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TECHNICAL NOTE

Date: 26th March 2026

File Ref: GB/CC/P25-3474/03TN

Project: P25-3474 – Land at Ickleford Manor, Ickleford

Subject: Addendum report – Response to Parish Council Comments for the Proposed Development at Land south Of Turnpike Lane, Ickleford

1.0 INTRODUCTION

- 1.1 This Technical Note provides a formal response to the Parish Council (PC) queries set out in their letter (Appendix A) dated 16th March 2026.
- 1.2 This document addresses flooding and drainage concerns by the PC near the proposed development at Land South of Turnpike Lane, Ickleford Hertfordshire SG5 3XB (Ref: 25/02401/OP).

2.0 RESPONSE TO COMMENTS

PA Comment:

“We have submitted photographic evidence showing that flooding has recently affected neighbouring properties and the adjacent highway. This demonstrates the site’s vulnerability to surface water runoff and extreme rainfall events.”

- 2.1 The PC has not provided any verifiable details regarding the location, timing, extent, or circumstances of the photographs referred to in their document. In the absence of this contextual information, the evidential weight that can reasonably be attached to the images is limited.

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- 2.2 Based on the available information, it appears likely that the images relate to Bedford Road, where the River Oughton passes beneath the carriageway to the west of the Site. This location is hydraulically upstream of the proposed development Site.
- 2.3 The Environment Agency's Flood Map for Planning clearly identifies this section of Bedford Road as lying within Flood Zones 2 and 3. Flooding in this area is therefore not unexpected and does not, in itself, indicate abnormal conditions or provide evidence of flood risk affecting the application site.
- 2.4 Given its location within the fluvial floodplain, it is not appropriate to attribute observed flooding to surface water runoff without supporting evidence. The PC's conclusion in this regard appears to be speculative rather than evidence based.
- 2.5 National surface water flood mapping does identify some risk at Bedford Road; however, this is confined primarily to the southern side of the River Oughton. The proposed development is located on the opposite side of the valley and is not hydraulically connected to these mapped overland flow paths.
- 2.6 The development site itself lies entirely within Flood Zone 1 and is not identified as being at risk from either fluvial or surface water flooding. Furthermore, the submitted Flood Risk Assessment (FRA) and SuDS Report confirm that the site can be developed safely, with appropriate mitigation and drainage controls in place.
- 2.7 The existence of flooding at a nearby location does not automatically demonstrate vulnerability at the Site. Flood behaviour is governed by local topography, hydraulic connectivity, catchment characteristics, and the nature of the receiving water environment. In this case, the Parish Council's conclusion appears to conflate distinct flood mechanisms and locations without supporting technical evidence.
- 2.8 It should also be noted that the flooding referred to is understood to occur upstream of the Site. As a matter of basic hydraulic principle, the proposed development cannot reasonably be expected to influence upstream flood conditions. Any potential impact from a development site would only arise downstream, and only where drainage design failed to appropriately control discharge rates and volumes. That is not the case here.
- 2.9 The Environment Agency (EA) and the Lead Local Flood Authority (LLFA), as relevant statutory consultees, have reviewed the application and raised no objection in relation to flood risk or drainage. This confirms that the proposed development is appropriately located and that the submitted strategy is acceptable in technical and policy terms.
- 2.10 In summary, the photographic evidence referred to by the Parish Council does not establish any material relationship between the observed flooding and the proposed development, nor does it substantiate the concerns raised regarding the suitability of the Site.

PC Comment:

'We are extremely concerned that any runoff from the development could reach the River Oughton or the former trout pond on the site, which would increase flood risk downstream. The proposed drainage measures do not provide sufficient assurance that flooding will be adequately prevented.'

- 2.11 A comprehensive Sustainable Drainage System (SuDS) strategy has been prepared for the proposed development to ensure that surface water runoff is attenuated and controlled in accordance with national and local planning policy, including greenfield runoff principles where applicable.
- 2.12 The drainage strategy has been specifically designed to restrict discharge rates and manage runoff volumes such that the development does not increase flood risk on-site or elsewhere, including downstream receptors.
- 2.13 The PC's assertion that the proposals do not provide sufficient assurance is not supported by the statutory consultee position. The LLFA has reviewed the drainage strategy in detail and confirmed it to be acceptable.
- 2.14 The submitted drainage proposals are therefore consistent with the requirements of the National Planning Policy Framework and associated Planning Practice Guidance, which seek to ensure that development remain safe for its lifetime and does not increase flood risk elsewhere.

PC Comment:

"There is no guarantee that interim and temporary drainage measures during construction will prevent off-site flooding or pollution. Without such assurance, proceeding with development would exacerbate risks to the local community"

- 2.15 This planning application submitted under outline planning permission rules, and it is standard planning practice that construction-phase drainage, including pollution prevention, and surface water management measures are to be secured through appropriately worded planning conditions and construction management controls at the detailed stage.
- 2.16 It is therefore neither unusual nor inappropriate that detailed temporary construction drainage measures are not submitted or reviewed till after planning is awarded due to this being an outline application. Such measures are routinely secured through planning conditions and subsequently approved before a development commences.
- 2.17 The PC's expectation that such detail be provided at this stage is therefore misplaced.

PC Comment:

"The long-term maintenance and verification of SuDS and drainage features are uncertain. The Parish Council cannot support a development that may compromise safety and flood risk over its lifetime."

- 2.18 The requirement to demonstrate long-term management and maintenance of SuDS features is well established in national policy and guidance and has been a core component of drainage design and review since 2015.
- 2.19 Details relating to the long-term management and maintenance of the proposed drainage features have been set out within the submitted FRA and SuDS Report.
- 2.20 These proposals have been reviewed by the LLFA, which has raised no concerns in relation to their acceptability. The Parish Council's suggestion that long-term performance is "uncertain" is therefore not supported by the submitted technical evidence or by the statutory consultee response.

PC Comment:

"The proposed site layout and Finished Floor Levels do not adequately mitigate flood risk. Without robust design and enforcement, new dwellings and infrastructure would remain vulnerable to extreme weather events."

- 2.21 This concern is expressed in general terms and is not supported by any site-specific technical evidence.
- 2.22 The proposed layout and Finished Floor Levels have been prepared on an indicative basis at this stage and have been informed by all relevant sources of flood risk. The site is located outside the modelled floodplain, as demonstrated within the FRA and SuDS Report. The detailed site layout will be confirmed at the Reserved Matters stage, at which point the surface water drainage strategy will be developed to reflect the finalised layout.
- 2.23 The relevant statutory consultees have reviewed the submitted information and have not raised any objection on this basis. Accordingly, there is no technical justification to conclude that the proposed layout or finished floor levels are inadequate.

PC Comment:

"The development would place an unacceptable burden on local infrastructure, services, and the surrounding environment. Given the history of flooding and the sensitivity of the watercourses nearby, this site is unsuitable for residential development."

- 2.24 The submitted FRA and SuDS Report clearly demonstrates that the development is safe from flooding and has been designed with appropriate regard to the surrounding water

environment, including the incorporation of suitable water quality treatment and surface water control measures.

- 2.25 It is important to distinguish between existing flood risk issues in the wider area and the responsibilities of new development under national planning policy. The relevant policy tests are whether the proposed development can be made safe for its lifetime without increasing flood risk elsewhere. The submitted technical evidence demonstrates that these tests are satisfied.
- 2.26 The PC's reliance on the known flooding at Bedford Road, upstream of the development site, as a basis for objection does not establish that the application Site is unsuitable for development. The flooding appears to relate to localised conditions associated with the existing watercourse crossing and surrounding the floodplain. Any reduction in flood risk at this location would require site-specific interventions such as culvert maintenance, clearance, or capacity enhancements, rather than the restriction of a downstream development on an unrelated and hydraulically separate Site.
- 2.27 In addition, Anglian Water has confirmed that there is adequate capacity within the foul network to accommodate the proposed development.
- 2.28 Overall, the application is supported by a robust technical evidence base, is compliant with relevant flood risk and drainage policy, and has been found acceptable by the relevant statutory consultees, including the EA and LLFA.

3.0 SUMMARY

- 3.1 This Technical Note responds to the PC's comments dated 16th March 2026 in relation to the proposed development at Land South of Turnpike Lane, Ickleford Hertfordshire SG5 3XB (Ref: 25/02401/OP).
- 3.2 The concerns raised by the PC are not supported by the site-specific evidence in the submitted FRA and SuDS Report and, in several instances, appear to arise from incorrect assumptions regarding flooding mechanisms, hydraulic connectivity, and the relationship between the Site, and other locations in the catchment which experience flooding.
- 3.3 The proposed development is located within Flood Zone 1, incorporates a policy-compliant SuDS to manage and control surface water which has been reviewed and accepted by the relevant statutory consultees. The development will not increase flood risk either on-site or elsewhere.
- 3.4 The documented flooding at Bedford Road by the PC is unrelated to the proposed development site and reflects existing localised conditions associated with the River Oughton crossing and surrounding floodplain. This location of flooding is upstream of the development

site, which cannot be mitigated by the development. Any mitigation of flooding at that location would need to be addressed through separate local infrastructure measures.

- 3.5 It is therefore concluded that the PC's objections on flood risk and drainage grounds are not substantiated by evidence related to the development site, and do not provide a sound technical basis to resist the proposed development.

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