

Growth & Environment

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

Your ref: 25/03234/FP
Date: 08 May 2026

Dear Paul,

RE: Creation of 50 no. one, two, three and four bedroom houses and apartments plus associated landscaping, open space, roads, drainage and other infrastructure - Land East Of Bedford Road And North Of The Priory School Hitchin Hertfordshire

Thank you for your consultation on the above site, received on 24 March 2026. We have reviewed the application as submitted and wish to make the following comments.

The applicant has provided a Flood Risk Assessment (FRA) and bespoke surface water modelling. These documents have been submitted to address local flood risk issues associated with an off-site surface water flow path which crosses the site. Following review, the submitted information accords with the requirements of the National Planning Policy Framework (NPPF) and relevant Local Plan policies of North Herts Council.

The submitted FRA confirms that the site lies within Flood Zone 1 and demonstrates that, with the proposed mitigation measures in place, the development will be safe for its lifetime and will not increase flood risk elsewhere. Bespoke two-dimensional surface water modelling has been undertaken to assess baseline and post-development scenarios, including the 1% AEP rainfall event plus 40% climate change allowance, in accordance with current national guidance.

However, no surface water drainage strategy has been submitted for the proposed development. The surface water drainage scheme must prioritise the use of source control Sustainable Drainage Systems (SuDS) in consideration of the Non-Statutory Technical Standards for SuDS and demonstrate no increase in flood risk as a result of the Proposed Development with sufficient supporting evidence provided to support its viability including supporting calculations for the 100% AEP (1 in 1 year), 3.33% AEP (1 in 30 year), 3.33% AEP (1 in 30 year) plus climate change, the 1% AEP (1 in 100

year) and the 1% AEP (1 in 100) plus climate change critical storms. The design should follow the hierarchy of preference for different types of surface water drainage disposal systems. Infiltration testing and groundwater monitoring will be required to support the design of any infiltration drainage

Given the existing flood risk to the site and the proposed works to mitigate this risk, any proposed drainage network must be designed with appropriate capacity to manage storm events up to the 1% plus climate change without impacting the proposed mitigation works. Any proposed drainage features must be outside of the areas of surface water flood risk to ensure they are not inundated in heavy rainfall events.

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

- The development is at risk of surface water flooding. **We advise that you as Local Planning Authority, ensure that this application passes the sequential test.**
- 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 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. A detailed surface water drainage strategy is required in accordance with National and Local planning policy and guidance.

Informative:

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 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.

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

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Dinu Maria Jose
SuDS and Watercourses Support Officer
Growth & Environment

Annex

The following documents have been reviewed, which have been submitted to support the application;

- Report: Flood Risk Assessment-Bedford Road Hitchin, by Arcadis, 5 December 2025, 0203467-ARC-YYY-XX-TR-DH-00003 and P01.