Growth & Environment

Hertfordshire

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Contact Anna Mierzejewska
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Date 12 October 2023

Dear Amit

RE: 3/23/1447/OUT – Land East of the A10, Peasmead, Buntingford, SG9 9SF

Thank you for your consultation on the above site, received on 1 August 2023. We have reviewed the application as submitted and wish to make the following comments.

We understand the applicant seeks an outline planning permission for the development of 350 dwellings, with up to 4,400 sqm of commercial and services floorspace (Use Class E and B8) and up to 500 sqm of retail floorspace (Use Classes E) and other associated works including drainage, access into the site from the A10 and Luynes Rise (but not access within the site), allotments, public open space and landscaping at Land East of the A10, Buntingford, Hertfordshire.

We note a Flood Risk Assessment and Outline Drainage Strategy (FRA&ODS) was submitted as part of the application, and there are no significant sources of flooding affecting the site, although the Environment Agency risk of surface water flooding map indicates an overland flow path along the north-eastern boundary of the site that shows areas being at low to medium risk.

We understand the proposed ODS for this development is to discharge all surface water runoff to a public surface water sewer which drains into an open watercourse away from the site. We note the infiltration testing to BRE Digest 365 was undertaken on site in 2014. Both, the trial pit records, and the subsequent geotechnical testing indicated Clay was present across the area of the proposed development. The tests have proved infiltration to be unfeasible. We understand the surface water flows will be attenuated within two attenuation basins, one of which discharging via gravity and the other via pumping solution into the public sewer. We note other SuDS features are also proposed to be provided, such as conveyance swales and permeable paving. We also note the outline surface water drainage plans were provided, along with the relevant MicroDrainage (MD) modelling results.

We **object** to this planning application in the absence of an acceptable Drainage Strategy and supporting information relating to:

How the drainage hierarchy is followed to include the first element which is the rainwater re-use.
How the proposed drainage network including the pumped solution will not adversely affect the flood risk on and off the site.
How the proposed drainage network will be maintained through the lifetime of the development.

Reason
To prevent flooding in accordance with National Planning Policy Framework paragraph 167, 169 and 174 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. The applicant should provide technical justification of whether or not the first element of the drainage hierarchy, which is rainwater reuse, is possible to provide on the proposed development site. The ODS states this is currently not proposed, although suitable given the proposed end use. **Further information is required to demonstrate the reason of its exclusion from the proposed design.**

2. The MD drainage network has been modelled using the FEH99 rainfall data. This should be recalculated using the most recent FEH rainfall data. **Further information is required.**

3. The applicant is required confirm whether an urban creep was accounted for in the given contributing impermeable areas. **Further information is required.**

4. The surface water drainage plan should be resubmitted. All details should be consistent with the data shown in the report and the MD modelling results (e.g. right impermeable areas). SuDS design should be in accordance with the Ciria SuDS Manual C753. **Further information is required.**

5. Surface water pumping stations should only be used where there is no other practicable sustainable method of surface water drainage and an adequate exceedance flood route is provided in the event of failure of the pumping station. Any pumping station should be designed in accordance with the latest Design and Construction Guidance (DCG). A safe and reasonable vehicular access should be provided to the pumping station at all hours for the purpose of repair and maintenance. The relevant storage provision should be provided as indicated in the DCG to account for the residual risk of the pump breaking down. The surface water flooding outline shown on the Environment Agency mapping is close to the location of the pumping station. This should be taken into account as described in the DCG document.

6. An exceedance flow path plan should be provided in the event of the drainage network failure. This should be accounted for the flow exceeding the 1 in 100 year plus climate change event and indicated on a plan showing finished site levels. **More information is required.**

7. The maintenance schedule provided lacks the inclusion of any remedial actions for the proposed surface water drainage elements. Additionally, not all SuDS and surface water drainage elements listed were relevant to the proposed ODS and some were missing. **More information is required.**

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.

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.

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)). Any new planning applications that have not already commissioned an FRA or drainage strategy to be completed, should use the most up to date FEH22 data. Other planning applications using FEH2013 rainfall, will be accepted in the transition period up to the 1st April 2023. This includes those applications that are currently at and advanced stage or have already been submitted to the Local Planning Authority. For the avoidance of doubt the use of FSR and FEH1999 data has been superseded by FEH 2013 and 2022 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, you should notify the us, the Lead Local Flood Authority, by email at FRMConsultations@hertfordshire.gov.uk.

Yours sincerely

Anna Mierzejewska
SuDS and Watercourses Support Officer
Growth & Environment

Annex

The following documents have been reviewed, which have been submitted to support the application;

Flood Risk and Outline Drainage Strategy by WSP, Ref: 10537-WSP-SW-XX-RP-C-0002, rev. P02, dated July 2023
Geo-Environmental and Geotechnical Preliminary Risk Assessment by WSP, Ref: 70088938-PRA, Rev. v3, dated May 2023
Consultee letter: Thames Water, Ref: 71251, dated 22 August 2023.
Consultee letter: Environment Agency, Ref: NE/2023/136031/01, dated 21 August 2023.