

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 is provided.

There is no connecting overland flow route to the southern side of Newnham Road. The 'Low risk' surface water flooding area shown within the site is therefore from either direct rainfall, or overland flows from the west (which drain towards the site from the arable catchment). We have provided a cut-off ditch along the western boundary of the site. Furthermore, the direct rainfall onto the proposed site will be captured by the new surface water collection features (filter drains etc) and stored within the two proposed attenuation basins, with a controlled rate from the new outfall to the existing watercourse.

We do not believe any measures are proposed which will significantly impact the rate or volume of surface runoff which is directed into the existing watercourse. There is even the opportunity to provide check dams along the cut off ditch to slow the flow further before it enters the existing ditch. With regards to any mitigation measures for new development, all proposed equipment would be raised above proposed ground levels by a minimum of 150mm, so that the risk of flooding or damage to new infrastructure from surface water is removed.

The proposed SuDS are likely to increase the risk of flooding elsewhere.

We do not agree with this statement. Please advise further how the proposed SuDS features are likely to increase the risk of flooding elsewhere, given they are sized to accommodate the most onerous design storm (1% AEP with climate change) as specified in the LLFA guidance?

The development is not in accordance with NPPF, PPG, or local policies including Policy NE8: Sustainable drainage systems (Reducing Flood Risk).

In the North Herts Local Plan, Policy NE7 relates to 'Reducing Flood Risk' and Policy NE8 relates to 'Sustainable drainage systems'. As the comment above references both reducing flood risk and sustainable drainage, we are unsure which aspect of either policy the LLFA is referring to. We believe the proposed scheme is compliant with both policies. If there is a specific concern which has not been allayed by our comments above, please can the LLFA state what this relates to.

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.

Please refer to 'Appendix D – InfoDrainage Results and Outputs' which confirms the design freeboard (300mm) for the attenuation basins.

This information has been included within the Appendices of the Flood Risk Assessment and Drainage Strategy (report submitted in three parts with the planning application).

2 Surface water drainage 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 elements within the design calculations is also required to be provided.

Please refer to the appendices to the FRA and Drainage Strategy report, which include all rainfall events which have been modelled, a drainage layout drawing, and references to the drainage network.

This information has been included within the Appendices of the Flood Risk Assessment and Drainage Strategy (report submitted in three parts with the planning application).

We have only provided a screenshot of the greenfield runoff calculation in the report body itself for ease of reference. All other calculations are provided in the appendices. We can alternatively produce a PDF and include the greenfield calculations in the appendices should this be the preference of the LLFA.

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.

Having reviewed the Bedford Group of Drainage Boards website, as the site is located within North Hertfordshire District, our understanding is that any approval on the new outfall structure and discharge rate is the responsibility of Hertfordshire County Council as the LLFA (please refer to the below screenshot).

LLFA Application Forms-

In the areas of Central Bedfordshire and Milton Keynes, the Consenting role is being undertaken by the Bedford Group of Drainage Boards under the Flood and Water Management Act Section 13 (4).

[Central Bedfordshire Council Consent Application Form](#)

[Milton Keynes City Council Consent Application Form](#)

Any LLFA not listed above carry out their own consenting.

Please download & submit the completed form, together with the relevant fee (where applicable – see note 2, Page 5) and supporting documentation via the Submit Form button at the end of the form.

Please direct any queries to consent@idbs.org.uk or call 01234 767995.

North Hertfordshire District	
NAME	North Hertfordshire District
AREA_CODE	DIS
DESCRIPTIO	District
FILE_NAME	HERTFORDSHIR E_COUNTY
NUMBER	22.00
NUMBERS	22.00

Please could you confirm in what form the agreement in principle needs to be provided, and who is required to provide this from the LLFA?