

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 [REDACTED]

Date 22 December 2022

Dear David

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

Thank you for re-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 and in response to our letter dated 2 November 2022:

- E-mail response dated 17 November 2022 prepared by EAS

The applicant has previously provided the following information:

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

However, the information provided to date does not satisfy all our previous points of objection and therefore 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 maintain our objection to the grant of planning permission until the following information is provided and acceptable:

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 most 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.*

The applicant has reiterated what has been 'considered' and what 'could be' provided within the drainage strategy to comply with the SuDS hierarchy however the drainage strategy has not been amended to include these measures showing on a complete drainage plan. As this is a full application with the final layout being agreed, a commitment to the use of other SuDS measures should be provided at this stage.

### **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.*

As stated in Point 1, no amendments have been made to show a commitment to the use of non-proprietary products to treat the surface water run-off. The use of smart sponges requires regular maintenance and replacement and is not a sustainable way of collecting diffuse pollution at source. We understand that infiltration has not been confirmed, we would therefore expect the applicant to provide sustainable solutions that do not rely on infiltration such as lined filter strips/ permeable paving.

As stated in Point 1 there needs to be a commitment to the use of these options showing their location and extent on a final drainage plan as would be expected for a full planning application. The use of permeable tarmac/paving on the access road would not require any additional space.

### **Point 3**

*As stated in Point 1, the applicant has only provided 1 management feature for surface water with an underground tank, which is 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.*

The applicant has stated that 3 management features have been proposed to manage surface water, including a green/blue roof, permeable paving and tank. However only the tank has been shown on the drainage plan and this is the only feature that has been committed to within the drainage strategy report. All other options have been stated as 'could be', not providing any commitment to their use.

### **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.*

As stated above, we require detailed surface water calculations for the alternative discharge option into the Thames Water sewer at the rate of 3.5l/s. These calculations should also include the other drainage features which are now stated as 'proposed', including the permeable paving.

### **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.*

The applicant has provided the relevant correspondence from Thames Water to demonstrate a feasible discharge mechanism should infiltration not be viable. We are therefore satisfied with Point 5.

The applicant still needs to provide information in relation to Points 1, 2, 3 and 4, demonstrating a commitment to the use of appropriate SuDS measures higher up on the hierarchy and that provide water quality treatment. Once this information is provided and an acceptable drainage scheme based on an appropriate SuDS management and treatment train is provided, we may be able 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.

We would also suggest that the LPA require a plan indicating how surface water will be managed on site during the construction phase to ensure the development does not increase flood risk off site while works are underway.

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.

Yours sincerely

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