

Growth & Environment

Paul Chaston
Local Planning Authority
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Hertfordshire
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Lead Local Flood Authority
Hertfordshire County Council
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Six Hills Way, Stevenage
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www.hertfordshire.gov.uk

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

Your ref: 25/02401/OP
Date: 2 December 2025

Dear Paul,

RE: 25/02401/OP - Outline planning application for residential development with means of access from Turnpike Lane for consideration and all other matters reserved for subsequent approval; demolition of all existing structures; associated landscaping, drainage, car parking; infrastructure and all ancillary and enabling works - Land South of Turnpike Lane, Ickleford Hertfordshire SG5 3XB

Thank you for your consultation on the above site, received on 3 October 2025. We have reviewed the application as submitted and wish to make the following comments.

This is an Outline planning application with all matters reserved except means of access and the applicant would like to develop a residential development of up to 100 dwellings with access from Turnpike Lane including associated landscaping, drainage, car parking following demolition of all existing structures within the area of 6.98 hectares.

We **object** to this planning application in the absence of an acceptable or / and Drainage Strategy or / and supporting information relating to:

- The proposed SuDS are likely to increase the risk of flooding within the site and elsewhere.
- The development is not in accordance with NPPF, PPG or North Herts local policies including Policy NE8 and Policy NE9.

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 below are adequately addressed:

- 1) The applicant is required to ensure that the finished floor level is elevated at least 300mm above the design flood level, in consideration of the 300mm flood depth identified at the proposed attenuation basin under a 3.33% Annual Exceedance Probability (AEP) event.
- 2) The applicant is required to submit a drawing that includes ground levels and clearly delineates the above-ground flood extent and depth associated with a 1% Annual Exceedance Probability (AEP) event, inclusive of climate change considerations.
- 3) The applicant is required to submit cross-sectional layouts and specifications of the proposed storage structures and attenuation basin.
- 4) The drainage strategy drawing lacks clear labelling and does not correspond with the presentation format used in the drainage calculations.
- 5) A portion of the site's surface water is proposed to be pumped to the nearest existing storm sewer manhole located on the eastern side of the site. Consent must be obtained from the relevant authority for this discharge, and documentation of the agreed discharge rate must be submitted as part of the application. Discharging surface water via a pumped arrangement is allowable by exception only and must be supported by an assessment of the risk of pump failure.
- 6) A high-level assessment should be provided outlining the proposed measures for managing both water quality and water quantity throughout the construction phase. This should include strategies to mitigate sedimentation, control runoff, prevent pollution, and ensure compliance with relevant environmental standards. This detail can be secured under condition.

Informative

- 1) The applicant has indicated an intention to incorporate rainwater harvesting; however, the specific type of rainwater features proposed have not been clearly defined. Furthermore, no supporting documentation has been provided to demonstrate how the harvested rainwater will be reused.
- 2) The applicant has not accounted for urban creep within the hydraulic calculations, and no allowance for its potential impact has been identified.
- 3) The applicant has not confirmed whether the proposed development will be delivered in phases. If appropriate, a Construction Phase Surface Water Management Plan should be submitted to address surface water control measures during each stage of construction.

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.

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

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BHUKYA VEERANNA
SuDS and Watercourses Support Officer
Growth and Environment

Annex

The following documents have been reviewed.

- Report: Flood Risk Assessment and Drainage Strategy volume 1 of 2 by Create dated August 2025 with reference GB/VL/P25-3474/01.
- Report: Flood Risk Assessment and Drainage Strategy volume 2 of 2 by Create dated August 2025 with reference GB/VL/P25-3474/01.
- Report: Preliminary Risk Assessment by CKConsulting and Geotechnical dated May 2025 with reference GI-201 and revision V2.
- Drawing: Proposed Access Arrangement by RGP dated 23 July 2025 with reference IMI-XX-XX-DR-T-005 and revision P03.