

Mr Paul Chaston
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**Lead Local Flood Authority
Growth and Environment
Hertfordshire County Council
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Contact: Flood Risk Management Team
Email: FRMConsultations@hertfordshire.gov.uk

Date 12 March 2025

Dear Mr Chaston

RE: 24/02758/FP - Redevelopment of existing care home and erection of detached 3 to 4 storey 70-bed residential nursing home (Class C2 use) with associated parking, landscaping, amenities and works, following demolition of extensions to existing care home - Guysfield Residential Home, Willian Road, Letchworth Garden City, Hertfordshire, SG6 2AB

Thank you for your consultation on the above site, received on 21 January 2024. We have reviewed the application as submitted and wish to make the following comments.

This is a full application for the redevelopment of existing care home and erection of detached 3 to 4 storey 70-bed residential nursing home (Class C2 use).

We **object** to this planning application in the absence of an acceptable Flood Risk Assessment (FRA) and Drainage Strategy relating to:

- The development is not in accordance with NPPF, PPG or Policy W5: Flood Risk Policy W4: SuDS.

Reason

To prevent flooding in accordance with National Planning Policy Framework paragraphs 181, 182 and 187 by ensuring the satisfactory management of local flood risk, 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.

We will consider reviewing this objection if the following issues are adequately addressed.

1. Further evidence to support the discharge location hierarchy is still needed, since there does not appear to be any watercourse or surface water sewer that could easily be discharged to as per Anglian Water Services asset plan. Location specific BRE365 infiltration testing report required to be submitted, this needs to be within the base of and at the depth of the proposed invert level of any infiltration feature. To be considered as shallow infiltration the invert level of features should be no deeper than 2m below existing ground level.
2. The proposed surface water drainage system does not sufficiently address the four pillars of SuDS. If infiltration is still found to be favourable then water quantity benefit is addressed but further consideration and inclusion for the other three pillars of water quality, biodiversity and amenity benefits needs to be provided.

Once the above points are suitably addressed the LLFA will seek to secure full details in relation to the sustainable management and design of the surface water drainage provision for the proposed development through recommendation of conditions.

Informative

For further advice on what we expect to be contained within the FRA and/ or a Drainage Strategy to support a planning application, please refer to the Validation List and Proforma 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 Flood Risk Management policies on SuDS in Hertfordshire. We do expect the Validation List to be submitted to the Local Planning Authority and LLFA to show you have provided all information and the Proforma to the LLFA to summarise the details of the proposed development.

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

Raima

Raima Prasad
SuDS and Watercourses Support Officer
Growth and Environment

Annex

The following documents have been reviewed.

- Flood risk assessment, by Canham Consulting, 26 June 2024, reference: 213692-CCL-XX-00-01000 and Rev P03.