



Environment Agency - Hertfordshire & North London
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St Albans Road West
HATFIELD
AL10 9EX

For the attention of Becki Ingram, Planning Specialist

Our Ref: QUK-JBAU-XX-XX-LT-HM-0001.docx

13 November 2025

Dear Becki,

12th November EA meeting - The Foundry - ENVPAC/1/HNL/00647 – Discharge of Planning Condition 25

Thank you for allowing us to share our views on your response dated 14th October 2025 with you and your colleagues, Louise Foreman and Chris Padley-Knight, during our 12th November 2025 meeting.

As discussed at the beginning of the meeting, we understand that the only outstanding point of objection preventing the Environment Agency to recommend the discharge of Condition 25 can be summarised as follows:

Matter 1: An assessment of the impact of the increase in flood depths within plots 2 and 3 on the safety of the development. This should include an assessment of whether the finished floor levels of these plots are raised high enough to ensure there is no risk of internal flooding during the design flood event and whether/how safe access and escape is available.

Matter 2: A table showing the difference in modelled flood levels between the baseline and post-development model scenarios for model nodes outside the red line boundary, both upstream and downstream of the site. This is required to clearly demonstrate there will be no significant increase in flood risk elsewhere.

Matter 3: An explanation of why it has not been possible to provide level-for level floodplain storage within the top 200mm level band.

(extract from DLA's meeting agenda)

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Matter 1

As re-iterated during the meeting, flood mechanisms at the site are similar to those observed within a flood storage area, whereby the lack of capacity of the culvert crossing Brookend Lane forces flood water (generated by the exceedance flows) to build-up on site until it is able to overtop and flow over Brookend Lane. As a result, the design flood level at the site is dictated by the elevation of Brookend Lane (and, to a lesser extent, the capacity of the culvert crossing Brookend Lane) and thus submerged features on site (like the new access road) or the excavation levels on site have no noticeable impact to the design flood level. As a result, there is no direct correlation between:

1. The 'increases in flood depths' observed within the property back gardens and underneath the floor slab and decks of Plots 2 and 3, and;
2. The design flood level (which is regulated by the elevation of Brookend Lane).

This point is also confirmed by Table 3-1 of JBA's Technical Note dated 22 September 2025 which shows no noticeable difference with the design flood level documented in Table 4-1 of JBA's FRA report dated February 2023 (which supported the grant of planning permission), as per the extracts below.

Extract from 22/09/2025 Technical Note				Extract from Feb 2023 FRA report			
Table 3-1: Modelled flood levels (2025 modelling study)				Table 4-1: Post-development flood levels			
Node label	Flood levels (m AOD) for the following events			Node label	Flood levels (m AOD) for the following events		
	20-year	100-year	100-year with (+19%) climate change		20-year	100-year	100-year with (+19%) climate change
IPBR_0470	70.86	70.92	70.95	IPBR_0525	70.88	70.94	70.97
IPBR_0439	70.86	70.92	70.94	IPBR_0501	70.87	70.93	70.96
IPBR_0408	70.86	70.92	70.94	IPBR_0470	70.86	70.93	70.95
IPBR_0377	70.85	70.91	70.93	IPBR_0439	70.86	70.92	70.95
				IPBR_0408	70.86	70.92	70.94
				IPBR_0377	70.85	70.91	70.93

A review of the as-build drawing produced by Jarvis (enclosed), shows that the threshold level of Plots 2 and 3 (i.e. 71.55 as per the recommendations made in the approved FRA report) is still 600mm above the design flood level of 70.94m AOD.

As a result, whilst it is accepted that the additional excavation carried out on site to provide extra flood storage volumes and the lowering of the void base level have led to an increase in flood depths within the floodable parts of the site, these alterations to the site topography do not affect the

design flood level on site nor lead to an increase in internal flooding to Plots 2 and 3.

Matter 2

As per your request, please find below an updated version of Table 3-1 from the 22nd September 2025 JBA Technical Note.

Node label*	Flood levels** (m AOD) for the following events		
	20-year	100-year	100-year with (+19%) climate change
IPBR_0501	70.87 70.87	70.93 70.93	70.96 70.96
IPBR_0470	70.86 70.86	70.92 70.92	70.95 70.95
IPBR_0439	70.86 70.86	70.92 70.92	70.94 70.94
IPBR_0408	70.86 70.86	70.92 70.92	70.94 70.94
IPBR_0377	70.85 70.86	70.91 70.91	70.93 70.93
IPBR_0363	70.57 70.57	70.60 70.60	70.61 70.61
* Refer to Error! Reference source not found. in JBA's Technical Note for node locations ** Black values = post-dev flood levels / red values = baseline flood levels Full model results are available from the csv model results files			

Given the lack of flood defence in the study area, this table confirms the correlation between increases (or thereby lack of) in flood depths 'outside of the channel' and 'within the channel' and supports results from the updated flood risk impact analysis documented in the 22nd September JAB Technical Note.

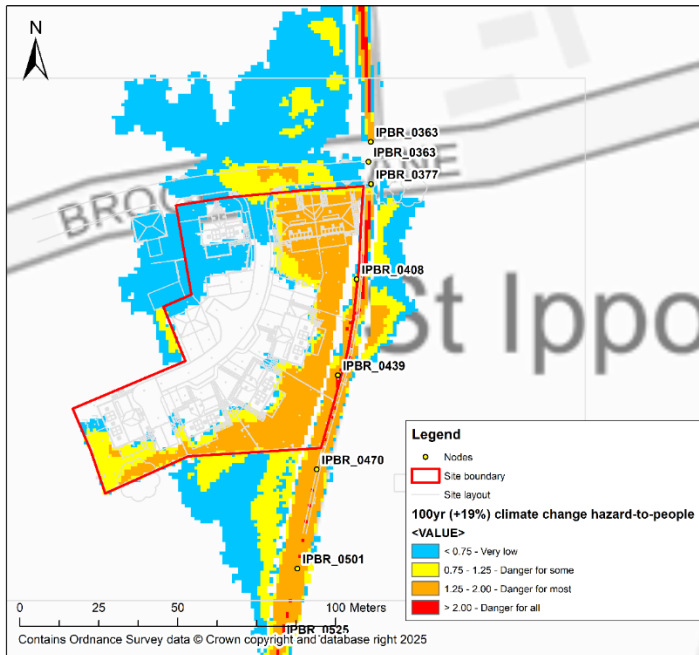
Matter 3

Please find enclosed the letter issued to the Environment Agency which summarises why level-for-level for the upper 200mm band cannot be provided. It should be noted that this point was accepted by your colleagues (and summarised in their letter dated 28th November 2024) prior to the discharge of Condition 17.

Additional Matter

In addition to the above matters, you requested information concerning safe access and egress procedures on site. To alleviate your concerns, we have enclosed a copy of the Flood Response Plan (which has been

issued and validated by the Local Flood Emergency Planning team earlier this year) and produced an updated hazard-to-people map (below) to confirm the latest changes to the site topography have not lead to significant changes in the hazard-to-people categories used to produce the Flood Response Plan.



We trust the above clarifies how alterations made to the site topography have not led to material changes in flood risk, flood resistance or flood emergency procedures at the site and look forward to receiving confirmation of your revised position concerning the discharge of Condition 25.

Meanwhile, feel free to contact me if you have any queries.

Yours sincerely,

[Redacted signature]

Olivier Saillofest

For and on behalf of Jeremy Benn Associates Limited

Technical Director

[Redacted contact information]

Encs. Flood Response Plan, As-build drawing showing property threshold levels, Letter to EA dated 13 November 2024, Letter from EA dated 28 November 2024.