

Environment Director & Chief Executive:
John Wood



Mark Peacock
Welwyn Hatfield Borough Council
The Campus
Welwyn Garden City
Herts
AL8 6AE

Post Point CHN 215
Hertfordshire County Council
County Hall, Pegs Lane
HERTFORD SG13 8DN

Contact Julia Puton
Tel 01992 556441
Email FRMConsultations@hertfordshire.gov.uk

Date 27 January 2017

RE: 6/2016/2688/FULL - Yodel Hatfield Business Park, Frobisher Way, Hatfield, AL10 9TR

Dear Mark,

Thank you for consulting us on the application above for the re-configuration of parking areas to facilitate improved parking provision, at Yodel Hatfield Business Park, Frobisher Way, Hatfield, AL10 9TR.

We understand this application seeks full planning permission for a major development. The Lead Local Flood Authority considers the development site area as 6.76 hectares after consultation and confirmation by planning officer. We are happy to find *SUDS Statement* prepared by EAS dated November 2016 in support to this application. However this does not provide a suitable basis for 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.

As a Flood Risk Assessment is required under the NPPF for all Major Planning Applications as amended within the NPPG from the 6 April 2015, in order for us to advise the Local Planning Authority that there is no flood risk from surface water, it should include as a minimum:

1. Detailed calculations of existing surface water storage volumes and flows.
2. Topographical survey to metres AOD.
3. Full detailed drainage plan including location of SuDS measures.
4. Full details of any required mitigation measures of any identified source of flooding.
5. Detailed drawings of any proposed structures affecting ordinary watercourses and an impact assessment to demonstrate there will be no increase in flood risk.
6. Details of required maintenance of any SuDS features and structures and who will be adopting these features for the lifetime of the development.

Overcoming our objection

1. We note that the surface water drainage scheme already exist and is implemented for Hatfield Business Park. As this is a full planning application we would expect full details in relation to surface water storage volumes and flows to ensure that the proposed drainage strategy can attenuate for all rainfall events up to and including the 1 in 100 year plus climate change event. We require clarifications that the existing oversized pipes and offline ponds are able to receive additional runoff volume.
2. Topographical survey to metres AOD should be provided for any full application.
3. A detailed surface water drainage layout is required including the location of all SuDS features, pipe runs and existing surface water features overlain on the development layout along with all the corresponding detailed calculations. The drawing named PROPOSED SUDS STRATEGY does not provide suitable details (e.g. does not contains offline ponds).
- 4,5. The FRA should also include full detailed engineering drawings for SuDS measures, flood mitigation and management measures. We acknowledge that the FRA contains detailed drawing and management measures but they should be update and contain all existing SuDS features.

The applicant will need to satisfy the LPA that the proposed drainage scheme can be adopted and maintained for its lifetime by providing a maintenance plan, detailing key operations (including replacement if required) and management.

For further advice on what we expect to be contained within the surface water drainage assessment, please refer to our Developers Guide and Checklist on our surface water drainage webpage

<http://www.hertfordshire.gov.uk/services/envplan/water/floods/surfacewaterdrainage/>

Informative to the LPA

6. The proposed SuDS strategy stated that maintenance plan will be added to the existing maintenance schedule on site and that, as a final stage of surface water management, runoff will be discharged to the Ellen Brook.

To ensure that the LPA is in position to be satisfied that the proposed surface water attenuation features can be maintained for its lifetime, the FRA should include a detailed maintenance and management plan for the proposed drainage system. This should be prepared and be consistent with the latest edition of the SuDS manual (CIRIA C-753).

The applicant can overcome our objection by submitting a surface drainage assessment 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. Production of a Flood Risk Assessment will not in itself result in the removal of an objection.

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

reconsultation. Our objection will be maintained until an adequate FRA has been submitted.

Yours sincerely,

Julia Puton

Hertfordshire County Council

01992 556441

FRMConsultations@hertfordshire.gov.uk