

# Matter 7 – Proposed site allocations

## St Neots Spatial Planning Area

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

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### 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 St Neots 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 St Neots SPA

Site	Extent of flood risk & comments
<b>Strategic Expansion Location</b>	
SEL2 – St Neots East (3,820 dwellings)	<ul style="list-style-type: none"> <li>• Environment Agency highlight multiple water courses and need for downstream betterment, plus impacts on development viability (Appendix 4 to representations made to the submitted plan).</li> <li>• HELAA identifies the risks of flooding associated with the site (page 285).</li> <li>• 12% in Flood Zones 2 &amp; 3 (sequential test, page 12).</li> <li>• Also note negative landscape impacts (HELAA, pages 284 &amp; 285)</li> </ul>
<b>St Neots</b>	
SN 1 - St Marys Urban Village, St Neots (40 dwellings)	<ul style="list-style-type: none"> <li>• Sequential test shows 88% in Flood Zone 2 and 13% in Flood Zones 3a &amp; 3b and highlights various flood risk constraints (page 15).</li> <li>• Flood risk also identified as a constraint on page 255 of the HELAA with a 'negative' score.</li> </ul>
SN 2 - Loves Farm Reserve Site (40 dwellings)	<ul style="list-style-type: none"> <li>• 36% in Flood Zone 2, with rest Flood Zone 3 (page 19 of the sequential test)</li> <li>• Fails exception test as set out in the sequential test, concluding that the site will not deliver wider sustainability benefits (page 6)</li> <li>• HELAA page 262 also highlights flood risk constraints</li> </ul>
SN 3 - Cromwell Road, St Neots (80 dwellings)	<ul style="list-style-type: none"> <li>• Environment Agency objection lodged to previous Local Plan consultation (Appendix 5 to submitted representations) regarding the risks associated with a culverted water course. Further concerns raised in response to the submitted plan (EA, 5<sup>th</sup> February 2018).</li> <li>• 36% of site in Flood Zones 2 &amp; 3 as reported in the sequential test (page 17).</li> </ul>
SN 5 - Former Youth Centre, Priors Road, St Neots (14 dwellings)	<ul style="list-style-type: none"> <li>• 93% of the site in Flood Zone 3a as reported in sequential test (page 19).</li> <li>• Flood risk constraints identified in the HELAA with a 'negative' score (page 252).</li> <li>• Exception test undertaken, concluding that the site is previously developed and could enhance the character and appearance of the conservation area</li> </ul>

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