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Date 08 June 2018

**RE: 6/2018/1338/FULL – Premier Inn, Stanborough Road, Welwyn Garden City, AL8 6DQ**

Dear Clare,

Thank you for your consultation in relation to the above planning application for the Erection of a three-storey extension to the northern elevation of the existing hotel and a single storey extension to existing entrance lobby (C1), alterations to car parking layout, landscaping and associated works, at Premier Inn, Stanborough Road, Welwyn Garden City, AL8 6DQ.

We understand this application seeks full planning permission for a major development, and we have assessed the Flood Risk Statement and Sustainable Drainage Strategy prepared by GD Partnership Limited Consulting Engineers, reference 18022/PG, dated 8<sup>th</sup> May 2018, submitted to support to 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 Lead Local Flood Authority 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. Confirmation of the means to discharge off-site the surface water from the site and evidence that is feasible (i.e. agreement to connect from water company).

2. A detailed drainage plan including the location of all SuDS features, pipe runs, discharge points and any potential informal flooding supported by appropriate calculations.
3. Identified exceedance flow paths for surface water for events greater than the 1 in 100 year + climate change.
4. Details of any required maintenance of any SuDS features and structures and who will be adopting these features for the lifetime of the development. Please note that for residential development the lifetime is 100 years.

### **Overcoming our objection**

1. We note the applicant has proposed to drain the developed part of the site only. This would include underground tank restricted to discharge of 1.4 l/s into the existing surface water drainage network on site. It should be clarified where this network is connecting.

If a discharge is proposed to a sewer we require confirmation from the water company or sewer network operator that they are satisfied to receive the proposed discharge at the proposed rates and volumes. 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. An agreement in principle rather than a formal permission at this stage would be acceptable.

2. We note the applicant has provided the Surface Water Drainage General Arrangement drawing.

However, all drainage arrangements for the entire development site should be included within the drainage layout. This should include the existing drainage network on site and all connection points into the wider drainage system. The attenuation volume provided within the system should be indicated on the drawing as well.

Our requirement for a drainage strategy is to demonstrate that no flooding of the site should occur at or below the 1 in 30 year event and any informal flooding of the site above this should be safely contained within the site with no flooding to property or buildings. If areas are to be designated for informal flooding these should also be shown on a detailed site plan.

Please note all drawings are to be the final design.

3. Routes of exceedance will also need to be assessed and identified on a drawing for rainfall events that exceed the 1 in 100 year plus climate change event.
4. The applicant will need to satisfy the LPA that the proposed drainage scheme can be adopted and maintained for its lifetime by providing a maintenance plan, detailing key operations and management. The maintenance of soakaways and the cellular

storage structure must be appropriate to prevent the risk of failure or reduction of its capacity. Underground and any mechanical features are likely to carry a higher risk as a result of poor maintenance.

### **Informative to the LPA**

We recommend the LPA to obtain a maintenance plan that explains and follows the manufacturer's recommendations for maintenance or that it follows the guidelines explained by The SuDS Manual by CIRIA. A maintenance plan should also include an inspection timetable with long term action plans to be carried out to ensure efficient operation and prevent failure.

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

Yours sincerely,

Julia Puton  
SuDS Officer  
Hertfordshire County Council