

Mr David Elmore
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, Hertfordshire SG13 8DN
www.hertfordshire.gov.uk

Contact Flood Risk Management Team
Email FRMConsultations@hertfordshire.gov.uk

Date 18 January 2024

Dear Mr Elmore

RE: 6/2023/2030/COND - 71 Station Road Cuffley, EN6 4HG

Thank you for your consultation on the above site, received on 3 October 2023 for the submission of details pursuant to Condition 4 (surface water drainage), 5 (materials of external surface and refuse and recycling storage building) and 11 (secure cycle, refuse and recycling storage) on planning permission 6/2021/0456/MAJ for the (demolition of existing car showroom and erection of three storey block of flats comprising of 9 No 2 bedroom flats & 3 No 1 bedroom flats, with associated access, parking, amenity space and landscaping) which was granted permission on 12 June 2023.

We have reviewed the application as submitted and wish to make the following comments.

Our comments are in relation to Condition 4 only as Conditions 5 and 11 are outside of the remit of the LLFA. We understand that information has been submitted relating to planning application 6/2023/1354/COND whereby the LLFA responded on 14 July 2023. We understand that this consultation has been disregarded in light of this new consultation (6/2023/2030/COND).

Based on the information that has been provided in support of application 6/2023/2030/COND, the LLFA **recommends that Condition 4 is discharged.**

- a. The applicant has provided information relating to infiltration testing undertaken in April 2022 confirming that the ground is clay therefore, infiltration has been proven unviable. **No further information is required.**

- b. The applicant has shown that the system will discharge at a rate of 2.0l/s for all events up to and including the 1% AEP plus 40% climate change allowance design event. **No further information is required.**
- c. Detailed engineered drawings of the proposed SuDS features have been provided in the drawing reference 2592-05 Rev C, dated 28 April 2023. **No further information required**, however please see informative at the end of this letter.
- d. The LLFA appreciates the applicant's updated submission of the hydraulic modelling calculations, which resolve points 1-5.
 - 1. Previously, the applicant used FSR as the rainfall methodology. We note that FEH 2013 has now been used as the rainfall methodology for all modelling calculations to ensure efficient storage capacity of the network. **No further information is required.**
 - 2. **No further information is required.**
 - 3. We understand the MADD factor has been revised to 0. **No further information is required.**
 - 4. Climate change has been included on the 3.33% AEP calculations in accordance with the latest climate change guidance for flood risk assessments. **No further information is required.**
 - 5. The LLFA notes that there is no Flood Risk for pipe 1.003 within 1% AEP plus 40% climate change within the updated calculations. **No further information is required.**
- e. Half drain times for all storage features are within 24 hours. **No further information is required.**
- f. The applicant has permeable paving within the design, providing treatment to runoff generated on the car parking area. **No further information required.**
- g. We understand that silt traps have been included in the design details (cross section) of the waving cellular storage system for protection of tanked elements on DWG no. 2592-05, Rev C dated 02 February 2021. **No further information is required.**
- h. The applicant has submitted a SuDS Maintenance Plan which confirms a management company will be responsible for maintaining communal SuDS. Details are provided confirming how each SuDS feature will be maintained. **No further information is required.**

Informative to the LPA

Regarding part C of Condition 4, we recommend that some further details could be provided at this stage. As a discharge of condition application, it would be beneficial for the applicant to confirm the route of the Thames Water surface water sewer as it should be known at this stage. Its alignment, diameter and invert level should be understood at this stage in the process.

We highly recommend that the LPA confirms the management company responsible for maintaining the SuDS features on site.

Please note if, you the Local Planning Authority review the application too approve this applicaiton, you should notify the us, the Lead Local Flood Authority, by email at FRMConsultations@hertfordshire.gov.uk.

Yours sincerely

Flood Risk Management Team
Growth & Environment

Annex A

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

- Decision Notice, by Welwyn Hatfield, 12 June 2023, and Ref: 6/2021/0456/MAJ.
- Application for Approval of Details Reserved by Condition, by Salvatore Zaffuto, and 2 October 2023, Ref: 6/2021/0456/MAJ.
- Cover Letter prepared by MTC Engineering (Cambridge) Ltd, ref 6/2023/1354/COND – 71 Station Road, Cuffley, EN6 4HG, undated.
- Geotechnical Investigation prepared by Herts & Essex Site Investigations, ref CSG/14617, dated 18 April 2022.
- Infiltration Testing prepared by Dearman Developments Ltd dated 19 April 2022.
- MicroDrainage Calculations prepared by MTC Engineering (Cambridge) Ltd, ref 2592 – SWS Rev A dated 14 September 2023.
- MicroDrainage Calculations prepared by MTC Engineering (Cambridge) Ltd, ref 2592 – Storage Calcs 1 in 10 year dated 14 September 2023.
- Landscape Proposals prepared by Elizabeth Greenwood, DWG no. 1016.20.1A dated December 2020
- Indicative Drainage Plan prepared by MTC Engineering (Cambridge) Ltd, DWG no. 2592-05 Rev C dated 2 February 2021.

Annex B

Condition 4 is worded as follows:

Development must not commence until the final design of the drainage scheme has been submitted to and approved in writing by the local planning authority. The surface water drainage system will be based on the principles of the submitted Surface Water Drainage Strategy carried out by MTC Engineering reference 2592-DS-Feb 2021, dated February 2021.

The scheme shall also include:

- a. Detailed infiltration testing to be explored and carried out on site precommencement in accordance with BRE Digest 365 standards;*
- b. Should infiltration be proven unviable, the applicant should manage surface water via discharge into the existing Thames Water Surface Water Sewer at a maximum rate of 2.0l/s for all rainfall events up to and including the 1 in 100+40% climate change event;*
- c. Detailed engineered drawings of the proposed SuDS features including their, location, size, volume, depth and any inlet and outlet features including any connecting pipe runs. This should be supported by a clearly labelled drainage layout plan showing pipe networks. The plan should show any pipe 'node numbers' that have been referred to in network calculations and it should also show invert and cover levels of manholes;*
- d. All final corresponding calculations/modelling to ensure the scheme caters for all rainfall events up to and including the 1 in 100 year + 40% allowance climate change event;*

- e. *Provision of half drain down times for all storage features within 24 hours;*
- f. *Demonstrate appropriate SuDS management and treatment and inclusion of above ground features such as swales, filter drains, ponds and lined permeable paving, where possible;*
- g. *Silt traps for protection of any residual tanked elements; and*
- h. *Final detailed management plan to include arrangements for adoption and any other arrangements to secure the operation of the scheme throughout its lifetime.*

REASON: To prevent flooding by ensuring the satisfactory storage of and disposal of surface water from the site, in accordance with the National Planning Policy Framework.