

Mr Paul Chaston
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**Lead Local Flood Authority
Growth and Environment
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Contact: Flood Risk Management Team
Email: FRMConsultations@hertfordshire.gov.uk

Date 12 February 2025

Dear Mr Chaston

RE: 24/02713/FP - Installation of Battery Storage System with associated infrastructure, earthworks, landscaping and access - Land at Radwell Bury Farm, Newnham Road, Newnham

Thank you for your consultation on the above site, received on 18 December 2024. We have reviewed the application as submitted and wish to make the following comments.

This is a full application for the Installation of Battery Storage System with associated infrastructure, earthworks, landscaping and access.

We **object** to this planning application in the absence of an acceptable Flood Risk Assessment (FRA) and Drainage Strategy relating to:

- The development is at low risk of surface water flooding and is in very close proximity to an ordinary watercourse. No mitigation measures for the existing surface water flow path on site is provided.
- The proposed SuDS are likely to increase the risk of flooding elsewhere.
- The development is not in accordance with NPPF, PPG or local policies including *Policy NE8: Sustainable drainage systems (Reducing Flood Risk)*

Reason

To prevent flooding in accordance with National Planning Policy Framework paragraphs 181, 182 and 187 by ensuring the satisfactory management of local flood risk, 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.

We will consider reviewing this objection if the following issues are adequately addressed.

1. Evidence appropriate freeboard between the maximum design water level (associated with any source) and proposed external ground levels to the proposed ground floor finished floor levels is required to manage residual risk.
2. Surface water drainage design calculations for the 100% AEP, 3.33% AEP, 3.33% AEP with climate change allowance, 1% AEP and 1% AEP with climate change allowance events should be provided. Screenshot images of the calculations are not acceptable. The applicant has only provided the manhole schedule currently. A drainage layout drawing with appropriate referencing to the drainage element within the design calculations is also required to be provided.
3. Evidence of agreement in principle from the jurisdiction body in relation to the proposed discharge rate and any proposed outfall structure/s discharging to the adjacent ditch is required.

Informative

For further advice on what we expect to be contained within the FRA and/ or a Drainage Strategy to support a planning application, please refer to the Validation List and Proforma on our surface water drainage webpage <https://www.hertfordshire.gov.uk/services/recycling-waste-and-environment/water/surface-water-drainage/surface-water-drainage.aspx> this link also includes HCC's Flood Risk Management policies on SuDS in Hertfordshire. We do expect the Validation List to be submitted to the Local Planning Authority and LLFA to show you have provided all information and the Proforma to the LLFA to summarise the details of the proposed development.

Erection of flow control structures or any culverting of an ordinary watercourse requires consent from the appropriate authority, which in this instance is Hertfordshire Lead Local Flood Authority and the Local Council (if they have specific land drainage bylaws). It is advised to discuss proposals for any works at an early stage of proposals.

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.

Please note if, you the Local Planning Authority review the application and decide to grant planning permission, notify the us (the Lead Local Flood Authority), by email at FRMConsultations@hertfordshire.gov.uk.

Yours sincerely

Raima

Raima Prasad
SuDS and Watercourses Support Officer
Growth and Environment

Annex

The following documents have been reviewed:

- Flood Risk Assessment and Surface Water Drainage Strategy, by Ridge, 15 November 2024, reference: 5024440-RDG-XX-XX-RP-C-0501 and revision no. P03.