

Alex Howard
Local Planning Authority
North Herts Council
PO Box 10613
Borehamwood
WD6 1WA

**Lead Local Flood Authority
Growth and Environment
Hertfordshire County Council
Post Point CHN 215
Farnham House,
Six Hills Way, Stevenage
HERTFORDSHIRE, SG1 2ST
www.hertfordshire.gov.uk**

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

Date 24 December 2024

Dear Alex

RE: 24/01496/FP- Erection of one 3 storey building comprising of 15 dwellings with associated access, landscaping and parking following demolition of the existing dwellings and garages (as amended by information and plans received 23rd September 2024 and 7th November 2024) - 3 to 5 Newells, Letchworth Garden City, Hertfordshire, SG6 2PH

Thank you for your consultation on the above site, received on 28 November 2024. We have reviewed the application as submitted and wish to make the following comments.

We still have concerns over the proposed SuDS Strategy, in that a large area of parking and highway has been discounted from the drainage layout. It is required to show how all areas will be drained for a full planning permission. If the area is subject to S28 Highways application, early conversations should be undertaken as HCC Highways Authority may adopt some SuDS if it can be shown that it is only highway drainage that will be managed by that system.

We **maintain our objection** to this planning application in the absence of an acceptable Flood Risk Assessment (FRA) \& Drainage Strategy relating to:

- The proposed SuDS and Drainage Strategy may increase the flood risk elsewhere.
- The development not complying with NPPF, PPG or local policies: *Policy NE8: Sustainable drainage systems (Reducing Flood Risk), Policy NE9: Water quality and environment, Policy SP12: Green infrastructure, biodiversity and landscape.*

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. All altered drainage and new impermeable areas must be included within the drainage strategy. We advise that the applicant approach the Highway Authority for early discussion on what SuDS may be adopted. We require all designs of the highway area to be submitted.
2. Whilst the supporting drainage calculations indicate that all surface water runoff will be contained within the drainage scheme at the 1% AEP plus 40% climate change. We do request that the appropriate allowance for climate change be added to the 3.33% AEP rainfall scenario also.

Yours sincerely

Raima

Raima Prasad
SuDS and Watercourses Support Officer
Growth and Environment

Annex

The following documents have been reviewed.

- Technical note, by SPD Studio Pvt Ltd, 28 November 2024, REF: MB018 – Newells, Letchworth