



INFRASTRUCTURE DESIGN LTD

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Our Ref: IDL-1275-LLFA-01

Your Ref: IDL

25th November 2025

Hertfordshire County Council SuDS Team
FAO Lead Local Flood Authority

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

We write in response to the Lead Local Flood Authority's holding objection letter regarding full application for the above scheme.

Our responses are noted below the concerns raised in italics.

LLFA Comment no: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.

IDL Response

Please refer to Amazi's full flood risk assessment.

This confirms the following:

- The proposed development comprises the construction of a three-storey building containing 35 units. Retirement living apartments with associated communal areas, landscaping and parking following demolition of existing buildings.
- The site is in flood zone 1, at low risk of flooding from significant watercourses.
- The south of the site is shown to be at risk of flooding from surface water. The proposed building has been designed to mitigate these risks, and the minimum finished floor level is 0.5 m above the estimated design flood level.
- The proposed development is raised above the areas at risk of flooding.
- There is a risk of flooding near the site, so the owners/occupiers should be aware of local flood risks and prepare accordingly.

LLFA Comment no: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.

IDL Response

We acknowledge Anglian Water's objection regarding incomplete surface water hierarchy evidence and discharge rates. Please note that the drainage strategy report already addresses these points in detail:

- **Infiltration Feasibility:**

Crossfield Consulting conducted soakaway drainage testing in May 2024. The results confirm that the site mainly consists of fine-grained strata with low permeability and a high proportion of fines within sand and gravel horizons. Additionally, shallow groundwater was encountered at approximately 3.5–4.0 m depth. A falling head test further verified low-permeability conditions.

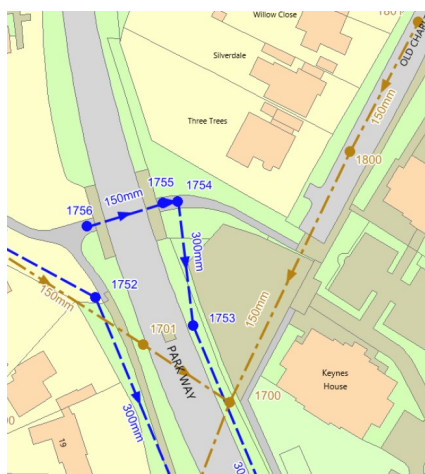
Conclusion: Soakaway drainage is not feasible.

- **Alternative Drainage Strategy:**

Given the infiltration constraints and the absence of a nearby watercourse, the most viable option is to discharge surface water runoff into the Anglian Water sewer at greenfield runoff rates. The proposed connection point is Anglian Water manhole 1754, which runs southwards from the site.

Please refer to the Anglian Water asset map in Appendix B of the revised drainage strategy report, and below is an extract of the sewer location.

We trust this clarifies the rationale behind the proposed strategy. If further evidence or engagement with Anglian Water is required to resolve their objection, we are happy to assist.



LLFA Comment no:3

The application should demonstrate water quality and biodiversity benefits for the SuDS features in accordance with CIRIA SuDS guidelines.

IDL Response

Due to limited space within the development boundary, above-ground SuDS features such as wetland ponds, rain gardens, green roofs, and swales cannot be included. Furthermore, given the age and potential fragility of the development's end users, open SuDS features near amenity routes should be avoided for safety reasons.

To ensure compliance and minimise potential pollution to the final surface water outfall, the following SuDS features are included in the proposal:

- Porous paving
- Cellular storage systems
- Structural tree pits-This has been shown in the New Leaf Landscaping proposal.

These measures provide water quality benefits and align with CIRIA SuDS guidance while respecting site constraints and user safety.

LLFA Comment no: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.

IDL Response

As stated in response 1, the building has been designed to mitigate flood risks, and the minimum finished floor level is 0.5 m above the estimated design flood level.

LLFA Comment no: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

IDL Response

Please note the following key points regarding flood resilience and exceedance flow management:

- **Finished Floor Levels (FFL):**
All proposed finished floor levels are set at least 500 mm above external ground levels. This ensures robust protection against potential flooding.
- **Exceedance Flow Routing:**
Proposed site levels have been designed so that any exceedance flows, including those from off-site influences, are directed away from the new dwellings. For details, please refer to the drainage plan in Appendix D of the Drainage Strategy Report and the proposed levels are shown in the New Leaf landscaping plan (LSE-2983-03-LA-MCS791-Drg 01 P3 Landscape Proposals).
- **System Capacity and Climate Change Allowance:**
The proposed drainage system is designed to accommodate surface water runoff from the development for a 1 in 100-year (1% AEP) storm event, plus a 40% climate change allowance. Hydraulic checks confirm no flooding within the system for all critical storm events.

- **Residual Risk Management:**
In the unlikely event of drainage failure or storms exceeding the design standard, site levels ensure that any resulting floodwater—whether from on-site or off-site sources—is safely routed away from buildings.

LLFA Comment no:6

The applicant must provide a high-level assessment of how water quantity and quality will be managed during construction.

IDL Response

A Surface Water Management Plan has been prepared to ensure that the appointed contractor manages surface water runoff effectively during the construction phase. This plan addresses both water quantity and quality, ensuring that runoff is not compromised and that appropriate measures are in place to prevent pollution and maintain compliance with best-practice standards.

Please would you kindly review the above responses and offer your support for the scheme.

If you have any queries or require further information, please do not hesitate to contact us.

Yours faithfully,



Brijesh Mistry

For and on behalf of **Infrastructure Design Ltd**

Enc: – Revised Drainage Strategy Report Rev P02, SWMP report & copy of New Leaf Landscaping proposal, which includes the proposed levels.