

Jessica Moore

From: David Elmore
Sent: 21 November 2022 12:30
To: Validation (Shared Mailbox)
Subject: FW: Former Beales Hotel (ref: 6/2022/1355/MAJ) - LLFA Response
Attachments: Thames Water email.pdf

Categories: Jessica

Hi Support,

Please add the below email and attached pdf to this application (redact where necessary), make the redacted versions public, and then re-consult the Lead Local Flood Authority.

Please let me know when complete.

Thank you.

David.

David Elmore
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From: Rose Adams [REDACTED]
Sent: 17 November 2022 16:24
To: FRMConsultations [REDACTED]
Cc: David Elmore <d.elmore@welhat.gov.uk>; David Uncle <david.uncle@hertfordshire.gov.uk>; Mark Westcott [REDACTED] Bridget Miller [REDACTED]
Subject: Former Beales Hotel (ref: 6/2022/1355/MAJ) - LLFA Response

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Hi Sophie,

Thank you for providing your response to the Former Beales Hotel application (ref: 6/2022/1355/MAJ) on the 2nd November (attached).

Our flood risk consultant has reviewed your response and has provided the following comments set out below. We trust these comments satisfy your concerns.

Dear Rose,

Please see below a summary response for each of the points raised by the LLFA. The report has detailed information which should answer the questions raised by the officer and I have referred to the relevant sections where this information can be found. Concerningly the officer seems to be pushing towards an infiltration strategy with a suggestion of filter strips as a treatment stage. This is not viable here. The initial testing undertaken demonstrates traditional soakaways is unlikely to be suitable but most importantly there is no suitable location onsite 2.5m from the site boundary and 5m from the proposed building and 2m from the road where an infiltration device could be located.

It has not been possible to provide pipe runs, manhole chamber locations etc as this level of information is not available yet. Post demolition and when the detailed design takes place (e.g. final site level and confirmation of the location of downpipes) it will be possible to provide this but importantly it has been demonstrated the site has a suitable surface water drainage strategy which has been discussed with Thames Water.

Point 1-

- With regards to green roof/blue roofs, section 5.18-5.22 in the submitted report discusses the green roof potential at the site on the 7th floor. A feature that is proposed to be integrated with PV panels.
- The first floor and fifth floor also comprise of a large communal amenity areas which blue/green roof features could be explored. These areas are functional spaces and by nature are likely to include area of planting.
- Rainwater downpipes are not specified at this stage however I believed these are likely to be internal downpipes. Nonetheless I do not believe there is sufficient space along the perimeter of the building for raingardens. When reviewing the ground floor plan, no suitable space can be found along the western boundary for example, this area should be kept open for access. Along the northern boundary, this area cannot be accessed for maintenance.
- Please review sections 3.12-3.16 which explores the infiltration viability at the site and details the infiltration test which were undertaken at the site. Paragraph 5.13 notes "At a later stage and subject to final site levels and further infiltration tests, lined or unlined paving could be utilised for the internal road and footpaths." We have thus explored and proposed the used of lined/unlined paving where possible.

Point 2-

- As above, green roofs have been considered and provide a treatment stage where applied
- A smart sponge has been proposed to offer further treatment prior to discharge into the tank . Smart Sponge[®] applications are able to remove up to 95% of all oil contaminants present in stormwater run-off.
- Noteworthy, the car park area is under croft and rainfall will not mobilise any contaminants associated with this area.
- As above, permeable paving has been considered and will provide treatment stage where applied.

Point 3-

- A total of 3 management features have been proposed, green roofs, paving and the attenuation tank. The green roof and roof level amenity areas again likely to be largely planted areas would manage day to day rainfall events however the attenuation tank can provide the required attenuation for the critical drainage events which we must model too.

Point 4-

- Is the officer asking for calculations based on an infiltration strategy? Simply, an infiltration strategy is not viable here.
- Infiltration tests were undertaken in February 2022 to BRE365. Results were not favourable to traditional deep soakaway devices and the site layout is not conducive to the use of soakaways in line with Building Regulations or CIRIA Guidance. Please note there is also a small basement level present.

Point 5-

- Paragraphs 5.23-5.24m note: "Thames Water have agreed in principle to a new surface water sewer located in footway/verge of Comet Way in order to connect to the nearest surface water sewer (MH 563L) located approximately 160m north east of the site off Harpsfield Broadway. A S106 application will need to be applied for post planning. Email correspondence with Thames Water are enclosed in Appendix J."
- I enclose the Thames Water correspondence in this email. Evidence therefore has been provided that the proposed surface water strategy has been discussed and agreed in principle with the relevant parties.

I hope the above clarifies these concerns raised by the officer.



Rose Cargill

Senior Flood Risk Consultant

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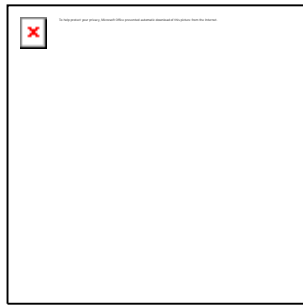
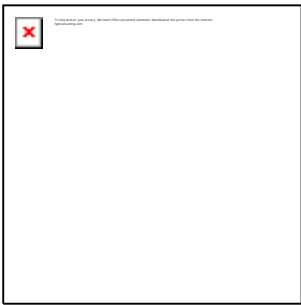
Please let us know if you require any further information.

We look forward to hearing from you.

Thank you,

--

Rose Adams
Assistant Planner



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