

# Huntingdonshire Local Plan to 2036: Sequential test for flood risk

Huntingdonshire Local Plan | Huntingdonshire Local Plan to 2036: Sequential test for flood risk

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## 1 Introduction

- 1.1 This report documents the sequential and exception tests for flood risk that have been undertaken to inform site allocations in the Huntingdonshire Local Plan to 2036 Consultation Draft 2017.

# 2 National Policy requirements

## 2 National Policy requirements

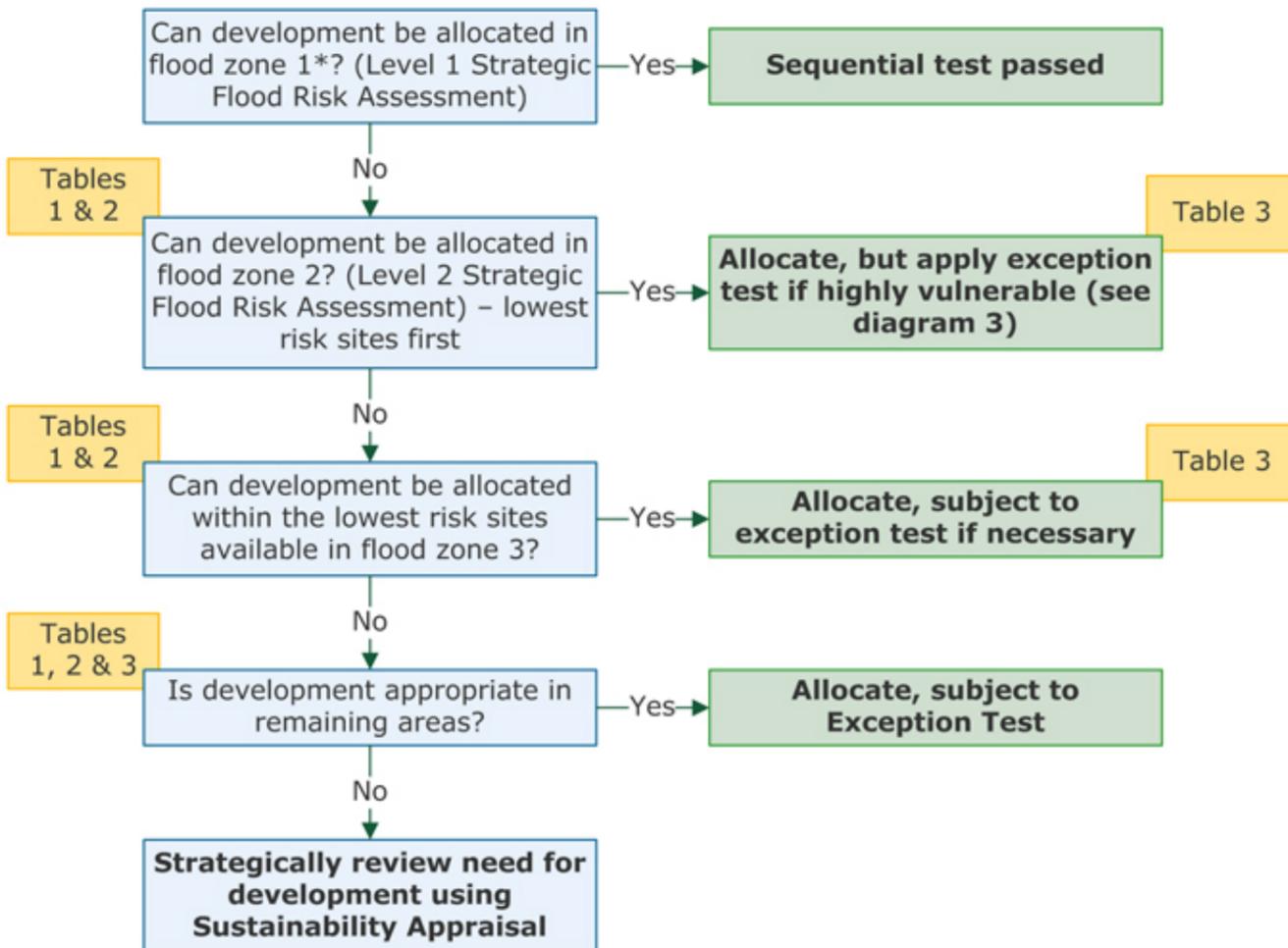
2.1 National Planning Practice Guidance (PPG) sets out requirements for the sequential and exception tests for flood risk as follows:

### What is the aim of the Sequential Test for the location of development?

The aim is to steer new development to Flood Zone 1 (areas with a low probability of river or sea flooding). Where there are no reasonably available sites in Flood Zone 1, local planning authorities in their decision making should take into account the flood risk vulnerability of land uses and consider reasonably available sites in Flood Zone 2 (areas with a medium probability of river or sea flooding), applying the Exception Test if required. Only where there are no reasonably available sites in Flood Zones 1 or 2 should the suitability of sites in Flood Zone 3 (areas with a high probability of river or sea flooding) be considered, taking into account the flood risk vulnerability of land uses and applying the Exception Test if required.

Paragraph: 019 Reference ID: 7-019-20140306

### PPG Sequential Test process



## The Exception Test

### What is the Exception Test?

The Exception Test, as set out in paragraph 102 of the Framework, is a method to demonstrate and help ensure that flood risk to people and property will be managed satisfactorily, while allowing necessary development to go ahead in situations where suitable sites at lower risk of flooding are not available.

Essentially, the 2 parts to the Test require proposed development to show that it will provide wider sustainability benefits to the community that outweigh flood risk, and that it will be safe for its lifetime, without increasing flood risk elsewhere and where possible reduce flood risk overall.

Paragraph: 023 Reference ID: 7-023-20140306

### How can wider sustainability benefits that outweigh flood risk be demonstrated?

Evidence of wider sustainability benefits to the community should be provided, for instance, through the sustainability appraisal. If a potential site allocation fails to score positively against the aims and objectives of the sustainability appraisal, or is not otherwise capable of demonstrating sustainability benefits, the local planning authority should consider whether the use of planning conditions and/or planning obligations could make it do so. Where this is not possible the Exception Test has not been satisfied and the allocation should not be made.

Paragraph: 024 Reference ID: 7-024-20140306

### What needs to be considered so that development will be safe for its lifetime?

Wider safety issues need to be considered as part of the plan preparation. If infrastructure fails then people may not be able to stay in their homes. Flood warnings and evacuation issues therefore need to be considered in design and layout of planned developments. In considering an allocation in a Local Plan a level 2 Strategic Flood Risk Assessment should inform consideration of the second part of the Exception Test. See further information on making development safe from flood risk and on what is considered to be the lifetime of development.

Paragraph: 025 Reference ID: 7-025-20140306

### 3 Application of Sequential Test

#### Evidence base

3.1 The application of the sequential and exception test for Local Plan sites is informed by the Huntingdonshire Strategic Flood Risk Assessment Level 1 and 2 (June 2017), including level 2 detailed site assessments for those sites that were considered potential local plan allocations at that time.

#### Broad approach

3.2 The approach taken to applying the sequential test to individual sites and the overall package of sites in Huntingdonshire is set out in the diagram below. This approach applies the principles set out in the PPG in the following way:

- The PPG sets out the broad approach to applying the sequential test of steering new development to Flood Zone 1. However, the question of whether sites can be allocated within flood zone 1 is complicated by the fact that a single site will often not lie wholly within a single flood zone. The response to dealing with this issue in Huntingdonshire acknowledges that where more than 75% of a site lies within flood zone 1, then the proposed development can probably be sequentially accommodated within that 75%, and the site therefore can meet the sequential test.
- The sequential test is completed by development type.
- The PPG sequential test diagram above infers that the sequential test should only be undertaken until objectively assessed needs are met by the package of sites lying within the lowest flood risk areas. However, the sequential test assessment below considers additional sites over and above those that contribute to meeting the housing requirement, to provide flexibility of supply, and where there are specific regeneration opportunities.
- For the purposes of being comprehensive, the sites assessed include those discounted for non-flooding reasons. This is highlighted where relevant in the column named ‘non-flooding factor’.
- A number of sites that have previously been draft allocations in the Local Plan have now commenced or even completed development, and have been removed from the Local Plan, and are hence not included in this sequential test. Sites which have commenced development sized over 200 dwellings, and which are therefore comprised of development parcels which may not all have full planning permissions are being retained as allocations, and are included in this assessment.

#### Vulnerability of proposed development

3.3 The flood risk vulnerability of different types of development affects which Flood Zone development may be appropriate in. Using the vulnerability classification shown in [Planning Practice Guidance Table 3](#) referred to in the diagram above, the flood risk vulnerability of the sites tested in the SFRA are shown below.

3.4 The sites considered for allocation within the Local Plan are as follows:

Type of development	Number of sites tested	Vulnerability classification
Mixed (including residential)	15	More vulnerable
Residential	49	More vulnerable
Employment	12	Less vulnerable
Retail	1	Less vulnerable
Leisure	1	Less vulnerable
Amenity open space, nature conservation and biodiversity, outdoor sports and recreation and essential facilities such as changing rooms.	1	Water compatible development

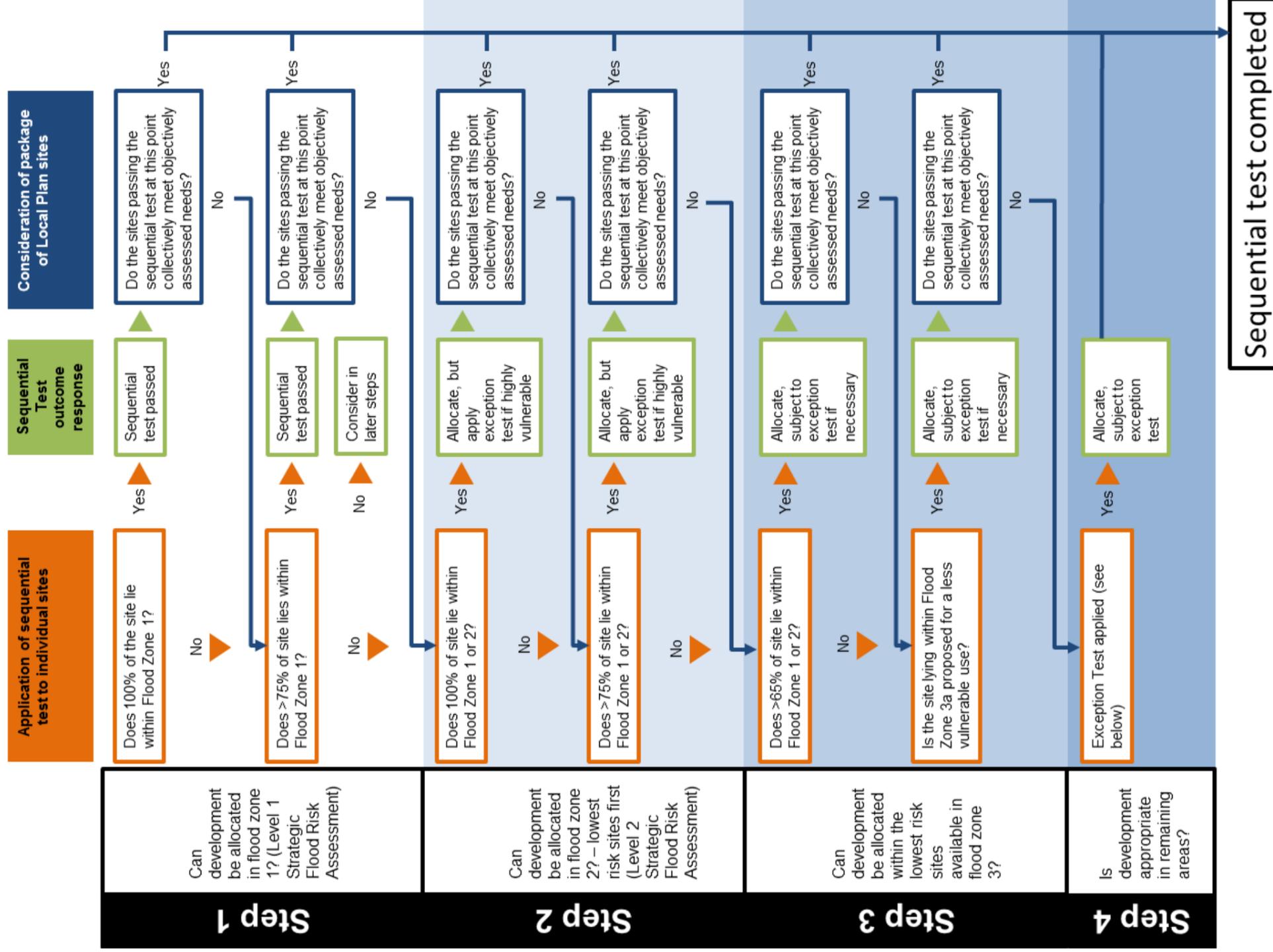
3.5 Based upon the above table:

- No sites are classified as highly vulnerable, so, following the PPG sequential test flow chart, the exception test is not required for any site that can be allocated in flood zone 2.
- The site proposed for leisure: Huntingdon Race Course has not been subjected to the sequential test. Most of the site is within the functional floodplain. However, since development is proposed within an existing site for activities that could not reasonably be located anywhere else than at the existing racecourse, it is not considered that there are reasonable alternatives to development at this location. Any proposals will need to be supported by a site specific flood risk assessment appropriate to the risk category of the uses proposed.
- The site proposed for amenity open space: the extension to Hinchingsbrooke Country Park, is classed as water compatible, so despite being located within an area of flood risk the sequential and exception test is not required. This site is therefore not considered further within this document.

# 3 Application of Sequential Test

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## Application of sequential test in Huntingdonshire



## 4 Application of the Exception Test

4.1 Following the application of the sequential test, the exception test is undertaken for those sites that require it. The two parts of the exception test are completed using the following evidence sources:

Question	Information source
Will the site provide wider sustainability benefits to the community that outweigh flood risk? (The weighing up sustainability benefits excludes flood risk at this point, since this is already accounted for in the sequential test element, and in the second part of the exception test).	Sustainability Appraisal (SA) Summary in the Housing & Economic Land Availability Assessment
Will the site be safe for its lifetime, without increasing flood risk elsewhere and where possible reduce flood risk overall?	SFRA level 2 detailed site assessment Site specific flood risk assessment if available

4.2 Based upon a qualitative balancing of the evidence, a conclusion is drawn for each question as to whether the evidence shows that the site passes that part of the exception test. A site must pass both parts of the exception test to be considered suitable for allocation.

# 5 Summary of findings

## 5 Summary of findings

5.1 Based upon the flood risk findings set out in appendices 1 and 2, the allocations within the Local Plan are spread across areas of flood risk as follows:

### Sequential test for housing and mixed use sites (which include housing)

#### Sequential test for housing and mixed use sites (which include housing)

Housing requirement (A)	20,100
Completions and commitments (B)	4,409
Allocations wholly within flood zone 1 (C1.0)	6,639
Allocations with 75% of the site within flood zone 1 (C1.1)	9,378
100% of site lies within Flood Zone 1 or 2 (C2.0)	95
>75% of site lies within Flood Zone 1 or 2 (C2.1)	651
>65% of site lies within Flood Zone 1 or 2 (C3.0)	170
Less vulnerable sites lying within Flood Zone 3a (C3.1)	0
Total (D)	21,342
Additional allocations required to meet objectively assessed needs (A) – (D)	-1,242
Do the sites passing the sequential test at this point collectively meet objectively assessed needs?	<b>Yes</b>

### Exception test for housing and mixed use sites

Site name	Will the site provide wider sustainability benefits to the community that outweigh flood risk?	Will the site be safe for its lifetime, without increasing flood risk elsewhere and where possible reduce flood risk overall?	Is the site suitable for allocation?
'Tyrell's Marina, Godmanchester'	Yes	Yes	Yes
'West of London Road, St Ives'	No	Yes	No
'West of Cullum Farm, Hemingford Grey'	No	No	No
'Newtown Road, Ramsey'	Yes	No	No
'Former Youth Centre, Priory Road, St Neots'	Yes	Yes	Yes
'Loves Farm Reserved Site, St Neots'	No	Yes	N/A
'Former car showroom, London Road, St Ives'	Yes	Yes	Yes
'Vindis Car Show Room, St Ives'	No	Yes	No
'Ramsey Gateway (High Lode)'	Yes	Further information required	N/A

## Sequential test for Employment sites

### Background

5.2 The Employment Land Study 2014 findings suggest that there is limited quantitative demand for additional employment land between 2011 and 2036 beyond that proposed at Alconbury Enterprise Zone. This site, which lies within Alconbury Weald mixed use development, has potential to provide approximately 290,000m<sup>2</sup> of business floorspace (Alconbury Weald is tested for flood risk within the mixed development category since the proposed main uses is housing). However, the Employment Land Study recommends employment development in addition to the delivery of Alconbury Enterprise Campus on a qualitative basis to promote a sustainable pattern of employment growth around the district.

5.3 Sites including employment which are included in the sequential testing as mixed development since they contain housing, include:

Site location	'B' uses total (m <sup>2</sup> )
Alconbury Weald	290,000
St Neots Eastern Expansion	77,000
Bearscroft Farm, Godmanchester	15,400
Former RAF Upwood	7,000
Former Dairy Crest, Fenstanton	660
<b>Total</b>	<b>390,060</b>

### Findings

5.4 The employment sites tested for flood risk pass the sequential test as follows:

Allocations wholly within flood zone 1 (C1.0)	7.41ha
Allocations with 75% of the site within flood zone 1 (C1.1)	5.57ha
<b>Total (D)</b>	<b>12.98ha</b>

## Sequential test for retail sites

### Background

5.5 The Huntingdonshire Retail and Commercial Leisure Needs Assessment 2017 identifies some retail capacity in Huntingdonshire's market towns and Strategic Expansion Locations between 2011 and 2036. A significant amount of retail development is under construction in Huntingdon town centre at Chequers Court (previously a draft allocation). In addition to Chequers Court, a number of sites which include retail, including the Strategic Expansion Locations, are included in the sequential testing as mixed development since they contain housing. These include:

Site location	'A' uses total (m <sup>2</sup> )
Alconbury Weald	7,000
St Neots Eastern Expansion	5,400
Ermine St, Huntingdon	1,000
George St, Huntingdon	1,000
Brampton Camp	560
Tyrells Marina, Godmanchester	53
Bearscroft Farm, Godmanchester	950
St Ives West	450
<b>Total</b>	<b>16,413</b>

5.6 It is therefore considered that there is no further need to allocate additional land for retail.

### Findings

5.7 Other than mixed development sites which include retail, which are included in the sequential test as mixed and residential uses, only one potential retail site was tested for the sequential test: Huntingdon Fire Station. Given its location in an area of flood risk and the lack of quantitative capacity for additional retail in Huntingdon, this site did not pass the sequential test.

## Appendix 1: Sequential Test for housing and mixed sites (which include housing)

### Site reference key

Site Reference	Source
Eg CfS2017:012	Consulted upon in the Housing & Economic Land Availability Assessment: October 2017
Eg RA6	Last consulted upon in the Local Plan Consultation Draft 2017 - individual site reference
T/C-HU2	Last consulted upon in the Local Plan Targeted Consultation 2015 - individual site reference
HELAA 2016	Last consulted upon in the Housing & Economic Land Availability Assessment Additional Sites Consultation 2016
ECS+13	Last consulted upon in the Huntingdonshire Environmental Capacity Study: Additional Site Assessments, in 2013
ST3 ECS 13	Last consulted upon in the Stage 3 Huntingdonshire Environmental Capacity Study Consultation

## Step 1: Can development be allocated in flood zone 1?

### 100% of site lies within Flood Zone 1

Site ref	SPA	Site name	Area (ha)	Type of development	FZ3b	FZ3a	FZ2	FZ1	Non-flooding factor	Add into housing figures?	Dwellings to 2036
RA6	Ramsey	94 Great Whyte, Ramsey	0.71	Residential	0%	0%	0%	100%	0	Yes	33
YX1	Yaxley	Askew's Lane, Yaxley	0.5	Residential	0%	0%	0%	100%	0	Yes	9
HU19	Huntingdon	Bearscroft Farm, Godmanchester	45.5	Mixed	0%	0%	0%	100%	Large site started but retained as an allocation	Yes	753
HELAA 2016	Ramsey	Biggin Lane	9.04	Residential	0%	0%	0%	100%	0	Yes	0
CfS2017:094	Huntingdon	California Road, Huntingdon	1.35	Residential	0%	0%	0%	100%	0	Yes	54
FS2/ FS3	Fenstanton	Cambridge Road, Fenstanton	6.9	Residential	0%	0%	0%	100%	0	Yes	120
CfS2017:196	Huntingdon	Corpus Christi Lane, Godmanchester	0.69	Residential	0%	0%	0%	100%	Discounted for non-flooding reason	No	0
SN4	St Neots	Cromwell Road Car Park, St Neots	0.58	Residential	0%	0%	0%	100%	0	Yes	21
SY1	Sawtry	East of Glebe Farm, Sawtry	3.87	Residential	0%	0%	0%	100%	0	Yes	60
HU1	Huntingdon	Ermine Street, Huntingdon	85	Mixed	0%	0%	0%	100%	0	Yes	1450
WB4	Warboys	Fenton Field Farm, Warboys	1.1	Residential	0%	0%	0%	100%	Discounted for non-flooding reason	No	0
RA4	Ramsey	Field Road, Ramsey	5.2	Residential	0%	0%	0%	100%	0	Yes	90
FS1	Fenstanton	Former Dairy Crest Factory, Fenstanton	3.2	Residential	0%	0%	0%	100%	0	Yes	88
T/C-HU2	Huntingdon	Former Forensic Science Laboratory, Huntingdon	2.71	Residential	0%	0%	0%	100%	0	Yes	105
HU6	Huntingdon	George Street, Huntingdon	3.0	Residential	0%	0%	0%	100%	0	Yes	300
HU2	Huntingdon	Hinchingbrooke Health Campus, Huntingdon	22.6	Mixed	0%	0%	0%	100%	Discounted for non-flooding reason	No	0
WB2	Warboys	Manor Farm Buildings, Warboys	0.61	Residential	0%	0%	0%	100%	0	Yes	10
SM1	Somersham	Newlands, St Ives Rd, Somersham	2.48	Residential	0%	0%	0%	100%	0	Yes	45
SM4	Somersham	North of the Bank, Somersham	2.14	Residential	0%	0%	0%	100%	0	Yes	55
SEL1.2	Huntingdon	RAF Alconbury	84.1	Mixed	0%	0%	0%	100%	0	Yes	1480
RA7	Ramsey	RAF Upwood and Upwood Hill House, Ramsey	25	Residential	0%	0%	0%	100%	0	Yes	450

# Appendix 1: Sequential Test for housing and mixed sites (which include housing)

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Site ref	SPA	Site name	Area (ha)	Type of development	FZ3b	FZ3a	FZ2	FZ1	Non-flooding factor	Add into housing figures?	Dwellings to 2036
CfS2017:150	Huntingdon	Sapley Park Farm	73	Mixed	0%	0%	0%	100%	Discounted for non-flooding reason	No	0
SM3	Somersham	Somersham Town Football Ground	1.8	Residential	0%	0%	0%	100%	0	Yes	47
WB3	Warboys	South of Farrier's Way, Warboys	3.63	Residential	0%	0%	0%	100%	0	Yes	74
SI2	St Ives	St Ives football Club	1.4	Residential	0%	0%	0%	100%	0	Yes	30
SM2	Somersham	The Pasture, Somersham	0.9	Residential	0%	0%	0%	100%	0	Yes	20
HU12	Huntingdon	Dorling Way, Brampton	12.25	Residential	0%	0%	0%	100%	0	Yes	150
WB1	Warboys	West of Ramsey Road, Warboys	1.7	Residential	0%	0%	0%	100%	0	Yes	45
SY2	Sawtry	West of St Andrews Way, Sawtry	2.4	Residential	0%	0%	0%	100%	0	Yes	43
KB1	Kimbolton	West of Station Road, Kimbolton	1.3	Residential	0%	0%	0%	100%	0	Yes	20
RA3	Ramsey	West Station Yard and Northern Mill	1	Residential	0%	0%	0%	100%	0	Yes	34
RA5	Ramsey	Whytefield Road, Ramsey	0.9	Residential	0%	0%	0%	100%	0	Yes	40
HU18	Huntingdon	Wigmore Farm Buildings, Godmanchester	0.7	Residential	0%	0%	0%	100%	0	Yes	13
T/C-SEL3	Wyton on the Hill	Wyton on the Hill	254.06	Mixed	0%	0%	0%	100%	Discounted for non-flooding reason	No	0
CfS2017:141	Huntingdon	Lodge Farm, Huntingdon	307	Mixed	0%	0%	0%	100%	Discounted for non-flooding reason	No	0
CfS2017:157	Huntingdon	Former Police HQ site (part), Hinchingsbrooke Park Road, Huntingdon	5.8	Mixed	0%	0%	0%	100%	0	Yes	75
CfS2017:209	Huntingdon	Northeast of Alconbury Airfield	130	Mixed	0%	0%	0%	100%	Discounted for non-flooding reason	No	0
CfS2017:123	Huntingdon	East of Romans' Edge, Godmanchester (amended boundary)	73	Mixed	0%	0%	0%	100%	Discounted for non-flooding reason	No	0
CfS2017:188	Huntingdon	Dexters Farm, Godmanchester	12.9	Mixed	0%	0%	0%	100%	Discounted for non-flooding reason	No	0
CfS2017:185	Ramsey	East of Valiant Square, Bury	3.56	Residential	0%	0%	0%	100%	0	Yes	90
CfS2017:220	St Neots	North of St James Road, Little Paxton	1.3	Residential	0%	0%	0%	100%	0	Yes	34
CfS2017:226	Buckden	East of Silver Street and South of A1, Buckden	14.8	Residential	0%	0%	0%	100%	0	Yes	270
CfS2017:070	Kimbolton	North of Station Road/Stowe Road, Kimbolton	2.5	Residential	0%	0%	0%	100%	0	Yes	66
CfS2017:001	Somersham	East of Robert Avenue, Somersham	1.8	Residential	0%	0%	0%	100%	0	Yes	50

# Sequential Test for housing and mixed sites (which include housing) Appendix 1:

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Site ref	SPA	Site name	Area (ha)	Type of development	FZ3b	FZ3a	FZ2	FZ1	Non-flooding factor	Add into housing figures?	Dwellings to 2036
CfS2017:171	Somersham	College Farm, West of Newlands industrial estate, Somersham	1.8	Residential	0%	0%	0%	100%	0	Yes	57
CfS2017:035	Warboys	South of Stirling Close, Warboys	1.9	Residential	0%	0%	0%	100%	0	Yes	50
CfS2017:059	Alconbury	North of School Lane, Alconbury	6.3	Residential	0%	0%	0%	100%	0	Yes	95
CfS2017:015	Bluntisham	North of 10 Station Road, Bluntisham	1.1	Residential	0%	0%	0%	100%	0	Yes	29
CfS2017:157	Bluntisham	West of Longacres, Bluntisham	7.8	Residential	0%	0%	0%	100%	0	Yes	150
CfS2017:	Great Staughton	Between 20 Cage Lane and Averyhill, Great Staughton	0.4	Residential	0%	0%	0%	100%	0	Yes	14
CfS2017:	Great Staughton	South of 29 The Green, Great Staughton	0.7	Residential	0%	0%	0%	100%	0	Yes	20

## Do the sites passing the sequential test collectively meet objectively assessed needs?

Housing requirement (A)	20,100
Completions and commitments (B)	4,409
Allocations wholly within flood zone 1 (C)	6,639
<b>Total (D)</b>	<b>11,048</b>
Additional allocations required to meet objectively assessed needs (A) – (D)	9,052
Do the sites passing the sequential test at this point collectively meet objectively assessed needs?	<b>No</b>

# Appendix 1: Sequential Test for housing and mixed sites (which include housing)

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## >75% of site lies within Flood Zone 1

Site ref	SPA	Site name	Area (ha)	Type of development	FZ3b	FZ3a	FZ2	FZ1	Non-flooding factor	Comment	Add into housing figures?	Dwellings to 2036
SEL1.1	Huntingdon	Former Alconbury Airfield and Grange Farm	575	Mixed	1%	1%	0%	98%	Large site started but retained as an allocation	Use of the Sequential Approach means, given the size of the site, development can be placed away from Flood Zones 2 and 3, with the area affected by flood risk left undeveloped. Approximately 577 hectares of land is available outside of the Flood Zones.	Yes	5000
SI1	St Ives	St Ives West	53.79	Residential	2%	0%	0%	98%	0	Use of the Sequential Approach means, given the size of the site, development can be placed away from Flood Zones 2 and 3, with the area affected by flood risk left undeveloped. Approximately 52 hectares of land is available outside of Flood Zones 2 and 3.	Yes	506
HELAA 2016	St Ives	Gifford's Park	126.97	Mixed	0%	0%	3%	97%	Discounted for non-flooding reason	Use of the Sequential Approach means, given the size of the site, development can be placed away from Flood Zone 2, with the area affected by Flood Zone 2 left undeveloped. Approximately 122 hectares of land is available outside of Flood Zone 2.	No	0
RA2	Ramsey	Ramsey Gateway	1.8	Residential	0%	4%	6%	90%	0	Use of the Sequential Approach means development can be placed away from Flood Zones 2 and 3, with the area affected by flood risk left undeveloped - approximately 1.9 hectares of land is available for development outside of the Flood Zones.	Yes	52
HELAA 2016	St Neots	Riversfield, Little Paxton	9.86	Mixed	5%	2%	3%	90%	Discounted for non-flooding reasons	Use of the Sequential Approach means, given the size of the site, development can be placed away from Flood Zones 2 and 3, with the small area affected by Flood Zone 2 and 3 left undeveloped.	No	0
SEL2	St Neots	St Neots East	226	Mixed	1%	7%	4%	88%	0	Use of the Sequential Approach means, given the size of the site, development can be placed away from Flood Zones 2 and 3, with the area affected by flooding left undeveloped. Approximately 198 hectares of land is available outside of the Flood Zones.	Yes	3820
LP2013 HU22	Huntingdon	North of Clyde Farm, Godmanchester	2.15	Residential	8%	2%	4%	86%	Discounted for non-flooding reason	Use of the Sequential Approach will be required to place vulnerable development outside of high risk areas. Approximately 1.8 hectares of the site is outside of Flood Zones 2 and 3.	No	0
LP2013 SY6	Sawtry	Bill Hall Way, Sawtry	1.7	Residential	0%	12%	9%	79%	0	Use of the Sequential Approach means development can be placed away from Flood Zones 2 and 3, with the area affected by flood risk left undeveloped - approximately 1.4 hectares of land is available for development outside of the Flood Zone 2 and 3.	Yes	0

### Do the sites passing the sequential test collectively meet objectively assessed needs?

Housing requirement (A)	20,100
Completions and commitments (B)	4,409
Allocations wholly within flood zone 1 (C)	6,639
Allocations with 75% of the site within flood zone 1 (C2)	9,378

<b>Total (D)</b>	<b>20,426</b>
Additional allocations required to meet objectively assessed needs (A) – (D)	-326
Do the sites passing the sequential test at this point collectively meet objectively assessed needs?	<b>Yes</b>

## Step 2 Can development be allocated in the lowest risk sites available in flood zone 2?

1.1 Despite meeting the housing requirement, it is considered worthwhile to assess additional sites to increase flexibility of supply, and to take advantage of specific regeneration opportunities.

### 100% of site lies within Flood Zone 1 or 2

Site ref	SPA	Site name	Area (ha)	Type of development	FZ3b	FZ3a	FZ2	FZ1	uFMfSW 30yr	uFMfSW 100yr	uFMfSW 1,000yr	Historic Flood Map	Reservoir inundation mapping	Non-flooding factor	Comment	Add into housing figures?	Dwellings to 2036
HU14	Huntingdon	Brampton Park Golf Club Practice Ground	2.96	Residential	0%	0%	59%	41%	0%	0%	6%	0%	100%	0	Use of the Sequential Approach is limited due to the amount of the site that is covered by Flood Zone 2; therefore any Highly Vulnerable development placed within Flood Zone 2 will be required to pass the Exception Test. As less than half the site is in Flood Zone 1, there may be implications for the amount and type of development for the site.	Yes	65
HU9	Huntingdon	Main Street, Huntingdon	1.2	Residential	0%	0%	100%	0%	1%	21%	39%	100%	100%	0	Use of the Sequential Approach is limited due to the site being located entirely within Flood Zone 2; therefore any Highly Vulnerable development placed within Flood Zone 2 will be required to pass the Exception Test. Safe access and egress is not considered an issue, although climate change may increase the extent of surface water and fluvial flooding in the future and have the potential to affect routes.	Yes	30

# Appendix 1: Sequential Test for housing and mixed sites (which include housing)

Huntingdonshire Local Plan | Huntingdonshire Local Plan to 2036: Sequential test for flood risk

## Do the sites passing the sequential test collectively meet objectively assessed needs?

Housing requirement (A)	20,100
Completions and commitments (B)	4,409
Allocations wholly within flood zone 1 (C)	6,639
Allocations with 75% of the site within flood zone 1 (C1.1)	9,378
>100% of site lies within Flood Zone 1 or 2 (C2.0)	95
<b>Total (D)</b>	<b>20,521</b>
Additional allocations required to meet objectively assessed needs (A) – (D)	-421
Do the sites passing the sequential test at this point collectively meet objectively assessed needs?	<b>Yes</b>

# Sequential Test for housing and mixed sites (which include housing) Appendix 1:

Huntingdonshire Local Plan | Huntingdonshire Local Plan to 2036: Sequential test for flood risk

## >75% of site lies within Flood Zone 1 or 2

Site ref	SPA	Site name	Area (ha)	Type of development	FZ3b	FZ3a	FZ2	FZ1	uFMfSW 30yr	uFMfSW 100yr	uFMfSW 1,000yr	Historic Flood Map	Reservoir inundation mapping	Non-flooding factor	Comment	Add into housing figures?	Dwellings to 2036
ECS+13	Huntingdon	Thrapston Road, north and west of Church Road	5.74	Residential	7%	10%	24%	59%	0%	1%	5%	32%	100%	0	Use of the Sequential Approach will be required to place vulnerable development outside of high risk areas. Safe access and egress is not affected by flooding. Approximately 3.2 hectares of the site is outside of Flood Zones 2 and 3.	Yes	0
HU7	Huntingdon	Gas Depot, Mill Common, Huntingdon	0.64	Residential	8%	0%	36%	56%	0%	0%	0%	47%	100%	0	Use of the Sequential Approach means development may be placed away from Flood Zones 2 and 3, with the area affected by the Flood Zones left undeveloped - approximately 0.35 hectares of land is available for development outside of the Flood Zones.	Yes	11
HU13	Huntingdon	Brampton Park	34.4	Mixed	7%	6%	37%	50%	0%	1%	15%	0%	193%	Large site started but retained as an allocation	Use of the Sequential Approach means development can be placed away from Flood Zones 2 and 3, with the area affected by flood risk left undeveloped - approximately 17.3 hectares of land is available for development outside of the Flood Zones.	Yes	600
SN1	St Neots	St Mary's Urban Village, St Neots	0.9	Mixed	7%	6%	88%	0%	0%	0%	1%	100%	1%	Small part of site has had development started on it.	The majority of the site is located in Flood Zone 2 and it is therefore not feasible to place development outside of Flood Zones 2 and 3. This may have implications for the amount and type of development for the site. Any Highly Vulnerable development placed within Flood Zone 2 will be required to pass the Exception Test. The main access and egress routes are affected by flooding, therefore safe access and egress will be required by development, or safe refuge provided if evacuation is not possible during a flood. Climate change may increase the extent of surface water and fluvial flooding in the future and have the potential to affect routes.	Yes	40

# Appendix 1: Sequential Test for housing and mixed sites (which include housing)

Huntingdonshire Local Plan | Huntingdonshire Local Plan to 2036: Sequential test for flood risk

## Do the sites passing the sequential test collectively meet objectively assessed needs?

Housing requirement (A)	20,100
Completions and commitments (B)	4,409
Allocations wholly within flood zone 1 (C)	6,639
Allocations with 75% of the site within flood zone 1 (C1.1)	9,378
>100% of site lies within Flood Zone 1 or 2 (C2.0)	95
>75% of site lies within Flood Zone 1 or 2 (C2.1)	651
<b>Total (D)</b>	<b>21,172</b>
Additional allocations required to meet objectively assessed needs (A) – (D)	-1,072
Do the sites passing the sequential test at this point collectively meet objectively assessed needs?	<b>Yes</b>

### Step 3 Can development be allocated within the lowest risk sites available in flood zone 3?

>65% of site lies within Flood Zone 1 or 2

Site ref	SPA	Site name	Area (ha)	Type of development	FZ3b	FZ3a	FZ2	FZ1	uFMfSW 30yr	uFMfSW 100yr	uFMfSW 1,000yr	Historic Flood Map	Reservoir inundation mapping	Non-flooding factor	Comment	Add into housing figures?	Dwellings to 2036
HU17	Huntingdon	RGE Engineering, Godmanchester	2.57	Residential	24%	3%	7%	66%	0%	0%	4%	100%	99%	0	Use of the Sequential Approach will be required to place vulnerable development outside of high risk areas. Safe access and egress is potentially an issue as the B1044 is affected by fluvial flooding to the north and the south of the site. Climate change may increase the extent of surface water flooding in the future and have the potential to affect routes further.	Yes	90
SN3	St Neots	Cromwell Road North, St Neots	2.61	Residential	32%	2%	2%	64%	6%	15%	22%	1%	0%	0	Risk to development could be reduced through using the Sequential Approach to place development outside of the Flood Zones. Safe access and egress is not considered an issue, although climate change may increase the extent of surface water and fluvial flooding in the future and have the potential to affect routes. The watercourse is culverted under the site; it is possible that the culvert has not been taken into consideration when defining Flood Zones. Detailed modelling as part of a site specific flood risk assessment will confirm whether the culvert has been accounted for and will provide more accurate Flood Zones. Regardless of whether the site is in the Flood Zones or not, the culvert will need to be assessed to determine whether there is sufficient capacity to convey water in the future with potential increases in flow due to climate change. The potential impacts of blockage of the culvert should also be investigated and any affect on the development site should be mitigated against.	Yes	80

# Appendix 1: Sequential Test for housing and mixed sites (which include housing)

Huntingdonshire Local Plan | Huntingdonshire Local Plan to 2036: Sequential test for flood risk

## Do the sites passing the sequential test collectively meet objectively assessed needs?

Housing requirement (A)	20,100
Completions and commitments (B)	4,409
Allocations wholly within flood zone 1 (C)	6,639
Allocations with 75% of the site within flood zone 1 (C1.1)	9,378
>100% of site lies within Flood Zone 1 or 2 (C2.0)	95
>75% of site lies within Flood Zone 1 or 2 (C2.1)	651
>65% of site lies within Flood Zone 1 or 2 (C3)	170
<b>Total (D)</b>	<b>21,342</b>
Additional allocations required to meet objectively assessed needs (A) – (D)	-1,242
Do the sites passing the sequential test at this point collectively meet objectively assessed needs?	<b>Yes</b>

## Step 4 Exception Test - Is development appropriate in remaining areas?

1.2 Despite meeting the housing requirement, it is considered worthwhile to assess additional sites, to provide flexibility of supply, and where there are specific regeneration opportunities.

### Sites requiring application of the exception test

SPA	Site name	Area (ha)	Type of development	FZ3b	FZ3a	FZ2	FZ1	uFMfSW 30yr	uFMfSW 100yr	uFMfSW 1,000yr
Huntingdon	Tyrell's Marina, Godmanchester	0.3	Mixed	77%	9%	2%	12%	0%	0%	2%
St Ives	West of London Road, St Ives	1.51	Residential	0%	100%	0%	0%	0%	0%	<1%
St Ives	West of Cullum Farm, Hemingford Grey	1.31	Residential	0%	99%	1%	0%	<1%	2%	6%
Ramsey	Newtown Road, Ramsey	0.39	Residential	0%	84%	10%	6%	0%	<1%	1%
St Neots	Former Youth Centre, Priory Road, St Neots	0.47	Residential	6%	93%	1%	0%	0%	0%	4%
St Neots	Loves Farm Reserved Site, St Neots	1.02	Residential	26%	37%	36%	0%	10%	2%	74%
St Ives	Former car showroom, London Road, St Ives	1.4	Residential	0%	58%	42%	0%	0%	0%	0%
St Ives	Vindis Car Show Room, St Ives	2.77	Residential	7%	93%	0%	0%	0%	1%	14%
Ramsey	Ramsey Gateway (High Lode)	2.57	Residential	1%	82%	2%	16%	1%	1%	8%

# Appendix 1: Sequential Test for housing and mixed sites (which include housing)

Huntingdonshire Local Plan | Huntingdonshire Local Plan to 2036: Sequential test for flood risk

## Tyrell's Marina, Godmanchester

<b>Area (ha)</b>	0.3	
<b>Type of development</b>	Mixed – commercial uses at ground floor level, with an element of residential	
<b>Will the site provide wider sustainability benefits to the community that outweigh flood risk?</b>  Source: Sustainability Appraisal Summary	<b>Positive</b>	<b>Negative</b>
	<ul style="list-style-type: none"> <li>Previously developed</li> <li>Very sustainable location for development with good access to services, facilities, open space and employment opportunities.</li> <li>Adjacent to a cluster of buildings of strong historic distinctiveness but site currently has a detrimental impact so redevelopment could generate improvements.</li> <li>Provides a limited increase in residential accommodation.</li> </ul>	<ul style="list-style-type: none"> <li>The site butts directly up to the A14 flyover which may have detrimental impacts in terms of noise and air pollution. However, such impacts are likely to diminish with the completion of the A14 upgrade scheme which is currently in progress.</li> </ul>
	<b>Conclusion:</b> Yes. The site provides wider sustainability benefits through regeneration of a very sustainably located site.	
<b>Will the site be safe for its lifetime, without increasing flood risk elsewhere and where possible reduce flood risk overall?</b>  SFRA level 2  Site specific FRA related to 16/00906/FUL	<b>Selected SFRA level 2 evidence</b>	
	<ul style="list-style-type: none"> <li>Given the majority of the site is within the Functional Floodplain the type and amount of development within the site will be restricted.</li> <li>Safe access and egress is potentially an issue as the route from the site is affected by fluvial flooding to the north and surface water flooding to the south.</li> <li>Given the majority of the site is within flood zone 3 flood compensation will be required on a level for level volume for volume basis for any proposed loss of floodplain. Therefore land within the vicinity and outside the proposed site will be required for flood compensation. Prospects for effective mitigation would need to be established before taking the site forward.</li> </ul>	
	<b>Site specific FRA evidence, April 2017</b> <ul style="list-style-type: none"> <li>The floor level of the units will be a minimum of 10.45m and a flood defence wall and raised land will be provided with a crest level of 10.45m to protect the site and Bridge Place from flooding.</li> <li>The existing site is shown to be in Flood Zone 3 on the Environment Agency's mapping and with the proposed ground level remodelling and the perimeter wall included the Environment Agency's Lower Ouse Catchment Model shows the site outside flood zone 3 and it would be in Flood Zone 1. In accordance with the Planning Practice Guidance for the National Planning Policy Framework this is suitable for residential development.</li> <li>There will be an emergency warning system installed to alert occupiers if the vehicular access under the A14 is at risk of being flooded. This is in addition to all purchasers being advised to enrol in the Environment Agency's Flood Warning system. When the access under the A14 for vehicles is cut off an emergency access for vehicles via Bridge Place will be available.</li> <li>The surface water drainage proposal is to maintain the existing discharge direct to the River Great Ouse with a new outfall using a flap valve and a non-return valve together with a surface water pump to deal with any surface water which cannot discharge by gravity to the river in times of flood. The use of infiltration drainage adjacent to the river is considered to be inappropriate.</li> </ul>	
<b>Will the site be safe for its lifetime...?</b>  <b>...without increasing flood risk elsewhere and where possible reducing flood risk overall?</b>  It is understood that the Environment Agency has yet to agree with proposed flood risk mitigation for this site. Although further information is required and has not been forthcoming changes have been made to the allocation (residential capacity not specified, to be determined through a design led approach addressing all aspects of flood risk first; flood plain compensation required) so that it is possible to conclude that the site passes this part of the exception test.		
<b>Conclusion:</b> Yes		
<b>Conclusion – does the site pass the exception test?</b>	Yes	

## West of London Road, St Ives

Area (ha)	1.51	
Type of development	Residential	
<b>Will the site provide wider sustainability benefits to the community that outweigh flood risk?</b>  Sustainability Appraisal Summary	<b>Positive</b>	<b>Negative</b>
	<ul style="list-style-type: none"> <li>• Within accessibility thresholds for a food shop, employment, and public transport</li> <li>• Provides a relatively limited increase in residential accommodation, including the potential for affordable housing</li> </ul>	<ul style="list-style-type: none"> <li>• Green field land</li> <li>• Not within accessibility thresholds for open space/sports, health or education</li> </ul>
	<b>Conclusion:</b> No. The site is in a relatively sustainable location, but this does not outweigh flood risk given the relatively limited amount of housing it provides, and that the site is greenfield.	
<b>Will the site be safe for its lifetime, without increasing flood risk elsewhere and where possible reduce flood risk overall?</b>  SFRA level 2  No site specific FRA	<b>Selected SFRA level 2 evidence</b> <ul style="list-style-type: none"> <li>• The whole of the site is located in Flood Zone 2 and 3; therefore the amount and type of development may be limited. This is particularly important due to the lack of safe access and egress when the River Great Ouse is in flood.</li> <li>• Given the whole of the site is within flood zone 2 and 3 flood compensation will be required on a level for level volume for volume basis for any proposed loss of floodplain. Therefore land within the vicinity and outside the proposed site may be required for flood compensation. Prospects for effective mitigation would need to be established before taking the site forward.</li> </ul>	
	<b>Will the site be safe for its lifetime...?</b>  <b>...without increasing flood risk elsewhere and where possible reducing flood risk overall?</b>  Further site-specific flood risk mitigation information has been supplied such that it possible to conclude that the site passes this part of the exception test.	
	<b>Conclusion:</b> Yes	
<b>Conclusion – does the site pass the exception test?</b>	No	

# Appendix 1: Sequential Test for housing and mixed sites (which include housing)

Huntingdonshire Local Plan | Huntingdonshire Local Plan to 2036: Sequential test for flood risk

## West of Cullum Farm, Hemingford Grey

Area (ha)	1.31	
Type of development	Residential	
<b>Will the site provide wider sustainability benefits to the community that outweigh flood risk?</b>  Sustainability Appraisal Summary	<b>Positive</b>	<b>Negative</b>
	<ul style="list-style-type: none"> <li>• Within accessibility thresholds for employment, and public transport</li> <li>• Provides a relatively limited increase in residential accommodation, including the potential for affordable housing</li> </ul>	<ul style="list-style-type: none"> <li>• Less than half the site is developed.</li> <li>• Not within accessibility thresholds for open space/sports, health, education or a food shop</li> </ul>
	<b>Conclusion:</b> No. The site is not in a very sustainable location in comparison with other available sites, less than half the site is previously developed, and development of this site would only provide a relatively limited amount of housing.	
<b>Will the site be safe for its lifetime, without increasing flood risk elsewhere and where possible reduce flood risk overall?</b>  SFRA level 2  No site specific FRA	<b>Selected SFRA level 2 evidence</b>	
	<ul style="list-style-type: none"> <li>• Nearly the whole site is within flood zone 3a, therefore the amount and type of development may be limited. This is particularly important due to the lack of safe access and egress when the River Great Ouse is in flood.</li> <li>• The site is, to some extent, afforded some protection from flood defences. These defences have a standard of protection of 1% AEP and therefore it is unlikely the site will flood until events of a magnitude higher than the 1% AEP flood. However, there is still a residual risk of flooding should the defence fail (breach) due to the potential for rapid inundation of water to the site.</li> <li>• Given that nearly the whole of the site is within flood zone 3a flood compensation will be required on a level for level volume for volume basis for any proposed loss of floodplain. Therefore land within the vicinity and outside the proposed site may be required for flood compensation.</li> </ul>	
	<p><b>Will the site be safe for its lifetime...?</b></p> <p><b>...without increasing flood risk elsewhere and where possible reducing flood risk overall?</b></p> <p>Further site-specific flood risk mitigation information has not been forthcoming and so it is not possible to conclude that the site passes this part of the exception test.</p>	
<b>Conclusion:</b> No		
<b>Conclusion – does the site pass the exception test?</b>	No	

## Newtown Road, Ramsey

Area (ha)	0.39	
Type of development	Residential	
<b>Will the site provide wider sustainability benefits to the community that outweigh flood risk?</b>  Sustainability Appraisal Summary	<b>Positive</b>	<b>Negative</b>
	<ul style="list-style-type: none"> <li>The land is brownfield land. Given its previous commercial use, high quality development would offer the opportunity to improve the streetscape.</li> <li>Located in close proximity to services, employment, public transport and open space</li> <li>Provides a limited increase in residential accommodation</li> </ul>	<ul style="list-style-type: none"> <li>It is possible that development could lead to minor light pollution over the adjoining open countryside.</li> </ul>
	<b>Conclusion:</b> Yes. The site provides wider sustainability benefits through regeneration of a sustainably located site.	
<b>Will the site be safe for its lifetime, without increasing flood risk elsewhere and where possible reduce flood risk overall?</b>  SFRA level 2  No site specific FRA	<b>Selected SFRA level 2 evidence</b>  <i>This site is in an Internal Drainage Board area, in which water is managed via a pumped system. For sites in this area, SFRA level 2 evidence excludes information on depth, hazard and velocity and climate change which are only available through detailed modelling. A detailed hydraulic model of the relevant board system should be produced as part of the evidence base for any associated detailed flood risk assessment in the IDB area.</i> <ul style="list-style-type: none"> <li>Use of the Sequential Approach will be required to place vulnerable development outside of high risk areas. Given the majority of the site is located in Flood Zones 2 and 3 this may restrict the type and amount of development within the site.</li> <li>Access and egress is potentially at risk from fluvial flooding; however, there is an alternative safe access route along Newtown Road.</li> </ul> <b>Will the site be safe for its lifetime...?</b>  <b>...without increasing flood risk elsewhere and where possible reducing flood risk overall?</b>  Although some further site-specific flood risk mitigation information has been received it has been concluded that the site does not pass this part of the exception test.	
<b>Conclusion: No</b>		
<b>Conclusion – does the site pass the exception test?</b>	No	

# Appendix 1: Sequential Test for housing and mixed sites (which include housing)

Huntingdonshire Local Plan | Huntingdonshire Local Plan to 2036: Sequential test for flood risk

## Former Youth Centre, Priory Road, St Neots

Area (ha)	0.47	
Type of development	Residential	
<b>Will the site provide wider sustainability benefits to the community that outweigh flood risk?</b>  Sustainability Appraisal Summary  Site specific FRA related to 15/00634/FUL	<b>Positive</b>	<b>Negative</b>
	<ul style="list-style-type: none"> <li>Site is previously developed.</li> <li>Redevelopment could enhance the character &amp; appearance of the conservation area</li> <li>Located in close proximity to services, employment, public transport and open space</li> <li>Provides a limited increase in residential accommodation</li> </ul>	<ul style="list-style-type: none"> <li>Not within accessibility thresholds for education</li> </ul>
	<b>Conclusion:</b> Yes. This site is in a sustainable location, and is previously developed site where development could enhance the character and appearance of the conservation area.	
<b>Will the site be safe for its lifetime, without increasing flood risk elsewhere and where possible reduce flood risk overall?</b>  SFRA level 2  Site specific FRA related to 15/00634/FUL	<b>Selected SFRA level 2 evidence</b> <ul style="list-style-type: none"> <li>Use of the Sequential Approach is limited as the whole of the site is located in Flood Zone 3; therefore any development will be required to pass the Exception Test.</li> <li>Flood compensation will be required on a level for level volume for volume basis for any proposed loss of floodplain. Therefore land within the vicinity and outside the proposed site will be required for flood compensation. Prospects for effective mitigation would need to be established before taking the site forward.</li> <li>Safe access and egress is at risk from both fluvial and surface water flooding; in order to pass the Exception Test, development will need to ensure that safe access and egress can be provided for the lifetime of the development. Development should also ensure that there is no increase in flood risk that may exacerbate safe access and egress.</li> </ul>	
	<b>Site specific FRA evidence, including latest evidence April 2015</b> <ul style="list-style-type: none"> <li>Site specific FRA states that development can be made safe and that compensatory flood plain provision can be provided on-site.</li> </ul>	
	<b>Will the site be safe for its lifetime...?</b>  <b>...without increasing flood risk elsewhere and where possible reducing flood risk overall?</b>  It has been concluded that the site passes this part of the exception test.	
<b>Conclusion:</b> Yes		
<b>Conclusion – does the site pass the exception test?</b>	<b>Yes</b>	

## Loves Farm Reserved Site, St Neots

Area (ha)	1.02	
Type of development	Residential	
<b>Will the site provide wider sustainability benefits to the community that outweigh flood risk?</b>  Sustainability Appraisal Summary	<b>Positive</b>	<b>Negative</b>
	<ul style="list-style-type: none"> <li>There is the opportunity to add to the townscape by developing the site with an attractive building.</li> <li>Some residential accommodation will be provided on site</li> <li>Within accessibility thresholds for health, education, a food shop and employment</li> </ul>	<ul style="list-style-type: none"> <li>Not within accessibility thresholds for open space/sports</li> </ul>
	<b>Conclusion:</b> No. The site is in a relatively sustainable location, but this does not outweigh flood risk given the relatively limited amount of housing it provides, and that the site is greenfield.	
<b>Will the site be safe for its lifetime, without increasing flood risk elsewhere and where possible reduce flood risk overall?</b>  SFRA level 2  Site specific FRA related to 1300389OUT	<p><b>Selected SFRA level 2 evidence</b></p> <p><i>The SFRA notes that its mapping for this site is based on results from a 2D model developed for this SFRA. This model does not take into account the upstream attenuation on the Fox Brook.</i></p> <ul style="list-style-type: none"> <li>Use of the Sequential Approach will be required to place vulnerable development outside of high risk areas. As the whole of the site is located in the Flood Zones this may restrict the type and amount of development within the site.</li> <li>Given the whole of the site is within flood zone 3 and 2 flood compensation will be required on a level for level volume for volume basis for any proposed loss of floodplain. Therefore land within the vicinity and outside the proposed site may be required for flood compensation,</li> <li>Safe access and egress is not considered a significant issue as there are alternative routes, although climate change may increase the extent of surface water and fluvial flooding in the future and have the potential to affect routes.</li> </ul> <p><b>Site specific FRA evidence, February 2013</b></p> <ul style="list-style-type: none"> <li>Hydraulic modelling included in a site specific FRA confirms that the site is in the lower flood risk zone of Flood Zone 2.</li> <li>No flood related risks should remain after measures have been implemented to provide a sustainable drainage system and setting the Finish Floor Levels of properties above the 1 in 1000 year flood levels.</li> <li>Water quantity improvements will be provided for the development through the use of SuDS</li> <li>Betterment is provided in terms of Peak flow downstream of the development with the development it will be attenuated to a 5 l/s discharge rate.</li> </ul> <p><b>Will the site be safe for its lifetime...?</b></p> <p><b>...without increasing flood risk elsewhere and where possible reducing flood risk overall?</b></p> <p>Given that the SFRA mapping does not take into account upstream attenuation on the Fox Brook, the hydraulic modelling used in the site specific FRA provides a better picture of actual flood risk on this site. The site specific FRA states that the site will be safe for its lifetime, and that development can reduce flood risk overall.</p>	
<b>Conclusion:</b> Yes. The site specific FRA shows that the site will be safe for its lifetime, and that development can reduce flood risk overall.		
<b>Conclusion – does the site pass the exception test?</b>	<b>N/A</b> – this site is not now subject to the exception test, passing the sequential test at stage 2. It is therefore considered suitable for allocation	

# Appendix 1: Sequential Test for housing and mixed sites (which include housing)

Huntingdonshire Local Plan | Huntingdonshire Local Plan to 2036: Sequential test for flood risk

## Former car showroom, London Road, St Ives

Area (ha)	1.4	
Type of development	Residential	
<b>Will the site provide wider sustainability benefits to the community that outweigh flood risk?</b>  Sustainability Appraisal Summary	<b>Positive</b> <ul style="list-style-type: none"> <li>The site is previously developed land.</li> <li>Higher density development would be appropriate on this land given its location close to the town centre.</li> <li>Development has the potential to improve the character and appearance of the conservation area.</li> <li>Within accessibility thresholds for open space/sports, cultural/social activities, health, and employment</li> <li>Some residential accommodation will be provided on site</li> </ul>	<b>Negative</b> <ul style="list-style-type: none"> <li>Not within accessibility thresholds for education, a food shop and public transport</li> </ul>
	<b>Conclusion:</b> Yes. The site provides wider sustainability benefits through regeneration of a relatively sustainably located site, where development could improve the character and appearance of the conservation area.	
<b>Will the site be safe for its lifetime, without increasing flood risk elsewhere and where possible reduce flood risk overall?</b>  SFRA level 2  No site specific FRA	<b>Selected SFRA level 2 evidence</b> <ul style="list-style-type: none"> <li>Use of the Sequential Approach is limited due to the whole of the site being covered by Flood Zones 2 and 3; therefore the amount and type of development for the site may be restricted.</li> <li>Given the whole of the site is within flood zone 3 and 2 flood compensation will be required on a level for level volume for volume basis for any proposed loss of floodplain. Therefore land within the vicinity and outside the proposed site may be required for flood compensation.</li> <li>Prospects for effective mitigation would need to be established before taking the site forward.</li> <li>The site is afforded some protection from flood embankments. These defences have a 1% AEP standard of protections; however, there is still a residual risk of flooding should the defence fail (breach). There is also the potential for the defence to overtop in the future due to climate change. Therefore, it is important that the defences in this area continue to be maintained in line with catchment policy and that any development accounts for the potential residual risk.</li> <li>Safe access and egress is at risk from fluvial flooding; in order to pass the Exception Test, development will need to ensure that safe access and egress can be provided for the lifetime of the development. Development should also ensure that there is no increase in flood risk that may exacerbate safe access and egress.</li> </ul>	
	<b>Will the site be safe for its lifetime...?</b>  <b>...without increasing flood risk elsewhere and where possible reducing flood risk overall?</b>  Further site-specific flood risk mitigation information has been received and it has been concluded that the site passes this part of the exception test.	
<b>Conclusion:</b> Yes		
<b>Conclusion – does the site pass the exception test?</b>	<b>Yes</b>	

## Vindis Car Show Room, St Ives

Area (ha)	2.27	
Type of development	Residential	
<b>Will the site provide wider sustainability benefits to the community that outweigh flood risk?</b>  Sustainability Appraisal Summary	<b>Positive</b>	<b>Negative</b>
	<ul style="list-style-type: none"> <li>• Within accessibility thresholds for open space/sports, cultural/social activities, a food shop (although the shop provides only a limited range of food), employment and public transport</li> <li>• Residential accommodation will be provided on site</li> </ul>	<ul style="list-style-type: none"> <li>• The site is previously developed but is currently in an alternative use and is not in need of regeneration</li> <li>• Not suitable for higher density development as it is located at the edge of St Ives and at an entrance to the town.</li> <li>• The site is prominently placed on the road and therefore there should be actions taken to minimise light and noise pollution.</li> <li>• Not within accessibility thresholds for health or education</li> </ul>
<b>Conclusion:</b> No. Although the site is relatively sustainably located, it is currently in an alternative use, and is not in need of regeneration.		
<b>Will the site be safe for its lifetime, without increasing flood risk elsewhere and where possible reduce flood risk overall?</b>  SFRA level 2  No site specific FRA	<b>Selected SFRA level 2 evidence</b> <ul style="list-style-type: none"> <li>• The whole of the site is located in Flood Zone 3; therefore the amount and type of development may be limited.</li> <li>• This is particularly important due to the lack of safe access and egress when the River Great Ouse is in flood.</li> <li>• The site is, to some extent, afforded some protection from flood defences. These defences have a standard of protection of 1% AEP and therefore it is unlikely the site will flood until events of a magnitude higher than the 1% AEP flood.</li> <li>• Given the whole of the site is within flood zone 3 flood compensation will be required on a level for level volume for volume basis for any proposed loss of floodplain. Therefore land within the vicinity and outside the proposed site may be required for flood compensation.</li> </ul>	
	<b>Will the site be safe for its lifetime...?</b>  <b>...without increasing flood risk elsewhere and where possible reducing flood risk overall?</b>  Further site-specific flood risk mitigation information has been received and it is possible to conclude that the site passes this part of the exception test.	
<b>Conclusion:</b> Yes		
<b>Conclusion – does the site pass the exception test?</b> No		

# Appendix 1: Sequential Test for housing and mixed sites (which include housing)

Huntingdonshire Local Plan | Huntingdonshire Local Plan to 2036: Sequential test for flood risk

## Ramsey Gateway (High Lode)

Area (ha)	2.57	
Type of development	Residential	
Will the site provide wider sustainability benefits to the community that outweigh flood risk?  Sustainability Appraisal Summary	<b>Positive</b> <ul style="list-style-type: none"> <li>Although more than half the site is classed as grade 1 agricultural land, it would not be capable of being farmed and should be considered as urban land.</li> <li>Higher densities are considered to be appropriate.</li> <li>The western part lies in a conservation area. Appropriate redevelopment could provide the opportunity to enhance its character and appearance.</li> <li>Within accessibility thresholds for open space, health, education, a food shop, employment and public transport</li> </ul>	<b>Negative</b>
	<b>Conclusion:</b> Yes. The site provides wider sustainability benefits through development of a very sustainably located site. Since the site is partially previously developed and on the other part is land that could not be farmed effectively, development here would be effective use of land.	
Will the site be safe for its lifetime, without increasing flood risk elsewhere and where possible reduce flood risk overall?  SFRA level 2  Site specific FRA related to 05/01658/OUT	<b>Selected SFRA level 2 evidence</b>  <i>NB. This site is in an Internal Drainage Board area, in which water is managed via a pumped system. SFRA level 2 evidence excludes information on depth, hazard and velocity and climate change which are only available through detailed modelling. A detailed hydraulic model of the relevant board system should be produced as part of the evidence base for any associated detailed flood risk assessment in the IDB area.</i> <ul style="list-style-type: none"> <li>Use of the Sequential Approach will be required to place vulnerable development outside of high risk areas. Given the majority of the site is located in Flood Zones 2 and 3 this may restrict the type and amount of development within the site.</li> <li>Access and egress is potentially at risk from fluvial flooding; however, there is an alternative safe access route along Great Whyte.</li> </ul> <b>Site specific FRA evidence, September 2005</b> <ul style="list-style-type: none"> <li>The site is partly in Flood Zones 1, 2 and 3, but the actual risk of the site flooding from any Environment Agency main river or Middle Level river system is very low (less than 1%).</li> <li>Although the site is located within two Internal Drainage Districts with a standard drainage of 1 in 25 years, this accords with DEFRA guidelines for rural development. A minimum of 900mm freeboard is provided within the main drainage design standard to the lowest land level which provides further storage to cater for events greater than 1 in 25 years.</li> <li>Floor levels will be raised above existing ground level.</li> </ul> <b>Will the site be safe for its lifetime...?</b>  <b>...without increasing flood risk elsewhere and where possible reducing flood risk overall?</b>  Further site-specific flood risk mitigation information based upon up to date evidence is required to make a conclusion as to whether the site passes this part of the exception test, but has not been forthcoming.	
	<b>Conclusion:</b> Further information required to make a conclusion	
<b>Conclusion – does the site pass the exception test?</b>	<b>N/A</b> – this site is not now subject to the exception test, as there has been a technical start to development on site. The allocation will be retained to guide any revised proposals.	

## Appendix 2: Sequential Test for Employment

### Step 1: Can development be allocated in flood zone 1?

#### 100% of site lies within Flood Zone 1

Site ref	SPA	Site name	Area (ha)	FZ3b	FZ3a	FZ2	FZ1	Non-flooding factor	Comment
KB2	Kimbolton	South of Bicton Industrial Estate, Kimbolton	1.3	0%	0%	0%	100%	0	
LP2013 SY5	Sawtry	North of Blackhorse Ind. Estate, Sawtry	1.6	0%	0%	0%	100%	Discounted for non-flooding reason	
HU15	Huntingdon	Park View Garage, Brampton	0.41	0%	0%	0%	100%	0	
LP2013 SY4	Sawtry	South of St Andrews Way, Sawtry	1.41	0%	0%	0%	100%	Discounted for non-flooding reason	
HU5	Huntingdon	West of Edison Bell Way, Huntingdon	0.5	0%	0%	0%	100%	0	Allocated for long stay public car parking
HU3	Huntingdon	West of Railway, Brampton Rd, Huntingdon	2	0%	0%	0%	100%	0	
YX2	Yaxley	Yax Pak, Yaxley	3.2	0%	0%	0%	100%	0	

#### >75% of site lies within Flood Zone 1

Site ref	SPA	Site name	Area (ha)	FZ3b	FZ3a	FZ2	FZ1	Non-flooding factor	Comment
SI3	St Ives	Giffords Farm, St Ives	5.57	0%	2%	13%	85%	0	Use of the Sequential Approach means, given the size of the site, development can be placed away from the Flood Zones 2 and 3, with the small area affected by flooding left undeveloped. Approximately 4.7 hectares of land is available outside of the Flood Zones.
LP2013 SY1	Sawtry	East of Brookside, Sawtry	4	0%	15%	7%	78%	Discounted for non-flooding reason	Use of the Sequential Approach means development can be placed away from Flood Zones 2 and 3, with the area affected by flood risk left undeveloped - approximately 3.2 hectares of land is available for development outside of Flood Zone 2 and 3.

## Appendix 2: Sequential Test for Employment

Huntingdonshire Local Plan | Huntingdonshire Local Plan to 2036: Sequential test for flood risk

### Step 2 Can development be allocated in the lowest risk sites available in flood zone 2?

#### 100% of site lies within Flood Zone 1 or 2

Site ref	SPA	Site name	Area (ha)	FZ3b	FZ3a	FZ2	FZ1	uFMfSW 30yr	uFMfSW 100yr	uFMfSW 1,000yr	Historic Flood Map	Reservoir inundation mapping	Non-flooding factor	Comment
LP2013 SN4	St Neots	St Neots Fire Station and vacant land, St Neots	0.41	0%	0%	68%	32%	11%	10%	21%	100%	91%	Discounted for non-flooding reason	Use of the Sequential Approach is limited due to the amount of the site that is covered by Flood Zone 2; therefore any Highly Vulnerable development placed within Flood Zone 2 will be required to pass the Exception Test. As less than half the site is in Flood Zone 1, there may be implications for the amount and type of development for the site. Access and egress routes are at risk from both fluvial and surface water flooding; in order to pass the Exception Test, development will need to ensure that safe access and egress can be provided for the lifetime of the development. Development should also ensure that there is no increase in flood risk that may exacerbate flooding to routes.
T/C-SN2	St Neots	Huntingdon Street, St Neots	1	0%	0%	100%	0%	0%	2%	9%	93%	90%	Discounted for non-flooding reason	Use of the Sequential Approach is limited due to the site being located entirely within Flood Zone 2; the amount and type of development may be restricted and any Highly Vulnerable development placed within the Flood Zone will be required to pass the Exception Test. Safe access and egress is potentially an issue as all routes are affected by the 0.1% AEP flood; development will have to consider how to ensure safe access and egress can be provided, or should consider provision of safe refuge in the event that occupiers are unable to evacuate during a flood. Climate change may also increase the extent of surface water flooding in the future and have the potential to affect routes.

## Step 3 Can development be allocated within the lowest risk sites available in flood zone 3?

Site ref	SPA	Site name	Area (ha)	FZ3b	FZ3a	FZ2	FZ1	uFMfSW 30yr	uFMfSW 100yr	uFMfSW 1,000yr	Historic Flood Map	Reservoir inundation mapping	Non-flooding factor	Comment
LP2013 RA1	Ramsey	South of The Foundry, Factory Bank, Ramsey	1.52	0%	100%	0%	0%	0%	0%	1%	0%	0%	Discounted for non-flooding reason	Given the whole of the site is located in Flood Zone 3 this may restrict the type and amount of development within the site. Safe access and egress is at risk from both fluvial and surface water flooding; in order to pass the Exception Test, development will need to ensure that safe access and egress can be provided for the lifetime of the development. Development should also ensure that there is no increase in flood risk that may exacerbate safe access and egress.

### Appendix 3: Sequential Test for retail

- 3.1** Only one potential retail site was tested for the sequential test: Huntingdon Fire Station. Given its location in an area of flood risk and the lack of quantitative capacity for additional retail in Huntingdon, it was clear that this site would not pass the sequential test.