

Growth & Environment

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

Your ref: 26/00116/FP
Date: 11 May 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 information submitted with the application. We note that a flood risk assessment and drainage strategy has not been submitted, therefore at this stage would recommend that permission is not granted.

The planning statement submitted with the application identifies that the site is in Flood Zone 1 but does not discuss other sources of flood risk (such as surface water, ordinary watercourses and groundwater), nor does it consider the flood history of the area. We recommend that a flood risk assessment (FRA) is prepared that considers the ordinary watercourse running through the site and any associated flood risk, as well as surface water and groundwater risk.

A drainage strategy has not been submitted, however the site plan proposes that a new pond be constructed in the centre of the site on top of the existing ordinary watercourse. We highly recommend that a drainage strategy that contains the following information is submitted prior to the grant of planning permission. Please note that the below is not exhaustive and we may seek to provide further comments once an FRA and drainage strategy has been submitted.

- Detailed engineered design drawings demonstrating how it is proposed to capture, attenuate and discharge surface water (at either the greenfield runoff rate or to the ground via infiltration if feasible).

- The drainage design will be in accordance with the National Standards for SuDS 2025, including interception of the first 5mm of rainfall, evidence the discharge hierarchy has been explored and the use of source control SuDS.
- Supporting calculations of greenfield runoff rates and for the proposed drainage network, using FEH22 rainfall data and CV values of 1. Hydraulic calculations should be provided for all events up to and including the design event, with an appropriate allowance for climate change in the 1% and 3.33% AEP events (+40% and 35%, respectively). A 10% uplift to impermeable areas within property curtilages for urban creep shall also be included.
- Ground investigations confirming whether infiltration is feasible, including evidence of groundwater levels (a minimum 1m buffer between seasonally high groundwater levels and the base of infiltration features should be provided).
 - o It may be possible to condition infiltration testing and groundwater monitoring, with an infiltration-based strategy being the preferred approach, subject to designs for an infiltration-based ("Plan A") and restricted discharge-based ("Plan B") strategy being submitted.
- It seems it is proposed to place a pond on the ordinary watercourse. If this is the proposal, the design must include a low-flow channel so that the proper flow of water through the ordinary watercourse from upstream is not impeded by the pond / any associated flow control structures, such that flood risk upstream is not increased, and evidence to confirm that the pond's capacity would not become compromised during a storm event in which the watercourse is full and seeking to drain the wider upstream catchment. It may be simpler for the pond to be off-line from the watercourse. These proposals must be supported by an assessment of the ordinary watercourse and contributing areas including the culvert under Walnut Tree Road that connects to the watercourse from Blacksmiths Pond.
- Acknowledgement that alterations to the watercourse are likely to require consent from the LLFA under separate legislation (Section 23 of the Land Drainage Act 1991 – this is regardless of but often in addition to planning permission).
- Land drainage consent will be required for culverting the site road over the watercourse. A clear span arrangement should be considered first, which would minimise impact on the watercourse and be exempt from consent. If not possible, a short culvert would be acceptable in principle for an access crossing.
- Land drainage consent is not required at the planning application stage, but we require a flood risk assessment and evidence that the proposed culverting (and any other alterations to the watercourse) would not adversely affect flood risk up

and downstream, particularly when there have been recent issues on the upstream watercourse on Walnut Tree Road.

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
Senior Flood Risk Officer
Lead Local Flood Authority
Growth and Environment