

Mr David Elmore  
Local Planning Authority  
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The Campus  
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HERTFORDSHIRE  
AL8 6AE

**Lead Local Flood Authority**  
**Post Point CHN 215**  
**Hertfordshire County Council**  
**County Hall, Pegs Lane**  
**HERTFORD SG13 8DN**

Contact Anna Mierzejewska  
Email [FRMConsultations@hertfordshire.gov.uk](mailto:FRMConsultations@hertfordshire.gov.uk)

Date 28 October 2022

Dear David,

**RE 6/2022/1853/MAJ - Eisai Europe Limited, European Knowledge Centre, Mosquito Way, Hatfield, AL10 9SN**

Thank you for your consultation on the above application for the construction of a 4,012sqm extension to the existing warehouse space (Use Class E) with associated plant and works including the relocation of a bicycle shelter, re-routed internal access road and landscaping at the Eisai Europe Limited site in Hatfield.

It is understood that the application is to seek a full planning permission for the extension and redevelopment of existing commercial buildings / warehousing.

We have reviewed the information submitted by the applicant in support of the planning application. However, unfortunately the information provided to date does not provide a suitable basis for an assessment to be made of the flood risk arising from the proposed development. **Therefore, we object** to the above planning application until additional information is provided to show that the site is not at risk of flooding or will not adversely affect flood risk elsewhere. We note that it is possible that the start of a document including the drainage strategy has not been made available, as only Appendix B, C and D appear to be uploaded to the planning portal (when the FRA contents page only contains Appendix A and B).

In order for the Lead Local Flood Authority to advise the relevant local planning authority that the proposal will comply with NPPF, where it will not increase flood risk to the site and / or elsewhere, plus provide appropriate sustainable drainage surface water management, the following information is needed:

1. Discussion on how the new extension building will be manage the risk of surface water flooding from elsewhere on the site.
2. A SuDS Drainage strategy and detailed design.

3. Evidence of how the application considers the drainage hierarchy and 4 Pillars of SuDS including a Water quality assessment according with SuDS Manual Section 26.
4. Surface water overland flow exceedance plans.
5. Details of who will maintain the drainage network including a Maintenance Plan and Maintenance Schedule.

### **Overcoming our objection**

1. Provision of evidence to show that the surface water flood risk noted within the FRA will not impact the extension. This may include consideration of ground levels around of the existing and proposed buildings, access points to buildings and how the existing drainage network will interact with the new extension (e.g. surcharge of a network designed to out of date standards).
2. It is acknowledged that the preliminary Drainage Strategy plans and pre/post development runoff rates and storage calculations have been provided. It is requested that a full SuDS Drainage Strategy and detailed design is also provided to include the following:
  - a. Evidence of how the Drainage Hierarchy was applied in line with the Defra Non Statutory Technical Standards, industry best practice and HCC SuDS Policies within LFRMS2. This includes evidence on why infiltration is not possible for the extension drainage network. Such as evidence of ground conditions / underlying geology and permeability including BRE Digest 365 infiltration tests as referred to as undertaken for the site in the submitted Flood Risk Assessment. It may also include evidence of any ground contamination or source protection zones which is highlighted by the Environment Agency to prevent infiltration and deep infiltration soakaways as a surface water drainage disposal location. It is noted that Thames Water have highlighted that there are capacity issues in the sewer system due to ingress of groundwater.
  - b. Commentary on why the rainwater harvesting has not been included or cannot be provided.
  - c. Evidence of how the 4 pillars of SuDS is applied including assessment of water quality (in line with the SuDS Manual – Section 26) and inclusion of biodiversity or amenity benefits.
  - d. Pre and post development runoff rates and volumes with evidence on how this is calculated. This would include pre development greenfield runoff rates and volumes.
  - e. Three different drainage strategy options have been provided. No definite solution has been identified and no discussion around the different approaches was undertaken with Thames Water. As this is a full planning application a single drainage design should be submitted that identifies specific details of the design including conveyance and storage elements of the network. Quick Storage estimate is not acceptable. Details of pre and post development runoff rates and volumes should be evidenced. We request that the discharge is limited to greenfield runoff rates and volumes unless lower rates to prevent surcharge of the existing drainage system is required. Evidence of this assessment should be submitted and a in principal agreement with Thames Water if the development will increase the current discharge or creating a new connection to their network.

- f. Full detailed drainage layout plan showing the proposed SuDS features, any associated manhole cover and invert levels, proposed ground levels, pipe sizes and gradients, all on-line controls, on-line and off-line storage structures, water quality mitigation and outfall details.
  - g. Provision of supporting calculations to demonstrate that there is no flooding of the drainage network at the 1 in 30 year rainfall event and that no flooding occurs of building at the 1 in 100 year plus climate change event. All supporting calculations and modelling scenarios should use FEH2013 rainfall parameters and include a summary of results, showing all the modelling criteria and summary network results for critical design storm events. The results will show maximum water level, flow and velocity.
  - h. A plan will be supplied to show any extent and depth of any surface flooding anticipated. All drainage modelling information shall be shown on the plan including all corresponding numbered nodes and drainage network model labels and details
  - i. Comment will also be provided to show how freeboard has been provided to any finished ground floor levels of buildings or essential infrastructure (e.g., plant rooms)
3. Regarding Infiltration testing, Flood Risk Assessment referred to the ground investigation undertaken by Applied Geology for the original Project Eisai before the existing buildings were constructed in 2006, however the LLFA cannot locate these documents on the planning portal.
  4. A plan showing overland exceedance routes in the event of a failure of the drainage system or storm event in excess of the 1 in 100 year return period with the appropriate allowance for climate change should be provided.
  5. Details of the proposed construction phase drainage control measures to ensure that during construction, and prior to the main drainage system being installed and operating, that there is no increase in flood risk to adjacent properties or the public highway or pollution generated. These proposals must consider a reasonable plan of how water will be managed and consider where the most vulnerable receptors are e.g. adjacent dwellings or the water environment
  6. Confirmation of required maintenance of any SuDS features and structures and who will be maintaining or adopting these features for the lifetime of the development.

### **Informative and Advice**

For further advice on what we expect to be contained within the FRA to support a planning application, please refer to our Developers Guide and Checklist on our surface water drainage webpage <https://www.hertfordshire.gov.uk/services/recycling-waste-and-environment/water/surface-water-drainage/surface-water-drainage.aspx> this link also includes HCC's policies on SuDS in Hertfordshire.

Please note if, you the Local Planning Authority review the application and decide to grant planning permission, you should notify the us, the Lead Local Flood Authority, by email at [FRMConsultations@hertfordshire.gov.uk](mailto:FRMConsultations@hertfordshire.gov.uk). This is for our records should there be

any subsequent surface water flooding that we may be required to investigate as a result of the new development.

Yours sincerely

Anna Mierzejewska  
SuDS and Watercourses Support Officer  
Environment & Transport and Sustainable Growth

The following documents were reviewed by LLFA during preparation of this response:

- Flood Risk Assessment by AECOM Limited, Ref: ESL-ACM-XX-XX-RP-C-0001, dated 22 July 2022
- Proposed Location Plan by AECOM Limited, Ref: ESL-ACM-XX-ZZ-DR-A-00310, rev. P05, dated 23 August 2022