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Contact: SuDS and Watercourses Team
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Date 13 August 2025

Dear Ms Kasparian

RE: 25/01745/S73 - Variation of condition 2 (revised plans) and condition 10 (Flood Risk Assessment) of planning permission 22/03092/FP granted 15.03.2024 for Residential development of 47 dwellings and associated car parking, open space, landscaping and creation of access off Greys Lane (as amended) - Land to the East of Foxholes and Gainsford House and on the West Side of Crow Furlong Hitchin Hertfordshire

Thank you for your consultation on the above site, received on 21 July 2025. We have reviewed the application as submitted and wish to make the following comments.

We understand that this application is seeking the variation of conditions 2 and 10. Only conditions 10 is related to surface water flood risk and drainage so we have no comments to make on the other condition. We do not recommend the variation of condition 10 at this time.

We have concerns that the submitted information does not meet with NPPF, PPG or the LLFA Flood Risk Management Strategy policies and the proposal will either increase the risk of flooding elsewhere or to the proposed development. We provide the following technical review for your consideration.

The LLFA technical review includes;

1. It does appear the full set of drainage calculations has been provided with this application. Calculations have been provided in the submitted Drainage Strategy Update, but they appear to only include the input parameters and not the results of the simulations.

Informative

We note that that this application also provides information for multiple pre-commencement conditions. Although we have not been formally consulted on condition 11, we can advise there is sufficient information to support its wording. The proposed change of wording of condition 11 is also acceptable.

Yours sincerely

Jake

Jake Silverton
SuDS and Watercourses Support Officer
Growth and Environment

Annex

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

- Report: Drainage Strategy Update, Martin Andrews Consulting Ltd, July 2025
- Drawing: Temporary Run Off Plan, Hill Residential Ltd, June 2025

For reference, condition wording is as follows:

Condition 10:

The development permitted by this planning permission shall be carried out in accordance with the approved Flood Risk Assessment prepared by MAC, reference 188-FRA-02-E, Revision E, 20 April 2023. The strategy shall;

- 1. Carry out further detailed infiltration testing (in accordance with BRE Digest 365) in the northwest section of the site (around plots 7 & 30). If infiltration is found to be unviable in this location, there should be further provision of attenuation storage in order to prevent any possible ponding.*
- 2. Limit surface water run-off in the southwest of the site generated by the critical storm events so that it will not exceed the surface water run-off rate of 1.8 l/s during all events up to and including the 1% AEP plus 40% climate change event. The remainder of the site should utilise the infiltration techniques (permeable paving and infiltration basin) as detailed in the approved Flood Risk Assessment.*
- 3. Include a finalised drainage layout alongside full engineering drawings of all SuDS and drainage elements to be implemented.*

The mitigation measures shall be fully implemented prior to occupation and subsequently in accordance with the timing / phasing arrangements embodied within the scheme, or within any other period as may subsequently be agreed, in writing, by the local planning authority.

Reason: To prevent flooding by ensuring the satisfactory disposal and storage of surface water from the site and to reduce the risk of flooding to the proposed development and future occupants.

Condition 11:

Development shall not commence until details and a method statement for interim and temporary drainage measures during the demolition and construction phases have been submitted to and approved in writing by the Local Planning Authority. This information 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. Where temporary discharges to a sewer are proposed, written confirmation from the sewer owner that these have been accepted shall be provided. The site works and construction phase shall thereafter be carried out in accordance with

approved method statement unless alternative measures have been subsequently approved by the Planning Authority.

Reason: To prevent flooding and pollution offsite during construction in accordance with the NPPF.