wastewater infrastructure investment in a timely manner. UUW wishes to highlight that it owns assets which are currently situated in the NP area. Upgrades to these assets may be required in the future, and it is important to ensure that any required upgrades and expansions to these sites can be made in order for us to meet environmental drivers and the infrastructure requirements of proposed future development in the region.

The following policy wording is recommended:

‘The Neighbourhood Plan supports water and wastewater infrastructure investment which facilitates the delivery of wider sustainable development and the meeting of environmental objectives including development proposals for water and wastewater infrastructure in protected areas such as the Green Belt, open countryside or in existing green spaces, where the investment is needed to respond to future growth and environmental needs.’

This policy would enable us to ensure we can continue to meet the growth and development aspirations of the region, by ensuring that fundamental infrastructure requirements are met and that we are able to respond to the need for investment in our assets to protect the environment, maintain water supply and reduce flood risk.

Summary

If you have any queries or would like to discuss this representation, please do not hesitate to contact me at planning.liaison@uuplc.co.uk.

Yours faithfully

Andrew Leyssens MRTPI
Strategic Planning and Sustainability
United Utilities Water Limited

Enc. Water Resources West Evidence