

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

Date 28 April 2017

RE: 620170624MAJ - Plot 5000 Hatfield Business Park, Hatfield, AL10 9EZ

Dear David,

Thank you for your consultation in relation to the above planning application for the erection of a 3 storey building for B8 (storage and distribution) (4,878m²) and B1 (office/light industrial) (1,550m²) use, together with 100 car parking spaces, 10 cycle parking spaces, boundary treatment, landscaping, lighting and access, at Hatfield Business Park, Hatfield, AL10 9EZ.

We understand this application seeks full planning permission for a major development, and we have assessed the Flood Risk Assessment & Drainage Strategy prepared by Baynham Meikle Partnership Ltd, project reference PT/12313, dated March 2017, submitted to 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. Detailed post development calculations/modelling in relation to surface water for all rainfall events up to and including the 1 in 100 year return period, this must also include a +20% allowance for climate change.

2. Detailed drainage calculations for all rainfall return periods up to and including the 1 in 100 year + climate change event including pre-development greenfield run-off rates.
3. A detailed drainage plan including area of informal flooding. 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. Detailed modelled outputs of flood extents, depths 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. Full detailed engineering drawings for SuDS measures, flood mitigation and management measures.
6. Full detailed drainage strategy based on the principles agreed at the Outline Planning permission stage and demonstrates of how it complies with the Outline drainage strategy.
7. Evidence that if the applicant is proposing to discharge to the local sewer network that they have confirmation from the relevant water company or sewer network operator that they have the capacity to take the proposed volumes and runoff rates.
8. 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&2 We acknowledge the existence of Micro Drainage calculations. However, we require the overall run-off rate and the required storage volume to ensure that the proposed drainage strategy (all SuDS features) can attenuate for all rainfall events up to and including the 1 in 100 year plus climate change event.

We would like to see a justification why in the Micro Drainage modelling the FSR Rainfall model has been used and why the margin for flood risk warning has been set up for 150mm.

We note that the undeveloped run-off discharge rate for 1 in 100 year rainfall event, equal 57 l/s, for the proposed development is provided. However, the runoff rates that are generated by the whole site should be provided. This should include all rainfall events up to and including the 1 in 100 year plus climate change event. We would like to highlight that discharge rate from the site needs to be adapted respectively to the rainfall event (e.g. for 1 in 1 year rainfall event discharge rate from the site will be respectively lower compare to 1 in 100 year rainfall event). The applicant needs to prove that the surface water discharge rate is not exceeding the greenfield run-off rate for the development site area.

Pre-development and post-development surface water calculations should take account of the whole site area not just impermeable areas. Permeable areas will generate runoff at greenfield rates, and this will need to be managed by the proposed drainage scheme therefore the required attenuation volumes and run-off rates should reflect this.

- 3&4 We acknowledge that the applicant has provided the drainage layout. However, if there will be informal flooding within the site, these areas need to be identified on a development layout plan, showing the extent and depth of the flooding and under what rainfall event the flooding will occur. No flooding should occur at and below the 1 in 30 year rainfall event. It should be demonstrated that any flooding above this can be managed within the site without increasing flood risk to the proposed properties and the surrounding area. Both the 1 in 100 year and the 1 in 100 year plus climate change extents, depths and volumes should be established. Routes of exceedance will also need to be assessed and identified for rainfall events that exceed the 1 in 100 year plus climate change event.
5. We require full engineering details of any SuDS feature and mitigation or management measures of any identified source of flooding supported by detailed modelling.
 6. We require full, detailed drainage strategy based on the principles agreed at the Outline Planning permission stage. We need to know how the proposed surface water strategy complies with the Outline drainage strategy.
 7. If a discharge is proposed to a surface water sewer we require confirmation from the water company or sewer network operator that they are satisfied to receive the proposed discharge at the proposed rates and volumes. As this is for a full planning application we require that this confirmation should be provided prior to the approval of planning permission to ensure that the proposed scheme is feasible. An agreement in principle rather than a formal permission at this stage would be acceptable.
 8. 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 permeable pavement and the underground attenuation structure must be appropriate to prevent the risk of failure or reduction of its capacity. Underground and any mechanical features are likely to carry a higher risk as a result of poor maintenance.

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 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