

Growth & Environment

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

Lead Local Flood Authority
Hertfordshire County Council
Post Point CHN215
Farnham House
Six Hills Way, Stevenage
Hertfordshire SG1 2FQ
www.hertfordshire.gov.uk

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

Your ref: 25/02547/FP
Date: 13 January 2026

Dear Anne

RE: 25/02547/FP - Residential development of 36 no. dwellings including creation of vehicular access off Station Road, associated parking, drainage, amenity space and landscaping. Land South and West of Senuna Park, Station Road, Ashwell

Thank you for your consultation on the above site, received on 11 December 2025.

The site is a full application for 36 dwellings on the eastern edge of Ashwell, adjacent to the Senuna Park development.

The site contains an area of high surface water flood risk to the Northwest corner of the site. The development has the potential to improve the existing flooding issues.

We welcome the inclusion of the SuDS features proposed, such as permeable paving and the infiltration basins. However, we have concerns on the application that need to be addressed before we can consider the application to be acceptable in terms of flood risk.

Therefore, we **object** to this planning application in the absence of an acceptable Flood Risk Assessment (FRA) / supporting information.

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 issues highlighted below are adequately addressed.

The following points should be clarified and further information provided on the following:

1. **The SuDS hierarchy**, as stated in the National Standards for SuDS (2025) must be followed (see text below), where Priority 1 is given to water collected for non-potable use. Evidence of rainwater harvesting/re-use is not currently presented.

Standard 1: run off destinations

1.2 Run off from the development shall be discharged to the following final destinations, to the maximum extent practicable, in accordance with the below hierarchy:

- *priority 1: collected for non-potable use*
 - *priority 2: infiltrated to ground*
 - *priority 3: discharged to an above ground surface water body*
 - *priority 4: discharge to a surface water sewer, or another piped surface water drainage system*
 - *priority 5: discharged to a combined sewer*
2. **Highway drainage** – We understand the main spine road is to be traditionally drained via road gullies before discharge to the SuDS network. The SuDS hierarchy should be explored, including measures to drain the main road using source control SuDS in place of / in addition to traditional gullies. The Highway Authority may adopt SuDS features such as swales and rain gardens that only drain the highway – we would recommend Highways are approached to discuss.
 3. **Source Control measures** - While we welcome the use of above ground SuDS, the development first should consider the inclusion of source control measures to capture water at source, for example the use of rain gardens and SuDS planters to capture rainwater from downpipes. Further source control measures should be explored.
 4. **Basin design** – the basin slopes are given as 1 in 3 slopes. This is a minimum requirement. We would recommend slopes of 1 in 4 which will allow the area to function more as a multifunctional space. Consideration should be given as to how this basin might be made shallower and the space can be better incorporated into the development and used as a multifunctional space.
 5. **Confirmation of infiltration parameters** - In addition, reviewing the drainage strategy drawing and the main body of text - there is a mismatch between the infiltration rate noted on the design and used in the calculations (1.80×10^{-4} m/s) and the rate stated in the main body of text (8.31×10^{-5} m/s). The lower rate needs to be one that the design is based on at this stage, with further testing required (post permission). Also, from the infiltration results, it would appear that only one

trial pit was successful - TP8, which successfully recorded a rate in 3 tests at that location.

Advice

In addition to the above, we have the following advice in relation to the SuDS design which should be given consideration.

Swales – we would recommend the use of swales to convey water instead of underground pipes, where at all possible. This would have a water quality and ecological benefit and may reduce the need for headwalls into the basin area and allow it to function better as a play space/ multifunctional area.

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

Deborah Craig
SuDS and Watercourses Officer
Growth and Environment

Annex

The following documents have been reviewed.

- Flood Risk Assessment 2506 - 1025 Station Road Ashwell, INGENT Consulting Engineers, August 2025 (with appendices)