

Growth & Environment

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

Your ref: 26/00558/HYA
Date: 10 July 2026

Dear Paul

RE: Hybrid application for a mixed-use development to provide a total of up to 230 dwellings, a residential care home (Use Class C2), an Independent Special School (ISS) and new sports pitch, with access from Bedford Road, landscaping, parking and SuDS comprising: Phase 1 Application for full planning permission for the erection of 100 dwellings, an ISS, new sports pitch and associated parking, landscaping, open space and SuDS; Phase 2 An outline application on the remaining part of the site for the erection of up to 130 dwellings, a residential care home (Use Class C2) and associated works with access from Bedford Road (all matters reserved apart from access) - Land at Pound Farm Bedford Road Ickleford Hertfordshire SG5 3RS

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

This is a hybrid application with phase 1 being a full application for a school and 100 dwellings. Phase 2 is an outline application for 130 dwellings, a care home and open space. There are ordinary watercourses bounding the site to the north and east. The SuDS provided rely on sewers with some swales and two large basins.

Whilst the application has provided a lot of information there are updates required to the FRA and Drainage Strategy for both phases. Further information is required on the risk of flooding from the ordinary watercourses, if the watercourses can be improved or naturalised as part of the development, interception of rainfall runoff and updated drainage modelling results using up to date rainfall parameters.

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

- The development is at risk of surface water flooding and or fluvial flooding from an ordinary watercourse.

- The proposed SuDS are likely to increase the risk of flooding elsewhere.
- The development is not in accordance with NPPF, PPG or Local Plan Policies of North Herts Council.

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.

1. The risk of flooding from the ordinary watercourses should be assessed and ensure that any flooding during a 1% AEP plus climate change event does not impact and access / egress (via new watercourse crossings); that all vulnerable development is outside the flood area; and flood risk is not increased elsewhere. This assessment may include a simple modelling approach to assessing the catchments of the watercourses, flow expected and modelling of the channels seen on the topographic survey.
2. We would welcome any opportunity to naturalise the watercourses to improve biodiversity and amenity along with low and high flow management. Clarification is also required if the culvert at the northern end of the site (Pound Farm) will be replaced or upgraded. If so, an assessment that does not increase the risk of flooding may be required.
3. Evidence is required to show that the watercourse to the north of the site, where the SuDS will discharge, is connected to the wider watercourse network. This may include topographic information, walk over survey and photographs.
4. The Drainage Strategy will be updated to include more details on interception. Whilst it is indicated that water can be held within the basins, it is unclear how this will not leave the site during an everyday rainfall event. It should be highlighted as to why more source control measures can't be included. Additional measures could include enhanced tree pits and bio-retention areas within the site rather than relying on sewers to a large pond. It is noted that all SuDS features will be unlined which will assist with interception.
5. Updated drainage modelling. calculations to include all SuDS features and to use FEH13 or FEH22 rainfall parameters within the simulation settings. Currently the calculations use FSR and FEH99 within the simulation (as currently only FEH22 is used in the initial set up of the model). We also require the CV values are set to 1 for all impermeable areas (both winter and summer values) that contribute to the drainage network (as per the HR Wallingford guidance on the calculation of storage calculations). If there are large areas of open space which is draining formally to the drainage network these should be

identified and included within the drainage calculations with an appropriate permeability value.

6. It should be noted that Hertfordshire request QBar or 2l/s/ha (not 3l/s/ha) is used in greenfield runoff calculations for any updates.
7. Updated drawings and documents are requested to be submitted including the above.

Informative

For further advice on what we expect to be contained within the FRA and/ or a Drainage Strategy to support a planning application, please refer to the Validation List and 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 Flood Risk Management 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 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.

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

Elaine

Elaine Simpson
Senior SuDS and Watercourses Support Officer
Growth and Environment