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Contact: Flood Risk Management Team
Email: FRMConsultations@hertfordshire.gov.uk

Date 1 August 2025

Dear Alex

RE: 25/01196/FP - Erection of two buildings including three units for Flexible Use Classes including Eg (ii) (iii), B2, B8, including servicing, parking, access, landscaping - Starwood House, Avenue One, Letchworth, SG6 2TS

Thank you for your consultation on the above site, received on 16 May 2025. We have reviewed the application as submitted and wish to make the following comments. The planning application is for the erection of two buildings for flexible use classes.

The LLFA has serious concerns over the proposed drainage strategy associated with the development. The proposed drainage strategy is showing significant flooding in the 1% AEP plus climate change rainfall event and flooding occurring in the 3.33% AEP plus climate change rainfall event. The LLFA is also concerned with the existing flood risk at the site.

We **object** to this planning application in the absence of an acceptable Drainage Strategy or / and supporting information relating to:

- The development is at risk of surface water flooding. **We advise that you as Local Planning Authority, ensure that this application passes the sequential test.**
- The proposed SuDS are likely to increase the risk of flooding elsewhere.
- The development is not in accordance with NPPF, PPG or North Herts council local policies including Policy NE8, NE9 and SP12.

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 issues highlighted below are adequately addressed:

- 1) Surface water for climate change shows a large portion of the proposed site is flooded. The surface water shown in the figure shows flooding only for the 30-year and the 100-year return period. The Sequential Test for surface water flooding has not been carried out for the application.
- 2) The current location where the buildings are proposed are already at risk of flooding. A large part of the site is flooded in surface water flooding which will require mitigation. The effectiveness of these mitigation strategies has not been properly assessed in the report.
- 3) The report quotes that “Should exceedance flooding occur, access and egress to the development shall be from the main site access onto Avenue One to the northwest.” However, the flood map shows that Avenue One is also at risk of flooding.
- 4) Infiltration testing is required to understand if it can be utilised within the drainage strategy.
- 5) The proposed drainage strategy cannot flood in the 3.33% AEP plus climate change rainfall event and any flooding in the 1% AEP plus climate change rainfall event must be stored safely on site. The current calculations show flooding occurring in the 3.33% AEP plus climate change rainfall event and it shows 140m³ of flooding occurring in the 1% AEP plus climate change rainfall event. This is a significant amount of flooding and needs to be reduced.
- 6) An updated Drainage strategy with supporting drainage calculations including the complete pipe network to test the network for flooding using FEH rainfall parameters (either FEH13 or FEH22) should be submitted. The calculations should show:
 - a. 50% AEP rainfall event does not surcharge in the drainage network if it is to be adopted by a responsible authority.
 - b. 3.33% AEP rainfall event plus climate change does not flood outside the drainage network which is designed to hold water.
 - c. 1% AEP rainfall event plus climate change does not leave the application boundary or flood any part of a building, utility plant susceptible to water within the development boundary.
- 7) Any flooding occurring in the 1% AEP plus climate change rainfall event must be shown on an associated drawing. This flooding must be stored safely on site.
- 8) The outflow for the design event which is 100-year plus climate change should be limited to the Q_{bar} rate which is 6.2l/s. The current calculation shows an outflow of 22.1l/s. If this cannot be achieved, full justification must be provided.

- 9) Details with regard to the discharge of water to the surface water sewer need to be updated. The current pipe drains to a manhole. The invert level of is not provided at the outfall.
- 10) Any pipe with a diameter of over 225mm is known as oversized. Some of the pipes in the network provided have a diameter of the order of 675mm which are much more than the permissible limit. Also, if the velocity is less than 0.75m/s, the pipes will become silted up (this limiting value is known as the self-cleansing velocity). Ideally it should be above 1 m/s and less than 3m/s. This might lead to associated losses, erosion and deposition.
- 11) Since the half drain time is not provided on the structure there are chances that the structure is not activated during the simulation.
- 12) Details of flood resistance and resilience measures for residual risk. Finished floor levels should be minimum 300mm above any source of flooding (design flood levels including river flooding, surface water flooding or from the drainage scheme) or a minimum of 150mm above any ground level. Whichever is the more precautionary.
- 13) Details regarding the water quality management at site to prevent pollution is not quantified.
- 14) A surface water management and construction phasing plan is required. A high-level assessment of how water quantity and water quality will be managed during the construction phase is required.

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.

Erection of flow control structures or any culverting of an ordinary watercourse requires consent from the appropriate authority, which in this instance is Hertfordshire Lead Local Flood Authority and the Local Council (if they have specific land drainage bylaws). It is advised to discuss proposals for any works at an early stage of proposals.

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

Lisha

Lisha Parambath
SuDS and Watercourses Support Team
Growth and Environment

Annex

The following documents have been reviewed.

- Report: Flood Risk Assessment & Drainage Strategy Report, by Burrow Graham, 25 April 2025, revision number 2.
- Report: Biodiversity Net Gain Assessment, by Aspect Ecology Ltd, 28 April 2025.
- Report: Design & Access Statement, by Wrenbridge, April 2025