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Contact: Flood Risk Management Team
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Date 22 January 2025

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 reconsultation on the above site, received on 7 January 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 3.

Since our previous response (dated 16 December 2024), the applicant has provided an updated set of documents. This includes a drainage maintenance plan, updated calculations and a plan of the proposed detention basin. The majority of the comments from our previous response have been actioned – however, we have one remaining concern.

We provide the following technical review for your consideration.

The LLFA technical review includes;

1. As we stated in our previous response, point 8 of Condition 3 requires details on interim and temporary drainage measures to be implemented during the demolition/construction phase, to ensure there is 'no increase in the off-site flows, nor any pollution, debris, and sediment to any receiving watercourse or sewer system'. The information provided within the submitted maintenance plan does not provide sufficient detail to meet with the wording of point 8 in Condition 3. Further details are required on the actual temporary drainage measures which will be implemented on site during the construction phase to demonstrate how it will be drained and where

the runoff will be discharged to. We note that it is stated that surface water runoff will be discharged to the sewer system, however there is no details on the drainage measures used to collect and convey the runoff to this discharge point (or how any potential pollution or sediment will be controlled). These measures should be separate to the permanent drainage system.

Informative

As noted in our previous response, the drainage strategy submitted within this application utilises an attenuation tank to provide the majority of the required attenuation storage. In the outline application, it was suggested that the runoff from the site could be catered for by a basin on the eastern side of the site. We understand that the basin has been reduced in size due to the presence of two ash trees in the south-east corner, which have the potential to contain bat roosting features. The trees would have to be felled to accommodate the basin size suggested in the outline application. We note that as long as the applicant has maximised the new size of the basin based off the tree constraints (so that the size of the tank, and so the use of below ground storage, is minimised as far as possible), the change from the approved strategy within the outline application is acceptable.

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: Hydraulic Calculations, Chiltern Design Consulting Engineers, October 2024
- Report: Drainage/SuDS Maintenance Plan and Regime, Chiltern Design Consulting Engineers, January 2025
- Drawing: Detention Basin Details, Chiltern Design Consulting Engineers, January 2025
- Report: Preliminary Ecological Appraisal, ELMAW Consulting, September 2022

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.