

Director of Environment & Infrastructure:  
Mark Kemp



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Date 25 March 2019

**RE: 6/2019/0370/COND – Comet Hotel, St Albans Road, West Hatfield, AL10 9RH**

Dear William,

Thank you for consulting us on the above application for the submission of details pursuant to condition 7 (Hard and Soft Landscape Plan) 8 (Tree, Shrub or Hedge works ) 10 (Approved Landscaping Plans) 13 (Location, Design and Specification of Refuse Bin and Recycling Materials ) 17 (Urban Drainage ) and 22 (Scheme for odour control) on planning permission 6/2016/1739/MAJ, at Comet Hotel, St Albans Road, West Hatfield, AL10 9RH.

In relation to conditions 7, 8, 10, 13 and 22, this is something we cannot advise on, as it does not relate to flood risk or surface water drainage.

In relation to condition 17, as we did not recommend this condition we are not in a position to formally recommend its discharge. However, we have been asked by the LPA to offer advice to place them in a position to make their own decision on whether to discharge the conditions.

**Condition 17 states:**

*No building hereby permitted shall be occupied until a sustainable urban drainage scheme for the site has been submitted to and approved in writing by the Local Planning Authority. Unless agreed in writing, the scheme shall meet the following specifications further to the Flood Risk Assessment v3 (19.8.2016), prepared by Curtins (ICBR0037RP-001):*

- a) limiting the surface water run-off by storm events to not exceed 5.5l/s during the 1 in 100 year event and climate change event*
- b) providing attenuation – a minimum of 735 cubic metres of total storage volume in permeable pavements, filter trenches and underground attenuation tanks as shown in Appendix G of the drainage strategy*
- c) Discharge of surface water from the site into Ellen Brook via a new off-site connection.*

*The sustainable urban drainage scheme shall be managed and maintained thereafter in accordance with a management and maintenance plan to be submitted to and agreed by the Local Planning Authority.*

*REASON: To protect the surrounding environment from pollution and flood risk by ensuring the satisfactory disposal, storage and drainage of surface water from the site in accordance with Policies R7 and R8 of the Welwyn Hatfield District Plan 2005.*

We advise the LPA that the information submitted in support of condition 17 in relation to surface water does not comply with the requirements set out in condition 17. Therefore, we recommend to the LPA not to discharge condition 17.

We note that the applicant has submitted an updated drainage layout. Moreover, we note that the final discharge location has been updated and does not include discharge of surface water from the site into Ellen Brook via a new off-site connection. Therefore, as the LLFA, we believe that the updated drainage strategy does not comply with condition 17.

Moreover, if the applicant intends to discharge surface water from the site into the existing third party private drainage off site (which has not been yet adopted), we would strongly advise the LPA that an agreement should be provided from third party landowner that they agree with the proposed connection location and the proposed discharge rate.

We note that the applicant has submitted drainage schedule sheets, drainage construction details drawings and an updated modelling. We have noticed that the applicant has identified a flooding within the 1 in 100 year plus climate change allowance. Therefore, we would advise the LPA that these areas should be identified on a drainage layout with identified depths and extents.

Moreover, we note that the submitted modelling manages the run-off from the site for up to and including the 1 in 100 year event including 30% only for climate change allowance, which does not comply with the current standards. As the LLFA, we have objected to this approach while commenting on the planning application 6/2016/1739/MAJ and requested including 40% for climate change allowance. However, the LPA decided to approve the application. Therefore, we can confirm that the submitted modelling complies with the modelling previously approved by the LPA.

No detailed management and maintenance plan has been provided as well.

Moreover, as stated on the drainage layout and as this is a pre-occupation condition, we believe that a CCTV survey should be undertaken and results should be submitted to the LPA.

### **Informative to the LPA**

The LPA will need to be satisfied that proposed drainage scheme will be maintained and managed for the lifetime of the development.

We would like to highlight to the LPA that the applicant has changed the final surface water drainage discharge location. Therefore, as the LLFA, we believe that the updated drainage scheme does not comply with condition 17. We would advise that the applicant should clarify this with the LPA.

Moreover, we would strongly advise the LPA that the applicant should provide an agreement from third party landowner that they agree with the proposed connection location and the proposed discharge rate.

Should the LPA decide not to discharge condition 17 and require further information from the applicant, we would be happy to offer any further advice on any subsequent information received by the LPA.

Please note if the LPA decide to grant planning permission we wished 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,

Julia Puton  
SuDS Officer  
Hertfordshire County Council