

Environment Director & Chief Executive:
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Date 20 April 2017

RE: 6/2017/0550/MAJ - Land adjacent to Porsche Garage, Hatfield, AL10 9UA

Dear Mark,

Thank you for your consultation in relation to the above planning application for the erection of a 75 bed elderly care home development (C2) with 20 parking bays and associated landscaping, at Land adjacent to Porsche Garage, Hatfield Avenue, Hatfield, AL10 9UA.

We understand this application seeks full planning permission for a major development, and we have assessed the Surface and Foul Water Management report prepared by BJB Consulting, dated October 2016, with reference number 2277/SW01, 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. A statement of compliance with the NPPF and NPPG policies, LPA local plan policies and HCC SuDS Guidance and Policies.
2. Anecdotal information on existing flood risk with reference to most up to date data and information.

3. Location and extent of any existing and potential flood risk from all sources including existing overland flow routes, groundwater, flooding from ordinary watercourses referring to the national EA fluvial (River) and surface water flood maps.
4. Evidence of ground conditions/ underlying geology, permeability including BRE Digest infiltration tests and topographical survey to metres AOD.
5. Detailed calculations of existing surface water storage volumes and flows.
6. Detailed post development calculations/ modelling in relation to surface water are to be carried out for all rainfall events up to and including the 1 in 100 year including +40% an allowance for climate change (for brownfield sites we require pre- and post-development run-off rates and volumes).
7. Full detailed drainage plan including location of SuDS measures, pipe runs and discharge points, informal flooding (no flooding to occur below and including the 1 in 30 Year rainfall return period). All drawings to be 'final' not 'preliminary' or 'draft'.
8. Detailed modelled outputs of flood extents and flow paths for a range of return periods up to the 1 in 100 year + climate change event and exceedance flow paths for surface water for events greater than the 1 in 100 year + climate change.
9. Full details of any required mitigation/ management measures of any identified source of flooding.
10. Evidence that if the applicant is proposing to discharge to the local sewer network, they have confirmation from the relevant water company that they have the capacity to take the proposed volumes and run-off rates.
11. Details of required maintenance of any SuDS features and structures and who will be adopting these features to the lifetime of the development.

Overcoming our objection

We recorded several flooding events in the vicinity of the development site and we note that the development site is at risk of flooding from surface water. Therefore we require information of how the applicant intends to manage the surface water flows and volumes.

We note that proposed surface water drainage strategy intend to use attenuation tank. However, the applicant should explain if there is an existing system, how it works and if it is intended to be used. The applicant must demonstrate whether connect to the local surface water sewer that water company accepts the proposed discharge rate. As LLFA, we need to ensure that all the opportunities to improve the situation on site and in the surrounding of the development have been considered.

Informative to the LPA

The LLFA has produced a surface water drainage advice webpage which contains a Developers Checklist and Guide, HCC SuDS Policies and reference to other technical guidance. We ask that the LPA advises the applicant to review this information prior to submitting a surface water drainage strategy.

<http://www.hertsdirect.org/services/envplan/water/floods/surfacewaterdrainage/>

The LLFA also offer a pre-development service, further information on this can be found here:

<http://www.hertsdirect.org/services/envplan/water/floods/surfacewaterdrainage/preappguide/>

The applicant can overcome our objection by submitting a surface drainage assessment 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