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

Date 1 April 2025

Dear Naomi,

RE: 24/02889/FP – Residential development of 281 dwellings and associated roads, parking, realignment of Back Lane, drainage, landscaping, open space, servicing facilities and associated works – Land at Roundwood Back Lane Graveley Hertfordshire SG1 6GJ.

Thank you for your reconsultation on the above site, received on 10 March 2025. We have reviewed the application as submitted and wish to make the following comments. This is a full planning application and is proposing the construction of 281 dwellings with associated roads, landscaping, open space.

The applicant has submitted a Technical Memorandum dated 7 March 2025 that addresses comments previously made by the LLFA. The LLFA has reviewed this additional information and wish to make the following comments relating to our previous response. We understand that the applicant has agreed that further input is required on some points. Our response clarifies the details that have been addressed, the areas in which further information is required and the details that can be conditioned. We note that this application is for full planning permission.

- 1) The applicant has agreed to seek an updated response from Thames Water. We note that this has been uploaded to the North Herts Planning Portal. **No further information is required.**
- 2) The LLFA asks for drawings of cross-sections and long sections to ensure the proposed SuDS features are viable at the locations suggested while ensuring the correct slope gradients are being included. As this application is for full detailed planning permission, the LLFA requires cross sections and long sections of the proposed SuDS features to ensure they are acceptable and viable in the locations proposed. Swales and ponds should have a minimum slope gradient of 1 in 3 to ensure the risk of erosions is reduced. **Further information required.**

- 3) While we appreciate that an earlier planning application was approved using the default CV values, all new development is required to use a CV value of 1. **Further information is required.**
- 4) The applicant has agreed to provide the 50% AEP results and details of the half-drain times. We note that an appraisal of the storage volumes has been carried out. This will need to be provided to evidence the half-drain times and how the storage will accommodate storm events if 24 hours cannot be achieved. **Further information is required.**
- 5) The exceedance flow path has been provided by the applicant under 1% AEP plus climate change event. **No further information required.**
- 6) Appropriate easements of 3m, vehicular access and off-road parking have been provided to facilitate the maintenance of the SuDS features such as ponds and swales. These SuDS features are to be adopted and maintained by the district council. **No further information required.**
- 7) The LLFA notes the response from the applicant and understand the reasoning. It should be demonstrated that the landscaped areas will not drain into the proposed drainage features at detailed design stage. **To be conditioned.**
- 8) The LLFA recommends the consideration of rainwater harvesting and reuse throughout the development. **To be conditioned.**
- 9) Details of any temporary drainage measures to protect the water environment and any newly built SuDS features will be required and should include details of any water quality and water quantity flow control devices. **To be conditioned.**
- 10) A surface water management and construction phasing plan will be required as it is a phased development. **To be conditioned.**
- 11) A high-level assessment of how water quantity and water quality will be managed during the construction phase is required. **To be conditioned.**

This application has the potential to increase the risk of flooding from the proposed drainage network.

Based on the above, we **maintain our objection** to this planning application in the absence of an acceptable Flood Risk Assessment or / and Drainage Strategy or / and supporting information relating to:

- The development is not in accordance with NPPF, PPG or North Herts local policies including Policy NE8: Sustainable drainage system (Reducing Flood Risk) and Policy NE9: Water quality and environment.

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 outlined below are adequately addressed:

- 1) Drawings of cross sections and long sections of all the network and structures such as ponds and swales are required.
- 2) The drainage strategy and CV values used in the hydraulic calculations under reference 23/02492/FP, which applied to 292 dwellings, are not considered to be acceptable. Since the number of dwellings has now been revised to 281, new hydraulic calculations must be conducted and the applicant must use CV values of 1.0 to account for the worst-case scenario, as using lower CV values could underestimate flood risk in the calculations.
- 3) The applicant must provide hydraulic calculations for 50% AEP rainfall event.
- 4) The half-drain times should be provided for all storage features under all hydraulic modelling scenarios. If a half-drain time of 24 hours cannot be achieved, then the structures must be redesigned to show that it can meet this standard or be increased in size to accommodate a subsequent storm event of 3.33% AEP flood event plus climate change allowance.

As discussed, the following points can be conditioned when the above objections have been addressed:

- 5) The Applicant has not demonstrated consideration of rainwater reuse. We highly recommend that rainwater harvesting and reuse, such as in SuDS planters and/or water butts, is considered throughout the development.
- 6) Due to the likely long duration build out time (including phased development proposals), supporting drainage calculations and drawings are required to show a timeline of how temporary measures will be put in place to protect the water environment and any newly built SuDS features. This will include any temporary water quality and water quantity flow control devices which are required.
- 7) As it is a phased development, a surface water management and construction phasing plan is required. This must show how each phase can be provided independently (in terms of surface water drainage) and how any infrastructure which it relies on will be constructed prior to any housing or commercial development.
- 8) A high-level assessment of how water quantity and water quality will be managed during the construction phase is required. Identifying high level assumptions such as need to discharge to a sewer with appropriate pollution measures.

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.

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.

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

The following documents have been reviewed.

- Report: Technical Memorandum by SLR Consulting Limited dated 7 March 2025.
- Report: Flood Risk Assessment by SLR Consulting Limited (SLR) dated 6 December 2024 revision 04.
- Document: Appendix F Surface water calculations by SLR Consulting Limited (SLR) date 5 December 2024.
- Document: Appendix C Ground Investigation report by SLR Consulting Limited dated 11 January 2022.
- Document: Planning Statement by Stantec dated 24 December 2024 revision 02.