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Contact Flood Risk Management Team
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Date 18 March 2024

Dear Mr Elmore

RE: 6/2023/2418/OUTLINE – Former Hook Estate and Kennels, Cooper Lane Road/Firs Wood Close, Northaw, EN6 4BY

Thank you for your consultation on the above site, received on 2 January 2024. We have reviewed the application as submitted and wish to make the following comments.

This is an Outline Planning Application with all matters reserved except for primary means of access for C2 (extra care) dwellings, ancillary community facilities, landscaping, and access from Coopers Lane Road.

The LLFA acknowledges that there is flood risk to the site. However, the developable area is outside of the fluvial flood zone area and is at low risk of surface water flooding. As such the LPA should satisfy themselves that they have requested and assessed appropriate Sequential and Exception Test information for this proposed development.

However, the sequential approach should be followed and the applicant should locate buildings outside of the areas at risk of surface water flooding. Additionally, the LLFA would recommend that drainage is required to suitably manage surface water flows from the up-slope catchment of the proposed buildings.

We have **no objection subject to conditions being attached to any consent** if this application is approved. We suggest the following wording.

If the LPA wish to clarify that this information cannot be submitted prior to determination as we acknowledge the duration of this consultation with the LLFA, we suggest the following conditions:

Condition 1:

All development shall be constructed in accordance with the submitted and approved Flood Risk Assessment [dated April 2023], this includes all new residential dwellings to have a finished floor level raised a minimum of 300mm above any design flood level and 150mm above the surrounding proposed ground level unless otherwise first approved in writing by the Local Planning Authority.

Reason: To ensure the flood risk is adequately addressed and not increased in accordance with NPPF and Policies of Welwyn Borough Council.

Condition 2:

Prior to or in conjunction with the submission of each reserved matters application, in accordance with the submitted FRA [Flood Risk Assessment for the proposed development at Land North of Coopers Lane Road, REF FRA&DS-22278 REV C] detailed designs of a surface water drainage scheme incorporating the following measures shall be submitted to and agreed with the Local Planning Authority. The approved scheme will be implemented prior to the first occupation of the development. The scheme shall address the following matters:

1. Evidence of a Plan A and Plan B scenario, outlining an alternative strategy and discharge location if infiltration, as Plan A, was proven to be unfavourable. Surface water runoff rates will be attenuated to a total of the greenfield QBAR rate.
2. Greenfield and Brownfield runoff rates and volumes to be provided and the method of calculation to be evidenced.
3. Provision of surface water storage, sized and designed to accommodate the volume of water generated in all rainfall events up to and including the critical storm duration for the 3.33% AEP (1 in 30 year) and 1% AEP (1 in 100) rainfall events (both including allowances for climate change).
4. Detailed designs, modelling calculations (using FEH13 or FEH22 rainfall data, CV value of 1 and including an allowance for urban creep) and plans of the of the drainage conveyance network in the:
 - 3.33% AEP (1 in 30 year) critical rainfall event plus climate change to show no flooding outside the drainage features on any part of the site.
 - 1% AEP (1 in 100 year) critical rainfall plus climate change event to show, if any, the depth, volume and storage location of any flooding outside the drainage features, ensuring that flooding does not occur in any part of a building or any utility plant susceptible to water (e.g. pumping station or electricity substation) within the development. It will also show that no runoff during this event will leave the site uncontrolled.
5. The design of the attenuation basin will incorporate an emergency spillway and any drainage structures include appropriate freeboard allowances. Plans to be submitted showing the routes for the management of exceedance surface water flow routes that

minimise the risk to people and property during rainfall events in excess of 1% AEP (1 in 100) rainfall event plus climate change allowance.

6. The benefits of biodiversity and amenity need to be laid out clearly.
7. In-principle agreement consent is required for discharge to a watercourse. This should be sought through the Environment Agency for man river and the LLFA for ordinary watercourses.
8. Finished ground floor levels of properties are a minimum of 300mm above expected flood levels of all sources of flooding (including the ordinary watercourses, SuDS features and within any proposed drainage scheme) or 150mm above ground level, whichever is the more precautionary.
9. Details of how all surface water management features to be designed in accordance with The SuDS Manual (CIRIA C753, 2015), including appropriate treatment stages for water quality prior to discharge.
10. A maintenance and management plan detailing the activities required and details of who will adopt and maintain the all the surface water drainage features for the lifetime of the development.

Reason:

To prevent flooding in accordance with National Planning Policy Framework paragraphs 173,175 and 180 by ensuring the satisfactory management of local sources of flooding surface water flow paths, storage and disposal of surface water from the site in a range of rainfall events and ensuring the SuDS proposed operates as designed for the lifetime of the development.

Condition 3:

Construction shall not begin until a detailed construction phase surface water management plan for the site has been submitted to and approved in writing by the Local Planning Authority. The scheme shall subsequently be carried out in accordance with the approved details.

Reason: To ensure that the construction of the site does not result in any flooding both on and off site and that all Surface water Drainage features are adequately protected.

Condition 4:

The development hereby approved shall not be occupied until details of the maintenance and management of the sustainable drainage scheme have been submitted to and approved in writing by the Local Planning Authority. The drainage scheme shall be implemented prior to the first occupation of the development hereby approved and thereafter managed and maintained in accordance with the approved details in perpetuity. The Local Planning Authority shall be granted access to inspect the sustainable drainage scheme for the lifetime of the development. The details of the scheme to be submitted for approval shall include:

1. a timetable for its implementation.
2. details of SuDS feature and connecting drainage structures and maintenance requirement for each aspect including a drawing showing where they are located.
3. a management and maintenance plan for the lifetime of the development which shall include the arrangements for adoption by any public body or statutory undertaker, or any other arrangements to secure the operation of the sustainable drainage scheme throughout its lifetime. This will include the name and contact details of any appointed management company.

Reason: To ensure that the development achieves a high standard of sustainability and ensure the flood risk is adequately addressed for each new dwelling and not increased in accordance with NPPF and Policies of Welwyn Borough Council.

Condition 5:

Prior to first use of each phase of the development a detailed verification report, (appended with substantiating evidence demonstrating the approved construction details and specifications have been implemented in accordance with the surface water drainage scheme), has been submitted to and approved (in writing) by the Local Planning Authority. The verification report shall include a full set of “as built” drawings plus photographs of excavations (including soil profiles/horizons), any installation of any surface water drainage structures and control mechanisms.

Reason: To ensure that the development achieves a high standard of sustainability and ensure the flood risk is adequately addressed for each new dwelling and not increased in accordance with NPPF and Policies of Welwyn Borough Council.

Informative

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

Yours sincerely

Ellie

Ellie Miller
SuDS and Watercourses Support Officer
Growth and Environment

Annex

The following documents have been reviewed, which have been submitted to support the application:

- Geo-Environmental Assessment for Northaw, Potters Bar, prepared by IDOM, April 2023, REF GEA-22278-21-263
- Flood Risk Assessment for the proposed development at Land North of Coopers Lane Road, prepared by IDOM, April 2023, REF FRA&DS-22278 REV C