

Naomi Reynard
Local Planning Authority
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**Lead Local Flood Authority
Growth and Environment
Hertfordshire County Council
Post Point CHN 215
Farnham House,
Six Hills Way, Stevenage
HERTFORDSHIRE, SG1 2ST
www.hertfordshire.gov.uk**

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

Date 21 August 2025

Dear Ms Reynard

RE: 25/01696/OP - Outline application for the erection of up to 130 dwellings with public open space, landscaping, sustainable drainage system (SuDS), and associated works with all matters reserved save for access - Land Southeast of Holwell Road and North of Hambridge Way Pirton

Thank you for your consultation on the above site, received on 18 July 2025. We have reviewed the application as submitted and wish to make the following comments.

We **object** this planning application in the absence of an acceptable Flood Risk Assessment (FRA) 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. Further information should be provided on the proposed discharge point for surface water runoff, including details on the condition and capacity of the watercourse and the culvert near the south eastern boundary of the site. We note that there is another development to the west which is said to discharge into the watercourse along the southern boundary. In addition, based on the current topography of the site it does

not appear that all the surface water runoff would drain into the southern watercourse. As a result of these factors, it is important to demonstrate that the watercourse will have sufficient capacity and is a suitable destination for surface water runoff.

2. Although we note that this is an outline application, we would recommend any open SuDS features (especially basins/ponds) have at least 300mm freeboard in the 1% AEP plus climate change event.
3. As the site mainly slopes from west to east, we would expect justification to demonstrate that all of the areas of open space do not need to be included in the drainage calculations. For example, there is a proposed area of open space in the south western corner which is likely to drain into the proposed attenuation pond and so should be included in the drainage calculations to ensure adequate storage is provided.

Informative

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, GTA Civils and Transport, June 2025