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North Hertfordshire District Council
Planning Control & Conservation
Council Offices Gernon Road
Letchworth Garden City
Hertfordshire
SG6 3JF

Our ref: NE/2026/139039/01
Your ref: 26/00006/FP

Date: 17 February 2026

Dear Sam,

Land To North of Stevenage Road Hitchin Hertfordshire.

Erection of 50no. Residential dwellings (including affordable) with public open space, associated parking, landscaping and access.

Thank you for consulting us on the above application on 30 January 2026. As part of the consultation, we have reviewed the following document:

- Document titled 'Flood Risk Assessment and Drainage Strategy' prepared by dha Planning, reference 34653/CS, dated November 2025

Environment Agency Position

In the absence of an acceptable Flood Risk Assessment (FRA), we **object** to this application and recommend that planning permission is refused.

Reasons for Objection

Our Flood Map for Planning shows the site lies partly within flood zones 2 and 3a, defined by the 'Planning Practice Guidance: Flood Risk and Coastal Change' as having a medium and high probability of flooding, respectively. In addition, the North Hertfordshire SFRA indicates that the site lies partly in flood zone 3b. The proposal is for residential dwellings, which is classified as a 'more vulnerable' development, as defined in the [National Planning Policy Framework vulnerability classifications](#).

The submitted FRA does not comply with the requirements for site-specific FRAs, as set out in paragraphs 20 to 21 of the Flood Risk and Coastal Change section of the Planning Practice Guidance (PPG) and its site-specific FRA checklist. Therefore, the FRA does not adequately assess the flood risks posed by the development.

The submitted FRA has failed to demonstrate:

1. That there will be no increase in flood risk elsewhere due to a loss of floodplain storage and/or impedance to flood water flows. We are particularly concerned about the ground level raising proposed (as shown in drawing 34653-TS-02 in Appendix F). This is not acceptable unless floodplain compensation can be provided to ensure no increases in flood risk elsewhere.

2. Consistency in the flood zone extents. The extent of flood zones 2 and 3 shown on drawing 34653-TS-02 appears different to the flood zones shown on our Flood Map for Planning. It therefore needs to be clarified how these flood zone extents have been determined.

As submitted, the FRA does not comply with paragraph 170 of the National Planning Policy Framework, and Policy NE7: Reducing flood risk of North Hertfordshire's Local Plan, (adopted November 2022), which requires any new developments to be safe from flooding for their lifetime, without increasing flood risk elsewhere.

Overcoming our Objection

To overcome our objection, the applicant should submit a revised FRA which addresses the points highlighted above. The FRA must demonstrate that the development will be safe for its lifetime and will not increase flood risk elsewhere. If this cannot be achieved, we are likely to maintain our objection.

We advise that can be completed in one of the following ways:

1. Modelling. The flood zones shown on our Flood Map in this area are based on our New National Model, which is a broadscale national model that should only be considered indicative. If any land raising is proposed within flood zone 2 and/or 3, detailed modelling of the adjacent ordinary watercourse could be undertaken to define the flood zone extents and depths at the site, to inform further floodplain compensation.
2. Take the flood zone 2 + CC extent (which is now provided within the Flood Map for Planning). Use a site-specific topographic survey to assess the area of floodplain within this extent which is being removed due to the raising of land and provide compensation for this. This could be done by taking the maximum height of the land being raised, presuming the flood would reach this height, and compensating for this. This compensation should be done on a level-for-level, volume-for-volume basis and by using a minimum of 300mm bands when assessing this volume.

Advice to applicant

Modelling

The watercourse would need to be modelled for a range of return period events, including the 3.3%, 1% (both with and without an allowance for climate change) and 0.1% annual probability events. The flood levels on the development site should be determined and compared to a topographic site survey to determine the flood extents and depths across the site. Please refer to the following guidance on river modelling for FRAs and modelling technical standards [here](#).

Floodplain compensation

The FRA will need to demonstrate that any loss of floodplain due to ground level raising within the 1 in 100-year flood extent, including an appropriate allowance for climate change, can be directly compensated for, on a volume-for-volume and level-for-level basis. This is necessary to prevent the new development reducing

floodplain storage and displacing flood waters, thereby increasing flood risk elsewhere.

We would expect calculations to be provided showing the volume lost to the development and the volume gained by the compensation area for a number of horizontal slices (usually 200mm thick) up to the 1 in 100 year flood level including an appropriate allowance for climate change.

Water Efficiency Advice

Increased water efficiency for all new developments potentially enables more growth with the same water resources. Developers can highlight positive corporate social responsibility messages and the use of technology to help sell their homes. For the homeowner lower water usage also reduces water and energy bills.

We endorse the use of water efficiency measures especially in new developments. Use of technology that ensures efficient use of natural resources could support the environmental benefits of future proposals and could help attract investment to the area. Therefore, water efficient technology, fixtures and fittings should be considered as part of new developments.

Residential developments

All new residential developments are required to achieve a water consumption limit of a maximum of 125 litres per person per day as set out within the Building Regulations 2010. We recommend that wherever possible and in areas of serious water stress (as identified in our report Water stressed areas - final classification) a higher standard of a maximum of 110 litres per person per day is applied. This standard may already be a requirement of the LPA. A higher standard may be required in future by some LPAs and these should be complied with where applicable.

Signing up for flood warnings

The applicant/occupants should phone Floodline on 0345 988 1188 to register for a flood warning or visit [Sign up for flood warnings - GOV.UK](https://www.gov.uk/sign-up-for-flood-warnings). It's a free service that provides warnings of flooding from rivers, the sea and groundwater, direct by telephone, email, or text message. Anyone can sign up.

Flood warnings can give people valuable time to prepare for flooding – time that allows them to move themselves, their families, and precious items to safety. Flood warnings can also save lives and enable the emergency services to prepare and help communities.

For practical advice on preparing for a flood, visit [Prepare for flooding: Protect yourself from future flooding - GOV.UK](https://www.gov.uk/prepare-for-flooding)

To get help during a flood, visit [What to do before or during a flood - GOV.UK](https://www.gov.uk/what-to-do-before-or-during-a-flood)

For advice on what do after a flood, visit [What to do after a flood - GOV.UK](https://www.gov.uk/what-to-do-after-a-flood)

Advice to Local Planning Authority

Sequential Test

What is the sequential test and does it apply to this application?

In accordance with the NPPF (paragraphs 175-177 (inc. footnote 62)), development in flood risk areas should not be permitted if there are reasonably available alternative sites, appropriate for the proposed development, in areas with a lower risk of flooding. The sequential test establishes if this is the case.

Development is in a flood risk area if it is in flood zone 2 or 3, or it is within flood zone 1 and your strategic FRA shows it to be at future flood risk or at risk from other sources of flooding such as surface water or groundwater.

The only developments exempt from the sequential test in flood risk areas are:

- Householder developments such as residential extensions, conservatories or loft conversions
- Small non-residential extensions with a footprint of less than 250sqm
- Changes of use (except changes of use to a caravan, camping or chalet site, or to a mobile home or park home site)
- Applications for development on sites allocated in the development plan through the sequential test and:
 - the proposed development is consistent with the use for which the site was allocated; and
 - there have been no significant changes to the known level of flood risk to the site, now or in the future, which would have affected the outcome of the test
- Developments where no built development within the site boundary, including access or escape routes, land raising or other potentially vulnerable elements, would be located on an area that would be at risk of flooding from any source, now and in the future

Avoiding flood risk through the sequential test is the most effective way of addressing flood risk because it places the least reliance on measures such as flood defences, flood warnings and property level resilience.

Who undertakes the sequential test?

It is for you, as the LPA, to determine an appropriate area of search and to decide whether the sequential test has been passed, with reference to the information you hold on land availability. You may also ask the applicant to identify any other 'reasonably available' sites which are on the open market and to check on the current status of identified sites to determine if they can be considered 'reasonably available'. Further guidance on the area of search can be found in paragraphs 027-030 of the planning practice guidance [here](#).

What is our role in the sequential test?

We can advise on the relative flood risk between the proposed site and any alternative sites identified - although your strategic FRA should allow you to do this

yourself in most cases. We won't advise on whether alternative sites are reasonably available or whether they would be suitable for the proposed development. We also won't advise on whether there are sustainable development objectives that mean steering the development to any alternative sites would be inappropriate. Further guidance on how to apply the sequential test to site specific applications can be found in the planning practice guidance [here](#).

Exception test

In accordance with the National Planning Policy Framework (paragraphs 178 and 179), the proposed development is appropriate provided that the site meets the requirements of the exception test. Our comments on the proposals relate to the part of the exception test that demonstrates the development is safe. The local planning authority must decide whether or not the proposal provides wider sustainability benefits to the community that outweigh flood risk.

Flood resistance and resilience

We strongly recommend the use of flood resistance and resilience measures. Physical barriers, raised electrical fittings, and special construction materials are just some of the ways you can help reduce flood damage.

To find out which measures will be effective for this development, please contact your building control department. If you'd like to find out more about reducing flood damage, visit the [Flood Risk and Coastal Change pages](#) of the planning practice guidance. Further guidance on flood resistance and resilience measures can also be found in:

Government guidance on flood resilient construction

<https://www.gov.uk/government/publications/flood-resilient-construction-of-new-buildings>

CIRIA Code of Practice for property flood resilience

https://www.ciria.org/CIRIA/Resources/Free_publications/CoP_for_PFR_resource.aspx

British Standard 85500 – Flood resistant and resilient construction

<https://shop.bsigroup.com/ProductDetail/?pid=000000000030299686>

Flood risk issues not within our direct remit

The following issues are not within our direct remit or expertise, but nevertheless are important considerations for managing flood risk for this development. Prior to deciding this application, we recommend that consideration is given to the issues below. Where necessary, the advice of relevant experts should be sought.

- Adequacy of rescue or evacuation arrangements
- Details and adequacy of an emergency plan
- Provision of and adequacy of a temporary refuge
- Details and adequacy of flood proofing and other building level resistance and

resilience measures

- Details/calculations relating to the structural stability of buildings during a flood
- Whether insurance can be gained or not
- Provision of an adequate means of surface water disposal such that flood risk on and off-site isn't increased

We can provide the following information on the characteristics of flooding at this site to help with your decision:

Flood warning and emergency response

Our involvement with this development during an emergency will be limited to delivering flood warnings to occupants/users covered by our flood warning network. We therefore do not normally comment on or approve the adequacy of flood emergency response procedures accompanying development proposals, as we do not carry out this type of role /responsibility during a flood.

Planning practice guidance (PPG) states that, in determining whether a development is safe, the ability of residents and users to safely access and exit a building during a design flood and to evacuate before an extreme flood needs to be considered. One of the key considerations to ensure that any new development is safe is whether adequate flood warnings would be available to people using the development.

In all circumstances where warning and emergency response is fundamental to managing flood risk, we advise LPAs to formally consider the emergency planning and rescue implications of new development in making their decisions. As such, we recommend you refer to '[Flood risk emergency plans for new development](#)' and undertake appropriate consultation with your emergency planners and the emergency services to determine whether the proposals are safe in accordance with paragraph 181 (inc. footnote 63) of the NPPF and the guiding principles of the PPG.

Biodiversity Net Gain

We are not a statutory consultee for Biodiversity Net Gain (BNG) however, we are providing advice on the watercourse metric for your consideration on those applications that met our internal risk bar and where we are able to add value. For this application, we have not reviewed the BNG information or any metric calculations for watercourses as part of our response. Our position on this application does not mean that the BNG proposals are appropriate as submitted, however, we can offer the following advice:

The Watercourse Unit Module within the Statutory Biodiversity Metric is of key importance in determining whether BNG has been met for watercourses. The Watercourse Unit Module is applied to priority rivers; other rivers and streams; canals; ditches and culverted sections of these features.

Please be aware, this application is subject to statutory BNG and requires completion of the Watercourse Unit Module by a competent person because the watercourse bank top is within 10m of the redline boundary (ie the red line boundary intersects the riparian zone).

Guidance on undertaking metric calculations is available in [The Statutory Biodiversity Metric User Guide \(Feb 2024\)](#) and all information regarding BNG can be found via <https://www.gov.uk/guidance/understanding-biodiversity-net-gain> or in the [planning practice guidance](#).

Further information, data and advice on our rivers and catchments can be found using the [England | Catchment Data Explorer](#) and [River Basin Management Plans](#).

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.

In accordance with the planning practice guidance (determining a planning application, paragraph 038), please notify us by email within two weeks of a decision being made or application withdrawn. Please provide us with a URL of the decision notice, or an electronic copy of the decision notice or outcome.

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

Yours sincerely,

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Planning Advisor

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