

Anne McDonald
Local Planning Authority
North Herts Council
Council Offices
Gernon Road
Letchworth Garden City
Hertfordshire
SG6 3JF

Lead Local Flood Authority
Post Point CHN 215
Hertfordshire County Council
County Hall, Pegs Lane
HERTFORD SG13 8DN
www.hertfordshire.gov.uk

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

Date 18 October 2024

Dear Anne

RE: 24/01426/FP - Demolition and redevelopment to provide 44 residential apartments, including 325 sqms of Class E floorspace at ground floor fronting the High Street, landscaping, amenity and associated parking at 9-10 High Street - Hitchin, Hertfordshire, SG5 1BH

Thank you for your consultation on the above site, received on 16 July 2024. We have reviewed the application as submitted and wish to make the following comments.

As this is a full planning application, the concern here is that the detailed design has not been completed yet for the proposed drainage strategy. Moreover, there is a serious concern with the hydraulic modelling results provided in the Flood Risk Assessment report.

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

- The proposed SuDS are likely to increase the risk of flooding elsewhere.
- The development not complying with NPPF, PPG or Policy NE 8 of North Herts Local Plan.

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 following issues are adequately addressed.

1. We require further information to show how any surface water runoff will not enter the building basement via the vehicle access ramp. This will include any flooding from the drainage scheme but also to minimise impacts during drainage failure or an exceedance event beyond the design flood. This would include how the basement area can remove any flood water in this scenario as the back of the retail unit would flood from the basement car parking behind. Or how to manage a depth of flood water that could build up in the basement.
2. A detailed proposed surface water drainage strategy drawing should be provided with corresponding pipe network labelling and outfall details. This must include all elements of the drainage scheme including conveyance and storage.
3. No evidence on the outlet connections from the blue roofs to attenuation tank is provided.
4. Drainage modelling results, design checklist, and half drain time for the proposed attenuation tank (to meet the 48-hour requirement for the 1% AEP plus climate change design event)
5. The angle between the proposed 150mm diameter pipe and existing 225mm diameter outgoing pipe from Anglian Water SWMH 4151 is less than 90 degrees (Design and Construction Guidance for foul and surface water sewers offered for adoption under the Code for adoption agreements for water and sewerage companies operating wholly or mainly in England ("the Code")). Further clarification required to ensure that the proposed drainage scheme does not require significant amendment.

We also request further clarification or comment on the following:

1. There is predicted to be a surface water flow path to the south and to the east of the site. We request that the finished floor levels are at least 300mm above the 0.1% AEP extent (i.e. A proxy for the 1% plus 40% climate change extent) and at least 150mm above any external ground level (at the back of the building or at the front), whichever is the more precautionary. This will provide flood resistance and resilience to the building including access points for the dwellings at ground level.
2. It is not clear from the report or the design why multi beneficial source control SuDS features have been excluded such as raingardens or green roofs. To meet the four pillars of SuDS multi-beneficial features should be included unless there is substantive evidence as to why they are inappropriate.

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 Profroma 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.

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

Shivam Bhadouria
SuDS and Watercourses Support Officer
Growth and Environment

Annex

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

- Sustainable Drainage Systems (SuDS) Strategy Assessment and Report, by Price & Myers, May 2024 and revision 2.
- Application Form Redacted, PowerHaus Consultancy
- 9-10 High Street Hitchin Sustainability Statement, June 2024, Issue No. 2