

Matter 6 – Proposed site allocations

Huntingdon Spatial Planning Area

Response on behalf of Bellway Homes and Henry H Bletsoe & Son LLP (Representor ID:1117482)

Flood risk

7) How is the site affected by flood risk? How has this been taken into account in allocating the site? Have the sequential and, if necessary, exception tests been applied?

Response

- 1.1.1 In paragraphs 7.1-7.4 (pages 12-13) of Huntingdonshire District Council's response to Matter 3, I note that in HDC's opinion the sequential test has been applied correctly and is in accordance with national policy and guidance. However, the sequential test has not been applied correctly for the reasons set out in our response to Matter 3. HDC's approach conflicts with the requirements of NPP101, NPPG019, NPPG021 (incl. Diagram 2) and NPPG022. Fundamentally, the justification for not meeting the FOAHN in Flood Zone 1 (also considering other forms of flooding) has not been set out, in clear conflict with the strict test in NPP101 (*"Development should not be allocated or permitted if there are reasonably available sites for the proposed development in areas with a lower probability of flooding"*).
- 1.1.2 The sequential test and supporting SA should have rigorously tested the opportunity to allocate land in Zone 1 and less affected by other forms of flooding. District-wide there are 9 sites, covering a total of 874ha of land, which pass the sequential test but have been failed for 'non-flooding' reasons without justification. This is the essential first stage and necessary to meet the strict test in NPP101. Bellway Homes' site at Dexter's Farm, Godmanchester, is one such sequentially preferable opportunity that needs to be properly tested as a reasonably available alternative (representations to the submitted plan clearly set out the potential of this landholding, including development principles document, landscape strategy and transport appraisal). There is no justification to why perceived landscape issues would override NPP101.
- 1.1.3 For the Huntingdon SPA, a number of draft allocations are significantly affected by flood risk, as listed in Table A, when sequentially preferable and 'reasonably available' alternative sites have been discounted for non-flooding reasons.

Table 1 Extent of flood risk on allocated sites in the Huntingdon SPA

Site	Extent of flood risk & comments
Huntingdon	
HU7 – Gas Depot, Mill Common (11 dwellings)	<ul style="list-style-type: none"> Sequential test shows that 44% of the site is in Flood Zones 2 & 3 (page 15) HEELA identifies flood risk as a constraint (page 100)
HU9 – Main Street (30 dwellings)	<ul style="list-style-type: none"> <u>100% of the site in Flood Zone 2</u> as shown in the sequential test (page 13) HELAA identifies flood risk as a constraint with a 'negative' score (page 149) In addition, significant surface water flood risk shown in the EA's mapping (Appendix 1 to my representations made on the submitted plan). The EA's response to Matter 3 also highlights the lack of consideration given to surface water flooding. The EA also highlighted surface water flood risk and the need for a sequential approach to site design in response to the 2017 consultation draft (Appendix 2 to my representations made on the submitted plan).
Brampton	
HU13 – Brampton Park (600 dwellings)	<ul style="list-style-type: none"> Sequential test shows <u>50% of the site in Flood Zones 2 & 3</u> (page 15) HELAA notes flood risk as a constraint with a 'negative' score (page 104)
HU14 – Brampton Park Golf Club Practice Ground (65 dwellings)	<ul style="list-style-type: none"> Sequential test shows 59% of the site in Flood Zone 2 (page 13) HELAA highlights flood risk as a constraint with a 'negative' score (page 193) and notes <u>need for sequential and exception tests</u>.
Godmanchester	
HU16 – Tyrell's Marina (15 dwellings)	<ul style="list-style-type: none"> Environment Agency objection to this allocation (Appendix 3) given that <u>77% of the site is functional flood plain</u>. HELAA also highlights flood risk as a constraint with a 'negative' score (page 108). Exception test undertaken, highlighting the benefit of regeneration (sequential test page 20).

David Fovargue, MRTPI (Technical Director, Wood plc)

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