

Director of Environment & Infrastructure:
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Date 18 February 2021

RE: 6/2020/3222/MAJ – Former Volkswagen Van Centre, Comet Way, Hatfield, AL10 9TF

Dear Sukhdeep,

Thank you for your consultation in relation to the above planning application for the Demolition of existing buildings and construction of new building comprising 118 residential apartments, layout of parking areas, landscaping, electricity substation and ancillary development at Former Volkswagen Van Centre, Comet Way, Hatfield, AL10 9TF.

We understand this application seeks full planning permission for a major development, and we have assessed the Flood Risk Assessment report prepared by Stantec UK Limited project reference 47179/4001/FRA dated November 2020, the Drainage Statement prepared by Stantec UK Limited project reference 47179/4001/DS dated November 2020 and the additional information submitted to support 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 modelling with any supporting information.
2. Clarification of the submitted surface water drainage strategy.

Overcoming our objection

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1. We are happy to see the usage of multifunctional features like green roofs. We note the final discharge from the site will be limited to 3.8 l/s, which corresponds to the 1 in 100 year greenfield runoff rate.

The proposed discharge rate provides betterment compare to the existing mechanism on the site. However, the applicant should aim to achieve greenfield runoff rates for the relevant rainfall events. No technical justification has been provided on why this cannot be achieved. Moreover, in the submitted FRA the applicant indicated that the final discharge will be limited to 1 l/s. Therefore, we would advise the discharge rate to be reduced and limited to 1 l/s or limited to greenfield runoff rates for the relevant rainfall events.

Post development calculations have been provided. We note green roofs and roof planters have been incorporated in the design and have been introduced in the drainage network model as such. Those SuDS systems are fully justified in term of SuDS benefits (landscape/public amenity), however they should not be included in the calculation as part of the storage volume unless this volume is available for attenuation only and drain down times are included. Therefore, we would encourage the applicant to consider the usage of blue roof structures, as in our view those are suitable features for residential developments.

Moreover, the applicant should estimate half drain down times for all SuDS storage features, especially for the underground tank with 1.6m depth.

In the submitted model we also noted that margins for flood risk warnings have been removed. Therefore, the applicant should clarify this. In line with a standard design margins for flood risk warnings should be set at 300mm.

2. We note that some of car parking areas, located outside of the building footprint, will be provided with permeable paving with sub-base. However, there are some parking spaces where these structures cannot be provided. Therefore, the applicant should clarify how surface water from those areas will be captured and treated prior to reaching the piped network.

Moreover, it should be clarified and identify on a plan how the rest of undercroft parking will be drained, as no information has been provided.

As the LLFA, we are assessing surface water drainage within the application's red line boundary. Therefore, the applicant should clarify how they intend to drain new proposed footpaths around the building.

On the submitted drainage plan the proposed depth of the cellular storage does not match with the cross section drawing included. We would advise this should be consistent and the layout plan should be updated. In addition, depth of permeable paving sub-base structure should be also clarified.

Any changes based on our comments above should be supported by an updated report, modelling and an updated drainage layout. The applicant should ensure the drainage strategy report matches with the provided FRA.

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 re-consultation. Our objection will be maintained until an adequate surface water management scheme has been submitted.

Yours sincerely,

Julia Puton
SuDS Officer
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