

Environment Director & Chief Executive:
John Wood



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Date 17 January 2018

RE: 6/2017/2964/MAJ – Blue Moon Paddock Woodfield Lane Brookmans Park AL9 6JJ

Dear Mark,

Thank you for consulting us on the above application for the demolition of existing redundant structures and erection of single family dwelling house (within envelope of existing structures), together with associated tree planting scheme (part of Centenary Woods project sponsored by Woodland Trust); landscaping and car parking.

We have reviewed the Flood Risk Assessment (focus on surface water management) dated 30 June 2015 submitted to support to this application.

LLFA objects to the grant of planning permission on the above application based on the overall feasibility of the proposed drainage scheme for this site. The Flood Risk Assessment provided by the applicant does not provide a suitable basis for assessment to be made of the flood risks arising from the proposed development.

There are 4 main issues that need to be addressed or clarified in relation to this site, these being:

1. Clarification on the proposed discharge mechanism would be required. This is to include discharge point location or infiltration tests in case infiltration is proposed as discharge mechanism.
2. Clarification on the runoff rate from the site. Calculation/modelling should be made based on the whole site area and should include all relevant return periods plus 40% for climate change. Calculation should be done including pre development greenfield run off rates and for the site post development.
3. Clarification on the drainage scheme along with provision of a full detailed surface water drainage layout including the location of the proposed SuDS features, pipe runs, discharge points and informal flooding (no flooding to occur below and including the 1 in 30 year rainfall return period).

4. Clarification and provision of information in relation to the proposed car parking area.

Overcoming our objection

In order for the applicant to satisfactorily address these 4 points the following clarification is provided along with the details of what we expect the applicant to achieve so that our objection can be removed.

1. We acknowledge that the applicant proposes to manage the surface water generated by the impermeable area by implementing above ground feature such as a swale. However, it is not clear whether the swale will be discharging into a discharge point or the surface water will directly infiltrate. Therefore, information regarding the discharging point will have to be provided, or alternatively in case the applicant intends to infiltrate the surface water, infiltration tests in accordance with the guidelines set by BRE Digest 365 where infiltration is proposed will have to be carried out in order to prove the feasibility of this mechanism.
2. We are pleased to find that the applicant is proposing greenfield run off rates. However we noted that a climate change allowance of 30% was considered in the calculation. Also only the impermeable area was considered for the calculation. The applicant should therefore update calculation considering the upper end climate change allowance of 40% and taking into account the whole site and not only the impermeable area.

We remind the applicant that permeable areas generate runoff at the greenfield run off rate and this also needs to be taken into account when updating the calculations.

Regarding the volume of the proposed above ground attenuation feature, the applicant has considered in the calculations a return period of 100 year + 30% for climate change allowance. Also we have noted that the applicant has considered a drainage area corresponding to the impermeable area and not the whole site area. Updated calculations/modelling should be provided and include greenfield runoff rates and volumes that are generated by the whole site area. Attenuation/storage requirements should be calculated for all relevant rainfall return periods up to and including the 1 in 100 year plus 40% for climate change event. Pre-development and post-development surface water calculations should take account of the entire site area not just impermeable areas.

3. The applicant is proposing to drain the surface water runoff into an above ground feature. However no information have been provided regarding the location of this attenuation feature. Also the drawing No. P/502 – Proposed site plan submitted in support of this application do not show the above mentioned feature. Hence we require clarification regarding the proposed drainage scheme and the provision of a drainage scheme showing the location of the attenuation of the proposed SuDS feature, pipe runs, discharge points and informal flooding (no flooding to occur below and including the 1 in 30 year rainfall return period) along with all the corresponding detailed calculations.
4. The planning application refers to a car parking area however no information is provided regarding this area. The drainage strategy should therefore be updated in

order to include details regarding the parking area, including area and location. This area should also be included in the proposed site plan.

We acknowledge that this is a major application for the construction of a single dwelling.

However, we consider that it is important that certain details are confirmed to ensure that there will be no flood risk to the site and the surrounding area.

For further advice on what we expect to be contained within the surface water drainage strategy 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#>

Informative to the LPA

The applicant can overcome our objection by undertaking a surface water drainage strategy which 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, the SuDS hierarchy and management train. If this cannot be achieved we will consider whether there is a need to maintain our objection to the application. Production of a surface water drainage strategy will not in itself result in the removal of an objection.

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

Yours sincerely,

Ana Neves
Flood & Water Project Officer
Hertfordshire County Council