

Growth & Environment

Alex Howard
Local Planning Authority
North Herts Council
Council Offices
Gernon Road
Letchworth Garden City
Hertfordshire
SG6 3JF

Lead Local Flood Authority
Hertfordshire County Council
Post Point CHN215
Farnham House
Six Hills Way, Stevenage
Hertfordshire SG1 2FQ
www.hertfordshire.gov.uk

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

Your ref: 25/01766/OP
Date: 14 November 2025

Dear Alex

RE: 25/01766/OP – Outline application with means of access for residential development of up to 30 dwellings (including affordable housing); following demolition of all existing structures; associated landscaping, drainage, car parking; infrastructure and all ancillary and enabling works (all matters reserved except means of access) – Land on the South side of Cowards Lane, Codicote

Thank you for your consultation on the above site, received on 16 September 2025. We have reviewed the application as submitted and wish to make the following comments.

This is an outline planning application for up to 30 dwellings following demolition of all existing structures at Land on the South Side of Cowards Lane, Codicote.

We welcome the information provided in the 'Response to Lead Local Flood Authority' Technical Note (prepared by Create | 28 October 2025 | Ref: CEB/CC/P25-3473/03TN). The justification outlined in the Technical Note is sufficient to remove our previous objections. In the absence of any other feasible discharge method accessible from the site, the use of deep bore soakaways is justified and allowable by exception. The site is located within Source Protection Zone 2 and therefore we would recommend that the Environment Agency are consulted as an Environmental Permit may be required to discharge via deep infiltration. The maintenance of the proposed deep bore soakaways and quality of surface water runoff drained through them are critical considerations, so we have recommended conditions to confirm these details.

The applicant has provided a Flood Risk Assessment (FRA) and a Drainage Strategy. These are to account for the local flood risk issues and surface water drainage at this location. Following a review of the submitted documents, the details are in accordance with NPPF and North Herts Local Plan.

We have **no objection subject to conditions being attached to any consent** if this application is approved. We suggest the following wording.

Condition 1

Prior to or in conjunction with the submission of each reserved matters application, in accordance with the submitted FRA and Drainage Strategy (JE/CC/P25-3473/01), detailed designs 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. Detailed infiltration testing in accordance with BRE Digest 365 (or equivalent) along the length and proposed depth of the proposed infiltration features, as stated within the FRA and Drainage Strategy.
- II. 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% AEP (1 in 30 year) and 1% AEP (1 in 100) rainfall events (both including allowances for climate change).
- III. Detailed designs, modelling calculations and plans of the of the drainage conveyance network in the:
 - a. 3.33% AEP (1 in 30 year) critical rainfall event plus climate change to show no flooding outside the drainage features on any part of the site.
 - b. 1% AEP (1 in 100 year) critical rainfall plus climate change event to show, if any, the depth, volume and storage location of any flooding outside the drainage features, 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. It will also show that no runoff during this event will leave the site uncontrolled.
- IV. The design of the 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% AEP (1 in 100) rainfall event plus climate change allowance.
- V. Finished ground floor levels of properties are a minimum of 300mm above expected flood levels of all sources of flooding (including the ordinary watercourses, SuDS features and within any proposed drainage scheme) or 150mm above ground level, whichever is the more precautionary.
- VI. Details of how all surface water management features to be designed in accordance with The SuDS Manual (CIRIA C753, 2015), including appropriate treatment stages for water quality prior to discharge. This is to include detailed

information on how road runoff will be treated prior to reaching the deep bore soakaways.

Reason:

To prevent flooding in accordance with National Planning Policy Framework paragraphs 181, 182 and 187 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.

Condition 2

The development hereby approved shall not be occupied until details of the maintenance and management of the sustainable drainage scheme have been submitted to and approved in writing by the Local Planning Authority. The drainage scheme shall be implemented prior to the first occupation of the development hereby approved and thereafter managed and maintained in accordance with the approved details in perpetuity. The Local Planning Authority shall be granted access to inspect the sustainable drainage scheme for the lifetime of the development. The details of the scheme to be submitted for approval shall include:

- I. a timetable for its implementation.
- II. details of SuDS feature and connecting drainage structures and maintenance requirement for each aspect including a drawing showing where they are located.
- III. a management and maintenance plan for the lifetime of the development which shall include the arrangements for adoption by any public body or statutory undertaker, or any other arrangements to secure the operation of the sustainable drainage scheme throughout its lifetime. This will include the name and contact details of any appointed management company.

Reason: To ensure that the development achieves a high standard of sustainability and ensure the flood risk is adequately addressed for each new dwelling and not increased in accordance with NPPF and Policies of North Herts Council.

Condition 3

Prior to first use of each phase of the development a detailed verification report, (appended with substantiating evidence demonstrating the approved construction details and specifications have been implemented in accordance with the surface water drainage scheme), has been submitted to and approved (in writing) by the Local Planning Authority. The verification report shall include a full set of "as built" drawings plus photographs of excavations (including soil profiles/horizons), any installation of any surface water drainage structures and control mechanisms.

Reason: To ensure that the development achieves a high standard of sustainability and ensure the flood risk is adequately addressed for each new dwelling and not increased in accordance with NPPF and Policies of North Herts Council.

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

Alex

Alex Jones
SuDS and Watercourses Support Officer
Growth and Environment

Annex

The following documents have been reviewed.

- Report: Response to Lead Local Flood Authority Comments for the Proposed Development at Cowards Lane, Codicote, Technical Note | prepared by Create | 28 October 2025 | Ref: CEB/CC/P25-3473/03TN
- Report: Flood Risk Assessment and Drainage Strategy | prepared by Create | July 2025 | Ref: JE/CC/P25-3473/01