

Growth & Environment

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

Your ref: 25/03234/FP
Date: 23 September 2026

Dear Paul

RE: Creation of 50 no. one, two, three and four bedroom houses and apartments plus associated landscaping, open space, roads, drainage and other infrastructure - Land East Of Bedford Road And North Of The Priory School Hitchin Hertfordshire

Thank you for your consultation on the above site, received on 25 June 2026. We have reviewed the application as submitted and wish to make the following comments.

This is a full planning application for development of 50 houses/apartments and associated amenities. The site is currently greenfield and is located in Flood Zone 1; however, a surface water flow path crosses the site. Bespoke two-dimensional surface water modelling has been undertaken to assess baseline and post-development scenarios, including the 1% AEP rainfall event plus 40% climate change allowance, in accordance with current national guidance. However, we have concerns that the submitted mitigation strategy is not sufficiently robust. The proposed flood mitigation swale appears to be located in the same area as proposed buildings and parking, raising concerns regarding deliverability, exceedance routing, maintenance access and long-term operation. In addition, the culverted sections of the flood mitigation swales do not appear to have been assessed for full blockage. These sections would require active inspection and maintenance, and this should be clearly demonstrated and include details as to why this area cannot remain open.

The drainage strategy also does not demonstrate compliance with the National Standards for Sustainable Drainage Systems. It relies predominantly on an end-of-pipe drainage approach rather than applying the SuDS hierarchy and wider SuDS principles, including source control, interception, treatment, amenity, biodiversity and managing runoff close to where rainfall lands. The modelling and drainage calculations also appear to rely on incorrect parameters, which may underestimate water volumes and consequently underestimate the risk of flooding to the site and surrounding area.

Furthermore, part of the proposed road drainage does not appear to pass through any form of SuDS treatment prior to discharge. This would not provide sufficient water-quality treatment and could result in a deterioration in water quality downstream.

We **maintain our objection** to this planning application in the absence of an acceptable Drainage Strategy or and supporting information relating to:

- 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 and avoid increasing flood risk elsewhere, in accordance with the updated National Planning Policy Framework published in August 2026 Policy 18, section F5, F7 and F8, together with the Planning Practice Guidance and the National Standards for Sustainable Drainage Systems. The submitted information has not demonstrated the satisfactory management of local flood risk, surface water flow paths, storage, treatment and disposal of surface water from the site for the lifetime of the development, including operation and maintenance of SuDS and culverted mitigation features.

We will consider reviewing this objection if the following issues are adequately addressed.

1. Updated surface water flood mitigation design that clearly shows the swales are not to be located where buildings, gardens, parking areas are located and that these areas are always maintainable with an appropriate buffer strip adjacent to them. Justification is required as to why some areas are culverted. Modelling needs to be updated to demonstrate the impact of blockage on the culvert if the structure cannot be removed ensuring flood risk is not increased to the site or surrounding area. The current flood mitigation does not **ensure** that occupiers and users would remain safe from current and future surface water flood risk for the lifetime of the development without increasing flood risk elsewhere and would also require active regular maintenance for the lifetime of the development.
2. Infiltration testing (BRE 365 or similar) and groundwater monitoring to be submitted to justify that infiltration is not viable.
3. The current scheme does not comply with the National Standards for Sustainable Drainage Systems, specifically Principle 3 and the SuDS approach. A revised scheme is required that demonstrates accordance with all relevant standards and follows the SuDS approach by incorporating source-control surface features throughout the development, including measures to manage rainfall close to where it lands, and demonstrates no discharge from the site for the first 5mm of rainfall.
4. Greenfield runoff rates assume the entire site will be discharging through the proposed drainage system whilst large permeable and landscaped areas are

unable to drain into the system due to their location and therefore if infiltration is demonstrated to be unviable the rate should be reduced to account for this.

5. An updated drainage strategy with supporting calculations including the complete pipe network and structures, FEH (either FEH13 or FEH22) is required as the rainfall method as required in the National Standards for Sustainable drainage systems . Other parameters must include the CV value of 1, urban creep and the new allowances of climate change. The simulations are expected to include 100% AEP (1:1 year), 3.33% AEP (1:30 year), 3.33% AEP (1:30 year) with climate change allowance, 1% AEP (1:100 year) and 1% AEP (1:100 year) with climate change allowance events. Supporting calculations must include all conveyance and storage structures (including permeable paving). The labels in drainage drawings should match the labels in the supporting calculations.

Informative

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

Aswathi

Aswathi Haridasan
SuDS and Watercourses Support Officer
Growth and Environment

Annex

The following documents have been reviewed.

- Flood Risk Assessment-Bedford Road Hitchin, by Arcadis, 5 December 2025, 0203467-ARC-YYY-XX-TR-DH-00003 and P01.
- Technical Note Drainage Strategy, Levee Consulting, 14 May 2026.