

Alex Howard
Local Planning Authority
North Herts Council
Council Offices
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Letchworth Garden City
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 Watercourse Team
Email: FRMConsultations@hertfordshire.gov.uk

Dear Alex,

Date 12 September 2025

RE: 25/01514/FP - Erection of shop, forecourt canopy, car and jet wash, car and cycle parking, EV vehicle charging points, hard and soft landscaping, and bin stores following demolition of existing buildings. Whitehorse Service Station Clothall Road Baldock Hertfordshire SG7 6PD.

Thank you for your consultation on the above site, received on 14 August 2025. We have reviewed the application as submitted and wish to make the following comments.

This is a full application, and the applicant would like to submit an acceptable Flood Risk Assessment and Drainage strategy.

We **object** to this planning application in the absence of an acceptable Flood Risk Assessment or / and 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 North Herts local policies including Policy NE8 – Reducing Flood Risk.

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 issues highlighted below are adequately addressed:

- 1) The hydraulic calculations indicate the inclusion of a soakaway tank (infiltration into the ground); however, the drainage strategy specifies that no infiltration into the

ground will occur, and the attenuation tanks are identified as lined permeable paving systems. Please can the clarify whether the proposed discharge is to ground or to a surface water sewer. Should the discharge be directed to ground, a suitable infiltration assessment must be provided in accordance with the requirements of BRE365.

- 2) Consent must be obtained from the sewerage undertake for any discharge into their infrastructure, and this consent must explicitly authorise a discharge rate of 2 l/s.
- 3) Exceedance of the design 1% AEP rainfall event plus climate change (or failure of the drainage network) must be shown on a drawing, minimising impacts to people and property. This drawing will include proposed external ground levels, finished floor levels and any designed slopes on impermeable surfaces such as car parks.
- 4) A high-level assessment of how water quantity and water quality will be managed during the construction phase is required.
- 5) High level assessment of the maintenance of any SuDS features and structures is provided but who will be adopting these features for the lifetime of the development must be confirmed.

Points 5 and 6 can be required under condition if not available at this stage.

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.

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,

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BHUKYA VEERANNA
SuDS and Watercourses Support Officer
Growth and Environment

Annex

The following documents have been reviewed.

- **Report:** Combined Flood Risk Assessment and Drainage strategy by Civilistix dated 12 August 2025 with reference 2-294 revision P1.