

Naomi Reynard
Local Planning Authority
North Herts Council
Council Offices
Gernon Road
Letchworth Garden City
Hertfordshire
SG6 3JF

**Lead Local Flood Authority
Growth and Environment
Hertfordshire County Council
Post Point CHN 215
Farnham House
Six Hills Way, Stevenage
HERTFORDSHIRE, SG1 2ST
www.hertfordshire.gov.uk**

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

Date 5 September 2025

Dear Ms Reynard

RE: 25/01860/DOC - Details reserved by Condition 30 (Surface water drainage) of planning permission reference 22/02628/FP granted on 17 March 2025 - Land at 1-36 Freemans Close Hitchin Hertfordshire SG5 2PA

Thank you for your consultation on the above site, received on 31 July 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 30.

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. The construction drainage drawing is missing some detail that we would expect to see to ensure it aligns with the approved strategy from 22/02628/FP. There are no cover or invert levels shown for the majority of the drainage components and no pipe sizes are indicated. In addition, there appears to be a tank in the north-east corner of the site, but no dimensions are listed. The main central attenuation tank appears to provide around 228m³ of storage, whereas in the approved strategy at the full application stage, it was proposed to provide around 304m³. As a result of this discrepancy and the lack of detail on the drainage plan, drainage calculations for the 3.33% AEP and 1% AEP (plus climate change) events should be provided to justify the changes in the drainage design.

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 For the avoidance of doubt the use of FSR and FEH1999 data has been superseded and therefore, use in rainfall simulations are not accepted.

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;

- Drawing: Drainage Design, Infrastruct CS Ltd, July 2025
- Drawing: Levels Design, Infrastruct CS Ltd, July 2025

For reference, Condition 30 wording is as follows:

Prior to the commencement of development, construction drawings of the surface water drainage network, associated sustainable drainage components and flow control mechanisms and a construction method statement shall be submitted and agreed in writing by the local planning authority. The scheme shall then be constructed as per the agreed drawings, method statement, FRA & Drainage Strategy (Flood Risk Assessment and Surface Water Drainage Strategy, prepared by Ingent Consulting Engineers, dated 31 January 2023) and remaining in perpetuity for the lifetime of the development unless agreed in writing by the Local Planning Authority. No alteration to the agreed drainage scheme shall occur without prior written approval from the Local Authority.

Reason: To ensure that the development achieves a high standard of sustainability and to comply with NPPF and Policies of North Herts Council.