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Lead Local Flood Authority
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Contact Jessica Christie
Email FRMConsultations@hertfordshire.gov.uk

Date 31 May 2023

Dear Ashley

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

Thank you for consulting us on the above application received on 10 May 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 this applicaiton in the absence of an acceptable supporting information in relation to discharging condition 6, and note that condition 19 is related. An amended flood risk assessment with modelling information has been provided, however, the following issues in relation to condition 6 still stand.

- Local flood risk to the proposed development from surface water flow paths originating offsite to the north flowing through the site and overwhelming the drainage scheme.
- Impacts from the proposed development adversely affecting flood risk elsewhere.
- The proposed development not being in accordance with NPPF, PPG and local policies SADM 14 of the Welwyn Hatfield Draft Local Plan 2016.

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 point 1:

It is noted that the applicant has provided pre and post development modelling to address the LLFA previous objection. However, upon review of the surface water flood modelling technical note, the following concerns need to be addressed:

- The rainfall catchment (polygon) for direct rainfall needs to be extended, as it does not provide an accurate representation of the full drainage catchment.
- Confirmation as to whether the railway underpass at the south-east extent of the site has been modelled, as this could potentially alter flow paths or downstream boundary.
- Provide evidence as to how the storm duration values were chosen and provide evidence as to which one is defined as the critical storm duration (which would likely be less than 6 hours).
- Provide a comparison of EA surface water maps alongside the surface water model baseline scenario. Surface water flooding depth difference maps between pre and post development should be provided to illustrate comparisons to help verify results and identify where flood risk is reduced or increased. Appropriate key with labels should be included.
- Provide methodology of how rainfall has been applied to the model and whether it considers permeable and impermeable areas separately. Provide clarity as to whether land uses have been separated or not.

The Drainage strategy drawing provided (10929-500-001) labels several drainage features including the outfall ditch and attenuation basins 'proposed', with 'proposed storage' attached. At this stage of planning all SuDS features and drainage outfalls should be 'Final'. We require storage volumes for the attenuation basins to be 'final', in order to satisfy concerns in regard to the overland surface water flow path risk.

We also require Finished Floor Levels to be added to drawings (10929-500-001) and (10929-500-004) to ensure that there is sufficient freeboard (300mm) above any above ground flooding.

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/FEH22-User-Guide)). 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 for 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.

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 4), prepared by Brookbanks, Ref: 10929/SWDR rev4, 18 April 2023.
- Surface Water Flood Modelling Technical Note (Rev 1), prepared by Brookbanks, Ref:10929-TN01, 19 April 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 m³ (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.