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Contact Chris Bowyer
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Date 15 June 2023

Dear Mr Myers

RE: 6/2023/0013/COND – YMCA, 90 Peartree Lane, Welwyn Garden City, AL7 3UL

Thank you for your reconsultation on the above site on 31 May 2023. We have reviewed the application as submitted and wish to make the following comments.

The Discharge of Conditions application relates to Condition 5 (Drainage Scheme), 29 (Drainage Strategy), and 33 (Final Design of Drainage Scheme) of the Outline Application (6/2019/2714/OUTLINE) that was submitted on the 28 October 2019.

The previous application was for a hybrid application for the demolition of the existing hostel, development of a four-story 100 bed YMCA Hostel (All details submitted for determination), and up to 43 residential apartments (All details retained for future determination as reserved matters, except means of access) with associated car parking and landscaping.

The LLFA has reviewed the additional information that has been submitted in support of this planning application in the letter dated the 13 March 2023 from Scott White and Hookins. While this information has enabled the LLFA to progress with this application, there is still information and clarification required from the applicant. At present, the LLFA **maintains our objection** to the approval of the discharge of Conditions 5, 29, and 33 as part of the application 6/2023/0013/COND.

“Condition 5 is worded as follows

No development other than demolition, site clearance, or remediation works in respect of land contamination shall take place until the final design of the drainage scheme is completed and sent to the Local Planning Authority for approval. The surface water drainage system will be based on the submitted Drainage Strategy Report produced by Pinnacle Consulting Engineers, project number C190906, version 3.3, dated 03 December 2020, and Flood Risk Assessment produced by Pinnacle Consulting

Engineers, project number C190906, version 2.0, dated 3 June 2020. The scheme shall also include:

1. Detailed infiltration testing in accordance with BRE Digest 365 at the proposed depth and location of the proposed SuDS feature.
2. Provision of additional ground investigations to assess the potential for solution features.
3. Groundwater monitoring is to be carried out following any ground remediation works to determine the level of groundwater. If the site is found to be impacted by groundwater, an assessment of this flood risk and its mitigation should be provided. Details on how the site drainage features will be secured against groundwater should also be provided.
4. A minimum of 1m buffer zone needs to be provided between the bottom of any infiltration feature and the existing groundwater levels on the proposed development site.
5. Detailed engineering drawings of the proposed SuDS features including their location, size, volume, depth, and any inlet and outlet features including any connecting pipe runs and all corresponding calculations/modelling to ensure the scheme caters for all rainfall events up to and including the 1 in 100 years + 40% allowance for climate change event, with a supporting contributing area plan.
6. Demonstrate appropriate SuDS management and treatment for the entire site including the access road. To include exploration of source control measures and include above-ground features such as permeable paving.
7. Provision of half drain down times within 24 hours.
8. Exceedance plan for events greater than the 1 in 100 years plus 40% for climate change events.

REASON: To protect the surrounding environment from flooding in accordance with Policies R7 of the Welwyn Hatfield District Plan 2005 and the National Planning Policy Framework 2019.”

“Condition 29 is worded as follows

The development permitted by this planning permission shall be carried out in accordance with the Drainage Strategy Report produced by Pinnacle Consulting Engineers, project number C190906, version 3.3, dated 03 December 2020, and Flood Risk Assessment produced by Pinnacle Consulting Engineers, project number C190906, version 2.0, dated 3 June 2020 and the following mitigation measures:

1. Provision of drainage strategy based on infiltration (for catchments A and C) and discharge into Thames sewer (Catchment B)
2. Limiting the surface water run-off rates to a maximum of 5l/s for all rainfall events up to and including the 1 in 100 years + climate change event with discharge into the Thames surface water sewer.
3. Provide attenuation to ensure no increase in surface water run-off volumes for all rainfall events up to and including the 1 in 100 years + climate change event.

4. *Implement drainage strategy utilising lined permeable paving with sub-base and attenuation tanks.*
5. *Provision of a filter drain to manage existing surface water flood risk.*

REASON: To protect the surrounding environment from flooding in accordance with Policies R7 of the Welwyn Hatfield District Plan 2005 and the National Planning Policy Framework 2019.”

“Condition 33 is worded as follows

No development other than demolition, site clearance, or remediation works in respect of land contamination shall take place until the final design of the drainage scheme is completed and sent to the Local Planning Authority for approval. The surface water drainage system will be based on the submitted Drainage Strategy Report produced by Pinnacle Consulting Engineers, project number C190906, version 3.3, dated 03 December 2020, and Flood Risk Assessment produced by Pinnacle Consulting Engineers, project number C190906, version 2.0, dated 3 June 2020. The scheme shall also include:

1. *Detailed infiltration testing in accordance with BRE Digest 365 at the proposed depth and location of the proposed SuDS feature.*
2. *Provision of additional ground investigations to assess the potential for solution features.*
3. *Groundwater monitoring is to be carried out following any ground remediation works to determine the level of groundwater. If the site is found to be impacted by groundwater, an assessment of this flood risk and its mitigation should be provided. Details on how the site drainage features will be secured against groundwater should also be provided.*
4. *A minimum of 1m buffer zone needs to be provided between the bottom of any infiltration feature and the existing groundwater levels on the proposed development site.*
5. *Detailed engineering drawings of the proposed SuDS features including their location, size, volume, depth, and any inlet and outlet features including any connecting pipe runs and all corresponding calculations/modelling to ensure the scheme caters for all rainfall events up to and including the 1 in 100 years + 40% allowance for climate change event, with a supporting contributing area plan.*
6. *Demonstrate appropriate SuDS management and treatment for the entire site including the access road. To include exploration of source control measures and include above-ground features such as permeable paving.*
7. *Provision of half drain down times within 24 hours.*
8. *Exceedance plan for events greater than the 1 in 100 years plus 40% for climate change events.*

REASON: To protect the surrounding environment from flooding in accordance with Policies R7 of the Welwyn Hatfield District Plan 2005 and the National Planning Policy Framework 2019.”

As Conditions 5 and 33 are identical, we will respond to these jointly. Condition 29 will be responded to separately.

As outlined in our previous letter, Points 1, 2, 3, 6, and 7 of Conditions 5 and 33 were able to be recommended for discharge by the LLFA. In addition, **Points 4 and 5 can now also be recommended for discharge** by the LLFA based on the information attached to the letter submitted on the 26th of May 2023.

The LLFA is **now able to recommend the discharge of Point 4 of Conditions 5 and 33** as the applicant has satisfied the requirement to ensure that there is a minimum of 1m clearance between the base of any infiltration feature and the existing groundwater levels. The applicant has evidenced a 1.8m clearance between the recorded groundwater and the base of the attenuation tank along with providing further clarification of the cover level and our concerns regarding the floatation of the attenuation tanks.

Furthermore, in relation to Point 5 of Conditions 5 and 33 and based on the information submitted on the 26 May 2023 by the applicant in the AKS Ward and JBA reports the information regarding the anticipated predicted surface water flood volume, the LLFA is now **able to recommend the discharge of Point 5 of Conditions 5 and 33**. However, at this stage, the LLFA still requires further information and clarification on Point 8.

Based on the information provided, the LLFA remains **unable to recommend the discharge of Point 8 of Conditions 5 and 33 and are therefore unable to recommend the discharge of Conditions 5 and 33 of the 6/2019/2714/OUTLINE** planning application for the site at the YMCA Hostel on Peartree Lane at this time. For the LLFA to consider removing their objection, the applicant must provide the relevant information and clarification to address the point.

While the LLFA appreciates the information that has been submitted regarding the exceedance plan for events greater than the 1 in 100 year plus 40% for climate change events, the LLFA is concerned that there will be flooding of between 40cm and 50cm.

The finished floor levels that have been provided by the applicant show the hostel to be at 83.4mAOD. The design flood within the 1 in 100 year plus 40% climate change allowance design event has flood levels of between 83.00mAOD and 83.75mAOD. **This gives an approximate depth of flood water of 40cm above the finished floor level of the Hostel. Therefore, at present the proposed development is likely to flood internally.**

The exceedance plan has shown that their proposed building is at risk of flooding and puts its users at an increased flood risk.

The LLFA notes a site wide exceedance flow route plan has not been provided. The exceedance flow routes for the car park area of the site have been demonstrated on the Finished Levels Layout Drawing (203905-SWH-ZZ-XX-DR-C-5501-P02). The areas immediately surrounding the building have not had exceedance flow routes demonstrated.

This is not acceptable and therefore the LLFA is **unable to discharge Point 8 of Conditions 5 and 33** until the applicant has resolved this matter.

While for Condition 29, the LLFA has previously been able to recommend the discharge of Points 1, 2, and 5. The LLFA is now in a position to recommend the discharge of Point 3 of Condition 29 based on the information submitted as part of the letter dated the 26 May 2023.

The LLFA is satisfied the applicant has fulfilled our requirements to provide further direction as to where information regarding the calculation of the attenuation volumes and runoff rates was located and is, able to recommend the discharge of Point 3 of Condition 29 based on the information submitted within the letter dated 26th May 2023.

The LLFA still requires further information or clarification on Point 4.

The LLFA is pleased to note that alterations to the hydraulic calculations have been implemented to ensure that the latest FEH rainfall method has been utilised, the MADD Factor has been reduced to 0 and the inclusion of the correct climate change allowance on the 1 in 100 year event. However, the LLFA notes that within the hydraulic calculations, there are inconsistencies with the FEH rainfall method used with FEH1999 being used for one of the Synthetic Rainfall Details. The LLFA also notes there is no climate change allowance on the 1 in 30 year calculations along with no 1 in 100 year without any climate change allowance. The applicant is required to submit both the 1 in 30 year and 1 in 100 year events with and without the correct climate change allowances. The LLFA reminds the applicant of the requirement to use the most up to date FEH method within the hydraulic calculations, along with including the correct climate change allowance for the 30 and 100 year return periods. Until these calculations have been undertaken and provided, the LLFA is **unable to recommend the discharge of Point 4 of Condition 29.**

Based on the information provided, the LLFA **is unable to recommend the discharge Condition 29 of the 6/2019/2714/OUTLINE planning application** for the site at the YMCA Hostel on Peartree Lane at this time. For the LLFA to consider removing their objection, the applicant must provide the relevant information and evidence to address the point above.

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.

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 have changed. In some areas, there is a reduction in comparison to FEH2013, and in 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 1 April 2023. This includes those applications that are currently at an 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 is not accepted.

Please note if you, the Local Planning Authority review the application and decide to grant planning permission, you should notify us, the Lead Local Flood Authority, by email at FRMConsultations@hertfordshire.gov.uk.

Yours sincerely

Chris

Chris Bowyer
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;

- Boundary Plan – Planning Application (47-WPA-Z1-SP-DR-A-3003), Will + Partners, 7 December 2022, Revision T4
- YMCA Hostel, Peartree Lane, Welwyn Garden City, Drainage Design Information (Report Reference: 203905-SWH-ZZ-01-S-RP-0001), Scott White and Hookins, 20 December 2022, Revision 01
- Scott White and Hookins Letter to the LPA, 13 March 2023
- Scott White and Hookins Letter to the LPA, 26 May 2023