

Mr Robert Brigden
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**Lead Local Flood Authority
Growth and Environment
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Contact: Flood Risk Management Team
Email: FRMConsultations@hertfordshire.gov.uk

Date 27 March 2025

Dear Mr Brigden,

RE: 5/2024/2271 – Land Off Sandridgebury Lane And Between The Railway And Harpenden Road

Thank you for your consultation on the above site, received on 06 March 2025. We have reviewed the application as submitted and wish to make the following comments.

This is a Hybrid planning application for relocation and replacement of existing playing fields and erection of pavilion annex (full details); and Construction of up to 1000 new homes (Use Class C3) to include a mix of market housing, affordable housing, age restricted specialist accommodation for the elderly, adult disability service units; a care home (Use Class C2); a local centre (Use Classes E and F); a primary school (Use Class F); the laying out of green infrastructure including habitat creation; drainage infrastructure; earthworks; pedestrian and cycle routes; new means of access and alterations to existing accesses.

We have reviewed the documentation as submitted. This letter (Part 1) relates to the outline planning application for up to 1000 houses. Due to the detail and size of the site, Part 2 (playing fields) will be sent separately.

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

- The development is at risk of surface water flooding.
- The proposed SuDS are likely to increase the risk of flooding elsewhere.
- The development is not in accordance with NPPF, PPG or St Albans local policies including FR1, FR3, CS26 and LP29.

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 below are adequately addressed.

Flood Risk Matters

Flood Risk on Site:

We are foremost concerned that the Flood Risk Assessment and Drainage Strategy utilises the old flood map for planning data. Whilst we note that the data is only newly available, the risk of surface water flooding using the new mapping is greater and should be considered (as the best available data). The attenuation / infiltration basins are situated within an area of high-risk flooding on site and likely to be inundated with overland flows, compromising their effectiveness. No infrastructure should be situated within the surface water flow path. On this point, due to the lack of outline masterplan, we cannot clarify whether residential properties are situated within the surface water flow path. **Further information is required.**

Residual Risks and Mitigating Flood Risk:

At present, the site has not considered mitigating the flow path on site. There is no evidence for the Sequential Approach being undertaken properly. Whilst we note that Table 5.12.1 in the FRA outlines the percentage of proposed built development area, there is no clear avoidance > mitigate > resist for managing the surface water flow path through the site. Additionally, the finished floor levels are unclear. There is no justification as to why the 150mm ground levels have been used instead of the 300mm design flood level, as the site is at flood risk. **Further information is required.**

Site Specific Modelling:

Due to the nature of this site (large residential development) and the risk of surface water on site, we would recommend that site specific surface water mapping is undertaken. This should include a model report with all rainfall return period extents (3.33% AEP, 1% AEP plus appropriate climate change and 0.1% AEP event) utilising the correct parameters (CV value of 1, FEH2013 / FEH22 and climate change allowance for the 3.33% and 1% AEP events). **Further information is required.**

Greenfield Runoff Rates:

We cannot locate the calculations for the greenfield runoff rates and volumes. All runoff rates and volume calculations should utilise FEH2013 or FEH2022 rainfall data. Additionally, post-development rates need to be laid out clearly. At present, it is unclear what is considered as a post-development runoff rate and volume. **Further information is required.**

Drainage Matters

Discharge rates:

We are significantly concerned that the discharge rates for the proposed SuDS features are very high. The outflow rates on some of the basins are between 100 and 340 l/s. We would like to clarify that this would not be acceptable. Additionally, the higher basin flows are at the beginning of the run, potentially overloading the system. **Further information is required.**

Water Quality and Four Pillars of SuDS:

We understand that a Simple Index Approach has been submitted, there is limited information for pollutants and mitigation indices. We would require all SuDS features on site to be included within the Simple Index Approach. **Further information is required.**

For Water Quantity, further above-ground source control SuDS require consideration (i.e. rain gardens, enhanced tree pits, SuDS planters/water butts and permeable paving). The SuDS hierarchy should be explored in full, including source control features, with commitments to this at outline, even just through justification. **Further information is required.**

Full Network Calculations:

Whilst we understand this is an outline application, a site this size requires full network calculations utilising the correct parameters (FEH2013/FEH22, CV value of 1, appropriate climate change allowance for the 3.33% and 1% AEP events and urban creep of 10%). This is to evidence that the drainage network will operate successfully. **Further information is required.**

Drainage Strategy Layout Drawings:

We require further detail on the surface water drainage strategy. We need to see the proposed house locations to ensure the surface water flow path does not conflict with the development. Additionally, an updated drawing to highlight that the basins are not within the flood risk areas would need to be provided for review. **Further information is required.**

Exceedance Flow Routes:

The exceedance flow routes currently show water flowing over areas that we believe to be proposed for residential development. Exceedance flow routes should be diverted away from all vulnerable infrastructure. **Further information is required.**

Site Constraints:

We are concerned that for the size of the site, there are a limited number of sustainable drainage solutions in the residential plots. The green space is taken up by basins but there is a lot of empty space around the site where source control SuDS should be fully

considered to provide flood risk and multifunctional benefits. **Further information is required.**

Phasing Documentation:

We anticipate the delivery of the development is likely to be phased. Please could outline phasing documentation be submitted at this stage. **Further information is required.**

Construction Management Plan:

This application has not included any information on a high-level construction management plan. This needs to be provided. **Further information is required.**

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

Ellie

Ellie Miller
SuDS and Watercourses Support Officer
Growth and Environment

Annex

The following documents have been reviewed.

- Report: Flood Risk Assessment and Drainage Strategy, prepared by PJA, 07 February 2025, REF 05920-FRA-002 REV P4
- Report: Infiltration Testing and Groundwater Monitoring, prepared by Geo Environmental Group, July 2024, REF GEG-24-821/IT
- Drawing: Drawing Name, by who, full date, reference and revision number.