

Chris Carter Assistant Director (Planning)

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13 December 2022

Hannah Philp Sterling Court Norton Road Stevenage SG1 2JY

TOWN AND COUNTRY PLANNING ACT 1990 TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE) (ENGLAND) ORDER 2015

Dear Ms Philp,

Application Reference: 6/2022/2459/COND

Proposed development at: Hertfordshire Constabulary Stanborough Road Welwyn

Garden City Hertfordshire AL8 6XF

Proposal: Submission of details pursuant to condition 5 (Surface Water Drainage

Scheme - Partial, Phases 2 + 3) on planning permission 6/2021/2125/MAJ

Thank you for your application requesting approval of the above details reserved by condition.

Condition 5 states:

No development of any phase of the development hereby approved shall take place until a detailed surface water drainage scheme for that phase based upon the site-based principles set out in the approved Drainage Strategy produced by Aecom, Project No 60600329 Ref HCHQ-ACM-XX-XX-RP-CE-000002, dated 15 June 2021, has been submitted to and approved in writing by the Local Planning Authority. The scheme shall subsequently be implemented in accordance with the approved details.

The scheme shall include:

- 1. Final infiltration testing to be conducted to BRE Digest 365 Standards at the exact location and depth of the proposed infiltration features.
- 2. A final detailed drainage plan including the location and provided volumes of all SuDS features, pipe runs, invert levels and discharge points. It should be highlighted where the restriction devices to limit the surface water discharge are to be located. If there are any areas to be designated for informal flooding these should be shown on



a detailed site plan.

- 3. Based on the obtained infiltration testing results, final, detailed post development calculations/modelling in relation to surface water for all rainfall events up to and including the 1 in 100-year return period including a + 40% allowance for climate change. Half drain down times of all SuDS structures have to be clarified and should be obtained at below 24 hours.
- 4. Full assessment of proposed SuDS treatment and management stages for all surface water runoff from the proposed development including the haul road.
- 5. 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.
- 6. Clarification around lifetime of the proposed construction haul road whether it is a temporary feature to be used during construction or a permanent feature.

The road will need to be positively drained during its lifetime.

Reason

To prevent the increased risk of flooding, both on and off site in accordance with the National Planning Policy Framework and Policy R7 of the District Plan 2005.

The following information has been provided:

Detailed Surface Water Drainage Scheme for Phases 2 + 3 - HCHQ-ACM-00-XX-RP-CE-00004_Rev0.1 Part A and HCHQ-ACM-00-XX-RP-CE-00004_Rev0.1 Part B received 25/10/2022.

Hertfordshire County Council's Lead Local Flood Authority have been consulted and have provided the below specialist advice to the Local Planning Authority (LPA).

Based on the information provided by the applicant we are not able to advise the local planning authority that condition 5 can be discharged as information is still required to address points 1-6. We have assessed the previously approved drainage layout with infiltration locations and compared this with the proposed drainage strategy drawing submitted with this application and we note that the scheme has been amended to no longer utilise infiltration due to the failure of the BRE 365 testing. We also note that since the submission of the original planning condition, the Decant Building has been moved to a later phase. As the Local Planning Authority, we will need to ensure that drainage information for the Decant Building to discharge Condition 5 will be provided through a separate submission.

1. As part of the condition, point 1 requires detailed infiltration testing at the locations of the infiltration features such as the proposed soakaways and permeable paving areas. It is understood that the preferred strategy to discharge via infiltration has not

been taken forward. Infiltration testing to BRE Digest 365 standards was undertaken between 24 April and 5 May 2021 at three separate locations which failed the requirements of a valid infiltration test under BRE Digest 365. The strategy now proposes that the areas previously proposed to drain via infiltration will now be designed to drain via gravity to an existing surface water drain within the Herts Police Headquarters site. These features will continue to offer treatment and attenuation to runoff. No further information required.

- 2. Point 2 requires a detailed drainage plan. Appendix B drawings, HCHQ-ACM-HQ-XX-DR-CE-01000, HCHQ-ACM-HQ-XX-DR-CE-01001 and HCHQ-ACM-HQ-XX-DR-CE-01002 highlight the modifications to discharge to an existing surface water drain. It is noted for HQ building that additional attenuation for external pedestrian areas, sections of proposed site access road will be provided through rain gardens situated around the HQ building. The rain gardens will provide treatment to runoff and will provide biodiversity and amenity benefits. All runoff generated from the HQ Building will managed below ground for up to the 1 in 100 year plus 40% climate change event. All runoff generated from the car park will managed below ground for up to the 1 in 100 year plus 40% climate change event. No further information required.
- 3. Point 3 requires final detailed post development calculations/modelling for all rainfall events including half drain down times. Attenuation for the HQ Building will be provided by rain gardens surrounding the building. It is noted as the proposed rain gardens surrounding the HQ could not satisfy the entire storage requirements of the HQ Building, the remaining storage requirement is to be provided through enlarging the existing attenuation pond. To represent a conservative approach, it was assumed that the existing attenuation pond has no available storage to accommodate runoff from the HQ building.

The previously agreed discharge rate for the site was 3.41l/s for the HQ building. However, as infiltration is not viable, the rate has been reduced to 2.51 l/s to share the discharge rate among other areas of the site. Within the HCHQ Phase 1 Discharge of Condition 5 Technical Note (HCHQ-ACM-00-XX-RP-CE-00003), it was demonstrated that the enlarged attenuation pond could still safely accommodate runoff contributions from existing areas, restricted discharge from the Dog Unit and the HQ building network. We understand it is proposed enlarge the existing attenuation pond by 720 m3 to a total volume of 2070 m3, changing the discharge rate from the attenuation pond from 22.7l/s to 26.2l/s to allow for the maximum allowable runoff rates from the HQ building and Dog unit. The calculations provided with the enlarged attenuation pond show the ponds half drain down time of 537 minutes and the rain gardens between 4 and 39 minutes which is acceptable. We require confirmation from Thames Water that this increased discharge rate is acceptable.

We note that the discharge rate of 2.51l/s was proposed to be allocated to the HQ building and 0.9l/s to the Western Car Park however, modelling determined that the required permeable paving volume could not half drain within 24 hours. Therefore, the discharge rate for the car park has been increased until a half drain down time of less than 24 hours was achieved. This has led to an increased discharge rate of

4.1l/s for the car park. We require confirmation from Thames Water that this increased discharge rate is acceptable.

We recommend that modelling is recalculated using FEH2013 rather than FSR/FEH 1999 to ensure that the water will remain in the system and the above assumptions on the required storage volumes is correct.

- 4. We note that runoff will drain through rain gardens before entering the pipe network which discharges into the enlarged attenuation basin that includes sediment forebays. From the Simple Index Assessment sufficient treatment to mitigate the associated pollution hazards for all areas has been provided. No further information is required.
- 5. Detailed engineering drawings of the proposed SuDS features and other drainage elements for the Phase 2 and 3 drainage are presented in Appendix D. However, detailed drawings of the enlargement of the attenuations tank have not been provided. We await submission of this additional information for the attenuation feature proposed.
- 6. The existing gravel road that commences within Gosling Sports Park to the northern boundary of the Hertfordshire Constabulary HQ site will become a Haul Road which will be used as the main access route for Phase 1 construction works. The applicant notes that as there is no proposed surface upgrade or expansion of Haul Road, that it will drain as it currently stands, deeming that positive drainage is not required. However, we require the road to be positively drained.

It is noted that for Phases 2 and 3 of the redevelopments that the increased frequency of vehicles using Haul Road may lead to the surface of Haul Road potentially requiring improvements. We note that surveys of Haul Road have been commissioned by Hertfordshire Constabulary however, we require the conclusions from the survey to determine if Phases 2 and 3 will change the drainage strategy for Haul Road. We await further information.

Informative to the LPA

For further advice on what we expect to be contained within the drainage strategy to support a discharge of condition 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.

Having regard to the above, insufficient information has been submitted to discharge condition 5 and the condition is refused.

The Case Officer notes that a separate application maybe required and discharged by the Local Planning Authority to take into account further investigation to the proposed haul road as detailed as part of this condition submission.

The Case Officer also notes that under other condition submissions for this project, it states that there will be material improvements to the haul road. Therefore, this should be reflected under this condition submission.

Should you require any clarification regarding the contents of this letter, please do not hesitate in contacting me at I.sahlke@welhat.gov.uk and I will be pleased to advise you further.

Yours sincerely,

LAS.

Ms Louise Sahlke

Senior Development Management Officer