

Growth & Environment

Ms Saffron Loasby
Local Planning Authority
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Lead Local Flood Authority
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Contact: SuDS and Watercourses Team
FRMConsultations@hertfordshire.gov.uk

Your ref: 26/01070/FP
Date: 24 August 2026

Dear Ms Loasby

RE: External alterations to windows and doors, roof alterations with installation of inset balconies and dormer windows, hard and soft landscaping alterations to include replacing existing grassed area with rear terrace and installation of steps, installation of side terraced area and installation of refuse storage and cycle stores and installation of external lighting - Pease House, Tilehouse Street, Hitchin, Hertfordshire, SG5 2DX

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

The application has provided a Flood Risk Assessment (FRA) Technical Note (TN) that indicates the site along the eastern boundary is at risk of flooding from the River Hiz (non-main river ordinary watercourse) in the climate change 2070-2125 timeframe and is at significant risk from surface water flooding in the present-day scenario and climate change 2061-2125 timeframe.

Section 6 of the FRA TN states that 'The surface water drainage of the site will need to be addressed as part of a site-wide sustainable drainage (SuDS) strategy' and Section 7 of the FRA TN states, 'A sustainable drainage (SuDS) strategy will need be prepared to offset the increases in drained surface water runoff from the site as a result of the proposed development changes.' No information has been provided by the applicant to action the above and identify how the proposals are going to manage surface water runoff considering the existing and future flood risk to the site and in line with the requirements of the National Standards for SuDS.

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 Section 18: Policies F7, F8, N2(1e), 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. The applicant should provide sufficiently detailed information to support the proposed surface water drainage strategy that is proportionate to the development proposals. Information to support the surface water drainage strategy should include, but not limited to, the below points:

1. The discharge location hierarchy has not been sufficiently evidenced. The discharge hierarchy is set out in the National Standards for SuDS 2025 (now required by NPPF) and should be followed in relation to the surface water drainage strategy for this site.
2. Be in line with the four pillars of SuDS and the National Standards for SuDS, the design should include water quantity and quality benefits as well as biodiversity and amenity benefits as part of the surface water drainage provision in open and above ground SuDS across the site.
3. Provide pre-development greenfield and existing brownfield runoff rates and volumes need to be provided.
4. Provide comprehensive assessment and provision of sufficient mitigation to ensure that the proposals do not increase the risk of flooding to existing offsite properties and infrastructure. For a 3.3% annual exceedance probability (AEP) event (1:30) plus climate change allowance no flooding should occur on any part of the site. For the 1% AEP event plus climate change allowance there should be no flooding except in areas designated to hold or convey water as part of the design. The design should comply with the National Standards for SuDS, use conservative design parameters and be fully evidenced within the submitted information.
5. If any buildings are proposed (we are currently unaware of any proposed buildings) they should have a minimum freeboard of 300mm between the maximum design water level from any source of flooding and 150mm from the proposed external ground level, whichever is more conservative.

6. Following confirmation of the discharge location hierarchy, if the applicant proposes to discharge surface water via the existing surface water drainage network to the River Hiz riparian ownership or third-party landowner approval should be confirmed.
7. Include exceedance flow information to indicate where flood water will flow during exceedance storm events or network failures. Although exceedance flows are able to migrate off-site, exceedance flows should not increase risk to the site or to off-site property, highways or water sensitive infrastructure.
8. Information should be provided on how the drainage features are to be maintained for the lifetime of the development, including required activity, activity frequency and responsibility of maintenance.
9. The development proposals should be supported by a suitably detailed construction phase surface water management plan.

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
Pranav

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SuDS and Watercourses Support Officer
Growth and Environment

Annex

The following documents have been reviewed:

- Report: Flood Risk Assessment, Water Environment, April 2024