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Date 19 October 2021

RE: 6/2021/0181/MAJ – Former Shredded Wheat Factory Broadwater Road Welwyn Garden City AL7 1RR

Dear Clare,

Thank you for your consultation in relation to the above planning application for the Hybrid planning application comprising: Detailed Planning Application for 399 Private Rented Sector (PRS) dwellings and 153 dwellings (Class C3), 250 units of residential care accommodation for the elderly (Use Class C2) with associated communal facilities, 15,247m² of community and commercial hub (Use Classes E and F1) with associated cycling hub, car parking, access, landscaping, public art and other supporting infrastructure; and Outline Planning Application for up to 418 dwellings (Class C3) with all matters reserved except access at Former Shredded Wheat Factory, Welwyn Garden City, AL8 6UN.

We understand this hybrid application seeks full and outline planning permissions for a major development, and we have assessed the following documents:

- Flood Risk Assessment produced by RMA Environmental Limited, report number RMA-RC2083, revision 3, dated 22nd November 2020;
- Environmental Statement: Volume 1, Main Text produced by Entran Limited, revision 2.0, dated 10 June 2021;
- All supporting information.

The information provided to date still does not provide a suitable basis for an assessment to be made of the flood risks arising from the proposed development. As such, we maintain our previous comments.

We therefore object to the grant of planning permission and recommend refusal on this basis for the following reasons.

Details of how surface water arising from a development is to be managed is required under the NPPF for all Major Planning Applications as amended within the NPPG from

the 6 April 2015. Therefore, for the LLFA to be able to advise the Local Planning Authority that there is no flood risk from surface water, an application should include the following.

1. Full, detailed drainage strategy for the full planning application part including all required third party agreements.
2. Clarification of the proposed drainage strategy within the outline planning application part including all necessary agreements.

Overcoming our objection

1. We acknowledge the applicant has provided a Flood Risk Assessment produced by RMA Environmental Limited. However, no appropriate drainage strategy has been submitted.

The applicant assumes peak discharge from the site at 139.4 l/s into a public surface water sewer. This is not acceptable in principle at this stage. We would like to remind the applicant that the South Site drainage strategy assumes complex flow controls and discharge at greenfield runoff rates for the appropriate rainfall events. This provides the maximum discharge rate from the entire South Site at around 15 l/s for the 1 in 100 year event including 40% allowance for climate change. Therefore, we would advise that the North Site drainage strategy needs to follow the same design principles in terms of discharge rates.

In addition, we would like to highlight that at the South Site there is an ongoing consultation for a hybrid application, with a submitted drainage strategy. We would strongly advise the applicant to follow the same design level principle for the North Site in terms of a drainage strategy for the proposed development.

The updated drainage strategy should follow the above. It should be supported by a detailed network modelling, detailed drainage layout and any additional information to support the design. For further advice on what we expect to be contained within the FRA to support a full 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/>

Moreover, the drainage strategy should include clear explanation on how any access and internal roads located within the development's red line boundary will be drained. An appropriate treatment train will have to be assessed and delivered prior to any discharge from the site.

As the applicant intends to discharge surface water runoff from the proposed development site into an existing Thames Water surface water sewer, an appropriate agreement for the proposed connection points, discharge rates and volumes needs to be provided. As this is for a full planning application, we require that this confirmation should be provided prior to the approval of planning permission to ensure that the proposed scheme is feasible. Therefore, we would advise the applicant to apply for a pre-development enquiry to Thames Water for the latest proposal.

2. Based on the assessment of a masterplan and additional drawings, we acknowledge within the outline planning application area the applicant intends to provide an attenuation basin. However, no further information has been provided on that structure or any drainage on the site.

Therefore, the applicant should clarify how the proposed site will be drained and clearly explain how it will fit within the wider drainage strategy for the wider development site. Any supporting information like modelling or layout plan may be required.

All necessary third party agreements should be provided in support. This should include Thames Water agreements for any proposed discharge point from the site.

In addition, the proposed attenuation basin lies very close to the boundary with the railway site. We have notice there is Network Rail Consultation Response submitted on the planning portal, which states:

“For enquiries, advice and agreements relating to construction methodology, works in proximity to the railway boundary, drainage works, or schemes in proximity to railway tunnels (including tunnel shafts) please email assetprotectioneastern@networkrail.co.uk.”

Therefore, the applicant needs to provide Network Rail’s agreement in principle for the proposed attenuation basin location.

As the above may impact on the overall layout and masterplan of the proposed development, we require that this agreement should be secured, and evidence should be provided prior to the approval of planning permission to ensure that the proposed scheme is feasible.

Informative to the LPA

We would advise the LPA an appropriate drainage strategy has still not been provided, and we maintain the concerns above.

We recommend the LPA to obtain all information as requested above to ensure the feasibility of the proposed scheme.

Moreover, we have noticed that major highway improvement works are being proposed outside of the red line boundary. It is up to the LPA to secure that the proposed roads or areas of highway improvements will be appropriately drained. Any potential risk of contamination arising from any surface water runoff from the highway needs to be managed in an appropriate manner.

As the LLFA, we would like to highlight to the LPA that the applicant for the North Site needs to follow the same surface water drainage design principles and provide the same level of information and design as it is submitted for the South Site.

The applicant can overcome our objection by submitting information which covers the deficiencies highlighted above and demonstrates that the development will not increase

risk elsewhere and where possible reduces flood risk overall and gives priority to the use of sustainable drainage methods.

If this cannot be achieved, we are likely to maintain our objection to the application.

We ask to be re-consulted when the amended surface drainage assessment will be submitted. We will provide you with bespoke comments within 21 days of receiving formal reconsultation. Our objection will be maintained until an adequate surface water management scheme has been submitted.

Yours sincerely,

David Uncle
SuDS Officer
Environment and Infrastructure