

Representations can be made using this form:

Please return to Hertsmere Borough Council by 5pm on 31st March 2014

By post: Policy and Transport team, Planning and Building Control Unit,
Hertsmere Borough Council, Elstree Way, Borehamwood, Herts, WD6 1WA

By email: elsteewaycorridor@hertsmere.gov.uk

This form has two parts:

Part A – Personal details (only needed once)

Part B – Your representation(s). Please complete a separate sheet for **every** representation you wish to make, remembering to insert your name or organisation's name.

Please read the guidance notes before completing this form.

PART A

	1. Personal details*	2. Agent details (if applicable)
Title	Mr	
First name	David	
Last name	Palmer	
Job title (where relevant)	Planning Advisor	
Organisation (where relevant)	Environment Agency	
Address	Apollo Court, 2 Bishops Square Business Park, Hatfield	
Post Code	AL10 9EX	
Telephone number	01707 632491	
Email address	SPHatfield@environment-agency.gov.uk	

*If an agent is appointed, please enter the person and/or organisation being represented in column 1 and complete all contact details in column 2

Please note that all representations received will be made publically available and cannot be treated as confidential.

Part B

Please use a separate sheet for each representation

Name or organisation: Environment Agency

<u>For office use only</u> Ref No: support: object: omission:

3. To which part of the Area Action Plan does this representation relate?

Paragraph Policy

4. Do you consider the Area Action Plan is:

(1) Legally Compliant Yes No

(2) Sound Yes No

If you have entered 'no' to 4(2), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the Area Action Plan is unsound because it is not:

(1) Justified

(2) Effective

(3) Consistent with national policy

6. Please give details of your answer to question 4 or 5 and why you have responded in this way .

4.18

While we support the initiative in this paragraph to enhance the environment of Maxwell Park, this should include enhancements to the ordinary watercourse running through the park.

This would make the plan more compliant with the National Planning Policy Framework (NPPF) Paragraph 109 and 114, and the National Planning Practice Guidance (NPPG) on Climate Change, and the Natural Environment.

(continue on a separate sheet if necessary)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

7. Please set out what change(s) you consider necessary to make the Area Action Plan legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the Area Action Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Include enhancements to the watercourse. This would make the plan more compliant with the National Planning Policy Framework (NPPF) Paragraph 109 and 114, and the National Planning Practice Guidance (NPPG) on Climate Change, and the Natural Environment.

(continue on a separate sheet if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

We would be willing to appear to help the inspector reach their decision.

(continue on a separate sheet if necessary)

Please note the inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature: David Palmer

Date: 31/03/2014

If you wish to be informed of the date of the submission of the document to the Secretary of State, please tick this box

GUIDANCE NOTES

Introduction

These guidance notes have been produced to assist anyone who wishes to make a formal representation on the published Elstree Way Corridor Area Action Plan submission document, which is subject to a period of representations from 17th February 2014 to 31st March 2014. The Area Action Plan is published in order for representations to be made prior to the submission for public examination. The representations will be considered alongside the submitted Area Action Plan, by a independent Planning Inspector.

The Planning and Compulsory Purchase Act 2004¹ (the 2004 Act) states that the purpose of the examination is to consider whether the Area Action Plan complies with legal requirements and is 'sound'. The representations supporting, objecting or commenting more generally should be made within this context.

Soundness

Soundness is explained fully in the National Planning Policy Framework², in paragraph 182. The Inspector has to be satisfied that the Area Action Plan has been positively prepared, is justified, effective and consistent with national policy. To be sound the Area Action Plan should be:

Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;

Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;

Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and

Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

- 1) If you are seeking to make representations on the way in which the Local Planning Authority (LPA) has prepared the published Area Action Plan it is likely that your comments or objections will relate to a matter of legal compliance.
- 2) If it is the actual content on which you wish to comment or object it is likely it will relate to whether the Area Action Plan is justified, effective or consistent with national policy.

Please note that all respondents must complete their personal details as it is not possible for representations to be considered anonymously. Respondents should also note that representations are not confidential and that they will be published on the Council's website and copies will be placed at appropriate venues across the borough for public inspection, although the names and addresses of representations from individuals will be removed.

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- The Area Action Plan should comply with the Town and County Planning (Local Planning) (England) Regulations 2012³. On publication, the Council must publish the documents prescribed in the regulations, and make them available at their principal offices and on their website. The Council notify statutory consultees and any persons who have requested to be notified.
- The Council is required to publish a Sustainability Appraisal Report when they publish the Area Action Plan. This should identify the process by which the Sustainability Appraisal has been carried out, and the baseline information used to inform the process and the outcomes of that process. Sustainability Appraisal is a tool for appraising policies to ensure they reflect social, environmental, and economic factors.
- The Area Action Plan should have regard to national policy.

General advice

Representations are only valid if your name and address are supplied. Agents should please state the full name or organisation of who they are representing.

If you wish to make a representation seeking a change to a Area Action Plan or part of an Area Action Plan you should make clear in what way the Area Action Plan or part of the Area Action Plan is not sound having regard to the legal compliance check and four tests set out above.

You should try to support your representation by evidence showing why the Area Action Plan should be changed. It will be helpful if you also say precisely how you think the Area Action Plan should be changed. Representations should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further submissions based on the original representation made at publication. After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

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Organisation (where relevant)	Environment Agency	
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Part B

Please use a separate sheet for each representation

Name or organisation: Environment Agency

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Ref No:
support:
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3. To which part of the Area Action Plan does this representation relate?

Paragraph	2.5 – Objectives of the AAP	Policy	
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4. Do you consider the Area Action Plan is:

(1) Legally Compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>

If you have entered 'no' to 4(2), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the Area Action Plan is unsound because it is not:

(1) Justified	<input type="checkbox"/>
(2) Effective	<input type="checkbox"/>
(3) Consistent with national policy	<input checked="" type="checkbox"/>

6. Please give details of your answer to question 4 or 5 and why you have responded in this way .

We would like to see the vision and objectives specifically refer to environmental improvements. The importances of these are mentioned in paragraph 2.3 but this is not clearly carried over to the Vision.

The objectives should include the following:

- 1. Environmental enhancement of Maxwell Park, including the ordinary watercourse the Maxwell Road Drain that runs through the Park.**
This would provide biodiversity, water quality and amenity improvements and would help in achieving SA objective 12 (protect and enhance wildlife), 13 (improve water quality). This watercourse falls under the Tykeswater Water Framework Directive catchment, which is classed as having 'Good Ecological Value'. It is important this classification is maintained and the APP has a key role to play in this.
- 2. The deculverting of culverted sections of the Maxwell Road Drain, where appropriate, and the environmental enhancement of the River.**
The watercourse is listed as a culverted main river upon leaving Maxwell Park. Watercourses must be appropriately considered within any re-development proposals. It may not be feasible to open up the culverted watercourse for its whole length within the Action Plan Area, but it should be considered on any redevelopment proposal and mitigation or off site compensation should be provided

where it is not possible. This would help in achieving SA objective 12 (protect and enhance wildlife), 13 (improve water quality) and 15 (minimize risk of flooding) . Both this and the enhancement of the watercourse in the Park would help meet the recommendation given in the SA for Policy CS22 Elstree Way Corridor recommendation for SA objective 12. This reads '*Biodiversity and green infrastructure enhancement measures should be actively encouraged in the AAP. The potential for local biodiversity should be considered before and during any construction activities.*' As mentioned earlier, this watercourse falls under the Tykeswater Water Framework Directive catchment, which is classed as having 'Good Ecological Value'. It is important this classification is maintained and the APP has a key role to play in this.

This would make the plan more compliant with the National Planning Policy Framework (NPPF) Paragraph 109 and 114, and the National Planning Practice Guidance (NPPG) on Climate Change, and the Natural Environment.

(continue on a separate sheet if necessary)

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We would like to see the vision and objectives specifically refer to environmental improvements. The importances of these are mentioned in paragraph 2.3 but this is not clearly carried over to the Vision.

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- 2. The deculverting of culverted sections of the Maxwell Road Drain, where appropriate, and the environmental enhancement of the River.** The watercourse is listed as a culverted main river upon leaving Maxwell Park. Watercourses must be appropriately considered within any re-development proposals. It may not be feasible to open up the culverted watercourse for its whole length within the Action Plan Area, but it should be considered on any redevelopment proposal and mitigation or off site compensation should be provided where it is not possible. This would help in achieving SA objective 12 (protect and enhance wildlife), 13 (improve water quality) and 15 (minimize risk of flooding) . Both this and the enhancement of the watercourse in the Park would help meet the recommendation given in the SA for Policy CS22 Elstree Way Corridor recommendation for SA objective 12. This reads '*Biodiversity and green infrastructure enhancement measures should be actively encouraged in the AAP. The potential for local biodiversity should be considered before and during any construction activities.*' As mentioned earlier, this watercourse falls under the Tykeswater Water Framework Directive catchment, which is classed as having 'Good Ecological Value'. It is important this classification is maintained and the APP has a key role to play in this.

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9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

We would be willing to appear to help the inspector reach their decision.

(continue on a separate sheet if necessary)

Please note *the inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.*

Signature: David Palmer **Date:** 31/03/2014

X

If you wish to be informed of the date of the submission of the document to the Secretary of State, please tick this box

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Ref No:

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Policy EWC9 – Developer Contributions

Developer contributions should also be put towards the enhancement of the Maxwell Road Drain Main river, where appropriate through deculverting. Please see our comment for the Strategic Vision and objectives to support this.

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Organisation (where relevant)	Environment Agency	
Address	Apollo Court, 2 Bishops Square Business Park, Hatfield	
Post Code	AL10 9EX	
Telephone number	01707 632491	
Email address	SPHatfield@environment-agency.gov.uk	

*If an agent is appointed, please enter the person and/or organisation being represented in column 1 and complete all contact details in column 2

Please note that all representations received will be made publically available and cannot be treated as confidential.

Part B

Please use a separate sheet for each representation

Name or organisation: Environment Agency

For office use only
Ref No:
support:
object:
omission:

3. To which part of the Area Action Plan does this representation relate?

Paragraph	<input type="text"/>	Policy	EWC1 – Development Strategy
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4. Do you consider the Area Action Plan is:

(1) Legally Compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>

If you have entered 'no' to 4(2), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the Area Action Plan is unsound because it is not:

(1) Justified	<input type="checkbox"/>
(2) Effective	<input type="checkbox"/>
(3) Consistent with national policy	<input checked="" type="checkbox"/>

6. Please give details of your answer to question 4 or 5 and why you have responded in this way .

Policy EWC1 – Development Strategy

We expect that development proposals should also:

- 1. Reduce flood risk and improve water quality.** The Strategic Flood Risk Assessment produced by the Council identified an area of functional floodplain adjacent to the Maxwell Road Drain main river watercourse of 20 metres either side of the watercourse. The justification for this is identified within the Strategic Flood Risk Assessment. In addition to this, the flood risk implications of the development proposals outlined would need to be assessed by producing an appropriate Flood Risk Assessment. This would need to be carried out before the development can be fully detailed so that all aspects of flood risk can be considered and used to determine the most favourable layout. A preliminary drainage design strategy should be carried out at the outset to identify the options for the design of the surface water drainage system and how it will affect the site layout. Applicants should demonstrate how the principles of Sustainable Drainage Systems have been applied to the development. There are a number of solutions for the control of surface water run-off. These techniques not only cater for flood peak attenuation, but may also improve water quality and enhance the environment. Such systems include using ponds, permeable pavements, grassed swales, infiltration trenches, and soakaways. All development should achieve Greenfield run off rates. The

inclusion of this would help in achieving SA objective 12 (protect and enhance wildlife), 13 (improve water quality) and 15 (minimize risk of flooding).

2. **Encourage biodiversity and include sustainable features** – these should include green roofs, water efficiency etc. This would help in achieving SA objective 12 (protect and enhance wildlife), 13 (improve water quality) and 15 (minimize risk of flooding).
3. **Provide for redesigned and improved Maxwell Park (including the watercourse) and additional open space.** This is referenced in paragraph 3.3 (e) and this should be clearly translated into the policy. This would help in achieving SA objective 12 (protect and enhance wildlife), 13 (improve water quality) and 15 (minimize risk of flooding).
4. **Provide opportunities for the deculverting of the Maxwell Road Main river.** An eight metre buffer strip should be left free from development along the course of the Maxwell Road Drain Main river. This would allow for the deculverting of sections of this watercourse upon redevelopment.

This would make the plan more compliant with the National Planning Policy Framework (NPPF) Paragraph 99, 109 and 114, and the National Planning Practice Guidance (NPPG) on Climate Change, and the Natural Environment.

(continue on a separate sheet if necessary)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

7. Please set out what change(s) you consider necessary to make the Area Action Plan legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the Area Action Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Policy EWC1 – Development Strategy

We expect that development proposals should also:

- 1. Reduce flood risk and improve water quality.** The Strategic Flood Risk Assessment produced by the Council identified an area of functional floodplain adjacent to the Maxwell Road Drain main river watercourse of 20 metres either side of the watercourse. The justification for this is identified within the Strategic Flood Risk Assessment. In addition to this, the flood risk implications of the development proposals outlined would need to be assessed by producing an appropriate Flood Risk Assessment. This would need to be carried out before the development can be fully detailed so that all aspects of flood risk can be considered and used to determine the most favourable layout. A preliminary drainage design strategy should be carried out at the outset to identify the options for the design of the surface water drainage system and how it will affect the site layout. Applicants should demonstrate how the principles of Sustainable Drainage Systems have been applied to the development. There are a number of solutions for the control of surface water run-off. These techniques not only cater for flood peak attenuation, but may also improve water quality and enhance the environment. Such systems include using ponds, permeable pavements, grassed swales, infiltration trenches, and soakaways. All development should achieve Greenfield run off rates. The inclusion of this would help in achieving SA objective 12 (protect and enhance wildlife), 13 (improve water quality) and 15 (minimize risk of flooding).
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This would make the plan more compliant with the National Planning Policy Framework (NPPF) Paragraph 99, 109 and 114, and the National Planning Practice Guidance (NPPG) on Climate Change, and the Natural Environment.

(continue on a separate sheet if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

We would be willing to appear to help the inspector reach their decision.

(continue on a separate sheet if necessary)

Please note *the inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.*

Signature: David Palmer

Date: 31/03/2014

If you wish to be informed of the date of the submission of the document to the Secretary of State, please tick this box

GUIDANCE NOTES

Introduction

These guidance notes have been produced to assist anyone who wishes to make a formal representation on the published Elstree Way Corridor Area Action Plan submission document, which is subject to a period of representations from 17th February 2014 to 31st March 2014. The Area Action Plan is published in order for representations to be made prior to the submission for public examination. The representations will be considered alongside the submitted Area Action Plan, by a independent Planning Inspector.

The Planning and Compulsory Purchase Act 2004¹ (the 2004 Act) states that the purpose of the examination is to consider whether the Area Action Plan complies with legal requirements and is 'sound'. The representations supporting, objecting or commenting more generally should be made within this context.

Soundness

Soundness is explained fully in the National Planning Policy Framework², in paragraph 182. The Inspector has to be satisfied that the Area Action Plan has been positively prepared, is justified, effective and consistent with national policy. To be sound the Area Action Plan should be:

Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;

Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;

Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and

Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

- 1) If you are seeking to make representations on the way in which the Local Planning Authority (LPA) has prepared the published Area Action Plan it is likely that your comments or objections will relate to a matter of legal compliance.
- 2) If it is the actual content on which you wish to comment or object it is likely it will relate to whether the Area Action Plan is justified, effective or consistent with national policy.

Please note that all respondents must complete their personal details as it is not possible for representations to be considered anonymously. Respondents should also note that representations are not confidential and that they will be published on the Council's website and copies will be placed at appropriate venues across the borough for public inspection, although the names and addresses of representations from individuals will be removed.

¹ View the Planning Act online at <http://www.legislation.gov.uk/ukpga/2004/5/contents>

² View the National Planning Policy Framework online at https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

Legal Compliance

The Inspector will first check that the Area Action Plan meets the legal requirements under Section 20(5)(a) of the 2004 Act before moving on to test for soundness. You should consider the following before making representation on a legal compliance:

- The Area Action Plan should be within the current Local Development Scheme (LDS) and the key stages should have been followed. The LDS is effectively a programme of work prepared by the Council, setting out the documents it proposes to produce over a set period. It sets out the key stages in the production of any documents the Council propose to bring forward for independent examination. The LDS is published on the Council's website and available at their main offices.
- The process of community involvement for the Area Action Plan should be in general accordance with the Council's Statement of Community Involvement (SCI). The SCI is a document that sets out the Council's strategy for involving the community in the preparation and revision of planning documents and the consideration of planning applications.
- The Area Action Plan should comply with the Town and County Planning (Local Planning) (England) Regulations 2012³. On publication, the Council must publish the documents prescribed in the regulations, and make them available at their principal offices and on their website. The Council notify statutory consultees and any persons who have requested to be notified.
- The Council is required to publish a Sustainability Appraisal Report when they publish the Area Action Plan. This should identify the process by which the Sustainability Appraisal has been carried out, and the baseline information used to inform the process and the outcomes of that process. Sustainability Appraisal is a tool for appraising policies to ensure they reflect social, environmental, and economic factors.
- The Area Action Plan should have regard to national policy.

General advice

Representations are only valid if your name and address are supplied. Agents should please state the full name or organisation of who they are representing.

If you wish to make a representation seeking a change to a Area Action Plan or part of an Area Action Plan you should make clear in what way the Area Action Plan or part of the Area Action Plan is not sound having regard to the legal compliance check and four tests set out above.

You should try to support your representation by evidence showing why the Area Action Plan should be changed. It will be helpful if you also say precisely how you think the Area Action Plan should be changed. Representations should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further submissions based on the original representation made at publication. After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

³ View the Planning Regulations online at <http://www.legislation.gov.uk/ukxi/2012/767/contents/made>

Where there are groups who share a common view on how they wish to see the Area Action Plan changed, it would be very helpful for that group to send a single representation which represents the view, rather than for a large number of individuals to send in separate representations which repeat the same points. In such cases the group should indicate how many people it is representing and how the representation has been authorised.

Matthew Wilson
Planning Policy
Hertsmere Borough Council
Civic Offices Elstree Way
Borehamwood
Hertfordshire
WD6 1WA

Our ref: NE/2013/117159/01-L01
Your ref: EWC/1/MW
Date: 28 February 2013

Dear Matthew

Elstree Way Corridor Area Action Plan - Public Consultation

Thank you for consulting us on the Elstree Way Corridor Area Action Plan (AAP) and for agreeing to an extension to reply to this.

Strategic Vision & Objectives

We would like to see the vision and objectives specifically refer to environmental improvements. The importance of these are mentioned in paragraph 2.3 but this is not clearly carried over to the Vision.

The objectives should include the following:

- 1. Environmental enhancement of Maxwell Park, including the ordinary watercourse the Maxwell Road Drain that runs through the Park.** This would provide biodiversity, water quality and amenity improvements and would help in achieving SA objective 12 (protect and enhance wildlife), 13 (improve water quality). This watercourse falls under the Tykeswater Water Framework Directive catchment, which is classed as having 'Good Ecological Value'. It is important this classification is maintained and the APP has a key role to play in this.
- 2. The deculverting of culverted sections of the Maxwell Road Drain, where appropriate, and the environmental enhancement of the River.** The watercourse is listed as a culverted main river upon leaving Maxwell Park. Watercourses must be appropriately considered within any re-development proposals. It may not be feasible to open up the culverted watercourse for its whole length within the Action Plan Area, but it should

Environment Agency
Apollo Court, 2 Bishops Square Business Park, St Albans Road West, Hatfield, Herts, AL10 9EX.
Customer services line: 08708 506 506
Email: enquiries@environment-agency.gov.uk
www.environment-agency.gov.uk



be considered on any redevelopment proposal and mitigation or off site compensation should be provided where it is not possible. This would help in achieving SA objective 12 (protect and enhance wildlife), 13 (improve water quality) and 15 (minimize risk of flooding) . Both this and the enhancement of the watercourse in the Park would help meet the recommendation given in the SA for Policy CS22 Elstree Way Corridor recommendation for SA objective 12. This reads '*Biodiversity and green infrastructure enhancement measures should be actively encouraged in the AAP. The potential for local biodiversity should be considered before and during any construction activities.*' As mentioned earlier, this watercourse falls under the Tykeswater Water Framework Directive catchment, which is classed as having 'Good Ecological Value'. It is important this classification is maintained and the APP has a key role to play in this.

Policy EWC1 – Development Strategy

We expect that development proposals should also:

- 1. Reduce flood risk and improve water quality.** The Strategic Flood Risk Assessment produced by the Council identified an area of functional floodplain adjacent to the Maxwell Road Drain main river watercourse of 20 metres either side of the watercourse. The justification for this is identified within the Strategic Flood Risk Assessment. In addition to this, the flood risk implications of the development proposals outlined would need to be assessed by producing an appropriate Flood Risk Assessment. This would need to be carried out before the development can be fully detailed so that all aspects of flood risk can be considered and used to determine the most favourable layout. A preliminary drainage design strategy should be carried out at the outset to identify the options for the design of the surface water drainage system and how it will affect the site layout. Applicants should demonstrate how the principles of Sustainable Drainage Systems have been applied to the development. There are a number of solutions for the control of surface water run-off. These techniques not only cater for flood peak attenuation, but may also improve water quality and enhance the environment. Such systems include using ponds, permeable pavements, grassed swales, infiltration trenches, and soakaways. All development should achieve Greenfield run off rates. The inclusion of this would help in achieving SA objective 12 (protect and enhance wildlife), 13 (improve water quality) and 15 (minimize risk of flooding).
- 2. Encourage biodiversity and include sustainable features** – these should include green roofs, water efficiency etc. This would help in achieving SA objective 12 (protect and enhance wildlife), 13 (improve water quality) and 15 (minimize risk of flooding).
- 3. Provide for redesigned and improved Maxwell Park (including the watercourse) and additional open space.** This is referenced in paragraph 3.3 (e) and this should be clearly translated into the policy. This would help in achieving SA objective 12 (protect and enhance wildlife), 13 (improve water quality) and 15 (minimize risk of flooding).

4. **Provide opportunities for the deculverting of the Maxwell Road Main river.** An eight metre buffer strip should be left free from development along the course of the Maxwell Road Drain Main river. This would allow for the deculverting of sections of this watercourse upon redevelopment.

Policy EWC5 – Supporting Community Facilities

1. We support paragraph 4.16 to enhance the environment of Maxwell Park. This should include the ordinary watercourse.

Policy EWC10 – Developer Contributions

1. Developer contributions should also be put towards the enhancement of the Maxwell Road Drain Main river, where appropriate through deculverting. Please see our comment for the Strategic Vision and objectives to support this.

I hope this is helpful. We'd be very happy to discuss any of the suggestions above and provide further details on specific actions for the watercourses.

Please let me know if you have any questions.

Yours sincerely

Deborah Simons
Technical Planner
Sustainable Places

Direct dial 01707 632407
Direct e-mail SPHatfield@environment-agency.gov.uk