

Mr Tom Rea
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**Lead Local Flood Authority
Growth and Environment
Hertfordshire County Council
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Contact: SuDS and Watercourse Team
Email: FRMConsultations@hertfordshire.gov.uk

Date 7 August 2025

Dear Mr Rea

RE: 25/00886/FP- Erection of 14 dwellings and associated infrastructure- Reed House, Jacksons Lane, Reed, Royston, Hertfordshire, SG8 8AB

Thank you for your consultation on the above site, received on 14 July 2025, for a full planning application. We have reviewed the application as submitted and wish to make the following comments.

It is understood that the full application is seeking planning permission for the construction of 14 residential dwellings on land currently used as the property's garden, with the existing Reed House dwelling and its associated hardstanding infrastructure to be maintained. The proposals include the provision of 28 on-site parking spaces. It is also understood that pre-application advice was sought for the proposed development in June 2023 (23/00694/PRE).

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

- Potential increase in flood risk as a result of the development and its proposed drainage scheme
- The development is not in accordance with the new National Standards for Sustainable Drainage Systems (June 2025).

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.

The main points of this are:

- 1) Updated drainage calculations are required to incorporate a climate change allowance on both the 1% AEP and 3.33% AEP events and to provide calculations for additional events (i.e. 100% AEP, 50% AEP, 3.33% AEP, 1% AEP and 0.1% AEP).
- 2) Greenfield runoff rates require clarification and confirmation.
- 3) Greenfield runoff volumes must be provided.
- 4) FEH13 or 22 should be used in rainfall scenarios for drainage modelling.
- 5) CV value should be set to 1.
- 6) Half drain down times must be provided.
- 7) Third-party, riparian ownership agreements and details on adoption must be 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 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. This is outside of the planning process and should be undertaken by the applicant as a separate matter.

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

Lizzie

Lizzie Todd-Davies
SuDS and Watercourses Support Officer
Growth and Environment

Annex

The following documents have been reviewed:

- Report: Application Form (Redacted), 27 March 2025, PP-13851020.
- Drawing: Master Site Location Plan, Sapele Design Limited, 20 March 2025, S1017 - PL01.P1.
- Drawing: Topographical & Level Survey, Ratcliff Land & Engineering Surveys Ltd, 02 May 2025, 4703-1revA-sheet1, Rev A.
- Drawing: Topographical & Level Survey, Ratcliff Land & Engineering Surveys Ltd, 02 May 2025, 4703-1revA-sheet2, Rev A.
- Report: Combined Flood Risk Assessment & Drainage Strategy, Peter Dann Consulting Engineers, 26 February 2025, 10-5217, Rev F.
- Report: Design and Access Statement, Sapele Design Limited, March 2025, S1017.
- Report: Stage 1/Tier 1 Geo-Environmental Desk Study Report, JPC Environmental Services, 15 December 2023, IE23/105/SIT1.
- Drawing: Proposed Floor Plan Affordable Dwelling Type D, Sapele Design Limited, 20 June 2025, S1017 - PL42.P2.
- Drawing: Proposed Floor Plan Residential Dwelling Type C, Sapele Design Limited, 20 June 2025, S1017 – PL39.P2.
- Drawing: Proposed Floor Plan Affordable Dwelling Type B, Sapele Design Limited, 20 June 2025, S1017 – PL38.P2.
- Report: Planning Statement, Strutt & Parker, March 2025.
- Drawing: Master Site Plan Layout Proposed Layout, Sapele Design Limited, 20 June 2025, S1017 - PL22.P3.
- Drawing: O/S & Site Survey Layout, Sapele Design Limited, 20 June 2025, S1017 - PL10.P2.
- Drawing: Landscape Strategy Plan, Liz Lake Associates, 09 June 2025, 2901-LLA-ZZ-ZZ-DR-LO-0001, Revision P02.
- Drawing: Proposed Floor Plan Affordable Dwelling Type E, Sapele Design Limited, 20 June 2025, S1017 – PL45.P2.