

Director of Environment & Infrastructure:
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Date 08 March 2019

RE: 6/2019/0217/MAJ – Northaw House, Coopers Lane, Northaw, Potters Bar, EN6 4NG

Dear William,

Thank you for your consultation in relation to the above planning application for the conversion of Northaw House to form 11 apartments (including refurbishment of existing single caretaker's flat) and underground parking area, the Ballroom Wing to form 2 dwellings, the Stable Block to form 1 dwelling, refurbishment of existing dwelling at Oak Cottage, construction of 2 Gate Lodge dwellings, 3 dwellings within the Walled Garden, 7 dwellings within the Settlement Area, refurbishment of the Walled Garden, refurbishment of access routes and reinstatement of old route, provision of hard and soft landscaping, car parking and supporting infrastructure, at Northaw House, Coopers Lane, Northaw, Potters Bar, EN6 4NG.

We understand this application seeks full planning permission for a major development, and we have assessed the Drainage Strategy prepared by Peter Dann Limited, job number 10-8156, revision C, dated 17 December 2018 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. Evidence of a feasible discharge mechanism from the site.

2. An updated post-development modelling in relation to surface water for all rainfall events up to and including the 1 in 100 year including plus 40% an allowance for climate change.
3. An updated drainage layout.

Overcoming our objection

1. As the LLFA, we are happy with the principle of the proposed drainage strategy.

However, we note that the applicant has assumed the existence of a culvert, which is a final surface water discharge point from the site.

Therefore, we would advise that evidence of the positive connectivity into the existing ordinary watercourse running on the other side of the road should be provided.

The applicant should provide a sufficient confirmation that the proposed discharge location has a feasible discharge mechanism and that this will not increase flood risk on site and in the area.

2. We acknowledge that the applicant has provided a basic modelling for the proposed drainage strategy.

However, we would advise that a full network modelling should be submitted as an evidence to support the proposed drainage strategy.

Pre-development and post-development surface water calculations should take account of the whole site area not just impermeable areas. The runoff rates that are generated by the whole site should be provided, this should include all rainfall events up to and including the 1 in 100 year plus climate change event. Permeable areas will generate runoff at Greenfield rates, and this will need to be managed by the proposed drainage scheme therefore the required attenuation volumes and runoff rates should reflect this.

Moreover, we note that a permanent water volume (80m³) is being proposed within the proposed attenuation storage pond. Therefore, this volume should be excluded from the overall available surface water storage for the site run-off management. Based on that, we believe that the applicant should provide more storage volume to manage all the run-off from the proposed development.

3. We note that the applicant has provided a drainage layout.

However, we would advise the applicant that the entire development site should be taken into account. Therefore, it should be indicated how each development plot will be drained.

Moreover, drainage for the proposed roads and parking spaces should be clarified and identified as well.

Invert levels for the entire drainage network should be included as well.

Informative to the LPA

We would strongly advise the LPA that the applicant should provide appropriate evidence of positive connectivity from the site into an assumed culvert. Without appropriate evidence we are unable to state that the proposed development will not increase flood risk on site and off site.

The applicant can overcome our objection by submitting information 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 management scheme has been submitted.

Yours sincerely,

Julia Puton

SuDS Officer

Hertfordshire County Council