

Growth & Environment

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

Your ref: 25/03064/DOC
Date: 26 March 2026

Dear Tom

RE: 25/03064/DOC - Details reserved by condition 31 (Drainage 1) of planning permission reference 20/02412/FP granted 17.07.2025. Land Between 53 And 81 and Land Rear of 7-53 Waterdell Lane St Ippolyts

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

The applicant would want to discharge Condition 31 under the planning permission 20/02412/FP which includes '*Erection of 52 dwellings including open space, landscaping, local area for play, and associated highway works (as amended by plans received 09/03/23 and 30/08/23)*'.

The hydraulic calculations were carried out using the latest FEH rainfall data. The contributing impermeable areas within 1.45 hectares, have been assessed in line with the development layout. Any surface water runoff will be managed by directing it to an attenuation basin, supported by infiltration trenches. The results confirm that the drainage network will not experience flooding under conditions up to a 1% AEP event, including allowances for 40% climate change and 10% urban creep. However, we are concerned by the mass balance values shown within the results. The lowest mass balance values suggest errors within the calculations. Clarification is required around these values.

The applicant has also not addressed Point 5 of Condition 31, which stipulates the need for an emergency spillway to the attenuation basin/pond, as well as detailed plans showing the exceedance flow paths to manage potential drainage system failures.

We advise that there **isn't sufficient technical information** to support the application in relation to the wording of Condition 31.

We have concerns that the submitted information does not meet with NPPF, PPG or the LLFA Flood Risk Management Strategy policies and the proposal will either increase the risk of flooding elsewhere or to the proposed development. We provide the following technical review for your consideration.

The main issues include;

- Emergency spillway and exceedance flow route assuming the failure of the drainage network.
- Low mass balance values suggesting errors within the calculations.

The LLFA technical review includes;

1. The applicant has not addressed Point 5 of Condition 31, which stipulates the need for an emergency spillway to the attenuation basin/pond, as well as detailed plans showing the exceedance flow paths to manage potential drainage system failures.
2. Clarification around the mass balance values shown within the calculations.

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.

Yours sincerely

Veeranna

BHUKYA VEERANNA
SuDS and Watercourses Support Officer
Growth and Environment

Annex

The following documents have been reviewed, which have been submitted to support the application;

- Report: Hydraulic Calculations by Infrastructure Design Limited dated 27 November 2025 with reference 1331 St St Ippolyts SWS Rev C.
- Drawing: Adoptable Drainage Layout by Infrastructure Design Limited dated 26 November 2025 with reference 1331-03-01 Rev A.
- Drawing: Drainage Details sheet 1 by Infrastructure Design Limited dated 26 November 2025 with reference 1331 – 03 – 04.
- Drawing: Drainage Details sheet 2 by Infrastructure Design Limited dated 26 November 2025 with reference 1331 – 03 – 05.
- Drawing: Drainage Details sheet 3 by Infrastructure Design Limited dated 26 November 2025 with reference 1331 – 03 – 06.
- Drawing: Drainage Details sheet 4 by Infrastructure Design Limited dated 26 November 2025 with reference 1331 – 03 – 07.
- Drawing: Drainage Details sheet 5 by Infrastructure Design Limited dated 26 November 2025 with reference 1331 – 03 – 08.
- Drawing: Longitudinal Sections – sheet 1 by Infrastructure Design Limited dated 26 November 2025 with reference 1331 – 04 – 01.
- Drawing: Longitudinal Sections – sheet 2 by Infrastructure Design Limited dated 26 November 2025 with reference 1331 – 04 – 02 rev A.
- Drawing: Adoptable Drainage, Manhole Schedules and Pond Details by Infrastructure Design Limited dated 26 November 2025 with reference 1331 – 04 – 03 rev A.
- Drawing: Engineering Layout Overall by Infrastructure Design Limited dated 26 November 2025 with reference 1331 – 05 – 00 rev A.
- Drawing: Engineering Layout sheet 1 by Infrastructure Design Limited dated 26 November 2025 with reference 1331 – 05 – 01 rev A.
- Drawing: Engineering Layout sheet 2 by Infrastructure Design Limited dated 26 November 2025 with reference 1331 – 05 – 02 rev A.
- Drawing: Engineering Layout sheet 3 by Infrastructure Design Limited dated 26 November 2025 with reference 1331 – 05 – 03 rev A.
- Drawing: Engineering Layout sheet 4 by Infrastructure Design Limited dated 26 November 2025 with reference 1331 – 05 – 04 rev A.

For reference, Condition 31 wording is as follows:

Condition 31:

Prior to commencement of development, in accordance with the submitted FRA (Flood Risk Assessment by Ardent Consulting Engineers, Ref: 191381-02D, rev D, dated February 2023) and Drainage Strategy Plan, Ref. 171381-001 rev K, dated February 2023, detailed design of a surface water drainage scheme incorporating the following measures shall be submitted to and agreed with the Local Planning Authority. The approved scheme will be implemented prior to the first occupation of the development.

The scheme shall address the following matters:

- I. Surface water runoff will be directed to an attenuation basin with infiltration trenches installed at its bottom to allow the surface water flows to infiltrate into the ground. Any excess water will be stored in the attenuation storage provided.
- II. The contributing impermeable areas will reflect the areas as proposed within the new development layout (C00205-MCL-EX-XX-DR-A-P0001 Rev D, submitted in March 2023) and be exact as proposed, and not based on assumptions, as currently proposed. Urban creep of 10% will still apply. The total impermeable area should however stay within the limit of 1.45ha as agreed within the FRA.
- III. Provision of surface water attenuation storage, sized and designed to accommodate the volume of water generated in all rainfall events up to and including the critical storm duration for the 3.33% and 1% annual probability rainfall events (both including allowances for climate change).
- IV. Detailed designs, hydraulic calculations and plans of the whole drainage design including the conveyance network and any storage features in the:
 - a. 3.33% annual probability critical rainfall event plus climate change to show no above ground flooding on any part of the site.
 - b. 1% annual probability critical rainfall plus climate change event to show, if any, the depth, volume and storage location of any above ground flooding from the drainage network ensuring that flooding does not occur in any part of a building or any utility plant susceptible to water (e.g. pumping station or electricity substation) within the development.
 - c. The latest relevant FEH rainfall data should be used in the model provided for the whole drainage network, as it was previously provided for the basin.
- V. The design of the infiltration / attenuation basin will incorporate an emergency spillway, and any drainage structures include appropriate freeboard allowances. Plans to be submitted showing the routes for the management of exceedance surface water flow routes that minimise the risk to people and property during rainfall events in excess of 1% annual probability rainfall event plus climate change. The plan will include the proposed finished ground levels and finished floor levels.

Reason: To prevent flooding in accordance with National Planning Policy Framework paragraph 167, 169 and 174 by ensuring the satisfactory management of local sources of flooding 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.