

Growth & Environment

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Contact: SuDS and Watercourses Team
FRMConsultations@hertfordshire.gov.uk

Your ref: 26/00990/DOC
Date: 7 August 2026

Dear Mr Chaston

RE: Details reserved by Condition 26 (Surface water drainage) of planning permission reference 24/02758/FP granted on 10 December 2025 at Guysfield Residential Home, Willian Road, Letchworth Garden City, SG6 2AB

Thank you for your consultation on the above site, received on 28 July 2026. We have reviewed the application as submitted and wish to make the following comments.

We advise that there **is not sufficient technical information** to support the application in relation to the wording of Condition 26.

We have concerns that the submitted information does not meet with NPPF, PPG or the LLFA Flood Risk Management Strategy policies and the proposal will either increase the risk of flooding elsewhere or to the proposed development. We provide the following technical review for your consideration.

The main issues include:

- Very low infiltration for permeable pavement design
- Surface water drainage design calculations for the 3.33% AEP event (1:30) and 1% AEP event (1:100) are missing

The LLFA technical review includes:

1. The LLFA still notes that the infiltration rate proposed for the permeable pavement is too low to be considered effective. On a site with such slow-draining ground conditions, the proposed rate would not permit infiltration to function as intended. The applicant is therefore required to provide further justification for the assumed infiltration rate, supported by site-specific testing data, or to revise the drainage strategy to reflect the limitations of infiltration on

this site. It is stated that the actual infiltration rate within the car park is expected to be significantly better than the test results indicate, as the proposed build-up is based on sandy soils. However, no supporting evidence has been provided to substantiate this assumption.

2. Surface water drainage design calculations for the 1% AEP and 3.33% AEP, events should be provided.

Yours sincerely

Raima

Raima Prasad
SuDS and Watercourses Support Officer
Growth and Environment

Annex

The following document has been reviewed, which have been submitted to support the application:

- Post-Planning Drainage Strategy, by Canham Consulting, 22 July 2026, reference: 213692 and Rev:P02.

For reference, Condition 26 wording is as follows:

Condition 26:

"No development shall commence until construction drawings of the final surface water drainage network, associated sustainable drainage components, flow control mechanisms, detailed network calculations and a construction method statement have been submitted and agreed in writing by the Local Planning Authority. The scheme shall then be constructed as per the agreed drawings, Flood Risk Assessment prepared by Canham Consulting Structural Civil Building Engineers reference 213692-CCL-XX-00-01000 Rev P05 S3, dated 24 July 2025 and drawing numbers GCH-CCL-XX-XX-DR-C-0001 Rev P03 dated 24 July 2025 (if infiltration is viable) or 213692-CCL-XX-00-DR-C-1000 Rev P02 dated 24 July 2025 (if infiltration is not viable). The scheme shall address the following matters:

I. Detailed infiltration testing in accordance with BRE Digest 365 (or equivalent) along the length and proposed depth of the proposed infiltration feature(s), as stated within section 6.2.1 of the FRA.

Or, if infiltration is not feasible Surface water runoff rates will be attenuated to 2l/s as stated within section 6.2.1 of the FRA.

II. Provision of surface water attenuation storage, sized and designed to accommodate the volume of water generated in all rainfall events up to and including the critical storm duration for the 3.33% AEP (1 in 30 year) and 1% AEP (1 in 100) rainfall events (both including allowances for climate change).

III. An assessment demonstrating the drainage scheme complies with the National Standards for SuDS July 2025, including provision of the "four pillars" of SuDS.

IV. Detailed designs, modelling calculations and plans of the of the drainage conveyance network in the:

- *3.33% AEP (1 in 30 year) critical rainfall event plus climate change to show no flooding outside the drainage features on any part of the site.*
- *1% AEP (1 in 100 year) critical rainfall plus climate change event to show, if any, the depth, volume and storage location of any flooding outside the drainage features, ensuring that flooding does not occur in any part of a building or any utility plant susceptible to water (e.g. pumping station or electricity substation) within the development. It will also show that no runoff during this event will leave the site uncontrolled.*

- V. *Plans shall be submitted showing the routes for the management of exceedance surface water flow routes that minimise the risk to people and property during rainfall events in excess of 1% AEP (1 in 100) rainfall event plus climate change allowance.*
- VI. *Finished ground floor levels of properties shall be a minimum of 300mm above expected flood levels of all sources of flooding (including any SuDS features and within any proposed drainage scheme) or 150mm above ground level, whichever is the more precautionary.*
- VII. *Details of how all surface water management features to be designed in accordance with The SuDS Manual (CIRIA C753, 2015), including appropriate treatment stages for water quality prior to discharge.*

Reason: To prevent flooding in accordance with National Planning Policy Framework paragraphs 173,175 and 180 by ensuring the satisfactory management of local sources of flooding surface water flow paths, storage and disposal of surface water from the site in a range of rainfall events and ensuring the SuDS proposed operates as designed for the lifetime of the development."