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Environment Director & Chief Executive: John Wood



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Date 04 November 2015

RE: 6/2015/1997/MAJ Comet Hotel, AL10 9RH Wel-Hat

Dear June,

In the absence of an acceptable FRA we object to the grant of planning permission and recommend refusal on this basis for the following reasons:

The FRA carried out by Curtins Consulting Limited reference ICBR0037-RP-001 dated September 2015 submitted with this application does not comply with the requirements set out in the Planning Practice Guide (as revised 6 April 2015) to the National Planning Policy Framework. The submitted FRA does not therefore provide a suitable basis for assessment to be made of the flood risks arising from the proposed development.

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 required as part of the flood risk assessment;

www.hertsdirect.org

1. Demonstration of a feasible surface water discharge location.
2. Detailed pre and post development surface water run-off rates and volume calculations for all rainfall events up to and including the 1 in 100 year + climate change event.
3. Identify overland flow routes and demonstrate post development exceedance routes.

Overcoming our objection

To address the points above, see comments below;

1. It is not clear where the site will discharge to. Three possible options have been mentioned within the FRA. Option one proposes the use of infiltration measures. If this option is to be considered further infiltration tests in accordance with BRE Digest 365 will be required to be carried out to demonstrate that it will be feasible.

Option 2 proposes discharge into the Ellen Brook. Where the Ellen brook reaches the St Albans Road West it becomes a main river therefore we require confirmation from the EA that they are satisfied with discharge in to the main river. We note that a piped surface water outfall into Ellen Brook is being proposed under a Section 104 agreement with Thames Water. However we require further details on how the connection from the Hotel to the Ellen Brook will be made as the Ellen Brook is approximately 373m away from the site.

Any connection to Thames Water requires confirmation from Thames that they are satisfied with the connection. Please note consent will also be required from the Environment Agency for a new outfall headwall into the main river under the Water Resources Act 1991.

We note for option 3, it has been assessed to discharge into the existing combined sewer. We note confirmation from Thames Water has been acquired. As the existing drainage system is to a combined sewer, this is not sustainable as it mixes clean surface water with foul drainage and the surface water could surcharge the foul system. We would advise that unless this is the only option of discharge, an alternative discharge location is provided.

2. Surface water drainage calculations should be provided as evidence to support the proposed drainage strategy. These are required to ensure that site has the capacity for all rainfall events up to and including the 1 in 100 year plus climate change event and ensure there is no increase flood risk. We note that that surface water run-off will be limited to 6.55l/s and 1400m³ of attenuation is required. However we require design calculations for the proposed SuDS components to ensure the drainage strategy has the capacity for all rainfall events up to and including the 1 in 100 year plus climate change event.

3. To establish the overall drainage strategy, it should be understood where there are existing overland flow paths based on topographical surveys and individual catchments within the site. These routes should be identified for all rainfall events including and over 1 in 30 year, 1 in 100 year and the 1 in 100 year plus 30% allowance for climate change. These are important to show where these flows are located, along with an assessment of existing surface water flood risk and how they will be managed to ensure there is no increase in flood risk.

Routes of exceedance will also need to be assessed and identified for rainfall events that exceed the 1 in 100 year + climate change event.

Informative to the LPA

As the site lies above a Principal Aquifer and Groundwater Protection Zone 2, two SuDS treatment stages should be provided to manage any potential contaminants from surface water run-off from car parking areas and access roads. This will also apply where surface water is diverted into the Ellen Brook. The LPA should have regard to the Water Framework Directive in relation to water quality.

The applicant can overcome our objection by submitting an FRA which covers the deficiencies highlighted above and demonstrates that the development will not increase risk elsewhere and where possible reduces flood risk overall. If this cannot be achieved we are likely to maintain our objection to the application. Production of an FRA will not in itself result in the removal of an objection.

We ask to be re-consulted with the results of the FRA. We will provide you with bespoke comments within 21 days of receiving formal re-consultation. Our objection will be maintained until an adequate FRA has been submitted.

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.hertsdirect.org/services/envplan/water/floods/surfacewaterdrainage/>

Yours sincerely,

Sana Ahmed

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