

13 May 2021

David Elmore
Welwyn Hatfield Borough Council
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Dear David Elmore

RE: HE Response – 6/2020/3222/MAJ, Former Volkswagen Van Centre, Comet Way, Hatfield, AL10 9TF

Thank you for sending the letter from Highways England (HE) dated 21 January 2021, regarding the planning application reference 6/2020/3222/MAJ, Former Volkswagen Van Centre, Comet Way. Please see below our response to each of the HE comments:

HE comment

I have received additional comments from Highways England's service providers on drainage matters in the planning application. After review of the Drainage Statement, it is noted that exceedance routes have been indicated in the design, and it is proposed that exceedance flows up to the 1 in 100 year event will be managed on site. However, it is not clear what happens to the flow in events greater than 1 in 100 years. (Section 4.5.8).

Could the applicant please provide further information on how they intend to manage flow in events greater than 1 in 100 years.

Stantec response

As detailed in 4.5.8 of the Drainage Statement, to ensure that in an exceedance event any flooding does not affect properties or discharge from the development, flows up to the 1 in 100 (1.0%) annual probability **plus climate change event** will be managed in the drainage system.

The surface water drainage and the supporting drainage calculations show no flooding occurs up to this event. If any flooding were to occur (i.e in an exceedance event or due to lack of maintenance) this will be accommodated onsite by incorporating site levels which are designed to direct flows away from the buildings and towards areas such as car parking or formal landscaping where temporary shallow flooding can occur.

This is in accordance with the Lead Local Flood Risk Authority (LLFA) drainage guidance documents.

The Hertfordshire County Council LFRMS 2, The strategy for the management of local sources of flooding paragraph 4.6.5 Managing Overland Flow Routes states

“Where a site or its immediate surroundings have been identified to be at flood risk, all opportunities to reduce the identified risk should be explored. New development should be designed to take full account of any existing

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flood risk, irrespective of the source of flooding. This includes any existing or predicted flow routes entering the site. The information should indicate areas for flood storage and/or exceedance and the volumes that need to be managed. These volumes can be accommodated within the drainage system itself or within other designated areas within the site for conveyance and storage.”

Policy 17: Development sites along natural flow routes and in existing flood risk areas

Where a development alters the natural flow route and/or is located in an area with existing flooding issues or a high risk of potential flooding; proposals must demonstrate the management of any existing and predicted overland flows entering the site from adjacent areas for all rainfall events up to and including 1 in 100 year plus climate change event.

The LLFA Summary Guidance for Developers, for the Management of Surface Water Drainage also states as follows regarding surface water drainage:

2: Storage volumes

“Storage volumes for all events up to a 1 in 100 chance in any year including an allowance for climate change storm event will be provided on site utilising above ground storage where practicable. The site will not flood from surface water up to a 1 in 100 year chance in any year including an allowance for climate change event, OR surface water flooding will be safely contained on site up to this event, ensuring that surface water runoff will not increase flood risk to the development or third parties. There should be no flooding within the site for up to and including the 1 in 30 year rainfall event.”

Both LLFA guidance documents have been developed based on the requirements of National Policy including the Flood and Water Management Act.

Accommodating any exceedance beyond the surface water drainage design event is therefore considered to be a departure from both the LLFA and National Policy and could potentially increase the flood risk to the end users of the site.

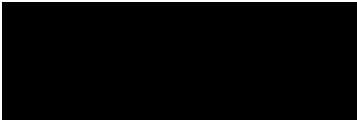
The site and local area have not been identified as being at a high risk of potential flooding, nor is there existing flood risk issues identified, which is addressed in the supporting Flood Risk Assessment and Drainage Statement, provided in consultation with stakeholders.

Any overland flows generated above the 1 in 100 plus 40% climate change event would likely flow, as with the current existing situation, to lower external areas of the site and follow existing overland flow routes along Goldsmith Way.

The development proposals also provide a significant betterment in on-site flooding generated by surface water drainage, compared to the existing drainage situation. Our calculations have shown in the existing scenario flooding is likely to occur during and above the 1 in 30 standard, this flooding is likely to contribute to overland flow to offsite areas of Comet Way and Goldsmith Way. Discharge rates have also been significantly reduced, by 96% and more, generating wider betterment which will reduce the surface water flood risk within the local area.

We hope the information contained assists the officer and alleviates any concerns on overland flows. We also respectfully request the officer carefully considers the requirements of national policy and the practicality of requesting management of flows over and above the recommended design event currently accommodated on site and the significant benefits afforded by the surface water drainage strategy which has been developed for this site.

Yours sincerely



Stephanie Knowles
Associate Civil Engineer
on behalf of Stantec UK Ltd