

Matter 9 – Proposed site allocations

Ramsey 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 Ramsey SPA, one draft allocation is 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. This specific site does not pass the exception test.

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

Site	Extent of flood risk & comments
Ramsey	
RA 1 - Ramsey Gateway (High Lode) (110 dwellings)	<ul style="list-style-type: none"> • Environment Agency objection regarding the suitability of this allocation given flood risks (see Appendix 7). • 82% of the site in Flood Zone 3a (sequential test page 19). • Flood risk constraints identified in the HELAA (page 417). • An exception test has been carried out but concludes <i>"further information is required"</i> (page 6 of the sequential test).

David Fovargue, MRTPI (Technical Director, Wood plc)

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