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Date 2 December 2022

Dear David

**RE: 6/2022/2300/COND – Former Volkswagen Van Centre, Comet Way, Hatfield, AL10 9TF**

Thank you for your consultation in relation to the above planning application for the submission of details pursuant to condition numbers - 1 (Construction Management Plan), 5 (Surface Water Strategy), 6 (Surface Water Scheme), 7 (Drainage), 8 (Foundation), 9 (Design Plan), 10 (Accessible Housing Scheme), 11 (Highway Improvement), 12 (Samples), 13 (Hard Landscaping), 14 (Soft Landscaping), 15 (Hard landscaping - roof garden), 16 (external lighting), 17 (Cycle Store), 18 (Cycle Store under-croft/Open air), 19 (Balcony Screens), 20 (Energy & Sustainability Statement), 21 (PV Cells Plan), 22 (Bat & Bird Boxes), 23 (Noise Compliance), 24 (Noise Compliance), 26 - (SuDS), 27 (Access), 28 (EV Charging Points), 29 (Parking), 30 (Bin Stores), 31 (Roof Gardens), on planning permission 6/2020/3222/MAJ

The LLFA will only comment on Condition numbers 5, 6, 7 and 26 as below:

*5. The development permitted by this planning permission shall be carried out in accordance with the approved Proposed Surface Water Drainage Strategy prepared by Stantec, drawing number 47179/4001/002 Revision B dated 20 July 2021, the letter provided by Stantec dated 20 July 2021, and the following mitigation measures detailed within the submitted Flood Risk Assessment:*

- a) *Limiting the surface water run-off generated by the critical storm events so that it will not exceed the surface water run-off rate of 2 l/s during the 1 in 100 year event plus 40% climate change event.*
- b) *Providing storage to ensure no increase in surface water run-off volumes for all rainfall events up to and including the 1 in 100 year + climate change event*
- c) *providing a minimum of 210 m3 (or such storage volume agreed with the LLFA) of total storage volume in permeable paving subbase and attenuation tank.*
- d) *Discharge of surface water from the private drain to the Thames Water sewer on Goldsmith Way.*

*The mitigation measures shall be fully implemented prior to first occupation and subsequently in accordance with the timing / phasing arrangements embodied within the scheme, or within any other period as may subsequently be agreed, in writing, by the local planning authority.*

*REASON: To reduce the risk of flooding in accordance with Policy SADM 14 of the Welwyn Hatfield Borough Council Draft Local Plan Proposed Submission August 2016, and the National Planning Policy Framework.*

*6. Development must not commence (excluding works of demolition) until a detailed surface water drainage scheme for the site based on the approved drainage strategy and sustainable drainage principles, has been submitted to and approved in writing by the local planning authority. The drainage strategy should demonstrate the surface water run-off generated up to and including 1 in 100 year + climate change critical storm will not exceed the run-off from the undeveloped site following the corresponding rainfall event, and include details of the following:*

- a) Detailed engineered drawings of the proposed SuDS features including cross section drawings, their size, volume, depth and any inlet and outlet features including any connecting pipe runs, for the entire site within the red line boundary including all footpaths and accesses.*
- b) Final detailed post-development network calculations for all storm events up to and including the 1 in 100 year + 40% climate change storm with half drain down times.*
- c) Exceedance flow routes for storm events greater than the 1 in 100 year + 40% climate change storm.*

*The scheme shall subsequently be implemented in accordance with the approved details before the development is completed.*

*REASON: To prevent the increased risk of flooding, both on and off site, in accordance with Policy SADM 14 of the Welwyn Hatfield Borough Council Draft Local Plan Proposed Submission August 2016, and the National Planning Policy Framework.*

*7. Drainage systems for the infiltration of surface water to the ground must not be carried out other than with the written consent of the local planning authority.*

*REASON: To ensure that the development will not exacerbate the bromate and bromide groundwater pollution beneath the site, in accordance with Policies R2 and R7 of the Welwyn Hatfield District Plan 2005, Policies SP 10 and SADM 18 of the Welwyn Hatfield Borough Council Draft Local Plan Proposed Submission August 2016, and the National Planning Policy Framework.*

*26. Prior to first occupation of the development, a management and maintenance plan for the SuDS features and drainage network must be submitted to and approved in writing by the Local Planning Authority. The scheme shall include:*

- a) Provision of complete set of as built drawings for site drainage;*
- b) Maintenance and operational activities; and*
- c) Arrangements for adoption and any other measures to secure the operations of the scheme throughout its lifetime.*

*REASON: To prevent the increased risk of flooding, both on and off site in accordance with Policy SADM 14 of the Welwyn Hatfield Borough Council Draft Local Plan Proposed Submission August 2016, and the National Planning Policy Framework.*

The following documents/drawings have been reviewed:

20220930-RDB-Condition 05 Compliance-A  
20220930-RDB-Condition 05 Compliance-B  
20220930-RDB-Condition 06 Compliance-A  
20220930-RDB-Condition 06 Compliance-B  
20220930-RDB-Condition 07 Compliance-A  
20220930-RDB-Condition 07 Compliance-B  
20220930-RDB-Condition 26 Compliance-A  
20220930-RDB-Condition 26 Compliance-B  
EA Response - 135016 (002) Redacted  
Affinity Water dated November 2022

**Recommendation:**

No objection to discharge of Condition 5.  
No objection to discharge of Condition 6.  
No objection to discharge of Condition 7.

Holding Objection to discharge of Condition 26.

**Key Issues:**

The LPA should ensure they are prepared to accept an increase in discharge rate from the originally stated 2l/s to 2.8l/s. The LPA may wish to require justification for this increase rate from the applicant.

Condition 26 should not be discharged at this stage as information pertaining to point a) specifically, are yet to be submitted; a) Provision of complete set of as built drawings for site drainage.

**Detailed Comments:**

Construction to be undertaken as per the detail provided in the above-mentioned documents and drawings.

**Informative to the LPA**

The LPA should note that Condition 5 stipulates a discharge rate of 2l/s. The Condition 5 Compliance Report A, Jasper Kerr, September 2022 provides a discharge rate of 2.8l/s. The LPA should assure themselves that this deviation from the original discharge rate provided will not have a detrimental impact on the functionality of the drainage system for the site. Justification from the applicant may be required.

The LPA will need to satisfy itself that the proposed underground surface water attenuation features can be maintained for its lifetime and we recommend the LPA obtains a maintenance and adoption plan from the applicant prior to first occupation.

The LPA should reconsult the LLFA on receipt of as built drawings as required under Condition 26.

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

Yours sincerely

Adam Littler  
SuDS Officer