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Contact: SuDS and Watercourses Team
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Date 16 June 2025

Dear Sarah

RE: 25/01378/DOC – Details reserved by Condition 15 (Phase 2 Geo Investigation Report) of outline planning permission 18/01154/OP granted on 29 November 2024 – Land North of Highover Farm to Stotfold Road, Highover Way, Hitchin

Thank you for your consultation on the above site, received on 27 May 2025. We have reviewed the application as submitted and wish to make the following comments.

We advise that there **isn't sufficient technical information** to support the application in relation to the wording of Condition 15. For reference, Condition 15 is worded as follows:

'No development shall take place until the final design of the drainage scheme is completed and sent to the LPA for approval. The surface water drainage system will be based on the submitted Highover Farm Hitchin, Flood Risk Assessment and Drainage Strategy, Revision 5, dated 12/12/19, prepared by WSP and the Drawing titled: Drainage Construction Sequencing Plan, Drawing No. 62240435- TTP-DP-300-001-02, Rev P07, dated February 2020. The scheme shall also include:

- 1. Detailed infiltration tests to BRE Digest 365 standard carried out at the exact location and depth of the proposed infiltrating features*
- 2. Updated calculations for storage based on detailed infiltration testing.*
- 3. Provision of a SuDS design code for the entire site securing the provision of above ground SuDS features throughout the entire development for all and each phase.*
- 4. Detailed engineered drawings of the proposed SuDS features including their location, size, volume, depth and any inlet and outlet features including any connecting pipe runs and all corresponding calculations/modelling to ensure the scheme caters for all*

rainfall events up to and including the 1 in 100 year + 40% allowance for climate change event.

5. *Provision of half drain down times within 24 hours.*
6. *Details on silt management, ensuring the protection of infiltration as a means of discharge.*
7. *Demonstrate appropriate SuDS management and treatment and inclusion of above ground features such as permeable paving, swales etc. for the paved areas ensuring the lack of requirement for any underground storage.*

Reason: *To prevent flooding by ensuring the satisfactory storage of and disposal of surface water from the site in accordance with North Hertfordshire Local Plan Policies SP9 and SP11 and Section 14 of the NPPF 2023'.*

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 main issues include;

- FLOOD status in several nodes.
- FLOOD status in several pipe numbers.
- Design code cannot be located.
- Volumes have not been provided on drainage layout drawings.
- Details on silt management cannot be located.

The LLFA technical review includes;

In relation to **Point 1**, the Phase 2 Geo-environmental and Geotechnical Site Investigation (prepared by RSK, dated 09 January 2020, REF 340110 RO1 REV 01) shows infiltration to be viable on site. Tests SA1 and SA3 were the only tests exceeding the input. Test SA17 was the only non-confirming test. On this basis, the LLFA are satisfied that infiltration has been explored within the drainage on site. **No further information required.**

In relation to **Point 2**, updated calculations (dated 20 September 2024) have been provided using an infiltration co-efficient rate (1.666). However, these require further justification. There is FLOOD status on several nodes (40, 41, 42 and 94) in the 1% AEP plus 40% climate change allowance event. Additionally, there is FLOOD status on several pipe numbers (9.000, 9.001, 9.002, 20.000). The design will either need to be updated to show no flooding or justification and evidence should be provided on how the system will manage flooding without leaving the site boundary. **Further information is required.**

In relation to **Point 3**, the LLFA cannot locate the SuDS design code for this site. If the applicant would signpost the relevant documentation for review, the LLFA will provide comment within any further consultations. **Further information required.**

In relation to **Point 4**, the LLFA are concerned that the soakaway basins do not have volumes attached to them. At discharge of conditions stage, all volumes should be confirmed and provided. We are also concerned that these drawings are not for detailed design. The status of these drawings are FOR INFORMATION. We would need confirmation that these are detailed design drawings. **Further information required.**

In relation to **Point 5**, half drain down times have been included in all rainfall return periods up to and including the 1% AEP plus appropriate climate change allowance. These drain times are below 24-hours. **No further information is required.**

In relation to **Point 6**, the LLFA cannot locate the information on silt management for this development. If the applicant would signpost the relevant documentation for review, the LLFA will provide comment within any further consultations. **Further information required.**

In relation to **Point 7**, swales have been provided on the drainage layout drawings for treatment. The LLFA are satisfied that the wording of Point 7 has been met. **No further information is required.**

Yours sincerely

Ellie

Ellie Miller
SuDS and Watercourses Team
Growth and Environment

Annex

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

- Report: Phase 2 Geo-environmental and Geotechnical Site Investigation, prepared by RSK, 09 January 2020, REF 340110 R01 (01)
- Supporting Calculations: Supporting Calculations for Highover Farm, prepared by WSP, 20 September 2024
- Drawing: Infrastructure Drainage Layout (Sheet 1), prepared by WSP, 01 November 2024, REF HOF-WSP-ZZ-ZZ-DR-C-5001 REV P04
- Drawing: Infrastructure Drainage Layout (Sheet 2), prepared by WSP, 01 November 2024, REF HOF-WSP-ZZ-ZZ-DR-C-5002 REV P04
- Drawing: Infrastructure Drainage Layout (Sheet 3), prepared by WSP, 01 November 2024, REF HOF-WSP-ZZ-ZZ-DR-C-5003 REV P04
- Drawing: Infrastructure Drainage Layout (Sheet 4), prepared by WSP, 01 November 2024, REF HOF-WSP-ZZ-ZZ-DR-C-5004 REV P04
- Drawing: Infrastructure Drainage Layout (Sheet 5), prepared by WSP, 01 November 2024, REF HOF-WSP-ZZ-ZZ-DR-C-5005 REV P04
- Drawing: Infrastructure Drainage Layout (Sheet 6), prepared by WSP, 01 November 2024, REF HOF-WSP-ZZ-ZZ-DR-C-5006 REV P04
- Drawing: Infrastructure Drainage Layout (Sheet 7), prepared by WSP, 01 November 2024, REF HOF-WSP-ZZ-ZZ-DR-C-5007 REV P04
- Drawing: Infrastructure Drainage Layout (Sheet 8), prepared by WSP, 01 November 2024, REF HOF-WSP-ZZ-ZZ-DR-C-5008 REV P04
- Drawing: Infrastructure Drainage Layout (Sheet 9), prepared by WSP, 01 November 2024, REF HOF-WSP-ZZ-ZZ-DR-C-5009 REV P03
- Drawing: Infrastructure Drainage Layout (Sheet 10), prepared by WSP, 01 November 2024, REF HOF-WSP-ZZ-ZZ-DR-C-5010 REV P04
- Drawing: Infrastructure Drainage Layout (Sheet 11), prepared by WSP, 01 November 2024, REF HOF-WSP-ZZ-ZZ-DR-C-5011 REV P04
- Drawing: Infrastructure Drainage Layout (Sheet 12), prepared by WSP, 01 November 2024, REF HOF-WSP-ZZ-ZZ-DR-C-5011 REV P04
- Drawing: Infrastructure Drainage Layout (Sheet 13), prepared by WSP, 01 November 2024, REF HOF-WSP-ZZ-ZZ-DR-C-5013 REV P03
- Drawing: Infrastructure Drainage Layout (Sheet 14), prepared by WSP, 01 November 2024, REF HOF-WSP-ZZ-ZZ-DR-C-5014 REV P04
- Drawing: Infrastructure Drainage Layout (Sheet 15), prepared by WSP, 01 November 2024, REF HOF-WSP-ZZ-ZZ-DR-C-5015 REV P04
- Drawing: Infrastructure on Site Swale Sections, prepared by WSP, dated 01 November 2024, REF HOF-WSP-ZZ-ZZ-DR-C-5403 REV P02
- Drawing: Infrastructure Attenuation Basin Sections, prepared by WSP, 04 April 2025 REF HOF-WSP-ZZ-ZZ-DR-C-5401 REV P03
- Drawing: Infrastructure Infiltration Basins Sections, prepared by WSP, 01 November 2024, REF HOF-WSP-ZZ-ZZ-DR-C-5402 REV P02