Department of Environment & Transport
and Sustainable Growth

Hertfordshire

David Elmore
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**

Contact Sophie Taylor
Email FRMConsultations@hertfordshire.gov.uk

Date 2 November 2022

Dear David

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

Thank you for consulting the LLFA on the above application 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

The applicant has submitted the following information in support of their application in relation to flood risk and management of surface water;

- Flood Risk Assessment and SuDS Report dated May 2022 prepared by EAS

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 and management of surface water. We therefore object to the grant of planning permission and recommend refusal on this basis for the following reasons;

1. Compliance with the SuDS hierarchy
2. Lack of appropriate surface water quality treatment
3. Lack of a surface water management train
4. Insufficient surface water calculations
5. Confirmation of the surface water discharge location

The current proposal is to discharge all surface water run-off from the roof, car park and access road areas to an underground tank beneath the under-croft car park which will then need to be pumped into a Thames Water sewer (subject to permission) at a discharge rate of 3.5l/s.

**Point 1**

We understand that the built development takes over the majority of the space within the redline boundary, therefore above ground landscaped SuDS have been discounted by the applicant on this site. However, there are other options available higher up on the SuDS hierarchy before opting for the use of an underground tank to attenuate all surface water as proposed.

The applicant needs to explore other options such as a green/blue roof for the roof area which takes up the majority of the impermeable area. Rain gardens at the bottom of each roof downpipe may also be an option to manage the lower rainfall events. The applicant also needs to explore the use of permeable materials on the access road which can either infiltrate (if demonstrated to be viable) or integrated with a subbase prior to discharge.

**Point 2**

There is no water quality treatment as part of the proposed surface water drainage strategy. The proposed tank will not offer any treatment and even with integrated catchpits, will increase the required maintenance to the tank and the catchpits themselves. Prior treatment stages such as permeable paving, filter strips etc in particular from the access road should be provided prior to discharge into the attenuation feature, should a tank be the only technically viable option.

As stated in point 1 a green roof/blue roof should be explored for the management of surface water treatment from the roof area.

**Point 3**

As stated in Point 1, the applicant has only provided 1 management feature for surface water with an underground tank, which is located in the under-croft car park. Surface water should be managed in stages to manage lower to higher and short and long rainfall events, providing resilience in the system and reduce the risk of failure, requirement for maintenance and water quality treatment.

**Point 4**

Whilst we appreciate at this stage infiltration testing is limited, the applicant has provided an option to discharge surface water into an existing Thames Water sewer. As this is a full application, we require full detailed surface water calculations based on this option including all rainfall events up to and including the 1 in 100 year + climate change event for the pre and post development site.

**Point 5**

It is stated that further infiltration testing will need to be carried out post planning permission to allow for the demolition of the existing building due to the limited areas that can be tested. Infiltration has therefore not been discounted and should be given priority where viable. As this is a full planning application however, the applicant needs to demonstrate a feasible means of discharge off site at this stage to ensure surface water

can be managed should it be determined that infiltration is not viable. The applicant is proposing to discharge into a sewer which lies outside of the redline planning boundary and therefore crosses third party land. As this is a full application evidence is required at this stage to confirm the discharge location is permitted by all relevant parties.

Once this information is provided and an acceptable drainage scheme based on an appropriate SuDS management and treatment train is provided, we may be in a position to recommend an appropriate condition for additional infiltration testing to be carried out. Should it then be demonstrated infiltration is fully or partially viable, the applicant will need to provide an amended drainage scheme complying with the principles agreed at the full planning stage.

However as this is a full planning application, final details of the drainage scheme including detailed surface water calculations should be provided including location of SuDS features, pipe runs and other associated drainage infrastructure.

For further advice on what we expect to be contained within the FRA to support a full planning application, please refer to our Developers Guide and Checklist on our surface water drainage webpage https://www.hertfordshire.gov.uk/services/recycling-waste-and-environment/water/surface-water-drainage/surface-water-drainage.aspx this link also includes HCC's policies on SuDS in Hertfordshire.

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

Sophie Taylor
SuDS and Watercourses Support Officer
Environment & Transport and Sustainable Growth