

Growth & Environment

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

Your ref: 26/01924/FP
Date: 7 September 2026

Dear Linda

RE: 26/01924/FP - Erection of 109 residential dwellings with access, parking, hard and soft landscaping and public open space following demolition of all existing buildings and structures. Former Big Cat Sanctuary Codicote Road Codicote AL6 9TU

Thank you for your consultation on the above site, received on 3 September 2026. We have reviewed the application as submitted and wish to make the following comments.

The application is for the erection of 109 residential dwellings on a 4.09 ha site, with associated development.

There is not sufficient information to demonstrate that the proposed drainage system accords with the National Standards for Sustainable Drainage Systems (SuDS).

We **object** to this planning application in the absence of an acceptable Flood Risk Assessment (FRA) and Drainage Strategy and supporting information relating to:

- The proposed SuDS are likely to increase the risk of flooding elsewhere.
- The development is not in accordance with NPPF, PPG or Welwyn Hatfield Borough Council's local policies including SADM14.

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 following issues are adequately addressed.

1. Paragraph 7.8 of the FRA proposes to discharge surface water to the existing foul network under Codicote Road. However, there is inconsistency within the report if this is a foul sewer or a combined sewer. Thames Water sewer mapping indicates this a foul water sewer.

The National Standards for SuDS 2025 state in paragraph 1.10 “**Surface water runoff from the development shall not discharge to a foul drainage system**”. NPPF Section F8 states that SuDS should “be designed in accordance with the National Standards for Sustainable Drainage Systems”. Accordingly, the proposal to discharge surface water to the foul sewer is not in compliance with the National Standards for SuDS and therefore also NPPF.

The foul sewer is not considered part of the discharge hierarchy in PPG or the National Standards. An alternative discharge option should be presented, such as discharging to the ordinary watercourses or River Mimram to the south even if this means crossing third-party land. Subject to infiltration testing results, it may be feasible to adjust the layout such that there is suitable room for infiltration SuDS such as basins, soakaways, rain gardens and similar.

2. There is a significant surface water flow path on the south and eastern portion of the site. There is development proposed within the surface water flow path. A sequential approach to the location of development should be followed, keeping development out of the flow path first before other options are considered.
3. Ground raising is proposed within areas of surface water flow. A detailed hydraulic assessment should be provided to demonstrate that this will not alter overland flow routes or increase flood risk elsewhere.
4. The FRA identifies that the principal access route is crossed by the existing surface water flow path originating from Codicote Road. While the applicant states that flood depths are expected to be relatively shallow and that the flow path will not be altered, insufficient evidence has been provided to demonstrate that the proposed road construction, level changes and associated drainage infrastructure will not restrict conveyance or redirect flow. We also recommend that the Flood Map for Planning be used as the evidence base for surface extents and depths, as the most recently updated data (NaFRA2 and 2026 depth mapping, etc).

Furthermore, considering the site will be used for housing, it is necessary to demonstrate that safe access and egress will not be prohibited by the flow path. Hazard analysis using FD2320 guidance may be helpful in establishing if the access is safe.

Since the access road and ground levels are proposed to be raised, it may be necessary to undertake the sequential test unless mitigation is provided that demonstrates the surface water risk will be managed without increasing flood risk elsewhere (as per NPPF F5).

5. The eastern corner of the site is also shown to be in Flood Zone 2. We note the applicant's commentary regarding the HCC webmap and Flood Map for Planning. The Flood Map for Planning is more recently updated and includes the climate change allowances for 2070 – 2125, and should be considered. Noting the Product 4 and 6 data provided by the EA, we recommend the applicant consults with the EA to determine which information is most suitable for the purposes of informing the design.
6. The drainage strategy relies heavily on extensive use of underground tanks and proposes no SuDS, with no justification for their exclusion. We acknowledge the site is brownfield however this does not preclude the use of above-ground, source control multifunctional SuDS. This is contrary to the requirements of the National SuDS Standards and NPPF.

Principle 1 of the National SuDS Standards states that surface water drainage systems shall be designed, constructed, maintained and operated following a natural approach to managing water. These should mimic natural drainage processes and manage surface water close to the surface and at-source. This is not demonstrated by this design.

In particular, National Standard 2, requires management of everyday rainfall and interception of the first 5mm of rainfall wherever practicable. This has not yet been demonstrated.

For Standard 3, if discharging to a sewer or watercourse (notwithstanding that discharging to the foul sewer is not acceptable), the discharge rate should be limited to the greenfield QBAR rate or 2l/s/ha. As a brownfield site, a 5x relaxation factor may be applied if it is not possible to restrict to the greenfield rate.

National Standard 4 regards water quality treatment. Currently, no surface water treatment is provided. The scheme should provide a clear SuDS treatment train and not be reliant on conventional pipework and underground storage. We would accept indication of water quality treatment using the CIRIA Simple Index Approach.

National Standards 5 and 6 relate to amenity and biodiversity where development should include multifunctional SuDS features such as rain gardens, swales, bioretention areas, permeable paving or other blue-green infrastructure measures. In the absence of any SuDS, the application has not demonstrated the above or justified full reliance on underground attenuation or that a pumped system is necessary.

We recommend that the applicant demonstrates how a proposed drainage strategy satisfies each of the National Standards for SuDS in turn. Please note that the National Standards for SuDS are “intended for application in the design of surface water drainage systems for new infrastructure and development, whether on greenfield or brownfield sites”.

7. We note the southern attenuation tank is proposed beneath the gardens of multiple properties. Notwithstanding the above comments regarding the National

Standards, we highly recommend below-ground features such as tanks are not located across multiple private curtilages. This is for maintenance access and responsibility reasons.

8. The supporting calculations use FSR rainfall data which is outdated. Please could updated calculations using FEH2022 be provided. Furthermore, CV values should be set to 1. The calculations also include elements of infiltration; however, we understand that infiltration was rejected on the grounds that infiltration features might be located too close to dwellings. This should be clarified. A 10% allowance for urban creep should also be provided. Half drain down times should also be provided – these should be within 24 hours for infiltration systems or 48 hours for linted systems.
9. There is insufficient investigation of the existing drainage system. A sufficient understanding of existing drainage conditions is fundamental to demonstrating that runoff pathways, existing connections and flood mechanisms have been appropriately assessed.

Informative

For further advice on what we expect to be contained within the FRA and/ or a Drainage Strategy to support a planning application, please refer to the Validation List and Proforma on our surface water drainage webpage

<https://www.hertfordshire.gov.uk/services/recycling-waste-and-environment/water/surface-water-drainage/surface-water-drainage.aspx> this link also includes HCC's Flood Risk Management policies on SuDS in Hertfordshire. We do expect the Validation List to be submitted to the Local Planning Authority and LLFA to show you have provided all information and the Proforma to the LLFA to summarise the details of the proposed development.

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

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

Deborah Craig
Flood and Water Project Officer
Growth and Environment

Annex

The following documents have been reviewed.

- Report: Flood Risk Assessment. Hardy-Tunstall. July 2026. Reference 225091-FR001.