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**Lead Local Flood Authority
Growth and Environment
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Contact Flood Risk Management Team
Email FRMConsultations@hertfordshire.gov.uk

Date 21 November 2024

Dear Alex

RE: 24/01496/FP - 3 - 5 Newells Letchworth Garden City Hertfordshire SG6 2PH

Thank you for your consultation on the above site, received on 25 September 2024. We have reviewed the application as submitted and wish to make the following comments.

This is a full application for the erection of one 3 storey building comprising of 15 dwellings with associated access, landscaping and parking following demolition of the existing dwellings and garages.

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

- 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 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 the technical letter (dated 13 August 2024) are adequately addressed. This includes:

1. FEH rainfall data should be used for surface water simulation calculations submitted, FSR data is not acceptable and a Cv value of 1 should be used for all the calculations. The current Parameters used underestimate the volume of water that impacts the site and therefore the volume of storage required.
2. Only 780m² has been included within the hydraulic model where the FRA states 1500m² of impermeable area will be included within the proposed development and discharged at 1 l/s. It appears the new car parking areas separate from the main site, have been excluded from the drainage design. These areas need to be incorporated and the proposed discharge rate of 1 l/s for the whole development site not exceeded. The model should include the full network of the proposed drainage scheme.
3. It is not clear from the report or the design why multi-beneficial source control SuDS features have been excluded such as raingardens and enhanced tree pits. 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 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.

Erection of flow control structures or any culverting of an ordinary watercourse requires consent from the appropriate authority, which in this instance is Hertfordshire Lead Local Flood Authority and the Local Council (if they have specific land drainage bylaws). It is advised to discuss proposals for any works at an early stage of proposals.

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.

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

Raima

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;

- Flood risk statement, by SPDSTUDIO, 6 September 2024 and Revision no.01.