

Environment Director & Chief Executive:  
John Wood



David Elmore  
Welwyn Hatfield Borough Council  
The Campus,  
Welwyn Garden City  
Herts  
AL8 6AE

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

Contact Julia Puton  
Tel 01992 556441  
Email [FRMConsultations@hertfordshire.gov.uk](mailto:FRMConsultations@hertfordshire.gov.uk)

Date 08 May 2017

**RE: 6/2016/2675/MAJ - Queenswood School, Shepherds Way, Brookmans Park, Hatfield, AL9 6NS**

Dear David,

Thank you for your re-consultation in relation to the above planning application for the erection of extension to existing sports hall, re cladding of existing roof and wall, following removal of existing mobile classrooms and increase parking provision from 85 to 102 approximately, at Queenswood School, Shepherds Way, Brookmans Park, Hatfield, AL9 6NS.

We understand this application seeks full planning permission for a major development, and we have assessed the Surface Water Drainage Strategy dated 13 April 2017, submitted in support to this application. However the information provided to date does not provide a suitable basis for an assessment to be made of the flood risks arising from the proposed development.

We therefore object to the grant of planning permission and recommend refusal on this basis for the following reasons.

Details of how surface water arising from a development is to be managed is required under the NPPF for all Major Planning Applications as amended within the NPPG from the 6 April 2015. Therefore for the LLFA to be able to advise the Local Planning Authority that there is no flood risk from surface water an application for full planning permission should include the following:

1. Full drainage strategy which includes a commitment to providing appropriate SuDS in line with the non-statutory national standards, industry best practice and HCC Guidance for SuDS.
2. Updated, detailed calculations for all rainfall return periods up to and including the 1 in 100 year plus climate change event including pre-development greenfield run-off

rates (for brownfield sites we require pre- and post-development run-off rates and volumes).

3. A detailed drainage plan including the location and size of all SuDS features, pipe runs and discharge points. If areas are to be designated for informal flooding these should also be shown on a detailed site plan. It should be noted that the drainage system should be designed to accommodate all surface water up to and including the 1 in 30 year rainfall return period. Please note all drawings to be the final design.
4. Updated, detailed modelled outputs of flood extents and flow paths for a range of return periods up to the 1 in 100 year plus climate change event and exceedance flow paths for surface water for events greater than the 1 in 100 year + climate change.
5. Evidence of ground conditions.
6. Details of any required maintenance of any SuDS features and structures and who will be adopting these features for the lifetime of the development.

### **Overcoming our objection**

1. We acknowledge that the applicant provided drainage strategy for the sports hall area. However, no details have been provided for the car park and the road. The access road should be managed appropriately as it is main access point. If there is no change to the access road, details of existing drainage should be provided.
2. We note that the applicant has provided Micro Drainage calculation. However, all the area inside the red boundary should be included in the calculations and modelling. We note as well that the applicant has proposed to limit the discharge. However, we would expect this limit to be set at the greenfield run-off rate. Where this is not possible a technical justification should be provided and a significant betterment should be proposed.
3. We acknowledge that the applicant has provided a surface water drainage strategy layout with a detention basin and a hydrobrake location. We require a drainage plan for all the development site. We would like to know what the size of proposed detention basin is. We require information about the exact location of the discharge point into the watercourse, what the condition of this watercourse is and if it has the capacity to take the additional flow from the proposed development. As the scheme proposes a detention basin, without information about the discharge point we are not able to establish the feasibility of the proposed drainage strategy.  
The drainage system should be designed to accommodate all surface water up to and including the 1 in 30 year rainfall return period. For the 1 in 100 year rainfall event informal flooding on the development site can occur, however it needs to be shown on a map and it cannot flood the building.
4. We note that the applicant has provided exceedance modelling. However, updated and detailed modelled outputs of flood extents and flow paths for a range of return periods up to the 1 in 100 year plus climate change event and exceedance flow paths for surface water for events greater than the 1 in 100 year + climate change should be provided for the new drainage scheme. Exceedance flow paths should also be

identified on a map for events greater than the 1 in 100 year plus climate change event.

5. We acknowledge that the applicant undertook infiltration tests. However, as a detention basin is proposed, we need to know where boreholes are located and where is the location of the highest groundwater level. We would require information about groundwater levels at the location of the basin.
6. The applicant will need to satisfy the LPA that the proposed drainage scheme can be adopted and maintained for its lifetime by providing a maintenance plan, detailing key operations and management. The maintenance of detention basin structure must be appropriate to prevent the risk of failure or reduction of its capacity.

For further advice on what we expect to be contained within the FRA to support a full planning application, please refer to our Developers Guide and Checklist on our surface water drainage webpage:

<http://www.hertfordshire.gov.uk/services/envplan/water/floods/surfacewaterdrainage/>

### **Informative to the LPA**

We recommend the LPA to obtain a maintenance plan that explains and follows the manufacturer's recommendations for maintenance or that it follows the guidelines explained by The SuDS Manual by CIRIA. A maintenance plan should also include an inspection timetable with long term action plans to be carried out to ensure efficient operation and prevent failure.

The applicant has changed drainage strategy for the proposed development. Without requested details the LLFA cannot with any certainty advise the LPA that the approach to drainage being proposed is acceptable and will effectively manage surface water to the required standards on the development site.

The applicant can overcome our objection by submitting information which covers the deficiencies highlighted above and demonstrates that the development will not increase risk elsewhere and where possible reduces flood risk overall, and gives priority to the use of sustainable drainage methods.

If this cannot be achieved we are likely to maintain our objection to the application.

We ask to be re-consulted when the amended surface drainage assessment will be submitted. We will provide you with bespoke comments within 21 days of receiving formal reconsultation. Our objection will be maintained until an adequate FRA has been submitted.

Yours sincerely,

Julia Puton  
SuDS Officer  
Hertfordshire County Council