

Director of Environment & Transport:
Mark Kemp



Christopher Dale
Welwyn Hatfield District Council
The Campus
Welwyn Garden City
Hertfordshire
AL8 6AE

Lead Local Flood Authority
Post Point CHN 215
Hertfordshire County Council
County Hall, Pegs Lane
HERTFORD SG13 8DN

Contact Katherine Ashworth
Email FRMConsultations@hertfordshire.gov.uk

Date 30 May 2022

Dear Christopher,

RE: 6/2021/2857/MAJ - Tewin Road, Welwyn Garden City, AL7 1BD

Thank you for your consultation on the proposed change of use from former gasholder site and car dealership (Sui Generis) to industrial processes (E(g)(iii), general industrial (B2) and storage or distribution (B8) to include details of access, servicing, landscaping and boundary treatment.

The applicant has provided the following updated information in support of the application:

- Design and Access Statement by Jefferson Sheard Architects Ref. 1734 - Tewin Road, Welwyn Garden City, dated May 2022.
- Flood Risk Assessment by BWB Ref. TRW-BWB-ZZ-XX-RP-YE-0003_FRA_S2_P04, dated May 2022.
- Sustainable Drainage Strategy by BWB Ref. TRW-BWB-GEN-XX-RP-C-0001_SDS-S2-P02, dated May 2022.
- EA Comments. Ref. NE/2021/133960/01-L01, , dated 22nd December 2021
- Phase 1 & 2 Geoenvironmental Assessment BWB Ref. TRW-BWB-00-XX-RP-YE-0001_Ph1/Ph2, dated September 2021.
- Existing Plan and Proposed Demolition Extents by Jefferson Sheard Architects Ref. 1734-JSA-WY-XX-DR-A-00001, dated August 2021.
- Location Plan by Jefferson Sheard Architects. Ref. 734-JSA-WY-XX-DR-A-01001, dated August 2021.
- Proposed Landscape Details by Jefferson Sheard Architects Ref. 1734-JSA-WY-XX-DR-A-01203, dated August 2021.

We understand that the site is a brownfield site which was a former National Grid gasholder site that has been decommissioned and demolished. We are aware that cadent Gas Ltd own an indented section of the site boundary.

We understand it is proposed to discharge to the existing surface water sewer serving the site via one connection draining into the surface water manhole 6101. There are known sewer capacity issues in the vicinity of the development site, therefore discharge rates from the brownfield site need to be restricted to the equivalent greenfield runoff rate. We accept that in order to protect groundwater quality from any further deterioration, infiltration is not a viable discharge mechanism for this development site.

We have reviewed the information submitted by the applicant in support of the planning application. However, the information provided to date does not provide a suitable basis for an assessment to be made of the flood risk arising from the proposed development. Therefore, we object to the grant of planning permission. In order for the Lead Local Flood Authority to advise the relevant Local Planning Authority that the site will not increase flood risk to the site and elsewhere and can provide appropriate sustainable drainage techniques the following information is needed:

1. Restriction of discharge to greenfield runoff rates and volumes
2. Clarification of post-development calculations
3. Final drainage layout for full planning application
4. Surface water exceedance plan and management
5. Adoption and maintenance information
6. Provision of robust SuDS management and treatment train

Overcoming our objection

In order to overcome our objection, please see below comments.

1. We understand it is proposed to drain to the existing surface water sewer at 47.8l/s.

We are pleased the applicant proposes an attenuation tank to provide surface water attenuation, however the applicant should seek to discharge the entire site at greenfield runoff rates.

Therefore, additional attenuation capacity may be required in order to reduce the discharge to greenfield runoff rates.

2. We are pleased the applicant has provided detailed post-development network calculations for all events up to and including the 1 in 100 year + 40% climate change event. However, we would request the following clarifications.

Half drain down times have not been provided. Please could the applicant provide half drain down times for all proposed attenuation features and all storm events, noting that they should not exceed 24 hours.

Furthermore, we note that a flooded volume of 13.93m³, 0.235 m³, 21.311m³, 6.434m³ and 4.774m³ is indicated to occur during the 1 in 100 year + 40% climate change storm at pipe numbers S1.001, S1.003, S1.005, S2.000 and S2.001 respectively. While we would not object to this in principle, we require the applicant to provide the location, depth, volume and area of this flooding on a drainage plan. We would recommend that this flooded volume is reduced as far as is practicable.

3. We note that the proposed drainage strategy states that the final required attenuation storage volume will be determined during the detailed design stage. This suggests that the drainage scheme is subject to change. As this is a full application where the layout of the development is determined with regards to existing and proposed utilities, the drainage scheme needs to be final and not indicative. We will advise the LPA once a drainage scheme is agreed, an appropriate compliance condition is applied should planning permission be granted. It is therefore important that certain details of the drainage scheme are agreed at full planning stage.

In addition, in Table 6.1 of the Drainage Strategy it is proposed to incorporate channel drain sumps and catchpit manholes in the proposed SuDS features however, the location of some proposed SuDS measures, pipe runs, discharge points and informal flooding is not included on this final drainage layout. This should be updated and appropriately indicated on a drawing.

4. The proposed surface water drainage scheme should be designed to cater for all rainfall events up to and including the 1 in 100 year + climate change event. There should be no flooding up to the 1 in 30 year rainfall event. Where this occurs this will be considered as 'informal' flooding and this should be managed within the site, demonstrating it will not increase flood risk to the site and the surrounding area. The extent and depths of these areas should be shown on a plan in relation to the proposed site levels.

Any flooding of the drainage system above the 1 in 100 year + climate change event is considered as an exceedance event and it should be shown on a development and drainage layout plan where these areas are and where surface water will flow, demonstrating there will be no increase in flood risk to the surrounding area. Capacity within upstream pipes, channels and filter drains should be accounted for at this stage.

5. It is important to understand when developing the drainage strategy, who will be adopting the proposed drainage features, associated infrastructure, and any discharge mechanisms from the site. Those adopting and maintaining the drainage may have their own requirements which should be considered as early as possible in the drainage design process. As this is the detailed design stage, we require the Operational and Maintenance manual for the development site.
6. The applicant should demonstrate that sufficient water quality treatment stages have been provided, referring to the CIRIA SuDS Manual Simple Index Assessment based on the use of the areas being drained and proposed measures. There is no SuDS management and treatment proposed for the industrial site with large areas of car parking and roads/service yards. Therefore, the applicant should fully consider the inclusion of robust SuDS management and treatment for all road or parking areas on site as we will not accept road or parking areas to drain directly to the network with no treatment. For the proposed parking areas, we would expect sufficient treatment to be provided in line with the SuDS Manual pollution index assessment. It is very important that an appropriate treatment train of surface water runoff will be provided prior to any discharge from the development site to limit the potential for contamination off site.

For further advice on what we expect to be contained within the FRA to support an outline planning application, please refer to our Developers Guide and Checklist on our surface water drainage webpage.

<http://www.hertfordshire.gov.uk/services/envplan/water/floods/surfacewaterdrainage/>

This link also includes HCC's policies on SuDS in Hertfordshire.

Informative to the LPA

We have provided comments from the Lead Local Flood Authority in this letter. However, due to the LLFA SuDS team staff shortages, we may not be able to provide further advice at this site.

Please note if the LPA decide to grant planning permission, we wish to be notified for our records should there be any subsequent surface water flooding that we may be required to investigate as a result of the new development.

Yours sincerely

Katherine Ashworth
SuDS and Watercourses Support Officer
Environment & Transport