



**Geraint John Planning**

Andrew Bates  
E: [andrew@gjplanning.co.uk](mailto:andrew@gjplanning.co.uk)  
T : 02920 105360  
M : 07807 800272  
Office 16 (House 1, 2<sup>nd</sup> Floor)  
The Maltings  
East Tyndall Street  
Cardiff  
CF24 5EA  
[www.geraintjohnplanning.co.uk](http://www.geraintjohnplanning.co.uk)

23<sup>rd</sup> January 2019

Planning Services  
Herefordshire Council  
Planning Services  
PO Box 4  
Hereford  
HR4 0XH

**FAO: Kelly Gibbons (Principal Planning Officer - Development Management)**

Dear Sir / Madam,

**Land at Station Approach, to the North East of the Hereford City Link Road (A465), Hereford  
HR1 2BG  
Planning Application No: P183841**

Following receipt of consultee comments and on-going dialogue with Council Officers and Statutory Consultees we write to submit a comprehensive package of amended and additional drawings / information.

**Enclosed Documentation**

Please find enclosed the following documentation to address and document on-going scheme revisions and dialogue in respect to design, and to provide responses to issues arising from the consultation process:

- Revised Scheme Drawings – Elevations / Floorplans / Site Plans etc, as follows:

Drawing Title	Drawing No.	Revision
Proposed Ground Floor Plan - Option F	PL109	A
Proposed First Floor Plan - Option F	PL110	A
Proposed Second Floor Plan - Option F	PL111	A
Proposed Third Floor Plan - Option F	PL112	A
Proposed Fourth Floor Plan - Option F	PL113	A
Proposed Roof Plan - Option F	PL114	A
Proposed External Works Layout - Option F	PL115	B
Proposed South West Elevation - Option F	PL208	A
Proposed North East Elevation - Option F	PL209	A
Proposed South East & North West Elevations - Option F	PL210	A
Proposed Contextual Street Scene Elevations - Option F	PL211	/

Proposed Contextual Visual 1 - Option F	PL212	/
Proposed Contextual Visual 2 - Option F	PL213	/
Proposed Contextual Visual 3 - Option F	PL214	/
Roofscape Analysis	PL900	/
Proposed Substation Details	PL901	/

- Conservation Officer Design Response Document (Addendum to the Design & Access Statement);
- Landscaping Plan – Ecus Environmental Consultants Dwg No. LD-01 Rev E;
- Energy Strategy Report Clarification (Ridge) (dated 21<sup>st</sup> December 2018);
- Highways & vehicular access / circulation - including revised Tracking Details Drawing (Dwg No. 69753-CUR-00-00-DR-TP-001-02) and Entrance Crossover Drawing (Dwg No. S2832-SK-C0-01 RevP1);
- Flood Risk – Response to the Environment Agency's letter dated 21<sup>st</sup> December 2018 including Supplementary Information to the MBCE Flood Risk Assessment Rev O October 2018;
- Drainage Strategy & Associated Plan and details:
  - Design Principles to Mitigate Construction in Proximity to Existing Sewer Rev 2 November 2018;
  - Drawing Nos:
    - S2862-DS-100 RevP2 – Drainage Strategy Layout
    - S2862-WWDS-101 RevP3 – Drainage Strategy Layout – Option with Reduced Attenuation & Increased Outfall Rate
    - S2862-SKWWS03 Rev P1 – Existing Welsh Water Sewer Showing Building and Area Zone Plan
    - S2862-SKWWS01 RevP7 – Proposed Piling Solution
    - S2862-SKWW02 RevP7 – Building Layout and Existing Dwr Cymru Sewer
  - Method Statement – Repair and Protection of Welsh Water Existing Sewer (dated 16<sup>th</sup> November 2018) including Appendices A,B,C and D.
- Construction Environmental Management Plan (CEMP) (Construction Phase SHE Plan Hereford Student Accommodation Rev 2);
- Information regarding the need for the proposed student accommodation, the benefits the development will bring to Hereford and the commitment to showcasing student art on the site, including a Statement from Hereford College of Arts; and
- Interior Design Concept Proposal.

These submissions deal with the following matters which have been identified and set out in correspondence:



- Air Quality – addressed through the further revised plans and drawings (and to be the subject of a condition);
- Noise – addressed through the further revised plans and drawings (and to be the subject of a condition);
- Welsh Water – addressed through the submission of the drainage strategy;
- Archaeology - addressed through the further revised plans and drawings; and
- Bio-diversity / Ecology - addressed through the submission of the revised landscaping plan and scheme which incorporates bio-diversity enhancements, and associated submissions.

## **Substation**

The revised External Works Layout Drawing (Dwg No. PL115RevB) now includes a substation, which is required to serve both the proposed student accommodation and the future commercial development on site.

The footprint of the substation has been subtracted from the area of the site for which the applicant is seeking Outline permission for the future commercial development. Accordingly, the applicant is seeking Full permission for the substation. The design of the substation is provided in the Proposed Substation Details Drawing (Dwg No. PL901).

It is worthy of note that the design shown for the substation may well be superseded by a subsequent Reserved Matters application, which would seek to incorporate the substation into the design of the proposed commercial unit. Notwithstanding this, it is essential that detailed planning permission is secured for the substation at this stage, in order to ensure that the delivery of the substation does not compromise the ability of the applicant to deliver the student accommodation within the required timeframe.

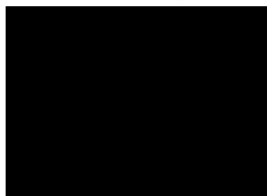
## **Summary**

The scheme resubmitted for consideration has undergone significant amendment following lengthy dialogue with the LPA and other parties. The applicant is confident that the level of development has been carefully formulated to ensure it is considered to be acceptable and appropriate. The scheme proposals have been defined in consideration of, and having regard to, the size of the site, the viability of the scheme, and density / character of surrounding development.

We trust that the enclosed documentation is sufficient to address each and all of the issues identified, and to ensure that the application is reported favourably to the February Committee.

Should you require any further information, please do not hesitate to contact me.

Yours faithfully



**Geraint John**

Director  
Geraint John Planning Ltd.

Enc: As above.

## **Preface**

Following a review of the outstanding matters (as documented overleaf), and following the extensive continued dialogue had, the following submissions are made in respect to each and all of the residual matters.

## **Revised Scheme Proposals / Response to Design Issues**

Extensive dialogue has been on-going with the Council's Principal Conservation Officer (Matthew Knight) and others (including Historic England) regarding the design, form, and appearance of the development.

The revised scheme drawings submitted herein represent a package of revised / additional information that respond to the detailed comments made and the iterative design process that has been embarked on.

The submitted Conservation Officer Design Response Document – which is intended to act as an Addendum to the Design & Access Statement, sets out the following:

- Issue / Topic;
- Conservation Officer's Comments;
- References / Precedents from the Conservation Officer;
- Whittam Cox Comments; and
- Whittam Cox Design response.

This document provides a comprehensive account of the main points raised, attended to, and sets out a detailed explanation of the revisions made. It is both a factual account of the iterative process undertaken over the last few weeks, and serves as an explanation of the changes made (or where changes have not been capably made, why that is the case, i.e. as a result of site and build constraints etc).

The document serves as an Addendum to the Design & Access Statement originally accompanying the application.

In respect to Noise and Air Quality, measures within the fabric of the building have been revisited and revised, and the revised plans address these matters – subject to the imposition of conditions.

The revisions to the proposed elevational drawings (Nos. PL208, 209 and 210) now show the deletion of the louvres above each of the windows within the student rooms. The louvres have been omitted as the MVHR system has become centralised for each cluster. Appropriate levels of ventilation to the rooms have now been achieved without louvres to individual rooms and this will reduce levels of external noise entering the rooms.

## **Landscaping / Bio-diversity & Ecology**

The revised submission includes a hard and soft landscaping plan (drawing no. No. LD-01RevC), produced by Ecus Environmental Consultants.

The drawing responds to the comments of the Landscaping Officer (dated 16<sup>th</sup> November 2018) and the Open Space Officer (dated 19<sup>th</sup> November 2018). For ease of reference, these comments, and the applicant's response to each are as follows:



Landscape & Open Space Officers comments	Applicant's response
Overall / Principle	<p>"In principle, the concept to provide a contemporary living hub with gathering places; areas for students artistic expression; green space and general urban public life is a step in the right direction, more evidence is required to substantiate and validate these ideas and make it relevant to its place and setting, and take into consideration the scale of the building".</p>
Scale and vertical green infrastructure	<p>The Officer recommended the introduction of "large mature trees with subsequent root provisions (sub surface cell structure system or sufficient soil zones) to allow for trees of stature that complement the scale of the building and the existing tree structure. The Officer also acknowledged that: "The Welsh Water infrastructure is a potential constraint (however is at considerable depth), so all endeavours should be made to maximise the opportunities that do exist and look to other design strategies that could be applied to achieve vertical planting to support the scheme".</p> <p>The introduction of large mature trees within the frontage of the site is problematic due to the Dwr Cymru Welsh Water easement along the frontage of the site. Notwithstanding this every effort has been made to accommodate soft landscaping and to introduce greenery to the site. Along the frontage of the site (toward the northern end of the site) 3no. trees (with a minimum 2 metre clear stem are proposed). Elsewhere in the site ornamental planting including grasses are proposed to provide visual enclosure to the building and social spaces.</p>
Comfortable places	<p>"Consider the proximity of the outdoor space and roads and determine how an increased density of green infrastructure with insertions of hard space (seating, gathering and art collections), could create a more intimate residential environment that mitigates noise and pollution".</p> <p>Furthermore, the Open Space Officer provided comments (dated 19<sup>th</sup> November 2018) advising that users of this type of accommodation will need access to either on or off-site amenity green space for informal recreation. Some form or community garden space should be included on-site to allow students informal recreation opportunities within close proximity to their living accommodation.</p> <p>The landscaping plan identifies areas of private amenity space containing proposed "art plinths with integrated seating" and proposed benches and café style moveable seats in areas which encourage social interaction but discourage a pedestrian through route through the use of proposed hedging and soft landscaping.</p>
Accessibility (Ramp)	<p>The Landscape Officer also requested a 1:21 ramp to avoid handrails and integrate into a soft landscape.</p> <p>The landscaping plan now illustrates the use of such a ramp.</p>

In addition it is noted in the bio-diversity and ecology consultation response (C. Winder – Ecologist 26<sup>th</sup> October) that in terms of Nature Conservation – Ecology protection, it is suggested that a condition is imposed on any planning permission to require the preparation, submission and approval of a Construction Environmental Management Plan (CEMP) prior to commencement of development.

In response to this, and to obviate the need for a pre-commencement condition, a CEMP (Construction Phase SHE Plan Hereford Student Accommodation Rev 2) has been prepared and is submitted herein.

In summary, the revised proposals provide details of a high quality of design and materials for both hard and soft landscaping, and for bio-diversity enhancement - the implementation of which could capably be secured by the imposition of a Condition.

The proposed scheme is therefore now considered to comply with the requirements of Policies SS6 (Environment Quality and Local Distinctiveness, LD1 – Landscape and Townscape, LD2 Biodiversity and Geodiversity and LD3 (Green infrastructure) of the Herefordshire Local Plan.

## **Energy Strategy Report**

An Energy Strategy Report Clarification document (Energy Strategy Report Clarification (Ridge) - dated 21<sup>st</sup> December 2018) has been produced and is submitted in response to questions which have been raised by a third party regarding the content of the Energy Strategy (dated 30<sup>th</sup> November 2018), more particularly a considered lack of specific detail regarding the design of the building.

The document contains extracts from sections of the submitted Energy Strategy to evidence the specific design in terms of energy efficiency measures.

## **Highways / Access**

The scheme's appointed Highways & Transportation Consultants (Curtins) have been in direct dialogue with the Local Highways Authority with a view to addressing any outstanding matters.

Attached to this submission is a revised drawing (dwg No. 69753-CUR-00-00-DR-TP-001-02) which shows updated tracking details to evidence that a refuse collection vehicle could safely manoeuvre into, and out of, the site.

In addition the pedestrian crossover at the entrance to the site is shown in the Entrance Crossover Drawing, provided by MBCE (Dwg no. S2832-SK-C0-01 RevP1), which is submitted to show the position of the agreed crossover.

## **Flood Risk**

The Environment Agency submitted comments to the LPA on 21<sup>st</sup> December regarding the proposed development and made specific reference to the submitted Flood Risk Assessment. The scheme's appointed consultant (Mark Brock Consulting Engineers) have provided a response document to each of the points made by the EA, and this document (Supplementary Information to the MBCE Flood Risk Assessment Rev O October 2018) is submitted as part of the resubmission material.

Contained within this letter are the key points from the EA's response and MBCE's response to these issues. Please refer to the full document for the detailed response.

<b>Environment Agency Comments</b>		<b>Applicant's response</b>
Flood Risk	<p>The site proposed for the student accommodation is currently a car park and falls within Flood Zone 2 (Medium Probability as defined in Table 1 of the Planning Practice Guidance) of the Widemarsh Brook, classed as an ordinary watercourse, on our Flood Map for planning.</p> <p>However, whilst the site is afforded protection by the Yazor Brook Flood Alleviation Scheme (FAS), the submitted Flood Risk Assessment</p>	<p>The site is located lower than the adjacent road, however the latest WSP / HCC modelled flood levels indicate an appropriate freeboard to the FFL is provided even in the event of FAS blockage. The flood maps provided indicate both the defended and undefended flood extends and the flood levels are provided within Table 2. The FRA and this addendum are based on the information provided by HCC and their representatives.</p>



	(FRA) WSP Memo has confirmed significant depths of flooding across the site should the FAS not be operational (Blockage).	
Sequential Test	<p>"The NPPF details the requirement for a risk-based ST in determining planning applications. See paragraphs 157-158 of the NPPF and the advice within the Flood Risk and Coastal Change Section of the government's NPPG.</p> <p>The NPPF requires decision-makers to steer new development to areas at the lowest probability of flooding by applying a ST. It states that 'Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding'.</p> <p>Further detail is provided in the NPPG; 'Only where there are no reasonably available sites in Flood Zones 1 or 2 should the suitability of sites in Flood Zone 3 be considered, taking into account the flood risk vulnerability of land uses and applying the Exception Test (ET) if required.</p> <p>Section 4.1 of the submitted FRA seeks to address matters relating to the ST and confirms that your Council are seeking to promote the parcel of land for the proposed use. We are aware of your aspiration for the ongoing development of this part of Hereford City which we have been historically engaged with. We would leave your Council to consider and address the ST issue. Providing you are satisfied, we would make the following comments on the FRA. We would expect a robust assessment of flood risk to be provided as detailed further below".</p>	<p>"As the site has been allocated within the local development plan, it is reasonably assumed that a sequential test has been successfully completed by the LPA. The combination of finished floor levels and storm water drainage provide a robust strategy to mitigate against flood risk. The above is alluded to within the EA response and stated within the FRA".</p>
Flood Risk Assessment	<p>"A FRA has been prepared by MBCE Projects Ltd (Rev 0 dated October 2018). However, it is currently inadequate as it does not fully address the flood risk to the site over the lifetime of the development from all forms of flooding. Also the FRA will need to demonstrate that flood risk elsewhere will not be increased as a consequence of the redevelopment of the site i.e. by impacting upon flood flow routes or reducing flood storage capacity. The FRA does contain some pre-application advice from Balfour Beatty in Appendix D and this also highlights that the site is located within an area of significant risk of surface water flooding. However, the FRA does not contain any modelled information for the Widemarsh Brook. We have not been approached for any pre-planning application</p>	<p>"The information summarised above and appended to this addendum provides detailed flood levels within the site for storm events including in the scenario of blockage. The original proposals are appropriate for the additional information and no change to finished floor levels or drainage proposals are proposed.</p> <p>The original ESG model assumes a higher FFL than what is currently proposed, so the flood storage capacity will not be reduced compared to the post-development model. Furthermore, the drainage proposals include restricted discharge flow and underground attenuation which provide betterment to current storm water flows offering an overall improvement.</p>

	<p>advice, both for this site or the wider ESG redevelopment, which may have helped ensure a more robust submission.</p> <p>The FRA is correct in that flood risk to this site will be reduced as a consequence of the upstream Yazor Brook Flood Alleviation Scheme (FAS) where some of the flows are diverted at Credenhill and channelled directly to the River Wye thus reducing flood risk in the City Centre. However, no undefended or defended modelled flood levels or flood maps have been included in the FRA or its appendices and it is therefore not possible to confirm whether the site is at flood risk including climate change impacts/a failure of the FAS and whether the finished floor level for the accommodation building is adequate".</p>	<p>The surface water flood risk indicated is due to the current lower plot levels adjacent to Station Approach Road. The proposed FFL, external levels and drainage proposals will mitigate against the risk of surface water flooding by directing any overland flows to the formal drainage network and the Welsh Water Sewer in Station Approach. Finally, due to the position and levels of the existing plot, it is assessed that no flood flow routes will be impacted by the proposed increase in finished levels".</p>
Development Proposals	<p>"The proposed use would be considered 'More Vulnerable' as defined in Table 2 of National Planning Practice Guidance (student halls of residence). The design flood (1% flood level fluvial, plus climate change allowances) should be used to inform the consideration of flood risk impacts, mitigation/enhancement and ensure 'safe' development. For 'more vulnerable' development (as defined within Table 2 - Flood Risk Vulnerability Classification, Paragraph: 066 Reference ID: 7-066-20140306 of the NPPG) e.g. housing, the FRA should use the 'higher central' climate change allowance (35%) as a minimum to inform built in resilience; but demonstrate/aim to incorporate managed adaptive approaches/measures for the 'upper end' allowance (70%) where feasible.</p> <p>The proposed building has 4 floors and the majority of the 178 student rooms are proposed on the upper floors. However, it is key that the finished floor level of the ground floor is set correctly so that internal flooding does not occur even in the worst case scenario e.g. extreme events or during a blockage of the FAS where more flows would be directed towards and inundate parts of the City Centre. This is of particular relevance as there are a number of student rooms, including 3 accessible studios, located on the ground floor. Appendix G of the FRA indicates that the ground floor will be set at 53.60mAOD but this is based on the assumption that there will be no flooding at the site. Our preferred ground floor use in the floodplain would be 'Less Vulnerable' uses - we note there are some uses of this type proposed in this application such as offices, launderette, storage etc.</p>	<p>"The WSP / HCC river modelling and flood levels quoted above reflect the 70% allowance for climate change, as requested in the EA comments. Furthermore, the rainfall strategy has been designed using 40% allowance for climate change. This is beyond the upper end allowance as defined by Table 3 within "Flood Risk Assessments: Climate Change Allowances" of the Planning Policy Guidance.</p> <p>The modelled flood level supports the previous statement that safe access and egress will be maintained even in the event of restricted performance of the FAS.</p> <p>Regarding ground floor accommodation, it is considered that the proposals are suitable for the current flood level information. Furthermore, the layout proposals include a ramp and disabled access from the development directly to Station Approach Road. This will provide secondary means of escape above the maximum, residual flood levels.</p> <p>It should be highlighted that in the WSP / HCC model the predicted 1 in 100 year flood level with 70% allowance for climate change within the site is 52.73mAOD. The proposed finished floor level (FFL) of 53.6mAOD provides a freeboard of 870mm, which is considered acceptable.</p> <p>In that model the residual 1 in 1000 year flood level for the site is identified as 53.42mAOD. Given that the probability of a 1 in 1000 year flood to coincide with an FAS complete blockage is extremely remote, the freeboard of 180mm provided is considered suitable.</p>



	<p>Paragraph 054 of the NPPG advises on how a development might be made safe from flood risk. Paragraph 039 provides detail on access and egress.</p> <p>Again the FRA states that safe access and egress will be maintained at design storm events but does not contain any modelled flood information to demonstrate this or show how this risk would be managed”.</p>	<p>The post development flood model identified in Figures 5 and 6 of the WSP document indicates no flooding for the design event and a flood level of 53.39mAOD for the scenario without the FAS. This is comparable to the pre-development value and the FFL proposal remains appropriate”.</p>
WSP Memo	<p>“As a subsequent compliment to the FRA, WSP have produced a brief memo for the application (dated 14 November 2018) and this had been based on modelling of the Yazor Brook and includes the latest climate change allowances (35 and 70% for residential accommodation). However, page 3 of the memo confirms that the modelling takes into account a diversion of the Widemarsh Brook to the west of the site and an attenuation basin of the new link road, neither of which has been constructed yet.</p> <p>Figure 1 shows that there is some flooding of the site when the FAS is in operation but depths of 900mm on the site in a 1 in 100 year plus 35% events when the FAS is blocked (Figure 2).</p> <p>One concern in terms of the memo is the section entitled 'Other Considerations'. This highlights the deficiencies of the Yazor Brook modelling, including not having undertaken sensitivity analysis, and questioning whether the flows used are accurate. It also questions the benefit of the FAS and suggests that blockage scenarios will need to be carried out on a plot by plot basis for the Edgar Street Grid (ESG) developments but this application does not contain any blockage scenarios and how this may affect the site. It also goes on to confirm that other sources of flooding have not been considered and in line with national planning policy FRAs should consider all forms of flooding. This all adds to our concerns with the FRA in that the application has been made prior to fully understanding flood risk in the location. This is a major development as it is for a 178 unit student accommodation but there are questions about the current suitability of the modelling and therefore sustainability of the development.</p> <p>The memo goes on to suggest different finished floor levels for the proposed student accommodation building. This includes 54.80mAOD which was used in the ESG modelling which would involve raising the site by up to 1.7 metres. However, as this is well</p>	<p>As outlined above this document was commissioned and provided by HCC to support this FRA and detailed planning application. The detailed model information was not available at the time of writing the FRA and the information is outlined above in this addendum.</p> <p>The proposed FFL of 53.6mAOD is considered appropriate as outlined above.</p> <p>It is agreed that as no flooding is identified for the design 100 year return period plus 35% the impact to third party land will be minimal. Furthermore, the ESG scheme flood model assumes raised levels within the plot, so the proposals will have no impact compared to the modelled flood extents.</p> <p>With regards to surface water flood risk, this has been addressed in the Flood Risk Assessment section of this addendum and the original FRA.</p> <p>Groundwater has been raised as a potential issue in certain areas within the wider ESG development area. However, due to the proposed land raising it is deemed that groundwater flood risk is minimal. Furthermore, it is considered that the presence of a Welsh Water sewer within the site and watercourse adjacent to the site will keep groundwater levels lower compared to adjacent land”.</p>

	<p>above all of the modelled scenarios (Table 2) it does continue that the finished floor level may be reduced and still be deemed appropriate. This could be either 54.0mAOD or 53.7mAOD. We presume these supersede the flood level of 53.60mAOD in the FRA? Clarification on floor levels is therefore required to inform a safe development.</p> <p>In addition to the above concerns, the FRA/memo does not assess the potential impacts of raising the site (ground levels) by over a metre. Presumably there will be no impact on fluvial flood risk if the site does not lie in the defended 100 plus 35% defended extent? What about other flood risk reduction measures? Impact with other sources? (We note Balfour Beatty suggested there is a significant risk of surface water flooding)".</p>	
Flood Warning and Evacuation Plan	<p>"The NPPG (paragraph 056) states that one of the considerations for safe occupation is whether adequate flood warning would be available to people using the development.</p> <p>We do not normally comment on or approve the adequacy of flood emergency response and flood evacuation procedures accompanying development proposals, as we do not carry out these roles during a flood. Our involvement with this development during an emergency will be limited to delivering flood warnings to occupants/users if they sign up to the Flood Warnings Service.</p> <p>The NPPG places responsibilities on LPAs to consult their Emergency Planners with regard to specific emergency planning issues relating to new development. We would advise that you take account of the guidance within NPPG Paragraph: 057 Reference ID: 7-057-20140306.</p> <p>We would advise that the Flood Warning and Evacuation Plan should identify a flood level that will initiate evacuation of people and vehicles, and any subsequent closure of the building/car park. This trigger level should be when the access/egress is still 'dry' i.e. flood-free, to avoid any question of what is an acceptable level of flood risk to occupants.</p> <p>The FRA does state that an evacuation plan, and the demonstration of safe access, should be agreed with Herefordshire Council, and their Emergency Planners which is especially important due to the current proposed ground floor sleeping accommodation. However there is no further detail within either the FRA or Memo; although separate correspondence from your colleague, Peter Gebbie</p>	<p>It is agreed that a suitable plan should be in place prior to the first occupation of the development including an agreed trigger level and safe access/egress above this level. This can be provided by a suitably worded condition which will be discharged at the appropriate time.</p>



	(Emergency, Resilience & Business Continuity Advisor) is noted".	
Flood Warning Contributions	<p>"Flood Warning Contributions: In this instance, to make the development acceptable in planning terms, the management of flood risk to the development, including safe access and egress, relies on the provision of our Flood Warning Service. We have a flood gauge on Three Elms. In this instance we would seek a contribution of £5,000, from the applicant, towards maintaining and operating this service.</p> <p>It is reasonable that planning permission should be subject to an appropriate unilateral undertaking requiring a financial contribution to provide this contribution to maintain and improve this service/system".</p>	"A suitable S106 contribution might be agreed to cover reasonable costs".

In light of the above response, it is considered that the issues raised in respect to Flood Risk have been responded to – in particular confirming : the source of the information and modelling used; the justification and principle of development of the site (it being a site identified for development); finished floor levels; safety / access ./ egress; and emergency evacuation measures and provisions.

The proposal is accordingly considered to be acceptable in this respect.

### **Drainage Strategy (Welsh Water)**

Following detailed dialogue with Dwr Cymru Welsh Water the Drainage Strategy and associated material has been amended.

Enclosed in the resubmission are a number of documents and drawings related to the Strategy, as listed below:

- Design Principles to Mitigate Construction in Proximity to Existing Sewer Rev 2 November 2018;
- Drawing Nos:
  - S2862-DS-100 RevP2 – Drainage Strategy Layout;
  - S2862-WWDS-101 RevP3 – Drainage Strategy Layout – Option with Reduced Attenuation & Increased Outfall Rate;
  - S2862-SKWWS03 Rev P1 – Existing Welsh Water Sewer Showing Building and Area Zone Plan;
  - S2862-SKWWS01 RevP7 – Proposed Piling Solution;
  - S2862-SKWW02 RevP7 – Building Layout and Existing Dwr Cymru Sewer.
- Method Statement – Repair and Protection of Welsh Water Existing Sewer (dated 16<sup>th</sup> November 2018) including Appendices A,B,C and D.
- Construction Environmental Management Plan (CEMP) (Construction Phase SHE Plan Hereford Student Accommodation Rev 2).

It is understood as a result of dialogue and meetings with Welsh Water that they are content with the scheme, and will support the scheme subject to conditions. Feedback from DCWW to this on-going dialogue is, in summary, as follows (which will be confirmed through a formal response to the re-consultation exercise in due course):

- DCWW have reviewed the principles and are content with the proposals – as a consequence we would be able to support the scheme through the planning process subject to the appropriate conditions being in place;
- DCWW are also content for the surface water discharge rate to be retained as per existing run off, which enables a reduction in the onsite attenuation;
- DCWW's only recommendation is that sheet piling is provided adjacent to the attenuation tank being retained so that, in the event of us excavating, the tank would remain in place and protected.;
- As for next steps we are content to offer the Planning Authority further comments by responding to a fresh consultation; and
- Any management required for the works at implementation stage can be dealt with as part of future discussions to address the relevant planning conditions.

In light of the above it is considered that this element is satisfactorily addressed.

### Archaeology

The consultation response from the Archaeological Officer (dated 26<sup>th</sup> October 2018), sets out a number of comments. These, and the applicant's responses to those issues that necessitate a response, are summarised below:

Environment Agency Comments		Applicant's response
Overall	The general content and conclusions of the submitted Heritage Assessment are sound.	Noted
	I am also of the view that sufficient knowledge already exists regarding the potential below ground impact of the development for there to be no requirement for (e.g.) a field evaluation in this particular case. In the circumstances I consider that sufficient good information is already available regarding the significance of the heritage assets that would be affected in the environs of the development. In truth, no more raw data is needed at this stage, and it would be disproportionate to seek it".	Noted
Relationship to surrounds	the proximity of the "tall structure so near to a historic access point for the City and within eye shot of a number of Conservation Areas". The Officer advises that he would defer to any comments the Principal Conservation Officer makes in those respects.	Since the receipt of these comments extensive additional discussion and liaison has taken place with the Conservation Officer, and the scheme has been amended (as is discussed in detail as part of this submission).  Accordingly this issue is addressed elsewhere in this submission.



## **Need For The Development and The Associated Benefits The Scheme Will Deliver**

The following statement has been provided by Hereford College of Arts regarding the design ethos for the development, along with the benefits the development will deliver for higher education in Hereford and the economic benefits for the wider City. The statement also expresses the College's commitment to the showcasing of student artwork on site:

*"The ambition for this project is that Station Approach becomes a beacon building for Hereford, speaking to both the city's past and future. The site couldn't be better for HCA - mid way between its teaching and learning campuses and the city centre, it will give residential students easy access to all the social and cultural resources of the city and help connect them with the wider community.*

*Hereford's lack of purpose-built student housing puts off students who might otherwise move to the city for their higher education; it is hindering both the growth of HCA and the launch of NMiTE and a barrier to all the benefits a growth in student and graduate population would bring to the city's economic and cultural future.*

*Throughout the design process we have consulted closely with HCA and NMiTE to ensure that student well-being is at the heart of the layout and management of the building. This engagement has included a design workshop with students from both institutions actively involved in developing the design – a process that will continue. As part of that, there are exciting proposals for a large and high quality communal area on the ground floor which will include smaller zones for group and independent study, personal reflection, performance spaces and a fitness gym, games and entertainment zones and with the flexibility to quickly adapt the space for degree shows and exhibitions.*

*We have also focused on ensuring the building remains economic and affordable with room rental at the bottom end of that charged nationally for quality purpose-built accommodation in other student cities.*

*Importantly the building has been designed with the display of creative artwork internally and externally as intrinsic to the overall plan. This includes the ground floor social, exhibition and performance space that will always be visible through the front glazing and able to be opened to the public for events.*

*There will be large external display zones at either end of the building while, subject to obtaining consent and ongoing public consultation, external projection mapping can be used to bring the front of the building alive with still or moving images to celebrate local and national occasions. Additionally, plinths for 3D sculpture will be included on the open terrace in front of the building along with street furniture, some commissioned from the HCA Artist Blacksmithing course. With these internal and external flexible exhibition spaces built into the core design, the approach is entirely different to the 'add on a bit public art at the end' of some developments.*

*We are excited about the way creative display areas of the building will be used to express some of the distinctive features of Herefordshire, past and present, as HCA is already doing in the 'Showcase of Herefordshire' currently being designed for the European Parliament in Brussels".*

In summary, the proposed development is key to Hereford being able to retain and further develop a competitive Higher Education offer. The enhancement of the Higher Education offer will, of course bring economic and social benefits to the wider City.

Hereford College of Arts has been seeking a purpose-built student accommodation scheme for a number of years. The College are confident that this development will greatly increase their ability to



attract new applicants and grow their degree student community to 680 over the next five years. This aspiration / target is published in HCA's 'Strategy Overview 2018 – 2023' document.

The scheme is also key to the proposals to establish NMiTE as a new university in the City targeting students for vocational and employment based Engineering programmes with degrees initially validated by the University of Warwick. The proposed accommodation is likely to be shared between HCA and NMiTE initially.

The proposed development will also play a vital role, and a catalyst in the unlocking of development sites along the new Link Road, in accordance with the Council's aspirations. The development would also assist with bringing young people into the City centre to support its economic viability and the evening economy.