

Director of Environment & Infrastructure:
Mark Kemp



Marie Laidler
Broxbourne Borough Council
Borough Offices
Bishops' College
Churchgate
Cheshunt
EN8 9XB

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

Contact David Uncle
Email FRMConsultations@hertfordshire.gov.uk

Date 27 May 2021

RE: 07/21/0519/F – Homebase Ltd, Sturlas Way, Waltham Cross, EN8 7BF

Dear Marie,

Thank you for your consultation on the Refurbishment, extension and external alterations to existing non-food retail unit to enable it to trade as part foodstore and part non-food retail unit, alongside modifications to existing external garden centre, car parking layout, landscaping and other associated site works at Homebase Ltd, Sturlas Way, Waltham Cross, EN8 7BF.

We have reviewed the Flood Risk Assessment prepared by Webb Yates Engineers Ltd, reference B1299-C-RP-0001, Revision 00, Status S9.

We are pleased the FRA states the inclusion of SuDS is a key consideration and that the design of the surface water system shall be implemented following the drainage hierarchy and SuDS management train, and an indicative Drainage Assessment Layout has been provided. It is proposed to drain the new vehicle loading ramp via a channel drain and petrol interceptor to the existing surface water system draining the car park.

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. Clarification of car park proposals.
2. Details of existing drainage on site.

3. Justification of SuDS selection.

Overcoming our objection

1. We understand the car parking layout is to be altered to provide 157 shared car parking spaces, and with updated below ground infrastructure to provide electric vehicle charging points.

Please could the applicant confirm if the car park is to be resurfaced as part of the development. If the car park is proposed to be resurfaced, we would question why permeable paving could not be implemented to provide SuDS management and treatment without needing the use of petrol interceptors etc.

2. We understand it is proposed to drain the extension to the store including loading ramp via a channel drain with petrol interceptor to the existing car park drainage. However, there is not much detail of the existing system on site.

Please could the applicant provide details of the existing system including its exact point of connection to its discharge point. We would be concerned that the system discharges freely as per paragraph 6.1.

3. We are pleased paragraph 6.2 of the FRA states that a SuDS management train will be implemented as per the SuDS Manual 2015, however this is not apparent in the proposals.

As per point 1, we would be concerned with the use of petrol interceptors and the applicant should seek to provide SuDS management and treatment through the use of above-ground SuDS, such as permeable paving or filter drains etc.

If this cannot be achieved, we would expect detailed technical justification.

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.

Informative to the LPA

We ask to be re-consulted with any additional information the applicant may submit. We will provide you with bespoke comments within 21 days of receiving a formal re-consultation. Our objection will be maintained until an adequate surface water drainage assessment has been submitted.

Please note that if the LPA decides to grant planning permission we wish to be notified for our records.

Yours sincerely,

David Uncle
SuDS Officer
Environmental Resource Planning