

Growth & Environment

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

Your ref: 25/03080/HYA
Date: 8 October 2026

Dear Naomi

RE: Hybrid application for a residential-led development comprising residential (Use Class C3), educational use (Use Class F1), a community hub (Use Class F2) with associated new internal roads, access, parking, cycling infrastructure, landscaping and other associated infrastructure. Full application comprises the construction of vehicle access and an active travel link via Mendip Way, with associated landscaping and drainage works. The outline application, for which all matters are reserved except means of access, comprises the erection of up to 640 dwellings (Use Class C3), a site for a primary school, further land reserved for educational use (Use Class F1), a site for a community hub (Use Class F2), with associated infrastructure - GA2, Land North-East of Great Ashby Stevenage Hertfordshire

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

The applicant has provided a Flood Risk Assessment (FRA) and Drainage Strategy (as listed in the Annex). These are to account for the local flood risk issues and surface water drainage at this location. Following a review of the submitted documents, the details are in accordance with NPPF and Local Plan policies of North Herts Council.

The LLFA previously responded to this application in May 2026 stating no objection subject to various conditions being attached. Since this response, amendments have been made to the proposed development. The LLFA have reviewed these changes and note that they do not affect our previous position. Therefore, our response remains the same. This has been included below for clarity.

We have **no objection subject to conditions being attached to any consent** if this application is approved, and the Applicant is in agreement with pre-commencement

conditions. We suggest the following wording. If the following conditions are not included, the development would be contrary to NPPF and Local Plan policies of North Herts Council and we would **object** until such time that the details below are submitted for review. The proposed conditions apply to the entire application site except the final condition which is specific to the full portion of the application.

Condition 1

Prior to or in conjunction with the submission of each Reserved Matters application a detailed site wide SuDS Phase plan which aligns with the site wide phasing plan shall be submitted to and approved in writing by the Local Planning Authority. This SuDS Phasing plan shall ensure that each phase will;

1. address its own surface water runoff and discharge rate,
2. does not exceed the agreed discharge rates for that phase and the total agreed site discharge rate.
3. that source control measures are installed.
4. Temporary discharge rates will be included, to demonstrate the increased overall discharge runoff rate in line with each completion of a phase in the development.
5. The plan shall ensure that each permanent operational SuDS component is adequately protected throughout the development of subsequent phases of the scheme.
6. The plan shall show on a drawing, all exceedance routes throughout the site clearance and construction of the scheme ensuring flood risk is not increased elsewhere.
7. The plan demonstrate how flood risk is not increased to the completed parts of the development itself, and that the site remains safe for all exceedance event flow routes for the lifetime of the development including rainfall greater than design events or during blockage failure of the and how property on and off site will be protected.

Reason: To ensure that the development achieves a high standard of sustainability and ensure the flood risk is adequately addressed for each new dwelling and not increased in accordance with NPPF and Local Plan Policies of North Herts Council.

Condition 2

Prior to or in conjunction with the submission of each reserved matters application (phased development), in accordance with the submitted FRA and or Drainage Strategy (dated 2 January 2026, Ref: 19244/FRA and DS, Rev G) and the approved SuDS phasing plan [as approved through Condition 1 above], detailed designs of a surface water drainage scheme incorporating the following measures shall be submitted to and agreed with the Local Planning Authority. The approved scheme shall be constructed and will be implemented prior to the first occupation of the development (or any phase). The scheme shall address the following matters:

1. Detailed infiltration testing in accordance with BRE Digest 365 (or equivalent) along the length and proposed depth of the proposed infiltration feature/s. For areas where infiltration is not feasible, surface water runoff rates for the entire site will be attenuated to the Qbar rate of 1.58l/s/ha of impermeable area as stated within paragraph 4.25 of the FRA / Drainage Strategy.
2. Provision of interception for the first 5mm of rainfall for the majority of rainfall events.
3. Provision of source control features, sized and designed to accommodate the volume of water generated in all rainfall events up to and including the critical storm duration for the 3.33% AEP and 1% AEP rainfall events (both including allowances for climate change).
4. Detailed designs, modelling calculations and drawings of the of the drainage storage and conveyance network in the:
 - a. 3.33% AEP critical rainfall event plus climate change to show no flooding outside the drainage features on any part of the site.
 - b. 1% AEP critical rainfall plus climate change event to show, if any, the depth, volume and storage location of any flooding outside the drainage features, ensuring that flooding does not occur in any part of a building or any utility plant susceptible to water (e.g. pumping station or electricity substation) within the development. It will also show that no runoff during this event will leave the site uncontrolled.
 - c. Attenuation features will half drain their runoff volume rainfall events up to the 3.3% AEP critical rainfall event within 24 hours for infiltration and 48 hours for lined systems.
 - d. Urban Creep of 10% shall be added to impermeable areas of residential properties.
5. Details of how all surface water management features to be designed in accordance with The SuDS Manual (CIRIA C753, 2015 or any update), including appropriate biodiversity, amenity and treatment stages for water quality prior to discharge.
6. The design of any infiltration / attenuation / detention basins will incorporate an emergency spillway, and any drainage structures include appropriate freeboard allowances. Drawings to be submitted showing the routes for the management of exceedance surface water flow routes that minimise the risk to people and property during rainfall events in excess of 1% AEP rainfall event plus climate change allowance.

Reason: To prevent flooding in accordance with National Planning Policy Framework paragraphs 181,182 and 187 plus National SuDS Standards 1 to 7, by ensuring the satisfactory management of local sources of flooding 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.

Condition 3

Prior to the commencement of any development including earthworks, a construction phase surface water management plan for the site will be submitted to and approved in writing by the Local Planning Authority. This plan shall provide full details of who will be responsible for maintaining such temporary systems and demonstrate how the site will be drained to ensure there is no increase in the off-site flows, nor any pollution, debris and sediment to any receiving watercourse or sewer system. The temporary drainage scheme shall subsequently be implemented in accordance with the approved details prior to and during the construction phase and be appropriately decommissioned following the final drainage scheme being validated as operational. Survey and photographic evidence of remediation shall be supplied for any permanent SuDS used in the temporary scheme, prior to being made operational.

Reason: To ensure that the construction of the site is appropriately managed in accordance with National SuDS Standard 7, does not result in any flooding both on and off site in accordance with NPPF.

Condition 4

Upon completion of the surface water drainage scheme (or phase) and prior to the first occupation of the development (or phase), a detailed verification report, (appended with substantiating evidence demonstrating the approved construction details and specifications have been implemented in accordance with the surface water drainage scheme), has been submitted to and approved (in writing) by the Local Planning Authority. The survey and report shall demonstrate that the surface water drainage system has been constructed in accordance with the details approved and shall include as a minimum.

1. CCTV survey of underground structures,
2. Photographs of excavations (including soil profiles/horizons) and any installation of any surface water drainage structures and control mechanisms.
3. Where necessary, details of corrective works to be carried out along with a timetable for their completion, shall be included for approval in writing by the Local Planning Authority. Any corrective works required shall be carried out in accordance with the approved timetable and subsequently re-surveyed with the findings submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure that the development achieves a high standard of sustainability and ensure the flood risk is adequately addressed for each new dwelling and not increased in accordance with NPPF and Local Plan Policies of North Herts Council.

Condition 5

The development hereby approved shall not be occupied until details of the maintenance and management of the Sustainable Drainage Scheme (SuDS) in accordance with National SuDS Standard 7 have been submitted to and approved in writing by the Local Planning Authority. The drainage scheme shall be implemented prior to the first occupation of the development hereby approved and thereafter managed and maintained in accordance with the approved details in perpetuity. The Local Planning Authority shall be granted access to inspect the sustainable drainage

scheme for the lifetime of the development. The details of the network in addition to those listed in SuDS Standard 7 to be submitted for approval shall include:

1. A timetable for its implementation.
2. Details of SuDS feature and connecting drainage structures and maintenance requirement for each aspect including a non-technical labelled drawing showing where they are located and how to access them.
3. A management and maintenance plan for the lifetime of the development which shall include the arrangements for adoption by any public body or statutory undertaker, or any other arrangements to secure the operation of the sustainable drainage scheme throughout its lifetime. This will include the name and contact details of any appointed management company.

Reason: To ensure that the development achieves a high standard of sustainability and ensure the flood risk is adequately addressed for each new dwelling and not increased in accordance with NPPF and Local Plan Policies of North Herts Council.

Condition 6

Prior to or in conjunction with the submission of a reserved matters application, in accordance with the submitted FRA and or Drainage Strategy (dated 2 January 2026, Ref: 19244/FRA and DS, Rev G), detailed designs of the proposed watercourse diversion should be submitted to and agreed with the Local Planning Authority. The approved scheme shall be constructed and will be implemented prior to the first occupation of the development.

Reason: To prevent flooding in accordance with National Planning Policy Framework paragraphs 181,182 and 187 plus National SuDS Standards 1 to 7, by ensuring the satisfactory management of local sources of flooding 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.

Condition 7

All development shall be constructed in accordance with the submitted and approved Flood Risk Assessment (2 January 2026, Ref: 19244/FRA and DS), this includes all new residential dwellings to have a finished floor level raised a minimum of 300mm above any flood level and 150mm above the surrounding proposed ground level unless otherwise first approved in writing by the Local Planning Authority.

Reason: To ensure the flood risk is adequately addressed and not increased in accordance with NPPF and Policies of North Herts Council.

Full Condition 1

Prior to the commencement of development, construction drawings of the surface water drainage network, associated sustainable drainage components and flow control mechanisms and a construction method statement shall be submitted and agreed in writing by the local planning authority. The scheme shall then be constructed as per the agreed drawings, method statement, FRA and or Drainage Strategy (dated 02 January 2026, Ref: 19244/FRA and DS, Rev G) and associated drawings within the

appendices of that report and remaining in perpetuity for the lifetime of the development unless agreed in writing by the Local Planning Authority. No alteration to the agreed drainage scheme shall occur without prior written approval from the Local Authority.

Reason: To prevent flooding in accordance with National Planning Policy Framework paragraphs 181,182 and 187 plus National SuDS Standards 1 to 7, by ensuring the satisfactory management of local sources of flooding 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.

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 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.

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

Alex

Alex Jones
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 and Drainage Strategy, prepared by Woods Hardwick, 2 January 2026, Ref: 19244/FRA and DS, Rev G