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Contact Tanvisha Bakhale
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Date 27 March 2023

Dear Raymond

RE: 6/2022/2220/COND – Stadium Service Station, Stanborough Road, Welwyn Garden City AL8 6XA

Thank you for your reconsultation on the above site, received on 3 March 2023. We have reviewed the application as submitted.

It is understood that the applicant submitted a full planning application (planning reference: 6/2021/2260/FULL) for the redevelopment of an existing petrol station; including demolition of existing sales building, canopy link and car wash/jet washes, erection of a new sales building, provision of car parking spaces, provision of EV charging bays and associated plant, erection of a new bin store, retention of forecourt and canopy, and associated works in July 2021. It is understood that the full application was approved by way of a decision notice and subject to conditions on 14 June 2022.

We understand the applicant has submitted the above application as re-consultation for discharging conditions 1,2 and 17 which are either linked directly or indirectly to flood risk, surface water management and drainage.

Condition 1 of planning application 6/2021/2260/FULL states the following:

'No development shall commence until a Construction Management Plan has been submitted to and approved in writing by the Local Planning Authority, including elements of the CLOCS standards as set out in the Highway Authority's Construction Management template. Thereafter the construction of the development shall only be carried out in accordance with the approved Plan: The Construction Management Plan / Statement shall include details of:

- a) *Construction vehicle numbers, type, routing.*
- b) *Access arrangements to the site;*
- c) *Traffic management requirements;*

- d) *Construction and storage compounds (including areas designated for car parking, loading / unloading and turning areas);*
- e) *Siting and details of wheel washing facilities.*
- f) *Cleaning of site entrances, site tracks and the adjacent public highway;*
- g) *Timing of construction activities (including delivery times and removal of waste) and to avoid school pick up/drop off times.*
- h) *Provision of sufficient on-site parking prior to commencement of construction activities;*
- i) *Post construction restoration/reinstatement of the working areas and temporary access to the public highway;*
- j) *where works cannot be contained wholly within the site a plan should be submitted showing the site layout on the highway including extent of hoarding, pedestrian routes and remaining road width for vehicle movements;*
- k) *Phasing Plan.*

REASON: In order to protect highway safety and the amenity of other users of the public highway and rights of way in accordance with Policies 5, 12, 17 and 22 of Hertfordshire's Local Transport Plan (adopted 2018) and Policy SADM2 of the Emerging Welwyn Hatfield Local Plan 2016.'

Condition 2 of planning application 6/2021/2260/FULL states the following:

'No development shall take place until a detailed surface water drainage scheme for the site based on the principles of the approved drainage strategy and sustainable drainage principles, has been submitted to and approved in writing by the Local Planning Authority in consultation with the Lead Local Flood Authority. The scheme shall subsequently be implemented in accordance with the approved details before the development is completed. The scheme shall include:

- 1) *An assessment with appropriate evidence to discharge surface water runoff from the development site into an existing into a public surface water sewer.*
- 2) *Final, detailed drainage layout plan showing all piped networks and SuDS features, identified invert levels, as well as a final discharge point into an existing ordinary watercourse or a public sewer. Should be updated in line with a final red line boundary of the development site.*
- 3) *Final network modelling based on an appropriate discharge mechanism for all rainfall events up to and including the 1 in 100-year rainfall including 40% for climate change allowance. As the final discharge rate 5 l/s should be considered. If a higher rate will be proposed, a strong technical justification will have to be provided.*
- 4) *Detailed engineered drawings of the proposed SuDS (permeable paving, swales, pond) and drainage features including cross and long section drawings, size, volume, depth and any inlet and outlet features details including any connecting pipe runs.*
- 5) *Details regarding any areas of informal flooding to be shown on a plan with estimated extent areas, flooding volumes and depths based on the proposed layout and topography of the site.*

- 6) *An assessment of any surface water runoff flows exceeding the designed 1 in 100 year event including 40% for climate change allowance.*
- 7) *Maintenance and management plan to include the final land ownership plan, arrangements for adoption and any other arrangements to secure the operation of the scheme throughout its lifetime.*

REASON: To prevent flooding by ensuring the satisfactory storage of/disposal of surface water from the site for the lifetime of the development and to protect the surrounding environment from flooding in accordance with Policies R7 of the Welwyn Hatfield District Plan 2005 and the National Planning Policy Framework.'

Recognising the above, we have assessed the information listed within the Annex (as below) to inform the following response. The following comments provided by the LLFA within the response below, relate solely to Condition 1, 2 and 17 of the approved full planning application (planning reference: 6/2021/2260/FULL).

Acknowledging the above, the information provided to date does not provide a suitable basis for an assessment to be made on the flood risk arising from the proposed development. In the absence of a suitable construction management plan and drainage design details, **we are not able to recommend the discharge of condition 2** of the approved full planning application (planning reference: 6/2021/2260/FULL) as information is still required to support the review. Therefore, the proposed development currently does not comply with NPPF and the following local policy:

- Policy SP 10 Sustainable design and construction
- Policy SADM 14 Flood Risk and Surface Water Management

However, the information submitted for Conditions 1 and Condition 17 is in satisfactory and we are able to recommend the discharge of Condition 1 and 17.

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:

Condition 2:

1. As per point 1 of condition 2, it is noted that the applicant has submitted the confirmation that Thames water agree in principle to a connection to discharge the flows into their network, but the notice submitted by Thames water also states that the connection must not be used to discharge any drainage-related planning conditions and requires the applicant to make a pre-planning enquiry application. **Therefore, the LLFA consider this objection point remains unresolved.**

2. As per point 4 of condition 2, It is noted that the surface water drainage calculations have been provided, but the applicant need to update and resubmit the calculations using the latest FEH rainfall modelling approach, accounting for up-to-date climate change allowance and should include a plan showing pipework model numbering and network details.

There also needs to be a clear representation of the exceedance routes with the key/legend on the drainage plan within Appendix D. **Therefore, the LLFA consider this objection point remains unresolved.**

Informative

Pre-occupation we would encourage an updated SuDS maintenance plan, supported by a full set of as-built drawings, a postconstruction location plan of the SuDS components cross-referenced with a maintenance diagram.

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.

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 \(hydrosolutions.co.uk\)](#)). 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.

Yours sincerely

Tanvisha Bakhale
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;

- Report – Surface Water Strategy Report, (Rep No: H15993), (Rev: C), prepared by Marks Heeley Ltd, dated July 2022.
- Other – Construction Environment Management Plan (CEMP), (Doc No: CEMP/SHELLWELWYNGARDEN2022), prepared by Premier Forecourts and Construction Limited, dated 3 August 2022.