

Planning Application Technical Response

Site:	Land On The South Side Of Cowards Lane, Codicote, Hertfordshire
LPA Reference:	25/01766/OP
Date Assessed:	29 August 2025

OUTLINE / Reserved Matters APPLICATION	Related Policy or Standard	Applicant Action Required	LLFA Specific Comment
All sources of flooding considered?	NPPF Paragraph 170, 181 PPG Paragraph 051 SDNSTS S10 Policy NE8: Sustainable drainage systems (Reducing Flood Risk)	Provide updated information within an amended FRA on; ☐ Fluvial flooding from the ordinary watercourse ☐ Surface water flow path originating offsite ☐ Groundwater flooding ☐ Rainwater surcharged sewer flooding ☐ Historic flood information	Fluvial – Flood Zone 1 – Low Surface Water – Low Groundwater – Low Sewer – Low Artificial – Low
		☐ Address concerns that there is not sufficient room within the development boundary to address flood risk mitigation and also achieved the suggested density of the development.	Not required – Low flood risk.
Mitigation not appropriate	NPPF Paragraph 170, 176 and 181 PPG Paragraph 004, 023, 037, 041, 042, 043 and 044 Policy NE8: Sustainable drainage systems (Reducing Flood Risk)	☐ Use sequential approach with the following hierarchy. I. how can the development first avoid the risk of flooding II. how will it be mitigated (with evidence) III. how will flood resistance and resilience be employed	The development avoids the risk of flooding as it is within a low flood risk area for all sources of flooding.
		☐ The proposal increases the risk of flooding to existing infrastructure, dwellings, or property. Mitigation should be re-assessed to show how flood risk can be reduced overall.	Not required – Low flood risk.
		☐ Provide information on safe access and egress to show how the development will be safe for its lifetime. This may include assessment of how proposals will not increase the number of people living and working in areas of flood risk and if there is any additional burden placed on the emergency services. An emergency plan may also form part of this assessment (see www.adeptnet.org.uk).	Included – Section 4.20

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Long term sustainability of the development	NPPF Paragraph 176 and 181 PPG Paragraph 004, 036, 061, 068 and 069 Policy NE8: Sustainable drainage systems (Reducing Flood Risk)	☐ Provide site specific ordinary watercourse or surface water flow path hydrological and hydraulic modelling.	Not required – Low flood risk area.
		☐ Demonstrate that any residual risk is managed with appropriate flood resistance and resilience measures.	Not required – Low flood risk area.
		☒ Include evidence of appropriate freeboard to finished floor levels from the design flood level.	Objection: The main body of text (Section 6.5) states that finished floor levels will be situated 75mm – 150mm above the external ground levels. We would need further indication as to why finished floor levels cannot be set at 150mm above external ground levels or 300mm above the maximum design water level.
		☐ Include appropriate climate change allowance on modelling scenarios for assessment of the lifetime of the development (including the 3.33% AEP design flood event).	Not required – Low flood risk area.
		☐ Use up to date FEH2013 or 2022 rainfall data for all design flood events.	Not required – Low flood risk area.
		☐ Identification is required of those structures which require consent for works on an ordinary watercourse (from the LLFA), this extends to works required within 8m from the top of the bank (see HCC LLFA website).	Not required – No works on the watercourse.
How does the site currently drain?	NPPF Paragraph 182 PPG Paragraph 059	☒ Evidence required on ground conditions / BRE365 or similar infiltration testing / dissolution potential / seasonally high groundwater levels.	Objection: Further testing is required for shallow infiltration. The testing, at present, is not BRE365 standard.

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	SDNSTS S1, S2, S3, S4, S5, S6 Policy NE8: Sustainable drainage systems (Reducing Flood Risk)	☐ Greenfield runoff rates and volumes are missing or need to be recalculated (incorrect input parameters).	Included – In Appendix.
		☐ Pre-development brownfield runoff rates are missing or need to be recalculated (incorrect input parameters).	Not required – Greenfield Site.
		☐ Drawing required to show where existing drainage network and outfall/s are, plus confirmation if will they be retained or removed.	Not required – Greenfield Site.
		☐ Drainage survey required to provide evidence of existing discharge rate and condition (may include detailed asset or CCTV survey and estimation of discharge from an existing pipe diameter/slope).	Not required – Greenfield Site.
Where will the site drain to?	NPPF Paragraph 182 PPG Paragraph 055, 056, 059, 060, 061, 062 and 063 SDNSTS S12, S13 and S14 Policy NE8: Sustainable drainage systems (Reducing Flood Risk)	Drainage location hierarchy has not been followed, further information is required on;	Included – To be developed at detailed design stage.
		☐ Evidence why rainwater reuse can't be included.	
		☐ Source control and interception has not been provided by the provision of vegetated SuDS.	Informative: Further information is required on source control.
		☒ Infiltration proposals – re Groundwater Source Protection Zone I restrictions (only clean roof water in a sealed system may be discharged).	Objection: Further testing is required for shallow infiltration. The testing, at present, is not BRE365 standard.
		☒ Surface watercourse – does it connect to the wider network and is there permission and there are agreed access locations for proposed outfalls with the riparian owner?	Objection: Online mapping shows a watercourse directly to the south of the site. Further information is required as to why this cannot be used instead of deep bore infiltration.

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		☐ Surface water sewer – no in principle agreement from owner of the asset.	Included – Asset location survey shows no surface water sewers.
		☐ Combined sewer – no in principle agreement from owner of the asset.	Not required – Not proposed.
		☐ In principle objection - proposing to connect surface water runoff to foul sewer.	Not required – Not proposed.
		☐ Detailed justification required why the application cannot be drained via gravity and a pump is required.	Not required – Not proposed.
		☐ Full impact assessment of failure of a pumped system and emergency procedures to store 24 hours of water is required.	Not required – Not proposed.
		☒ Justification is required as to why a deep bore infiltration feature has been proposed prior to shallow infiltration or connection to a surface watercourse.	Objection: Detailed justification needs to be provided that no other feasible options could be used as alternative (i.e. shallow infiltration / connection to watercourse / sewer).
Are the 4 pillars of SuDS provided and are they multifunctional?	NPPF Paragraph 182 PPG Paragraph 036, 055, 056, 059, 060, 061, 062 and 063	☒ Overarching commitment to proposals of how application must provide water quantity benefits in open and above ground SuDS.	Objection: Further information is required on above ground SuDS (i.e. why are rain gardens not viable 'due to site layout' and swales). Spatial constraints is not a valid reason.

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	Policy NE9: Water quality and environment	☒ Commitment to the use of SuDS and high-level assessment to include: ☒ water quality ☒ biodiversity ☒ amenity	Objection: Simple index approach has not been included for water quality. Informative: Further information is required for biodiversity. Informative: Further information is required for amenity.
How will the site drain without adversely effecting flood risk elsewhere?	NPPF Paragraph 181, 182 SDNSTS S2, S3, S4, S5, S6 Policy NE8: Sustainable drainage systems (Reducing Flood Risk)	☒ The most precautionary infiltration rate should be used in the design of the attenuation feature.	Objection: Further testing is required for shallow infiltration. The testing, at present, is not BRE365 standard.
		☒ Infiltration rates are shown to be favourable and should be used in the drainage design (where appropriate).	Objection: Further testing is required for shallow infiltration. The testing, at present, is not BRE365 standard.
		☒ Infiltration storage drainage design should be recalculated to either only discharge through the sides of the structure or apply the appropriate factor of safety.	Objection: Further testing is required for shallow infiltration. The testing, at present, is not BRE365 standard.
		☒ Infiltration drainage storage has half drain down time greater than 24 hours and an alternative design or mitigation is required.	Objection: Further testing is required for shallow infiltration. The testing, at present, is not BRE365 standard.
		☒ The post development 100% AEP (or 1 in 1 year) rainfall event runoff rate should also be controlled to the equivalent pre-development rate.	Objection: Confirmation is needed by the applicant on the strategy prior to sign off of discharge rates.
		☒ Proposed discharge rates and volumes are greater than greenfield with no justification.	Objection: Confirmation is needed by the applicant on

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			the strategy prior to sign off of discharge rates.
		☐ Proposed discharge rates include future allowances for climate change and / or urban creep. These must be removed, and all calculations resubmitted.	Not required – Not included.
		☐ Require justification and supporting calculations for brownfield % betterment and why this can't be closer to the predevelopment greenfield scenario.	Not required – Greenfield development.
		☒ Proposed discharge rates would increase flood risk elsewhere and need to be re-assessed.	Objection: Confirmation is needed by the applicant on the strategy prior to sign off of discharge rates.
		☒ A minimum runoff rate between 1 to 2 l/s/ha should be applied in groundwater dominated areas if infiltration cannot be undertaken.	Objection: Confirmation is needed by the applicant on the strategy prior to sign off of discharge rates.
		☒ How will the development not increase the volume of runoff as only pre and post calculations of greenfield runoff rate have been provided?	Objection: Confirmation is needed by the applicant on the strategy prior to sign off of discharge rates.
		☒ A complex control for runoff rates with long term storage provided, is required, if the drainage proposal is not limiting runoff to QBAR or 2 l/s/ha.	Objection: Confirmation is needed by the applicant on the strategy prior to sign off of discharge rates.
		☐ Include appropriate climate change allowance for the lifetime of the development (including 3.33% AEP design) for drainage modelling storage volumes.	Included – 35% on the 3.33% AEP and 40% on the 1% AEP events.
		☐ Outline drainage modelling calculations should be resubmitted and demonstrate how 10% urban creep has been included in the volume of SuDS storage required.	Included – Section 5.14.

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		☐ Outline drainage modelling calculations should be resubmitted using a CV value of 1.	Included – CV value of 1.0 has been used.
		☐ Use up to date FEH 2013 or FEH2022 rainfall parameters in any drainage modelling scenarios.	Included – FEH22 has been used.
Location of SuDS		☒ Masterplan drawings need to show the high-level location of all SuDS and demonstrate that the volume of storage can be achieved in the layout. This includes the consideration for constraints (e.g., pipeline crossings and how gravity drainage can be achieved).	Objection: Outfall is not clear on the drainage layout plan.
		☐ Address concerns that there is not enough room within the masterplan for all SuDS features e.g. sufficient room for swales along main roads and still achieved the required density of the development.	Included – Low surface water flood risk on site, no flooding in the drainage calculations.
How will the drainage and watercourse features be managed and maintained?	NPPF Paragraph 182 PPG Paragraph 055, 057 and 058 SDNSTS S10, S11, S12, S13 and S14	☐ High level assessment of the maintenance of any SuDS features and structures and who will be adopting these features for the lifetime of the development.	Included – further detail will be needed for full planning.
		☒ Appropriate easements (to the adopting authority standard) to SuDS features should be shown on a the masterplan drawing, this will be a minimum of 3m.	Objection: Easement is not clearly three metres on the south side. We would need sufficient easement.
		☒ Indicative vehicular access route and off-road parking needs to be provided to ponds, basins and swales within the masterplan.	Objection: Vehicular access has not been provided for the basin on site.
		☐ Provide an easement of a minimum of 3 m from the top bank of any watercourse is required for maintenance. This should be on both banks, but justification should be provided if access is proposed from only one side of the bank or is less than 3m (e.g. 2.5 times the width of any plant likely to be used (from the top of bank with maintenance plant parallel to the watercourse).	Not required – No watercourse within the RLB.

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		☐ Due to the likely long duration build out time (including phased development proposals), supporting drainage calculations and drawings are required to show a timeline of how temporary measures will be put in place to protect the water environment and any newly built SuDS features. This will include any temporary water quality and water quantity flow control devices required.	Not required – Single Phased development.
		☐ As it is a phased development, a surface water management and construction phasing plan is required. This must show how each phase can be provided independently (in terms of surface water drainage) and how any infrastructure which is relies on will be constructed prior to any housing or commercial development.	Not required – Single Phased development.
		☒ A high-level assessment of how water quantity and water quality will be managed during the construction phase is required. Identifying high level assumptions of a construction management plan, such as the need to discharge to a sewer or watercourse with appropriate pollution measures.	Objection: Not provided. Can be conditioned once the above has been rectified.
Other		☐ Bespoke advice	N/A – Covered in checklist.