

## **Matter 6: Sites HU16 Tyrells Boat Yard**

The National Planning Policy Framework makes no provision for more or less vulnerable development (such as that proposed) in functional floodplain, flood zone 3b.

We therefore support Huntingdonshire's specification that there should not be any vulnerable development in functional floodplain, and that the number of dwellings is not specified.

However, there may be some flexibility on how functional floodplain is distributed within the site. The SFRA did not take the opportunity to explore evidence or options to refine the definition of functional floodplain in this location. However there may be scope to reconfigure the functional floodplain in this area either by re-profiling to provide [move] the flood storage towards the rear of the site or compensating for any land raising with volume for volume, level for level compensation off site in the close vicinity.

Floodplain compensation off-site may not be possible given third party land ownership, although with some land is believed to be in public ownership/control, and may have scope exploration. The Environment Agency is not aware that this has been explored to date.

Given the regularity with which the site floods, we do not believe that creating voids below buildings would be a sustainable way to deal with flood water. Silt and debris would need regular removal, in confined spaces requiring specialist [safety approved] contractors.

The draft revised NPPF makes reference to LPAs taking account of current and future flood risk in decision making. If this policy remains in the final adopted version, the functional floodplain may be larger still on this site, and should be carefully considered when it is published.