

Growth & Environment

Ben Glover
Local Planning Authority
North Herts Council
Council Offices
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SG6 3JF

Lead Local Flood Authority
Hertfordshire County Council
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Six Hills Way, Stevenage
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www.hertfordshire.gov.uk

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

Your ref: 25/02064/OP
Date: 17 October 2025

Dear Mr Glover

RE: 25/02064/OP - Erection of up to 50 dwellings including affordable housing, together with amenity space, landscaping and all associated infrastructure and works (all matters reserved except means of access) - Land Adjacent To 10 Hambridge Way, Pirton, Hertfordshire

Thank you for your consultation on the above site, received on 15 September 2025. We have reviewed the application as submitted and wish to make the following comments.

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

- The proposed SuDS are likely to increase the risk of flooding elsewhere.
- The development is not in accordance with NPPF and PPG.

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 following issues are adequately addressed.

1. Clarification should be given on the proposed discharge rate for the site and whether this is achievable without increasing the risk of blockage. A HydroBrake has been used to achieve the proposed rate of 0.4l/s which is likely to result in a small opening size.

2. Further detail should be provided on the watercourse which is proposed to receive from the runoff from the site (e.g. cover/invert levels) to ensure it is sufficient condition to receive flows. Given the absence of the above information on the watercourse, the calculations should also be run with a surcharged outfall. This surcharge level must be the 1% AEP flood event of the receiving watercourse if known or bank full if not already hydraulically modelled.
3. We note that an attenuation basin is proposed to provide the majority of the storage volume required for the site, with some permeable paving proposed in the west. Although this is an outline application, we require evidence that there will be sufficient space on the development to incorporate source control SuDS measures. We typically expect a minimum of 20% of storage volume required for the site to be provided within source control SuDS.

Informative

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 and the Local Council (if they have specific land drainage bylaws). It is advised to discuss proposals for any works at an early stage of proposals.

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

Jake

Jake Silverton
SuDS and Watercourses Support Officer
Growth and Environment

Annex

The following documents have been reviewed.

- Report: Flood Risk Assessment, Stomor, August 2025