

Matter 3: Development strategy: Flood risk and Infrastructure

Inspector's Questions:

Flood risk

17) How has flood risk been taken into account in arriving at the strategy and distribution of growth?

17.1 In 2016 Huntingdonshire carried out a SFRA update. This was following advice from the Environment Agency that the 2011 SFRA was largely obsolete in respect of baseline flood modelling and new climate change allowances. Huntingdonshire also needed a consistent study of prospective site allocations.

18) What was the approach to the sequential and exception tests when considering the distribution of growth and site allocations? Has the sequential test been applied correctly?

18.1 Given that allocations in Huntingdonshire exceed minimum projected requirements, the sequential approach can be applied with substantial weight in Huntingdonshire.

18.2 The justification for development in flood risk areas is limited to regeneration sites, sites with extant permissions and allocations that fulfil local objectives that HDC consider cannot be achieved in flood zone 1.

Is the approach justified and consistent with national policy?

18.3 We consider that the above approach is consistent in respect of fluvial flooding, noting that the Environment Agency does not have a remit to comment on the extent to which sites fulfil local objective and regeneration needs.

What concerns have been raised and what is the Council's response to these?

18.4 In the Environment Agency's capacity of applying a 'strategic overview' (Flood and Water Management Act 2010), the Environment Agency observed that several sites at risk of surface water flooding were allocated and we were unaware of what SFRA information was used to inform these.

18.5 The Lead Local Flood Authority is the lead advisor on sites at risk of surface water flooding and is best placed to advise on the current status of these sites.

19) Is Policy LP5 justified, effective and consistent with national policy?

19.1 We support the general thrust of LP 5 and most of the specific policies within it. We support the plan's links to the Cambridgeshire Flood and Water SPD, and

confirmation that reliance on emergency services to make development safe will not be acceptable.

19.2 We would not wish to see LP5 weakened in a local authority with substantial urban areas and inhabited rural areas at risk of flooding. This is coupled with vulnerability to climate change impacts of flooding. The scale of growth planned is so substantial, the policies in the plan will have significant impacts into the future.

Flood risk and betterment

19.3 Applying national policy, from a flood risk point of view, we do not consider that the plan is sound in terms of its policy approach to using opportunities offered by allocated development to reduce the causes and impacts of flooding. We refer to the Framework 100 for policy LP5 and the site specific policies). In avoiding flood increases elsewhere NPPF paragraph 103 applies to 5.39.

19.4 We advise that further modifications are required to make the plan compliant with national policy, and thus to be considered sound.

Mitigating and adapting to climate change

19.5 Policy 100 of the Framework states that local plans should use the opportunities offered by new development to reduce the causes and impacts of climate change, and that LPAs should adopt pro-active strategies to reduce the cause and effects of climate change. (Paragraph 94). This requirement is further elaborated in the NPPG, which states that Local Authorities should seek opportunities to reduce the overall level of flood risk in the area and beyond.

19.6 Policy LP5 (d) includes a welcome reference to taking ‘all reasonable opportunities to reduce overall flood risk...’ However, there is no policy consideration of how and where/when this will be achieved. In our view this is unlikely to ensure flood risk reduction and climate change mitigation through the substantial new development proposed in Huntingdonshire.

19.7 None of the site specific policies cite opportunities to reduce flood risk. These have been identified individually within Appendix 1 of the Environment Agency’s response to the Proposed Submission Draft (PSD).

19.8 We advocate that modifications that should be made to the plan to address this gap. Cambridgeshire County Council, as Lead Local Flood Authority has identified modifications in their consultation response. We endorse these comments, and recommend they are included to ensure the plan is compliant with national policy. Comments on specific sites are also included in our response on specific sites (Appendix 1). These changes would, in our view satisfy national policy, specifically NPPF paragraph 100.

Avoiding flood risk increases elsewhere

19.9 Local Planning Authorities are required by paragraph 103 of the Framework to ensure that flood risk is not increased elsewhere.

19.10 In this context, we would question whether paragraph 5.39 is contrary to national policy. This paragraph would appear to allow unregulated/unrestricted flow into the Middle Level Commissioners' system, based on the text '*in some circumstances, an unregulated flow into the MLC's managed system may be the most appropriate long term solution.*'

19.11 The DEFRA SuDS standards identify surface water bodies that can accommodate uncontrolled surface water discharges without any impact on flood risk, giving examples of the sea, and large estuaries. In our view the managed MLC network is not comparable to the sea or large estuaries. Uncontrolled surface water discharge is likely to impact on flood risk at source as well as downstream where the MLC system discharges to the River Great Ouse.

19.12 The Huntingdonshire Level 1 and 2 SFRA (section 6.4.4) identified that there are no detailed models for the IDB networks and the standard of protection they provide is based solely on their policy statements. We have not seen evidence to support this assertion, and would welcome it. Until such evidence appears we advise that adding uncontrolled flows into these system would have an unknown impact of their capacity and therefore have the potential to increase flood risk.

19.13 This paragraph is therefore contrary to the Framework as it is likely to result in flood risk increases. In order to comply with national policy, 5.39 could be amended as below:

The standing advice of the Middle Level Commissioners (MLC) or the appropriate internal drainage board has been taken into account when designing drainage for new development. ~~In some circumstances, an unregulated flow into the MLC's managed system may be the most appropriate long term solution. For such an approach to be acceptable prior agreement with the MLC will be required.~~

Access and Egress

19.14 We welcome specific requirements on the access and egress that were missing in the previous versions of the plan. However, a small but vital tweak is needed for soundness as the requirement that "development should be 'safe for all' for a 1:1000 annual probability flood event, for the lifetime of the development" is unjustified given the evidence available within the Strategic Flood Risk Assessment (SFRA).

19.15 The reference to '1:1000' may be a typo for an intended '1:100'. The SFRA does not map the 1:1000 flood extent, with an allowance for climate change and provides no justification or for such a precautionary measure. We would recommend that the requirement is reduced so that the FRA demonstrates that the "development

should be 'safe for all' for a 1:100 annual probability flood event, for the lifetime of the development, with appropriate climate change allowances.

19.16 The Environment Agency made further advisory comment to improve the clarity of the plan, and these are available in our response to the PSD consultation.

Infrastructure

*21) What are the implications for waste water infrastructure and capacity?
What improvements are needed and how will these be put in place and funded?
Is Policy LP6 justified, effective and consistent with national policy?*

We advise our view that LP6 is justified through the Water Cycle Study and specific references in site allocations.