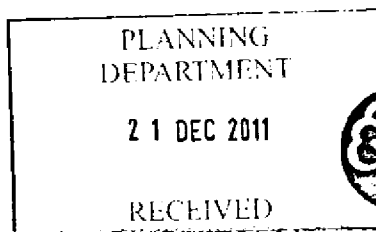


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**Environment
Agency**

Sarah Smith
Welwyn-Hatfield District Council
Development Control
The Campus
Welwyn Garden City
Hertfordshire
AL8 6AE

Our ref: NE/2011/111405/01-L01
Your ref: N6/2010/3120/DC3
Date: 29 March 2011

Dear Sarah

Splashlands, Stanborough Road, Welwyn Garden City.

Redevelopment of site to provide a wet play area, adventure play areas, an educational play area, high ropes attraction, changing huts, education room, cafe and toilet facilities.

Thank you for your consultation email dated 4 March and agreeing to extend my deadline for this consultation response.

In the absence of an acceptable Flood Risk Assessment (FRA) we **object** to the grant of planning permission and recommend refusal on this basis for the following reasons:

Reason

The FRA submitted with this application (WYG, December 2010, Ref A067207-FRA) does not comply with the requirements set out in Annex E, paragraph E3 of Planning Policy Statement 25 (PPS 25). The submitted FRA does not therefore, provide a suitable basis for assessment to be made of the flood risks arising from the proposed development.

In particular the submitted FRA fails to:

1. Provide sufficient information to demonstrate that the flood plain compensation scheme will ensure that there is no increase in flood risk as a result of this development.
2. Demonstrate that Sustainable Drainage Systems have been maximised for surface water attenuation.
3. No information has been provided about the timber viewing decks and other riverside features.

Resolution

The FRA states that level for level compensation will be provided. This has not been supported by the required evidence and the FRA does not detail how this



will be achieved. Our basic requirements for compensatory flood plain storage are:

- A volume of flood plain equal to that lost to the proposed development must be created.
- The equal volume must apply at all levels between the lowest point on the site and the design flood level. Normally this is calculated by comparing volumes taken by the development and the volume offered by the compensatory storage for a number of horizontal slices through the range defined above (see the example of compensatory storage on the last page for a depiction of this).
- The thickness of a slice should be typically 0.2 metres. In the case of large flat sites or very steep sites this may be varied to 0.1 or even 0.05 metres. The slice thickness should be set to provide between ten and fifteen slices for such unusual sites.
- Compensatory storage must be provided equal to or exceeding the development for each of these slices to ensure there will be no net loss of flood storage.
- Excavation of the compensation scheme must be complete before infilling commences to ensure that flood plain capacity is maintained during construction of the development.

The FRA acknowledges that surface water should be managed using Sustainable Drainage Systems. It also notes that above ground sustainable drainage techniques such as ponds, swales and detention basins can be designed for sites where infiltration is not possible.

However, the FRA goes on to state that the required attenuation storage will be provided in oversized pipes underground storage tanks. No explanation is given for this decision. The applicant has not provided any justification as to why a more sustainable option has not been chosen.

For a site such as this which already features ponds, marshes and open green areas there appears ample scope to incorporate Sustainable Drainage Systems into the proposal. The surface water drainage scheme must be informed by the attached SuDS hierarchy and the most sustainable options must be incorporated into the site design. The current proposed use of oversized pipes and tanks is unacceptable.

Advice to applicant

All works within 8 metres of the River Lee require Flood Defence Consent irrespective of planning permission granted. To ensure that the riverside features

are acceptable we will need to see further detail which demonstrates that there is no adverse impact upon river flows or biodiversity. Please contact Sarah Smith on 017007 632629 to discuss this further.

Please contact me if you have any queries.

Yours sincerely

Ben Llewellyn
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