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

Date 21 July 2025

Dear Tom

RE: 25/00104/FP - Residential development to provide 9 flats with associated vehicular parking and access via existing dropped kerb from King James Way with ancillary bike and refuse store - Land to the rear of Banyers Hotel King James Way Royston Hertfordshire SG8 7BZ

Thank you for your consultation on the above site, received on 3 June 2025. We have reviewed the application as submitted and wish to make the following comments.

This is a full planning application for Residential development to provide 9 flats with associated vehicular parking and access via existing dropped kerb from King James Way with ancillary bike and refuse store.

We have concerns regarding this development as the site is located within a surface water flow path and is at risk of surface water flooding. We would advise that the LPA should consider if this site has sufficiently investigated the sequential test for development at this location. NPPF states that all sources of flooding should be considered when carrying out the sequential test. The applicant is suggesting mitigation of the proposals, raising floor levels, instead of undertaking the sequential test. The sequential approach should also be applied within the site boundary, but this development is suggesting altering the surface water flow paths without an assessment to demonstrate that it would not increase the flood risk elsewhere. We wish to highlight that avoidance of flood risk is the most sustainable method of flood risk management. Safe access and egress for the proposed residents is also essential, as per the updates to NPPF and PPG.

We **object** to this planning application in the absence of an acceptable and Drainage Strategy relating to:

- The development is at risk of surface water flooding. **We advise that you as Local Planning Authority ensure that this application passes the sequential test.**
- The development not complying with NPPF, PPG or local policies: *Policy NE8: Sustainable drainage systems (Reducing Flood Risk)*, *Policy NE9: Water quality and environment*, *Policy SP12: Green infrastructure, biodiversity and landscape*.

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 along with **issues highlighted in the technical checklist letter dated 13 March 2025** are adequately addressed.

1. A sequential test is recommended to be conducted for the site as majority of the site is in a surface water flow path with high risk of flooding. The response given by the applicant is not satisfactory and more clarification on the proposed mitigations measures are required. It should be noted that the access and egress to the site is cut off by the predicted flood risk (0.1% AEP surface water flooding – as a proxy for the 1% AEP plus climate change).
2. Evidence to prove that the development will not increase flood risk elsewhere is required. We are concerned by the proposal to develop a greenfield site to a more vulnerable use (residential housing) in a location where majority of the site is at flood risk and not in line with NPPF or PPG. An explanation and detailed evidence backing the claims of applicant that this will create betterment of flood risk elsewhere is required.
3. Information on safe access and egress to show how the development will be safe for its lifetime should be submitted. Safe access passing through pocket of 300mm flood water is not acceptable, further clarification and proof that the access and egress proposed for the site is acceptable is required.
4. If the sequential test and exception test are passed, then other flood resilience such as raised finished floor levels above the expected flood level will be required.
5. We still require infiltration testing to BRE365 standard (or equivalent) for the site. An infiltration rate of 1×10^{-6} m/s can be used if infiltration testing cannot be undertaken but there also needs to be a 'Plan B' proven to allow discharge of runoff from the site (e.g. to a watercourse or a surface water sewer – including in principle acceptance from the sewerage undertaker). A detailed report of the infiltration tests is required and the worst infiltration rate for the site is required to be used for design.

6. If infiltration is not found viable according to BRE365 at the site, then an alternative method of surface water discharge will be required. Greenfield runoff rates would need to be calculated for the site and any new method would need to have a discharge rate limited to the greenfield runoff rate.
7. The drainage strategy plan provided should be appropriately labelled with pipe numbers matching with the corresponding drainage calculations. LLFA is mentioning about the drawing **titled “Indicative Drainage Strategy, by encon, dwg no. DR-D-1001, Rev A** and pipe numbering required to be provided in the drawing.

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

Raima

Raima Prasad
SuDS and Watercourses Support Officer
Growth and Environment

Annex

The following documents have been reviewed.

- Response Letter to LLFA, by barker, dated 28 May 2025, ref: P24-0782