

Mr Nabeel Kasmani  
Local Planning Authority  
Welwyn Hatfield Borough Council  
The Campus  
Welwyn Garden City  
Hertfordshire  
AL8 6AE

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

Contact Jessica Christie  
Email [FRMConsultations@hertfordshire.gov.uk](mailto:FRMConsultations@hertfordshire.gov.uk)

Date 23 February 2023

Dear Nabeel

**RE: 6/2022/2801/MAJ Campus East Car park College Way, Welwyn Garden City, AL8 6DG**

Thank you for your consultation on the above site, received on 3 January 2023, for the major full planning permission for the demolition of all existing buildings and structures followed by the erection of five buildings to provide 313 residential units (Use Class C3); car and cycle parking, cycle and refuse storage, hard and soft landscaping, external lighting, drainage, infrastructure, and associated works. We have reviewed the application as submitted and wish to make the following comments.

The following information has been highlighted in the FRA. The current site sits in flood zone 1 for fluvial flooding. There are, however, 3 surface water overland flow pathways within and along the site boundary. All 3 surface water flow paths are categorised between 'low' and 'high' risk, meaning this area has a chance of flooding >3.3% Annual Exceedance Probability (AEP) and <0.1% AEP. One surface water flow path flows from North to South mid-way along the Western boundary of the development towards Bridge Road. Another surface water flow path flows West to East at the top of the site boundary. The final surface water flow path is located south-east along college way adjacent to the western boundary of the site. Overall, concerns arise over an increased flood risk towards Bridge road, south of the development and to the proposed development itself.

We **object** to this planning application in the absence of an acceptable Flood Risk Assessment (FRA) as.

- The existing surface water flow paths passing through the proposed development could result in an increase of flood risk to the development and elsewhere. The current proposed development does not comply with NPPF, PPG or local policies including.
- HCC policy 8 (consenting near watercourse)
- HCC policy 14 (Runoff rates for brownfield site)

- HCC policy 18 (Design surface SuDS)
- Policy SADM 14 Flood Risk and Surface Water Management

### **Reason**

To prevent flooding in accordance with National Planning Policy Framework paragraph 167, 169 and 174 by ensuring the satisfactory management of local flood risk, surface water flow paths, storage and disposal of surface water from the site in a range of rainfall events and ensuring the SuDS proposed operates as designed for the lifetime of the development.

### **We will consider reviewing this objection if the following issues are adequately addressed:**

1. Provision of a detailed flood risk assessment to show how the surface water flood risk will be managed through the site, without adversely affecting existing risk elsewhere and not creating a risk of flooding to the proposed development. We require pre and post development flood modelling of the surface water flood risk which may include an assessment of the identified watercourse to the north of the site. It is unclear if the surface water flow paths originate from a low-capacity culvert on the watercourse. We expect mitigation proposals to be included.
2. Provision of a detailed flood risk assessment to show how the surface water flood risk will be managed through the site, without adversely affecting existing risk elsewhere and not creating a risk of flooding to the proposed development. We require pre and post development flood modelling of the surface water flood risk which may include an assessment of the identified watercourse to the north of the site. It is unclear if the surface water flow paths originate from a low-capacity culvert on the watercourse. We expect mitigation proposals to be included.
3. The site is indicated as being at medium to high risk of surface water flooding (as indicated by the Environment Agency Surface Water Flood Risk Map) and the submitted Flood Risk Assessment (FRA). An ordinary watercourse is present on the northern boundary of the site. A surface water flow path passes through the site, flowing south towards bridge road (South of the site). The surface water flow path will impact blocks B3, A2 and A3.
4. There are two other flow paths which run along the western and southern boundary of the site. In section 4 of the FRA, all three surface water flow paths are highlighted. However, there is insufficient information demonstrating how the surface water flow paths are being managed and the associated risk mitigated. Whilst this is a re-development, we require evidence as to how the flood risk originating offsite will be managed to ensure there is no adverse risk elsewhere or to the proposed development. We require evidence to show whether the applicant will keep the surface water flow path separate to the drainage network, and how the separation will be maintained so the drainage network will operate as designed. Or, whether the applicant will account for the surface water flow paths in the drainage strategy and associated drainage design calculations, including additional attenuation to account for excess water.

5. We require the proposed development to have safe access and egress for vehicles and pedestrians during a flood. The preparation and submission of an agreed emergency flood plan that includes adequate flood warning and emergency management arrangements to ensure that safe access is maintained for emergency services.
6. In section 6.13 of the Flood risk assessment, it states the following 'it is proposed to divert the 225mm-300mm diameter public surface water sewer to the carriageway of the proposed highways of the site, between manholes 0402 and 9207. This will be subject to section 185 agreement with Thames Water which can be addresses at the detailed design stage'. We appreciate that a section 185 agreement is being agreed. However, at this stage of planning detailed design is required. Please provide a note of acceptance in principal agreement showing the changes and detail of the diverted public surface water sewer.
7. The LLFA require the discharge rate to match the 1 in 1-year greenfield runoff rate if possible. Therefore, we request justification as to why it will be restricted to 8.2 l/s (3.3% AEP event) and not 1 in 1 year runoff rate of 3.6 l/s. The FRA states controlling the discharge rate to the 1 in 1 year runoff rate is not possible, however it does not provide justification or evidence to support this statement. The applicant must provide update their proposed design and providing supporting evidence and information. In addition, the applicant has not provided a breakdown of the discharge rates to each of the four connection locations. The LLFA requires this breakdown as the text in the FRA for the flow rates to each of the connections is contradictory.
8. We require evidence of an agreement in principle between the applicant and the water company to connect to their sewer network and discharge at an agreed rate. An agreement in principle is required to demonstrate the proposed discharge location and rate is viable without increasing flood risk elsewhere in the network.
9. The LLFA require the applicant ensures that flood resistance and resilience measures are included in the proposed design to account for surface water flow paths and flood risk. A minimum of 300mm must be provided between the design flood event from all sources of flooding (both overland flow paths and from any risk of flooding from the drainage scheme) and the finished floor level. A minimum of 150mm is recommended above external ground levels that are sloping away from vulnerable areas such as doorways.
10. Provide an exceedance flow plan (including direction, depth, and velocity) needs to be provided that identifies exceedance flow routes that minimise the risk to people and property during rainfall events greater than the 1% AEP plus 40% for climate change event. This will include surface water which may enter the site from elsewhere.
11. Provide detailed drawings of all SuDS features including cross sectional drawings of all SuDS features, ensuring volume, depth, discharge, and size is accounted for.
12. Review and update all labels of detailed design, ensuring cross referencing between detailed design and Microdrainage are consistent. There are several discrepancies between discharge rates and storage volumes.

13. Provide a plan of the proposed detailed design labelling permeable and impermeable areas.

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.

Erection of flow control structures or any culverting of an ordinary watercourse requires consent from the appropriate authority, which in this instance Hertfordshire Lead Local Flood Authority Level Internal Drainage Board. It is advised to discuss proposals for any works at an early stage of proposals.

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 \(hydrosolutions.co.uk\)](https://www.hydrosolutions.co.uk/FEH22-User-Guide)). 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 the 1<sup>st</sup> 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

Jess

Jessica Christie  
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.

- Site location plan, prepared by Saunders, September 2022, Ref: 8375/P100
- Flood Risk Assessment and drainage Strategy, Prepared by Ardent, October 2022, Ref: 2007511-07A, Final A
- Construction Environmental management plan, prepared by Bellway, 21 October 2022