

Our Ref: 25079-FRA-CO-01 C01
Your Ref: 26/01070/FP

26 August 2026

Ms Saffron Loasby
Local Planning Authority
North Herts Council
PO Box 10613
Borehamwood
Hertfordshire
WD6 1WA

Water Environment Limited
6 Coppergate Mews
Brighton Road
Surbiton
London
KT6 5NE

Tel: 020 8545 9720

www.WaterEnvironment.co.uk

Dear Ms Loasby,

PEASE HOUSE, TILEHOUSE STREET, HITCHIN, SG5 2DX
RESPONSE TO LLFA OBJECTION LETTER DATED 24/08/2026

This letter responds to the letter dated 24th August 2026 from Hertfordshire County Council, as the Lead Local Flood Authority (LLFA), in which they objected to the planning application (ref: 26/01070/FP) based on the Flood Risk Assessment (FRA) submitted.

The FRA submitted appropriately assessed the risk of flooding to the proposed development. The LLFA has not identified any deficiency in the FRA's assessment of the existing fluvial or surface-water flood risk; its objection relates principally to the level of detail provided on the proposed surface-water drainage arrangements.

The main (Pease House) building is to be retained unchanged in terms of surface water drainage (i.e. no change in roof area); however, the application does include small areas of proposed paving associated with the new individual entrance associated with proposed residential units in the building, as well as two new small, roofed areas (the bin store and bike shed). The FRA does state that the proposed removal of the existing footpath may offset some of the increase in hardstanding (paved areas).

The proposed addition potential runoff areas are small and distributed/isolated around the existing building. It would therefore not be practicable to design and install a separate SuDS drainage system for these areas in isolation (assuming infiltration is not possible).

A review of the British Geological Society (BGS) maps shows that the site is underlain by Sand and Gravel superficial deposits and Chalk bedrock. As such, it may be feasible for the proposed new hardstanding areas to use permeable paving (where appropriate) or drain roof and impermeable surfaces to adjoining infiltration soakaways. In accordance with the national standard for SuDS, this approach would be prioritised where possible.

If infiltration is not possible, then the runoff from any new hardstanding and roof areas would be drained to the existing surface water system serving Pease House, which would then discharge into the River Hiz. It is considered likely that any existing surface water drainage system would not be serving Pease House in isolation but would also be draining the adjoining buildings and hardstanding areas of Radcliffe House and Keynes House. Mitigating the impact of each new runoff area individually would not be practical. As such, any increases may be offset by improvements to the existing surface water drainage system.

The FRA concludes that a sustainable drainage (SuDS) strategy can be prepared and submitted to satisfy an appropriate planning condition, which we consider the appropriate path forward given the information available at the time of this application. The proposed change in drained runoff is small, and any change in runoff from the site would be small compared to drainage of the existing development. As such, adopting this approach should pose no risk.

To further support this submission, we provide the following responses to the nine points identified by the LLFA where they considered additional supporting information should be submitted:

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.

Infiltration feasibility will be confirmed at detailed design stage and, if it is demonstrated to be unsuitable, discharge to the existing surface-water network will be considered in accordance with the drainage hierarchy.

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.

Given the very low pollution hazard associated with pedestrian paving and roof drainage and the limited/dispersed nature of the works, the scope for standalone above-ground SuDS is constrained, but the detailed strategy will nevertheless consider the four pillars in a proportionate manner, including permeable paving, planting and infiltration where practicable. The soft landscaping scheme includes various ecological enhancements that are described in more detail in the Landscape Design Statement and BNG Assessment submitted as part of the planning application.

3. Provide pre-development greenfield and existing brownfield runoff rates and volumes need to be provided.

The net increase in impermeable area is very limited, and the necessary calculations can be undertaken once the detailed drainage solution is confirmed.

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.

The detailed drainage strategy will demonstrate that any new impermeable areas will be managed so that they do not increase flood risk to the site or neighbouring properties. The final design will assess the relevant 3.3% AEP and 1% AEP events, including appropriate climate change allowances, and identify any local storage, conveyance or exceedance arrangements required to satisfy the National Standards for SuDS.

The fluvial and catchment surface water flood risk is addressed in the FRA.

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.

No new habitable buildings are proposed as part of the application. Extant prior approval consent is already in place for the conversion of Pease House from office to residential use, with appropriate flood risk mitigation measures included.

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.

If discharge to the existing surface water drainage network is required, the applicant can confirm the relevant drainage route, outfall arrangements and any necessary riparian ownership approvals as part of the detailed drainage strategy. This would be appropriate once the preferred discharge method has been confirmed through infiltration testing and drainage design.

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 offsite property, highways or water sensitive infrastructure.

Given the small and distributed nature of the additional runoff areas, exceedance flows are expected to follow existing site gradients. The FRA has already assessed the principal catchment exceedance pathways and demonstrated that the proposed walls/regrading will direct flows away from Pease House. The only element remaining is an exceedance plan for the detailed drainage system, which logically cannot be finalised until that system is designed. An exceedance flow plan will be provided as part of the sustainable drainage strategy.

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.

A maintenance schedule can be prepared for the final drainage features and submitted with the detailed drainage strategy. This would set out the required inspection and maintenance activities, their frequency, and the party responsible for maintaining any permeable paving, soakaways, gullies, channels or other drainage assets for the lifetime of the development.

9. The development proposals should be supported by a suitably detailed construction phase surface water management plan.

Given the limited extent of the proposed new runoff areas, a detailed construction phase surface water management plan is not necessary. However, if required then the provision of the plan would be best provided to discharge an appropriate condition once planning approval has been granted.

In summary, the FRA has already assessed the existing fluvial and surface-water flood risks affecting the site and identifies appropriate measures to manage overland surface-water flows. The development would result in only a limited and distributed increase in impermeable area, with infiltration and permeable construction to be prioritised in accordance with the drainage hierarchy. There is therefore no technical reason why an appropriate surface-water drainage solution cannot be achieved. The outstanding matters identified by the LLFA relate principally to the detailed design, calculation, maintenance and construction of that drainage solution and can appropriately and proportionately be secured through a suitably worded planning condition. On this basis, we respectfully request that the LLFA withdraw its objection, subject to such a condition.

Yours sincerely,

David Mardon

David Mardon

MSc Eng, BSc Eng (Civil)

CEng, MICE

Associate

Encl.