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

Date 13 March 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 11 February 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 serious 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 also 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 sequential approach should also be applied within the site boundary, but this development is suggesting altering the surface water flow paths. We wish to highlight that avoidance of flood risk is the most sustainable method of flood risk management.

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 provided** are adequately addressed.

1. A sequential test is required to be conducted for the site as majority of the site is in a surface water flow path with high risk of flooding.
2. Evidence to prove that the development will not increase 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.
4. Infiltration tests to BRE365 standard (or equivalent) are required for the site. An infiltration rate cannot be assumed at this point, as this is a full planning application. A detailed report of the infiltration tests is required and the worst infiltration rate for the site is required to be used for design.
5. If infiltration is not viable at the site, 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.
6. Finished floor levels should be raised by at least 300mm above the design flood level and 150mm above the external ground levels.
7. Wherever possible, additional SuDS features should be incorporated in the drainage strategy. If they cannot be incorporated, evidence should be provided to show why they are not viable. SuDS features should incorporate the 4 pillars of sustainable drainage which are water quality, water quantity, biodiversity and amenity benefits. Permeable pavement alone could not satisfy 4 pillars of SuDS sustainability.
8. The Drainage strategy plan provided should be appropriately labelled with pipe numbers matching with the corresponding drainage calculations.
9. Updated drainage calculations are required to include a CV value of 1 for all simulations. Simulation calculations for 3.33% AEP plus climate change allowance required to be provided.

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.

- New apartments, Land to rear of Banyers Hotel, Royston Drainage Validation Report, by Barker, January 2025, Reference: P24-0782.
- Proposed Drainage Strategy, by Barker, January 2025, Dwg no. LCP-BNR001-BA-A1-ZZ-DR-C-2007, Rev no. P01.