

Director of Environment & Infrastructure:
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Date 10 December 2019

RE: 6/2019/2714/OUTLINE – 1 YMCA, 90 Peartree Lane, Welwyn Garden City, AL7 3UL

Dear Clare,

Thank you for your consultation in relation to the above planning application for the outline planning application for a hybrid application for demolition of existing hostel, development of a four storey 100 bed YMCA Hostel (All details submitted for determination) and a 2,3 and 4 storey building providing up to 43 residential apartments (All details retained for future determination as reserved matters, except means of access) with associated car parking and landscaping, at 1 YMCA, 90 Peartree Lane, Welwyn Garden City, AL7 3UL.

We understand this application seeks outline planning permissions for major developments, and we have assessed the following documents submitted to support to this application:

- Drainage Strategy Report produced by Pinnacle Consulting Engineers, project number C190906, version 2.0, dated 9 October 2019.

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, applications for outline planning permissions should include the following:

Outline Planning Applications

1. Full assessment of all existing sources of flooding on the development site.
2. Clarification of the existing ground condition and contamination risk on the site.
3. Clarification on the existing surface water drainage on the site.
4. Details of the proposed drainage for the indicated road and car parking.
5. Clarification of the provided SuDS management stages.
6. Limiting the proposed discharge of surface water runoff from the site to Greenfield runoff rates.
7. 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.
8. Clarification of the provided drainage layout.
9. If the drainage proposals are to infiltrate to ground then evidence of permeability should be provided and test must be conducted in accordance with BRE Digest 365.
10. Evidence that if the applicant is proposing to discharge to the local sewer network that they have confirmation from the relevant water company or sewer network operator that they have the capacity to take the proposed volumes and runoff rates.

Overcoming our objection for the Outline Planning Applications

1. We acknowledge that the applicant has submitted a drainage strategy based on soakaways, discharge into the ground and overflow discharge into the existing public surface water sewer.

We note that flooding from rivers and the Environmental Agency's Flood map has been referred in the report. However, no evidence has been provided.

Moreover, all possible sources of flooding on the development site should be appropriately assessed. This should be clarified by the applicant and updated in the report.

2. We acknowledge that the majority of the proposed drainage strategy is based on infiltration into the ground.

Having the understanding of the area, where the development is being proposed, we would strongly advise that an appropriate ground assessment should be undertaken. This should include full assessment of soil contamination and assessment of possibility of infiltration on the site. This is to limit any potential for sink holes creation.

Moreover, we need to ensure there is no potential for groundwater contamination arising from the proposed development.

3. We note there is an existing surface water drainage network within the development site. We acknowledge the applicant has undertaken a utility survey, where this network has been identified.

However, the entire network has been included on the proposed drainage strategy layout drawing with no additional explanation. The applicant should clarify if it is intended to keep the entire existing drainage network or not.

Moreover, as the strategy is based on discharge into the existing surface water drainage network, a condition assessment of the existing network should be undertaken. We need to make sure that the proposed drainage strategy is viable.

4. Based on the assessment of the location plan, not appropriately included in the submitted drainage report, we note that the proposed development includes within the red line boundary development access road and car parking area.

We would advise that the applicant should clarify how these areas will be drained.

Moreover, we would strongly advise that an appropriate drainage scheme needs to be proposed for the car parking area. We would encourage the applicant to use SuDS features like permeable paving or permeable paving with sub-base. This could provide multiple benefits including additional SuDS management stages and limiting storage volumes in the proposed underground tank soakaways.

5. Following the assessment of the submitted drainage strategy, we note that no information has been submitted on the proposed SuDS management stages. We would advise that the applicant should include this in the drainage strategy. We would like to highlight that the development site lies within the Source Protection Zone 3 and the applicant intends to infiltrate into the ground. This has not been mentioned in the report.

As the LLFA, we recommend a minimum of two SuDS management stages should be provided to manage any potential contaminants arising from surface water runoff from the car parking areas, internal and access roads. This is because the LPA needs to be satisfied that the proposed development will not have a detrimental impact to the water quality of any receiving surface water body with regards to the Water Framework Directive.

6. We note that the applicant intends to discharge an overflow of a minimum of 5 l/s from the site into the existing public surface water sewer.

We would strongly advise that if proposed, the final discharge from the development site should be limited to Greenfield runoff rates for the relevant rainfall events. If this cannot be achieved, strong technical justification should be provided in support.

Moreover, we would advise that the applicant should aim to achieve surface water discharge rates as close as possible to Greenfield runoff rates. This is because we are aware of existing flooding records downstream from the development site.

We would advise that the proposed discharge rates into the public sewer should be indicated on the drainage layout drawing.

7. We acknowledge the existence of quick storage estimates included in the drainage report.

However, as the application is for a residential development, post-development calculations in relation to surface water should include plus 40% for climate change event, not 30% as included in the modelling.

8. As mentioned above, from the provided layout it is unclear how the proposed car parking area and the access will be drained. This should be clarified on the drawing.

Moreover, the proposed discharge rates into the surface water sewer should be indicated on the drawing.

It should be clarified on the drainage layout if the existing drainage network will be retained.

Moreover, we note that the applicant intends to place two major underground tank soakaways in the proposed courtyards for both development sites. We would like to remind that 5 metre buffer zone should be kept from any proposed building. We would advise that this should be indicated on the layout drawing.

9. We understand that the applicant intends to infiltrate the majority of runoff from the proposed development. We note that the infiltration rate has been assumed only.

Where infiltration is proposed as the main means to discharge surface water runoff, we would expect as a minimum the permeability on the site to be confirmed with permeability tests to establish at the outset the feasibility of the proposed drainage strategy. Tests should be conducted to BRE Digest 365 Standards and should also record the ground water levels on the site.

If infiltration is not feasible then an alternate scheme based on attenuation with discharge to a surface water sewer should be provided. We need to make sure that the drainage strategy for the proposed development is feasible and can be implemented. Without working infiltration (supported by BRE Digest 365 Standards infiltration tests) we are not able to state if the proposed drainage scheme is feasible.

10. We note that the applicant intends to discharge an overflow runoff from the site into the existing private surface water network and indirectly into the existing public surface water sewer.

Therefore, we require confirmation from the water company that they are satisfied to receive the proposed discharge at the proposed rates and volumes. We require that this confirmation should be provided prior to the approval of planning permission to ensure that the proposed scheme is feasible. An agreement in principle rather than a formal permission at this stage would be acceptable.

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/>

Informative to the LPA

We understand this is an outline planning application for a hybrid application. However, it is important at this stage to secure major scheme details to establish if the proposed development is feasible.

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