

Growth & Environment

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Contact: SuDS and Watercourses Team
FRMConsultations@hertfordshire.gov.uk

Your ref: 26/00116/FP
Date: 04 August 2026

Dear Thomas,

RE: 26/00116/FP - Erection of four detached dwellings and detached garage to serve plot 4 including hard and soft landscaping, parking and creation of vehicular access - 19 Walnut Tree Road, Pirton

Thank you for your consultation on the above application. We note that this application is for non-major development on which the LLFA is not a statutory consultee, however we are pleased to provide comments given the site's proximity to ordinary watercourses and recent flooding issues.

We have reviewed the Flood Risk Assessment and Drainage Strategy prepared by GHBullard & Associates LLP reference 175/2026/FRADS.

Primary and secondary drainage strategies have been prepared. The primary strategy is to discharge via infiltration with plot-level soakaways subject to additional chalk testing, while the secondary strategy proposes a discharge to the watercourse at 16l/s if the chalk testing is not suitable, with attenuation tanks. In both strategies it is proposed to culvert part of the watercourse to facilitate the access road and parking/turning area. We welcome that Finished Floor Levels (FFLs) are proposed 150 – 300mm above ground levels. We note that the infiltration testing was not undertaken in accordance with BRE Digest 365 (three fillings per trial pit, etc) however will be satisfied to condition further ground investigations pursuant to approval of the secondary drainage strategy.

We would recommend the following elements are addressed before planning permission is granted.

1. Secondary drainage strategy discharge rate

If infiltration is not feasible, it is proposed to discharge to the watercourse at 16l/s. This is far above the greenfield runoff rate for the site.

We acknowledge a restriction to <1l/s can increase risk of blockage due to the necessary orifice; however, the proposed rate is too high and would significantly increase the rate of surface water draining to this watercourse, which has been associated with flood risk issues in the past.

We recommend the discharge rate is revisited and restricted as low as possible. We would suggest 1l/s, though we would accept a lower rate where robust maintenance and blockage prevention measures are proposed.

2. SuDS Selection

We have no concerns regarding the infiltration-based strategy subject to the further testing.

For the attenuation-based strategy, we would recommend that further consideration is given to the use of SuDS before resorting to below ground attenuation. Where above ground SuDS cannot be proposed, justification should be provided.

We acknowledge the site will not have many shared areas where open features could be proposed but note the previous design for the site included a pond in the centre. We would recommend that the proposed pond is carried forward, as it would contribute towards the National SuDS Standards and reduce reliance on underground attenuation.

We recommend that the properties could benefit from end of downpipe measures, such as SuDS planters or SuDS pods, which would also provide amenity and biodiversity benefits. All opportunities to provide above ground at-source SuDS should be explored before considering tanked attenuation, particularly on a greenfield site.

These would also contribute towards the standards for biodiversity and amenity. At present, it is not clear how these standards are being met.

3. Maintenance responsibility

We are satisfied that full maintenance details can be secured under condition but recommend clarification of who will be responsible for the proposed attenuation crates. It seems one tank is proposed across the curtilages of both Plots 1 and 2, while the smaller tank is opposite. We highly recommend that attenuation tanks do not cross boundaries such that they become shared features, or that a single resident becomes responsible for a SuDS feature that serves multiple properties. Tanks are likely to require specialist machinery/contractors to inspect and maintain and are costly to replace in the long-term. We recommend that attenuation SuDS serving multiple properties be located in shared areas.

Furthermore, we recommend confirmation of who will be responsible for maintaining the length of watercourse where it is within the site, including both ends of the proposed 300mm culvert.

We recommend that any SuDS maintenance responsibilities are clearly detailed in the conveyance process/property welcome packs or similar that new residents may receive.

4. Proposed extension of 300mm culvert

We note that it was previously proposed to daylight the existing 300mm watercourse. We would recommend this proposal is retained, which would provide amenity and biodiversity benefits.

We also note that it is now proposed to culvert a greater length of the existing watercourse to facilitate the road area. We recommend that any culverting is for the minimum length possible. The earlier design with a shorter length of culverting was preferable. Subject to the necessary studies, it may be possible to divert/realign the watercourse to reduce the extent of culverting.

We recommend an impact assessment of extending the 300mm culvert is provided. We acknowledge the upstream 150mm outfall is the main control on this section of the network but recommend assurance the extension of the culvert and any loss in channel capacity will not have a detrimental impact. As noted in the FRA, alterations to the ordinary watercourse are likely to require Land Drainage Consent under Section 23 of the Land Drainage Act 1991.

5. Calculations

We recommend confirmation that CV values of 1 have been used in the calculations is provided.

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.

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. It is advised to discuss proposals for any works at an early stage of proposals.

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.

Yours sincerely,

David Uncle
Principal Flood Risk Officer
Lead Local Flood Authority
Growth and Environment