



Matter 11 – Proposed site allocations

Local 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 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 Local Service Centres, one of the draft allocations 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.

Table 1 Extent of flood risk on allocated sites in the Local Service Centres

Site	Extent of flood risk & comments
BL2 – North of 10 Station Road (30 dwellings)	<ul style="list-style-type: none"> Environment Agency mapping shows clear risks of surface water flooding (Appendix 23 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>, including surface water flooding (a point which the EA have also raised in response to Matter 3).

David Fovargue, MRTPI (Technical Director, Wood plc)

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