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Date 11 September 2020

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

Dear Clare,

Thank you for your re-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 3.1, dated 5 June 2020;
- Flood Risk Assessment produced by Pinnacle Consulting Engineers, project number C190906, version 2.0, dated 3 June 2020.

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. An updated drainage strategy with a drainage layout.
2. Clarification of the provided SuDS management and treatment stages.

### **Overcoming our objection for the Outline Planning Applications**

1. We acknowledge that the applicant has submitted an updated drainage strategy. An FRA was also submitted to assess all existing flood risks on the development site. The applicant has undertaken BRE 365 infiltration tests, which proved that infiltration is viable on the site.

Having the knowledge of the area, as the LLFA, we are concern about possible ground solutions and creation of potential sink holes. Therefore, further ground investigation will have to be undertaken to assess this potential. This will have to be provided at later design stage.

We understand that risk of contamination has been assessed and there is not significant risk on site. However, our understanding is that the topsoil will be stripped from the site, as a remediation technique. Moreover, we note that shallow groundwater levels are present on the site. Therefore, groundwater monitoring will have to be undertaken following all required remediation on the site and the removal of the topsoil. Further infiltration testing may be also required. This will have to be provided at later design stage and fully incorporated within the drainage strategy. We would like to remind the applicant that a minimum of 1 meter buffer zone needs to be provided between a bottom of any infiltration feature and the existing groundwater levels on the proposed development site.

We note Thames Water agreement has been provided. We understand that 5 l/s of discharge has been agreed from catchment B. We would advise that a flow control should be identified on a plan, as unrestricted connection will not be approved.

We have also assessed the submitted Surface Water Modelling Study produced by JBA. It shows post-development site at high surface water flood risk. Therefore, we would strongly advise these flooding areas have to be incorporated within the proposed drainage scheme. Additional storage volumes may be required. We would like to remind the applicant that no flooding should occur on the site for up to and including the 1 in 30 year event. Any informal flooding for up to the 1 in 100 year plus 40% for climate change should be identified on a map.

Moreover, we note that applicant has clarified that the car park will drain via an existing network, which includes two gullies and direct discharge into Thames Water sewer. We understand that the car park may be constrained, however the current proposal is not acceptable. The car park has to be included in the drainage strategy and needs to be appropriately drained. If there is no possibility of a storage structure being proposed within the car park, this area should be connected into the private

drainage network proposed for the development. We would like to remind that based on the current standards surface water runoff from a development site needs to be managed on site for up to and including the 1 in 100 year plus 40% for climate change. Moreover, based on the modelled high surface water flood risk on the site, as the LLFA we will seek for all impermeable area within the development site to be positively drained.

Based on the above the applicant needs to provide an updated drainage strategy with a drainage layout including any further updates, indicating the proposed discharge rate and all flow control structures.

2. The proposed development site lies within the Source Protection Zone 3 and the applicant intends to infiltrate into the ground. Therefore, an appropriate treatment train needs to be provided.

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.

Based on the provided drainage layout, we note that both catchments include road gullies connected directly into the private network, with petrol interceptors prior to a discharge into tanks. We would not consider this as an appropriate treatment train and the applicant should consider further treatment allowance.

Moreover, as further drainage details are required for the car park area, the applicant should strongly consider treatment train for this area, if a discharge into the ground will be considered.

### **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 has provided a basic maintenance plan. Further details on all required maintenance regime will be required at later design stage. The LPA should ensure the proposed development will be maintain for the lifetime of the development.

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