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ADDENDUM REPORT TO ADDRESS LEAD LOCAL FLOOD AUTHORITY COMMENTS

Date: 18th December 2025

File Ref: GB/VL/P25-3474/02TN

Subject: Response to Lead Local Flood Authority Comments for the Proposed Development at Land south Of Turnpike Lane, Ickleford

1.0 INTRODUCTION

- 1.1 This Technical Note provides a formal response to the Lead Local Flood Authority (LLFA) queries via their letter (Appendix A) dated 2nd December 2025.
- 1.2 The Technical Response document provides details regarding flooding and drainage concerns for the proposed development at Land South of Turnpike Lane, Ickleford Hertfordshire SG5 3XB (Ref: 25/02401/OP)

2.0 RESPONSE TO COMMENTS

LLFA Comment:

"The applicant is required to ensure that the finished floor level is elevated at least 300mm above the design flood level, in consideration of the 300mm flood depth identified at the proposed attenuation basin under a 3.33% Annual Exceedance Probability (AEP) event."

- 2.1 We assume the LLFA are referring to surface water flood risk rather than fluvial or any other source of flood risk. As shown on the attached drawing, the proposed built development is not located within any surface water flood zone.

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- 2.2 The Flood Risk Assessment (FRA) does identify localised surface water flooding to the north of the attenuation basin; however, this is not part of a flow route, but rather a pooling of water within a localised depression (see Section 4.11 for further clarification).
- 2.3 As the proposed built development is not situated in an area shown to be at risk of surface water flooding, the finished floor levels (FFLs) do not need to be raised.

LLFA Comment:

"The applicant is required to submit a drawing that includes ground levels and clearly delineates the above-ground flood extent and depth associated with a 1% Annual Exceedance Probability (AEP) event, inclusive of climate change considerations".

- 2.4 As per the previous comment, we assume the LLFA is referring to surface water (SW) flooding rather than fluvial flood risk. The LLFA should be aware that this is an outline application, and therefore the requested level of detail is not required at this stage and will be provided at reserved matters stage or dealt with via an appropriately worded planning condition.
- 2.5 Ground levels are provided on the topographic survey, which is included within the Surface Water Drainage Strategy. The 1% AEP surface water flood extent is shown in Figure 4.3 of the FRA, which clearly demonstrates that the proposed built development is located away from any identified flood risk. Even during the predicted 1% AEP surface water flood event, inclusive of climate change, there is no flood depth recorded on the site.

LLFA Comment:

"The applicant is required to submit cross-sectional layouts and specifications of the proposed storage structures and attenuation basin".

- 2.6 As this is an outline application, this level of detail is not required at this stage and can be provided at reserved matters stage or secured through an appropriately worded planning condition if necessary. The submitted FRA and SuDS Strategy include a designed freeboard for the attenuation basin.

LLFA Comment:

"The drainage strategy drawing lacks clear labelling and does not correspond with the presentation format used in the drainage calculations".

- 2.7 We are unclear about this statement, as a drainage drawing was submitted containing all necessary key details and required labelling. Any additional information is provided within the submitted FRA report and FLOW calculations. Notwithstanding this, we believe the drawings provided contained all necessary key details and required labelling; however, we would

welcome specific comments from the LLFA on what they deem to be missing, and we can provide the same.

LLFA Comment:

"A portion of the site's surface water is proposed to be pumped to the nearest existing storm sewer manhole located on the eastern side of the site. Consent must be obtained from the relevant authority for this discharge, and documentation of the agreed discharge rate must be submitted as part of the application. Discharging surface water via a pumped arrangement is allowable by exception only and must be supported by an assessment of the risk of pump failure".

- 2.8 We are unclear about the LLFA's comment, as all surface water from the Site ultimately discharges to a watercourse located directly south of the Site boundary and not to an adopted sewer. In accordance with the drainage hierarchy, surface water from the Site is therefore proposed to discharge to this watercourse.
- 2.9 The majority of the Site's drainage network will operate via gravity flow to the attenuation basin, with only a small catchment requiring a pumped solution due to site level constraints, as a gravity connection is not achievable for this area. The pumped discharge will connect into a new surface water sewer network installed as part of the development, which will then flow into an existing 150 mm private surface water sewer located on site prior to discharging to the watercourse.
- 2.10 The drainage model demonstrates that the existing 150 mm surface water sewer has sufficient capacity and does not require upgrading, other than the provision of a new connection manhole. The applicant has the legal right to discharge into this private sewer and can provide legal confirmation if required. The use of pumping has been kept to a minimum, and a pump failure assessment (FRA Section 5.28) demonstrates that the storage crates can fully contain a 1 in 30-year event, with no flooding predicted.

LLFA Comment:

"A high-level assessment should be provided outlining the proposed measures for managing both water quality and water quantity throughout the construction phase. This should include strategies to mitigate sedimentation, control runoff, prevent pollution, and ensure compliance with relevant environmental standards. This detail can be secured under condition.

The applicant has not confirmed whether the proposed development will be delivered in phases. If appropriate, a Construction Phase Surface Water Management Plan should be submitted to address surface water control measures during each stage of construction".

- 2.11 At this outline planning stage, we are only required to assess the *post-planning* (operational) situation, not the construction phase. Accordingly, it is not a requirement to provide

construction-phase water quantity or water quality plans. If the LLFA require evidence of how surface water will be managed during construction, we would welcome an appropriate planning condition. The phasing of the development will be confirmed at the detailed design stage, and a Construction Phase Surface Water Management Plan, appended to the CEMP, will be prepared and submitted as required.

LLFA Comment:

The applicant has indicated an intention to incorporate rainwater harvesting; however, the specific type of rainwater features proposed have not been clearly defined. Furthermore, no supporting documentation has been provided to demonstrate how the harvested rainwater will be reused.

2.12 The FRA confirms that additional SuDS measures, including rainwater harvesting, will be incorporated into the scheme to irrigate landscaped and bioretention areas. These features have been excluded from the design calculations, as it is assumed that the rainwater harvesting devices would be at capacity during a storm event. This approach ensures that the proposed design can fully contain the 1% AEP + climate change (CC) event on site, even when the rainwater harvesting devices are full.

2.13 As this is an outline application, full details of the proposed rainwater harvesting measures will be determined and incorporated at the detailed design stage.

LLFA Comment:

The applicant has not accounted for urban creep within the hydraulic calculations, and no allowance for its potential impact has been identified.

2.14 Urban creep (10%) has been included within the hydraulic calculations, and its potential impact has been accounted for in the proposed design.

3.0 SUMMARY

3.1 This technical note responds to the LLFA comments from the 12th of December 2025 for the proposed development located at Land South of Turnpike Lane, Ickleford Hertfordshire SG5 3XB (Ref: 25/02401/OP).

3.2 We hope the provided information in this technical note is sufficient to remove the objections raised or have any residual concerns reflected within an appropriate planning condition, regarding detailed drainage design work.

Written by: Grace Beard MSc BSc (Hons), MCIWEM

Approved by: Claire Burroughs, MSc DIC, MEng (Hons), MCIWEM

Appendices:

Appendix A – LLFA Objection Letter

Appendix B – Surface Water Extent with masterplan and drainage strategy.

APPENDICES

APPENDIX A

LLFA Objection Letter

Growth & Environment

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

Lead Local Flood Authority
Hertfordshire County Council
Post Point CHN215
Farnham House
Six Hills Way, Stevenage
Hertfordshire SG1 2FQ
www.hertfordshire.gov.uk

Contact: SuDS and Watercourses Team
FRMConsultations@hertfordshire.gov.uk

Your ref: 25/02401/OP
Date: 2 December 2025

Dear Paul,

RE: 25/02401/OP - Outline planning application for residential development with means of access from Turnpike Lane for consideration and all other matters reserved for subsequent approval; demolition of all existing structures; associated landscaping, drainage, car parking; infrastructure and all ancillary and enabling works - Land South of Turnpike Lane, Ickleford Hertfordshire SG5 3XB

Thank you for your consultation on the above site, received on 3 October 2025. We have reviewed the application as submitted and wish to make the following comments.

This is an Outline planning application with all matters reserved except means of access and the applicant would like to develop a residential development of up to 100 dwellings with access from Turnpike Lane including associated landscaping, drainage, car parking following demolition of all existing structures within the area of 6.98 hectares.

We **object** to this planning application in the absence of an acceptable or / and Drainage Strategy or / and supporting information relating to:

- The proposed SuDS are likely to increase the risk of flooding within the site and elsewhere.
- The development is not in accordance with NPPF, PPG or North Herts local policies including Policy NE8 and Policy NE9.

Reason

To prevent flooding in accordance with National Planning Policy Framework paragraphs 181, 182 and 187 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 highlighted below are adequately addressed:

- 1) The applicant is required to ensure that the finished floor level is elevated at least 300mm above the design flood level, in consideration of the 300mm flood depth identified at the proposed attenuation basin under a 3.33% Annual Exceedance Probability (AEP) event.
- 2) The applicant is required to submit a drawing that includes ground levels and clearly delineates the above-ground flood extent and depth associated with a 1% Annual Exceedance Probability (AEP) event, inclusive of climate change considerations.
- 3) The applicant is required to submit cross-sectional layouts and specifications of the proposed storage structures and attenuation basin.
- 4) The drainage strategy drawing lacks clear labelling and does not correspond with the presentation format used in the drainage calculations.
- 5) A portion of the site's surface water is proposed to be pumped to the nearest existing storm sewer manhole located on the eastern side of the site. Consent must be obtained from the relevant authority for this discharge, and documentation of the agreed discharge rate must be submitted as part of the application. Discharging surface water via a pumped arrangement is allowable by exception only and must be supported by an assessment of the risk of pump failure.
- 6) A high-level assessment should be provided outlining the proposed measures for managing both water quality and water quantity throughout the construction phase. This should include strategies to mitigate sedimentation, control runoff, prevent pollution, and ensure compliance with relevant environmental standards. This detail can be secured under condition.

Informative

- 1) The applicant has indicated an intention to incorporate rainwater harvesting; however, the specific type of rainwater features proposed have not been clearly defined. Furthermore, no supporting documentation has been provided to demonstrate how the harvested rainwater will be reused.
- 2) The applicant has not accounted for urban creep within the hydraulic calculations, and no allowance for its potential impact has been identified.
- 3) The applicant has not confirmed whether the proposed development will be delivered in phases. If appropriate, a Construction Phase Surface Water Management Plan should be submitted to address surface water control measures during each stage of construction.

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.

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

Veeranna

BHUKYA VEERANNA
SuDS and Watercourses Support Officer
Growth and Environment

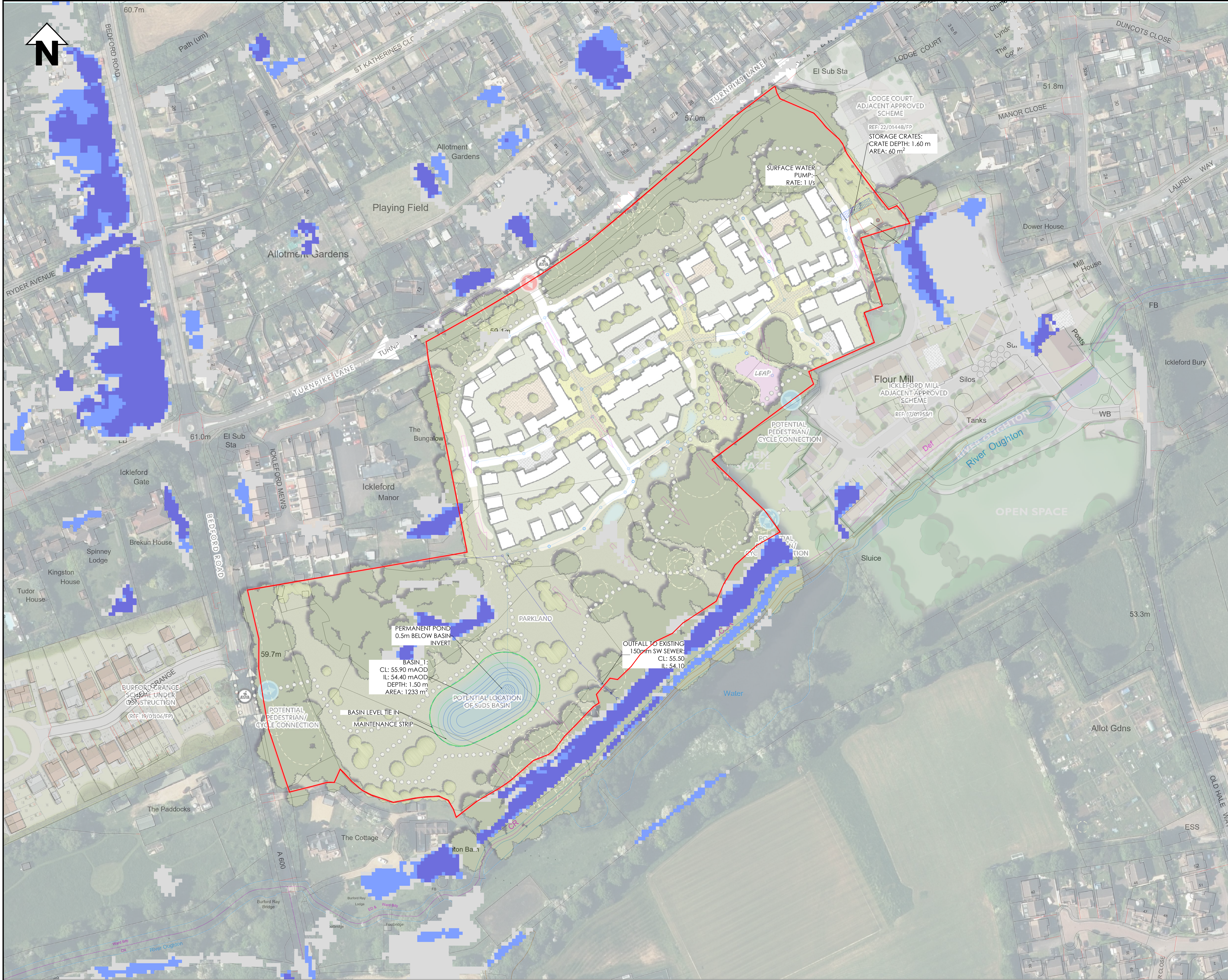
Annex

The following documents have been reviewed.

- Report: Flood Risk Assessment and Drainage Strategy volume 1 of 2 by Create dated August 2025 with reference GB/VL/P25-3474/01.
- Report: Flood Risk Assessment and Drainage Strategy volume 2 of 2 by Create dated August 2025 with reference GB/VL/P25-3474/01.
- Report: Preliminary Risk Assessment by CKConsulting and Geotechnical dated May 2025 with reference GI-201 and revision V2.
- Drawing: Proposed Access Arrangement by RGP dated 23 July 2025 with reference IMI-XX-XX-DR-T-005 and revision P03.

APPENDIX B

Surface Water Extent with masterplan and
drainage strategy



ALL DIMENSIONS TO BE CHECKED BEFORE SITE OR OFF-SITE FABRICATION BY THE CONTRACTOR, SUB-CONTRACTOR OR SUPPLIER.

DO NOT SCALE PLANS - USE FIGURE OR GRID DIMENSIONS WHERE GIVEN. ANY DEVIATION FROM THE DRAWING IS TO BE REPORTED TO THE ORIGINATOR IMMEDIATELY.

DRAWING IS TO BE PRINTED IN COLOUR.

NOTES:

- THIS DRAWING IS FOR PLANNING PURPOSES ONLY AND IS TO BE READ IN CONJUNCTION WITH ALL RELATED ENGINEERS, ARCHITECTS & SUB-CONTRACTORS DRAWINGS. IN THE CASE OF DISCREPANCIES BETWEEN DRAWINGS REFER TO CREATE CONSULTING ENGINEERS FOR CLARIFICATION.
- TOPOGRAPHICAL SURVEY UNDERTAKEN BY MKSURVEYS, DRAWING REF. 35976 DATED JUNE, 2025.
- THIS DRAWING IS BASED ON THE SITE PLANXREF_HAWR.250206 CMP-01 R5 Concept Masterplan_EXT, DATED JULY, 2025.
- ALL INVERT AND COVER LEVELS ARE TO BE CONFIRMED AT THE DETAILED DESIGN STAGE.
- UTILITIES AND THEIR EASEMENTS ARE NOT SHOWN AND ANY CLASHES TO BE CONFIRMED AT DESIGN STAGE.

KEY

PROPOSED SURFACE WATER SEWER

PROPOSED SURFACE WATER RISING MAIN

EXISTING SURFACE WATER SEWER

EXCEEDANCE FLOW ROUTE

APPLICATION SITE REDLINE BOUNDARY

PROPOSED STORAGE CRATES

SURFACE WATER FLOOD RISK: LOW (3.3% AEP)

SURFACE WATER FLOOD RISK: MODERATE (1.0% AEP)

SURFACE WATER FLOOD RISK: HIGH (0.1% AEP)

P03	12/12/25	UPDATED WITH NEW SITE LAYOUT	GGB	CB
P02	22/08/25	UPDATED WITH NEW SITE LAYOUT	GB	CB
P01	25/07/25	INITIAL ISSUE	GB	CB
REV	DATE	DESCRIPTION	DRAWN CHECKED	
CLIENT: HAWRIDGE STRATEGIC LAND LTD				

PROJECT: ICKLEFORD MANOR

DRAWING TITLE: INDICATIVE SURFACE WATER DRAINAGE STRATEGY

DATE	DESIGNED	DRAWN	CHECKED	SCALE(S)
25.07.25	GB	GB	CB	1:1000

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W:\20 NEW PROJECTS\2025\3474 - LAND AT ICKLEFORD MANOR, ICKLEFORD\3.0 CIVILS\3474-CCE-XX-XX-DR-D-0001 A OUTLINE SURFACE WATER DRAINAGE STRATEGY

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