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You're Ref – 4/26/2063/0F1
Date – 10th March 2026

TWIN ELMS, LOOP ROAD, DISTINGTON, CUMBRIA CA15 6LS
PROPOSED DEMOLITION OF EXISTING HOUSE & CONSTRUCTION OF NEW THREE
BEDROOM SELF BUILD DETACHED DORMER

1. Introduction

This note is submitted in response to the consultation comments provided by United Utilities dated 10 March 2026 in relation to the proposed demolition of the existing dwelling and construction of a replacement single-storey dwelling at Twin Elms, Distington.

The purpose of this note is to clarify the drainage strategy previously submitted and demonstrate that the proposed development fully satisfies the drainage hierarchy requirements set out within:

- National Planning Practice Guidance (Flood Risk and Coastal Change)
- Non-Statutory Technical Standards for Sustainable Drainage Systems (2015)
- Building Regulations Approved Document Part H.

2. Existing Drainage Situation

The site currently contains an existing residential dwelling which has historically discharged both foul and surface water to the existing combined sewer network serving Twin Elms.

The submitted drainage plan confirms the location of the existing connection point and demonstrates how the new development will utilise the same established drainage infrastructure.

The proposed development therefore represents a replacement dwelling on an established residential plot, rather than new development introducing additional drainage infrastructure to the wider sewer network.

Importantly, the proposed design introduces attenuation and flow restriction, meaning the new dwelling will reduce peak discharge rates when compared with the existing uncontrolled connection.

3. Drainage Hierarchy Assessment

In accordance with the National Planning Practice Guidance drainage hierarchy, the following options have been assessed.

3.1 Infiltration Drainage (Soakaways)

The site is underlain by heavy clay subsoils typical of this area of West Cumbria.

Trial investigations and infiltration testing undertaken on site confirmed that the ground conditions do not permit effective infiltration, with percolation rates failing to achieve acceptable BRE365 infiltration values.

Due to the impermeable clay strata present, infiltration drainage such as soakaways is therefore **not technically feasible at this location.**

Infiltration has therefore been discounted in accordance with the drainage hierarchy.

3.2 Discharge to Watercourse

There are no watercourses present within or adjacent to the site which could provide a suitable receiving body for surface water discharge.

This option is therefore not viable.

3.3 Surface Water Sewer

There is no separate surface water sewer network available within the vicinity of the site. Accordingly, discharge to a dedicated surface water sewer cannot be achieved.

3.4 Combined Sewer (Existing Connection)

The existing dwelling at Twin Elms currently drains to the combined sewer network serving the surrounding residential properties.

The proposed development will utilise the same established connection point. However, unlike the existing dwelling, the proposed scheme incorporates attenuation storage and a hydrobrake flow control device restricting discharge to 5 litres per second.

This represents a betterment to the existing drainage arrangement, as peak flows entering the sewer network will be controlled and reduced.

4. Proposed Surface Water Strategy

Surface water from the roof areas will be directed to a geocellular attenuation tank system with a design storage volume of approximately 6.8 m³.

The system will:

- Attenuate runoff during storm events
- Restrict discharge to 5 litres per second via a hydrobrake flow control device
- Discharge to the existing combined sewer connection

This approach aligns with SuDS principles by managing runoff on site and limiting discharge rates, the proposed attenuation system will therefore ensure the development does not increase flood risk elsewhere.

5. Foul Drainage

Foul water from the proposed dwelling will discharge via a separate foul drainage system before connecting to the existing combined sewer network.

This arrangement ensures foul and surface water drainage are separated within the site layout, in accordance with Building Regulations Approved Document Part H.

6. Drainage Levels

The drainage system has been designed with reference to the following levels:
Proposed Finished Floor Level (FFL): 10.000m to mirror the existing floor level.

Drainage invert levels and chamber locations are shown on Drawing TE-SB-004
The proposed drainage layout ensures adequate falls and provides suitable separation between finished floor levels and the drainage infrastructure (see below)

| Drainage Pipes to be 100mm Plastic Pipe Laid in accordance with Approved Document Part H (Assume FFL = 10.000) | | | | |
|--|--------------|-------------|-----------|-------|
| Surface Water Drainage | | | | |
| Chamber Name | Invert Level | Cover Level | Distance | Fall |
| S1 | 8.950 | 9.850 | 1,400mm | 1/29 |
| S2 | 9.000 | 9.850 | 9,000 mm | 1/180 |
| S3 | 9.200 | 9.850 | 13,000 mm | 1/65 |
| S4 | 9.200 | 9.850 | 16,400 mm | 1/82 |
| Foul Water Drainage | | | | |
| Chamber Name | Invert Level | Cover Level | Distance | Fall |
| F1 | 8.900 | 9.850 | - | - |
| F2 | 9.100 | 9.850 | 9,000 mm | 1/45 |
| F3 | 9.450 | 9.850 | 12,300 mm | 1/35 |
| F4 | 8.350 | 9.850 | 17,400 mm | 1/70 |
| F5 | 9.450 | 9.850 | 7,800 mm | 1/78 |

7. Betterment to Existing Situation

It is important to note that the proposal replaces an existing dwelling that historically discharged directly to the combined sewer without any attenuation.

The proposed development introduces:

- Surface water attenuation
- Controlled discharge via hydrobrake
- Improved drainage design in accordance with modern standards.

As such, the proposal represents an improvement to the existing drainage arrangements on the site.

8. Conclusion

The drainage strategy for the proposed development has been designed in accordance with national drainage guidance and demonstrates full compliance with the drainage hierarchy. The assessment confirms that:

- Infiltration drainage is not feasible due to clay ground conditions
- No watercourse is available for discharge
- No separate surface water sewer is available
- The existing combined sewer connection is therefore the only viable receiving system.

The proposed scheme incorporates attenuation and restricted discharge, ensuring the development will not increase flood risk and will improve the existing drainage arrangement.

On this basis, it is respectfully submitted that the drainage strategy is appropriate and the consultation comments from United Utilities can be addressed through the information provided above.

Kind regards

D Sowerby



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Planning.Liaison@uuplc.co.uk

Cumberland Council
Copeland
By email

Your ref 4/26/2063/0F1
Our ref DC/26/576
Date 10-MAR-26

Dear Planning Team

Location: TWIN ELMS, LOOP ROAD, DISTINGTON
Proposal: PROPOSED DEMOLITION OF EXISTING HOUSE & CONSTRUCTION OF NEW THREE BEDROOM SELF BUILD DETACHED DORMER

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 documents; Drainage Strategy Ref: TE-SB-004, Dated 31/01/2026, the drainage proposals are not acceptable to United Utilities. This is because we have not seen robust evidence that the drainage hierarchy has been thoroughly investigated and the proposals are not in line with the National Standards for Sustainable Drainage Systems (2025). In addition, we require for the applicant to submit the detail of the proposed finished floor levels on the drainage design.

Should planning permission be granted we request the following condition is attached to any subsequent Decision Notice:

CONDITION

Prior to the commencement of development, details of a sustainable surface water drainage scheme and a foul water drainage scheme shall be submitted to and approved in writing by the Local Planning Authority. The drainage schemes must include:

- (i) An investigation of the hierarchy of drainage options in the National Planning Practice Guidance (or any subsequent amendment thereof). This investigation shall include evidence of an assessment of ground conditions and the potential for infiltration of surface water in accordance with BRE365;*

- (ii) A restricted rate of discharge of surface water agreed with the local planning authority (if it is agreed that infiltration is discounted by the investigations);*
- (iii) Levels of the proposed drainage systems including proposed ground and finished floor levels in AOD;*
- (iv) Incorporate mitigation measures to manage the risk of sewer surcharge where applicable; and*
- (v) Foul and surface water shall drain on separate systems.*

The approved schemes shall also be in accordance with the Non-Statutory Technical Standards for Sustainable Drainage Systems (March 2015) or any subsequent replacement national standards.

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 promote sustainable development, secure proper drainage and to manage the risk of flooding and pollution.

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'

Public sewer

A public sewer crosses the site and we will not permit building over it. We require an access strip for maintenance or replacement and this access must not be compromised in any way. The minimum distances that might be acceptable to United Utilities are detailed within Part H of the Building Regulations however, we recommend the applicant determines the precise location, size, depth and condition of the pipeline as this is likely to influence the required stand-off distance from any structure.

Based on the information currently available, it is unclear whether sufficient distance is provided between proposed development features and our wastewater asset(s). We recommend the applicant contacts our Developer Services team to ensure existing wastewater assets, along with our required access widths, can be accommodated in the proposed layout. If the applicant fails to investigate and resolve any concerns prior to a positive determination, there is a risk that as the scheme progresses, the applicant, or any subsequent developer, may discover that their plans are not implementable in their existing form or that diversion of assets is required.

If the Local Authority requires any additional comment on the acceptability of the proposed layout from United Utilities, we will require a detailed site layout plan, which overlays the PROVEN location of the wastewater asset(s) in relation to any proposed development (including walls, fencing, parking etc.). In this scenario, we will require evidence to show that the location of the pipeline(s) has been confirmed by site specific survey, a copy of asset maps will not suffice.

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

APPENDIX:

Supporting information for the decision maker, applicant, developers and any other interested party

Whilst we provide the following information to support the design and delivery of the proposed scheme, we strongly recommend that the applicant, or any subsequent developer, contacts our Developer Services team at the earliest opportunity, using our [pre-development enquiry service](#), to ensure they have fully considered all aspects of development and to avoid any potential issues or unexpected costs at a later date.

Full details of the services offered to developers, guidance and application forms are available on our website: [Building & Developing - United Utilities](#)

1.0 DRAINAGE DESIGN

1.1 The importance of sustainable drainage systems

We strongly encourage all developments to include sustainable drainage systems to help manage surface water and to offer new opportunities for wildlife to flourish. We request that Local Planning Authorities and applicants do all they can to avoid surface water entering the public sewer. The flows that come from this surface water are very large when compared with the foul water that comes from toilets, showers, baths, washing machines, etc. It is the surface water that uses up a lot of capacity in our sewers and results in the unnecessary pumping and treatment of surface water at our pumping stations and treatment works. If new developments can manage flows through sustainable drainage systems that discharge to an alternative to the public sewer, it will help to minimise the likelihood of sewers spilling into watercourses and the flooding of homes and businesses.

1.2 Adoption and construction of drainage systems

If the applicant intends to offer wastewater assets forward for adoption by United Utilities, their proposed detailed design will be subject to a technical appraisal by our Developer Services team and must meet the requirements outlined in 'Sewerage Sector Guidance Appendix C – Design and Construction Guidance v2-2' dated 29 June 2022 or any subsequent iteration. This is important as drainage design can be a key determining factor of site levels and layout.

If the proposal incorporates a SuDS component(s) which interacts with a sewer network that may be offered for adoption by United Utilities, we recommend the applicant seeks further advice regarding the SuDS design; detailed information is available on our website.

Our acceptance of any drainage strategy submitted by an applicant to the Local Planning Authority for approval does not infer that a detailed drainage design will meet the requirements for a successful adoption application. We strongly recommend that no construction commences until the detailed drainage design has been submitted directly to United Utilities, assessed and accepted in writing. Any work carried out prior to the technical assessment being approved is done entirely at the developer's own risk and could be subject to change.

2.0 UNITED UTILITIES' PROPERTY, ASSETS AND INFRASTRUCTURE

2.1 Water pipelines

United Utilities will not allow building over or in close proximity to a water main.

For any works in the vicinity of water pipelines, including drainage, the applicant must comply with our 'Standard Conditions for Works Adjacent to Pipelines', which can be found on our website: [Working near our pipes - United Utilities](#)

2.2 Wastewater pipelines

United Utilities 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. *Nb. Proposals to extend domestic properties either above, or in close proximity to a public sewer will be reviewed on a case by case basis by either by a building control professional or following a direct application to United Utilities (see our website for further details).*

2.3 Water and wastewater pipelines and apparatus

A number of providers offer a paid for mapping service, including United Utilities (see Section 4.0 'Contacts' (below)). The position of the underground apparatus shown on water and wastewater asset maps is approximate only and is given in accordance with the best information currently available. Therefore, we strongly recommend the applicant, or any future developer, does not rely solely on the asset maps to inform decisions relating to the detail of their site and instead investigates the precise location of any underground pipelines and apparatus. Where additional information is requested to enable an assessment of the proximity of proposed development features to United Utilities assets, the proven location of pipelines should be confirmed by site survey; an extract of asset maps will not suffice. The applicant should seek advice from our Developer Services team on this matter. See Section 4.0. 'Contacts' (below). United Utilities Water will not accept liability for any loss or damage caused by the actual position of our assets and infrastructure being different from those shown on asset maps.

Developers should investigate the existence and the precise location of water and wastewater pipelines as soon as possible as this could significantly impact the preferred site layout and/or diversion of the asset(s) may be required. Unless there is specific provision within the title of the property or an associated easement, any necessary disconnection or diversion of assets to accommodate development, will be at the applicant/developer's expense. In some circumstances, usually related to the size and nature of the assets impacted by proposals, developers may discover the cost of diversion is prohibitive in the context of their development scheme.

Any agreement to divert our underground assets will be subject to a diversion application, made directly to United Utilities. This is a separate matter to the determination of a planning application. We will not guarantee, or infer acceptance of, a proposed diversion through the planning process (where diversion is indicated on submitted plans). In the event that an application to divert or abandon underground assets is submitted to United Utilities and subsequently rejected (either before or after the determination of a planning application),

applicants should be aware that they may need to amend their proposed layout to accommodate United Utilities' assets.

Where United Utilities' assets exist, the level of cover to United Utilities pipelines and apparatus must not be compromised either during or after construction and there should be no additional load bearing capacity on pipelines without prior agreement from United Utilities. This would include sustainable drainage features, earth movement and the transport and position of construction equipment and vehicles.

Any construction activities in the vicinity of United Utilities' assets, including any assets or infrastructure that may be located outside the applicant's red line boundary, must comply with national building and construction standards and where applicable, our 'Standard Conditions for Works Adjacent to Pipelines', which can be found on our website: [Working near our pipes - United Utilities](#)

The applicant, and/or any subsequent developer should note that our 'Standard Conditions' guidance applies to any design and construction activities in close proximity to water pipelines and apparatus that are no longer in service, as well as pipelines and apparatus that are currently in operation.

It is the applicant's responsibility to ensure that United Utilities' required access is provided within any proposed layout and that our infrastructure is appropriately protected. The developer would be liable for the cost of any damage to United Utilities' assets resulting from their activity.

3.0 WATER AND WASTEWATER SERVICES, METERING AND CHARGES

If the applicant intends to receive water and/or wastewater services from United Utilities they should visit our website or contact the Developer Services team for advice at the earliest opportunity. This includes seeking confirmation of the required metering arrangements for the proposed development. See Section 4.0 'Contacts' (below).

If the proposed development site benefits from existing water and wastewater connections, the applicant should not assume that the connection(s) will be suitable for the new proposal or that any existing metering arrangements will suffice. In addition, if reinforcement of the water network is required to meet potential demand, this could be a significant project and the design and construction period should be accounted for.

In some circumstances a water meter must be installed to premises. Detailed guidance on whether the development will require a compulsory meter is available on our website within our published Charges Schemes; [Our charges 2024/25 | United Utilities](#) (Section 8.7).

To avoid any unnecessary costs and delays being incurred by the applicant or any subsequent developer, we strongly recommend the applicant seeks advice regarding water and wastewater services and metering arrangements, at the earliest opportunity. See Section 4.0 'Contacts' (below).

To promote sustainable development United Utilities offers a reduction in infrastructure charges to applicant's delivering water efficient homes and draining surface water sustainably (criteria applies). Further information can be found on our website: [Sustainability - United Utilities](#)

Business customers can find additional information on our sustainable drainage incentive scheme at [Incentive schemes | United Utilities](#)

4.0 CONTACTS

For advice on your development contact our DEVELOPER SERVICES team as follows:

Website (including 'Live Chat'): [Building & Developing - United Utilities](#)

Email:

| | |
|---|--|
| WATER (water mains, supply and metering): | DeveloperServicesWater@uuplc.co.uk |
| WASTEWATER (public sewers and drainage): | SewerAdoptions@uuplc.co.uk |
| SLUDGE PIPELINES: | DeveloperServicesWater@uuplc.co.uk |

Telephone (Monday-Friday, 8am-6pm): 0345 072 6067

PROPERTY SEARCHES (FOR ASSET MAPS):

A number of providers offer a paid for mapping service including United Utilities. For more information, or to purchase a sewer and water plan from United Utilities, please visit [Property Searches | United Utilities](#)

Water and sewer records can be viewed for free at our Warrington Head Office by calling 0370 751 0101. Appointments must be made in advance. Public sewer records can be viewed at local authority offices. Arrangements should be made directly with the local authority.

UNITED UTILITIES LEGAL SERVICES (FOR EASEMENT DOCUMENTS):

Copies of relevant deeds may be purchased from United Utilities Legal Services. This information is also available from Land Registry.

To purchase a copy of easement documents from United Utilities, please email: LegalServices@uuplc.co.uk

