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Contact: Flood Risk Management Team
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Date 11 November 2025

Dear Mr Chaston

RE: 24/02758/FP - Redevelopment of existing care home and erection of detached 3 to 4 storey 70-bed residential nursing home (Class C2 use) with associated parking, landscaping, amenities and works, following demolition of extensions to existing care home - Guysfield Residential Home, Willian Road, Letchworth Garden City, Hertfordshire, SG6 2AB

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

This is a full application for the redevelopment of existing care home and erection of detached 3 to 4 storey 70-bed residential nursing home (Class C2 use).

We previously objected to this application as the discharge hierarchy had not been fully explored. Anglian Water have also objected to the application in the absence of infiltration testing.

As it may not be feasible to undertake further infiltration testing at this stage, and the need for testing to be undertaken over wetter months to record a worst-case scenario, we would recommend the following conditions if the application is approved.

Condition 1: Prior to the commencement of development, construction drawings of the final surface water drainage network, associated sustainable drainage components, flow control mechanisms, detailed network calculations and a construction method statement shall be submitted and agreed in writing by the Local Planning Authority. The scheme shall then be constructed as per the agreed drawings, Flood Risk Assessment prepared by Canham Consulting Structural Civil Building Engineers reference 213692-CCL-XX-00-01000 Rev P05 S3, dated 24 July 2025 and drawing numbers GCH-CCL-XX-XX-DR-C-0001 Rev P03 dated 24 July 2025 (if infiltration is viable) or 213692-CCL-XX-00-DR-C-

1000 Rev P02 dated 24 July 2025 (if infiltration is not viable). The scheme shall address the following matters:

- I. Detailed infiltration testing in accordance with BRE Digest 365 (or equivalent) along the length and proposed depth of the proposed infiltration feature(s), as stated within section 6.2.1 of the FRA.

Or, if infiltration is not feasible

Surface water runoff rates will be attenuated to 2l/s as stated within section 6.2.1 of the FRA.

- II. Provision of surface water attenuation storage, sized and designed to accommodate the volume of water generated in all rainfall events up to and including the critical storm duration for the 3.33% AEP (1 in 30 year) and 1% AEP (1 in 100) rainfall events (both including allowances for climate change).
- III. An assessment demonstrating the drainage scheme complies with the National Standards for SuDS July 2025, including provision of the “four pillars” of SuDS.
- IV. Detailed designs, modelling calculations and plans of the of the drainage conveyance network in the:
 - 3.33% AEP (1 in 30 year) critical rainfall event plus climate change to show no flooding outside the drainage features on any part of the site.
 - 1% AEP (1 in 100 year) critical rainfall plus climate change event to show, if any, the depth, volume and storage location of any flooding outside the drainage features, ensuring that flooding does not occur in any part of a building or any utility plant susceptible to water (e.g. pumping station or electricity substation) within the development. It will also show that no runoff during this event will leave the site uncontrolled.
- V. Plans shall be submitted showing the routes for the management of exceedance surface water flow routes that minimise the risk to people and property during rainfall events in excess of 1% AEP (1 in 100) rainfall event plus climate change allowance.
- VI. Finished ground floor levels of properties shall be a minimum of 300mm above expected flood levels of all sources of flooding (including any SuDS features and within any proposed drainage scheme) or 150mm above ground level, whichever is the more precautionary.
- VII. Details of how all surface water management features to be designed in accordance with The SuDS Manual (CIRIA C753, 2015), including appropriate treatment stages for water quality prior to discharge.

Reason:

To prevent flooding in accordance with National Planning Policy Framework paragraphs 173, 175 and 180 by ensuring the satisfactory management of local sources of flooding 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.

Condition 2

The development hereby approved shall not be occupied until details of the maintenance and management of the sustainable drainage scheme have been submitted to and approved in writing by the Local Planning Authority. The drainage scheme shall be implemented prior to the first occupation of the development hereby approved and thereafter managed and maintained in accordance with the approved details in perpetuity. The Local Planning Authority shall be granted access to inspect the sustainable drainage scheme for the lifetime of the development. The details of the scheme to be submitted for approval shall include:

- I. a timetable for its implementation.
- II. details of SuDS feature and connecting drainage structures and maintenance requirement for each aspect including a drawing showing where they are located.
- III. a management and maintenance plan for the lifetime of the development which shall include the arrangements for adoption by any public body or statutory undertaker, or any other arrangements to secure the operation of the sustainable drainage scheme throughout its lifetime. This will include the name and contact details of any appointed management company.

Reason: To ensure that the development achieves a high standard of sustainability and ensure the flood risk is adequately addressed for each new dwelling and not increased in accordance with NPPF and Policies of North Hertfordshire District Council.

Condition 3

Development shall not commence until details and a method statement for interim and temporary drainage measures during the demolition and construction phases have been submitted to and approved in writing by the Local Planning Authority. This information shall provide full details of who will be responsible for maintaining such temporary systems and demonstrate how the site will be drained to ensure there is no increase in the off-site flows, nor any pollution, debris and sediment to any receiving watercourse or sewer system. The site works and construction phase shall thereafter be carried out in accordance with approved method statement, unless alternative measures have been subsequently approved by the Planning Authority

Reason:

To prevent flooding and pollution offsite in accordance with the NPPF.

Condition 4

Upon completion of the surface water drainage system, including any SuDS features, and prior to the first use of the development; a survey and verification report from an independent surveyor shall be submitted to and approved in writing by the Local Planning Authority. The survey and report shall demonstrate that the surface water drainage system has been constructed in accordance with the details approved pursuant to condition [1]. Where necessary, details of corrective works to be carried out along with a timetable for their completion, shall be included for approval in writing by the Local Planning Authority. Any corrective works required shall be carried out in accordance with the approved timetable and subsequently re-surveyed with the findings submitted to and approved in writing by the Local Planning Authority.

Reason:

To ensure the flood risk is adequately addressed, not increased and users remain safe for the lifetime of the development in accordance with NPPF and Policies of North Hertfordshire District Council.

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 Proforma 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.

Yours sincerely

Flood Risk Management
Growth and Environment

Annex

The following document has been reviewed:

- Flood risk assessment, by Canham Consulting, 21 May 2025, reference: 213692-CCL-XX-00-01000 and Rev P04.