

Director of Environment & Transport:
Mark Kemp



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Lead Local Flood Authority
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Contact Sana Shaikh
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Date 26 April 2022

RE: 6/2021/2260/FULL – Shell Welwyn Garden City, Stanborough Road, Welwyn Garden City, AL8 6XA

Dear Raymond,

Thank you for your consultation on the redevelopment of 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 at Shell Welwyn Garden City, Stanborough Road, Welwyn Garden City.

We have reviewed the following documents submitted in support of the above application:

- Welwyn Garden-12038629-PLG-PSDL-21 Proposed Schematic Drainage Layout
- Welwyn12038629-ASB-PPG21-17 Drainage Drawing

Unfortunately, the information provided to date does not provide a suitable basis for an assessment to be made of the flood risk arising from the proposed development.

Therefore, we object to the grant of planning permission. In order for the Lead Local Flood Authority to advise the relevant Local Planning Authority that the site will not increase flood risk to the site and elsewhere and can provide appropriate sustainable drainage techniques the following information is required as part of the surface water drainage assessment:

1. Drainage strategy including feasible discharge mechanism and provision of greenfield runoff rates.

Overcoming our objection

The drainage strategy is based on discharge into the combined Thames Water sewer. However, no further details have been provided regarding the scheme. As minimum we

require the applicant to provide a suitable discharge location, discharge rate and provision of attenuation storage volume for the 1 in 100 year plus climate change event. We would expect the site to discharge at the lowest practicable rate into the sewer.

The applicant is also proposing to discharge into a combined sewer therefore we would advise the applicant to contact Thames Water to ensure they are satisfied with the proposed scheme. We note that hardstanding area should discharge to foul however where possible clean roof run-off should be discharged to surface water sewer.

We would recommend the LPA seeks clarification from the applicant on the above points prior to approval of planning permission. However, if the LPA is minded to approve this application, we would provide the following conditions:

Condition 1

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 an 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.

For further advice on what we expect to be contained within the FRA to support an outline planning application, please refer to our Developers Guide and Checklist on our surface water drainage webpage.

<http://www.hertfordshire.gov.uk/services/envplan/water/floods/surfacewaterdrainage/>

This link also includes HCC's policies on SuDS in Hertfordshire.

Informative to the LPA

We have provided comments from the Lead Local Flood Authority in this letter. However, due to the LLFA SuDS team staff shortages, we may not be able to provide further advice at this site.

Please note if the LPA decide to grant planning permission, we wish to be notified for our records should there be any subsequent surface water flooding that we may be required to investigate as a result of the new development.

Yours sincerely,

Sana Shaikh
Sustainable Drainage Systems Officer
Environment & Transport