

Director of Environment & Infrastructure:
Mark Kemp



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Contact David Uncle
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Date 19 March 2020

RE: 6/2019/3024/MAJ – 29 Broadwater Road, Welwyn Garden City, AL7 3BQ

Dear Michael,

Thank you for re-consulting us on the proposed demolition of office building and erection of 128 flats with associated car parking, landscaping, amenity space, bin and cycle storage, with alterations to existing and formation of new access on Broadwater Road and alterations to the existing access on Broad Court at 29 Broadwater Road, Welwyn Garden City, AL7 3BQ.

We have reviewed the following documents submitted in support of this application.

- Flood Risk Assessment prepared by Thomasons, reference C12885-RP-0 – Rev A, dated 07 August 2019.
- Drainage Strategy Statement prepared by Thomasons.
- Drainage Strategy drawing prepared by Thomasons, reference C12885-ZZ-XX-C-0001-P2, issued February 2020.
- Exceedance Flow Paths drawing prepared by Thomasons reference C12885-ZZ-XX-C-0002-P1, dated February 2020.
- Phase 1 (Desk Study) Investigation Report prepared by Listers Geo, report number 18.11.010, dated December 2018.
- C12885 Drainage Strategy prepared by Perega.
- C12885 Surface Water Drainage System Management Strategy prepared by Perega.
- C12885 greenfield runoff rate/volume, surface water network and attenuation tank calculations.

We understand it is proposed to use an attenuation tank comprising approximately 170m³ of storage before discharge to Thames Water surface water sewer at a restricted rate of 2l/s.

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. Evidence that if the applicant is proposing to discharge to the local sewer network, they have confirmation from the relevant water company that they have the capacity to take the proposed volumes and runoff rates.
2. Justification of SuDS selection and identify opportunities to improve flood risk directly by the development site or contribution to local flood risk schemes where appropriate.
3. A list of sustainable drainage treatment stages to ensure there is no detrimental impact to any local watercourses/ground water for water quality and ecological purposes in accordance with the Water Framework Directive.

Overcoming our objection

1. We are pleased it is proposed to discharge at 2l/s and understand that the applicant proposes to discharge to Thames Water surface water sewer.

We require confirmation from the water company or sewer network operator at this stage confirming that they are satisfied to receive the proposed discharge at the proposed rates and volumes. As this is for a full planning application, we require that this confirmation should be provided in a pre-planning enquiry prior to the approval of planning permission to ensure that the proposed scheme is feasible.

2. We understand that the applicant proposes to discharge to geocellular attenuation tank then to Thames Water surface water sewer.

We would consider attenuation tanks less sustainable in accordance with the SuDS hierarchy. The applicant should explore the use of above-ground SuDS features in order to provide additional benefits such as amenity and biodiversity. We require robust justification explaining why above-ground SuDS cannot be implemented on site.

3. We acknowledge that smart sponges on the outfalls from downpipes from the roofs, podium and car park are proposed. We are pleased that a green roof is proposed for the podium deck.

However, we do not consider smart sponges as SuDS management and treatment stages. The applicant should include at least two SuDS management and treatment stages on the site to provide a level of treatment to runoff. We understand that green roofs may be proposed, therefore these areas should be indicated on the drainage strategy. SuDS management and treatment should also be provided for all runoff generated on site including the basement car park.

We note that lined permeable paving could be utilised for the parking areas and above-ground features may be feasible elsewhere on site to provide further treatment.

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.

Informative to the LPA

We ask to be re-consulted with any additional information the applicant may submit. We will provide you with bespoke comments within 21 days of receiving a formal re-consultation. Our objection will be maintained until an adequate surface water drainage assessment has been submitted.

Please note that if the LPA decides to grant planning permission we wish to be notified for our records.

Yours sincerely,

David Uncle
SuDS Officer
Environmental Resource Planning