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**Lead Local Flood Authority
Growth and Environment
Hertfordshire County Council
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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 Mr Glover

RE: 25/01708/OP - Erection of up to 84 dwellings with public open space, landscaping and sustainable drainage system (SuDS) following demolition of No. 24 Echo Hill with all matters reserved save for access - Land Opposite Heath Farm Briary Lane Royston Hertfordshire

Thank you for your consultation on the above site, received on 18 July 2025. We have reviewed the application as submitted and wish to make the following comments.

We **object** to this planning application in the absence of an acceptable Flood Risk Assessment (FRA) relating to:

- The proposed SuDS are likely to increase the risk of flooding elsewhere.
- The development is not in accordance with NPPF and PPG.

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 following issues are adequately addressed.

1. Justification into the use of the infiltration rate used in the calculations should be provided. Although we note the rates which have been found on the site are varying due to the chalk bedrock underlying the site, the most conservative infiltration rate should be applied in the calculations. $1 \times 10^{-5} \text{m/s}$ has been applied in the calculations

for all the soakaways; however, the lowest rates found in the 2017 testing in the north and south of the site were of the order of 10^{-6} .

2. We note that in the calculations, some of the infiltration components have been designed to allow infiltration out of both the sides and base of the structure. In this case, we would expect the appropriate factor of safety to be applied, as per Table S3.1 in the National standards for sustainable drainage systems. Further information should also be provided to demonstrate that all infiltration features have a half drain time of within 24 hours in all rainfall events up to and including the 3.33% AEP events.
3. Further information should be provided on how residual risk on the site will be managed, mainly regarding the covered reservoir near the southwest corner of the site. It is stated in the FRA that the reservoir is raised above ground level and so any breach would cause flows to enter the development site. In addition, there should be information regarding exceedance flows in the FRA. The site slopes towards the town of Royston and so any exceedance flows are likely to affect the roads and properties to the north of the site.
4. Justification should be provided to explain why the large areas of open space have not been included in the calculations. It is noted that the shallower infiltration tests failed and so there may be runoff from the southwest portion of the site which would end up in one of the two proposed development parcels.

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

Jake

Jake Silverton
SuDS and Watercourses Support Officer
Growth and Environment

Annex

The following documents have been reviewed.

- Report: Flood Risk Assessment, GTA Civils and Transport Ltd, May 2025