

Director of Environment & Infrastructure:
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Date 27 January 2021

RE: 6/2020/3420/MAJ – Biopark, Broadwater Road, Welwyn Garden City, AL7 3AX

Dear Clare,

Thank you for your consultation in relation to the above planning application for the demolition of existing buildings and construction of 289 residential units (Use Class C3) and community hub (Use Class E/F.2), with public realm and open space, landscaping, access, associated car and cycle parking, refuse and recycling storage and supporting infrastructure at Biopark, Broadwater Road, Welwyn Garden City, AL7 3AX.

We understand this application seeks full planning permission for a major development, and we have assessed the Flood Risk Assessment and Drainage Strategy report prepared by Curtins Consulting Ltd, reference 077090-CUR-00-XX-RP-D-92001, revision P01, dated 18 December 2020 and the additional information submitted to support 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 submitted surface water drainage strategy.
2. 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

1. We are happy to see the usage of multifunctional features like green roofs or bioretention areas. We noticed the entire access road has been included in the proposed drainage strategy and appropriate treatment has been considered. Moreover, the final discharge from the site will be pumped, but will be limited to 1.6 l/s which corresponds to the 1 in 1 year greenfield runoff rate. Therefore, the proposed drainage strategy, if implemented as proposed, should provide a betterment in terms of surface water management in the area. However, there are some outstanding issues that should be addressed at this stage.

Post development calculations have been provided. We noticed that the designed half drain down times significantly exceed the design standards and our guidance. In principle half drain down times for all SuDS storage features should not exceed 24 hours. We understand this cannot be delivered, based on complexity of the designed site levels. However, as a minimum we expect to see that the proposed drainage scheme has sufficient storage volumes to cope with the 1 in 100 year event followed by the 1 in 30 year rainfall in the next 24 hours. Our understanding is that the current strategy does not currently provide this level of storage, we would therefore advise that the strategy should be updated to fit with this requirement.

In addition, on the submitted drainage layout it has been indicated that within the proposed access road there is another geocellular tank with area of 50m². No mention of this tank has been included in the report. Therefore, the applicant should clarify this, provide full information about the tank and submit an updated drawing.

We understand that blues roofs with available surface water storage within cellular cells will be provided within four communal terraces. No connections from these areas have been indicated on the plan. If an overflow is assumed, this should be clarified by the applicant, as proposed levels of blue roofs have not been included on the plan. Moreover, it should be clarified how flows from these structures will be limited.

In addition, there is an underground tank proposed at the bottom of the parking ramp with a pumped discharge into the higher network. However, it should be indicated how runoff will be collected from the surface, as the submitted plan does not include any collection structure.

We have also noticed that multiple solar panels have been proposed at rooftops of each building. As green roofs have also been considered at each roof space, we would be grateful if the applicant could clarify if this has been accounted for in the proposed green roofs design and if an appropriate consideration was given in the submitted biodiversity net gain estimates.

Any changes based on our comments above should be supported by an updated report, modelling and an updated drainage layout.

2. If a discharge is proposed to a surface water sewer, we require confirmation from the sewer network operator that they are satisfied to receive the proposed discharge at the proposed rates and volumes.

We understand the applicant has submitted a pre-development enquiry to Thames Water, but at the time of writing the report no response has been given.

As this is for a full planning application, we require that this confirmation should be provided prior to the approval of planning permission to ensure that the proposed scheme is feasible.

Informative to the LPA

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 re-consultation. Our objection will be maintained until an adequate surface water management scheme has been submitted.

Yours sincerely,

Julia Puton
SuDS Officer
Hertfordshire County Council