

United Utilities Water Limited

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By email only: bootleaap@sefton.gov.uk

Planning Department Sefton Council Ground Floor Magdalen House Trinity Road Bootle L20 3NJ Your ref: Our ref:

Date: 12-NOV-24

Dear Sir / Madam

OUR FUTURE, OUR BOOTLE -BOOTLE AREA ACTION PLAN PUBLICATION (REGULATION 19) DRAFT (JULY 2024)

Thank you for your consultation seeking the views of United Utilities Water Limited (UUW) as part of the Draft Bootle Area Action Plan ('the AAP'). UUW wishes to build a strong partnership with all local planning authorities (LPAs) to aid sustainable development and growth within its area of operation. We aim to proactively identify future development needs and share our information. This helps:

- ensure a strong connection between development and infrastructure planning;
- deliver sound planning strategies; and
- inform our future infrastructure investment submissions for determination by our regulator.

UUW wishes to highlight the benefit of early, constructive communication with the council and site promoters to ensure a co-ordinated approach to the delivery of any future allocations. We will seek to work closely with the council during the local plan process to develop a coordinated approach to delivering sustainable growth in sustainable locations.

When preparing the AAP and future policies, new development should be focused in sustainable locations which are accessible to local services and infrastructure. We can most appropriately manage the impact of development on our infrastructure if development is identified in locations where infrastructure is available with existing capacity.

We note that the AAP includes a number of allocations. As noted in our submission in November 2023, we would be grateful if you can provide GIS shp files for these locations so that the allocations can be assessed in more detail including any change in boundaries to the adopted borough wide development plan.

Site-Specific Policies

UUW notes that a number of your proposed allocations are not guided by site-specific policies. UUW strongly encourages the council to include detailed site-specific policy that governs the

allocation of any site so that key development considerations can be explicitly referenced in the policy. We believe that clearer requirements help to achieve more sustainable development. In relation to those locations that are proposed to be the subject of a masterplan, UUW requests the opportunity to engage with the council in the preparation of such masterplans.

Our Assets

It is important to outline the need for our assets to be fully considered in any proposals you bring forward. We can advise you on this further when you provide us with the relevant GIS shp files. At this stage we can confirm that there are a number of allocations, which have significant assets that pass through them which would be material to site design.

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

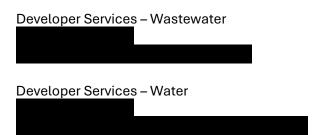
UUW will not allow a new building to be erected over or in close proximity to a public sewer or any other wastewater pipeline. This will only be reviewed in exceptional circumstances.

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

On occasion, an asset protection matter within a site can preclude the delivery of development.

As you would expect, there are a range water and wastewater assets through, and within the vicinity of, the proposed allocations. It is critical that site promoters engage with UUW on the detail of their design and the proposed construction works. All UUW 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 which will need to be agreed in writing. The details of any services, access or roads (temporary or permanent) that are proposed in the easement / offset area for our assets must also be agreed.

We strongly recommend that the LPA advises future applicants 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 and agreed. We ask site promoters to contact UUW to understand any implications by contacting:



Co-ordinated Infrastructure Provision

We wish to note that any growth needs to be carefully planned to ensure new infrastructure provision does not cause any unexpected delays to development delivery. The full detail of the development proposals are not yet known. For example, the detail of the drainage proposals, the points of connection or the water supply requirements. As a result, it is important that we highlight that in the absence of such detail, we cannot fully conclude the impact on our infrastructure and therefore as more detail becomes available, it may be necessary to co-ordinate the timing for the

delivery of development with the timing for delivery of infrastructure. We continue to recommend that you include a development management policy in your draft AAP to this effect. Our recommended policy is below.

'Once more details are known on development sites, it may be necessary to coordinate the delivery of development with timing for the delivery of infrastructure improvements.'

Sites in Multiple Ownerships

UUW has concerns regarding any site allocations, which are in multiple land ownerships. The experience of UUW is that where sites are in multiple ownership, the achievement of sustainable development can be compromised by developers/applicants working independently. We therefore encourage you to make early contact with all landowners/site promoters and challenge those landowners on how they intend to work together, preferably as part of a legally binding delivery framework and / or masterplan. We believe that raising this point is in the best interest of delivering regeneration and achieving challenging delivery targets from allocated sites in the most sustainable and co-ordinated manner.

We continue to recommend that future policy requires applicants to provide drainage strategies for foul and surface water. We recommend that policy requires the preparation of an infrastructure phasing and delivery strategy. We recommend that early consideration is given to the infrastructure strategy as part of the preparation of the local plan and to ensure a co-ordinated approach to the delivery of new development and infrastructure in the areas that you have identified for development. We would recommend the following policy is considered for inclusion in the AAP:

'Where applications are submitted on land which is part of a wider allocation / development, applicants will be expected to submit allocation/development wide infrastructure strategies to demonstrate how the site will be brought forward in a co-ordinated manner. The strategies shall be prepared in liaison with infrastructure providers and demonstrate how each phase interacts with other phases and ensure coordination between phases of the development over lengthy time periods and by numerous developers. Where necessary, the strategy must be updated to reflect any changing circumstances between phase(s) during the delivery of the development.'

Climate Change

UUW notes the proposed 'Vision' in the AAP. We welcome the reference to climate change within the vision as a key challenge to be addressed. We also welcome the amendment to Objective 13 of the AAP which refers to the need to set standards in new development that help the Council respond to the challenge of climate change. The policies of the AAP should require new development to be designed so that it is resilient to the challenges of climate change including the role of green and blue infrastructure, natural flood management techniques, avoiding flood risk locations, multifunctional sustainable drainage, and the incorporation of water supply efficiency measures.

As the LPA will be aware, green infrastructure can help to mitigate the impacts of high temperatures, combat emissions, maintain or enhance biodiversity and reduce flood risk. Green / blue infrastructure and landscape provision play an important role in managing water close to its source. If the necessary link between green/blue infrastructure, surface water management and landscape design is outlined as a strategic requirement, it will help ensure that sustainable surface water management is at the forefront of the design process.

BAAP1 Design

We welcome Policy BAAP1 however, we request that this expands on the requirements for sustainable drainage (foul and surface water) which should be intrinsically linked to the proposals for landscaping.

Sustainable Drainage (Foul Water and Surface Water) and Landscaping

New development should manage foul and surface water in a sustainable way in accordance with national planning policy. The sustainable management of surface water is extremely important given the need to reduce the discharge of combined sewer overflows. Paragraph 2.25 of the AAP explains that:

'While there may be some infiltration of surface water, Bootle has no watercourses or surface water bodies other than the canal. As a result, almost all surface water discharges to combined sewers or flows out in Combined Sewer Overflows during times of flooding.'

Alongside the reduction in discharges from the public combined sewer, the sustainable management of surface water has the added benefit of reducing flood risk. We wish to emphasise the importance of any policy, including site-specific policy, identifying requirements for the sustainable management of surface water. This includes setting out the need to follow the hierarchy of drainage options for surface water in national planning practice guidance, which clearly identifies the public combined sewer as the least preferable option for the discharge of surface water. Given the limited availability of alternatives to the public combined sewer, it is also imperative that new development seeks to slow the flow of surface water by ensuring that every effort is made to priorities multi-functional SuDS. Slowing the flow will make Bootle more resilient to the challenges of climate change by reducing flood risk and the likelihood of the combined sewer spilling into water bodies.

The evaluation of surface water management opportunities should be undertaken early in the design process. It is imperative that the approach to design, including site analysis, is intrinsically linked to making space for water. Sustainable surface water management will be particularly important to consider in the context of the requirement for new streets to be tree lined. It is a national policy requirement that new streets are tree lined as stated in paragraph 136 within the NPPF. Public realm improvements will be brought forward as part of the regeneration proposals in Bootle and these represent an excellent opportunity to improve surface water management. However, there is currently limited information in policy within the AAP which drives the integration of sustainable drainage with landscaping proposals and proposals for the public realm.

UUW requests that you consider how any proposals for the public realm / landscaping that is to be created on the proposed allocations can be linked to opportunities for surface water management. We request that any landscaping and public realm improvements evaluate opportunities for surface water management to include opportunities for source control and slowing the flow of surface water through the incorporation of blue and green Infrastructure. It is preferable that the evaluation of surface water and flood risk management opportunities are undertaken at the outset of the design process. Such an approach has added benefits associated with the quality of the public realm, the enhancement of biodiversity and urban cooling.

As outlined in 'Building for a Healthy Life', we request that landscaping proposals are linked to the proposals for surface water management in accordance with the 'four pillars' of sustainable drainage systems, i.e., water quantity, water quality, amenity and biodiversity. National policy is

clear that priority should be given to multi-functional SuDS over traditional underground, tanked and piped storage systems. Sustainable water management, especially in the form of multi-functional SuDS, helps us adapt and respond to the challenges posed by climate change and the impact of urbanising our environment. SuDS also have wider benefits and represent an opportunity to improve the quality of urban environments by changing 'grey' to 'green and blue'. They can help to create more attractive and usable spaces which help with social cohesion by connecting people, improving amenity and wellbeing, and offering opportunities for nature. In our urban environments there are often areas that can be better used to manage rainfall runoff through surface levels SuDS which can transform grey and impermeable spaces to greener, more attractive and resilient spaces appreciated by the community.

Policy should require the design of sites to be intrinsically linked to opportunities for surface water management improvements and should ensure that opportunities for source control, slowing the flow and filtration of surface water are considered early in the design process. This could be achieved through a variety of features including:

- permeable surfacing;
- bio retention tree pits and bio retention landscaping;
- rain gardens;
- soakaways and filter drainage;
- · retrofitted swales; and
- blue/green roofs.

We recommend that you refer to the Susdrain website which includes a range of <u>case studies</u> that show examples of how SuDS have been implemented in the urban environment. We also request that you also consider the resilience of any planting to drought. We request that you include site-specific policies regarding the approach to drainage when allocating a site, preferably informed by a flood risk assessment / drainage strategy. We request that your site-specific policy clearly states that applicants must make space available in their proposals for multi-functional sustainable drainage. Therefore, UUW recommends the following wording for inclusion within the AAP:

'All applications must be supported by a strategy for foul and sustainable surface water management. The surface water strategy must be in accordance with the surface water hierarchy and must prioritise multi-functional SuDS. Applicants must identify land that ensures the delivery of multi-functional sustainable drainage in accordance with the four pillars of sustainable drainage which is integrated with the landscaped environment.

Landscaping and public realm proposals, including proposals for tree-lined streets, must be integrated with the strategy for sustainable surface water management. This could be achieved through a variety of features including:

- permeable surfacing;
- bio retention tree pits and bio retention landscaping;
- rain gardens;
- soakaways and filter drainage;
- retrofitted swales; and
- blue/green roofs.'

We believe that adding this clarity to policy, especially site-specific policy, helps to remove uncertainty. This clarity is critical to avoid regulatory / policy uncertainty and ensure a level playing to developers operating in a competitive setting when acquiring a site (see Sustainable drainage and new housing developments, Payne, Walker, Illman and Sharp, 2023). We strongly recommend that policy and design guidance clearly identifies the need for major developments to make space for multi-functional sustainable drainage systems. As evidenced in the aforementioned research, clarity of policy requirements will help to secure better sustainable drainage results in the final design of the development. We believe that adding this clarity to site-specific policy helps to remove uncertainty, which in turn helps to contribute to a level playing field during the land acquisition process.

Any approach to planting new trees must give due consideration to the impact on utility services noting the implications that can arise because of planting too close to utility services. This can result in root ingress, which in turn increases the risk of drainage system failure and increases flood risk. It will be important that applicants refer to our 'Standard Conditions for Works Adjacent to Pipelines' (a copy of which can be found on our website) and consult with us when implementing the delivery of landscaping proposals. The approach to any planting must have regard to the proximity to existing or proposed utility assets to ensure there is no impact on these assets such as root ingress. Trees should not be planted directly over water and wastewater assets or where excavation onto the asset would require removal of the tree.

Sewer Flood Risk

When considering flood risk policy and the location of development, we believe it is important to highlight that the preparation of the AAP should give sufficient emphasis to all forms of flood risk. When considering potential new development sites, it is important to identify where there are existing public sewers within or near to the site, which are predicted to be at risk from flooding and/or sites where there is a record of previous flooding from the public sewer. Proposals could also be affected by overland flows from nearby off-site public sewers. Policy should be clear that existing flood risk must not be displaced and that any flood risk needs to be considered early in the design process. This can be better understood once more details become available on specific sites, for example, topographic information, which will inform where exceedance paths flow.

Table 1 within the Appendix to this letter sets out sites where an on-site modelled sewer flood risk has been identified. Whilst the strong preference of UUW is for development to take place outside of any identified flood risk in accordance with the sequential approach, we recognise the need to regenerate these sites and therefore we request that you include policy for each site within Table 1 using the following wording. This could be included as additional site-specific policy or as an amendment to existing draft policy, e.g., Policy BAAP1.

'Modelled Sewer Flood Risk

Existing public sewers pass through and near to this site which modelling data (and / or flooding incident data) identifies as being at risk of sewer flooding. This will need careful assessment and consideration in the detailed design, masterplanning and drainage details for the site. The risk of sewer flooding could affect the developable area of the site and the detail of the design.'

Table 2 within the Appendix to this letter sets out sites where there is a record of flooding on site / in the vicinity. Where there is a record of flooding on-site, or in the vicinity of the site, we would

recommend the following wording. This could be included as additional site-specific policy or as an amendment to existing draft policy, e.g., Policy BAAP1

'Sewer Flooding Incidents

There are flood incidents from the public sewer on-site / in the wider area. Applicants must engage with United Utilities to consider the detailed design of the site and drainage details. The risk of sewer flooding could affect the developable area of the site and the detail of the design.'

We also recommend the following explanatory text in respect of sewer flood risk matters:

'Explanatory Text

A range of sites have been identified as at risk of sewer flooding or in the wider vicinity of sewer flooding. In respect of these sites, the applicant must engage with United Utilities prior to any masterplanning to assess the flood risk and 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. Applicants must demonstrate that the proposed development would be safe and not lead to increased flood risk. Applicants should not assume that changes in levels or changes to the public sewer, including diversion, will be acceptable as such proposals could increase / displace flood risk. It may be necessary to apply the sequential approach and incorporate mitigating measures subject to the detail of the development proposal. Careful consideration will need to be given to the approach to drainage including the management of surface water; the point of connection; whether the proposal will be gravity or pumped; the proposed finished floor and ground levels; the management of exceedance paths from existing and proposed drainage systems and any appropriate mitigating measures to manage any risk of sewer surcharge.'

It is important that the above flood risks are referenced in an update to your Strategic Flood Risk Assessment and fully understood as part of any development at the site. This reflects the Planning Practice Guidance. See Paragraph: 004 Reference ID: 7-004-20220825 where applicants and planning authorities are advised to refer to Strategic Flood Risk Assessments to identify opportunities to control the risk of flooding. We recommend that any flood risk is better understood as soon as possible so that the impact on any development proposals can be confirmed.

BAAP2 Best Use of Resources

A tighter water efficiency standard in new development has multiple benefits including a reduction in water and energy use, as well as helping to reduce customer bills. Water efficiency is a key component of your journey to net zero. Evidence confirms that the optional standard for water efficiency can be achieved at no cost for new residential development (See table 3 of 'Water Ready: A report to inform HM Government's roadmap for water efficient new homes (April 2024)'). To promote sustainable development UUW offers a reduction in infrastructure charges to applicant's delivering water efficient homes and draining surface water sustainably (criteria apply). Further details can be found here.

UUW supports the principle of criterion 2 of Policy BAAP2 which states:

'2. All new build housing developments should aim to be water efficient by seeking to encourage water consumption to fewer than 110 litres per person per day.'

Whilst supporting the principle of this criterion, we are concerned that the aspirational nature of the wording which states 'should aim'. Noting that there is no additional cost associated with the implementation of the optional standard for water efficiency, we strongly recommend that criterion 2 is amended so that new development is required to achieve the tighter standard for water efficiency. Our amended wording is as follows.

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

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' / 'Very good' standard.'

This recommended wording will also ensure that the policy is reflective of any future change to the optional standard. It also ensures that there is a water efficiency requirement for non-residential proposals.

We also recommend that paragraph 5.22, which relates to water efficiency, cross refers to page 78 of the Revised Draft Water Resources Management Plan 2024 for UUW which can be found here. This states:

'Based on our commitments to reduce demand for water, to support water resources resilience and reduce our impact on the environment, we are requesting that all local authorities in our supply area adopt the optional minimum building standard of 110 litres per person per day (lppd) in all new builds.'

BAAP4 Bootle Town Centre (Strand Shopping Centre)

In accordance with the enclosed Tables 1 and 2, we request that the site-specific policy for BAAP4 refers to sewer flood risk using the wording recommended under the heading of Sewer Flood Risk above.

We request that policy outlines clear requirements for drainage in accordance with the policy wording which we have recommended under the heading of Sustainable Drainage (Foul Water and Surface Water) and Landscaping.

In this regard, the opportunity to discharge to an alternative body to the public combined sewer must be considered early in the design process. In particular, the option presented by the adjacent Leeds Liverpool Canal should be explored. We recommend that the sustainable drainage strategy for the site is given early consideration as part of the development of any masterplan for the site. Therefore early engagement with the Canals and Rivers Trust is required. As noted above, new landscaping will have a critical role to play in the management of surface water.

There are some significant assets that pass through the Strand Shopping Centre. Applicants must not assume that these can be diverted or built over. Early engagement with UUW on these assets must occur so that the implications for development and construction can be understood.

BAAP5 Bootle Office Quarter

In accordance with the enclosed Tables 1 and 2, we request that the site-specific policy for BAAP5 refers to sewer flood risk using the wording recommended under the heading of Sewer Flood Risk above.

We request that policy outlines clear requirements for drainage in accordance with the policy wording which we have recommended under the heading of Sustainable Drainage (Foul Water and Surface Water) and Landscaping.

There are some significant assets that pass through this area. Applicants must not assume that these can be diverted or built over. Early engagement with UUW on these assets must occur so that the implications for development and construction can be understood.

BAAP6 Civic and Education Quarter

We request that policy outlines clear requirements for drainage in accordance with the policy wording which we have recommended under the heading of Sustainable Drainage (Foul Water and Surface Water) and Landscaping.

In accordance with the enclosed Tables 1 and 2, we request that the site-specific policy for BAAP6 refers to sewer flood risk using the wording recommended under the heading of Sewer Flood Risk above.

There are some significant assets that pass through this area. Applicants must not assume that these can be diverted or built over. Early engagement with UUW on these assets must occur so that the implications for development and construction can be understood.

BAAP 12 Employment Land Provision

We request that these allocations are supported by site-specific policy which outlines clear requirements for drainage in accordance with the policy wording which we have recommended under the heading of Sustainable Drainage (Foul Water and Surface Water) and Landscaping.

In accordance with the enclosed Tables 1 and 2, we request site-specific policies for BE1, BE2, BE3, BE5, BE7, BE8 and BE9, which specifically refer to the sewer flood risk using the wording recommended under the heading of Sewer Flood Risk above.

There are some significant assets that pass through the employment land allocations. Applicants must not assume that these can be diverted or built over. Early engagement with UUW on these assets must occur so that the implications for development and construction can be understood.

BAAP 16 Housing Land Provision

We request that these allocations are supported by site-specific policy which outlines clear requirements for drainage in accordance with the policy wording which we have recommended under the heading of Sustainable Drainage (Foul Water and Surface Water) and Landscaping.

In accordance with the enclosed Tables 1 and 2, we request a site-specific policy for BH1 specifically refers to on-site sewer flood risk using the wording recommended under the heading of Sewer Flood Risk.

There are some significant assets that pass through the housing land allocations. Applicants must not assume that these can be diverted or built over. Early engagement with UUW on these assets must occur so that the implications for development and construction can be understood.

BAAP20 Hawthorne Road/Canal Corridor

We request that any proposals for this area are underpinned by a sustainable foul and surface water management strategy. We request that policy outlines clear requirements for drainage in accordance with the policy wording which we have recommended under the heading of Sustainable Drainage (Foul Water and Surface Water) and Landscaping.

The opportunity to discharge to an alternative body to the public combined sewer must be considered early in the design process. In particular, the option presented by the adjacent Leeds Liverpool Canal should be explored. We recommend that the sustainable drainage strategy for the site is given early consideration as part of the development of any masterplan for the site. Early engagement with the Canals and Rivers Trust is required. New landscaping will have a critical role to play in the management of surface water at the site as a result of any development proposals.

In accordance with the enclosed Tables 1 and 2, we request a site-specific policy for BAAP21 specifically refers to on-site sewer flood risk using the wording recommended under the heading of Sewer Flood Risk.

There are some significant assets that pass through the area. Applicants must not assume that these can be diverted or built over. Early engagement with UUW on these assets must occur so that the implications for development and construction can be understood.

Development near to Wastewater Treatment Works and Pumping Stations

At the current time, we have not identified any issues associated with the proximity to our wastewater assets. That said, we would wish to confirm the position relating to any wastewater assets and any associated proximity concerns once we have had an opportunity to review the allocations based on the aforementioned GIS shp files which we have requested.

- Wastewater assets such as treatment works and pumping stations are key infrastructure
 for the borough which may need to expand in the future to meet growth needs or respond
 to new environmental drivers. Maintaining a space around a treatment works is therefore
 desirable to respond to any future investment requirements.
- As a waste management facility, a wastewater pumping station / treatment works is an
 industrial operation which can result in emissions. These emissions include odour and
 noise. A wastewater treatment works can also attract flies. A wastewater treatment
 works is also subject to vehicle movements from large tankers which need to access the
 site.

The position of UUW is that when considering a range of sites to meet development needs, it is more appropriate to identify new development sites, especially sensitive uses, which are not close to a wastewater treatment works / pumping station. This position is in line with the 'agent of change' principle set out at paragraph 193 of the NPPF. Importantly, sensitive uses are not restricted to residential. They can include a range of other uses such as offices, schools and retail.

In this context we wish to note the 3rd bullet point of Policy BAAP14. We request that this is amended to be less prescriptive. The nature of uses that could be affected by the agent of change principle is not restricted to residential uses. For example, an office, retail or leisure use that is proposed next to a wastewater management operation may not be acceptable due to concerns over odour. This is reflective of 'Guidance on the assessment of odour for planning' (Version 1.1. July 2018) produced

by the Institute of Air Quality Management. Our amended wording for the 3rd bullet point is set out below:

'3. Where new residential development is proposed adjacent or close to an existing use employment or industrial activity which could have potential adverse effects, then it is the responsibility of the applicant of the residential scheme proposed development (as the 'agent of change') to undertake the relevant impact assessments and provide suitable mitigation to ensure there will be no significant adverse impacts on future residents or occupiers.'

UUW Property Interests

On receipt of the aforementioned GIS shp files, we would wish to confirm any allocations where we have land interests such as easements and rights of access which are in addition to our statutory rights for inspection, maintenance and repair. These land interests may have restrictions that must be adhered to. It is the responsibility of the developer to obtain a copy of the associated legal document, available from UUW's Legal Services or Land Registry and to comply with the provisions stated within the document.

We recommend that landowners/developers contact our Property Services team at to discuss how any proposals may interact with our land interests. Our easements, pipe structures and access rights should not be affected by the design and construction of new development.

Summary

Moving forward, we respectfully request that the council continues to consult with UUW for all future planning documents. We are keen to continue working in partnership with Sefton Council to ensure that all new growth can be delivered sustainably. In the meantime, if you have any queries or would like to discuss this representation, please do not hesitate to contact me.

Yours faithfully

Andrew Leyssens
Planning, Landscape and Ecology
United Utilities Water Limited

Enc. Tables 1 and 2

Issues Identified by United Utilities Water Limited

Initial Site Assessment

Table 1. On-site Modelled Sewer Flood Risk

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
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