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

Contact Tanvisha Bakhale  
Email [FRMConsultations@hertfordshire.gov.uk](mailto:FRMConsultations@hertfordshire.gov.uk)

Date 17 May 2023

Dear Raymond

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

Thank you for your re-consultation on the above site, received on 12 April 2023. We have reviewed the application as submitted and wish to make the following comments.

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 subject to conditions on 14 June 2022.

The applicant has submitted the above application as re-consultation for discharging Condition 2. The information previously submitted for Conditions 1 and Condition 17 is satisfactory and we previously recommended the discharge of Condition 1 and Condition 17 in our response dated 27 March 2023.

The LLFA have reviewed the documents submitted in relation to Condition 2 (see Annex). 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 surface water drainage scheme, **we are not able to recommend the discharge of conditions 2** of the approved full planning application (planning reference: 6/2021/2260/FULL).

For reference, 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.'*

The following issues need to be adequately addressed in order for us to be able to recommend the discharge of Condition 2:

1. For Point 1 of Condition 2, in order to demonstrate that there is a viable surface water drainage system, the applicant is required to demonstrate the suitable application of the SuDS discharge hierarchy including appropriate supporting evidence. **Further information required.**
2. As per Point 4 of Condition 2, provision of detailed engineered drawings including cross and long section drawings of each of the proposed SuDS (permeable paving, swales, pond) and drainage features is required. **Further information required.**

## Informative

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](mailto: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: D), prepared by Marks Heeley Ltd, dated July 2022.
- Other – Pre-Planning Enquiry, (Doc No: DS6104166, DTS-74779), prepared by Thames Water, dated 13 April 2023.