

Herefordshire Council  
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Blueschool House  
Blueschool Street  
Hereford  
HR1 2ZB

**Date: 09/10/2019**  
**Our Ref: PLA0045052**  
**Your Ref: 193165**

Dear Sir

**Grid Ref: SO5261440823 352614 240823**

**Site: Former Broadlands School, Eastnor Drive, Hereford**

**Development: Demolition of the former Broadlands Primary School buildings and the erection of a new SEND College, carparking, landscaping, amenity space and associated facilities**

We refer to your planning consultation relating to the above site, and we can provide the following comments in respect to the proposed development.

We have reviewed the information submitted as part of this application with particular focus on the Flood Risk Assessment and Drainage Strategy 2019-068 P1, drawing reference FS0829-NOL-19-00-DR-C-0100 Rev P3 and the Construction Environmental Management Plan (CEMP) and note that the intention is subject to further investigations, to connect both foul and surface water to the public sewer.

We note that no percolation tests have been undertaken to assess the potential to use soakaways and it is not clear as to where the site will connect off site to the existing public sewer network. We also note the current and proposed surface water discharge rate and whilst we welcome the introduction of attenuation we acknowledge that there could be further opportunities to introduce SuDS features to reduce the overall discharge rate further.

Notwithstanding the above we have no objection to the proposed development, however if you are minded to grant planning permission we request that the following **Conditions and Advisory Notes** are included within any subsequent consent.

## **Conditions**

No development shall commence until a drainage scheme for the site has been submitted to and approved in writing by the Local Planning Authority. The scheme shall provide for the disposal of foul, surface and land water, and include an assessment of the potential to dispose of surface and land water by sustainable means. Thereafter the scheme shall be implemented in accordance with the approved details prior to the occupation of the development and no further foul water, surface water and land drainage shall be allowed to connect directly or indirectly with the public sewerage system.

Reason: To prevent hydraulic overloading of the public sewerage system, to protect the health and safety of existing residents and ensure no pollution of or detriment to the environment.

## **Advisory Notes**

The applicant may need to apply to Dwr Cymru / Welsh Water for any connection to the public sewer under S106 of the Water Industry Act 1991. If the connection to the public sewer network is either via a lateral drain (i.e. a drain which extends beyond the connecting property boundary) or via a new sewer (i.e. serves more than one property), it is now a mandatory requirement to first enter into a Section 104 Adoption Agreement (Water Industry Act 1991). The design of the sewers and lateral drains must also conform to the Welsh Ministers Standards for Gravity Foul Sewers and Lateral Drains, and conform with the publication "Sewers for Adoption"- 7th Edition. Further information can be obtained via the Developer Services pages of [www.dwrcymru.com](http://www.dwrcymru.com)

The applicant is also advised that some public sewers and lateral drains may not be recorded on our maps of public sewers because they were originally privately owned and were transferred into public ownership by nature of the Water Industry (Schemes for Adoption of Private Sewers) Regulations 2011. Under the Water Industry Act 1991 Dwr Cymru Welsh Water has rights of access to its apparatus at all times.

Our response is based on the information provided by your application. Should the proposal alter during the course of the application process we kindly request that we are re-consulted and reserve the right to make new representation.

If you have any queries please contact the undersigned on 0800 917 2652 or via email at [developer.services@dwrcymru.com](mailto:developer.services@dwrcymru.com)

Please quote our reference number in all communications and correspondence.

Yours faithfully,

**Matthew Lord**  
**Development Control Officer**  
**Developer Services**



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Welsh and English

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