

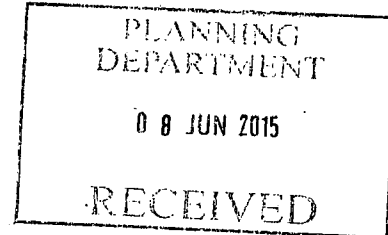
[REDACTED]

**From:** Mark Peacock  
**Sent:** 08 June 2015 10:59  
**To:** Planning  
**Subject:** FW: S6/2015/0524/FP - Woodfield (Blue Moon), Woodfield Lane, Brookmasn Park  
**Attachments:** S620150524FP - Woodfield (Blue Moon) Formal Application Response letter template SW.doc

Please record the attached consultation response from HCC as the Lead Local Flood Risk Authority.

Kind regards

**Mark Peacock BA (Hons) MSc**  
**Senior Development Management Officer**  
Welwyn Hatfield Borough Council



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**From:** Fiona Lai [<mailto:Fiona.Lai@hertfordshire.gov.uk>]  
**Sent:** 08 June 2015 10:49  
**To:** Mark Peacock  
**Subject:** S6/2015/0524/FP - Woodfield (Blue Moon), Woodfield Lane, Brookmasn Park

Hi Martin,

Please find enclosed attachment with our comments as I'm unable to load the comment into the Dataspace website.

Regards,  
Fiona

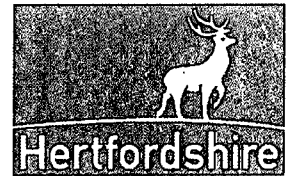
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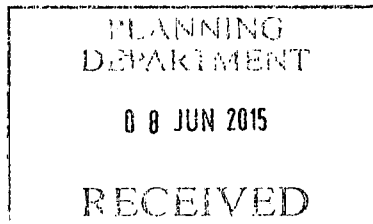
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MP RAR

Environment Director & Chief Executive:  
John Wood



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Contact Sophie Williamson  
Tel 01992 556492  
Email [FRMConsultations@hertfordshire.gov.uk](mailto:FRMConsultations@hertfordshire.gov.uk)

Date 05<sup>th</sup> June 2015

RE: **S6/2015/0524/FP - Woodfield (Blue Moon), Woodfield Lane, Brookmans Park**

Dear Martin Peacock

In the absence of an acceptable FRA we object to the grant of planning permission and recommend refusal on this basis for the following reasons:

The FRA carried out by ARK Environmental Consultancy Ltd dated 29 April 2015 submitted with this application does not comply with the requirements set out in the Planning Practice Guide (as revised 6 April 2015) to the National Planning Policy Framework. The submitted FRA does not therefore; provide a suitable basis for assessment to be made of the flood risks arising from the proposed development.

In order for the Lead Local Flood Authority to advise the relevant local planning authority that the site will not increase flood risk to the site and elsewhere and can provide appropriate sustainable drainage techniques, the following information is required as part of the flood risk assessment;

1. Provide pre and post development surface water run-off rate calculations and volumes to demonstrate no increase in flood risk to the site and the surrounding area
2. Provide information including the location on the proposed method of discharge of surface water run-off
3. Assessment of existing overland surface water flow routes to demonstrate there will be no increase in flood risk to the site and the surrounding area
4. Plan showing the location of the proposed drainage scheme, including any SuDS and pipe runs to demonstrate the feasibility of the proposed drainage scheme
5. Details of existing drainage within the site and its condition
6. Assessment of existing ground conditions and permeability of the site

## **Overcoming our objection**

At the moment the existing site is predominantly greenfield with existing dilapidated barns and stables. It should therefore be assumed that any existing drainage for the site may not function and areas of existing hardstanding may now be overgrown.

The FRA should ensure that the proposed location of the proposed residential home is appropriate as it is proposed to locate the property on one of the lowest parts of the site with the land sloping from west to east towards the property. The FRA should assess and demonstrate that there is no risk from existing overland flow routes and is able to provide appropriate flood resilience and mitigation against this risk, including considering an alternative location within the site.

As this is for a new development, formal drainage will need to be provided to drain the property. Therefore it is important that the proposed and existing greenfield run-off rates are assessed and appropriate SuDS can be implemented to cater for any increase in rates and volumes and provide other benefits such as water quality, biodiversity and amenity. The proposed drainage should be provided on a plan showing the location of any SuDS measures and pipe runs.

It is stated within the FRA that it is intended to discharge the surface water to the existing land. We assume this is through the method of infiltration, however no infiltration tests in accordance with BRE 365 have been provided to demonstrate that this is feasible. If infiltration tests cannot be provided, an alternative scheme should be demonstrated based on above ground attenuation with an appropriate discharge point to the nearest watercourse or if not feasible to the nearest public sewer with confirmation of permission to connect to the sewer from the relevant water authority.

For further guidance on HCC's policies on SuDS, HCC Developers Guide and Checklist and links to national policy and industry best practice guidance please refer to our surface water drainage webpage

<http://www.hertsdirect.org/services/envplan/water/floods/surfacewaterdrainage/>

## **Informative to the LPA**

The applicant can overcome our objection by submitting an FRA which covers the deficiencies highlighted above and demonstrates that the development will not increase risk elsewhere and where possible reduces flood risk overall.

We ask to be re-consulted with the results of the FRA. We will provide you with bespoke comments within 21 days of receiving formal re-consultation. Our objection will be maintained until an adequate FRA has been submitted.

Yours sincerely,

Sophie Williamson