

Director of Environment & Infrastructure:
Mark Kemp



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Welwyn Garden City
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AL8 6AE

Lead Local Flood Authority
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Hertfordshire County Council
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HERTFORD SG13 8DN

Contact David Uncle
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Date 19 October 2021

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, AL8 6XA.

We have reviewed the list of supporting documents and note that a surface water drainage strategy has not been included. In the absence of a surface water drainage strategy, the flood risks resulting from the proposed development are unknown. Therefore, we object to this application and recommend refusal of planning permission until a satisfactory surface water drainage strategy has been submitted.

Details for the management of surface water drainage is required under the NPPF for all Major Planning Applications as amended within the NPPG from the 6 April 2015. The applicant should therefore provide a surface water drainage strategy that includes the following:

1. A statement of compliance with the NPPF and NPPG policies, LPA local plan policies and HCC SuDS Guidance and Policies.
2. Anecdotal information on existing flood risk with reference to most up to date data and information.
3. Location and extent of any existing and potential flood risk from all sources including existing overland flow routes, groundwater, flooding from ordinary watercourses referring to the national EA fluvial (River) and surface water flood maps.
4. Evidence of ground conditions/ underlying geology, permeability including BRE Digest infiltration tests and topographical survey to metres AOD.
5. Detailed calculations of existing surface water storage volumes and flows.

6. Detailed post development calculations/ modelling in relation to surface water are to be carried out for all rainfall events up to and including the 1 in 100 year including a +40% allowance for climate change (for brownfield sites we require pre- and post-development run-off rates and volumes).
7. Full detailed drainage plan including location of SuDS measures, pipe runs and discharge points, informal flooding (no flooding to occur below and including the 1 in 30 Year rainfall return period). All drawings to be 'final' not 'preliminary' or 'draft'.
8. Provision of robust SuDS management and treatment.
9. Detailed modelled outputs of flood extents and flow paths for a range of return periods up to the 1 in 100 year + climate change event and exceedance flow paths for surface water for events greater than the 1 in 100 year + climate change.
10. Full details of any required mitigation/management measures of any identified source of flooding.
11. Evidence that if the applicant is proposing to discharge to the local sewer network, they have confirmation from the relevant water company that they have the capacity to take the proposed volumes and run-off rates.
12. Justification of SuDS selection.
13. Details of required maintenance of any SuDS features and structures and who will be adopting these features to the lifetime of the development.

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.

Informative to the LPA

We ask to be re-consulted with any additional information the applicant may submit. We will provide you with bespoke comments within 21 days of receiving a formal re-consultation. Our objection will be maintained until an adequate surface water drainage assessment has been submitted.

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

Yours sincerely,

David Uncle
SuDS Officer
Environment and Infrastructure