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Lead Local Flood Authority
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Contact Katherine Ashworth
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Date 26 March 2025

Dear Melissa,

RE: 23/00407/FP – Node Court, Drivers End, Codicote, Hitchin, Hertfordshire, SG4 8TR.

Thank you for your consultation on the above site, received on 12 March 2024 for the conversion of Node Court to 8no. dwellings. Conversion of Midden building to residential and the erection of 6no. terraced dwelling-houses and 2no. detached dwelling houses as development to facilitate the restoration of Node Court together with associated car parking, landscaping, boundary treatment and ancillary works. We have reviewed the application as submitted and wish to make the following comments.

We note there is no current surface water outfall from the site and there is no proposed outfall of surface water from the site, as the applicant is proposing to discharge via infiltration using deep bore soakaways.

It may be difficult to discharge to deep bore soakaway due to high groundwater levels (inferred from the close proximity to the watercourse). If the Applicant determines that infiltration is not feasible, the Applicant should resubmit with an outfall to a watercourse.

If the LPA is minded to approve the application, we have provided **conditions to be attached to any consent**. We suggest the following wording.

Condition 1

Prior to or in conjunction with the submission of each reserved matters application, in accordance with the submitted information (Conceptual SuDS Strategy Report prepared by Innervision Design Ltd, REF 01112024, October 2024), detailed designs of a surface water drainage scheme incorporating the following measures shall be submitted to and agreed with the Local Planning Authority. The approved scheme will be implemented prior to the first occupation of the development. 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 at the location of the proposed infiltration feature/s. The applicant should also confirm whether the pond is fed by groundwater in either, or both, seasonally low and seasonally high groundwater periods. Peak groundwater levels must be 1m below any infiltration structure.
 - a. If infiltration is proven to be unfavourable then Greenfield runoff rates for the site shall be agreed with the Lead Local Flood Authority. The post development runoff rates will be attenuated to the equivalent Greenfield rate for all rainfall events up to and including the 1% Annual Exceedance Probability (AEP). The discharge location for surface water runoff will be confirmed to connect with the wider watercourse network.
- 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. Detailed designs, modelling calculations (using FEH) and plans of the of the drainage conveyance network in the:
 - a. 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.
 - b. 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. Half drain down times for any infiltration storage features shall be within 24 hours or designed to store the 1% AEP event plus climate change followed by the 3.33% AEP event
- IV. The design of the infiltration, attenuation and any drainage structures shall include appropriate freeboard allowances. Plans to 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.
- V. Finished ground floor levels of properties are a minimum of 300mm above expected flood levels of all sources of flooding (including the ordinary watercourses, SuDS features and within any proposed drainage scheme) or 150mm above ground level, whichever is the more precautionary.
- VI. 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 with any links to biodiversity net gain proposals. All road and parking runoff must receive robust water treatment prior to discharge to ensure the maintenance of water quality. Please note that we will not accept treatment from solely petrol interceptors for road runoff, and treatment using SuDS

should be provided. Full technical justification should be provided should an alternative approach be presented.

VII. A maintenance and management plan detailing the activities required and details of who will adopt and maintain the all the surface water drainage features for the lifetime of the development.

Reason:

To prevent flooding in accordance with National Planning Policy Framework paragraphs 181,182 and 187 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.

Condition 2

Construction shall not begin until a detailed construction phase surface water management plan for the site has been submitted to and approved in writing by the Local Planning Authority. The scheme shall subsequently be carried out in accordance with the approved details.

Reason: To ensure that the construction of the site does not result in any flooding both on and off site and that all Surface water Drainage features are adequately protected.

Condition 3

The development hereby approved shall not be occupied until details of the maintenance and management of the sustainable drainage scheme have been submitted to and approved in writing by the Local Planning Authority. The drainage scheme shall be implemented prior to the first occupation of the development hereby approved and thereafter managed and maintained in accordance with the approved details in perpetuity. The Local Planning Authority shall be granted access to inspect the sustainable drainage scheme for the lifetime of the development. The details of the scheme to be submitted for approval shall include:

- I. a timetable for its implementation.
- II. details of SuDS feature and connecting drainage structures and maintenance requirement for each aspect including a drawing showing where they are located.
- III. a management and maintenance plan for the lifetime of the development which shall include the arrangements for adoption by any public body or statutory undertaker, or any other arrangements to secure the operation of the sustainable drainage scheme throughout its lifetime. This will include the name and contact details of any appointed management company.

Reason: To ensure that the development achieves a high standard of sustainability and ensure the flood risk is adequately addressed for each new dwelling and not increased in accordance with NPPF and policies NE7, NE8 and NE9 of North Hertfordshire District Council.

Condition 4

Prior to first use of each phase of the development a detailed verification report, (appended with substantiating evidence demonstrating the approved construction details and specifications have been implemented in accordance with the surface water drainage scheme), has been submitted to and approved (in writing) by the Local Planning Authority. The verification report shall include a full set of “as built” drawings plus photographs of excavations (including soil profiles/horizons), any installation of any surface water drainage structures and control mechanisms.

Reason: To ensure that the development achieves a high standard of sustainability and ensure the flood risk is adequately addressed for each new dwelling and not increased in accordance with NPPF and policies NE7, NE8 and NE9 of North Hertfordshire District Council.

Informative to the LPA

The applicant notes the use of the existing pond, at the sites low point, serves to maintain the hydrological connectivity between the site and this pond feature. It is unclear how this is positively connected into the drainage system. Any natural pond water feature should not be used as a SuDS drainage destination outfall.

Both FEH13 and FEH22 are currently accepted to support drainage modelling calculations. For the avoidance of doubt the use of FSR and FEH1999 data has been superseded and therefore, use in rainfall simulations are not accepted.

Please note if, you the Local Planning Authority review the application and decide to grant planning permission, notify the us (the Lead Local Flood Authority), by email at FRMConsultations@hertfordshire.gov.uk.

Yours sincerely,

Katherine

Katherine Ashworth
SuDS and Watercourses Support Officer
Growth and Environment

Annex

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

- Conceptual SuDS Strategy Report prepared by Innervision Design Ltd, ref 01112024 dated October 2024.
- Borehole Soakaway Test prepared by ST Consult Environmental and Geotechnical, Ref MH/JK/EL/JN1937, dated 18 October 2024.
- Site Landscape Plan prepared by DCCLA, dwg no. LP/NCDELCH/020, dated January 2022.
- Design, Access and Planning Statement, prepared by Briffa Phillips Architects, no ref, dated January 2023.
- Existing Site Plan and Block Plan prepared by Briffa Phillips, dwg no. 201, dated 12 October 2018.
- Topographical Survey prepared by Terrain Surveys Ltd, dwg no. TS17-456B\1, dated November 2017.
- Proposed Site Plan prepared by Briffa Phillips, dwg no. 217, dated 12 October 2018.