

Steve Fraser-Lim
Local Planning Authority
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Lead Local Flood Authority
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Contact Flood Risk Management Team
Email FRMConsultations@hertfordshire.gov.uk

Date 27 June 2024

Dear Mr Fraser-Lim

RE: 3/24/0966/OUT - Land North of A507 and West of A10 Buntingford

Thank you for your consultation regarding the above application (received 29 May 2024) for an outline planning application for development of up to 600 dwellings (C3), elderly accommodation (C3), Mixed Use Local Centre (including flexible use E, F and Sui Generis), First School, informal and formal open space, associated works and infrastructure including a new access from the A507 and pedestrian bridge over the A10, with all matters reserved except access.

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

- Further details on the existing surface water flow routes on the site to show that the site is not at risk of flooding from elsewhere and the flood risk will not increase from the proposed development.
- The development not complying with NPFF and East Herts policies WAT1 (Flood Risk Management) and WAT5 (Sustainable Drainage).

Reason

To prevent flooding in accordance with National Planning Policy Framework paragraphs 173, 175 and 180 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 issues are:

- Further consideration of the overland flow path and how development will be removed from the 1% AEP plus 40% climate change flood extents as per the sequential approach.
- Evidence that a drainage strategy can be achieved either by providing infiltration testing (Plan A) or further information on the existing drainage network and its connection to the wider watercourse network (Plan B).
- Further consideration of the drainage hierarchy, including further information on a connection to an alternative watercourse rather than discharging to a surface water sewer.
- How each area will be drained for each part of the masterplan so that each development phase can be built independently of each other.

Informative

For further advice on what we expect to be contained within the FRA to support a planning application, please refer to our Developers Guide and Checklist 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 policies on SuDS in Hertfordshire.

In December 2022 it was announced FEH rainfall data has been updated to account for additional long term rainfall statistics and new data. As a consequence, the rainfall statistics used for surface water modelling and drainage design has changed. In some areas there is a reduction in comparison to FEH2013 and some places an increase (see [FEH22 - User Guide \(hydrosolutions.co.uk\)](https://www.hydrosolutions.co.uk/FEH22-User-Guide)). Both FEH 2013 and 2023 are currently accepted. 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

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;

- Flood Risk Assessment and Drainage Strategy, Jubb Consulting Engineers Ltd, May 2024