

Environment Director & Chief Executive:
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Date 13 March 2018

RE: 6/2018/0171/MAJ – Former Shredded Wheat Factory, Welwyn Garden City, AL8 6UN

Dear Chris,

Thank you for your consultation in relation to the above planning application for the creation of a mixed-use quarter comprising the erection of up to 1,340 residential dwellings including 414 (31%) affordable dwellings (Use Class C3); 114 extra care homes (Use Class C2); the erection of a civic building comprising 494 sq.m of health (Use Class D1), 494 sq.m of community use (Use Class D1), 1,232 sq.m of office (Use Class B1) and 646 sq.m of retail (Class A1/A2/A3/A4/A5); alterations, additions and change of use of Grade II Listed Building and retained Silos to provide 5,096 sq.m of flexible business floorspace (Use Class B1), 265 sq.m Combined Heat and Power (Sui Generis), 2,494 sq.m International Art Centre (Use Class D1), 1,226 sq.m Gymnasium (Use Class D2), 1,576 sq.m of restaurant/coffee shop/bar (Use Class A1/A3/A4/A5), Creche/Day Nursery of 644 sq.m as well as a Network Rail TOC Building of 364 sq.m; plus associated car parking, access, landscaping, public art and other supporting infrastructure, at Former Shredded Wheat Factory, Welwyn Garden City, AL8 6UN.

We understand this application seeks full planning permission for a major development, and we have assessed the Environmental Statement: Volume 1, Main Text produced by Entran Limited, revision 1.0, dated 12th February 2018 and the Flood Risk Assessment produced by RMA Environmental Limited, report number RMA-RC 1787, revision 2, dated 30th January 2018, submitted to support to this application. However the information provided to date does not provide a suitable basis for an assessment to be made of the flood risks arising from the proposed development.

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 for full planning permission should include the following:

1. Clarification of the phasing arrangements and the proposed sub-catchment drainage strategy approach for the development site.
2. Detailed calculations of the existing surface water storage volumes and discharge flows for the development site.
3. 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, this must also include a +40% allowance for climate change.
4. A detailed drainage plan including the location of all SuDS features, pipe runs and discharge points. If areas are to be designated for informal flooding these should also be shown on a detailed site plan.
5. Exceedance flow paths for surface water for events greater than the 1 in 100 year + climate change.
6. Details of any required maintenance of any SuDS features and structures and who will be adopting these features for the lifetime of the development. Please note that for residential development the lifetime is 100 years.

Overcoming our objection

1. The site has been divided into separate sub-catchments to deal with surface water.

We have concerns regarding the phasing arrangements of the development and how the drainage for the site will be delivered. The site has been divided into the 6 sub-catchments with the following discharge rates; the sub-catchment 1 with the rate of 20.6 l/s, the sub-catchment 2 with the rate of 31.1 l/s, the sub-catchment 3 with the rate of 36.6 l/s, the sub-catchment 4 with the rate of 36.3 l/s, the sub-catchment 5 with the rate of 150 l/s and the sub-catchment 6 with the rate of 23.8 l/s. The timeframe for the phasing and construction of the drainage system should be clarified to ensure the masterplan infrastructure has been put in place in order to secure the feasible discharge locations for the various catchments as some of the drainage features are located outside each of the catchment boundary. Should different catchments/sites come forward prior to the construction of strategic system an alternative means of discharge will have to be identified.

2. The applicant should provide detailed calculations of the existing surface water storage volumes and discharge flows for the development site.

We note that 50% betterment is being proposed for the run-off rate generated from the development site for the 1 in 1 year rainfall event.

3. We acknowledge the existence of Micro Drainage calculations for the 1 in 100 year event plus climate change allowance.

However, modelling for the 1 in 30 year rainfall event should be included as well. It should be noted that the drainage system should be designed to accommodate all surface water up to and including the 1 in 30 Year rainfall return period. Please note all drawings to be the final design.

4. The applicant should provide a detailed drainage plan. This should include all SuDS features included within the proposed drainage strategy, as well as any pipes, manholes with invert levels and proposed discharging points from the proposed development. We need to ensure that the drainage strategy for the proposed development is feasible.
5. Routes of exceedance will also need to be assessed and identified for rainfall events that exceed the 1 in 100 year plus climate change event.
6. The applicant will need to satisfy the LPA that the proposed drainage scheme can be adopted and maintained for its lifetime by providing a maintenance plan, detailing key operations and management. The maintenance of permeable paving, above ground attenuation and underground attenuation tank structure must be appropriate to prevent the risk of failure or reduction of its capacity. Underground and any mechanical features are likely to carry a higher risk as a result of poor maintenance.

Informative to the LPA

We recommend the LPA to obtain a maintenance plan that explains and follows the manufacturer's recommendations for maintenance or that it follows the guidelines explained by The SuDS Manual by CIRIA. A maintenance plan should also include an inspection timetable with long term action plans to be carried out to ensure efficient operation and prevent failure.

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,

Julia Puton

SuDS Officer

Hertfordshire County Council