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Contact: Flood Risk Management Team
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Date 19 March 2025

Dear Mr Hunter

RE: 25/00489/DOC - Details reserved by condition 25 (Drainage) of planning permission reference no 19/01669/FP granted 11 February 2025 - Land on the South West Side of Stevenage Road St Ippolyts Hertfordshire

Thank you for your consultation on the above site, received on 24 February 2025. 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 25.

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;

- Results of the infiltration testing have not been submitted.
- Evidence of 24 hour storage in the event of a pump failure has not been provided.

The LLFA technical review includes;

1. Point 1 of Condition 25 requires additional infiltration testing to be carried out. Although the Drainage Statement highlights that further testing has been carried out in 8 locations across the site, it states 'Report to follow'. We require the results and locations of the testing to be provided.

2. We note that as a result of poor infiltration rates in the northern and eastern areas of the site, surface runoff from plots 11-14 needs to be pumped to the infiltration basin in the middle of the site. Water must not leave the site uncontrolled and unrestricted during the design storm when considering the residual risk of failure and must still be safe and suitably mitigated. NPPF Paragraph 181 states it should be ensured that 'flood risk is not increased elsewhere' and that 'any residual risk can be safely managed'. Paragraph 3 and 4 of the PPG (Flood Risk and Coastal Change) contains similar sentiments and Paragraph 5 also states 'consider the consequences of flood risk management infrastructure failing or its design standard being exceeded'. As a result of these policy requirements, we would expect it to be demonstrated that a power failure of 24 hours (meaning the pump would not be operational) in the critical design storm (1% AEP plus climate change) does not increase flood risk to the site or elsewhere. This is as per Ofgem standards that they have 24 hours to restore electricity.

Yours sincerely

Jake

Jake Silverton
SuDS and Watercourses Support Officer
Growth and Environment

Annex

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

- Report: Drainage Statement, Infrastructure Design Ltd

For reference, Condition 25 wording is as follows:

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, FRA & Drainage Strategy (Revision B, August 2023), Flood Risk and Drainage Technical Note (November 2023) considering additional requirements below (I, II) 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. The Drainage Strategy shall include;

- Additional infiltration testing (to BRE 365 standards and at the depth of all the proposed infiltration features) should be carried out to clarify the rates across the site in the strata which will be utilised for discharge.*
- Updated hydraulic calculations (following the updated infiltration testing results) to ensure the scheme can cater for all events up to and including the 1% AEP (plus appropriate climate change event).*

Reason: To ensure that the development achieves a high standard of sustainability and to comply with NPPF Policies of North Herts Council. To comply with Policy NE8 of the Local Plan and Section 14 of the NPPF.