

Director of Environment & Infrastructure:
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Date 11 July 2019

RE: 6/2019/1370/MAJ – Land to the east of Firs Wood Close, Northaw

Dear William,

Thank you for your consultation in relation to the above planning application for the erection of 26 dwellings and associated access, at Land to the east of Firs Wood Close, Northaw.

We understand this application seeks full planning permission for a major development, and we have assessed the Drainage Strategy prepared by Gyoury Self Partnership (St Albans) LLP, reference 14114PL, revision A, dated 29 May 2019, 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. Updated drainage strategy.
2. Updated, 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 including plus 40% allowance for climate change.
3. Updated, detailed drainage plan including the location of all SuDS features, pipe runs, invert levels and discharge points.
4. Confirmation of third part landowner agreement.

Overcoming our objection

1. We acknowledge the applicant has submitted a drainage strategy based on lined permeable paving with sub-base, attenuation tank feature and discharge into an ordinary watercourse at 5 l/s.

However, as the site is currently a Greenfield area, we would advise the applicant that only above ground SuDS features should be included in the drainage strategy.

Moreover, as the LLFA, we are aware that new flow control devices are now available on the market. Therefore, as the final discharge from the site is into an ordinary watercourse, the final discharge rate should be limited to Greenfield run-off rates for the relevant rainfall events.

2. We acknowledge that calculations have been submitted.

However, as the final discharge rate should be limited to Greenfield run-off rates for the relevant rainfall events, all modelling should be updated in line with that.

Moreover, based on the steep characteristic of the site we would advise that the applicant at this stage may have to consider cascade modelling to model the realistic storage available.

3. We note that the applicant has provided a drainage plan.

However, all SuDS features included in the drainage strategy report should be included on the drawing, as well as any pipes, invert levels and proposed discharging points from the proposed development. We need to ensure that the drainage strategy for the proposed development is feasible.

4. We note that the proposed strategy includes discharge into a pond that is located out of the site boundary.

Therefore, we require confirmation from the relevant third party landowner that they are satisfied to receive the proposed discharge at the proposed rates, volumes and location. This should include as well an agreement to cross the third party land to undertake headwall construction works. 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.

As the LLFA, we would consider the existing pond to the north of the development site, where the applicant intends to discharge all the run-off from the site, to be a part of the existing ordinary watercourse. Therefore, any works proposed to be carried out that may affect the flow within an ordinary watercourse will require the prior written consent from the Hertfordshire County Council under Section 23 of the Land Drainage Act 1991. This includes any permanent and or temporary works regardless of any planning permission.

For further information and to obtain our Land Drainage Consent forms please refer to our website.

<https://www.hertfordshire.gov.uk/services/recycling-waste-and-environment/water/ordinary-watercourses/>

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:

<https://www.hertfordshire.gov.uk/services/recycling-waste-and-environment/water/surface-water-drainage/>

Informative to the LPA

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