

Director of Environment & Infrastructure:
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Date 18 July 2019

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

Dear David,

Thank you for your 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 1st Issue, dated 22nd February 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. Clarification of the maximum allowable discharge rate from Plot 5100 and updated drainage strategy plan to include roads/hardstanding areas.
2. 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.

3. Further details on SuDS management stages provided within the drainage strategy.
4. Informal flooding areas for the 1 in 100 year rainfall event including an allowance for climate change to be identified on a map. Exceedance flow paths for surface water for events greater than the 1 in 100 year plus climate change should be identified as well.
5. 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 provided a drainage strategy based on oversized pipes, attenuation tank, lined permeable paving areas with sub-base and discharge into a public sewer at 133l/s into an existing connection from the site.

However, based on the information provided by the LPA to the LLFA regarding the wider strategic drainage plan for the Hatfield Business Park, we understand that the original implemented drainage strategy included two discharge points with a combined allowable discharge rate of 180l/s. We note that Plot 5000 has an agreed discharge rate of 57l/s. This would then leave a maximum allowable discharge rate of 123l/s for plot 5100. We would therefore advise the applicant that the proposed discharge rate of 133l/s from the site to be clarified.

Moreover, the applicant should clarify how all internal roads, the access road and all parking areas will be drained.

2. We understand that the applicant intends to discharge all the run-off from the site into the existing Thames Water surface water sewer.

Therefore, we require confirmation from Thames Water 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.

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

Therefore, we would advise that proposed SuDS management stages should be clarified by the applicant.

4. We note that informal flooding will occur on site for the 1 in 100 year rainfall event including an allowance for climate change.

Therefore, we would advise that these areas need to be identified on a development layout plan, showing the extent and depth of the.

Moreover, 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. 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 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