

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

Our ref: NE/2026/139010/01
Your ref: 26/00021/FP
Date: 6 February 2026

Dear Tom,

1 and 3 Priory Lane, Little Wymondley, Hitchin, Hertfordshire, SG4 7HE.

Erection of one pair of semi-detached dwellings and one detached dwelling to include cycle stores, hard and soft landscaping and parking following demolition of the existing commercial buildings. Alterations to existing vehicular access.

Thank you for consulting us on the above application on 20 January 2026. As part of the consultation, we have reviewed the following document:

- Flood Risk Assessment for 1 Priory Lane SG4 7HE, prepared by RIDA, dated March 2025 (ref: R0772 FRA-v1).

Environment Agency Position

Based on our review of the above documentation, **we object** to this planning application and recommend that planning permission is refused.

Reason

The Flood Risk Assessment (FRA) relies on flood modelling that has not yet been submitted to us for review. This modelling must be provided for review so that we can determine whether it is fit for purpose.

Until the modelling underpinning the FRA has been reviewed and confirmed as suitable for use, we are unable to comment on the adequacy of the FRA, the suitability of any proposed flood mitigation measures, or whether the development complies with national and local planning policy.

Overcoming our objection

The applicant would need to submit their flood risk modelling for review. As part of this the following information needs to be submitted:

1. All model files and the model itself.
2. Flood outlines for all return periods modelled.
3. Model Report; this should detail what they have done, explain any decisions taken, provide enough detail for us to be able to replicate every step taken. It is best practice to use the latest model software; if this has not been used then the model report should justify why a previous model version has been deemed appropriate for use.
4. Model log; to track any changes and updates.
5. Survey; if it is a new model / they have made changes to our model.
6. Details of sensitivity testing; such as changes to inflow, roughness, downstream boundary, structure coefficients, etc.
7. A clear file naming convention.

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 flood risk assessment 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 flood risk assessment 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.

Advice to applicant

Pre-Application Advice

We strongly encourage applicants to seek our pre-application advice to ensure environmental opportunities are maximised and to avoid any formal objections from us. If the applicant had come to us, we could have worked with them to resolve these issues prior to submitting their planning application. The applicant is welcome to seek our advice now to help them overcome our objection via HNL.SustainablePlaces@environment-agency.gov.uk.

Further information on our charged planning advice service is available at: [Planning and marine licence advice: standard terms for our charges - GOV.UK](#)

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.

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,

Charlotte Mann
Planning Advisor

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