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Lead Local Flood Authority
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Contact: SuDS and Watercourse Team
Email: FRMConsultations@hertfordshire.gov.uk

Date 29 August 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 27 July 2025. We have reviewed the application as submitted and wish to make the following comments.

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

We are significantly concerned about the use of borehole soakaways on site. We would need to see sufficient justification for why other methods of discharge cannot be used instead, following the discharge hierarchy. Deep bore soakaways are permissible by exception only and are not considered to follow a SuDS approach. Additionally, we would also need to see a more detailed drainage plan (i.e. correct easement, vehicular access and suspected pipe runs).

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 Policy NE8: Sustainable drainage systems (Reducing Flood Risk) and Policy NE9: Water quality and environment.

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.

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 Assessment and Drainage Strategy | prepared by Create | July 2025 | REF JE/CC/P25-3473/01