

Ms Kirsty Shirley  
Welwyn Hatfield Borough Council  
Welwyn Hatfield Borough Council Offices  
The Campus  
Welwyn Garden City  
Hertfordshire  
AL8 6AE

**Lead Local Flood Authority**  
**Post Point CHN 215**  
**Hertfordshire County Council**  
**County Hall, Pegs Lane**  
**HERTFORD SG13 8DN**

Contact: Anna Mierzejewska  
Email [FRMConsultations@hertfordshire.gov.uk](mailto:FRMConsultations@hertfordshire.gov.uk)

Date 19 May 2023

Dear Kirsty

**RE: 6/2023/0810/EIA - Former Hook Estate and Kennels, Northaw, EN6 4BY**

Thank you for consulting the LLFA in relation to above case received on 2 May 2023.

We understand this is a Request for Screening Opinion to enquire if there is a requirement for an Environmental Impact Assessment ('EIA') in respect of a proposed retirement living (C2 – extra care) led scheme on the site of the Former Hook Estate and Kennels.

The LLFA would not wish to make any comments on whether the screening report is, or is not, required for this development, however we would like to offer some guidance in relation to the flood risk and drainage that may concern the proposed site.

Since the site is over 1ha in size and at risk of flooding from rivers and surface water sources, a comprehensive FRA in line with Herefordshire Lead Local Flood Authority guidance and current NPPF guidance would be required to be submitted as part of the planning. All sources of flooding should be assessed in the FRA to include flood risk from surface water, ordinary water courses, groundwater, artificial sources like reservoirs, severs and existing drainage infrastructure. We highlight that there are ordinary watercourses within the site boundary and the Environment Agency Risk of Surface Water Flood Map indicates that a large proportion of the site is at risk of surface water flooding. We highlight that the most sustainable form of flood risk management is avoidance and if the site passes the sequential test (for all sources of flooding), the sequential approach should be used within the site boundary. All the ordinary watercourse / surface water flow path should be appropriately modelled, and specific flood risk identified. This should be integrated with any flood model of the main river and associated flood extents (from the Environment Agency modelling information). We would anticipate that only around 50% of the red line boundary may be available for development.

We would expect that any development takes all opportunities to improve any existing risks of flooding to existing properties. Opportunities should also be considered on how the development may improve flood risk downstream by assessing if any additional flood mitigation can be provided as part of this redevelopment.

The most up to date climate change allowances should be taken that are in place at the time of any assessment.

It is noted that the proposed development is for up to 150 dwellings and is to be considered as a major development. The Sustainable Drainage Strategy (SuDS) should be considered at an early stage of the planning. The drainage system should be considering the four pillars of SuDS (water quantity, water quality, amenity and biodiversity) and following the surface water discharge hierarchy. We would expect that investigation into infiltration potential be undertaken but if unfavourable, any existing runoff rates / volumes be returned to a pre-development greenfield scenario. We would also expect that full above ground green SuDS be utilised as much as possible, e.g. water reuse, green roofs, bio-retention areas, ponds / basins etc.

For further advice on what we expect to be contained within the FRA to support a 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/surface-water-drainage.aspx> this link also includes HCC's policies on SuDS in Hertfordshire.

Erection of flow control structures or any culverting of an ordinary watercourse requires consent from the appropriate authority, which in this instance is Hertfordshire Lead Local Flood Authority and the Local Council (if they have specific land drainage bylaws). It is advised to discuss proposals for any works at an early stage of proposals.

In December 2022 it was announced FEH rainfall data has been updated to account for additional long term rainfall statistics and new data. As a consequence, the rainfall statistics used for surface water modelling and drainage design has changed. In some areas there is a reduction in comparison to FEH2013 and some places an increase (see [FEH22 - User Guide \(hydrosolutions.co.uk\)](https://www.feh.gov.uk/FEH22-User-Guide)). Any new planning applications that have not already commissioned an FRA or drainage strategy to be completed, should use the most up to date FEH22 data.

Please note if, you the Local Planning Authority review the application and decide to grant planning permission, you should notify the us, the Lead Local Flood Authority, by email at [FRMConsultations@hertfordshire.gov.uk](mailto:FRMConsultations@hertfordshire.gov.uk).

Yours sincerely

Anna

Anna Mierzejewska  
SuDS and Watercourses Support Officer  
Environment & Transport and Sustainable Growth

[www.hertfordshire.gov.uk](http://www.hertfordshire.gov.uk)