

Growth & Environment

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

Your ref: 25/00571/FP
Date: 11 December 2025

Dear Alex

RE: 25/00571/FP – Erection of 24 dwellings including creation of vehicular access off High Street, associated parking, drainage, amenity space and landscaping – Land North of Milksey Lane, Graveley

Thank you for your consultation on the above site, received on 25 September 2025. We have reviewed the application as submitted and wish to make the following comments.

This is a Full Planning Application for the erection of 24 dwellings at Land North of Milksey Lane.

We are still concerned that there is no in principle agreement from Thames Water confirming sufficient capacity within the sewer system for this development. We are also concerned that there is no reference to finished floor level in regard to the maximum design water level (i.e. 300mm).

We **object** to this planning application in the absence of an acceptable Drainage Strategy relating to:

- The proposed SuDS are likely to increase the risk of flooding elsewhere.
- The development is not in accordance with NPPF, PPG or North Herts local policies including NE8 and NE9.

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 below are adequately addressed.

1. **Freeboard:** Drainage Strategy Drawing (dated 15 September 2025, REF 29161_01_230_01) does not include the FFL of the properties. The main body of text states that the development is 150mm above external ground levels. However, there is no reference to the 300mm maximum design water level. **Further information is required.**
2. **Discharge Hierarchy:** Pre-development enquiry needs to be sought after from Thames Water. We note a Site Location Survey has been done by Anglian Water. We would require confirmation as to whether Thames or Anglian Water will be accepting flows from this development. **Further information is required.**
3. **Calculations:** The drainage calculations must be shown to include a surcharged outfall to a watercourse or culverted watercourse or watercourse within a sewer. This surcharge level must be the 1% AEP flood event of the receiving watercourse if known or bank full if not already hydraulically modelled. **Further information is required.**
4. **Easement of Basin:** There is no 3m easement on the basin on site. This is required to show how it can be maintained or whether further land is required to facilitate it. **Further information is required.**
5. **Construction Management Plan:** A high-level assessment of how water quantity and water quality will be managed during the construction phase is required. Identifying high level assumptions such as need to discharge to a sewer or watercourse with appropriate pollution measures. This can be conditioned once the above objections have been rectified. **Further information is required.**

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

Ellie

Ellie Miller
SuDS and Watercourses Support Officer
Growth and Environment

Annex

The following documents have been reviewed.

- Report: Flood Risk and Drainage – Milksey Lane Phase 2, prepared by MEC Consulting Group, September 2025, REF 29161-FLD-0101 Rev A
- Report: Flood Risk and Drainage, prepared by MEC Consulting Group, December 2024, REF 29161-FLD-0101