

Growth & Environment

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

Your ref: 26/00006/FP
Date: 9 March 2026

Dear Sam

RE: 26/00006/FP - Erection of 50 no. residential dwellings (including affordable) with public open space, associated parking, landscaping and access. Land to North of Stevenage Road, Hitchin

Thank you for your consultation on the above site, received on 30 January 2026. We have reviewed the application as submitted and wish to make the following comments.

The surface water runoff from the development is proposed to be managed via water butts and permeable paving to an unlined attenuation basin where some will infiltrate to the ground and the balance will discharge via the Ash Brook watercourse to the east of the site and through a flow control, limited to 6.8l/s based on the greenfield rate of 3l/s/hectares. Discharge should preferably be limited to either 2 L/s/ha or the 1:2-year greenfield runoff rate. It should also be noted that Ash Brook has a documented history of flooding many properties in Little Wymondley. Site-specific infiltration test results have not been provided.

We are in favour of these discharge methods and the proposed use of SuDS in the form of water butts, permeable paving and unlined pond. We would, however, encourage further exploration of source-control measure like such as rain gardens, and tree pits (if trees are to be proposed in the areas of open space). We recommend that further information is provided before permission is granted.

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

- The development is not in accordance with NPPF, PPG.

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.

- Site specific infiltration testing is required; any testing should be in accordance with BRE DG 365 and submitted to determine the the principle of discharging to the watercourse is accepted. The lowest infiltration rate calculated should be used in all drainage supporting calculations.
 - The FRA states that site-specific infiltration testing was carried out by Avrion in November 2025 and included within Appendix D. However, the report provides only a summary of the nearest BGS borehole to inform the site's ground conditions. Site-specific infiltration testing will therefore be required.
 - Where a minimum unsaturated zone of 1m could not be provided between the base of the infiltration feature and the maximum groundwater level, the basin should be treated as an attenuation basin.
- A drainage layout and hydraulic calculations have been provided, we note the following:
 - Cross-section details for the proposed SuDS components such as ponds and permeable paving are absent, commentary on how these features will be designed to be multifunctional. We recommend that this information is provided.
 - Exceedance flow routes need to be added to the plan
 - Justify the additional storage of 10m³/ha in the calculations, we would expect this (MADD Factor) to be zero.
 - The modelling shows flooding in the 1:30-year event, which is not acceptable, we recommend a revised design.
 - Flooding is also shown in the 1:100-year + climate change event; this should be designed out or supported by a plan demonstrating that the flood extents will not impact property or access.
 - The outfall should be modelled as surcharged.

- Finished Floor Levels to be shown on the drawing (a minimum 150mm above external ground levels and or 300mm provided between any design flood event and the finished ground floor level)
- The access point to the south-east of the site is in an area of flood risk. Further commentary is required on how this may will be managed to provide safe access and egress. We recommend that the Environment Agency are consulted regarding the proposed fill to adjust the Flood Zone 2 and 3 extent.
- Easements and indicative vehicle access route and off-road parking for the basin is required.
- We recommend further consideration is given to the use of source control SuDS, particularly for highway drainage. Measures such as small rain gardens, SuDS planters, tree pits and similar should be explored to demonstrate the SuDS approach throughout the site. We note there are some undeveloped areas of verge within the site that could accommodate measures like this and provide multiple SuDS benefits at source.
- Evidence of agreement in principle from the jurisdiction body in relation to the proposed discharge rate and location have not been provided.
- A high-level assessment of how surface water will be suitably managed during the construction phase would need to be submitted to support the proposals. This can be conditioned once the above objections are resolved.

Informative

For further advice on what we expect to be contained within the Drainage Strategy to support a planning application, please refer to our 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 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 (including alterations to existing culverts) 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

Maryam Daniyan
SuDS and Water Project Officer
Growth & Environment

Annex

The following documents have been reviewed.

- Report: Flood Risk Assessment and Drainage Strategy, by DHA, November 2025, reference - **34653/CS**.
- Report: Supporting Document 0212026 - Appendixes, by DHA