

Director of Environment & Infrastructure:
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Date 31 October 2019

RE: 6/2019/1411/MAJ – Plot 5100, Mosquito Way, Hatfield Business Park, Hatfield, AL10 9WN

Dear David,

Thank you for your re-consultation in relation to the above planning application for the erection of a multi-franchise car dealership (sui generis use) with offices (B1 use class), workshops (B2 use class) and car storage (B8 use class), together with car parking, cycle parking, boundary treatment, landscaping, lighting and access, at Plot 5100, Mosquito Way, Hatfield Business Park, Hatfield, AL10 9WN.

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 JD/12690, report status 4th Issue, dated September 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. An updated drainage strategy to include reduced discharge rate.
2. Evidence that if the applicant is proposing to discharge to the local sewer network that they have confirmation from the relevant water company that they have the capacity to take the proposed volumes and runoff rates.
3. Further details on SuDS management stages provided within the drainage strategy.

4. 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. We acknowledge that the applicant has submitted an updated drainage strategy limiting the final surface water discharge rate from the site to 123l/s.

However, based on the latest response provided by the water company '*Thames Water has identified an inability of the existing SURFACE WATER infrastructure to accommodate the needs of this development proposal*'.

As per Thames Water advice 11 l/s should be accommodated for the final surface water discharge from the site, which corresponds to Greenfield runoff rates.

Therefore, we would strongly advise that the proposed drainage strategy should be revised and appropriate discharge rates should be proposed.

We would like to highlight that the submitted modelling, the drainage layout and the informal flooding areas drawing will have to be updated in line with the above.

2. Based on our comments above, we note that Thames Water has been consulted.

We note that Thames Water would have no objection in principle for the final discharge from the site being restricted to 11 l/s. If a higher discharge rate will be proposed, we would strongly advise the LPA that prior approval from Thames Water should be provided.

3. Based on the submitted information, we do not believe that an appropriate SuDS management train has been proposed or even assessed. We would strongly refer to the latest response from Environment Agency submitted on the planning portal.

We would strongly advise the applicant that as a minimum two SuDS management stages should be provided for all the runoff from the proposed access road, internal roads and parking spaces.

We understand that the applicant intends to include permeable paving with sub-base and retention petrol interceptor to provide a level of treatment. However, this does not provide an appropriate level of SuDS management stages for the entire site.

4. We would like to highlight that no updated maintenance plan has been submitted.

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 all SuDS structures 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. It should be clarified as well who will be responsible for undertaking all maintenance works.

Informative to the LPA

We would like to highlight to the LPA that the proposed discharge rate by the applicant is not acceptable by Thames Water and there is insufficient capacity in the existing surface water infrastructure to accommodate the proposed discharge rate. We would strongly advise that the applicant should reconsider the proposed drainage strategy and largely reduce the final discharge rate from the proposed development site.

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 for all SuDS features 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