

Matter 8 – Proposed site allocations

St Ives 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 NPPF101. 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 Ives SPA, two 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 Ives SPA

Site	Extent of flood risk & comments
St Ives	
SI2 – St Ives Football Club (30 dwellings)	<ul style="list-style-type: none"> The Environment Agency note widespread surface water flood risk issues and need for a sequential approach (see Appendix 6 to representations made to the submitted plan). As set out above, surface water flood risk should have been factored into the sequential test.
SI4 – Former Car Showroom	<ul style="list-style-type: none"> 58% of the site in Flood Zone 3a and 42% in Flood Zone 2 (sequential test, page 19). Council undertakes exception test and concludes that the benefits through regeneration and improving the character and appearance of the conservation area (sequential test, page 26).

David Fovargue, MRTPI (Technical Director, Wood plc)

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