



INFRASTRUCTURE DESIGN LTD

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Our Ref: IDL-1275-AW-02

AW Site Ref: 225505/1/0237460

6th February 2026

FAO: Anglian Water Pre-Development Team & North Hertfordshire District

Dear Sir,

RE: 25/01014/FP - Erection three storey building comprising 35no. retirement living apartments with associated communal areas, landscaping and parking following demolition of existing buildings. Land At Birchwood and Silverdale and Three Trees and Willow Close Old Charlton Road Hitchin Hertfordshire SG5 2AJ

We write in response to Anglian Water's holding objection regarding the proposed surface water discharge arrangements and the supporting evidence. The comments raised (shown in italics) are addressed below.

Anglian Water Comment:

There is no infiltration testing provided in accordance with BRE Digest 365, there is not sufficient evidence of why the nearby watercourse cannot be utilised which is 130m from the development site and is not considered an unreasonable distance (higher up the hierarchy).

There is no evidence provided of an existing connection, just an assumption due to the close proximity of a public surface water sewer that it connects and at an unrestricted rate. Anglian Water require CCTV evidence of an existing connection without restriction or existing connectivity plan, and all higher hierarchy evidence before a rate will be assessed and considered.

If the applicant believes the surface water hierarchy has been fully explored, they will need to engage with us and provide evidence that all other options have been exhausted and discounted in line with the Surface Water Hierarchy and with consultation with the LLFA.

Only when this engagement has taken place and an agreement issued by Anglian Water will we remove any objections

IDL Response

We acknowledge Anglian Water's request for further clarification. The submitted drainage strategy already provides a detailed assessment of these matters, summarised below for ease of reference.

1. Infiltration Feasibility (BRE 365 Compliance)

Crossfield Consulting undertook infiltration testing in May 2024. Results confirm:

- The site is underlain by fine-grained, low-permeability strata unsuitable for infiltration systems.
- Sand and gravel layers encountered contain a high proportion of fines, significantly limiting infiltration potential.
- Groundwater was encountered at approximately 3.5–4.0 m depth, providing insufficient unsaturated zone for infiltration SuDS.
- Falling-head tests confirmed very low infiltration rates, rendering soakaway systems unfeasible.

Conclusion: Infiltration is not feasible at this site in accordance with BRE Digest 365.

2. Feasibility of Discharge to the Nearby Watercourse

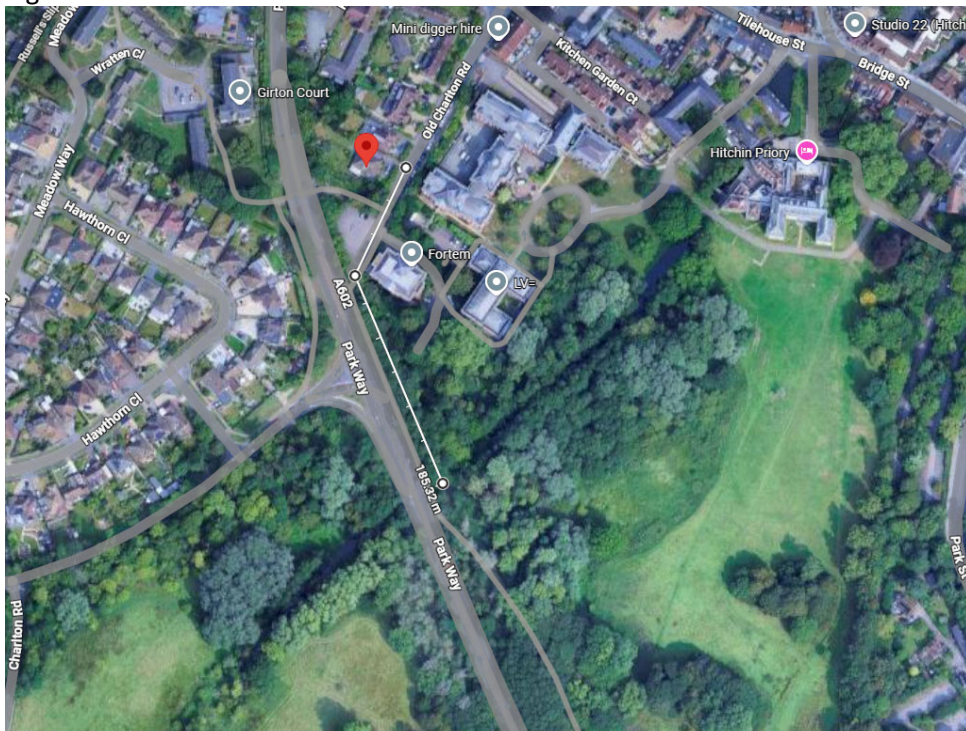
The nearest watercourse lies approximately 185 m south of the site. Refer to the Google map with the distance of the watercourse from the development site extract shown in Figure 1.

A gravity outfall would require:

- Construction of a long off-site drainage run across several third-party land parcels.
- Negotiation of multiple easements and legal agreements, which are uncertain and time-intensive.
- Potential deep excavation to maintain gradient compliance over the full 185 m length.
- Acceptance of long-term maintenance responsibility for an extensive off-site system.

Due to these combined engineering, legal, and commercial constraints, discharge to the watercourse is neither practical nor viable within the SuDS hierarchy.

Figure 2



3. Existing Drainage Arrangements and Proposed Connection

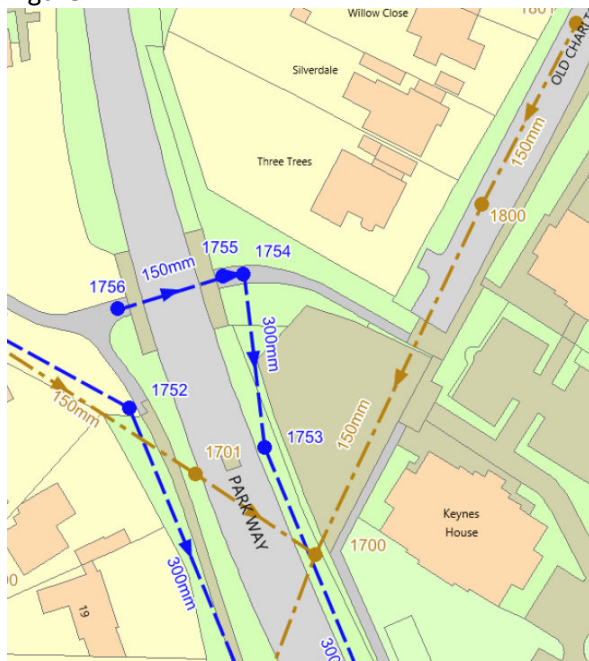
There is no confirmed evidence of an existing designated surface water connection from the current buildings to the Anglian Water surface water sewer. Based on on-site observations, it is likely that roof and hardstanding runoff currently enters the foul sewer, which is typical of older developments.

The proposed strategy provides a clear improvement:

- Surface water will be fully separated from the foul system.
- Discharge will be restricted to greenfield runoff rates, representing a substantial reduction compared with the current uncontrolled scenario.
- Surface water will discharge to AW manhole 1754, a suitable surface water sewer running south of the site. Refer to the Anglian Water sewer map extract shown in Figure 2.

This results in a significant betterment to the public sewer network by reducing hydraulic loading on the foul system, enhancing operational capacity and resilience under intensified rainfall conditions.

Figure 2



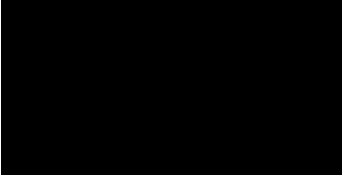
Conclusion

We trust the above clarifies the basis of the proposed drainage strategy and addresses the issues raised by Anglian Water.

We remain committed to working collaboratively to resolve any outstanding queries and progress agreement on the surface water discharge arrangements. Given infiltration constraints and the impracticality of discharging surface water runoff into the watercourse, the most viable option is to discharge it into the Anglian Water sewer at greenfield runoff rates. The proposed connection point is Anglian Water manhole 1754, which runs southwards from the site.

Should you require further information or clarification, please do not hesitate to contact us.

Yours faithfully,



Brijesh Mistry

For and on behalf of **Infrastructure Design Ltd**