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Date 12 July 2019

**RE: 6/2018/3292/MAJ – 41 Broadwater Road, Welwyn Garden City, AL7 3AX**

Dear Sarah,

Thank you for your re-consultation in relation to the above planning application for the erection of four storey development comprising 91 x bed care home with 13 x care suites, at 41 Broadwater Road, Welwyn Garden City, AL7 3AX.

We understand this application seeks full planning permission for a major development, and we have assessed the Proposed Surface Water Drainage Strategy prepared by NJP Consulting Civil & Consulting Engineers Ltd, reference RN/10528, version 1.00, dated June 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 for the management of surface water drainage is required under the NPPF for all Major Planning Applications as amended within the NPPG from the 6 April 2015. The applicant should therefore provide a surface water drainage strategy that includes the following:

1. Further information on the submitted drainage strategy and provided infiltration test results.
2. Updated, detailed post-development modelling in relation to surface water for all rainfall events up to and including the 1 in 100 year return period including an appropriate allowance for climate change.
3. Updated maintenance plan for the proposed SuDS features included within the drainage strategy.

## Overcoming our objection

1. We acknowledge that the applicant has submitted a drainage strategy based on permeable paving, deep wells with infiltration into the ground and discharge into the public surface water sewer at 2 l/s.

We note that a hydrobrake feature is being proposed to limit surface water discharge from permeable paving area. However, we note as well that additional connection from the access road has been included on the drainage layout. Therefore, our understanding is that the final discharge from the site exceeds 2 l/s. We would advise that the applicant should clarify this.

Based on the provided infiltration test results, as the LLFA we would base the modelling on the worst obtained infiltration results. Therefore, we would consider that infiltration is not viable on the site.

Moreover, as we would consider that deep bore soakaways are being proposed, we would advise that deep bore soakaway falling head test should be undertaken. Contamination survey should as well be undertaken on site. Location of the proposed deep bores should be appropriately assessed.

We note that groundwater has been identified at 1.5 m below ground levels. This should be clarified by the applicant, as we understand that infiltration is being proposed between 3 to 4 metres below ground level.

As the Lead Local Flood Authority, it is our responsibility to assess the acceptance of any soakaway included as part of a SuDS scheme with respect to its ability to effectively discharge through infiltration to the ground. However, from a water resources and quality standpoint for deep bores, you should contact the Environment Agency as to the suitability of this method of discharge at this location.

2. We note that the applicant has submitted calculations for the proposed drainage strategy for up to and including the 1 in 100 year event including 30% for climate change. As we would consider that the proposed development is for residential care home, plus 40% for climate change allowance should be taken into account.

Therefore, the applicant should clarify the lifespan of the proposed development.

We note that the submitted modelling includes permeable paving feature with direct infiltration into the ground. As stated in the report, shallow infiltration does not work on the site and therefore deep bores are being considered. Therefore, we would advise the applicant that appropriate modelling should be submitted.

3. We note that a basic maintenance plan for permeable paving has been provided.

However, we would advise that a maintenance plan should include all SuDS features included within the strategy. The maintenance of soakaways structures must be appropriate to prevent the risk of failure. Underground and any

mechanical features are likely to carry a higher risk as a result of poor maintenance.

### **Informative to the LPA**

As the applicant has included deep bore infiltration features with the proposed strategy, we would advise the LPA that Environment Agency should be consulted to assess the suitability of this method of discharge at this location.

We recommend the LPA to obtain an updated maintenance plan including all SuDS features that explains and follows the manufacturer's recommendations for maintenance or that it follows the guidelines explained by The SuDS Manual by CIRIA. A maintenance plan should also include an inspection timetable with long term action plans to be carried out to ensure efficient operation and prevent failure.

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  
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