

Growth & Environment

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Contact: SuDS and Watercourses Team
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Your ref: 25/03149/RM
Date: 26 March 2026

Dear Ben

RE: 25/03149/RM – Approval of reserved matters (access, appearance, landscaping, layout and scale) for the erection of 140 residential dwellings with associated landscaping, highways, drainage, public open space and ancillary infrastructure pursuant to outline planning permission reference 25/02234/S73 granted 3 December 2025 – Land Between Royston Road and Cambridge Road, Barkway

Thank you for your consultation on the above site, received on 8 January 2026. We have reviewed the application as submitted and wish to make the following comments.

This application seeks to discharge the following:

- Conditions 4 (Masterplan Compliance Statement), 5 (landscaping details) and 21 (surface water drainage scheme) of the outline planning permission; and
- Planning Obligation 2.3 (Affordable Housing Scheme) of the Second Schedule of the Section 106 legal agreement dated 19 July 2023.

As conditions 4 (Masterplan Compliance Statement) and 5 (landscaping details) are not related to surface water discharge or flood risk, the LLFA has no further comments to make. For reference, Condition 21 is worded as follows:

‘Notwithstanding the surface water drainage strategy set out within the approved Flood Risk Assessment (Ardent Consulting, reference 163461-02a dated June 2018), prior to commencement of development a detailed surface water drainage scheme shall be submitted to and approved in writing by the Local Planning Authority. The surface water drainage scheme shall include:

1. Implementation of the appropriate drainage strategy based on infiltration into using appropriate above ground SuDS measures; and

2. Provision of storage to ensure no increase in surface water run-off volumes for all rainfall events up to and including the 1 in 100 year + 40% climate change event.

The surface water drainage scheme shall be fully implemented prior to full site occupation and in accordance with the timing / phasing arrangements embodied within the scheme, or within any other period as may subsequently be agreed, in writing, by the local planning authority.

Reason: *To reduce the risk of flooding to the proposed development and future Occupants’.*

We advise that there **isn't sufficient technical information** to support the application in relation to the wording of Condition 21.

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 main issues include;

- Infiltration testing – Evidence that shallow infiltration is not viable.
- Infiltration testing – Evidence that boreholes are viable.
- Discharge Hierarchy – Further consideration of other disposal methods prior to allowing boreholes. Boreholes are by exception only.
- Supporting Calculations – all rainfall return period events up to and including the 1% AEP event.

The LLFA technical review includes;

In relation to **Condition 21 Point 1**, we note a ground investigation report was quoted in the Barkway Drainage Technical Note (Rev A) (Ref: BMK23256_Barkway Ground Conditions Report, dated 13 May 2024). However, the LLFA cannot locate this for review. We would need to see this to see if sufficient evidence that shallow infiltration has been undertaken and is not viable. Once this has been confirmed, we would need to ensure that the discharge hierarchy has been revisited (i.e. discharge to watercourse and sewer are not achievable) and supporting evidence that boreholes are the only viable method of discharge should be provided. We would like to remind the applicant that boreholes are by exception only. **Further information is required.**

In relation to **Condition 21 Point 2**, we have not commented on the drainage drawings at the present time due to Point 1 having outstanding issues. We would like to remind the applicant that to be line with Condition 21 Point 2 supporting calculations need to be provided to evidence sufficient provision of storage to ensure no increase in surface water run-off volumes for all rainfall events up to and including the 1 in 100 year + 40% climate change event. This should include up to date parameters (i.e. FEH22, climate change allowance on the 3.33% AEP event and 1% AEP event, urban creep (10%) and a CV value of 1). **Further information is required.**

Informative

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.

Yours sincerely

Ellie

Ellie Miller
SuDS and Watercourses Support Officer
Growth and Environment

Annex

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

- Report: Barkway Drainage Technical Note | Rev: A
- Correspondence: Reserved Matters Application in accordance with Outline Planning Permission Reference 25/02234/S73 | prepared by Redrow | dated 11 December 2025
- Drawing: Proposed Drainage – Sheet 1 | prepared by Robert West | dated 15 October 2025 | Ref: 4929-002-5001-T02
- Drawing: Proposed Drainage – Sheet 2 | prepared by Robert West | dated 15 October 2025 | Ref: 4929-002-5002-T02
- Drawing: Proposed Drainage – Sheet 3 | prepared by Robert West | dated 15 October 2025 | Ref: 4929-002-5003-T02
- Drawing: Proposed Drainage – Sheet 4 | prepared by Robert West | dated 15 October 2025 | Ref: 4929-002-5004-T02
- Drawing: Proposed Drainage – Sheet 5 | prepared by Robert West | dated 15 October 2025 | Ref: 4929-002-5005-T02
- Drawing: Proposed Drainage – Sheet 6 | prepared by Robert West | dated 15 October 2025 | Ref: 4929-002-5006-T02