

Ashley Ransome  
Local Planning Authority  
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**Lead Local Flood Authority**  
**Post Point CHN 215**  
**Hertfordshire County Council**  
**County Hall, Pegs Lane**  
**HERTFORD SG13 8DN**

Contact Jessica Christie  
Email [FRMConsultations@hertfordshire.gov.uk](mailto:FRMConsultations@hertfordshire.gov.uk)

Date 28 April 2023

Dear Ashley

**RE: 6/2023/0444/COND – Land to the North-East of King George V playing fields, Northaw Road East, Cuffley, Hertfordshire EN6 4RD**

Thank you for consulting us on the above application received on 6 March 2023, for the submission of details pursuant to condition 6 (surface water drainage), on planning permission S6/2015/1342/PP for the residential development of up to 121 dwellings, associated infrastructure, and a change of use from agricultural land to an extension of the King George V playing field.

We **Object** to discharging condition 6 and note that condition 19 is related. No updated information has been provided since the LLFA commented on discharging condition 6 for application 6/2022/1774/RM on the 27 January 2023. Therefore, the following issues in relation to condition 6 still stand and updated information needs to be provided.

#### **Reason**

To prevent flooding in accordance with National Planning Policy Framework paragraph 167, 169 and 174 by ensuring the satisfactory management of local flood risk, surface water flow paths, storage, and disposal of surface water from the site in a range of rainfall events and ensuring the SuDS proposed operates as designed for the lifetime of the development.

We will consider reviewing this objection if the following issues are adequately addressed in relation to condition 6:

- In regard to condition 6 point 4 we require further information. We require justification as to whether the overland surface water flow path is considered separate from the drainage strategy or whether it will be accounted for in the strategy. In the applicants response to the LLFA objection, it is suggested that the 'overland surface water flows will be independent from the adoptable drainage system'. However, the applicant

further states that a 'low flow risk path flowing south from South Drive has been considered in the drainage strategy'. Despite being low risk, we would require suitable attenuation and storage to be accounted for with these volumes and flows to be accounted for in the drainage network modelling. If the overland surface water flow path from South drive is not part of the strategy, please clarify how this will be drained separately off the road and how it will not impact the proposed development and vulnerable areas such as residential dwellings.

- It is noted that cut off ditches are not being used, it is noted these were included to assist in the capture and management the surface water overland flow path originating off site that travels from north to south through the site. We request information how the flow path will be managed in detail; this is likely to require pre and post development modelling to demonstrate that there is no adverse risk of flooding and that the proposed development is safe for its lifetime.
- It is noted that the updated drainage calculations clarify that the sites discharge is limited to a surface water runoff rate of 8.2 l/s. However, in regard to the overland surface water flow path, the drainage storage calculations will need to be updated if the overland flow will be adopted to the strategy.
- Insufficient detail has been added to basin and swale drawings. We require, storage, volume, area and discharge rate to be included on these drawings.

Additional information has been submitted that addresses some of our concerns, these are:

- It is noted that FEH 2013 has been used, no further information is required.
- It is noted that finished floor levels have been added to drainage design, no further information is required.

### **Informative**

For further advice on what we expect to be contained within the FRA to support a planning application, please refer to our Developers Guide and Checklist on our surface water drainage webpage <https://www.hertfordshire.gov.uk/services/recycling-waste-and-environment/water/surface-water-drainage/surface-water-drainage.aspx> this link also includes HCC's policies on SuDS in Hertfordshire.

Erection of flow control structures or any culverting of an ordinary watercourse requires consent from the appropriate authority, which in this instance is Hertfordshire Lead Local Flood Authority and the Local Council (if they have specific land drainage bylaws). It is advised to discuss proposals for any works at an early stage of proposals.

In December 2022 it was announced FEH rainfall data has been updated to account for additional long term rainfall statistics and new data. As a consequence, the rainfall

statistics used for surface water modelling and drainage design has changed. In some areas there is a reduction in comparison to FEH2013 and some places an increase (see [FEH22 - User Guide \(hydrosolutions.co.uk\)](https://www.hydrosolutions.co.uk/)). Any new planning applications that have not already commissioned an FRA or drainage strategy to be completed, should use the most up to date FEH22 data. Other planning applications using FEH2013 rainfall, will be accepted in the transition period up to 1 April 2023. This includes those applications that are currently at and advanced stage or have already been submitted to the Local Planning Authority. For the avoidance of doubt the use of FSR and FEH1999 data has been superseded by FEH 2013 and 2022 and therefore, use in rainfall simulations are not accepted.

Please note if, you the Local Planning Authority review the application and decide to grant planning permission, you should notify the us, the Lead Local Flood Authority, by email at [FRMConsultations@hertfordshire.gov.uk](mailto:FRMConsultations@hertfordshire.gov.uk).

Yours sincerely

Jess

Jessica Christie  
SuDS and Watercourses Support Officer  
Environment & Transport and Sustainable Growth

## Annex

The following documents have been reviewed, which have been submitted to support the application;

- Surface Water Drainage report (Rev 3), prepared by Brookbanks, Ref: 10929/SWDR rev3, 12 January 2023

Condition 6 states:

*No development shall take place until a detailed surface water drainage scheme for the site based on the approved drainage strategy and sustainable drainage principles, has been submitted to and approved in writing by the local planning authority. The drainage strategy should demonstrate the surface water run-off generated up to and including 1 in 100 years + climate change critical storm will not exceed the run-off from the undeveloped site following the corresponding rainfall event. The scheme shall also include:*

- a) Detailed engineered drawings of the proposed SuDS features including cross section drawings, their size, volume, depth and any inlet and outlet features including any connecting pipe runs.*
- b) Final detailed post-development network calculations for all storm events up to and including the 1 in 100 year + 40% climate change storms with half drain down times no greater than 24 hours.*
- c) Assessment of the surface water flow path and the volumes to be managed as part of the development.*
- d) Exceedance flow routes for storm events greater than the 1 in 100 year + 40% climate change storm.*
- e) Final detailed management plan to include arrangements for adoption and any other arrangements to secure the operation of the scheme throughout its lifetime.*

*The mitigation measures shall be fully implemented prior to occupation and maintained in accordance with the timing / phasing arrangements embodied within the scheme, or within any other period as may subsequently be agreed, in writing, by the Local Planning Authority.*

*REASON: To reduce the risk and impact of flooding by ensuring the satisfactory storage and disposal of surface water from the site; and to ensure surface water can be managed in a sustainable manner in accordance with Policy R7 and R10 of the Welwyn Hatfield District Plan 2005; Policy SADM14 of the draft Local Plan Proposed Submission August 2016; and the National Planning Policy Framework.*

Condition 19 States:

*The development hereby permitted must be carried out in accordance with the approved Flood Risk Assessment prepared by Brookbanks reference 10710 FRA01 Rv0 dated 11*

*June 2021 and the following mitigation measures detailed within the Flood Risk Assessment:*

- *Limiting the surface water run-off generated by the critical storm events so that it will not exceed the surface water run-off rate of 8.2 l/s during the 1 in 100-year event plus 40% climate change event.*
- *Providing storage to ensure no increase in surface water run-off volumes for all rainfall events up to and including the 1 in 100 years + climate change event providing a minimum of 1,494 m<sup>3</sup> (or such storage volume agreed with the LLFA) of total storage volume in attenuation basin and swale.*
- *Discharge of surface water from the private drain into the ordinary watercourse south of the site.*

*The mitigation measures shall be fully implemented prior to occupation and maintained in accordance with the timing / phasing arrangements embodied within the scheme, or within any other period as may subsequently be agreed, in writing, by the Local Planning Authority.*

*REASON: To reduce the risk and impact of flooding by ensuring the satisfactory storage and disposal of surface water from the site; and to ensure surface water can be managed in a sustainable manner in accordance with Policy R7 and R10 of the Welwyn Hatfield District Plan 2005; Policy SADM14 of the draft Local Plan Proposed Submission August 2016; and the National Planning Policy Framework.*