

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

**Lead Local Flood Authority
Growth and Environment
Hertfordshire County Council
Post Point CHN 215
Farnham House
Six Hills Way, Stevenage
HERTFORDSHIRE, SG1 2ST
www.hertfordshire.gov.uk**

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

Date 3 September 2025

Dear Sarah

RE: 24/01013/HYA – Hybrid application for residential development of up to 325 dwellings comprising (a) full planning application for Phase 1 comprising 106 dwellings and associated infrastructure including access from Newmarket Road, emergency and pedestrian/cycle access from Burloes Hall Drive, internal highways, public open space, landscaping and drainage and b) outline application for up to 219 dwellings and associated infrastructure with all matters reserved apart from primary means of access and emergency and pedestrian/cycle access from Burloes Hall Drive – Land Surrounding Burloes Cottages, Newmarket Road, Royston, Hertfordshire

Thank you for your consultation on the above site, received on 11 August 2025. We have reviewed the application as submitted and wish to make the following comments.

We previously responded to this application under planning reference **(24/01013/OP)** with five points of objection (CV value update, water quality, greenfield runoff rates, clarity on permeable paving infiltration and infiltration depths). The Response to the LLFA document (prepared by Ingent Consulting Engineers, 04 March 2025, REF 2307-831) has removed previous objections to this scheme. We are therefore satisfied to remove our objection and recommend the following conditions should this application be granted **(24/01013/HYA)**.

The applicant has provided a Flood Risk Assessment (FRA) and a Drainage Strategy and Technical Response to the LLFA, as listed in the Annex. These are to account for the local flood risk issues and surface water drainage at this location. Following a review of the submitted documents, the details are in accordance with NPPF and Local Plan policy NE08 and NE09.

We have **no objection subject to conditions being attached to any consent** if this application is approved, and the Applicant is in agreement with pre-commencement conditions. We suggest the following wording.

Full Planning Suggested Conditions:

Condition 1

Construction shall not begin until a detailed construction phase surface water management plan for the site has been submitted to and approved in writing by the Local Planning Authority. The scheme shall subsequently be carried out in accordance with the approved details.

Reason: To ensure that the construction of the site does not result in any flooding both on and off site and that all Surface water Drainage features are adequately protected.

Condition 2

All development shall be constructed in accordance with the submitted and approved Flood Risk Assessment (dated 21 July 2025, REF 2307-831 REV B), this includes all new residential dwellings to have a finished floor level raised a minimum of 300mm above any flood level and 150mm above the surrounding proposed ground level unless otherwise first approved in writing by the Local Planning Authority.

Reason: To ensure the flood risk is adequately addressed and not increased in accordance with NPPF and Policies of North Herts Council.

Condition 3:

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 [LPA to specify numbering]. 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 Herts Council.

Outline Planning Suggested Conditions:

Whilst we note that there is a lot of detail for the outline application, we have included our standard outline condition. The wording of this condition allows further amendments during any reserved matters stage, ensuring the drainage is compliant with NPPF, PPG and North Herts Local planning policies.

Condition 1:

Prior to or in conjunction with the submission of each reserved matters application, 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

- II. 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.
- III. 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).
- IV. 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.
- V. 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.
- VI. 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.

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.

VIII. 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.

Reason:

To prevent flooding in accordance with National Planning Policy Framework paragraphs 181, 182 and 187 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:

Prior to or in conjunction with the submission of each Reserved Matters application a detailed Site SuDS Phase plan which aligns with the site phasing plan shall be submitted to and approved in writing by the Local Planning Authority. This SuDS Phasing plan shall ensure that each phase does not exceed the agreed discharge rates for that phase and that source control measures are installed within each phase to adequately address the phases own surface water runoff. The plan shall ensure that each SuDS component is adequately protected throughout the development of the scheme. The plan shall show all exceedance routes throughout the site clearance and construction of the scheme ensuring flood risk is not increased elsewhere or to the site itself and that the site remains safe for all exceedance event flow routes for the lifetime of the development during rainfall (i.e. greater than design events or during blockage) and how property on and off site will be protected.

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 Herts Council.

Informative:

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

Ellie

Ellie Miller
SuDS and Watercourses Support Officer
Growth & Environment

Annex

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

- Correspondence: Response to the LLFA, prepared by INGENT, 04 March 2025, REF 2307-831
- Report: Flood Risk Assessment for Newmarket Road, prepared by INGENT, 21 July 2025, REF 2307-831 REV B
- Drawing: Drainage Strategy Phase 1, prepared by INGENT, 21 July 2025, REF 2307-831-ST100C REV C