

Growth & Environment

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

Date: 7 January 2026

Dear Melissa

RE: 25/02260/FP - Temporary consent allowing for the erection of a detached food-to-go building (Greggs Pod) and other associated minor site alterations including the formation of vehicle parking for a period of two years (development already commenced) - Northway Filling Station, Great North Road, Hinxworth Baldock Hertfordshire SG7 5EX

Thank you for your consultation on the above site, received on 27 November 2025. We have reviewed the application as submitted and wish to make the following comments.

We have concerns that the submitted information does not meet with NPPF, PPG or the LLFA Flood Risk Management Strategy policies and the proposal will either increase the risk of flooding elsewhere or to the proposed development. We provide the following technical review for your consideration.

As this is a retrospective application, it remains unclear whether the applicant has constructed over an ordinary watercourse. The site is located within an area identified as being affected by surface water flooding; however, it is not evident whether this represents a defined flow path or static ponding which the drainage scheme would have to account for.

While fluvial flood modelling and mitigation measures may be sufficient, no supporting information has been provided to confirm this from the Environment Agency. Additionally, there is no evidence of attenuation features, watercourse treatment, or the inclusion of Sustainable Drainage Systems (SuDS) within the design. The submission also lacks details regarding the drainage system's capacity. Detailed drainage network calculation and its potential for multifunctional use.

The LLFA technical review includes.

1. Evidence is required to show that the existing ordinary watercourse has not been built over for land gain. Policy 8 of the Hertfordshire County Council Local Flood Risk

Management Strategy (2019) states that no construction should occur on top of a culvert.

2. A Flood Risk Assessment must be supplied to assess all sources of flooding at this location.
3. The hierarchy of sustainable surface water drainage has not been followed. Infiltration testing should be undertaken for the site, subject to the depth of the principal aquifer, prevailing groundwater levels, and the feasibility of separating clean roof water from runoff generated by the filling station areas. If infiltration was determined to be unviable, greenfield runoff rates should have been calculated. We expect runoff rates and volumes to be returned to greenfield (pre-development) conditions. Where this is not achievable, discharge rates must be reduced as close to greenfield as reasonably practicable or a relaxation factor applied if there is evidence that the site is brownfield.
4. No sustainable drainage features were proposed for the site. SuDS components such as green roofs, permeable paving, rain gardens, or swales should be incorporated wherever feasible. These features should be utilised; the absence of such measures does not align with best practice for sustainable surface water management.
5. All surface water drainage modelling calculations are required to be provided using FEH13 or FEH22 rainfall data in the simulation runs, FSR rainfall data is not acceptable. A CV value of 1 should also be included for all impermeable areas.
6. Upper end climate change allowance required to be used for the simulation of drainage network calculations for design flood events including the 3.3% AEP and the 1% AEP event.
7. A CCTV survey report should be submitted if any existing drainage is to remain as part of the development, this is to find out if it is suitable for reuse or if repairs are required. This would include tracing the existing drainage to an outfall and assessment of capacity considering the existing impermeable areas contributing to it. Any information must be included within any drainage modelling, in pre and post development scenarios.

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

Raima

Raima Prasad
SuDS and Watercourses Support Officer
Growth and Environment

Annex

The following documents have been reviewed.

- Proposed Retail Unit, Northway Service Station Great North Road, Hinxworth, Baldock Flood Risk Assessment, by Welcome Break, September 2025, reference NS_0178_02 and Rev no. V1.
- Proposed Retail Unit, Northway Service Station Great North Road, Hinxworth, Baldock Flood Warning & Evacuation Plan, by Welcome Break, September 2025, reference NS_0178_02 and Rev no. V1.