

Growth & Environment

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

Your ref: 26/00276/FP
Date: 1 April 2026

Dear Henry Thomas

RE: Erection of 21 Dwellings including creation of two vehicular access roads and off-site highway improvements, provision of play area, landscaping and associated infrastructure - Land Opposite Silver Ball London Road Reed Hertfordshire SG8 8BA

Thank you for your consultation on the above site, received on 23 February 2026. We have reviewed the application as submitted and wish to make the following comments.

Proposed development comprising the erection of 21 residential dwellings, together with the formation of two new vehicular access roads to serve the site. The scheme also includes off-site highway improvement works to enhance connectivity and safety, the provision of a dedicated children's play area, comprehensive landscaping to integrate the development into its surroundings, and all associated infrastructure required to support the new community.

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 Local Plan Policies of North Herts District Council.

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. An updated Drainage Strategy with supporting drainage calculations including the complete network to test for flooding using FEH rainfall parameters (either FEH13 or FEH22). Other parameters to use are the CV value of 1, the current allowances of climate change and 10% uplift for urban creep. The rainfall simulations are expected to include 100% AEP (1 year), 3.33%AEP (30 year), 3.33%AEP (30 year) with climate change allowance, 1% AEP (100 year) and 1% AEP (100 year) with climate change allowance events. Any feature that is designed to hold water should include a minimum freeboard of 300mm between maximum design water level and soffit / top of bank. The labels in drainage drawings should match the labels in the supporting calculations.
2. Ground flood finished floor levels should have a freeboard of a minimum of 150mm above proposed external ground level or a minimum of 300mm above the maximum design water level from any source, whichever is most precautionary.
3. As a full application, provide detailed plans for the proposed drainage strategy plan to include swale information, pipe network details, nodes, links, attenuation basins, etc. and provide direction of flow through the network. Drawings of cross sections and long sections of all the network and structures such as ponds, basins and swales need to be supplied.
4. Exceedance flow information should be provided, setting out flow routes and safe storage areas.
5. Information should be provided on how the drainage features are to be maintained for the lifetime of the development, including required activity, activity frequency and responsibility of maintenance.

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. 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.

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

Pranav

Pranav P V
SuDS and Watercourses Support Officer
Growth and Environment

Annex

The following documents have been reviewed.

- Report: Flood Risk Assessment & Sustainable Drainage Strategy, prepared by MTC Engineering, dated December 2025, Ref: 3075 – FRA & DS, Rev: A