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**Lead Local Flood Authority
Growth and Environment
Hertfordshire County Council
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Farnham House
Six Hills Way, Stevenage
HERTFORDSHIRE, SG1 2ST
www.hertfordshire.gov.uk**

Contact: Flood Risk Management Team
Email: FRMConsultations@hertfordshire.gov.uk

Date 7 February 2025

Dear Claire

RE: 24/2073/OUT – Outline Application: Development of up to 600 residential dwellings (Use Class C3(a)), construction of a 5-bedroom property for children’s social care and supported living (Use Class C3(b)). Two vehicular access points from Little Green Lane and further pedestrian / cycleway accesses. A one form entry primary school (Use Class F1(a)) (plus expansion land for a two-form entry primary school). A mixed-use local centre including provision for NHS health and social care services (Use Class E(e)), community building (Use Class F2), retail and cafe provision (Use Class E(a-c)), car parking and associated infrastructure. A country park, areas for play and recreation, allotments, community orchard and landscaping with associated infrastructure including sustainable urban drainage systems. (Layout, scale, appearance and landscape as reserved matters) – Land to North of Little Green Lane, Croxley Green, WD3 3SP

Thank you for your consultation on the above site, received on 21 January 2025. We have reviewed the application as submitted and wish to make the following comments.

This is an Outline Application for up to 600 residential dwellings, a social care / assisted living facility and a medical centre.

We are concerned that calculations have not been provided for all rainfall return periods up to and including the 1% AEP plus appropriate climate change allowance event. This should include the correct parameters (FEH2013 / FEH22, CV value of 1, 10% urban creep and correct climate change allowance on the 3.33% AEP and 1% AEP events). Additionally, we are concerned that the level of detail on the masterplan drawing is not sufficient. Currently, the swales do not appear to connect into the drainage system and there is no outfall (infiltration rate) for the basin.

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

- The proposed SuDS are likely to increase the risk of flooding elsewhere.
- The development is not in accordance with NPPF, PPG or local policies.
 - Three Rivers SFRA Level 2

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 on the accompanying Planning Application Technical Response document are adequately addressed.

Informative

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

Ellie

Ellie Miller
SuDS and Watercourses Support Officer
Growth and Environment

Annex

The following documents have been reviewed.

- Report: Flood Risk Assessment, prepared by BWB, 17 December 2024, REF 233574-BWB-ZZ-XX-T-W-0002_FRA REV P04
- Report: Sustainable Drainage Statement, prepared by BWB, 11 December 2024, REF 233574-BWB-ZZ -XX-T-W-0001_ SDS REV P01