

Planning Application Technical Response



Site:	Land To The Rear Of Banyers Hotel King James Way Royston Hertfordshire SG8 7BZ
LPA Reference:	25/00104/FP
Date Assessed:	13 March 2025

FULL APPLICATION	Related Policy or Standard	Applicant Action Required	LLFA Specific Comment
All sources of flooding considered?	NPPF Paragraph 170, 181 PPG Paragraph 051 SDNSTS S10 <i>Policy NE8: Sustainable drainage systems (Reducing Flood Risk), Policy NE9: Water quality and environment, Policy SP12: Green infrastructure, biodiversity and landscape</i>	Provide updated information within an amended FRA on; ☐ Fluvial flooding from the ordinary watercourse ☐ Surface water flow path originating offsite ☐ Groundwater flooding ☐ Rainwater surcharged sewer flooding ☐ Historic flood information	There is a surface water flow path originating offsite and the site is under high risk of surface water flooding
		☐ Address concerns that there is not sufficient room within the development boundary to address flood risk mitigation and also achieved the suggested density of the development.	NA
Mitigation not appropriate	NPPF Paragraph 170, 176, and 181 PPG Paragraph 004, 023, 037, 041, 042, 043 and 044 <i>Policy NE8: Sustainable drainage systems (Reducing Flood Risk), Policy NE9: Water quality and environment, Policy SP12: Green infrastructure, biodiversity and landscape</i>	☒ Use sequential approach with the following hierarchy. I. how can the development first avoid the risk of flooding II. how will it be mitigated (with evidence) III. how will flood resistance and resilience be employed	Objection: Sequential approach has not been followed. The development can conduct a sequential test initially to avoid the risk of flooding
		☒ The proposal increases the risk of flooding to existing infrastructure, dwellings or property. Mitigation should be reassessed to show how flood risk can be reduced overall.	Objection: The proposed development may increase the flood risk elsewhere
		☒ Provide information on safe access and egress to show how the development will be safe for its lifetime. This may include assessment of how proposals will not increase the number of people living and working in areas of flood risk and if there is any additional burden placed on the emergency services. An emergency plan may also form part of this	Objection: Data not provided

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		assessment (see www.adeptnet.org.uk).	
Long term sustainability of the development	NPPF Paragraph 176 and 181 PPG Paragraph 004, 036, 061, 068 and 069 <i>Policy NE8: Sustainable drainage systems (Reducing Flood Risk), Policy NE9: Water quality and environment, Policy SP12: Green infrastructure, biodiversity and landscape</i>	☒ Provide site specific ordinary watercourse or surface water flow path hydrological and hydraulic modelling.	Objection: Hydrological and hydraulic modelling report not provided. The hydraulic modelling report provided covers the drainage design not the existing flood risk.
		☒ Demonstrate that any residual risk is managed with appropriate flood resistance and resilience measures.	Objection: Data not provided
		☒ Include evidence of appropriate freeboard to finished floor levels from the design flood level.	Objection: Finished floor level should be raised by at least 300mm above the design flood level and 150mm above the external ground levels.
		☒ Include appropriate climate change allowance on modelling scenarios for assessment of the lifetime of the development (including the 3.33% AEP design flood event).	Objection: Hydrological and hydraulic modelling report not provided. The hydraulic modelling report provided covers the drainage design not the existing flood risk.
		☒ Use up to date FEH2013 or 2022 rainfall data for all design flood events.	Objection: Hydrological and hydraulic modelling report not provided. The hydraulic modelling report provided covers the drainage design not the existing flood risk.
		☐ Identification is required of those structures which require consent for works on an ordinary watercourse (from the LLFA), this extends to works required within 8m from the top of the bank (see HCC LLFA website).	NA

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How does the site currently drain?	NPPF Paragraph 182 PPG Paragraph 059 SDNSTS S1, S2, S3, S4, S5, S6 <i>Policy NE8: Sustainable drainage systems (Reducing Flood Risk), Policy NE9: Water quality and environment, Policy SP12: Green infrastructure, biodiversity and landscape</i>	☒ Evidence required on ground conditions / BRE365 or similar infiltration testing / dissolution potential / seasonally high groundwater levels.	Objection: BRE365 Infiltration test results required to be submitted
		☐ Greenfield runoff rates and volumes are missing or need to be recalculated (incorrect input parameters).	Informative: Greenfield runoff rate is not included; The runoff rates should be limited to greenfield rate if infiltration is found not feasible. However Anglian Water have stated in the Pre-Planning Assessment Report that their SW sewer does not have capacity to accommodate discharge from the site.
		☐ Pre-development brownfield runoff rates are missing or need to be recalculated (incorrect input parameters).	NA
		☐ Drawing required to show where existing drainage network and outfall/s are, plus confirmation if will they be retained or removed.	NA
Where will the site drain to?	NPPF Paragraph 182 PPG Paragraph 055, 056, 059, 060, 061, 062 and 063 SDNSTS S12, 13 and S14	☐ Drainage survey required to provide evidence of existing discharge rate and condition (may include detailed asset or CCTV survey and estimation of discharge from an existing pipe diameter/slope).	NA
		Drainage location hierarchy has not been followed, further information is required on; ☐ Evidence why rainwater reuse can't be included.	Informative: Infiltration is proposed however infiltration test result required to be submitted. Informative: Rainwater reuse is not proposed

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	<i>Policy NE8: Sustainable drainage systems (Reducing Flood Risk), Policy NE9: Water quality and environment, Policy SP12: Green infrastructure, biodiversity and landscape</i>	☐ Source control and interception has not been provided by the provision of vegetated SuDS.	Informative: The only SuDS feature proposed is permeable pavement. More features required to be included
		☐ Infiltration proposals – re Groundwater Source Protection Zone I restrictions (only clean roof water in a sealed system may be discharged).	Informative: The site is in SPZ 3 zone
		☐ Surface watercourse – does it connect to the wider network and is there permission and there are agreed access locations for proposed outfalls with the riparian owner?	NA
		☐ Surface water sewer – no in principle agreement from owner of the asset.	Informative: Currently the site is not proposing to discharge to sewer but the LLFA requires an in principle agreement from owner of the asset if infiltration is not found feasible and discharge to surface water sewer is proposed. Anglian Water have stated in the Pre-Planning Assessment Report that their SW sewer does not have capacity to accommodate discharge from the site.
		☐ Combined sewer – no in principle agreement from owner of the asset.	NA
		☐ In principle objection - proposing to connect surface water runoff to foul sewer.	NA
		☐ Detailed justification required why the application cannot be drained via gravity and a pump is required.	NA

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		☐ Full impact assessment of failure of a pumped system and emergency procedures to store 24 hours of water is required.	NA
		☐ Justification is required as to why a deep bore infiltration feature has been proposed prior to shallow infiltration or connection to a surface watercourse.	NA
Are the 4 pillars of SuDS provided and are they multifunctional?	NPPF Paragraph 182 PPG Paragraph 036, 055, 056, 059, 060, 061, 062 and 063 <i>Policy NE8: Sustainable drainage systems (Reducing Flood Risk), Policy NE9: Water quality and environment, Policy SP12: Green infrastructure, biodiversity and landscape</i>	☐ The application must provide water quantity benefits in open and above ground SuDS.	Informative: The only SuDS feature proposed is permeable pavement. More features required to be included
		☐ The application must provide water quality benefits. Appropriate water quality assessment is absent / incorrect.	Informative: The only SuDS feature proposed is permeable pavement. More features required to be included
		☐ Additional water quality treatment using surface SuDS is required due to the sensitivity of the discharge location (including groundwater, designated surface watercourses or deep infiltration features).	NA
		☐ The application must provide biodiversity benefits or demonstrate why this is not achievable (lack of space will not be accepted).	Informative: The only SuDS feature proposed is permeable pavement. More features required to be included
		☐ The application must provide amenity benefits or demonstrate why this is not achievable (lack of space will not be accepted).	Informative: The only SuDS feature proposed is permeable pavement. More features required to be included
How will the site drain without adversely effecting flood risk elsewhere?	NPPF Paragraph 181, 182 SDNSTS S2, S3, S4, S5, S6	☒ The most precautionary infiltration rate should be used in the design of the attenuation feature.	Objection: Only an indicative infiltration rate has been provided. Infiltration rate should be informed by BRE365 testing.

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	<i>Policy NE8: Sustainable drainage systems (Reducing Flood Risk), Policy NE9: Water quality and environment, Policy SP12: Green infrastructure, biodiversity and landscape</i>	☒ Infiltration rates are shown to be favourable and should be used in the drainage design (where appropriate).	Objection: Only an indicative infiltration rate has been provided. Infiltration rate should be informed by BRE365 testing.
		☐ Infiltration storage drainage design should be recalculated to either only discharge through the sides of the structure or apply the appropriate factor of safety.	Provided
		☐ Infiltration drainage storage has half drain down time greater than 24 hours and an alternative design or mitigation is required.	NA
		☐ The post development 100% AEP (or 1 in 1 year) rainfall event runoff rate should also be controlled to the equivalent pre-development rate.	Informative: Pre-development rate are not provided
		☐ Proposed discharge rates and volumes are greater than greenfield with no justification.	Informative: Greenfield runoff rates are not provided
		☐ Proposed discharge rates include future allowances for climate change and / or urban creep. These must be removed, and all calculations resubmitted.	NA
		☐ Require justification and supporting calculations for brownfield % betterment and why this can't be closer to the predevelopment greenfield scenario.	NA
		☐ Proposed discharged rates would increase flood risk elsewhere and need to be re-assessed.	NA
		☐ A minimum runoff rate between 1 to 2 l/s/ha should be applied in	NA

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		groundwater dominated areas if infiltration cannot be undertaken.	
		☐ How will the development not increase the volume of runoff as only pre and post calculations of greenfield runoff rate have been provided?	NA
		☐ A complex control for runoff rate with long term storage provided, is required, if the drainage proposal is not limiting runoff to QBAR or 2 l/s/ha.	NA
		☒ Include appropriate climate change allowance for the lifetime of the development (including 3.33% AEP design) for drainage modelling storage volumes.	Objection: Climate change allowance for 1 in 30 year plus climate change return period has not been applied for the drainage modelling.
		☐ Drainage modelling calculations should be resubmitted and demonstrate how 10% urban creep has been included in the volume of SuDS storage required.	NA
		☐ Use up to date FEH2013 or FEH2022 rainfall parameters in any drainage modelling scenarios.	FEH 2022 used
Location of SuDS		☐ Layout and/or drainage layout drawings need to show all the drainage features (storage and conveyance), with labels the same as those in the submitted supporting calculations.	Informative: Pipe numbering not provided
		☐ Drawings need to show the detailed design (not preliminary issue).	Informative: Pipe numbering not provided

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		☐ Drawings of cross sections and long sections of all the network and structures such as ponds, basins and swales need to be supplied.	NA
What is the impact of flood risk on the development?	NPPF Paragraph 182 SDNSTS S7, S8, S9, S10 and S11 <i>Policy NE8: Sustainable drainage systems (Reducing Flood Risk), Policy NE9: Water quality and environment, Policy SP12: Green infrastructure, biodiversity and landscape</i>	Updated supporting calculations required to show;	
		☒ revised modelling calculations to use a CV value of 1.	Objection: CV value is not 1 in calculations
		☐ 50% AEP rainfall event does not surcharge in the drainage network if it is to be adopted by a responsible authority.	Informative: Provided, need to resubmit if infiltration is found not feasible
		☐ 3.33% AEP rainfall event plus climate change does not flood outside the drainage network which is designed to hold water.	Informative: Not provided
		☐ 1% AEP rainfall event plus climate change does not leave the application boundary or flood any part of a building, utility plant susceptible to water (e.g. pumping station or substation) within the development boundary.	Informative: Provided, need to resubmit if infiltration is found not feasible
		☒ the appropriate climate change allowance must be updated.	Objection: climate change allowance for 1 in 30 year return period is not provided
		Additional information is required showing; ☐ above ground flooding (extent, depth and velocity) at the 1% AEP rainfall event plus climate change must be provided on a drawing with proposed external ground levels and proposed finished floor levels of buildings.	NA

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		☐ above ground flooding (extent and depth) at the 1% AEP rainfall event plus climate change should be designed to be held in the least vulnerable areas of the site e.g. open space.	NA
		Flood resistance and resilience must be shown to be included in the design. ☒ A minimum of 300mm must be provided between any design flood event and the finished ground floor level. ☒ A minimum of 150mm above external ground levels and show that they are sloping away from vulnerable areas such as doorways.	Objection: Freeboard of 150mm is not sufficient for surface water flow path in the site. A minimum of 300mm must be provided between any design flood event and the finished ground floor level.
		☐ Exceedance of the design 1% AEP rainfall event plus climate change (or failure of the drainage network) must be shown on a drawing, minimising impacts to people and property. This drawing will include proposed external ground levels, finished floor levels and any designed slopes on impermeable surfaces such as highways or car parks.	Provided
		☐ ½ drain down times need to be submitted and show that they are within 24 hours (or within 48 hours for features that are lined e.g. lined tanks or lined basins).	Provided
		☐ Any drainage network showing storage features with ½ drain down time greater than the 24 hours (or 48 hours for lined structures) must be redesigned to show how it can meet this standard or be increased in size to accommodate a subsequent storm event of 3.33% AEP flood event plus climate change allowance.	Provided

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		☐ The drainage calculations must be shown to include a surcharged outfall to a watercourse or culverted watercourse or watercourse within a sewer. This surcharge level must be the 1% AEP flood event of the receiving watercourse if known or bank full if not already hydraulically modelled.	NA
How will the drainage and watercourse features be managed and maintained?	NPPF Paragraph 182 PPG Paragraph 055, 057 and 058 SDNSTS S10, S11, S12, S13 and S14	☐ High level assessment of the maintenance of any SuDS features and structures and who will be adopting these features for the lifetime of the development.	Maintenance schedule is provided
		☐ Appropriate easements (to the adopting authority standard) to SuDS features should be shown on a drawing, this will be a minimum of 3m.	NA
		☐ Vehicular access route and off-road parking needs to be provided to ponds, basins and swales.	NA
		☐ Provide an easement of a minimum of 3 m from the top bank of any watercourse is required for maintenance. This should be on both banks, but justification should be provided if access is proposed from only one side of the bank or is less than 3m (e.g. 2.5 times the width of any plant likely to be used (from the top of bank with maintenance plant parallel to the watercourse)).	NA

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		☐ Due to the likely long duration build out time (including phased development proposals), supporting drainage calculations and drawings are required to show a timeline of how temporary measures will be put in place to protect the water environment and any newly built SuDS features. This will include any temporary water quality and water quantity flow control devices required.	NA
		☐ As it is a phased development, a surface water management and construction phasing plan is required. This must show how each phase can be provided independently (in terms of surface water drainage) and how any infrastructure which is relies on will be constructed prior to any housing or commercial development.	NA
		☐ A high-level assessment of how water quantity and water quality will be managed during the construction phase is required. Identifying high level assumptions such as need to discharge to a sewer or watercourse with appropriate pollution measures.	NA
Other		☐ Bespoke advice	Any updates to the flood risk assessment report should follow the latest EA surface water map published on February 2025.