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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 6 June 2025

Dear Andrew

RE: 25/01014/FP - Erection three storey building comprising 35no. retirement living apartments with associated communal areas, landscaping and parking following demolition of existing buildings. Land At Birchwood and Silverdale and Three Trees and Willow Close Old Charlton Road Hitchin Hertfordshire SG5 2AJ

Thank you for your consultation on the above site, received on 14 May 2025. We have reviewed the application as submitted and wish to make the following comments.

This is a Full planning application, and the site development is for 35 dwellings and the applicant would like to submit Drainage Strategy to be approved by the LLFA.

According to the EA flood map, the site is classified as high risk, with a 3.33% annual probability of surface water flooding and flood depths ranging from 200mm to 600mm. Most of the flooding occurs in the southern part of the site.

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

- The development is at risk of surface water flooding.
- The proposed SuDS are likely to increase the risk of flooding elsewhere.
- The development is not in accordance with NPPF, PPG or North Herts District local policies including Policy NE8, Policy NE9 and Policy NE12.

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 on the accompanying Planning Application Technical Response document are adequately addressed.

The main points of this are;

- 1) A detailed Flood Risk Assessment is required to assess the existing surface water flood risk at the site and review how the proposed development will impact this risk. The applicant must also demonstrate how SuDS features will manage the flood risk in the southern part of the site.
- 2) No evidence has been provided confirming consent from Anglian Water. The consent letter must specifically address the discharge of surface water from the site into their asset.
- 3) The application should demonstrate water quality and biodiversity benefits for the SuDS features in accordance with CIRIA SuDS guidelines.
- 4) Applicants must ensure a minimum of 150mm above external ground levels and demonstrate that surfaces are sloped away from vulnerable areas, such as doorways.
- 5) A drawing must illustrate the exceedance of the design 1% AEP rainfall event plus climate change (or drainage network failure), demonstrating how impacts on people and property are minimized. This drawing should include proposed external ground levels, finished floor levels, and any designed slopes on impermeable surfaces like highways or car parks.
- 6) The applicant must provide high level assessment of how water quantity and water quality will be managed during the construction phase.

Informative:

- 7) The applicant has not confirmed whether it is a phased development. If it is a phased development, then the applicant must submit a surface water management and construction phase plan for the same.
- 8) An Anglian Water asset map has been provided, and the existing utility survey data indicates the presence of existing networks. However, no information has been given regarding whether these networks will be removed or retained.
- 9) Only limited information has been provided on rainwater reuse. The applicant must explain why it cannot be incorporated.

Yours sincerely

Veeranna

BHUKYA VEERANNA
SuDS and Watercourses Support Officer
Growth and Environment

Annex

The following documents have been reviewed.

- **Report:** Drainage Strategy Report including Wastewater Strategy by Infrastructure Design Limited dated 28 March 2025 with reference IDL/1275/DS/001 and revision number P01.