

Matter 10 – Proposed site allocations

Key Service Centres

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 Key Service Centres, 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 Key Service Centres

Site	Extent of flood risk & comments
FS 3 - Cambridge Road East, Fenstanton (35 dwellings)	<ul style="list-style-type: none"> Environment Agency highlight issues with surface water flood risk and need for a sequential test to justify the site's allocation (see Appendix 8). Sequential test identifies that the site is Flood Zone 1 (page 9), but does not consider surface water flood risk (i.e. <u>all sources of flood risk</u> required by NPPF) (Appendix 9 to representations to the submitted plan for surface water flood risk map). Negative landscape impacts also identified in the HELAA (pages 490-491).
KB 1 - West of Station Road, Kimbolton (20 dwellings)	<ul style="list-style-type: none"> Environment Agency highlight concerns regarding surface water flood risk (the site being an overland flow route) plus need for a sequential test (Appendix 10 to representations made to the submitted plan). Surface water flood risk should have been considered as part of the sequential test to assess <u>all sources</u>. Negative landscape and heritage impacts identified in the HELAA (pages 535-536).
SY 1 - East of Glebe Farm, Sawtry (80 dwellings)	<ul style="list-style-type: none"> Environment Agency highlight a history of flooding associated with this site associated with surface water flood risk (Appendix 11 to representations made to the submitted plan). Surface water flood risk should have been considered as part of the sequential test to assess <u>all sources</u>. The EA also highlight this in their written response to Matter 3. In the EA's response to the submitted plan (Feb 2018) they also comment on the site's potential to impact on flood risk in Sawtry.
SY 2 - South of Gidding Road, Sawtry (295 dwellings)	<ul style="list-style-type: none"> Significant surface water flood risk on northern part of site (see plan in Appendix 12 to representations made to the submitted plan). Surface water flood risk should have been considered as part of the sequential test to assess <u>all sources</u>. Environment Agency highlight the risks associated with surface water flooding and need for a sequential test to justify the allocation of the site (Appendix 13 to representations made to the submitted plan).
SM 4 - Somersham Town Football Ground (45 dwellings)	<ul style="list-style-type: none"> Environment Agency objection based on surface water flood risk and possible fluvial risks associated with the water course (Appendix 14 to representations made to the submitted plan). Surface water flood risk should have been considered as part of the sequential test to assess <u>all sources</u> (see also the EA's written response to Matter 3). Negative landscape and heritage impacts identified in the HELAA (page 591-592).

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