

Melissa Tyler
North Hertfordshire District Council
Gernon Road, Letchworth Garden City,
SG6 3JF

Reference: PA-0002309/01
Customer reference: 26/00701/FP
1 May 2026

Change of use of existing ground floor office into one dwelling (development already carried out).

**The Office the Old Forge Church Lane Graveley Hitchin Hertfordshire SG4 7LR
SG47LR**

Dear Melissa

Thank you for contacting us regarding this application. Having reviewed the information submitted the site lies in both flood zones 3 and 3b (the functional flood plain). And as a result, we have the following two objections.

Objection 1

We object to the proposed development as it falls within a flood risk vulnerability category that is inappropriate to the Flood Zone in which the application site is located. The application is therefore contrary to the NPPF and planning practice guidance (PPG). We recommend that planning permission is refused on this basis.

Reasons

NPPF Annex 3 classifies development types according to their vulnerability to flood risk. PPG Table 2 provides guidance on which developments are incompatible with certain Flood Zones. This site lies within Flood Zone 3b functional floodplain, which is land defined by your Strategic Flood Risk Assessment as having a high probability of flooding.

The proposed development is classed as more vulnerable in accordance with Annex 3 of the NPPF. Table 2 of PPG makes it clear that this type of development is not compatible with this Flood Zone and therefore should not be permitted.

Overcoming our objection

The functional floodplain layer is defined by North Herts through their Strategic Flood Risk Assessment (SFRA) and is defined as Land where water has to flow or be stored in times of flood. Unless the applicant can show that the site is not in fact in the functional flood plain this objection cannot be overcome.

Should the applicant be able to come to an agreement with the Local authority where they agree that the sites is in fact not in the function flood plain, then the following objection will also need to be resolved.

Objection 2

In the absence of a flood risk assessment (FRA), we object to this application and recommend that planning permission is refused.

Reasons

The application site lies within Flood Zone 3, which is land defined by the planning practice guidance as having a high probability of flooding. The NPPF (paragraph 181, footnote 63) and the Flood Risk and Coastal Change Planning Practice Guidance (paragraphs 20 and 21) states that an FRA must be submitted when development is proposed in such locations.

An FRA is vital to making informed planning decisions. In its absence, the flood risks posed by the development are unknown. This is sufficient reason for refusing planning permission.

Overcoming our objection

To overcome our objection, the applicant should submit an FRA which demonstrates that the development is safe without increasing risk elsewhere. Where possible, it should reduce flood risk overall.

If this cannot be achieved, we are likely to maintain our objection. Please re-consult us if an FRA is submitted and we will respond within 21 days of re-consultation.

Guidance on how to prepare a flood risk assessment can be found at [Flood risk assessments: applying for planning permission - GOV.UK](https://www.gov.uk/guidance/flood-risk-assessments-applying-for-planning-permission).

Final comments

Thank you for contacting us regarding the above application. Our comments are based on our available records and the information submitted to us. Please quote our reference number in any future correspondence. Please provide us with a copy of the decision notice for our records. This would be greatly appreciated.

If you are minded to approve the application contrary to our objection, please contact us to explain why material considerations outweigh our objection. This will allow us to make further representations.

Should you have any queries regarding this response, please contact me.

Yours sincerely

Mr Kai Mitchell
Sustainable Places Planning Specialist

creating a better place
for people and wildlife



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