

Ms Ashley Ransome
Local Planning Authority
Welwyn Hatfield Borough Council
The Campus
Welwyn Garden City
Hertfordshire
AL8 6AE

Lead Local Flood Authority
Post Point CHN 215
Hertfordshire County Council
County Hall, Pegs Lane
HERTFORD SG13 8DN
www.hertfordshire.gov.uk

Contact Jessica Christie
Email FRMConsultations@hertfordshire.gov.uk

Date 10 August 2023

Dear Ashley

RE: 6/2023/1347/COND – Land to the North-East of King George V Playing Fields, Northaw Road, East Cuffley, Hertfordshire, EN6 4RD

Thank you for your consultation on the above site, received on 6 July 2023 for the submission of details pursuant to condition 19 (Flood Risk Assessment), on planning permission S6/2015/1342/PP for the residential development of up to 121 dwellings, associated infrastructure, and a change of use from agricultural land to an extension of the King George V playing field.

We are aware that applications 6/2023/1346/COND and 6/2023/1352/VAR, both related to this site, have been submitted for the discharge of condition 6 (Surface Water Drainage) and condition 3 (Parameter Plan approval). The applicant should be aware that condition 19 (Flood Risk Assessment) cannot be resolved until condition 6 (surface water drainage) has been resolved, and all plans submitted as part of condition 3 (parameter plan approval) are consistent with plans submitted as part of condition 6 and condition 19.

We **object** to this application, due to the insufficient technical information in support of the discharge of condition. Due to the continued objection of condition 6 (surface water drainage) and inconsistencies present in parameter plans subject to condition 3 (parameter plan approval). We will review the conditions set by condition 19, when objections highlighted in condition 6 (surface water drainage) have been resolved. Please ensure that any changes made to the drainage strategy as part of condition 6 should be carried forward and updated in the Flood Risk Assessment (10710 FRA01).

Condition 19 States:

The development hereby permitted must be carried out in accordance with the approved Flood Risk Assessment prepared by Brookbanks reference 10710 FRA01 Rv0 dated 11 June 2021 and the following mitigation measures detailed within the Flood Risk Assessment:

- *Limiting the surface water run-off generated by the critical storm events so that it will not exceed the surface water run-off rate of 8.2 l/s during the 1 in 100-year event plus 40% climate change event.*
- *Providing storage to ensure no increase in surface water run-off volumes for all rainfall events up to and including the 1 in 100 years + climate change event providing a minimum of 1,494 m³ (or such storage volume agreed with the LLFA) of total storage volume in attenuation basin and swale.*
- *Discharge of surface water from the private drain into the ordinary watercourse south of the site.*

The mitigation measures shall be fully implemented prior to occupation and maintained in accordance with the timing / phasing arrangements embodied within the scheme, or within any other period as may subsequently be agreed, in writing, by the Local Planning Authority.

REASON: To reduce the risk and impact of flooding by ensuring the satisfactory storage and disposal of surface water from the site; and to ensure surface water can be managed in a sustainable manner in accordance with Policy R7 and R10 of the Welwyn Hatfield District Plan 2005; Policy SADM14 of the draft Local Plan Proposed Submission August 2016; and the National Planning Policy Framework.

Informative

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.

Erection of flow control structures or any culverting of an ordinary watercourse requires consent from the appropriate authority, which in this instance is Hertfordshire Lead Local Flood Authority and the Local Council. It is advised to discuss proposals for any works at an early stage of proposals.

In December 2022 it was announced FEH rainfall data has been updated to account for additional long term rainfall statistics and new data. As a consequence, the rainfall statistics used for surface water modelling and drainage design has changed. In some areas there is a reduction in comparison to FEH2013 and some places an increase (see [FEH22 - User Guide \(hydrosolutions.co.uk\)](https://www.flooded.co.uk/FEH22-User-Guide)). Any new planning applications that have not already commissioned an FRA or drainage strategy to be completed, should use the most up to date FEH22 data. Other planning applications using FEH2013 rainfall, will be accepted in the transition period up to the 1st April 2023. This includes those applications that are currently at an advanced stage or have already been submitted to the Local Planning Authority. For the avoidance of doubt the use of FSR and FEH1999 data has been superseded by FEH 2013 and 2022 and therefore, use in rainfall simulations are not accepted.

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.

Yours sincerely

Jess

Jessica Christie
SuDS and Watercourses Support Officer
Growth & Environment

Annex

The following documents have been reviewed, which have been submitted to support the application;

- Surface Water Drainage Report (Rev 5), Prepared by Brookbanks, Ref: 10929/SWD rev4, 28 June 2023.
- Surface Water Flood Modelling Technical Note (Rev 2), prepared by Brookbanks, Ref 10929/TN01, Rev 2, 28 June 2023.