

Director of Environment & Infrastructure:
Mark Kemp



Sarah Smith
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 26 June 2019

RE: 6/2019/0857/MAJ – Stanborough Park, North Stanborough Park, Stanborough Road, AL8 6DF

Dear Sarah,

Thank you for your re-consultation in relation to the above planning application for the removal of existing children's playground and reinstatement of ground as parkland; Construction of new playground including splash pad with associated changing room facility; kiosk; fencing around compound; outdoor gym equipment; drainage, earthworks and landscaping, at Stanborough Park, North Stanborough Park, Stanborough Road, AL8 6DF.

We understand this application seeks full planning permission for a major development, and we have assessed the Flood Risk Review prepared by Conisbee, reference 171116/T Gavaza, version 1.4, dated 1st April 2019 and 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 modelling in relation to surface water for all rainfall events up to and including the 1 in 100 year return period including 40% for climate change allowance.
2. Clarification of the proposed access road drainage.

3. Details of any required maintenance of any SuDS features and structures and who will be adopting these features for the lifetime of the development. Please note that for residential development the lifetime is 100 years.

Overcoming our objection

1. We note that the applicant has submitted an updated drainage strategy that now includes two underground permavoid tanks.

We would advise that the applicant should provide an updated modelling to support the updated drainage strategy.

2. We note that the applicant has updated the site location drawing. We understand that now the existing access road is included within the application site boundary.

The applicant has not included any information on how the surface water run-off from the access road will be managed. Therefore, the applicant should clarify how they intend to drain the access road.

During the Surface Water Advisory Service, we have advised the applicant that, if the access road will be included within the application site boundary, appropriate surface water management strategy should be provided for the access road to reduce the existing flooding problems at this location.

The applicant should explain if there is an existing system, how it works and if it is intended to be used. The applicant must demonstrate if they intend to connect to the local surface water sewer that the relevant water company accepts the proposed discharge rate. As the LLFA, we need to ensure that all the opportunities to improve the situation on site and in the surroundings of the development have been considered.

3. As the proposed drainage strategy has been updated and new SuDS structures have been included, we would advise that the applicant should update their maintenance plan to include any new SuDS features.

Informative to the LPA

We recommend the LPA to obtain an updated maintenance plan that explains and follows the manufacturer's recommendations for maintenance or that it follows the guidelines explained by The SuDS Manual by CIRIA. Underground features are likely to carry a higher risk as a result of poor maintenance.

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