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SG13 8EQ

**Lead Local Flood Authority**  
**Post Point CHN 215**  
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Contact Andy Hardstaff  
Email [FRMConsultations@hertfordshire.gov.uk](mailto:FRMConsultations@hertfordshire.gov.uk)

Date 8 February 2024

Dear Hannah,

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

Thank you for your re-consultation on the outline planning application for the above site, received on 28 November 2023 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 have reviewed the additional information submitted and wish to make the following comments.

We note an updated Flood Risk Assessment and Outline Drainage Strategy (FRA&ODS) was submitted in response to our previous comments, dated 12 October 2023. In addition to that a Flow route exceedance plan and a SuDS Maintenance and Management Plan were provided dated 15 November and 11 November respectively. Whilst this mostly addresses the comments we raised, on further inspection there is a significant technical issue still to be investigated for this Outline application.

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

- The development as proposed may increase the risk of flooding elsewhere from the drainage strategy which has no proven location to discharge surface water runoff to.
- The development is not currently complying with NPPF, PPG or East Herts District Plan (2018) local policies:
  - WAT5 - Sustainable Drainage
  - WAT3 - Water Quality and the Water Environment
  - WAT4 – Efficient Use of Water Resources

## 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.

**Currently the outline application has not evidenced that there is a viable location to discharge the surface water runoff from the proposals. The greenfield runoff rates and volumes are also not agreed, and Thames Water has stated that there is no capacity to discharge to the surface water sewer at the proposed manhole.**

On inspection of the technical note and the masterplan that is included, the proposal discounts the discharge of surface water runoff to an adjacent watercourse. It is stated that it would be difficult due to third party access. Instead, the applicant proposes the pump the water away from the river to a location where there is a cul-de-sac turning point (Peasmead). This is a connection point suggested by Thames Water on a pre-application enquiry, however we note that Thames Water have since commented that there is not sufficient capacity for the discharge proposed at this location.

We have looked at the utility survey supplied from Thames Water and note that the applicant would have to gain permission from householders (between 7 and 8 Peasmead, Buntingford) to lay new pipes through their garden, close to buildings to access the manhole in the highway of the cul-de-sac. The water would then enter a surface water sewer (stated as allowing for future flows from this development site) from Peasmead to Luynes Rise and then via Barley Croft to an outlet into the River Rib. A distance of approximately 400m through a housing estate. It is unclear why a connection through third party land in Barley Close (past two houses) cannot be utilised which is only around 50m from the edge of the site. There is no evidence of the design or capacity of the existing sewers. It is also unclear why a connection to the River Rib can not be investigated from the site through Watermill industrial estate road or via land owned by Thames Water at the sewerage treatment works. We highlight that water from the 28.9ha site discharging to a housing estate sewer system that was not designed to accommodate this water would need substantial upgrades to ensure that it could meet the new design standards for drainage and not increase the risk of flooding to the existing properties.

We also note that there is a storm overflow indicated on the Thames Water utility survey which may run directly past the site to the new sewer treatment works to the south.

It is also unclear if there has been any intrusive investigation and CCTV survey to see if the "ditches" on the site discharge to any culvert or surface water sewer out from the site. The applicant states they have not found any outfalls of these ditches. If any of the on-site ditches can be utilised this would mean that a pumped outfall may not be required. The applicant has also stated that the existing ditches would be used to channel water to the River Rib should the proposed surface water pump fail. This statement indicates that the ditches within the site are likely connect to the River Rib so should be investigated as a discharge location.

We also have concerns over the calculation of greenfield runoff rates. We request a catchment map to show how they have been calculated and demonstrate that the green land to the west of the A10 is not included.

A document and drawing showing a drainage catchment plan with anticipated required drainage phasing be supplied. This would include high-level information on any temporary measures required on discharge rates and connections required during a longer term build out plan. Each phase of development should have its own independent drainage scheme which can be implemented separately.

One large basin to deal with the majority of surface water runoff should be reviewed, a SuDS design guide should highlight the opportunities for smaller phased SuDS storage features and source control storage that can be provided across the site. A high-level indication of how the storage can be split across the site should be provided and also the additional development space required to include swales adjacent estate roads mentioned as possible in the site. Following this assessment, it should be investigated if the housing density and type would still be achievable with a masterplan.

Evidence of a secured discharge location as a “backup” option while further investigations are undertaken (for example, gaining relevant permissions to cross third-party land) would resolve our outstanding major concern.

**The LLFA would welcome a meeting to discuss the proposals at this location with the Local Planning Authority and Thames Water.**

#### Informative only

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 \(hydrosolutions.co.uk\)](https://www.feh.gov.uk/FEH22-User-Guide)). Any new planning applications should use the most up to date FEH13 or FEH22 data. 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](mailto:FRMConsultations@hertfordshire.gov.uk).

Yours sincerely

**Andy Hardstaff**  
**Head of Flood Risk Management**  
Lead Local Flood Authority  
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.