

Environment Director & Chief Executive:
John Wood



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Lead Local Flood Authority
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Hertfordshire County Council
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Date 22 September 2016

RE: 6/2016/1740/LB - Comet Hotel, St Albans Road West, Hatfield, AL10 9RH

Dear June,

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

The FRA produced by Curtins, reference ICBR0037-RP-001 Revision 03 dated 19 August 2016 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 surface water drainage strategy 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 FRA:

- 1) Detailed drainage calculations that demonstrate that no flooding will take place during any rainfall event below the 1 in 30 year return period event; and that there is no internal flooding of the properties up to the 1 in 100 year event + 40% climate change allowance.
- 2) Updated climate change allowances.

Overcoming our objection

Appendix E of the FRA includes the *quick storage estimates* provided by the modelling software. However, it is clearly indicated that “*these values should not be used for design purposes*”. Therefore, the applicant needs to provide detailed calculations that

demonstrate that the proposed attenuation volumes will ensure that there is no flooding on site up to and including the 1 in 100 year event plus 40% climate change allowance. Please note that the 19 February 2016, the updated climate change allowances were released to support NPPF. Therefore all Flood Risk Assessments and Drainage strategy for planning applications validated on or after this date should apply the updated climate change allowances when calculating peak rainfall intensity. Looking at worst case scenario, for the design SuDS feature we recommend that upper end allowance (+ 40% in this case) to be applied.

For further guidance on HCC's policies on SuDS, HCC Developers Guide and Checklist and links to national policy and industry best practice guidance please refer to our surface water drainage webpage

<http://www.hertsdirect.org/services/envplan/water/floods/surfacewaterdrainage/>

Informative to the LPA

The applicant can overcome our objection by submitting a drainage strategy 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 a drainage strategy will not in itself result in the removal of an objection.

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

Yours sincerely,

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