

Director of Environment & Transport:
Mark Kemp



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Lead Local Flood Authority
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Hertfordshire County Council
County Hall, Pegs Lane
HERTFORD SG13 8DN

Contact Adam Littler
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Date 27 July 2022

Dear Sirs,

RE: 6/2021/3422/MAJ - Salisbury Square, Hatfield, AL9 5AD

Thank you for re-consulting us on the above application for the erection of 1 x building containing 3 x flats, 11 x offices and 1 x retail unit (Use Class E), erection of 5 x terrace houses with parking and associated works, involving demolition of existing shopping parade with 7 x maisonettes above, alterations to existing parking area and erection of a parking area at Salisbury Square, Hatfield, AL9 5AD.

The applicant has provided the following information in support of the application:

- Surface and Foul Water Drainage Strategy Report carried out by WSP Gascoyne Estates Ltd reference 8003-WSP-ZZ-RP-D-0001-P02 Issue 3 (P03), Updated in response to LLFA comments. Dated 31 May 2022.
- Letter to LLFA dated 31 May 2022.

Recommendation:

Holding Objection

Key Issues:

The information provided to date does not provide a suitable basis for an assessment to be made of the flood risk, nor sustainable surface water management strategy, arising from the proposed development.

Detailed Comments:

The LLFA does not accept all the arguments put forward for consideration in the letter to LLFA dated 31 May 2022, as detailed in the following:

Section 2.3.8. of the Surface and Foul Water Drainage Strategy Report carried out by WSP Gascoyne Estates Ltd reference 8003-WSP-ZZ-RP-D-0001-P02 Issue 3 (P03), updated in response to LLFA comments dated 31 May 2022, states:

“Site specific ground investigations should be undertaken at a later stage to confirm these findings and site soakage testing to BRE 365 could be conducted at a later date to confirm if infiltration is viable or not.”

The LLFA expect to see infiltration test results to BRE365 standards for the site at this stage in the design iteration. The use of infiltration has been ruled out by the applicant without robust evidence that this form of drainage, in line with the drainage hierarchy, cannot be utilised. The applicant should undertake such testing and submit results to the LLFA for technical assessment.

Furthermore, the soil type used in the Wallingford Procedure identifies soil type as 2. The applicant should validate why there is an assertion the site is based on clay, yet soil 2 is used for calculation purposes.

The applicant should also re-run the calculation files for all impermeable area using a Cv value of 0.95 for roofed areas and 0.9 for all hardstanding, as a sensitivity test. The LLFA does not currently have confidence the default Cv values used accurately represent the site conditions. If the applicant does not agree with this, they should justify clearly why they believe this is not required.

In order for the Lead Local Flood Authority to advise the relevant Local Planning Authority that the site will not increase flood risk to the site and elsewhere and can provide appropriate sustainable drainage techniques the following information is needed:

- 1) Suitable Drainage Strategy including assessment of the SuDS hierarchy. The applicant should now provide a compliance report detailing how the proposed Surface Water Drainage Strategy conform to local and national standards
- 2) Clarification of flood risk to the site – a statement of conformity addressing the areas of low, medium and high surface water flood risk for the site is required.
- 3) Provision of greenfield run-off rates for catchment 1 – CALCULATION FILES ACCEPTED – sensitivity testing now required.
- 4) Clarification of car park drainage - JUSTIFICATION ACCEPTED
- 5) Confirmation from Thames Water that they are satisfied with the proposed rates – ACCEPTED – further reduction to greenfield rates advocated.

Justification as to why the ordinary watercourse is not an appropriate point of discharge – ACCEPTED.

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 – ACCEPTED.

As previously highlighted to the applicant the site is deemed to be at low, medium and high risk of surface water flooding. We require further clarification establishing the location/extent of any existing and potential surface water flood risk alongside surface water flood maps. In areas where flooding from surface water is identified, we require

clarification on the mitigation methods used to overcome this to ensure there is no increase in flooding both on and off site from the proposed development. Pre and post development mitigated surface water flow paths should be identified on plan, this should include explanation of safe ingress/egress in times of exceedance.

The LLFA would strongly recommend that the runoff rate for catchment 1 is revised in order to get this as close to the pre-developed, greenfield run off rates as possible. Whilst we understand there is a betterment to the existing discharge rate, the LLFA would urge for this to be reduced as much as feasibly possible when creating a new drainage strategy for the site.

Overcoming our objection

In order to overcome our objection, please see the detailed comments below:

The applicant should address the points raised in the above in the form of a Sustainable Surface Water Management Strategy Compliance Report. This must clearly demonstrate how the proposal is aligned with Local and National Standards, CIRIA C753 and Local Policy.

For further advice on what we expect to be contained within the FRA to support an outline 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/>

This link also includes HCC's policies on SuDS in Hertfordshire.

Please note if the LPA decide to grant planning permission, we wish to be notified for our records should there be any subsequent surface water flooding that we may be required to investigate as a result of the new development.

We have provided comments from the Lead Local Flood Authority in this letter. However, due to the LLFA SuDS team staff shortages, we may not be able to provide further advice at this site.

Yours sincerely

Adam Littler
SuDS Officer
Environment & Transport