

Growth & Environment

Peter Bull
Local Planning Authority
North Herts Council
Council Offices
Gernon Road
Letchworth Garden City
Hertfordshire
SG6 3JF

Lead Local Flood Authority
Hertfordshire County Council
Post Point CHN215
Farnham House
Six Hills Way, Stevenage
Hertfordshire SG1 2FQ
www.hertfordshire.gov.uk

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

Your ref: 26/00514/DOC
Date: 1 April 2026

Dear Mr Bull

RE: Details reserved by Condition 3: (Drainage SWMDDS) of planning permission 21/00504/OP granted 3 April 2025 - Land to the East of Talbot Way and Kristiansand Way and Flint Road Allotments Flint Road Letchworth Garden City Hertfordshire SG6 1TY

Thank you for your consultation on the above site, received on 16 March 2026. We have reviewed the application as submitted and wish to make the following comments.

We advise that there **isn't sufficient technical information** to support the application in relation to the wording of Condition 3.

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 LLFA technical review includes;

1. We note that in the approved outline drainage strategy, permeable paving was proposed across much of the site. The drainage strategy submitted with this application does not include any permeable paving and so we would expect justification to be provided on why it has been removed from the design. Even if it is not required for water quality purposes based on the Simple Index method, we still expect all types of SuDS to be explored as much as possible across the site to reduce the requirement for below ground storage and provide water quality, amenity and biodiversity benefits. Check dams could also be implemented if the slopes on the site are prohibitive. We also seek confirmation that the side slopes of the proposed swales will be a minimum of 1 in 3 (1 in 4 or shallower is preferred).

2. We note that in the approved outline drainage strategy, individual rain gardens were proposed on the downpipe of each plot. Although we note that a few indicative locations for bioretention features have been suggested in the latest drainage strategy, commentary should be provided on whether individual plot rain gardens have been considered.
3. Point e) of condition 3 requires finished floor levels to be either 300mm above expected flood levels of all sources of flooding or 150mm above ground level (whichever is more precautionary). Although we note that finished floor levels have been provided on the drainage plan, we require further evidence that these levels align with the wording within condition 3.
4. Point c) requires attenuation features to be able to half drain in 24-48 hours. Evidence should be provided that the basins and tanks proposed meet this criteria.

Yours sincerely

Jake

Jake Silverton
SuDS and Watercourses Support Officer
Growth and Environment

Annex

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

- Report: Drainage Technical Note, Ardent Consulting Engineers, November 2025

For reference, Condition 3 wording is as follows:

Prior to commencement of development, in accordance with the submitted Surface Water Management Drainage Strategy by EPG (Revisions 2.0, January 2023, ref: EPG-9262-DS-01) and additional information prepared by EPG (dated 25th April 2023, ref: EPG-LGC-LTR-04), detailed designs of a surface water drainage scheme, incorporating the following measures shall be submitted to and approved by the Local Planning Authority:

- (a) Detailed infiltration testing in accordance with BRE Digest 365 (or equivalent) OR if infiltration is proven to be unfavourable, then surface water runoff rates will be attenuated and restricted to greenfield rates (no greater than 8l/s) and will discharge to the Anglian Water sewer in Flint Road;*
- (b) Detailed designs, modelling calculations and plans of the drainage conveyance network (including engineering drawings of all SuDS elements) in the:*
 - 50% annual probability critical rainfall event to show no surcharging of the drainage network;*
 - 3.33% annual probability critical rainfall event plus climate change to show no above ground flooding on any part of the site;*
 - 1% annual probability critical rainfall plus climate change event to show, if any, the depth, volume and storage location of any above ground flooding from the drainage network 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.*
- (c) Half drain down times for any infiltration SuDS features to demonstrate that they are able to half drain within 24 hours. Attenuation features should be able to half drain in 24-48 hours.*
- (d) Details of all surface water management features to be designed in accordance with The SuDS Manual (CIRIA C753, 2015 or any subsequent updates), including appropriate treatment stages for water quality prior to discharge.*
- (e) Finished ground floor levels of properties are a minimum of 300mm above expected flood levels of all sources of flooding or 150mm above ground level, whichever is the more precautionary.*

- (f) A plan showing exceedance flow routes within and off site above the 1% AEP (plus climate change) storm event. The approved scheme shall be implemented prior to the first occupation of the development*

Reason: To ensure the flood risk is adequately addressed for each new dwelling and not increased in accordance with NPPF Paragraphs 167 and 169 and Policy NE7 of the North Hertfordshire Local Plan 2011-2031.