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**From:** Goodwin, Joanna [<mailto:Joanna.Goodwin@pbworld.com>]  
**Sent:** 28 January 2015 14:02  
**To:** Thomas, Edward  
**Cc:** Fahey, David  
**Subject:** P132338/CE - Land north west of Hereford (Three Elms, Between Roman Road and Kings Acre Road, Hereford,

Ed,

Please find attached our response in regard to flood risk and drainage aspects to the pre-application enquiry for development on land north west of Hereford.

Kind regards,

**Joanna Goodwin**  
MEng PGDip MCIWEM C.WEM  
Principal Engineer, Water Engineering  
Civils, Structures and Ground Engineering

**Parsons Brinckerhoff**  
Queen Victoria House  
Redland Hill, Bristol BS6 6US, UK  
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**SITE:** Land north west of Hereford (Three Elms, Between Roman Road and Kings Acre Road, Hereford)  
**TYPE:** Pre-application advice  
**DESCRIPTION:** Urban extension comprising 1090 dwellings, 10ha employment, primary school, community hub, transport interchange and open space  
**APPLICATION NO:** P132338/CE  
**GRID** OS 348422, 241717  
**REFERENCE:**  
**APPLICANT:** The Church Commissioners for England  
**DATE OF THIS RESPONSE:** 28 January 2015

### **Introduction**

This response is in regard to flood risk and land drainage aspects, with information obtained from the following sources:

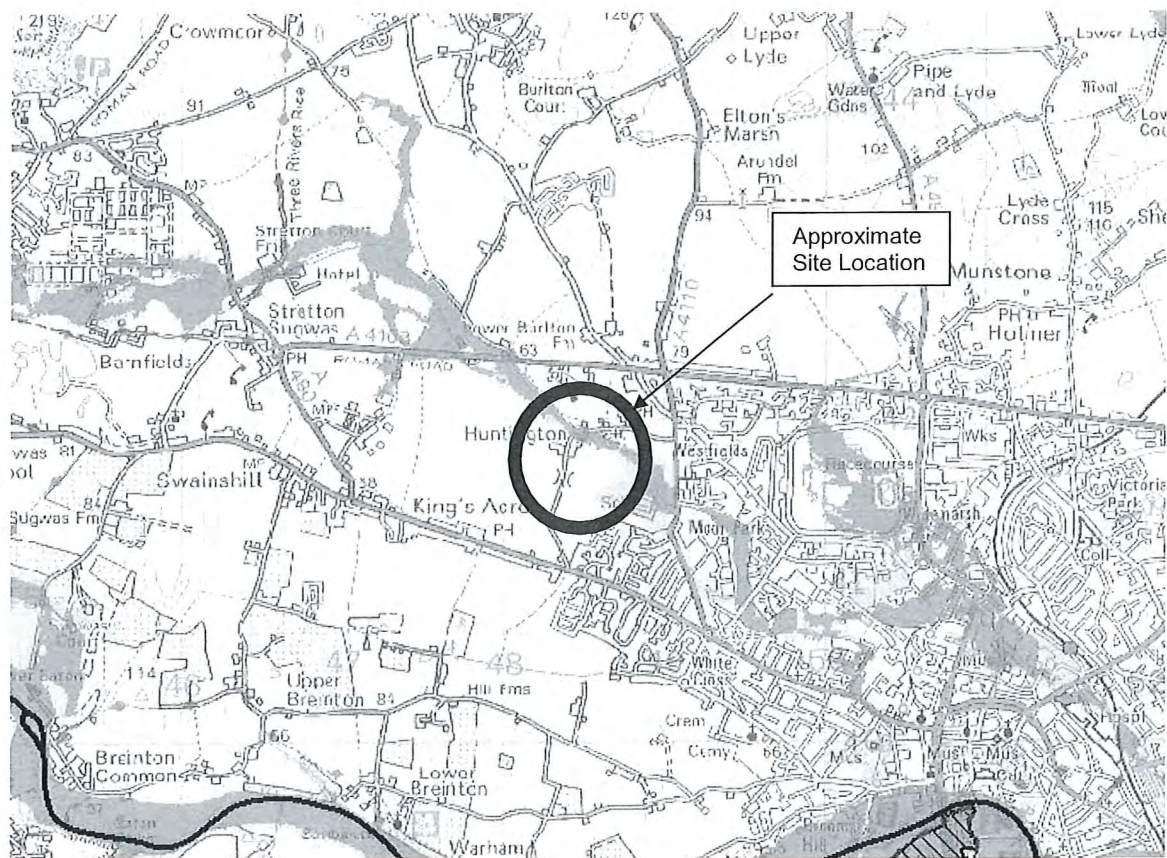
- Environment Agency (EA) indicative flood maps available through the EA website.
- EA groundwater maps available through the EA website.
- Ordnance Survey mapping.
- Strategic Flood Risk Assessment for Herefordshire.
- Herefordshire Unitary Development Plan - March 2007.

Our knowledge of the development proposals has been obtained from the following sources:

- EIA Scoping Report dated December 2014.
- Proposed land use plans.

### **Site Location**

*Figure 1: Environment Agency Flood Map for Planning (Rivers and Sea), January 2015*



## **Overview of the Proposal**

The Applicant's proposals include the provision of up to 1,090 new dwellings, a 1-form entry primary school, up to 10ha of employment land, convenience retail and community uses, a park and ride / transport interchange comprising up to 150 car parking spaces, land and infrastructure set aside for the potential Hereford Western Relief Road, a new linear park along Yazor Brook, appropriate sports and play facilities and formal and informal open space.

The site currently comprises greenfield land and measures 104 hectares (ha) in area. The Yazor Brook flows north-west to south-east through the site. The site is located within the catchment of the River Wye.

## **Fluvial Flood Risk**

Review of the Environment Agency's Flood Map for Planning (Figure 1) indicates that the majority of the site is located within the low risk Flood Zone 1. However, the centre of the site is indicated to be located within the medium risk and high risk Flood Zones 2 and 3 associated with the Yazor Brook ordinary watercourse.

In accordance with Environment Agency standing advice, the planning application should be supported by a Flood Risk Assessment (FRA) undertaken in accordance with National Planning Policy Framework (NPPF) and its supporting Technical Guidance. This is summarised in Table 1.

*Table 1: Scenarios requiring a FRA*

	<b>Within Flood Zone 3</b>	<b>Within Flood Zone 2</b>	<b>Within Flood Zone 1</b>
<b>Site area less than 1ha</b>	FRA required	FRA required	FRA not required
<b>Site area greater than 1ha</b>	FRA required	FRA required	FRA required

The FRA should clarify the extent and depth of fluvial flood risk within the site boundary and consider the potential effects of climate change. The FRA should also identify how flood risk to the proposed development has been minimised, how the development has been made safe, how the impacts of the development on people and property elsewhere have been avoided, and the management of the additional surface water runoff generated by the proposed development. The Applicant should also give consideration to any other minor watercourses that could pose flood risk to the development as well as anecdotal evidence.

Given the sensitivity of the development and the extent of the site within Flood Zone 2 and 3, the Applicant should consider the potential effects of climate change when assessing the Flood Zones. The SFRA advises that the extent of the modelled flood extents could be increased by 10m to take into account climate change effects, although modelled flood data is always preferred and we recommend that the Applicant consults with the Environment Agency regarding the availability of modelled data. Alternatively Environment Agency Standing Advice suggests that 300mm can be added to the modelled or predicted flood level for the present day events.

The Planning Practice Guidance to NPPF identifies five classifications of flood risk vulnerability and provides recommendations on the compatibility of each vulnerability classification within each of the Flood Zones, as shown in Table 2.



Table 2: Flood risk vulnerability and flood zone compatibility

EA Flood Zone	Essential Infrastructure	Water Compatible	Highly Vulnerable	More vulnerable	Less vulnerable
Zone 1	✓	✓	✓	✓	✓
Zone 2	✓	✓	Exception test required	✓	✓
Zone 3a	Exception test required	✓	✗	Exception test required	✓
Zone 3b	Exception test required	✓	✗	✗	✗

✓ Development considered acceptable

✗ Development considered unacceptable

The Planning Practice Guidance to NPPF states that residential developments and educational establishments are to be considered as 'more vulnerable' development. Buildings used for shops, financial, professional and other services are considered 'less vulnerable' development. The land set aside for the potential Hereford Western Relief Road is considered as 'essential infrastructure'.

With reference to Table 2, 'essential infrastructure' and 'more vulnerable' development would be considered appropriate in Flood Zones 1 and 2. However, for these developments in Flood Zone 3a the Exception Test would need to be passed. 'Less vulnerable' development would be considered appropriate for Flood Zones 1, 2 and 3a. No development would be permitted in the functional floodplain, Flood Zone 3b, with the exception of 'essential infrastructure' and subject to the Exception Test.

In accordance with NPPF, new development should be steered away from areas at flood risk through the application of the Sequential Test. NPPF states that development should not be permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding. Considering the size of this development and its location on predominantly Greenfield land, we would recommend that no development is located within those areas identified to be at fluvial flood risk and that the development aspires to maintain and enhance areas identified to be important for flood risk management and conveyance.

If, following application of the Sequential Test, it is not possible for the development to be located in zones with a lower probability of flooding, the Exception Test can be applied.

For the Exception Test to be passed, a site-specific FRA must be prepared that demonstrates:

- It is not possible for the development to be located on land with a lower probability of flooding;
- The development provides wider sustainability benefits to the community that outweigh flood risk, and;
- The development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

Although less vulnerable/more vulnerable development may be considered appropriate in Flood Zone 2/3a, NPPF still requires that a sequential approach is applied to guide new development to areas of lower flood risk, where possible. We strongly recommend that the Applicant

considers fluvial flood risks at the location of the proposed school as this is indicated to be in close proximity to the Yazor Brook and could be at risk when the potential effects of climate change are considered.

Where development is proposed in areas of existing flood storage during the 1 in 100 year event, compensatory flood storage should be provided on a level for level basis so as not to increase flood risk elsewhere. Additional flood resilience measures will also be required for development within the modelled Flood Zones, including a flood warning and evacuation plan and demonstration of safe access and egress. This should be discussed and agreed with the Herefordshire Emergency Planners.

Finished floor levels may need to be raised to protect the proposed development against flood risk. Typically, this would be 0.3m to 0.6m above the predicted (or recorded) 1 in 100 year flood level and allowing for the potential effects of climate change.

For development within or in close proximity to the modelled Flood Zones, we also recommend that flood resilience measures are built into the design of the new building, with guidance obtained from the report 'Improving the Flood Performance of New Buildings: Flood Resilient Construction, Communities and Local Government, May 2007'.

This guidance is in accordance with requirements of the NPPF and the Unitary Development Plan policy DR7. Guidance on the required scope of the FRA is available on the GOV-UK website at <https://www.gov.uk/planning-applications-assessing-flood-risk>.

### **Other Considerations and Sources of Flood Risk**

The FRA should give consideration to the risk of flooding on site from all sources, including surface water, groundwater, sewers, reservoirs and any other manmade sources.

The Applicant should also give due consideration to any other known local sources of flood risk within the vicinity of the site, i.e. those commonly associated with culvert blockages, sewer blockages or unmapped drainage ditches.

### **Surface Water Drainage**

The Applicant should provide an outline surface water drainage strategy showing how surface water from the proposed development will be managed. The strategy must demonstrate that there is no increased risk of flooding to the site or downstream of the site as a result of development between the 1 in 1 year event and up to the 1 in 100 year event and allowing for the potential effects of climate change. Where possible, betterment over existing conditions should be promoted.

Under Schedule 3 of the Flood Water Management Act 2010 (due to be enacted in 2015) all new drainage systems for new and redeveloped sites must meet the new National Standards for Sustainable Drainage (currently in draft) and will require approval from the Lead Local Flood Authority (Herefordshire Council). If approval is gained, the site drainage may be eligible for adoption by Herefordshire Council. Further guidance will be available from Herefordshire Council in 2015.

In accordance with the draft National Standards for Sustainable Drainage and Policy DR4 of the Unitary Development Plan, the drainage strategy should incorporate the use of Sustainable Drainage (SUDS) where possible. The approach promotes the use of infiltration features in the

first instance. If drainage cannot be achieved solely through infiltration due to site conditions or contamination risks, the preferred options are (in order of preference): (i) a controlled discharge to a local watercourse, or (ii) a controlled discharge into the public sewer network (depending on availability and capacity). The rate and volume of discharge should strive to provide betterment and be restricted to the pre-development Greenfield values. Reference should be made to Defra/EA document 'Preliminary Rainfall Runoff Management for Developments' (Revision E, January 2012) for guidance on calculating Greenfield runoff rates and volumes.

The Applicant must consider the management of surface water during extreme events that overwhelm the surface water drainage system and/or occur as a result of blockage. Surface water should either be managed within the site boundary or directed to an area of low vulnerability. Guidance for managing extreme events can be found within CIRIA C635: Designing for exceedance in urban drainage: Good practice.

Consideration should also be given to the control of potential pollution of ground or surface waters from wash down, vehicles and other potentially contaminating sources. Evidence of adequate separation and/or treatment of polluted water should be provided to ensure no risk of pollution is introduced to groundwater or watercourses both locally and downstream of the site, especially from proposed parking and vehicular areas. SUDS treatment of surface water is considered preferential but 'Pollution Prevention Guidance: Use and design of oil separators in surface water drainage systems: PPG 3' provides guidance on the necessity and application of oil separators should one be required.

It is anticipated that a site of this size will be developed in phases and therefore it is recommended that the applicant considers completing a strategic surface water drainage assessment for the site as a whole to enable an overall drainage strategy to be formulated and then followed on a plot by plot basis. It is expected that this site will demonstrate exemplar use of SUDS techniques with good use of the green space to accommodate a variety of SUDS features in order to control and clean runoff from the site.

### **Foul Water Drainage**

We recommend that the Applicant contacts the relevant public sewerage authority in regards to foul water discharge from the site to check whether it is feasible to connect to the public sewers. If there are no sewers within the vicinity of the site, the Applicant should consult with the EA regarding the use of a package treatment plant or other on-site method of wastewater treatment and disposal.





## MEMORANDUM

To : Internal Consultee

From : Mr Edward Thomas, Planning Services, Blueschool House - H31

Tel : 01432 260479 My Ref : P132338/CE

Date : 12 January 2015

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**SITE:** Land north west of Hereford (Three Elms, Between Roman Road and Kings Acre Road, Hereford,

**APPLICATION TYPE:** Pre App Advice

**DESCRIPTION:** Pre-application advice for an urban extension comprising 1090 dwellings, 10ha employment, primary school, community hub, transport interchange and open space.

**APPLICATION NO:** P132338/CE

**GRID REFERENCE:** OS 348422, 241717

**APPLICANT:** The Owner and/or Occupier

**PARISH:** Hereford

Please find attached a scoping report for the above development. The Council would appreciate a response within 21 days directly to Edward Thomas  
[ethomas@herefordshire.gov.uk](mailto:ethomas@herefordshire.gov.uk)

**PRE APPLICATION ADVICE REQUEST**  
(Please use the following box to enter your response)

In addition to the work identified, the assessment should consider the following:

1. Identify the key views to and from the heritage assets.
2. Following the desk-based assessment there needs to be further consultation with the Heritage Officer to review the non-designated heritage assets identified as part of the assessment as this may need adjustment.

As a general point, this is a large development site and therefore its impacts will be felt more widely than the immediate vicinity of site. Therefore the boundaries of the assessment should not be too rigid and if necessary the assessment should look at the wider context especially in relation to views of historic assets.

The assessment should make sure that the curtilage buildings at Huntingdon Court Farm are considered since they are a complex of historic agricultural buildings.

The application form, plans and supporting documents are available in Wisdom.

Please let me have your comments by 02/02/2015. If I have received no response by this date I shall assume that you have no objections. Should you require further information please contact the Case Officer.

Any comments should be added below and actioned in Civica to Mr Edward Thomas.

Comments: (Continue on a separate sheet if necessary)

Object ☐

Support ☐

No Objection ☐

Approve with Conditions ☐ (Please list below any conditions you wish to impose on this permission.)

Further information required ☐

Consultation response from: Janet Poole, Senior Building Conservation Officer

DATE RETURNED: .....13/03/15.....

## MEMORANDUM

To : Internal Consultee

From : Mr Edward Thomas, Planning Services, Blueschool House - H31

Tel : 01432 260479 My Ref : P132338/CE

Date : 12 January 2015

**SITE:** Land north west of Hereford (Three Elms, Between Roman Road and Kings Acre Road, Hereford,

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**PARISH:** Hereford

Please find attached a scoping report for the above development. The Council would appreciate a response within 21 days directly to Edward Thomas  
[ethomas@herefordshire.gov.uk](mailto:ethomas@herefordshire.gov.uk)

PRE APPLICATION ADVICE REQUEST  
(Please use the following box to enter your response)

### Consultation Response

#### Planning Context:

NPPF: Paragraph 109

UDP: LA2, LA3, LA5, LA6

#### Landscape Impact:

- The site is essentially undeveloped agricultural land, the baseline should be assessed within the context of its Landscape Character Type; Principal Settled Farmlands (LCA 2004).
- Existing vegetation up to and including boundaries should be assessed as part of an arboricultural survey
- Consideration should be given to impact upon the setting of sensitive receptors including those lying within Huntingdon Conservation Area; Listed buildings and the unregistered park and garden of Huntingdon Court
- The proposal is located on flat low lying land at approximately 65m AOD, long range views from the west are anticipated from elevated locations including Burghill and

#### Designations:

##### Landscape Character Type:

AONB

Conservation Area ✓

Scheduled Ancient Monument

Listed Buildings ✓

Historic Park and Garden ✓

TPOs/ Designated Habitat

Other

*Credenhill the visual impact of which should be assessed as part of the LVIA, which should be written in accordance with GLVIA 3<sup>rd</sup> edition guidance (2013)*

- The western edge of the proposal will be particularly sensitive and the transition between open space and built form should be addressed. How the proposed employment space and park and ride sit within their surroundings should be addressed, in conjunction with HC Urban Sensitivity Analysis (2010).*
- Green infrastructure should be integrated into the proposal at the initial design stages, and should be in accordance with HC Green Infrastructure Strategy (2010). The proposed linear park along Yazor Brook is welcomed, it is recommended that green space extend from the park into the proposed residential areas providing strong pedestrian links to existing services.*

The application form, plans and supporting documents are available in Wisdom.

Please let me have your comments by 02/02/2015. If I have received no response by this date I shall assume that you have no objections. Should you require further information please contact the Case Officer.

Any comments should be added below and actioned in Civica to Mr Edward Thomas.

Comments: (Continue on a separate sheet if necessary)

Object ☐

Support ☐

No Objection ☐

Approve with Conditions ☐ (Please list below any conditions you wish to impose on this permission.)

Further information required ☐

Consultation response from: E. Duberley

DATE RETURNED: .....16/3/15.....



## MEMORANDUM

To : Internal Consultee

From : Mr Edward Thomas, Planning Services, Blueschool House - H31

Tel : 01432 260479 My Ref : P132338/CE

Date : 12 January 2015

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<b>SITE:</b>	Land north west of Hereford (Three Elms, Between Roman Road and Kings Acre Road, Hereford,
<b>APPLICATION TYPE:</b>	Pre App Advice
<b>DESCRIPTION:</b>	Pre-application advice for an urban extension comprising 1090 dwellings, 10ha employment, primary school, community hub, transport interchange and open space.
<b>APPLICATION NO:</b>	P132338/CE
<b>GRID REFERENCE:</b>	OS 348422, 241717
<b>APPLICANT:</b>	The Owner and/or Occupier
<b>PARISH:</b>	Hereford

Please find attached a scoping report for the above development. The Council would appreciate a response within 21 days directly to Edward Thomas  
[ethomas@herefordshire.gov.uk](mailto:ethomas@herefordshire.gov.uk)

### PRE APPLICATION ADVICE REQUEST (Please use the following box to enter your response)

Thank you for consulting me in relating to the scoping report. The site is identified as having a potential for a sand and gravel resource beneath the surface. Sand and Gravel, as with other minerals are essential to support sustainable economic growth and our quality of life. Planning guidance has for many years sought to protect mineral resources from sterilization as they are a non-renewable resource. National policy relating to this is currently set out in paragraphs 142 - 149 of the National Planning Policy Framework. Paragraph 143 requires Local Planning Authorities to set out policies to encourage the prior extraction of minerals, where practical and environmentally feasible, if it is necessary for non mineral development to take place.

Within the Herefordshire Unitary Development Plan, Policy S9 ensures that the sustainable and efficient use and management of minerals will be promoted by amongst other things, preventing the unnecessary sterilization of mineral resources. The long term requirement for aggregate and other mineral resources to be worked is recognized and therefore, proposals which could sterilize potential future mineral workings will be resisted in order to safeguard identified mineral resources. Policy M5 within the HUDP requires that where such development is proposed the applicant may be required to:

1. undertake a geological assessment of the site; and or
2. protect the mineral in question; and/or
3. extract all or part of the mineral reserve as part of or before the other development is permitted.

The Scoping Report submitted has not given any indication that the sand and gravel resource is to be investigated or examined. The applicant needs to carry out investigations to identify whether the sand

and gravel resource is viable for mineral extraction. If the mineral resource is viable, the applicant needs to consider whether it could be extracted economically and without environmental harm prior to the development-taking place. It is considered that the Environmental Impact Assessment should address the mineral safeguarding issues for the proposed development. Failure to adequately address mineral safeguarding issues would result in the application being contrary to both local and national policies.

The applicant needs to demonstrate to the satisfaction of the Local Planning Authority (LPA) that the sand and gravel concerned is not of economic value or that it can be extracted to the satisfaction of the LPA without unacceptable community and environmental impacts prior to the development taking place.

*Ms R Jenman  
Principal Planning Officer  
Minerals & Waste*

The application form, plans and supporting documents are available in Wisdom.

Please let me have your comments by 02/02/2015. If I have received no response by this date I shall assume that you have no objections. Should you require further information please contact the Case Officer.

Any comments should be added below and actioned in Civica to Mr Edward Thomas.

Comments: (Continue on a separate sheet if necessary)

Object ☐

Support ☐

No Objection ☐

Approve with Conditions ☐ (Please list below any conditions you wish to impose on this permission.)

Further information required ☐

Consultation response from: *Ms R Jenman, Principal Planning Officer – Minerals & Waste*

DATE RETURNED: .....16<sup>th</sup> March 2015.....



## MEMORANDUM

To : Internal Consultee - Transportation

From : Mr Edward Thomas, Planning Services, Blueschool House - H31

Tel : 01432 260479 My Ref : P132338/CE

Date : 12 January 2015 Your Ref :

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<b>SITE:</b>	Land north west of Hereford (Three Elms, Between Roman Road and Kings Acre Road, Hereford,
<b>APPLICATION TYPE:</b>	Pre App Advice
<b>DESCRIPTION:</b>	Pre-application advice for an urban extension comprising 1090 dwellings, 10ha employment, primary school, community hub, transport interchange and open space.
<b>APPLICATION NO:</b>	P132338/CE
<b>GRID REFERENCE:</b>	OS 348422, 241717
<b>APPLICANT:</b>	The Owner and/or Occupier
<b>AGENT:</b>	Mr Ben Simpson

Please find attached a scoping report for the above development. The Council would appreciate a response within 21 days directly to Edward Thomas  
[ethomas@herefordshire.gov.uk](mailto:ethomas@herefordshire.gov.uk)

### PRE APPLICATION ADVICE REQUEST

Please let me have your comments by 02/02/2015. If I have received no response by this date I shall assume that you have no advice to offer. Should you require further information please contact the Case Officer. Any comments should be actioned in Civica to Mr Edward Thomas.

**COMMENTS:** (Continue on a separate sheet if necessary)

**SITE VISITED:** YES

Previous comments in respect of the pre application are still relevant and do not appear to have been taken on board.

The proposals are still considered premature, particularly in terms of impact upon the inner corridor for the Western Relief Road. Whilst a corridor is indicated on the masterplan, such corridor has not been finalised and any route option indicated in the Study of Options Report 2010 is at this time only indicative of one of a number of route options within the corridor and used for comparison purposes within that study.

Therefore such a corridor cannot be agreed, neither can any part of the development within the overall corridor be considered without possibly prejudicing or restricting the future delivery of the road.

Six points of access to the site are proposed, two each to Roman Road, Three Elms Road and Kings Acre Road. These access points onto Roman Road and Kings Acre road in my view cannot be permitted until the alignment of the WRR is finalised and interaction of any other junctions (proposed or existing) can be assessed.

Similarly the direct access points from the WRR shown to the employment land and the Park and Choose site are unlikely to be acceptable on this road due to the important role that it is to serve. Furthermore users of the Park and Share travelling onward by cycle or foot will need to cross the WRR to access Hereford and schools, workplaces and facilities, and this is therefore unlikely to be considered an acceptable location.

A draft Transport Scoping Note has been received dated 20 January 2015, outside of the pre application package. It is presumed this is the TA scoping report referred to in 4.6.3 of the EIA Scoping Report. This is currently being reviewed by our consultants and Highways Agency as to scope, methodology and extent. The EIA scoping report and TA scoping report both mention a phased development, with an initial phase of 500 dwellings, but does not identify where on the site Phase 1 (pre WRR) will be located and therefore the acceptability of such proposals cannot be commented upon. Unless such part of the site adjoined Three Elms Road and was accessed via that route, and outside the inner WRR corridor, it would be considered to be unacceptable. The sustainable routes would be likely to pass through that part of the site and therefore be likely to require that part of the site to be developed first.

The methodology, scope and extent of the proposed modelling work is currently being reviewed by our consultants and comments will be forwarded in due course.

A study will be needed to assess the number of dwellings that can be achieved without the WRR, both for individual sites and cumulatively. The need to consider other strategic sites and their cumulative effects is also being discussed internally, as to how this will be required to be assessed by individual developers and how any necessary overall restrictions could be applied in terms of permissible dwelling numbers pre WRR.

SIGNED: Adrian Smith – Area Engineer Development Control (Transportation)

DATE RETURNED: 17<sup>th</sup> February 2015



**TO: DEVELOPMENT MANAGEMENT- PLANNING AND  
TRANSPORTATION  
FROM: ENVIRONMENTAL HEALTH AND TRADING  
STANDARDS**



**APPLICATION DETAILS**

168825 / P132338/CE

Land north west of Hereford (Three Elms, Between Roman Road and Kings Acre Road, Hereford  
Susannah Burrage, Environmental Health Officer

I have received the above application on which I would be grateful for your advice.  
The application form and plans for the above development can be viewed on the Internet within 5-7  
working days using the following link: <http://www.herefordshire.gov.uk>

I would be grateful for your advice in respect of the following specific matters: -

<input type="checkbox"/>	Air Quality	<input type="checkbox"/>	Minerals and Waste
<input type="checkbox"/>	Contaminated Land	<input type="checkbox"/>	Petroleum/Explosives
<input type="checkbox"/>	Landfill	<input type="checkbox"/>	Gypsies and Travellers
<input type="checkbox"/>	Noise	<input type="checkbox"/>	Lighting
<input type="checkbox"/>	Other nuisances	<input type="checkbox"/>	Anti Social Behaviour
<input type="checkbox"/>	Licensing Issues	<input type="checkbox"/>	Water Supply
<input type="checkbox"/>	Industrial Pollution	<input type="checkbox"/>	Foul Drainage
<input type="checkbox"/>	Refuse	<input type="checkbox"/>	
<input type="checkbox"/>		<input type="checkbox"/>	

Please can you respond by ..

**Comments**

I refer to the EIA Scoping Report reference the Western Urban Expansion. In general terms I am  
satisfied with the proposed methodology to be used in the Scoping Report.

However, I do note that an element of the development is zoned for employment use and any  
application will need to address the potential for nuisance to emanate from this site to impact on  
residential development. Consideration will need to be made as to whether the boundary to this site be  
zoned for B1 use only and in consideration of any industrial activity, an assessment of the impact of  
this on sensitive receptors to BS4142 will need to be made.

In addition, I recommend that at any outline stage a comprehensive noise and dust management plan  
be submitted for the construction phase of any development.

Signed: Susannah Burrage

Date: 27 January 2015

TO: ENVIRONMENTAL HEALTH AND TRADING STANDARDS  
FROM: DEVELOPMENT MANAGEMENT- PLANNING AND  
TRANSPORTATION



**APPLICATION NO:** P132338/CE  
**DESCRIPTION:** Pre-application advice for an urban extension comprising 1090 dwellings, 10ha employment, primary school, community hub, transport interchange and open space.  
**SITE:** Land north west of Hereford (Three Elms, Between Roman Road and Kings Acre Road, Hereford,  
**APPLICATION TYPE:** Pre App Advice  
**PARISH:** Hereford  
**GRID REF:** OS 348422, 241717  
**CASE OFFICER:** Mr Edward Thomas  
**WEBSITE:** <http://www.herefordshire.gov.uk/searchplanningapplications>

**Please find attached a scoping report for the above development. The Council would appreciate a response within 21 days directly to Edward Thomas [ethomas@herefordshire.gov.uk](mailto:ethomas@herefordshire.gov.uk)**

I have received the above application on which I would be grateful for your advice.

The form and plans for the above development are attached  
I would be grateful for your advice in respect of the following specific matters: -

X	Air Quality		Minerals and Waste
X	Contaminated Land		Petroleum/Explosives
	Landfill		Gypsies and Travellers
X	Noise		Lighting
	Other nuisances		Water Supply
	Licensing Issues		Foul Drainage
	Industrial Pollution		Biomass Boilers
		X	PRE APPLICATION ADVICE - SCOPING REPORT
	<b>Additional Info</b>		<b>Amended Plans</b>

Please can you respond by 02/02/2015 to [ethomas@herefordshire.gov.uk](mailto:ethomas@herefordshire.gov.uk)

#### Comments

I refer to the above application and would make the following comments in relation to contaminated land issues only.

"EIA Scoping Report, Western Urban Expansion- Three Elms, Hereford." Prepared by Waterman, Dated December 2014, ref:EED14013-101\_R1.3.1.

The scoping report prepared by Waterman recognises the possibility of encountering contamination on site and will address this through further works. As such, when consulted it is likely we would recommend a condition be appended to any planning approval to ensure the site is demonstrated both safe and suitable for use. For ease of reference I have included a suitable condition below.

1. No development shall take place until the following has been submitted to and approved in writing by the local planning authority:
  - a) a 'desk study' report including previous site and adjacent site uses, potential contaminants arising from those uses, possible sources, pathways, and receptors, a conceptual model and a risk assessment in accordance with current

best practice

- b) if the risk assessment in (a) confirms the possibility of a significant pollutant linkage(s), a site investigation should be undertaken to characterise fully the nature and extent and severity of contamination, incorporating a conceptual model of all the potential pollutant linkages and an assessment of risk to identified receptors
- c) if the risk assessment in (b) identifies unacceptable risk(s) a detailed scheme specifying remedial works and measures necessary to avoid risk from contaminants/or gases when the site is developed. The Remediation Scheme shall include consideration of and proposals to deal with situations where, during works on site, contamination is encountered which has not previously been identified. Any further contamination encountered shall be fully assessed and an appropriate remediation scheme submitted to the local planning authority for written approval.

Reason: In the interests of human health and to ensure that the proposed development will not cause pollution to controlled waters or the wider environment.

- 2. The Remediation Scheme, as approved pursuant to condition no. (1) above, shall be fully implemented before the development is first occupied. On completion of the remediation scheme the developer shall provide a validation report to confirm that all works were completed in accordance with the agreed details, which must be submitted before the development is first occupied. Any variation to the scheme including the validation reporting shall be agreed in writing with the Local Planning Authority in advance of works being undertaken.

Reason: In the interests of human health and to ensure that the proposed development will not cause pollution to controlled waters or the wider environment.

- 3. If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the local planning authority) shall be carried out until the developer has submitted, and obtained written approval from the local planning authority for, an amendment to the Method Statement detailing how this unsuspected contamination shall be dealt with.

Reason: In the interests of human health and to ensure that the proposed development will not cause pollution to controlled waters or the wider environment.

Technical notes about the condition

- 1. I would also mention that the assessment is required to be undertaken in accordance with good practice guidance and needs to be carried out by a suitably competent person as defined within the National Planning Policy Framework 2012.
- 2. And as a final technical point, we require all investigations of potentially contaminated sites to undertake asbestos sampling and analysis as a matter of routine and this should be included with any submission.

Signed: N James

Date: 26<sup>th</sup> January 2015