

## Growth & Environment

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**Contact:** SuDS and Watercourses Team  
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**Your ref:** 26/01751/DOC  
**Date:** 3 September 2026

Dear Linda

**RE: Details Reserved by Condition 22 (SW Drainage Design) of Hybrid application reference 24/01013/HYA granted on 30 June 2026 – Land Surrounding Burloes Cottages, Newmarket Road, Royston**

Thank you for your consultation on the above site, received on 21 July 2026. We have reviewed the application as submitted and wish to make the following comments.

We advise that there **isn't sufficient technical information** to support the application in relation to the wording of Condition 22 (Surface Water Drainage Design).

We have concerns that the submitted information does not meet with NPPF, PPG or the LLFA Flood Risk Management Strategy policies and the proposal will either increase the risk of flooding elsewhere or to the proposed development. We provide the following technical review for your consideration.

The LLFA technical review includes;

In regard to **Point I**, the LLFA cannot locate any information regarding BRE Digest 365 (or equivalent) testing for infiltration. If the applicant could signpost this to the LLFA for review, we will review in further consultations. **Further information is required.**

In regard to **Point II**, the LLFA cannot locate any information regarding Greenfield runoff rates or proposed discharge rate for the proposed development. If the applicant could signpost this to the LLFA for review, we will review in further consultations. **Further information is required.**

In regard to **Point III**, the LLFA cannot locate any information regarding surface water attenuation storage calculations for the proposed development. If the applicant could

signpost this to the LLFA for review, we will review in further consultations. **Further information is required.**

In regard to **Point IV**, the LLFA cannot locate any full network calculations for all rainfall return periods up to and including the 1% AEP plus appropriate climate change allowance event utilising the correct parameters (i.e. FEH22, CV value of 1.0, climate change allowance on the 3.33% AEP and 1% AEP events and urban creep allowance of 10%). If the applicant could signpost this to the LLFA for review, we will review in further consultations. **Further information is required.**

In regard to **Point V**, as stated in Point I, the LLFA cannot locate any information regarding BRE Digest 365 (or equivalent) testing for infiltration. If the applicant could signpost this to the LLFA for review, we will review in further consultations. **Further information is required.**

In regard to **Point VI**, the LLFA would like to note that finished floor level is included on the Engineering Layout Sheets 1-4 (prepared by INGENT Consulting Engineers | dated June 2026). However, some plots do not have FFL attached to them, some are lower than corresponding cover levels and none reach the minimum 300mm above the maximum design water level. On this basis, the LLFA are unsatisfied with the information provided. **Further information is required.**

In regard to **Point VII**, the LLFA cannot locate any information regarding surface water management features being designed in accordance with the SuDS manual for the proposed development. If the applicant could signpost this to the LLFA for review, we will review in further consultations. **Further information is required.**

In regard to **Point VIII**, the LLFA cannot locate any information regarding maintenance and management for the proposed development. If the applicant could signpost this to the LLFA for review, we will review in further consultations. **Further information is required.**

## **Informative**

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.

Yours sincerely

Ellie Miller  
SuDS and Watercourses Support Officer  
Growth and Environment

## Annex

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

- Correspondence: Application for Approval of Details Reserved by Condition 22 of 24/01013/HYA - Hybrid application for residential development of up to 325 dwellings at Land Surrounding Burloes Cottages, Royston, Hertfordshire | prepared by Vistry Group | dated 09 July 2026 | Ref: PP-15063895
- Drawing: Engineering Layout Sheet 1 of 4 | prepared by INGENT Consulting Engineers | dated 25 June 2026 | Ref: 2307-831-001E | Rev: A1
- Drawing: Engineering Layout Sheet 2 of 4 | prepared by INGENT Consulting Engineers | dated 25 June 2026 | Ref: 2307-831-002E | Rev: A1
- Drawing: Engineering Layout Sheet 3 of 4 | prepared by INGENT Consulting Engineers | dated 25 June 2026 | Ref: 2307-831-003E | Rev: A1
- Drawing: Engineering Layout Sheet 4 of 4 | prepared by INGENT Consulting Engineers | dated 25 June 2026 | Ref: 2307-831-004E | Rev: A1
- Drawing: Basin Detail Sheet 1 of 2 | prepared by INGENT Consulting Engineers | dated 19 May 2026 | Ref: 2307-831-110B | Rev: A1
- Drawing: Basin Detail Sheet 2 of 2 | prepared by INGENT Consulting Engineers | dated 19 May 2026 | Ref: 2307-831-111A | Rev: A1
- Drawing: Gully Catchment Plan | prepared by INGENT Consulting Engineers | dated 29 May 2026 | Ref: 2307-831-40A | Rev: A1
- Drawing: Drainage Long Section Surface Water | prepared by INGENT Consulting Engineers | dated 19 May 2026 | Ref: 2307-831-140A | Rev: A1
- Drawing: S104 Adoption Plan | prepared by INGENT Consulting Engineers | dated 26 May 2026 | Ref: 2307-831-104B | Rev: A1

For reference, Condition 22 is worded as follows:

*'Prior to commencement on any phase, in accordance with the submitted FRA and Drainage Strategy (dated 21 July 2025, REF 2307-831 REV B), detailed designs of a surface water drainage scheme incorporating the following measures shall be submitted to and agreed with the Local Planning Authority. The approved scheme will be implemented prior to the first occupation of the development. 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.*

*or*

*If infiltration is proven to be unfavourable, then Greenfield runoff rates for the site shall be agreed with the Lead Local Flood Authority. The post development runoff rates will be attenuated to the equivalent Greenfield rate for all rainfall events up to and including the 1% Annual Exceedance Probability (AEP). The discharge location for surface water runoff will be confirmed to connect with the wider watercourse network.*

- 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. *Detailed designs, modelling calculations and plans of the of the drainage conveyance network in the: a. 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. b. 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.*
- IV. *The design of the infiltration basin will incorporate an emergency spillway and any drainage structures include appropriate freeboard allowances. Plans to 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.*
- V. *Finished ground floor levels of properties are a minimum of 300mm above expected flood levels of all sources of flooding (including the ordinary watercourses, SuDS features and within any proposed drainage scheme) or 150mm above ground level, whichever is the more precautionary.*
- VI. *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.*
- VII. *A maintenance and management plan detailing the activities required and details of who will adopt and maintain the all the surface water drainage features for the lifetime of the development'.*