

Re PDE and development application LA05/2022/0033/F. We have further serious concerns.

Are you aware:

According to the PDE Guidance notes produced by NIW in November 2022 (<https://www.niwater.com/sitefiles/>) and with the knowledge that Drumbeg WwTw was "At Capacity" in March 2023 and in June 2023 there were network problems associated with Drumbeg WwTw, in August 2023 NIW informed the Case Officer that there was capacity for 17 new houses.

This was also during the time when the PDE had lapsed from February 2023.

Furthermore, in December 2023 with the PDE lapse continuing and with the continuing problems in the Drumbeg network and the Capacity issues at the Drumbeg WwTw, NIW issued a new PDE for which the Developer paid £300 +vat resulting in the issuing of a further PDE the 2 previous PDE's having lapsed.

No Impact Assessment was requested by NIW from the Developer.

Also, the Foul Sewerage design for Residential developments needs to show the proposed flows for gravity foul sewer of 4,000L per unit dwelling per 24 hrs. For 17 houses = 68,000L per day. This volume is planned to enter a combined sewer on Quarterlands Road with no request from NIW for off-setting of Storm Water of at least an equivalent volume proximal to the connection point, to allow this large volume of foul sewerage to enter the combined pipe.

With the present flooding on Quarterlands Road following on the recent storms and consulting the Flood Maps for [Quarterlands Road \(2023\)](#) it is noted that upwards on .3 m or 1 Foot water presently resides. Add to this the probability of back up of foul sewerage with the additional 17 houses that mix will be toxic at least to the present residents.

In addition, the present Surface water runoff from the Building site if the proposed Hydrobrake malfunctions, will add an additional large volume of water exiting via Chamber S1 unto the Quarterlands Road. This additional volume is caused by the new Hard surfaces on site with total removal of the large soakaway presently provided for by the 1.1Ha of Scrubland and the roots of the 165+yr old Hawthorn trees and Hedge (see Atkins Calculations)

NIW also raises in these Guidance notes, the question of Fire Protection Requirements which in a Cul de sac development where the total road width is 6M and with fixed road parking spaces further reducing the road width, the attendance of a Fire engine would all but block the remaining road space. Therefore, evacuation of people under these circumstances could be hazardous. Presently the Water Hydrants are out with the site. A Fire Risk assessment should be carried out for the site.

The Final paragraph. " The PDE Response will be valid for a period of 18 months and should formal approval to make connections to the public water and sewerage networks not have been granted by NI Water within this timescale, a further PDE will require to be submitted to ensure that capacity currently identified as being available to serve this proposal, still exists."

Did NIW check this when the new application of PDE3 was made by the Developer in December 2023? At that time Drumbeg WwTw was over capacity with additional network problems and no plans for NIW to upgrade the network system and the Drumbeg WwTw within the next 10 years?

We would ask that you tell us how planners have dealt with the discrepancies and inconsistencies between NIW and the developers and how you monitor and ensure correct safe planning process is followed.

Regards,

Quarterlands Group