

Mr Matthew Roberts
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**Lead Local Flood Authority
Growth and Environment
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Contact: SuDS and Watercourses Team
Email: FRMConsultations@hertfordshire.gov.uk

Date 1 August 2025

Dear Mr Roberts

RE: 25/1020/OUT – Outline Planning Application for up to 256 Homes (C3 Use Class) (including affordable and self/custom build housing), housing with care (C2 use class), a children's home (for looked after children) (C2 use class) together with associated access (including off-site highway works), parking, open space and landscaping (appearance, layout, landscaping and scale as reserved matters) – Land East of Oxhey Lane, Carpenders Park

Thank you for your consultation on the above site, received on 26 June 2025, for an outline planning application. We have reviewed the application as submitted and wish to make the following comments.

It is understood that the outline application is seeking planning permission for access only, with all other concerns to be dealt with at the reserved matters stage. The proposed development is mixed-use to include the provision of up to 256 new homes, some sheltered accommodation and a children's home.

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

- The development is at risk of fluvial flooding from a Main river and also surface water flooding generated from runoff from land.
- Potential increase in flood risk as a result of the development and its proposed drainage scheme.
- **We advise that you as Local Planning Authority, ensure that this application passes the Sequential Test.** A Sequential Test for this application has been submitted and is stated to 'pass'. However, we do not believe that the sequential test has been adequately completed.
- The development is not in accordance with NPPF, PPG, National Standards for Sustainable Drainage Systems (June 2025) or Three Rivers local policies including

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 LLFA concerns are adequately addressed. A summary of concerns has been indicated below, however, ALL concerns to be addressed have been detailed in a separate checklist document which should be reviewed alongside this letter.

1. The FRA and drainage strategy are in direct contravention with the new National Standards for Sustainable Drainage (June 2025) as no measures are in place to ensure the minimum 5mm of rainfall interception is achieved and source control measures are not duly considered.
2. The FRA also does not adequately meet the water quantity, quality, biodiversity and amenity requirements. The drainage strategy proposed relies upon a traditional 'pipe to pond' scenario, with no SuDS management train indicated on the drainage strategy.
3. There is a significant surface water flow path running through the site. The illustrative masterplan indicates that buildings will be located in this surface water flow path. The existing extents of flooding for both present day and climate change scenarios should be presented in context with the site's boundary. As this flow path is likely generated from land within the site's boundary, this flow path would not be present post-development as it is assumed that rainfall and surface water will be captured and formalised within the provided surface drainage infrastructure. The applicant should address this and confirm evidence for mitigation within the proposals.
4. A Sequential Test has been undertaken by the applicant for which the applicant believes to 'pass'. However, we do not consider that the sequential test has been properly applied, and further consideration is required.
5. There are concerns that the FRA has not adequately addressed all source of flood risk including but not limited to the Hartsbourne Stream Flood Storage Area, reservoir, sewer, groundwater and historic flooding.
6. The drainage location hierarchy has not been followed. Infiltration as a source of surface water disposal has been discounted without undertaking any infiltration testing. In addition, rainwater harvesting has not been fully considered.
7. The southern part of the site is proposed to discharge to Hartsbourne Stream (main river) however there is no evidence of agreed access provided. The northern part of

the site is proposed to discharge to a surface water sewer on Carpenders Avenue but no agreement in principle from Thames Water has been provided.

8. Emergency vehicular access lies outside of Flood Zones 2 and 3, but within an area of low surface water flood risk. Access to wider health and welfare facilities should be addressed.
9. Some simulations have used FSR rainfall rather than FEH13/FEH22 data. CV values of 0.75 have been used. We require a CV value of 1 to be used.
10. Modelling calculations have only been provided for the critical 1% AEP plus 40% climate change. Drainage calculations for all storm durations and return periods (e.g. 100%, 50%, 3.33% plus 35% climate change, 0.1% AEP) must be provided. Freeboard levels have not been considered and the FRA's calculated QBAR has not been met based on the simulations provided, thus proposals currently exceed greenfield rates and would therefore increase flood risk off-site. It is also uncertain if 10% urban creep has been applied to the simulations.
11. Causeway Flow calculations have applied an additional 20m³/ha of storage to each storage structure. This should be set to 0m³/ha.
12. Current attenuation calculations are considered to be underestimates and thus it is not confirmed if the site can accommodate the actual required storage.
13. Greenfield discharge rates within the submitted documents are inconsistent and are believed to be too high. These should be reviewed and clarified. Greenfield volume calculations have not been undertaken or evidenced.
14. The FRA does not consider which adoption authorities could adopt each SuDS feature.

Informative

For further advice on what we expect to be contained within the FRA and/ or a Drainage Strategy to support a planning application, please refer to the Validation List and Proforma 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 Flood Risk Management policies on SuDS in Hertfordshire. We do expect the Validation List to be submitted to the Local Planning Authority and LLFA to show you have provided all information and the Proforma to the LLFA to summarise the details of the proposed development.

Both FEH13 and FEH22 are currently accepted to support drainage modelling calculations. 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

Lizzie

Lizzie Todd-Davies
SuDS and Watercourses Support Officer
Growth and Environment

Annex

The following documents have been reviewed:

- Report: Covering Letter 923061, Boyer, 21 May 2025, 24.5080.
- Report: Flood Risk Assessment & Drainage Strategy, Ardent Consulting Engineers, 25 March 2025, 2403160-ACE-XX-XX-RP-C-0301
- Report: Sequential Test Land East of Oxhey Lane Carpenders Park, Boyer, 21 May 2025, 24.5080, Revision 3.
- Report: Design & Access Statement, Pegasus Urban Design, March 2025, P24-2204.
- Report: Planning Statement Land East of Oxhey Lane Carpenders Park, Boyer, 21 May 2025, 24.5080, Revision 4.
- Drawing: Drainage Strategy (Sheet 1), Ardent Consulting Engineers, 12 March 2025, 2403160-ACE-XX-XX-DR-C-0601.
- Drawing: Drainage Strategy (Sheet 2), Ardent Consulting Engineers, 12 March 2025, 2403160-ACE-XX-XX-DR-C-0602.
- Drawing: Emergency Access onto Oxhey Lane, i-Transport, 28 March 2025, ITL200107-GA-007, Revision A.
- Drawing: Site Location Plan, Pegasus Group, 28 March 2025, P24-2204-DE-001_A_1.
- Drawing: Parameter Plan, Pegasus Group, 28 March 2025, P24-2204-DE-003_10.