

Mr Alex Howard  
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**Lead Local Flood Authority  
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Contact Flood Risk Management Team  
Email [FRMConsultations@hertfordshire.gov.uk](mailto:FRMConsultations@hertfordshire.gov.uk)

Date 3 December 2024

Dear Mr Howard

**RE: 24/01444/FP - Land between Huntsridge and Ashwell House 5 High Street – Ashwell**

Thank you for your consultation on the above site, received on 12 November 2024. We have reviewed the application as submitted and wish to make the following comments.

This is a full planning application for the erection of 14 dwellings (including affordable housing) including creation of access from Ashwell Street, footpath link to Lucas Lane, public open space and soft and hard landscaping, biodiversity enhancement and, associated infrastructure on land north of Ashwell Street, Ashwell.

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

- The development not complying with NPPF, PPG or Policy NE 8.

**Reason**

To prevent flooding in accordance with National Planning Policy Framework paragraphs 173, 175 and 180 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 addressed in **LLFA technical letter (dated 11 November 2024)** are adequately addressed. The main issues are the following:

1. Construction drawings (General Arrangement drawings for the proposed drainage strategy, schedules, standard detail drawings showing drainage proposals, catchment plans) required to be provided.
2. Drainage design hydraulic modelling results performed using the proposed site levels as the cover levels for the proposed drainage system. The hydraulic modelling has been performed assuming the uniform cover levels (100m) for all nodes. This replicates the network on a flat ground offering more storage which is higher than on a sloping ground where storage would be practically lesser.
3. The infiltration testing has not been undertaken at the locations where infiltration is proposed. BRE356 infiltration testing at the location where the infiltration features are proposed is required to be provided.
4. Drainage calculations for events up to and including 1% AEP event plus climate change allowances should be resubmitted with Cv value of 1.
5. For permeable paving with slopes 3% (1:20) or greater, internal terracing or check dams should be incorporated. Since the calculations/modelling is done using a uniform CL of 100m for all the nodes, actual storage in the permeable paving on a sloping ground has not been estimated here.

### **Informative**

The applicant should seek opportunities to include open above ground SuDS and source control features to address amenity, biodiversity and interception within the drainage strategy elements.

The applicant should provide a construction phase surface water management plan prior to commencement of development. This can be conditioned, assuming the applicant is in agreement with pre-commencement conditions, once the outstanding objection points have been adequately addressed.

For further advice on what we expect to be contained within the FRA to support a planning application, please refer to our Developers Guide and Checklist 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 policies on SuDS in Hertfordshire.

In December 2022 it was announced FEH rainfall data has been updated to account for additional long term rainfall statistics and new data. As a consequence, the rainfall statistics used for surface water modelling and drainage design has changed. In some areas there is a reduction in comparison to FEH2013 and some places an increase (see [FEH22 - User Guide \(hydrosolutions.co.uk\)](https://www.hydrosolutions.co.uk/FEH22-User-Guide)). Both FEH 2013 and 2023 are currently accepted. For the avoidance of doubt the use of FSR and FEH1999 data has been superseded and therefore, use in rainfall simulations are not accepted.

The applicant should seek opportunity to include open SuDS and source control to address amenity and biodiversity elements within the drainage strategy elements.

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](mailto:FRMConsultations@hertfordshire.gov.uk).

Yours sincerely

Raima Prasad  
SuDS and Watercourses Support Officer  
Growth and Environment

## **Annex**

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

- 190-FRA-02-A-Flood Risk Assessment-Ashwell, by MAC Pre-Planning Engineering, 6 November 2024 and revision D.