

Growth & Environment

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

Your ref: 26/00116/FP
Date: 09 August 2026

Dear Thomas,

RE: 26/00116/FP - Erection of four detached dwellings and detached garage to serve plot 4 including hard and soft landscaping, parking and creation of vehicular access - 19 Walnut Tree Road, Pirton

Thank you for your re-consultation on the above application. We note that this application is for non-major development on which the LLFA is not a statutory consultee, however we are pleased to provide comments given the site's proximity to ordinary watercourses and recent flooding issues.

We have reviewed the Flood Risk Assessment and Drainage Strategy prepared by GHBullard & Associates LLP reference 175/2026/FRADS.

Primary and secondary drainage strategies have been prepared. The primary strategy is to discharge via infiltration with plot-level soakaways subject to additional chalk testing, while the secondary strategy proposes a discharge to the watercourse at 1l/s if the chalk testing is not suitable, with attenuation tanks. In both strategies it is proposed to culvert a short length of the watercourse to facilitate the access road and parking/turning area. We welcome that Finished Floor Levels (FFLs) are proposed 150 – 300mm above ground levels. We note that the infiltration testing was not undertaken in accordance with BRE Digest 365 (three fillings per trial pit, etc) however will be satisfied to condition further ground investigations pursuant to approval of the secondary drainage strategy.

1. Secondary drainage strategy discharge rate

We previously advised concerns around the proposed discharge rate in the secondary drainage strategy option (based on attenuation storage and discharge to the watercourse). It is now proposed to discharge at 1l/s. We accept this proposed rate.

2. SuDS Selection

We have no concerns regarding the infiltration-based strategy subject to the further testing.

We welcome the updates to the drainage strategy, specifically the addition of SuDS Pods to the new dwellings which will provide source control surface water management.

We are still concerned with the significant use of below-ground attenuation storage on a greenfield site. The attenuation tank will provide the necessary attenuation volume but does not offer further benefits (amenity, biodiversity, etc). We acknowledge that the daylighting of the existing culvert is likely to contribute towards these objectives.

Considering the use of permeable paving, SuDS Pods and deculverting of the watercourse we recommend that further details on this could be satisfied under condition.

3. Maintenance responsibility

We understand that the attenuation tank will be the responsibility of a private management company set up by the developer for the plot owners.

We note that the proposed daylighted watercourse would be between plots two and three. We have no objection to this however would advise the applicant that the watercourse would likely become the responsibility of one or both of the plots as the riparian owners of the watercourse. It may be possible for this to be picked up by the management company, but the riparian owners may retain the ultimate responsibility for inspecting and maintaining the watercourse.

4. Calculations

Confirmation of CV values of 1 being used in the design has been provided.

Accordingly, we recommend the following conditions be attached to the application if permission is granted.

Condition 1:

Prior to the commencement of any demolition or construction of the development, in accordance with the technical note reference 175/2026/001/JAH dated 13 August 2026 and enclosed drainage strategy drawings prepared by GHBullard & Associates LLP, detailed designs of a surface water drainage scheme in accordance with the National Standards for SuDS 2025 and incorporating the following measures shall be submitted to and agreed with the Local Planning Authority. The approved scheme shall be constructed and will be implemented prior to the first occupation of the development. The scheme shall address the following matters:

1. Detailed infiltration testing in accordance with BRE Digest 365 (or equivalent) along the length and proposed depth of the proposed infiltration feature/s

Or, if infiltration is unviable

Surface water runoff rates will be attenuated to 1 l/s and discharged to the ordinary watercourse.

2. Provision of interception for the first 5mm of rainfall for the majority of rainfall events.
3. Provision of multiple surface water attenuation storage features, 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 and 1% AEP rainfall events (both including allowances for climate change).
4. Detailed designs, modelling calculations and drawings of the of the drainage storage and conveyance network in the:
 - a. 3.33% AEP critical rainfall event plus climate change to show no flooding outside the drainage features on any part of the site.
 - b. 1% AEP 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.
 - c. Attenuation features will half drain their runoff volume rainfall events up to the 3.3% AEP critical rainfall event within 24 hours for infiltration and 48 hours for lined systems.
 - d. Urban Creep of 10% shall be added to impermeable areas of residential properties.
5. Detailed designs of the proposed daylighted watercourse including gradient, side slopes, finished ground levels and planting regime.
6. Finished ground floor levels of residential 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.

Reason: To prevent flooding in accordance with National Planning Policy Framework paragraphs F7, F8 and N2(1) (e) plus National SuDS Standards 1 to 7, 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:

Prior to the commencement of any demolition or construction of the development, a construction phase surface water management plan for the site will be submitted to and approved in writing by the Local Planning Authority. This plan shall provide full details of who will be responsible for maintaining such temporary systems and demonstrate how the site will be drained to ensure there is no increase in the off-site flows, nor any pollution, debris and sediment to any receiving watercourse or sewer system. The temporary drainage scheme shall subsequently be implemented in accordance with the approved details prior to and during the construction phase and be appropriately decommissioned following the final drainage scheme being validated as operational. Survey and photographic evidence of remediation shall be supplied for any permanent SuDS used in the temporary scheme, prior to being made operational.

Reason: To ensure that the construction of the site is appropriately managed in accordance with National SuDS Standard 7, does not result in any flooding both on and off site in accordance with NPPF, and that the ordinary watercourse is adequately protected.

Condition 3:

Prior to the commencement of the deculverting of the ordinary watercourse, an impact assessment (which may include hydraulic modelling incorporating upstream catchments) shall be undertaken, submitted to, and approved in writing by the Local Planning Authority. The assessment shall demonstrate that the deculverting will not result in an increase in flood risk elsewhere. The assessment should consider the proposed ground levels, the detailed design of the daylighted ordinary watercourse, and any proposed crossings.

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 F8 and Local Plan Policies of North Hertfordshire District Council.

Condition 4:

The development hereby approved shall not be occupied until details of the maintenance and management of the Sustainable Drainage Scheme (SuDS) in accordance with National SuDS Standard 7 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 network in addition to those listed in SuDS Standard 7 to be submitted for approval shall include:

1. A timetable for its implementation.

1. Details of SuDS feature and connecting drainage structures and maintenance requirement for each aspect including a non-technical labelled drawing showing where they are located and how to access them.
2. 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 Local Plan Policies of North Hertfordshire District Council.

Informative

Erection of flow control structures or any culverting (or deculverting) of an ordinary watercourse requires consent from the appropriate authority, which in this instance is Hertfordshire Lead Local Flood Authority. It is advised to discuss proposals for any works at an early stage of proposals.

Both FEH13 and FEH22 are currently accepted to support drainage modelling calculations. For the avoidance of doubt the use of FSR and FEH1999 data has been superseded and therefore, use in rainfall simulations are not accepted.

Yours sincerely,

David Uncle
Principal Flood Risk Officer
Lead Local Flood Authority
Growth and Environment