

Environment Director & Chief Executive:
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Date 26 September 2017

RE: 6/2018/2150/MAJ - University of Hertfordshire De Havilland Campus, Hatfield, AL10 9UF

Dear Mark,

Thank you for consulting us on the above application for the erection of three storey business and social building, associated drainage, landscaping and ancillary works, at University of Hertfordshire, de Havilland Campus, Hatfield, AL10 9UF.

We understand this application seeks full planning permission for a major development, and we have assessed the Drainage Strategy Report prepared by Conisbee, reference 180149/J Courtney, revision 1.0, dated 14th August 2018, 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. Limiting the final surface water discharge from the site to Greenfield run-off rates.
2. Exploring the opportunity to implement above ground storage solutions.
3. Details of any required maintenance of any SuDS features and structures and who will be adopting these features for the lifetime of the development. Please note that for residential development the lifetime is 100 years.

Overcoming our objection

1. We acknowledge the existence of the Drainage Strategy Report. We note that the applicant intends to limit the final discharge from the site to 5 l/s.

As the LLFA, we would expect the applicant to limit the final discharge from the site to Greenfield run-off rates. We are aware that there are new devices available in the market, which will allow securing the final discharge rate from the site below 5 l/s.

We understand that the final discharge point from the site for surface water run-off is Ellen Brook. We are aware as well that there are downstream flooding problems within this river. Therefore, the final discharge from the site should be at Greenfield run-off rates.

In line with the above we would expect the applicant to update and submit the drainage report including updated modelling and drainage layout.

2. We acknowledge that the applicant intends to implement underground storage solutions only. We note as well that the existing area is a Greenfield site. Therefore, we expect the applicant to explore above ground storage solutions for the proposed development.

We note the link between this planning application and the planning application 6/2017/0585/FULL at the same site with the similar development proposal, which we have commented on. Therefore, we are disappointed that the above ground solutions have not been explored. Underground features are likely to carry a higher risk of failure.

3. 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 soakaways and the cellular storage 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 surface water management scheme has been submitted.

Yours sincerely,

Julia Puton
SuDS Officer
Hertfordshire County Council