

Thomas Howe
North Hertfordshire District Council -
Development Control
Council Offices
Gernon Road
Letchworth Garden City
SG6 3JF

Our reference: PA-0003200/01

Your reference: 26/00262/FP

15 May 2026

Erection of one detached dwelling.

**Land At New Pound Farm East Side Of Old Hale Way Hitchin Hitchin
Hertfordshire SG4 0SA**

Dear Thomas,

Thank you for consulting us on the above application, on 21 April 2026. As part of our consultation, we have reviewed the following documents:

- FLOOD RISK ASSESSMENT prepared by Stomar, reference ST3481/FRA-2404, Revision 1, dated April 2024

Environment Agency Position

Having reviewed the information provided, **we object** to this application due to the absence of an acceptable Flood Risk Assessment (FRA).

We recommend that planning permission is refused unless the flood risk matters detailed below can be adequately addressed.

This objection is supported by Paragraph 170 of the National Planning Policy Framework which states that 'Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere). This is further supported by Policy NE7: Reducing flood risk of the North Herts Local Plan.

Objection – Inadequate Flood Risk Assessment

Our Flood Map for Planning shows the site lies partly within Flood Zone 3, defined by the 'Planning Practice Guidance: Flood Risk and Coastal Change' as having a high

probability of flooding. The proposal is for one dwelling, which is classified as a 'more vulnerable' development, as defined in [Annex 3:Flood Vulnerability classification](#) of the National Planning Policy Framework. (insert NPPF/Local Plan policy)

The FRA states that the site lies within Flood Zone 1. However, the extract from our Flood Map for Planning included in the FRA (Figure 3.1) is out-of-date. Our latest Flood Map shows that the site lies partly within Flood Zone 3.

Reasons for Objection

The submitted FRA does not comply with the requirements for site-specific flood risk assessments, 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 flood risk assessment checklist. The FRA does not therefore adequately assess the flood risks posed by the development. In particular, the FRA fails to:

- Demonstrate that a sequential approach has been taken to the site layout.
- Include all the available and most up-to-date information on flood risk at the site.
- Include an assessment of the impact of climate change on flood risk using appropriate climate change allowances.
- Demonstrate that adequate flood storage compensation can be provided to ensure there will be no increase in flood risk elsewhere.
- Demonstrate that adequate flood risk mitigation measures will be included in the design of the proposed development to ensure the development will be safe for its lifetime.

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.

Modelled flood data is available from our River Ivel model and relevant flood levels should be compared with a topographic survey to define the flood zone extents at the site. A site layout plan showing the modelled flood zone extents should be included in a revised FRA. The proposed dwelling should be sited within Flood Zone 1.

Advice to Applicant

Floodplain compensation

It will need to be demonstrated that any increase in built footprint within the 1% annual probability flood extent (including an 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.

The use of voids and stilts as mitigation for a loss in floodplain storage should be avoided as experience shows that they become blocked over time by debris and the voids are often used for storage purposes. We would therefore recommend to the Local Planning Authority that these are not accepted as methods of compensation unless there is no other alternative.

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% annual probability flood level, including an appropriate allowance for climate change. We would also expect some cross-sectional drawings to be provided showing the volume lost and gained within each slice.

An assessment of the impact of climate change on flood risk at the site will need to be undertaken using appropriate climate change allowances. Further guidance on climate change allowances can be found at: [Flood risk assessments: climate change allowances - GOV.UK](#)

Finished floor levels

Finished floor levels should be set a minimum of 600mm above the 1% annual probability flood level, including an appropriate allowance for climate change. This is to protect people and the property from flooding both now and in the future

Further information

Further guidance on what information should be included in an FRA is available on our website: [Flood risk assessment: Flood Zones 1, 2, 3 and 3b - GOV.UK](#).

Relevant flood risk data that we have available can be ordered via our [Flood Map for Planning page](#). Alternatively, our Customers and Engagement teams can provide any relevant flood risk information that we have available. Please visit the following website to find out which products you will need and how to request these: www.environment-agency.gov.uk/research/planning/93498.aspx. If you have

any queries, please contact our Customer and Engagement team
at Enquiries_EastAnglia@environment-agency.gov.uk

An appropriate FRA is an essential requirement for making an informed decision. An FRA should sufficiently identify and assess the risks of all forms of flooding to and from the proposed development and should demonstrate how flood risks will be managed, taking climate change into account. This application should not be approved without a sufficient understanding of the risk.

Informative

Please include the below informative for any permission granted.

Environmental permit – Flood risk activities - advice to applicant

The Environmental Permitting (England and Wales) Regulations 2016 require a permit or exemption to be obtained for any of the following activities:

- erecting any temporary or permanent structure in, over or under a main river, such as a culvert, outfall, weir, dam, pipe crossing, erosion protection, scaffolding or bridge
- altering, repairing or maintaining any temporary or permanent structure in, over or under a main river, where the work could affect the flow of water in the river or affect any drainage work
- building or altering any permanent or temporary structure designed to contain or divert flood waters from a main river
- dredging, raising or removing any material from a main river, including when you are intending to improve flow in the river or use the materials removed
- diverting or impounding the flow of water or changing the level of water in a main river
- quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
- any activity within 8 metres of the bank of a main river, or 16 metres if it is a tidal main river
- any activity within 8 metres of any flood defence structure or culvert on a main river, or 16 metres on a tidal river
- any activity within 16 metres of a sea defence structure
- activities carried out on the floodplain of a main river, more than 8 metres from the river bank, culvert or flood defence structure (or 16 metres if it is a tidal main river), if you do not have planning permission (you do not need permission to build agricultural hay stacks, straw stacks or manure clamps in these places)

For further guidance please visit [Flood risk activities: environmental permits - GOV.UK](#) or contact our National Customer Contact Centre on 03708 506 506 (Monday to Friday, 8am to 6pm) or by emailing enquiries@environment-agency.gov.uk.

The applicant should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with us at the earliest opportunity.

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.

Other Sources of Flooding

In addition to the above flood risk, the site may be within an area at risk of flooding from surface water, reservoirs, sewer and/or groundwater. We have not considered these risks in any detail, but you should ensure these risks are all considered fully before determining the application

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.

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

If you have any questions regarding our response, please contact

creating a better place
for people and wildlife



hnlustainableplaces@environment-agency.gov.uk

Yours sincerely,

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