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

Date 6 January 2025

Dear Ms Kasparian

RE: 24/01013/OP – Hybrid application for residential development of up to 325 dwellings comprising (a) full planning application for Phase 1 comprising 102 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 223 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

Thank you for your consultation on the above site, received on 21 May 2024. We have reviewed the application as submitted and wish to make the following comments.

We understand the application to be split into two parts: with the first being for the full application for 102 dwellings, associated infrastructure and an emergency access and the second being for an outline application for up to 223 dwellings and associated infrastructure.

The applicant has provided a Flood Risk Assessment (FRA) and a Drainage Strategy (dated 18 March 2024, REF 2307-831) 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 planning Policy NE8 Sustainable drainage systems (Reducing Flood Risk) and Policy NE9: Water quality and environment.

A sequential approach has been taken towards the development and appropriate investigations have been carried out and the LLFA is happy with the proposals to drain via infiltration. However, we are concerned that the current proposed drainage strategy may not be appropriate for the proposed development. The submitted drainage

calculations do not use the correct CV value meaning the impermeable area has not been appropriately modelled. The ground investigation has shown that the site has good infiltration rates, but the development is reliant on large basins and tanks rather than individual soakaways for properties. The reliance on a piped design increases the depths of the basins and tanks. Further justification should be made for why more appropriate source control features have not been utilised within the development and more details on water quality are required.

In relation to the outline application for up to 223 dwellings, we are concerned that changes to the sustainable drainage strategy for the full application could have implication on the proposals and SuDS requirements for the rest of the development.

We **object** to this planning application in the absence of an acceptable Flood Risk Assessment (FRA) or / and Drainage Strategy or and supporting information relating to:

- The proposed SuDS are likely to increase the risk of flooding elsewhere.
- The development is not in accordance with NPPF, PPG or North Herts Council local policies including Policy NE7 and NE8.

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. The correct parameters must be used for the drainage calculations. The provided calculations use the incorrect CV value. A CV value of 1 must be used to ensure the impermeable area has been correctly modelled and the drainage structures and attenuation are correctly sized
2. Several infiltration tests have been undertaken at the site and have shown that infiltration is viable across the site. Further justification is required as to why individual soakaways are not being utilised at the site rather than relying on large basins and tanks within the development.
3. The Simple Index Approach (SIA) for assessing water quality management requirements have not been submitted and should be carried out and submitted.
4. Greenfield Runoff Calculations for the site should be provided.
5. It is not clear from the calculations that permeable paving has been included within the surface water modelling. All SuDS features should be modelled appropriately.

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

Alex

Alex Jones
SuDS and Watercourses Support Officer
Growth and Environment

Annex

The following documents have been reviewed.

- Flood Risk Assessment, EINGENT, 18 March 2024, 2307-831