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Contact: Flood Risk Management Team
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Date 30 January 2025

Dear Sarah

RE: 25/00076/DOC – Details reserved by Condition 5 (Site Wide Phasing and Delivery Plan) of outline application 18/01154/OP granted 29 November 2024 – Land North of Higoover Farm to Stotfold Road, Higoover Way, Hitchin

Thank you for your consultation on the above site, received on 15 January 2025. We have reviewed the application as submitted and wish to make the following comments.

We note that Hertfordshire Lead Local Flood Authority (LLFA) did not recommend these conditions. 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.

For reference, Condition 5 (Site Wide Phasing and Delivery) is worded as follows:

'Prior to or concurrently with the submission of the first reserved matters application a Site Wide Phasing and Delivery Plan which accords with the s106 triggers and Transport Mitigation Phasing Strategy has been submitted to and approved in writing by the local planning authority. Thereafter each subsequent reserved matters application for any phase (or part thereof) shall be accompanied by an updated programme or statement of compliance with the approved strategy for subsequent approval by the local planning authority.'

The development shall be carried out in accordance with the approved Phasing Plan unless there are unforeseen events / obstacles to delivery and alternative timing for provision is agreed in writing by the Local Planning Authority.

All reserved matters submissions shall be in accordance with the Site Wide Phasing and

Delivery Plan as approved by the Local Planning Authority, unless otherwise agreed with the Local Planning Authority. Any references to a Phase of the development within this permission shall be taken to be a reference to phases as identified within the Site Wide Phasing and Delivery Plan submitted under this condition.

The Site Wide Phasing and Delivery Plan shall include but not be limited to the sequence of providing the following elements:

- a) Residential development parcels,*
- b) Location of self-build plots,*
- c) A programme for the delivery of public transport infrastructure,*
- d) Major distributor roads/routes within the site, including timing of provision and opening of access points into the site,*
- e) Strategic footpaths and cycleways,*
- f) Primary school (playing pitches), community/neighbourhood centre facilities,*
- g) Strategic foul and surface water features and SUDS,*
- h) Formal and informal public open space, park/square, allotments, parks, NEAP and LEAP,*
- i) Strategic/structural landscaping,*
- j) Strategic electricity, telecommunications and gas networks,*
- k) Infrastructure for the provision of fibre optic cables,*
- l) Environmental mitigation measures,*
- m) Off-site highway improvements'.*

The details to satisfy the discharge of this condition are set out in the separate document titled 'Site Wide Phasing and Delivery Plan' (SWPDP). It is acknowledged that during the course of the determination of this application/condition, it may be necessary to revise the SWPDP arising through consultation with Council Officers, and as such, the SWPDP should be treated as a 'live' document.

The main issues include;

- Site wide phasing and delivery plan does not include information on strategic foul and surface water features and SuDS.

The LLFA technical review includes;

1. We cannot find any information on surface water features or SuDS. In the original planning reference (**18/01154/OP**) implementation of detention basins, swales, and ponds were included as on-site drainage. Within this discharge of conditions, we would expect to see the phasing and delivery of these SuDS features to be compliant with the wording of Condition 5. **Further information is required.**

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: Site Wide Phasing and Delivery Plan, prepared by Rapleys
- Report: Letter Correspondence regarding Highover Farm, prepared by Rapleys, 20 December 2024, REF SRS/503/55/1/LetDOC6