

Growth & Environment

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

Your ref: 25/02885/OP
Date: 18 December 2025

Dear Anne

**RE: 25/02885/OP- Erection of up to 41 dwellings with associated infrastructure and open space (all matters reserved except means of access).
Land At Mill Lane, London Road, St Ippolyts, Hitchin, SG4 7NN**

Thank you for your consultation on the above site, received on 26 November 2025. We have reviewed the application as submitted and wish to make the following comments.

This is an outline application for 41 houses with all matters reserved except for access. We understand that the proposed method of surface water discharge is through infiltration via 2 infiltration basins.

We welcome that this application has the potential to reduce the flood risk because of the proposed drainage strategy in the Flood Risk Assessment. However, it is important that certain details are confirmed to ensure that the most appropriate drainage scheme can be implemented to ensure there will be no flood risk to the site and the surrounding area and to demonstrate that an appropriate scheme using the key principles of SuDS are feasible.

Unfortunately, a drainage scheme layout has not been provided making it unclear how surface water will be managed for individual properties. A separate drainage plan should be submitted to the LPA for the LLFA to be able to review

As a result, we **object** to this planning application in the absence of an acceptable Flood Risk Assessment (FRA) and supporting information relating to:

- The proposed SuDS are likely to increase the risk of flooding elsewhere.
- The development not complying with NPPF, PPG.

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 review this objection if the following issues are adequately addressed.

- Surface Water Drainage Statement (SWDS) is referred to in the Flood Risk Assessment, but a document with this title is not available on the planning portal. We request that this is submitted as it may resolve concerns listed below.
- An outline drainage strategy which includes a commitment to providing appropriate SuDS in line with the National Standards for SuDS.
- This should include a drainage plan including location of SuDS features, showing the strategic infiltration basins and main surface water conveyance measures for the scheme.
- We welcome the reference to source control SuDS such as permeable paving and green roofs. The drainage strategy should explore the use of source control measures throughout the site, such as rain gardens, swales, SuDS planters and tree pits.
- Where infiltration is proposed, evidence of ground conditions/ underlying geology and permeability including BRE Digest 365 compliant infiltration tests should be provided.
- Calculations of greenfield runoff rates and post development calculations and/or modelling in relation to surface water are to be carried out for all rainfall events up to and including the 1 in 100 years including an allowance for climate change.

The applicant should submit a clear drainage scheme plan to the LPA so that an assessment can be made of the proposed drainage scheme for the site. We will be able to advise further following this.

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 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,

Maryam Daniyan

Flood and Water Project Officer
Growth and Environment

Annex

The following documents have been reviewed.

- Report: Flood Risk Assessment, by WSP, October 2025, reference - UK0028795.1577 and revision 1.