

Naomi Reynard
Local Planning Authority
North Herts Council
PO Box 10613
Borehamwood
Hertfordshire
WD6 1WA

**Lead Local Flood Authority
Growth and Environment
Hertfordshire County Council
Post Point CHN 215
Farnham House
Six Hills Way, Stevenage
HERTFORDSHIRE, SG1 2ST
www.hertfordshire.gov.uk**

Contact: Flood Risk Management Team
Email: FRMConsultations@hertfordshire.gov.uk

Date 25 February 2025

Dear Naomi

RE: 24/02889/FP - Residential development of 281 dwellings and associated roads, parking, realignment of Back Lane, drainage, landscaping, open space, servicing facilities and associated works - Land at Roundwood Back Lane Graveley SG1 6GJ

Thank you for your consultation on the above site, received on 10 January 2025. We have reviewed the application as submitted and wish to make the following comments.

This is a full planning application, the applicant is proposing a construction of 281 dwelling within approximately 11.4 ha of total site area including roads, landscaping, open space etc.

This application has the potential to increase the risk of flooding from the proposed drainage network.

We **object** to this planning application in the absence of an acceptable Flood Risk Assessment or drainage strategy:

- The development is not in accordance with NPPF, PPG or North Herts local policies including Policy NE8: Sustainable drainage system (Reducing Flood Risk) and Policy NE9: Water quality and environment.

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 issues highlighted on the accompanying Planning Application Technical Response document are adequately addressed.

The main points of this are;

- 1) The applicant has provided the evidence of the agreement from Thames water for discharging to their asset and quantity of approved discharge information dated 26 October 2021. However, the approval is too old to be accepted and that was for 292 dwellings associated with the case 23/02492/FP. Now the number of dwellings has been amended to 281 and new consent is required from Thames Water.
- 2) Drawings of cross sections and long sections of all the network and structures such as ponds and swales need to be supplied.
- 3) The Applicant must use CV values of 1.0 in their hydraulic calculations. Have used CV values of 0.75 and 0.84 for summer and winter respectively. Considering lower CV values may under predict the flood in the calculations.
- 4) The applicant must provide hydraulic calculations for 50% AEP rainfall event. Furthermore, half-drain times should be provided for all storage features.
- 5) Exceedance of the design 1% AEP rainfall event plus climate change (or failure of the drainage network) must be shown on a drawing, minimising impacts to people and property. This drawing will include proposed external ground levels, finished floor levels and any designed slopes on impermeable surfaces such as roads or car parks.
- 6) Appropriate easements (to the adopting authority standard) to SuDS features (Ponds and Swales) should be shown on a drawing, this will be a minimum of 3m.
- 7) Vehicular access route and off-road parking needs to be provided to ponds and swales.
- 8) The existing greenfield runoff rates considered a developable area of 8.14 ha whereas the total site area is approximately 11.4 ha. It should be clearly demonstrated that landscaped areas will not still drain to the proposed drainage features. Greenfield runoff volumes are missing in the provided FRA.

Informative;

- 9) The Applicant has not demonstrated consideration of rainwater reuse. We highly recommend that rainwater harvesting and reuse, such as in SuDS planters and/or water butts, is considered throughout the development.
- 10) Due to the likely long duration build out time (including phased development proposals), supporting drainage calculations and drawings are required to show a timeline of how temporary measures will be put in place to protect the water environment and any newly built SuDS features. This will include any temporary water quality and water quantity flow control devices which are required.

- 11) As it is a phased development, a surface water management and construction phasing plan are required. This must show how each phase can be provided independently (in terms of surface water drainage) and how any infrastructure which it relies on will be constructed prior to any housing or commercial development.
- 12) A high-level assessment of how water quantity and water quality will be managed during the construction phase is required. Identifying high level assumptions such as need to discharge to a sewer with appropriate pollution measures.

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.

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

Veeranna

Bhukya Veeranna
SuDS and Watercourses Support Officer
Growth and Environment

Annex

The following documents have been reviewed.

- Report: Flood Risk Assessment by SLR Consulting Limited (SLR) dated 6 December 2024 revision 4.
- Document: Appendix F Surface water calculations by SLR Consulting Limited (SLR) date 5 December 2024.
- Document: Appendix C Ground Investigation report by SLR Consulting Limited dated 11 January 2022.
- Document: Planning Statement by Stantec dated 24 December 2024 revision 2.