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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 11 July 2025

Dear Naomi,

RE: 24/02889/FP – Residential development of 281 dwellings and associated roads, parking, realignment of Back Lane, drainage, landscaping, open space, servicing facilities and associated works – Land at Roundwood Back Lane Graveley Hertfordshire SG1 6GJ.

Thank you for your reconsultation on the above site, received on 24 June 2025. We have reviewed the application as submitted and wish to make the following comments. This is a full planning application and is proposing the construction of 281 dwellings with associated roads, landscaping, open space.

The applicant has submitted a Technical Memorandum dated 23 May 2025 which follows a meeting held between the applicant and the LLFA on the 08 May 2025. The Technical Memorandum addresses comments previously made by the LLFA on the 01 April 2025. The LLFA is satisfied that the information provided covers the concerns previously raised by the LLFA in relation to the required drawings and the updated calculations using the correct parameters. The LLFA remains concerned around the half drain times of the attenuation basins. The Technical Memorandum provides an assessment of the basins with supporting hydraulic calculations to show that the basins can accommodate a 1% AEP flood event and a consecutive 5.9% AEP flood event. While this does not achieve the suggested consecutive 3.33% AEP flood event, the LLFA appreciates that storage has been maximised on site and that there are storage elements within the surface water drainage network that have not been included within these calculations.

Therefore, we have **no objection subject to conditions being attached to any consent** if this application is approved. We suggest the following wording.

Condition 1

All development shall be constructed in accordance with the submitted and approved Flood Risk Assessment (dated 6 December 2024), 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 2

Prior to the commencement of development, construction drawings of the surface water drainage network, associated sustainable drainage components and flow control mechanisms and a construction method statement shall be submitted and agreed in writing by the local planning authority. The scheme shall then be constructed as per the agreed drawings, method statement, Flood Risk Assessment (dated 6 December 2024) and Technical Memorandum (dated 23 May 2025) and remaining in perpetuity for the lifetime of the development unless agreed in writing by the Local Planning Authority. No alteration to the agreed drainage scheme shall occur without prior written approval from the Local Authority.

Reason: To ensure that the development achieves a high standard of sustainability and to comply with NPPF Policies of North Herts Council.

Condition 3

The development hereby approved shall not be occupied until details of the maintenance and management of the sustainable drainage scheme have been submitted to and approved in writing by the Local Planning Authority. The drainage scheme shall be implemented prior to the first occupation of the development hereby approved and thereafter managed and maintained in accordance with the approved details in perpetuity. The Local Planning Authority shall be granted access to inspect the sustainable drainage scheme for the lifetime of the development. The details of the scheme to be submitted for approval shall include:

- I. a timetable for its implementation
- II. details of SuDS feature and connecting drainage structures and maintenance requirement for each aspect including a drawing showing where they are located.
- III. a management and maintenance plan for the lifetime of the development which shall include the arrangements for adoption by any public body or statutory undertaker, or any other arrangements to secure the operation of the sustainable drainage scheme throughout its lifetime. This will include the name and contact details of any appointed management company.

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

Condition 4

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]. 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.

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 Team
Growth and Environment

Annex

The following documents have been reviewed.

- Report: Technical Memorandum by SLR Consulting Limited dated 23 May 2025.
- Report: Flood Risk Assessment by SLR Consulting Limited (SLR) dated 6 December 2024 revision 04.
- Document: Appendix C Ground Investigation report by SLR Consulting Limited dated 11 January 2022.
- Document: Planning Statement by Stantec dated 24 December 2024 revision 02.