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Contact: Flood Risk Management Team
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Date 16 December 2024

Dear Mr Rea

RE: 24/02625/DOC - Details reserved by Condition 3 (detailed designs of a surface water drainage scheme) of Planning Permission 22/02942/OP granted 18 September 2024 - Land at Heath Road, Breachwood Green, Hertfordshire, SG4 8PL

Thank you for your consultation on the above site, received on 27 November 2024. We have reviewed the application as submitted and wish to make the following comments.

We advise that there **isn't sufficient technical information** to support the application in relation to the wording of Condition 3.

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 LLFA technical review includes;

1. We note that the proposed drainage plan provides attenuation storage in a tank underneath the road, in addition to a small pond on the eastern side of the site. This is not in line with the Flood Risk Assessment from the outline application, where it was suggested that a pond on the eastern side could provide sufficient storage. Condition 3 requires detailed designs 'in accordance with the submitted Flood Risk Assessment and Drainage Strategy'. Justification needs to be provided on the use of the tank and why it is not possible to use a pond or other above ground storage to cater for surface water runoff from the site. If the road through the development is to be adopted by the Highways Authority, we recommend you consult with them regarding the proposed drainage strategy as they may not accept the use of a tank under the carriageway.

2. The submitted drainage calculations utilise FSR rainfall data in the simulations, however the outline application utilised FEH13. We no longer accept the use of FSR and so the calculations should be updated using FEH13/22.
3. It is not clear whether an emergency spillway has been provided for the basin on site, as required by point 4 of Condition 3 – this should be clarified.
4. Point 7 of Condition 3 requires a maintenance and management plan to be submitted – this has not been provided. Details on maintenance of non-adopted drainage features is also required by point 9 of Condition 3.
5. Point 8 of Condition 3 requires details on interim and temporary drainage measures during the demolition/construction phase. No information regarding this has been submitted.

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

Jake

Jake Silverton
SuDS and Watercourses Support Officer
Growth & Environment

Annex

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

- Report: Hydraulic Calculations, Chiltern Design Consulting Engineers, August 2024
- Drawing: Site Drainage, Chiltern Design Consulting Engineers, November 2024
- Drawing: External Works Layout, Chiltern Design Consulting Engineers, August 2024
- Drawing: Private Drainage Details (Sheets 1 and 2), Chiltern Design Consulting Engineers, August 2024
- Proposed Site Layout, BHD Ltd, November 2024
- Site Levels, Chiltern Design Consulting Engineers, October 2024

For reference, Condition 3 wording is as follows:

Prior to the commencement of development, in accordance with the submitted Flood Risk Assessment and Drainage Strategy v0.4 (RAB: 2843_FRD), detailed designs of a surface water drainage scheme incorporating the following measures shall be submitted to and agreed upon with the Local Planning Authority. The approved scheme will be implemented prior to the first occupation of the development. The scheme shall address the following matters:

1. *Surface water runoff rates will be attenuated to 0.9 l/s as stated within section 5.4 of the FRA and Drainage Strategy*
2. *Provision of surface water attenuation storage, sized and designed to accommodate the volume of water generated in all rainfall events up to and including the critical storm duration for the 3.33% AEP event plus climate change allowance and 1% annual probability rainfall event plus climate change allowance). A minimum storage volume of 226m³ will be provided in line with section 5.4.1 of the submitted FRA and Drainage Strategy.*
3. *Detailed designs, network modelling calculations and plans of the of the drainage conveyance network in the: a. 3.33% annual probability critical rainfall event plus climate change to show no above ground flooding on any part of the site. b. 1% annual probability critical rainfall plus climate change event to show, if any, the depth, volume and storage location of any above ground flooding from the drainage network ensuring that flooding does not occur in any part of a building or any utility plant susceptible to water (e.g. pumping station or electricity substation) within the development.*
4. *The design of the attenuation basin will incorporate an emergency spillway and any drainage structures will include the appropriate freeboard allowances. Plans to be submitted showing the routes for the management of exceedance surface water flow routes that minimise the risk to people and property during rainfall events in excess of 1% annual probability rainfall event.*
5. *Finished ground floor levels of properties are a minimum of 300mm above expected flood levels of all sources of flooding (including the ordinary watercourses, SuDS*

features and within any proposed drainage scheme) or 150mm above ground level, whichever is the more precautionary.

- 6. Details of how all surface water management features to be designed in accordance with The SuDS Manual (CIRIA C753, 2015), including appropriate treatment stages for water quality prior to discharge.*
- 7. A maintenance and management plan detailing the activities required and details of who will adopt and maintain all the surface water drainage features for the lifetime of the development.*
- 8. Development shall not commence until details and a method statement for interim and temporary drainage measures during the demolition and construction phases have been submitted to and approved in writing by the Local Planning Authority. This information shall provide full details of who will be responsible for maintaining such temporary systems and demonstrate how the site will be drained to ensure there is no increase in the off-site flows, nor any pollution, debris, and sediment to any receiving watercourse or sewer system. Where temporary discharges to a sewer are proposed, written confirmation from the sewer owner that these have been accepted shall be provided. The site works and construction phase shall thereafter be carried out in accordance with the approved method statement unless alternative measures have been subsequently approved by the Planning Authority.*
- 9. Prior to the occupation of the first unit, details shall be provided in respect to the management, inspection, and maintenance of any non-adopted drainage features. The details shall identify the responsible parties and set out how these will be funded and managed and provide a schedule of the proposed inspections and annual maintenance for the lifetime of the development. The plan shall be submitted to and approved in writing with the Local Planning Authority prior to first occupation and the development shall thereafter be maintained at all times in accordance with the approved details.*

Reason: To prevent flooding in accordance with National Planning Policy Framework paragraph 167, 169, and 174 by ensuring the satisfactory management of local sources of flooding 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. To comply with Policies NE7 and NE8 of the North Herts Local Plan 2011 – 2031.