

David Elmore
Local Planning Authority
Welwyn Hatfield Borough 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
www.hertfordshire.gov.uk

Contact Flood Risk Management Team
Email FRMConsultations@hertfordshire.gov.uk

Date 29 August 2023

Dear David,

RE: 6/2022/1355/MAJ - Former Beales Hotel Comet Way Hatfield AL10 9NG

Thank you for your consultation on the above site, received on 22 June 2023 for the demolition of existing building and construction of 145 residential units (Use Class C3) with private and communal amenity space, landscaping, access, associated car and cycle parking, refuse and recycling storage and supporting infrastructure at the Former Beales Hotel, Comet Way, Hatfield, AL10 9NG. We have reviewed the application as submitted and wish to make the following comments.

We note the applicant has undertaken discussions with the LLFA in response to the latest LLFA response. The applicant has provided a Flood Risk Assessment (FRA) and SuDS Strategy to account for the local flood risk issues and surface water drainage at this location. Following a review of the submitted documents, the details are in accordance with NPPF and local planning policy SP10 Sustainable Design and Construction.

We have **no objection subject to conditions being attached to any consent** if this application is approved, and the Applicant is in agreement with pre-commencement conditions. We suggest the following wording. If the following conditions are not included, the development would be contrary to NPPF and local planning policy SP10 Sustainable Design and Construction and we would object until such time that the details below are submitted for review.

We have reviewed the information submitted and wish to suggest the following wording for new conditions, as follow:

Condition 1

Due to the risk of hydraulic overloading of the foul sewer system at this location, there shall be no surface water discharge to the foul sewer from this development.

Reason: To ensure that the development achieves a high standard of sustainability and ensure the flood risk is adequately addressed for each new dwelling and not increased in accordance with NPPF and Local Planning Policy SP10 Sustainable Design and Construction.

Condition 2

Prior to the commencement of development, construction drawings of the surface water drainage network, associated sustainable drainage components and flow control mechanisms and a construction method statement shall be submitted and agreed in writing by the Local Planning Authority. The scheme shall then be constructed as per the agreed drawings, FRA (Flood Risk Assessment and SuDS Report prepared by EAS, Ref: 3657/2022, Rev Final D, dated 21 June 2023) and remaining in perpetuity for the lifetime of the development unless agreed in writing by the Local Planning Authority. No alteration to the agreed drainage scheme shall occur without prior written approval from the Local Authority.

Reason: To ensure that the development achieves a high standard of sustainability and to comply with NPPF and Local Planning Policies: Policy SP10 Sustainable Design and Construction.

Condition 3

The development hereby approved shall not be first occupied until detailed maintenance and management plan of the whole sustainable drainage scheme has been submitted to and approved in writing by the Local Planning Authority. The drainage scheme shall be implemented prior to the first occupation of the development hereby approved and thereafter managed and maintained in accordance with the approved details in perpetuity. The Local Planning Authority shall be granted access to inspect the sustainable drainage scheme for the lifetime of the development. The details of the scheme to be submitted for approval shall include:

- I. a timetable for its implementation; and
- II. a management and maintenance plan for the lifetime of the development which shall include the arrangements for adoption by any public body or statutory undertaker, or any other arrangements to secure the operation of the sustainable drainage scheme throughout its lifetime. Specifically, the maintenance measures should be identified for all surface water drainage element as proposed within the scheme.

Reason: To ensure that the development achieves a high standard of sustainability and ensure the flood risk is adequately addressed for each new dwelling and not increased in accordance with NPPF and Local Planning Policy SP10 Sustainable Design and Construction.

Condition 4

Upon completion of the surface water drainage system, including any SuDS features, and prior to the first occupation of the development; a survey and report from an independent surveyor shall be submitted to and approved in writing by the Local Planning Authority. The survey and report shall demonstrate the surface water drainage system has been constructed in accordance with the details approved pursuant to Condition 1 and Condition

2. Where necessary, details of corrective works to be carried out along with a timetable for their completion, shall be included for approval in writing by the Local Planning Authority. Any corrective works required shall be carried out in accordance with the approved timetable and subsequently re-surveyed with the findings submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure the flood risk is adequately addressed, not increased and users remain safe for the lifetime of the development in accordance with NPPF and Policy SP10 Sustainable Design and Construction.

Condition 5

All development shall be constructed in accordance with the submitted and approved Flood Risk Assessment (Flood Risk Assessment and SuDS Report prepared by EAS, Ref: 3657/2022, Rev Final D, dated 21 June 2023), this includes all new residential dwellings to have a finished floor level raised a minimum of 150 mm above the surrounding proposed ground level unless otherwise first approved in writing by the Local Planning Authority.

Reason: To ensure the flood risk is adequately addressed and not increased in accordance with NPPF and Policy SP10 Sustainable Design and Construction.

Condition 6

Prior to the commencement of the development details of all flood resilient and resistant measures shall be submitted to and approved in writing by the local Planning Authority. The agreed measures shall then be installed and maintained in perpetuity.

Reason: To ensure the flood risk is adequately addressed and not increased in accordance with NPPF and Policy SP10 Sustainable Design and Construction.

Please note if, you the Local Planning Authority review the application and decide to grant planning permission, you should notify the us, the Lead Local Flood Authority, by email at FRMConsultations@hertfordshire.gov.uk.

Yours sincerely

Katherine Ashworth
SuDS and Watercourses Support Officer
Growth & Environment

Annex

The following documents have been reviewed, which have been submitted to support the application;

- Flood Risk Assessment and SuDS Report prepared by EAS, ref 3657/2022 Rev Final D, dated 21 June 2023.
- EAS Response to LLFA Comments prepared by EAS, no ref, subject 6/2022/1355/MAJ – Former Beales Hotel Comet Way Hatfield AL10 9NG, no date.
- Flood Risk Assessment and SuDS Report prepared by EAS, ref 3657/2022 Rev Final B, dated 03 May 2022.
- EAS Response to LLFA Comments prepared by EAS, no ref, subject 6/2022/1355/MAJ – Former Beales Hotel Comet Way Hatfield AL10 9NG, dated 11 January 2023.
- Site Location Plan, prepared by Alan Camp Architects, drawing no. GA-SL-00 Rev PPL01, dated 27 May 2022.
- Proposed Site Plan, prepared by Alan Camp Architects, drawing no. GA-SP-L00 Rev PPL01, dated 27 May 2022.
- Landscape Masterplan, prepared by Guarda Landscape, drawing no. GUA-DR-L-015 Rev P02, dated April 2022.
- Phase I Geoenvironmental Assessment Report, ref 1444 R01:Issue 2.1, dated 28 April 2022.