

Director of Environment & Infrastructure:  
Mark Kemp



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**Lead Local Flood Authority**  
**Post Point CHN 215**  
**Hertfordshire County Council**  
**County Hall, Pegs Lane**  
**HERTFORD SG13 8DN**

Contact Charlotte Kemp  
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Date 09 April 2019

**RE: 07/19/0200/F – Fairmead, 90 Cuffley Hill, Goffs Oak, Hertfordshire, EN7 5EX**

Dear Peter,

Thank you for consulting us on the above application for the erection of 58 dwellings (17no. 2 bed , 14no. 3 bed, 22no. 4 bed, 1no. 5 bed) with associated infrastructure at Fairmead, 90 Cuffley Hill, Goffs Oak, Hertfordshire, EN7 5EX.

The applicant has provided a Flood Risk Assessment prepared by Ardent Consulting Engineers, report ref. 162101-03, dated December 2018, to support the application. Unfortunately the information provided to date does not provide a suitable basis for an assessment to be made of the flood risks arising from the proposed development.

Therefore, we object to the grant of planning permission and recommend refusal until the following is clarified:

- 1) Confirmation of feasible discharge mechanism/location
- 2) Justification of SuDS features with appropriate management and treatment

### **Overcoming our objection**

- 1) The proposed drainage strategy is based on attenuation and discharge via a variable flow control device, restricted to greenfield run-off rates to an existing ditch. There are mapped ordinary watercourses beginning just west of the site. However, this ditch is not a mapped ordinary watercourse, and as such there are no records of this ditch connecting on to the ordinary watercourses. There is no evidence provided as to where this ditch goes.

The ditch identified by the applicant appears to be along the site boundary line, which may flow towards the mapped ordinary watercourses in the west, however it is not confirmed that this ditch connects to an ordinary watercourse.

If there is a connection to either of the mapped ordinary watercourses, the LLFA may consider the “ditch” to be an ordinary watercourse. However, at present, we would not consider the ditch to be a feasible discharge mechanism.

As this is a full planning application, confirmation of a feasible surface water discharge mechanism/location is required.

Please note that any works to an ordinary watercourse, permanent and / or temporary, require the prior written consent from the Lead Local Flood Authority (Hertfordshire County Council), under the Land Drainage Act 1991, regardless of any planning permission.

- 2) The applicant has discounted permeable paving due to underlying clay soils. However, permeable paving with sub-base can be lined when installed in clay soils; providing both a level of treatment for surface water and also providing additional storage. The LLFA would consider this to be a more sustainable option than directly into a piped system. Permeable paving would also provide additional management and treatment, especially considering the proposed discharge into a channel. Permeable paving could be used for the private roads and driveways, especially considering that the road will not be adopted.

As the applicant is proposing to discharge into an open channel additional management and treatment is required to ensure and maintain water quality.

For more information on ordinary watercourse, please consult our ordinary watercourse webpages: <https://www.hertfordshire.gov.uk/services/recycling-waste-and-environment/water/ordinary-watercourses/ordinary-watercourses.aspx>

For more information on what we require within a surface water drainage assessment, including the developers guide and checklist, please see our surface water drainage webpages: <https://www.hertfordshire.gov.uk/services/recycling-waste-and-environment/water/surface-water-drainage/surface-water-drainage.aspx>

### **Informative to the LPA**

The applicant can overcome our objection by submitting information which covers the deficiencies highlighted above and demonstrates that the development will not increase risk elsewhere and where possible reduces flood risk overall, and gives priority to the use of sustainable drainage methods. If this cannot be achieved we are likely to maintain our objection to the application. We would be happy to be re-consulted with the above clarifications addressed and will provide you with bespoke comments within 21 days.

Please note if the LPA decides to grant planning permission we wish to be notified for our records.

Yours sincerely,

Charlotte Kemp  
SuDS & Watercourses team leader, Environmental Resource Planning