

Ben Glover
North Herts Council
PO Box 10613
Borehamwood
Hertfordshire
WD6 1WA

Lead Local Flood Authority
Post Point CHN 215
Hertfordshire County Council
County Hall, Pegs Lane
HERTFORD SG13 8DN
www.hertfordshire.gov.uk

Contact Flood Risk Management Team
Email FRMConsultations@hertfordshire.gov.uk

Date 7 October 2024

Dear Ben

RE: 24/01883/RM – Reserved Matters Application in respect of the approved planning permission REF: 18/01502/OP – Land between Royston Road and Cambridge Road, Barkway

Thank you for your consultation on the above site, received on 6 September 2024. We have reviewed the application as submitted and wish to make the following comments.

This application is for the approval of reserved matters comprising: details of the siting, design and external appearance of the development, and the landscaping of the site in respect of the approved outline planning permission ref: 18/01502/OP for the development of 140 dwellings and a new shop on the land between Royston Road and Cambridge Road, Barkway.

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

- The proposed SuDS are likely to increase the risk of flooding elsewhere.
- This development does not comply with NPPF, PPG or local policies.
 - Policy NE8 – Sustainable Drainage Systems (Reducing Flood Risk)
 - Policy SP12 – Green Infrastructure, biodiversity and landscape

We have concerns that the submitted information does not meet with NPPF, PPG or the LLFA Flood Risk Management Strategy policies and the proposal will either increase the risk of flooding elsewhere or to the proposed development. We provide the following technical review for your consideration.

The technical review includes:

1. We note that the basin volume is higher at the reserved matters stage (originally 3030m³), the LLFA is concerned that no supporting evidence of updated infiltration testing (as mentioned in the technical Note completed May 2024), calculations and commentary outlining how this alternative drainage strategy will work. The LLFA is also concerned that no updated calculations have been provided for all rainfall return periods up to and including the 1% AEP plus appropriate climate change allowance event or if the number of deep bore soakaways is sufficient (hence the storage and layout of the development would not change). **Further information is required.**
2. We are concerned that original strategy has not been taken forward to discharge to the surface water sewer at 20.7 l/s and where the overall discharge point on the reserved matters application is unclear. The alternative strategy appears to have been taken forward for discharge to deep infiltration (to an unknown depth or if water quality and pollution measures can be put in place in above ground SuDS features).. **Further information is required.**
3. We do not believe sufficient information on the primary and alternative strategy has been provided. We would want to see reasoning as to what has changed, why it has changed and how this would affect the system overall. **Further information is required.**
4. For information any storage feature would need a ½ drain down time of 48 hours for a lined system (e.g. discharge to a surface water sewer) or within 24 hours for an infiltration system. Additional mitigation measures with additional storage would be required if this could not be met. For the avoidance of doubt the ½ drain down time of 24 hours or 48 hours would be for the 1% AEP plus climate change rainfall event.

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
Environment & Transport and Sustainable Growth

Annex

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

- Barkway Drainage Technical Note for the proposed development at Land between Royston Road, prepared by Redrow, August 2024
- Drainage Maintenance Strategy for the proposed development at Land between Royston Road, prepared by Robert West, August 2024, REF 4929/002/001 – REV 1
- Proposed Drainage – Sheet 1 for the proposed development at Land between Royston Road, prepared by Robert West, August 2024, REF 4929-002-5001-P03
- Proposed Drainage – Sheet 2 for the proposed development at Land between Royston Road, prepared by Robert West, August 2024, REF 4929-002-5002-P04
- Proposed Drainage – Sheet 3 for the proposed development at Land between Royston Road, prepared by Robert West, August 2024, REF 4929-002-5003-P03
- Proposed Drainage – Sheet 4 for the proposed development at Land between Royston Road, prepared by Robert West, August 2024, REF 4929-002-5004-P03
- Proposed Drainage – Sheet 5 for the proposed development at Land between Royston Road, prepared by Robert West, August 2024, REF 4929-002-5005-P04
- Proposed Drainage – Sheet 6 for the proposed development at Land between Royston Road, prepared by Robert West, August 2024, REF 4929-002-5006-P03