

Steve Fraser-Lim
Local Planning Authority
East Herts District Council
Wallfields
Pegs Lane
Hertford
Hertfordshire
SG13 8EQ

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

Contact SuDS and Watercourses Team
Email FRMConsultations@hertfordshire.gov.uk

Date 23 June 2025

Dear Mr Fraser-Lim

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

Thank you for your re-consultation regarding the above application (received 10 June 2025) 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.

Since our previous response, the applicant has provided a document to summarise the changes which have been made to the drainage strategy since the application was first submitted. We understand that there have been no changes to the FRA or drainage strategy since our last response (dated 11 February 2025) and so we maintain the same position (no objection).

In separate email correspondence, the applicant has also suggested some changes to the conditions we recommended in our last response (dated 11 February 2025). We would recommend the following conditions if you are minded to grant permission (noting that there are some small adjustments when compared to the conditions from the 11 February 2025 letter):

Condition 1

Prior to or in conjunction with the submission of each reserved matters application, in accordance with the submitted FRA and Drainage Strategy (23161-FRADS(N)-01 v5, May 2024) and Applicant Response to Hertfordshire County Council LLFA Consultation Response (24 January 2025), detailed designs of a surface water drainage scheme incorporating the following measures shall be submitted to and agreed 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:

- I. Detailed infiltration testing in accordance with BRE Digest 365 (or equivalent) along the length and proposed depth of the proposed infiltration feature/s,

or

If infiltration is proven to be unfavourable, then surface water runoff rates will be attenuated to QBAR as stated within section 6.2 of the FRA and Drainage Strategy. The discharge location for surface water runoff will be confirmed to connect with the wider watercourse network.

- II. 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 (1 in 30 year) and 1% AEP (1 in 100) rainfall events (both including allowances for climate change).
- III. Detailed designs, modelling calculations and plans of the of the drainage conveyance network in the:
 - 3.33% AEP (1 in 30 year) critical rainfall event plus climate change to show no flooding outside the drainage features on any part of the site.
 - 1% AEP (1 in 100 year) critical rainfall plus climate change event to show, if any, the depth, volume and storage location of any flooding outside the drainage features, 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. It will also show that no runoff during this event will leave the site uncontrolled.
- IV. The design of any infiltration or attenuation basin will incorporate an emergency spillway and any drainage structures include 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% AEP (1 in 100) rainfall event plus climate change allowance. This will include surface water exceedance which may enter the site from elsewhere in excess of the 1 in 100 (1% AEP) rainfall event.
- V. 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.
- VI. 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.
- VII. A maintenance and management plan detailing the activities required and details of who will adopt and maintain the all the surface water drainage features for the

lifetime of the development. This will also include the ordinary watercourse and any structures, such as culverts, within the development boundary.

Reason:

To prevent flooding in accordance with National Planning Policy Framework paragraphs 181,182 and 187 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.

Condition 2

Prior to, or in conjunction with any Reserved Matters application, detailed hydraulic modelling of the surface water flow paths shall be carried out and submitted to and approved in writing by the Local Planning Authority. The modelling shall demonstrate that the development will not result in an increase in flood risk elsewhere, incorporating all watercourses, upstream exceedance flow routes and flows through the site. The modelling should include proposed ground levels and site layout and demonstrate that the development will not increase flood risk for all events up to and including the 1% AEP (1 in 100 year) plus climate change event. It should also demonstrate that any culverts have capacity for both the development discharge and overland flow paths.

Reason: To ensure that the development achieves a high standard of sustainability and ensure the flood risk is adequately addressed for each new dwelling and not increased in accordance with NPPF and Policies of East Herts District Council.

Condition 3

Each phase of the 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. The site works and construction phase shall thereafter be carried out in accordance with approved method statement, unless alternative measures have been subsequently approved by the Planning Authority

Reason: To prevent flooding and pollution offsite in accordance with the NPPF.

Condition 4

Each phase of the development hereby approved shall not be occupied until details of the maintenance and management of the sustainable drainage scheme have been submitted to and approved in writing by the Local Planning Authority. The drainage scheme shall be implemented prior to the first occupation of the development hereby approved and thereafter managed and maintained in accordance with the approved details in perpetuity. The Local Planning Authority shall be granted access to inspect the

sustainable drainage scheme for the lifetime of the development. The details of the scheme to be submitted for approval shall include:

- I. a timetable for its implementation.
- II. details of SuDS feature and connecting drainage structures and maintenance requirement for each aspect including a drawing showing where they are located.
- III. a management and maintenance plan for the lifetime of the development which shall include the arrangements for adoption by any public body or statutory undertaker, or any other arrangements to secure the operation of the sustainable drainage scheme throughout its lifetime. This will include the name and contact details of any appointed management company.

Reason: To ensure that the development achieves a high standard of sustainability and ensure the flood risk is adequately addressed for each new dwelling and not increased in accordance with NPPF and Policies of East Herts District Council.

Condition 5

Prior to first use of each phase of the development a detailed verification report, (appended with substantiating evidence demonstrating the approved construction details and specifications have been implemented in accordance with the surface water drainage scheme), has been submitted to and approved (in writing) by the Local Planning Authority. The verification report shall include a full set of “as built” drawings plus photographs of excavations (including soil profiles/horizons), any installation of any surface water drainage structures and control mechanisms.

Reason: To ensure that the development achieves a high standard of sustainability and ensure the flood risk is adequately addressed for each new dwelling and not increased in accordance with NPPF and Policies of East Herts District Council.

Informative

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;

- FRA and Drainage Strategy Update, Jubb Consulting Engineers Ltd, May 2025