

Director of Environment & Infrastructure:
Mark Kemp



David Elmore
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 15 April 2019

RE: 6/2019/0085/MAJ – Chancellors School, Pine Grove, Brookmans Park, Hatfield, AL9 7BN

Dear David,

Thank you for your re-consultation in relation to the above planning application for the erection of building comprising sports hall with associated changing facilities and 7 x classrooms built on existing hard play tennis courts; 4 x hard play sports pitches to be provided to replace existing; provision of 33 x parking spaces; and two mobile classrooms to be provided for the duration of the project, at Chancellors School, Pine Grove, Brookmans Park, Hatfield, AL9 7BN.

We understand this application seeks full planning permission for a major development, and we have assessed the Flood Risk Assessment and Drainage Strategy prepared by Ingent Consulting Engineers, dated March 2019 and the additional information submitted to support to this application. However, the information provided to date does not provide a suitable basis for an 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.

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. Therefore for the LLFA to be able to advise the Local Planning Authority that there is no flood risk from surface water an application for full planning permission should include the following:

1. Updated post development calculations in relation to surface water are to be carried out for all rainfall events up to and including the 1 in 100 year including 40% for climate change allowance.

2. Updated detailed drainage plan including location of SuDS measures, pipe runs and discharge points, informal flooding.
3. Evidence that if the applicant is proposing to discharge to the local sewer network, they have confirmation from the relevant water company that they have the capacity to take the proposed volumes and run-off rates.

Overcoming our objection

1. We acknowledge that the applicant has submitted a drainage strategy based on underground attenuation and discharge into the existing private surface water sewer on the school site. We note that the applicant intends to manage surface water run-off from the site for up to and including the 1 in 100 year rainfall including plus 40% for climate change event.

We understand that the proposed hard play sports pitches, the new sports centre and seven additional classrooms will be positively drained. These areas have been included in the modelling.

However, we note that the proposed parking spaces are not positively drained, as there is no existing drainage. We understand that an additional treatment stage will be proposed to manage any possible contamination arising from the proposed parking area.

We would advise the applicant that the proposed parking area should be entirely included in the modelling.

We are happy to find that the applicant intends to limit all the run-off from the site to 5 l/s. We would advise that this discharge rate should be applied to the entire development site.

Therefore, we would advise the applicant that the proposed modelling should be updated to include the above.

2. We acknowledge that the applicant has provided a drainage layout with indicated SuDS features proposed to manage the run-off from the proposed development.

Based on our comments included in point 1, we would advise the applicant that the drainage layout should be updated to include all the charges.

Moreover, we would advise that the proposed storage volumes should be indicated on the drainage scheme layout.

3. We understand that the applicant intends to connect into the existing private surface water sewer crossing the school site. We understand as well that the applicant intends to reduce the total discharge rate from the site.

However, we note that the final surface water discharge from the site is into the existing public surface water sewer.

If a discharge is proposed to a surface water sewer we require confirmation from Thames Water that they are satisfied to receive the proposed discharge at the proposed rates and volumes. As this is for a full planning application we require that this confirmation should be provided prior to the approval of planning permission to ensure that the proposed scheme is feasible. An agreement in principle rather than a formal permission at this stage would be acceptable.

Informative to the LPA

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.

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 surface water strategy has been submitted.

Yours sincerely,

Julia Puton
SuDS Officer
Hertfordshire County Council