

# Huntingdonshire Local Plan to 2036 Examination

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## **EXAM/46: Representations to the Proposed Main Modifications 2018 Consultation (in Document Order)**

### **Part 3 of 3 – MM21 to MM39**

Huntingdonshire District Council  
February 2018

Family or Company Name: Church Commissioners for England  
Agent: Deloitte (Tucker, Nolan)  
PMM: MM21

## Comment

Agent	Mr Nolan Tucker (1184539)
Email Address	[REDACTED]
Company / Organisation	Deloitte LLP
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Consultee	Mr Nolan Tucker (1198417)
Email Address	[REDACTED]
Company / Organisation	Deloitte LLP
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Proposed Main Modifications 2018
Comment by	Deloitte LLP (Mr Nolan Tucker - 1198417)
Comment ID	PMM2018:58
Response Date	29/01/19 14:29
Consultation Point	Proposed Main Modification 21 ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.5
Files	<a href="#">MM21 - Church Commissioners for England.pdf</a>

Please tell us whether you support or object to this proposed main modification. Please note: **Support:** if you select support you will be stating that you think this proposed main modification is both **sound** and **legally compliant** . **Object:** if you select object you will be stating that you think this proposed main modification is either **unsound** and/ or is **not legally compliant** .

Do you  Object

Do you consider this proposed main modification  Not Sound  
to be sound?

It is important to understand how you think this proposed main modification is not sound. Please refer to the 'Proposed Submission Representations Advice Note' for more information about the options here. Please tick all that apply.

**Do you consider this proposed main modification is not sound because it is not...** . Positively prepared

Please say whether you think this proposed main modification is legally compliant. Please refer to the 'Proposed Submission Representations Advice Note' for more information about the issues covered by legal compliance.

**Do you consider this proposed main modification to be legally compliant?** Legally compliant

Please enter your representation here. You should say why you either support this proposed main modification or why you think it is not sound and/ or not legally compliant.

Please note: There are no limits on the length of representations but please be as concise as possible, including only that which is necessary to explain your representation. You can support your representation with supporting documents if you wish (see below) but please include clear references and reasoning as to why any attachments support your representation.

**Note: Any representations that rely entirely on supporting documents and state 'See attached report' or similar for this question will not be accepted.**

**Please enter your representation here.**

These representations are made on behalf of the Church Commissioners for England. This allocation proposes an increase to the size of the existing country park and proposes that it would provide a strategic area of publicly accessible natural green space capable of serving a significant population in and around the Huntingdon Spatial Planning Area. Whilst we note that as part of the MM21 the proposed extension has been reduced (from 44 hectares to 27.5 hectares), a significant part of the proposed Country Park extends on to our client's land. There have been limited discussions between the Council and our client, the Church Commissioners for England, in respect of the delivery of the proposed allocation for county park uses; especially as our clients are a significant landowner of the proposed allocation. We note that as part of the allocation / Policy HU10, there is the requirement for the following: a. provision of additional pedestrian paths including a north to south route via the eastern edge of the island b. provision of interpretation boards, way marking signs and bird watching hides c. management to improve the site's value for biodiversity d. a flood management strategy including appropriate practices including closures to the public during flood events e. a new car park off Huntingdon Road Additionally, it is noted that at paragraph 9.91 of the Main Modifications document, the extension to Hinchingsbrooke Country Park is an important part of the overall strategy to provide strategic green infrastructure alongside development. The policy goes on to say that this extension would increase the size of the Country Park considerably and provide a strategic scale area of publicly accessible natural green space capable of serving a significant population in and around the Huntingdon Spatial Planning Area. Whilst the Church Commissioners support a strategy to provide green infrastructure in the District, we remain of the view that further discussion is required with the Council on how the park will be delivered and the maintenance it will require. We note that at paragraph 9.93 the reference to the land being farmed has been deleted. However, we can confirm the land within our client's ownership is farmed and is within a tenancy to a third party. As stated in our previous response to an earlier stage of the emerging Local Plan, we would have welcomed more comprehensive discussions around the proposed allocation and we hope that should the allocation be found sound that the Council will enter into these discussions as soon as possible.

### **Supporting documents**

If you would like you can support your representation with supporting documents. Please provide a description for any documents you upload and clearly reference them in your representation.

If you want to refer to a publication that is available elsewhere or that is subject to copyright that you do not control please provide a link to a website where it is available or give a full reference (including author(s), full title and date of publication) in your comment.

By submitting a supporting document you give permission for the council to use it for the purposes of drawing up planning policy for Huntingdonshire and to reproduce the document for such purposes.

Please note: There is no limit to the size of documents that can be uploaded but please only upload relevant documents and consider the use of extracts for long documents.

To upload more than one document first select your first document and upload it, then save your comment using the button at the bottom of the page. You can then select another document to upload.

[MM21 - Church Commissioners for England.pdf](#)

Please tell us whether changes can be made to address the issue(s) you have identified.

**Can the issue(s) you have identified be addressed by making changes to the proposed main modification?** Yes

## **Proposed Main Modification reference number MM21**

These representations are made on behalf of the Church Commissioners for England.

This allocation proposes an increase to the size of the existing country park and proposes that it would provide a strategic area of publicly accessible natural green space capable of serving a significant population in and around the Huntingdon Spatial Planning Area.

Whilst we note that as part of the MM21 the proposed extension has been reduced (from 44 hectares to 27.5 hectares), a significant part of the proposed Country Park extends on to our client's land.

There have been limited discussions between the Council and our client, the Church Commissioners for England, in respect of the delivery of the proposed allocation for county park uses; especially as our clients are a significant landowner of the proposed allocation.

We note that as part of the allocation / Policy HU10, there is the requirement for the following:

- a. provision of additional pedestrian paths including a north to south route via the eastern edge of the island
- b. provision of interpretation boards, way marking signs and bird watching hides
- c. management to improve the site's value for biodiversity
- d. a flood management strategy including appropriate practices including closures to the public during flood events
- e. a new car park off Huntingdon Road

Additionally, it is noted that at paragraph 9.91 of the Main Modifications document, the extension to Hinchingsbrooke Country Park is an important part of the overall strategy to provide strategic green infrastructure alongside development. The policy goes on to say that this extension would increase the size of the Country Park considerably and provide a strategic scale area of publicly accessible natural green space capable of serving a significant population in and around the Huntingdon Spatial Planning Area.

Whilst the Church Commissioners support a strategy to provide green infrastructure in the District, we remain of the view that further discussion is required with the Council on how the park will be delivered and the maintenance it will require.

We note that at paragraph 9.93 the reference to the land being farmed has been deleted. However, we can confirm the land within our client's ownership is farmed and is within a tenancy to a third party.

As stated in our previous response to an earlier stage of the emerging Local Plan, we would have welcomed more comprehensive discussions around the proposed allocation and we hope that should the allocation be found sound that the Council will enter into these discussions as soon as possible.

## Comment

Consultee	Janet Nuttall (34468)
Email Address	[REDACTED]
Company / Organisation	Natural England
Address	[REDACTED] [REDACTED] [REDACTED]
Event Name	Proposed Main Modifications 2018
Comment by	Natural England ( Janet Nuttall - 34468)
Comment ID	PMM2018:70
Response Date	29/01/19 15:51
Consultation Point	Proposed Main Modification 21 ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.3
Files	<a href="#">Nuttall for Natural England_Redacted.pdf</a>

Please tell us whether you support or object to this proposed main modification. Please note: **Support:** if you select support you will be stating that you think this proposed main modification is both **sound** and **legally compliant** . **Object:** if you select object you will be stating that you think this proposed main modification is either **unsound** and/ or is **not legally compliant** .

**Do you**  **Object**

It is important to understand how you think this proposed main modification is not sound. Please refer to the 'Proposed Submission Representations Advice Note' for more information about the options here. Please tick all that apply.

**Do you consider this proposed main modification is not sound because it is not...**

Please enter your representation here. You should say why you either support this proposed main modification or why you think it is not sound and/ or not legally compliant.

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**Please enter your representation here.**

MM21 – Natural England is disappointed with the amendment to Policy HU10 to significantly reduce the Hinchingsbrooke Country Park Extension area from 44ha to 27.5ha. We have provided further comments on this in response to the Habitats Regulations Assessment. However, we welcome the proposed provision of additional pedestrian paths, including a north to south route via the eastern edge of the island.

**Summary**

Natural England is disappointed with the amendment to Policy HU10 to significantly reduce the Hinchingsbrooke Country Park Extension area.

Family or Company Name: Urban & Civic  
Agent: David Lock Associates (Kimber, Tom)  
PMM: MM22

## Comment

**Agent** Tom Kimber (992838)  
**Email Address** [REDACTED]  
**Company / Organisation** David Lock Associates  
**Address** [REDACTED]  
**Consultee** Urban & Civic (992844)  
**Company / Organisation** Urban&Civic  
**Address** [REDACTED]  
**Event Name** Proposed Main Modifications 2018  
**Comment by** Urban&Civic ( Urban & Civic - 992844)  
**Comment ID** PMM2018:67  
**Response Date** 29/01/19 16:22  
**Consultation Point** Proposed Main Modification 22 ([View](#))  
**Status** Processed  
**Submission Type** Email  
**Version** 0.6  
**Files** [Kimber, David Lock for Urban](#)

Please tell us whether you support or object to this proposed main modification. Please note: **Support:** if you select support you will be stating that you think this proposed main modification is both **sound** and **legally compliant** . **Object:** if you select object you will be stating that you think this proposed main modification is either **unsound** and/ or is **not legally compliant** .

**Do you** Object

**Do you consider this proposed main modification to be sound?** Not Sound

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**Do you consider this proposed main modification is not sound because it is not...**

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**Please enter your representation here.**

These representations are submitted on behalf of Urban&Civic by David Lock Associates. Urban&Civic own 100% of Alconbury Weald and are development partners of Wintringham Park, St Neots East as well as being master developer for both sites. Urban&Civic therefore have a long-term interest in the successful delivery of growth within Huntingdonshire. Urban&Civic welcome the opportunity to provide representations on the proposed Main Modifications of the draft Huntingdonshire Local Plan 2018. Urban&Civic have taken an active interest in the evolution of the plan and have commented on previous stages and iterations of the Huntingdonshire Local Plan. This representation relates to Proposed Main Modification 15 and 25 in relation to Strategic Expansion Locations 1.1 and 2. The representation highlights potential soundness and practical difficulties with the imposition of a 'delivery cap' and the proposed modification that not all dwellings will be built by the end of the plan period taking account of the proximity of other nearby allocations. SEL2 St Neots East Proposed modification 22: 10.4a It is not anticipated that all of the proposed dwellings associated with this allocation will be built by the end of the plan period. When assessed against realistic rates of annual delivery, including taking into account the proximity of other nearby allocations, it is estimated that final completion of the site will be beyond 2036. This will be reviewed through the Council's annual housing trajectory. Given that the Strategic Expansion Location at St Neots East (SEL 2) consists of two sites (Wintringham Park and Land East of Loves Farm) it is unclear which other nearby allocations have been justified to have an impact upon delivery at St Neots East. As proposed by the Main Modifications, the other nearby allocations within the St Neots East Spatial Planning Area consist of the following: SN1 St Mary's Urban Village, St Neots: approximately 45 homes SN2 Loves Farm Reserved Site, St Neots: approximately 40 dwellings SN3: Cromwell Road North, St Neots: approx. 80 dwellings SN4: Cromwell Road Car Park, St Neots: approx. 20 dwellings SN5: Former Youth Centre, Priory Road, St Neots approx. 14 dwellings allocation to be deleted SN6: North of St James Road, Little Paxton: approx. 35 homes These relatively small-scale sites are not considered to materially impact upon delivery rates at SEL2. Furthermore, the current trajectories for the sites at both Wintringham Park and Land East of Loves Farm have anticipated completion dates in advance of the end of the plan period in 2035/36 (currently 2033/34 for Wintringham Park and 2027/28 for Loves Farm East). If it is accepted that delivery rates at these two sites will be slower than anticipated - as proposed by the modifications - there is still potential for these sites to be completed within the plan period. The proposed addition of text to review delivery through the Council's annual housing trajectory is supported. Similar to comments made above in relation to Alconbury Weald, there are likely to be practical consequences - which go to the heart of the effective deliverability of the site allocation - if the projected timescale is delayed in terms of meeting the Outline Planning Permission Condition (all reserved matters to be made within eighteen years at Wintringham Park) and potential for delayed projected timings for delivery of s106 obligations.

**Summary**

Object to Main Modification 22. The representation highlights potential soundness and practical difficulties with the imposition of a 'delivery cap' and the proposed modification that not all dwellings will be built by the end of the plan period taking account of the proximity of other nearby allocations. It is unclear which other nearby allocations have been justified to have an impact upon delivery at St Neots East. Relatively small-scale sites are not considered to materially impact upon delivery rates at

SEL2. The proposed addition of text to review delivery through the Council's annual housing trajectory is supported.

Family or Company Name: Conroy, Messrs M & N  
Agent: Brown & Co. (Pravin, Lydia)  
PMM: MM23

## Comment

**Agent** Lydia Pravin (1198346)  
**Email Address** [REDACTED]  
**Address** [REDACTED]  
**Consultee** Messrs M & N Conroy (1151536)  
**Address** [REDACTED]  
**Event Name** Proposed Main Modifications 2018  
**Comment by** Messrs M & N Conroy (1151536)  
**Comment ID** PMM2018:39  
**Response Date** 28/01/19 16:04  
**Consultation Point** Proposed Main Modification 23 ([View](#))  
**Status** Processed  
**Submission Type** Email  
**Version** 0.6  
**Files** [Pravin, Lydia for M](#)

Please tell us whether you support or object to this proposed main modification. Please note: **Support:** if you select support you will be stating that you think this proposed main modification is both **sound** and **legally compliant** . **Object:** if you select object you will be stating that you think this proposed main modification is either **unsound** and/ or is **not legally compliant** .

**Do you** Object

**Do you consider this proposed main modification to be sound?** Not Sound

It is important to understand how you think this proposed main modification is not sound. Please refer to the 'Proposed Submission Representations Advice Note' for more information about the options here. Please tick all that apply.

**Do you consider this proposed main modification is not sound because it is not...**

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**Please enter your representation here.**

A number of allocations are proposed to be deleted for flooding reasons. The deletion of these sites raises an issues of soundness given the concerns raised in Modification 1, which will reduce the housing delivery in Huntingdonshire. Therefore the Land at Green End, Great Stukeley is ready for immediate development as an appropriate option for allocation to compensate and ensure the Plan can be considered sound.

### **Supporting documents**

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Pravin, Lydia for M

Please tell us whether changes can be made to address the issue(s) you have identified.

**Can the issue(s) you have identified be addressed Yes  
by making changes to the proposed main  
modification?**

Please tell us what changes would address the issue(s) that you have identified.

You should say why these changes will make this proposed main modification sound and/ or legally compliant.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it ( **U** ) and identifying any text to be deleted by striking it through ( **ABC** ).

**What changes would address the issue(s) that you have identified?**

Include the Land at Green End, Great Stukeley as an allocation.

### **Summary**

Object to Main Modification 23. The deletion of allocations on the grounds of flooding reduces housing delivery in Huntingdonshire. Land at Green End, Great Stukeley is ready for immediate development as an appropriate option for allocation to compensate and ensure the Plan can be considered sound.

## Comment

**Consultee** Adam Ireland (775665)  
**Email Address** [REDACTED]  
**Company / Organisation** Environment Agency  
**Address** [REDACTED]  
**Event Name** Proposed Main Modifications 2018  
**Comment by** Environment Agency ( Adam Ireland - 775665)  
**Comment ID** PMM2018:24  
**Response Date** 23/01/19 15:32  
**Consultation Point** Proposed Main Modification 23 ([View](#))  
**Status** Processed  
**Submission Type** Web  
**Version** 0.4

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**Do you** Object

**Do you consider this proposed main modification to be sound?** Not Sound

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**Do you consider this proposed main modification is not sound because it is not...** . Positively prepared  
. Effective

Please say whether you think this proposed main modification is legally compliant. Please refer to the 'Proposed Submission Representations Advice Note' for more information about the issues covered by legal compliance.

**Do you consider this proposed main modification to be legally compliant?** Legally compliant

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**Please enter your representation here.**

The Environment Agency spoke at the examination session, and concluded that whilst the allocation is Flood Zone 3b, the allocation of the site is the most appropriate 'positive' way forward to ensure that the regeneration takes place in a sustainable way. In particular we supported the allocation because:

- The site is in clear need of regeneration, and there is ambition on behalf of the Council, land owner and Town Council to develop it.
- The site would not be regenerated by building elsewhere, so the area of search for the sequential test is arguably the site. As the council appears to agree with this, it is hard to see why it would fail a sequential test.(the main reason HDC wishes to omit the site)
- Deallocation removes an opportunity for the Council to apply the sequential approach to development within the site
- The local plan provides an opportunity to be clear about mitigation standards, and would enable any off-site floodplain compensation areas to come forward through s106, or an advance application for off-site mitigation.
- The local plan allocation is conditional on delivering features that retain the site's contribution to the public realm and amenity - in the form of a café, public open space and moorings. De-allocation would remove those key aspects of sustainability on the main and most prominent gateway to Godmanchester for visitors by foot, bike and boat.
- Without the allocation it may be difficult to insist on the Water Framework Directive related benefits of softening the river frontage for biodiversity, erosion/sediment management and public amenity
- Retention [replacement] of the moorings is essential to bring about the visitor draw to the site (both boaters and the public attracted to boats) that would give the café best chance of viability success, or else it could soon be lost to a change of use. The fall-back position of de-allocation is arguably worse: Hunts DC is still able to grant permission for redevelopment on the site if it is not allocated. However this would cause serious unintended consequences for HDC, for example: >it would set a serious precedent for further development in flood zone 3b in Hunts, which would be very difficult to justify, especially if they had de-allocated it on flood risk grounds, and there was no clear plan policy setting out the reasons and exceptional circumstances why the site should be redeveloped. >the site could have a private, sterile and unwelcoming theme if it came forward as residential only without amenity space and a reason to visit.

Please tell us whether changes can be made to address the issue(s) you have identified.

**Can the issue(s) you have identified be addressed by making changes to the proposed main modification?** Yes

Please tell us what changes would address the issue(s) that you have identified.

You should say why these changes will make this proposed main modification sound and/ or legally compliant.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it ( **U** ) and identifying any text to be deleted by striking it through ( **ABC** ).

**What changes would address the issue(s) that you have identified?**

Reinstate the allocation as it was.

**Summary**

Object to Main Modification 23. If developed outside of the Plan framework it would set a dangerous precedent for development in Flood Zone 3b and be developed to lesser standards. Allocation of the site allows for regeneration of the area contributing positively to the public realm and amenity and would provide suitable mitigation through S106. The area of search for the sequential test is arguably the site. De-allocation removes an opportunity for the Council to apply the sequential approach to development within the site Without the allocation it may be difficult to insist on the Water Framework Directive related benefits. Retention [replacement] of the moorings is essential to bring about the visitor draw and maintain site viability, or else it could soon be lost to a change of use.

## Comment

**Consultee** Ms Vicky Pryce (1197248)  
**Email Address** [REDACTED]  
**Address** [REDACTED]  
**Event Name** Proposed Main Modifications 2018  
**Comment by** Ms Vicky Pryce (1197248)  
**Comment ID** PMM2018:12  
**Response Date** 22/01/19 11:28  
**Consultation Point** Proposed Main Modification 23 ([View](#))  
**Status** Processed  
**Submission Type** Web  
**Version** 0.5

Please tell us whether you support or object to this proposed main modification. Please note: **Support:** if you select support you will be stating that you think this proposed main modification is both **sound** and **legally compliant** . **Object:** if you select object you will be stating that you think this proposed main modification is either **unsound** and/ or is **not legally compliant** .

**Do you** Object

**Do you consider this proposed main modification to be sound?** Not Sound

It is important to understand how you think this proposed main modification is not sound. Please refer to the 'Proposed Submission Representations Advice Note' for more information about the options here. Please tick all that apply.

**Do you consider this proposed main modification is not sound because it is not...** Effective

Please say whether you think this proposed main modification is legally compliant. Please refer to the 'Proposed Submission Representations Advice Note' for more information about the issues covered by legal compliance.

**Do you consider this proposed main modification to be legally compliant?** Legally compliant



Please enter your representation here. You should say why you either support this proposed main modification or why you think it is not sound and/ or not legally compliant.

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We object to the removal of this allocation. GMCTC supports mixed use redevelopment of this previously developed land, assuming appropriate mitigation can be taken against flood risk and adequate parking is provided on site. It is currently an eyesore with previously attractive old buildings falling into decay and needs improvement. As it is a prominent site forming a gateway to Godmanchester and Huntingdon, high quality design will be particularly important.

Please tell us whether changes can be made to address the issue(s) you have identified.

**Can the issue(s) you have identified be addressed by making changes to the proposed main modification?** Yes

Please tell us what changes would address the issue(s) that you have identified.

You should say why these changes will make this proposed main modification sound and/ or legally compliant.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it ( **U** ) and identifying any text to be deleted by striking it through ( **ABC** ).

**What changes would address the issue(s) that you have identified?**

Maintain the designation of the site for mixed development.

**Summary**

Object to Main Modification 23. The allocation should be retained for mixed use development provided appropriate mitigation against flood risk and parking is provided on site. The allocation is currently an eyesore.

Family or Company Name: Godmanchester Town Council  
(Pryce, Vicky)  
PMM: MM24

## Comment

Consultee	Ms Vicky Pryce (1197248)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Proposed Main Modifications 2018
Comment by	Ms Vicky Pryce (1197248)
Comment ID	PMM2018:21
Response Date	23/01/19 09:24
Consultation Point	Proposed Main Modification 24 ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.3

Please tell us whether you support or object to this proposed main modification. Please note: **Support:** if you select support you will be stating that you think this proposed main modification is both **sound** and **legally compliant** . **Object:** if you select object you will be stating that you think this proposed main modification is either **unsound** and/ or is **not legally compliant** .

**Do you** Support

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### **Do you consider this proposed main modification is not sound because it is not...**

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**Please enter your representation here.**

Noted

**Summary**

Support Main Modification 24.

Family or Company Name: Gladman Developments  
Agent: Hourigan, Marc  
PMM: MM25

## Comment

**Agent** Marc Hourigan (1198382)  
**Email Address** [REDACTED]  
**Address** [REDACTED]  
**Consultee** Gladman Developments (1118265)  
**Email Address** [REDACTED]  
**Company / Organisation** Gladman Developments  
**Address** [REDACTED]  
**Event Name** Proposed Main Modifications 2018  
**Comment by** Gladman Developments ( Gladman Developments - 1118265)  
**Comment ID** PMM2018:55  
**Response Date** 28/01/19 11:04  
**Consultation Point** Proposed Main Modification 25 ([View](#))  
**Status** Processed  
**Submission Type** Email  
**Version** 0.4  
**Files** [Hourigan for Gladman Developments.pdf](#)

Please tell us whether you support or object to this proposed main modification. Please note: **Support:** if you select support you will be stating that you think this proposed main modification is both **sound** and **legally compliant** . **Object:** if you select object you will be stating that you think this proposed main modification is either **unsound** and/ or is **not legally compliant** .

**Do you**  **Object**

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**Do you consider this proposed main modification is not sound because it is not...**

Please enter your representation here. You should say why you either support this proposed main modification or why you think it is not sound and/ or not legally compliant.

Please note: There are no limits on the length of representations but please be as concise as possible, including only that which is necessary to explain your representation. You can support your representation with supporting documents if you wish (see below) but please include clear references and reasoning as to why any attachments support your representation.

**Note: Any representations that rely entirely on supporting documents and state 'See attached report' or similar for this question will not be accepted.**

**Please enter your representation here.**

4.1 Whilst Gladman note that these modifications outline that the SEL's will not deliver in full within the Plan period and that some delivery will be beyond this it provides no further details within the Plan of the anticipated delivery rates for these key sites. Gladman recommend that the Council identify within the Plan the anticipated delivery from these sites within the plan period inline with the Inspectors recommendations. This will provide further clarity.

**Supporting documents**

If you would like you can support your representation with supporting documents. Please provide a description for any documents you upload and clearly reference them in your representation.

If you want to refer to a publication that is available elsewhere or that is subject to copyright that you do not control please provide a link to a website where it is available or give a full reference (including author(s), full title and date of publication) in your comment.

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[Hourigan for Gladman Developments.pdf](#)

Please tell us whether changes can be made to address the issue(s) you have identified.

**Can the issue(s) you have identified be addressed by making changes to the proposed main modification?** Yes

Please tell us what changes would address the issue(s) that you have identified.

You should say why these changes will make this proposed main modification sound and/ or legally compliant.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it ( **U** ) and identifying any text to be deleted by striking it through ( **ABC** ).

**What changes would address the issue(s) that you have identified?**

Gladman recommend that the Council identify within the Plan the anticipated delivery from these sites within the plan period inline with the Inspectors recommendations. This will provide further clarity.

**Summary**

Recommend anticipated delivery is identified within the plan.

Family or Company Name: Conroy, Messrs M & N  
Agent: Brown & Co. (Pravin, Lydia)  
PMM: MM27

## Comment

**Agent** Lydia Pravin (1198346)  
**Email Address** [REDACTED]  
**Address** [REDACTED]  
**Consultee** Messrs M & N Conroy (1151536)  
**Address** [REDACTED]  
**Event Name** Proposed Main Modifications 2018  
**Comment by** Messrs M & N Conroy (1151536)  
**Comment ID** PMM2018:40  
**Response Date** 28/01/19 16:05  
**Consultation Point** Proposed Main Modification 27 ([View](#))  
**Status** Processed  
**Submission Type** Email  
**Version** 0.6  
**Files** [Pravin, Lydia for M](#)

Please tell us whether you support or object to this proposed main modification. Please note: **Support:** if you select support you will be stating that you think this proposed main modification is both **sound** and **legally compliant** . **Object:** if you select object you will be stating that you think this proposed main modification is either **unsound** and/ or is **not legally compliant** .

**Do you** Object

**Do you consider this proposed main modification to be sound?** Not Sound

It is important to understand how you think this proposed main modification is not sound. Please refer to the 'Proposed Submission Representations Advice Note' for more information about the options here. Please tick all that apply.

**Do you consider this proposed main modification is not sound because it is not...**

Please enter your representation here. You should say why you either support this proposed main modification or why you think it is not sound and/ or not legally compliant.

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**Please enter your representation here.**

A number of allocations are proposed to be deleted for flooding reasons. The deletion of these sites raises an issues of soundness given the concerns raised in Modification 1, which will reduce the housing delivery in Huntingdonshire. Therefore the Land at Green End, Great Stukeley is ready for immediate development as an appropriate option for allocation to compensate and ensure the Plan can be considered sound.

### **Supporting documents**

If you would like you can support your representation with supporting documents. Please provide a description for any documents you upload and clearly reference them in your representation.

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Pravin, Lydia for M

Please tell us whether changes can be made to address the issue(s) you have identified.

**Can the issue(s) you have identified be addressed Yes by making changes to the proposed main modification?**

Please tell us what changes would address the issue(s) that you have identified.

You should say why these changes will make this proposed main modification sound and/ or legally compliant.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it ( **U** ) and identifying any text to be deleted by striking it through ( **ABC** ).

**What changes would address the issue(s) that you have identified?**

Include the Land at Green End, Great Stukeley as an allocation.

### **Summary**

Object to Main Modification 27. The deletion of allocations on the grounds of flooding reduces housing delivery in Huntingdonshire. Land at Green End, Great Stukeley is ready for immediate development as an appropriate option for allocation to compensate and ensure the Plan can be considered sound.

Family or Company Name: Homes England  
Agent: AECOM (Carlisle, David)  
PMM: MM28

## Comment

Agent	David Carlisle (1098957)
Email Address	[REDACTED]
Company / Organisation	AECOM
Address	[REDACTED] [REDACTED] [REDACTED]
Consultee	Claire Hupton (1095549)
Email Address	[REDACTED]
Company / Organisation	Homes Engalnd (formerly Homes and Communities Agency)
Address	* * *
Event Name	Proposed Main Modifications 2018
Comment by	Homes Engalnd (formerly Homes and Communities Agency) ( Claire Hupton - 1095549)
Comment ID	PMM2018:78
Response Date	29/01/19 14:28
Consultation Point	Proposed Main Modification 28 ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.3
Files	<a href="#">Carlisle, AECOM for Homes England.pdf</a>

Please tell us whether you support or object to this proposed main modification. Please note: **Support:** if you select support you will be stating that you think this proposed main modification is both **sound** and **legally compliant** . **Object:** if you select object you will be stating that you think this proposed main modification is either **unsound** and/ or is **not legally compliant** .

**Do you**  **Support**

It is important to understand how you think this proposed main modification is not sound. Please refer to the 'Proposed Submission Representations Advice Note' for more information about the options here. Please tick all that apply.



**Do you consider this proposed main modification is not sound because it is not...**

Please enter your representation here. You should say why you either support this proposed main modification or why you think it is not sound and/ or not legally compliant.

Please note: There are no limits on the length of representations but please be as concise as possible, including only that which is necessary to explain your representation. You can support your representation with supporting documents if you wish (see below) but please include clear references and reasoning as to why any attachments support your representation.

**Note: Any representations that rely entirely on supporting documents and state 'See attached report' or similar for this question will not be accepted.**

**Please enter your representation here.**

Proposed Main Modification reference number: MM28 Local Plan page: 205 Policy/paragraph: SI1 St Ives West paragraph 11.11 Homes England supports the removal of paragraph 11.1 from the supporting text, the deleted paragraph did not relate to any of the policy clauses within SI1. Policies LP22 and LP23 provide the policy framework for retail proposals outside of existing town centres.

**Supporting documents**

If you would like you can support your representation with supporting documents. Please provide a description for any documents you upload and clearly reference them in your representation.

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[Carlisle, AECOM for Homes England.pdf](#)

**Summary**

Support Main Modification 28 as the deleted paragraph did not relate to any of the policy clauses within SI1. Policies LP22 and LP23 provide the policy framework for retail proposals outside of existing town centres.

## Comment

Consultee	houghton (1198301)
Email Address	[REDACTED]
Company / Organisation	Houghton & Wyton Neighbourhood Plan
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Proposed Main Modifications 2018
Comment by	Houghton & Wyton Neighbourhood Plan ( houghton - 1198301)
Comment ID	PMM2018:56
Response Date	29/01/19 13:27
Consultation Point	Proposed Main Modification 28 ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.2
Files	<a href="#">MM28 Table showing inconsistency.docx</a>

Please tell us whether you support or object to this proposed main modification. Please note: **Support:** if you select support you will be stating that you think this proposed main modification is both **sound** and **legally compliant** . **Object:** if you select object you will be stating that you think this proposed main modification is either **unsound** and/ or is **not legally compliant** .

**Do you**  **Object**

**Do you consider this proposed main modification to be sound?**  **Sound**

It is important to understand how you think this proposed main modification is not sound. Please refer to the 'Proposed Submission Representations Advice Note' for more information about the options here. Please tick all that apply.

**Do you consider this proposed main modification is not sound because it is not...**

Please say whether you think this proposed main modification is legally compliant. Please refer to the 'Proposed Submission Representations Advice Note' for more information about the issues covered by legal compliance.

**Do you consider this proposed main modification Not legally compliant to be legally compliant?**

Please enter your representation here. You should say why you either support this proposed main modification or why you think it is not sound and/ or not legally compliant.

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**Note: Any representations that rely entirely on supporting documents and state 'See attached report' or similar for this question will not be accepted.**

**Please enter your representation here.**

We are concerned that the Sustainability Main Modifications Appraisal may contain references to a document quashed by the High Court in April 2013 and which therefore may lead to unlawful conclusions. There are 4 references to what is called an Urban Design Framework which the council have used when assessing impacts on SA6; SA8; SA16; and SA21. This Framework has been particularly important in the council answering the decision aiding questions and arriving at their answer, because it apparently contains solutions mitigating issues of transport, pedestrian and cycle access and safety, low carbon energy and the detrimental impacts upon significant visibility from the surrounding conservation area of any development on the site. These are the ones mentioned, but the UDF may have influenced HDC's decisions in other ways too. Following a thorough search we can find no link to the UDF document other than St.Ives west Urban design Framework (October 2011). However as the District Council is aware, following a successful challenge to the adoption by the Council of the St.Ives west UDF October 2011 (R (Houghton & Wyton Parish Council) v Huntingdonshire District Council [2013] EWHC 1476 (Admin)), the UDF was quashed. In the judgement, Charles Gore QC stated, at paragraph 56, that "(u)nless formally quashed, the [UDF] will be invoked, possibly by developers and/or third parties, as well as by the [Council], in respect of planning applications, both those within the study area and elsewhere [...] if unquashed the [UDF] will inevitably mislead". HDC have been made aware of this issue several times and the Parish Council have always reserved the right to take legal action should they feel the instructions of the court were not being followed. This issue was raised with Mr Kevin Ward from the Planning Inspectorate at the start of the Local Plan Hearing covering St.Ives west on 13th September 2018, hence we are surprised it has not been properly addressed by HDC. The issue is of course much larger than simply the comparison following the Main Modification 28 and the Final Sustainability Appraisal Report (CORE/07) plus HEELA 2017. Unfortunately the production of both of these consultations builds upon previous studies which were also heavily influenced by the UDF and we believe contain conscious and unconscious bias. To demonstrate, a simple exercise looking at the decisions of each of the criteria versus the commentary results in a very different picture. The SA poses what are potentially negative questions and correctly answered in the affirmative but rather than be classified 'orange -ve', they are somehow given a positive 'green +' score. For example, SA 1 Is more than half the site located on grade 3 agricultural land or lower (including urban and non-agricultural), Grade 2, or Grade 1? Answer = yes which should result in an orange negative answer rather than the green + it scores by HDC. (Other examples where we see inconsistency between HDC's commentary and the final classification are shown in a table attached). When scored accurately, the results paint a far less positive and more realistic picture for the land in question. Even with this, the latest SA has reaffirmed sustainability limitations, which coupled with the green field status, agricultural grade of land, plus flooding risk (lower slopes and topography making SUDS less suitable) reaffirms capacity limitations for the site. However, we believe the outcome would be far more limiting for development if the SA went further as it should do to look more fully at the impacts on the surrounding area, valued the land as an asset as a backdrop to the Great Ouse Valley and the economic impact to our local tourism and sustainability of the surrounding villages, plus protecting the separate identity of the neighbouring settlements. To this end we are surprised that given comments are been made in relation to the MMSA 28, which on the one hand bring some information up to date ,such as bus stops and greater exposure of the site, unfortunately there is still no reference to the Houghton & Wyton Neighbourhood Plan. Bearing in mind this was examined; made

in March 2018; and is planning policy adopted by HDC, it is therefore a material change to the previous study. This contains an anti coalescence policy HWNP 3, which describes and defines the gap together with considerable evidence and justification which is very relevant to the site. This policy was recommended by the Examiner from the May 2016 Submission of the Houghton & Wyton Neighbourhood Plan, to maintain the important distinction between the village and Market Town of St.Ives. Hence it is a major omission not even to be referenced, particularly in the new SA conclusions, given certain development might easily compromise the policy. It is particularly pertinent to the BBSRC field given its pivotal role in providing the gap and worthy of consideration as it influences both capacity and densities on the site. Quite correctly, the role of the gap is not new and has been seen as an important consideration in previous strategic Housing and Land assessments. It was considered so vitally important in the SHLAA of 2008 and which provided the evidence base for the current Core Strategy 2009, that it concluded the BBSRC field was not suitable for housing development. Yet as we say, gets no mention now. These points have been raised before, but alas we do not know how much consideration has been given to them. However, we do feel they are sufficient to warrant that if the St.Ives West UDF (October 2011) has been used in this SA, it is not based on legal judgement. Likewise, to make this consultation meaningful and valid, if HDC have produced and are using a different St.Ives west UDF then it needs to have been produced properly and published so that we and others can see it. Given its importance in the conclusions drawn and decisions made in the SA then it should also have had a link to it as per the Final Sustainability Appraisal Report (CORE/07) and HEELA 2017. It is noted that people did ask to see this document when making comments during the previous consultation ( ref: Houghton & Wyton Parish Council comments) but we are not aware of anything being supplied. We have submitted a Freedom Of Information request to see the document, but sadly this has not materialised before the close of this consultation. You will have gathered that we care a great deal about where we live and are keen to engage and make a positive contribution to the plan making process by offering local knowledge. However as it stands without seeing this document we do not feel, or indeed even know whether we have had the chance to make the comments we need to make from a local perspective as part of this consultation.

### **Supporting documents**

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[MM28 Table showing inconsistency.docx](#)

Please tell us whether changes can be made to address the issue(s) you have identified.

### **Can the issue(s) you have identified be addressed by making changes to the proposed main modification?** Yes

Please tell us what changes would address the issue(s) that you have identified.

You should say why these changes will make this proposed main modification sound and/ or legally compliant.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it ( **U** ) and identifying any text to be deleted by striking it through ( **ABC** ).

### **What changes would address the issue(s) that you have identified?**

UDF needs to be published and consulted

If the UDF relates to the quashed UDF this needs to be removed

Making the final SA scoring consistent with the written conclusions

## **Summary**

Object to Main Modification 28. Further assessment of the Sustainability Appraisal is needed to justify housing site allocation. There are 4 references to an Urban Design Framework used to assess the impacts on SA6; SA8; SA16; and SA21 and address mitigation measures. There is no link to this document and the UDF was quashed following a successful challenge to the adoption by the Council of the St.Ives west UDF October 2011 (R (Houghton & Wyton Parish Council) v Huntingdonshire District Council [2013] EWHC 1476 (Admin)). There is no reference to the Neighbourhood Plan and the anti coalescence policy which the BBSRC field plays an important role in. There are inconsistencies in the scoring of Sustainability Appraisal objectives 1, 5, 6, 9, 10, 12, 18, 19 and 21

**Table showing inconsistency comparing HDC commentary with resultant scoring of St.Ives west Main Modifications Sustainability Appraisal.**

<b>SA 1</b> Is more than half the site located on grade 3 agricultural land or lower (including urban and non-agricultural), Grade 2, or Grade 1?	Answer = yes orange, but HDC score it green +.
<b>SA5</b> Is the site a designated nature site, immediately adjacent to a designated nature site or within 2km of a Ramsar, SAC or SPA, 1km of a SSSI or NNR or 200m of a CWS?	Answer = Yes Orange (HDC's commentary), but score it blue neutral.
<b>SA 5</b> Are protected species known to exist on the site or is there potential for protected species to exist on the site?	Answer = Yes Orange (HDC's commentary) but score it blue neutral.
<b>SA6</b> Will development have a significant impact on the surrounding townscape or landscape?	Answer = Yes (HDC suggest this could be significant) but classify as blue neutral, due to urban design framework which we have not seen.
<b>SA9</b> Is the site outside or adjacent to an air quality management area?	Answer = yes. HDC scores positive, yet mention traffic impacts and are well aware of complaints regards pollution from over capacity of A1123 and queuing traffic on Houghton Hill.
<b>SA 10</b> Is the site located in such a position that development is unlikely to cause widespread light, noise or other forms of pollution?	Answer = Yes (HDC's commentary) but classify blue neutral.
<b>SA 12</b> Is the site within 500m of an existing area of open space?	Answer = no (HDC's commentary) but scored green positive because HDC state that there will be open land provided to the south of the site. This is very specific and presumably once again comes from the urban design framework which must specify exactly how the land will be developed – much like A Development Plan Document DPD would do.
<b>SA 18</b> Is the site within 2km of a major concentration of employment opportunities and/or potential employees?	Answer = about half the site, therefore suggests neutral, but HDC classify as green positive.
<b>SA 19</b> Will the site provide opportunities for investment to create additional jobs?	Answer = No because with removal of shop only very limited (home working and community facilities) but HDC classify as blue neutral.
<b>SA21</b> Will the site support a mix of uses such as housing, employment, retail and/or community facilities?	Answer = No because with removal of the shop there will be very limited mix use (residential and limited community facilities only) but HDC classify as green positive.

--	--

## Comment

<b>Consultee</b>	Miss Lois Dale (836660)
<b>Email Address</b>	[REDACTED]
<b>Company / Organisation</b>	Houghton & Wyton Parish Council
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Proposed Main Modifications 2018
<b>Comment by</b>	Houghton & Wyton Parish Council (Miss Lois Dale - 836660)
<b>Comment ID</b>	PMM2018:33
<b>Response Date</b>	28/01/19 14:06
<b>Consultation Point</b>	Proposed Main Modification 28 ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.4

Please tell us whether you support or object to this proposed main modification. Please note: **Support:** if you select support you will be stating that you think this proposed main modification is both **sound** and **legally compliant** . **Object:** if you select object you will be stating that you think this proposed main modification is either **unsound** and/ or is **not legally compliant** .

**Do you**  **Object**

**Do you consider this proposed main modification to be sound?**  **Sound**

It is important to understand how you think this proposed main modification is not sound. Please refer to the 'Proposed Submission Representations Advice Note' for more information about the options here. Please tick all that apply.

**Do you consider this proposed main modification is not sound because it is not...**

Please say whether you think this proposed main modification is legally compliant. Please refer to the 'Proposed Submission Representations Advice Note' for more information about the issues covered by legal compliance.



**Do you consider this proposed main modification to be legally compliant?** Not legally compliant

Please enter your representation here. You should say why you either support this proposed main modification or why you think it is not sound and/ or not legally compliant.

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**Note: Any representations that rely entirely on supporting documents and state 'See attached report' or similar for this question will not be accepted.**

**Please enter your representation here.**

MM28 - Removal of retail space within LP St.Ives west Whilst we support the removal of the retail space requirement we have concerns about this policy and want to assure that there is further assessment of the Sustainability Appraisal to justify housing site allocation. We are concerned that the Sustainability Main Modifications Appraisal may contain references to a document quashed by the High Court in April 2013 and which therefore may lead to unlawful conclusions. There are 4 references to what is called an Urban Design Framework which the council have used when assessing impacts on SA6; SA8; SA16; and SA21. This Framework has been particularly important in the council answering the decision aiding questions and arriving at their answer, because it apparently contains solutions mitigating issues of transport, pedestrian and cycle access and safety, low carbon energy and the detrimental impacts upon significant visibility from the surrounding conservation area of any development on the site. These are the ones mentioned, but the UDF may have influenced HDC's decisions in other ways too. Following a thorough search we can find no link to the UDF document other than St.Ives west Urban design Framework (October 2011). However as the District Council is aware, following a successful challenge to the adoption by the Council of the St.Ives west UDF October 2011 (R (Houghton & Wyton Parish Council) v Huntingdonshire District Council [2013] EWHC 1476 (Admin)), the UDF was quashed. In the judgement, Charles Gore QC stated, at paragraph 56, that "(u)nless formally quashed, the [UDF] will be invoked, possibly by developers and/or third parties, as well as by the [Council], in respect of planning applications, both those within the study area and elsewhere [...] if unquashed the [UDF] will inevitably mislead". HDC have been made aware of this issue several times and the Parish Council have always reserved the right to take legal action should they feel the instructions of the court were not being followed. This issue was raised with Mr Kevin Ward from the Planning Inspectorate at the start of the Local Plan Hearing covering St.Ives west on 13th September 2018, hence we are surprised it has not been properly addressed by HDC. The issue is of course much larger than simply the comparison following the Main Modification 28 and the Final Sustainability Appraisal Report (CORE/07) plus HELAA 2017. Unfortunately the production of both of these consultations built upon previous studies which were also heavily influenced by the UDF and we believe contain conscious and unconscious bias. To demonstrate, a simple exercise looking at the decisions of each of the criteria versus the commentary results in a very different picture. The SA poses what are potentially negative questions and correctly answered in the affirmative but rather than be classified 'orange -ve', they are somehow given a positive 'green +' score. These are shown in a table at the end of this comment. Scored accurately, the results paint a far less positive and more realistic picture for the land in question. Even with this, the latest SA has reaffirmed sustainability limitations, which coupled with the green field status, agricultural grade of land, plus flooding risk (lower slopes and topography making SUDS less suitable) reaffirms capacity limitations for the site. However, we believe the outcome would be far more limiting for development if the SA went further as it should do to look more fully at the impacts on the surrounding area, valued the land as an asset and the economic impact to our local tourism and sustainability of the surrounding villages, plus protecting the separate identity of the neighbouring settlements. We are surprised that comments that have been made in relation to the MMSA 28, which on the one hand bring some information up to date regards the bus stops and greater exposure of the site, but which still make NO REFERENCE TO THE NEIGHBOURHOOD PLAN. Bearing in mind this was examined, made in March 2018 and is planning policy adopted by HDC it is therefore a material change to the previous study. This contains an ANTI COALESCENCE POLICY HWNP 3, which describes and defines the gap together with considerable evidence and justification which is very relevant to the site. THIS POLICY WAS RECOMMENDED BY THE EXAMINER of the May 2016 Submission of the Houghton & Wyton Neighbourhood Plan TO

MAINTAIN THE IMPORTANT DISTINCTION BETWEEN THE VILLAGE AND MARKET TOWN OF ST IVES AND HENCE IS A MAJOR OMISSION NOT EVEN TO BE REFERENCED, particularly in the new SA conclusion if this might be compromised by development. It is particularly pertinent to the BBSRC field given its pivotal role in providing the gap and worthy of consideration as it influences both capacity and densities on the site. The role of the gap is not new and has been seen as an important consideration in previous strategic Housing and Land assessments. It was considered so vitally important in the SHLAA of 2008 and which provided the evidence base for the current Core Strategy 2009, that it concluded the BBSRC field was not suitable for development. Yet as we say, gets no mention now. These points have been raised before, but alas we do not know how much consideration has been given to them. However, we do feel they are sufficient to warrant that if the St.Ives west UDF (October 2011) has been used in this SA, it is not based on sound or legal judgement. If HDC have produced and are using a different St.Ives west UDF where is this? And where is the evidence of due process and consultations leading to its adoption? It is noted that people did ask to see this document when making comments during the previous consultation (Houghton & Wyton Parish Council) but we are not aware of anything being supplied. Table showing inconsistency comparing HDC commentary with resultant scoring of St.Ives west Main Modifications Sustainability Appraisal. SA 1 Is more than half the site located on grade 3 agricultural land or lower (including urban and non-agricultural), Grade 2, or Grade 1? Answer = yes orange, but HDC score it green +. SA5 Is the site a designated nature site, immediately adjacent to a designated nature site or within 2km of a Ramsar, SAC or SPA, 1km of a SSSI or NNR or 200m of a CWS? Answer = Yes Orange (HDC's commentary), but score it blue neutral. SA 5 Are protected species known to exist on the site or is there potential for protected species to exist on the site? Answer = Yes Orange (HDC's commentary) but score it blue neutral. SA6 Will development have a significant impact on the surrounding townscape or landscape? Answer = Yes (HDC suggest this could be significant) but classify as blue neutral, due to urban design framework which we have not seen. SA9 Is the site outside or adjacent to an air quality management area? Answer = yes. HDC scores positive, yet mention traffic impacts and are well aware of complaints regards pollution from over capacity of A1123 and queuing traffic on Houghton Hill. SA 10 Is the site located in such a position that development is unlikely to cause widespread light, noise or other forms of pollution? Answer = Yes (HDC's commentary) but classify blue neutral. SA 12 Is the site within 500m of an existing area of open space? Answer = no (HDC's commentary) but scored green positive because HDC state that there will be open land provided to the south of the site. This is very specific and presumably once again comes from the urban design framework which must specify exactly how the land will be developed – much like A Development Plan Document DPD would do. SA 18 Is the site within 2km of a major concentration of employment opportunities and/or potential employees? Answer = about half the site, therefore suggests neutral, but HDC classify as green positive. SA 19 Will the site provide opportunities for investment to create additional jobs? Answer = No because with removal of shop only very limited (home working and community facilities) but HDC classify as blue neutral. SA21 Will the site support a mix of uses such as housing, employment, retail and/or community facilities? Answer = No because with removal of the shop there will be very limited mix use (residential and limited community facilities only) but HDC classify as green positive.

Please tell us whether changes can be made to address the issue(s) you have identified.

**Can the issue(s) you have identified be addressed by making changes to the proposed main modification?** No

### Summary

Object to Main Modification 28. Support the removal of the retail space requirement. Further assessment of the Sustainability Appraisal is needed to justify housing site allocation. There are 4 references to an Urban Design Framework used to assess the impacts on SA6; SA8; SA16; and SA21 and address mitigation measures. There is no link to this document and the UDF was quashed following a successful challenge to the adoption by the Council of the St.Ives west UDF October 2011 (R (Houghton & Wyton Parish Council) v Huntingdonshire District Council [2013] EWHC 1476 (Admin)). There is no reference to the Neighbourhood Plan and the anti coalescence policy which the BBSRC field plays an important role in. There are inconsistencies in the scoring of Sustainability Appraisal objectives 1, 5, 6, 9, 10, 12, 18, 19 and 21

## Comment

**Agent** Lydia Pravin (1198346)  
**Email Address** [REDACTED]  
**Address** [REDACTED]  
**Consultee** Messrs M & N Conroy (1151536)  
**Address** [REDACTED]  
**Event Name** Proposed Main Modifications 2018  
**Comment by** Messrs M & N Conroy (1151536)  
**Comment ID** PMM2018:41  
**Response Date** 28/01/19 16:07  
**Consultation Point** Proposed Main Modification 29 ([View](#))  
**Status** Processed  
**Submission Type** Email  
**Version** 0.5  
**Files** [Pravin, Lydia for M](#)

Please tell us whether you support or object to this proposed main modification. Please note: **Support:** if you select support you will be stating that you think this proposed main modification is both **sound** and **legally compliant** . **Object:** if you select object you will be stating that you think this proposed main modification is either **unsound** and/ or is **not legally compliant** .

**Do you** Object

**Do you consider this proposed main modification to be sound?** Not Sound

It is important to understand how you think this proposed main modification is not sound. Please refer to the 'Proposed Submission Representations Advice Note' for more information about the options here. Please tick all that apply.

**Do you consider this proposed main modification is not sound because it is not...**

Please enter your representation here. You should say why you either support this proposed main modification or why you think it is not sound and/ or not legally compliant.

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**Note: Any representations that rely entirely on supporting documents and state 'See attached report' or similar for this question will not be accepted.**

**Please enter your representation here.**

A number of allocations are proposed to be deleted for flooding reasons. The deletion of these sites raises an issues of soundness given the concerns raised in Modification 1, which will reduce the housing delivery in Huntingdonshire. Therefore the Land at Green End, Great Stukeley is ready for immediate development as an appropriate option for allocation to compensate and ensure the Plan can be considered sound.

### **Supporting documents**

If you would like you can support your representation with supporting documents. Please provide a description for any documents you upload and clearly reference them in your representation.

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Pravin, Lydia for M

Please tell us whether changes can be made to address the issue(s) you have identified.

**Can the issue(s) you have identified be addressed Yes by making changes to the proposed main modification?**

Please tell us what changes would address the issue(s) that you have identified.

You should say why these changes will make this proposed main modification sound and/ or legally compliant.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it ( **U** ) and identifying any text to be deleted by striking it through ( **ABC** ).

**What changes would address the issue(s) that you have identified?**

Include the Land at Green End, Great Stukeley as an allocation.

### **Summary**

Object to Main Modification 29. The deletion of allocations on the grounds of flooding reduces housing delivery in Huntingdonshire. Land at Green End, Great Stukeley is ready for immediate development as an appropriate option for allocation to compensate and ensure the Plan can be considered sound.

Family or Company Name: Homes England  
Agent: AECOM (Carlisle, David)  
PMM: MM29

## Comment

Agent	David Carlisle (1098957)
Email Address	[REDACTED]
Company / Organisation	AECOM
Address	[REDACTED] [REDACTED] [REDACTED]
Consultee	Claire Hupton (1095549)
Email Address	[REDACTED]
Company / Organisation	Homes Engalnd (formerly Homes and Communities Agency)
Address	* * *
Event Name	Proposed Main Modifications 2018
Comment by	Homes Engalnd (formerly Homes and Communities Agency) ( Claire Hupton - 1095549)
Comment ID	PMM2018:79
Response Date	29/01/19 14:28
Consultation Point	Proposed Main Modification 29 ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.5
Files	<a href="#">Carlisle, AECOM for Homes England.pdf</a>

Please tell us whether you support or object to this proposed main modification. Please note: **Support:** if you select support you will be stating that you think this proposed main modification is both **sound** and **legally compliant** . **Object:** if you select object you will be stating that you think this proposed main modification is either **unsound** and/ or is **not legally compliant** .

**Do you**  **Object**

It is important to understand how you think this proposed main modification is not sound. Please refer to the 'Proposed Submission Representations Advice Note' for more information about the options here. Please tick all that apply.

**Do you consider this proposed main modification is not sound because it is not...**

Please enter your representation here. You should say why you either support this proposed main modification or why you think it is not sound and/ or not legally compliant.

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**Please enter your representation here.**

Proposed Main Modification reference number: MM29; and MM5 Local Plan page: 209 – 210; and page 49. Policy/paragraph: SI4 Former Car Showroom and paragraphs 11.20 to 11.28; and Figure 2 Key Diagram. The removal of allocation SI4 (Former Car Showroom) from the Local Plan (MM29) leaves the St Ives SPA with only two recognised residential allocations in which to deliver circa 150 dwellings. The modification would result in an overall reduction of 50 units for the St Ives SPA to 430 units. The related modifications to Figure 2: Key Diagram (MM5) illustrate that proportionally the St Ives SPA is contributing very few new homes in comparison to the other SPAs and in light of the services available within the settlement. In this respect, Homes England disagrees with the conclusion of the 'Proposed Main Modifications 2018 Sustainability Appraisal' ('the SA') which does not explicitly address this 50 unit reduction in relation to the wider SPA and development strategy (p4): "No change to the SA findings." However, the SA did find when assessing the removal of SI4 in isolation (MM29) that: "The removal of the allocation reduces the certainty of housing provision within St Ives". Following the removal SI4 (Former Car Showroom), the Field site (SI 1) is St Ives principal allocation for major new housing growth. The SA reaffirms that (p87): 'This area [SI1] offers a sustainable opportunity for growing St Ives together with providing additional green infrastructure'. Of the approximately 400 new homes allocated in SI 1 (St Ives West), planning permission is in place for 281 dwellings that make up the wider allocation. As such the Field site is the only available allocated parcel in the SPA that can make a meaningful contribution to meeting the District's housing needs over the coming plan period and is available now. The other much smaller allocation (SI 2) is contingent on alternative improved provision of pitches, whereas Homes England's land does not carry any such constraints or dependencies. This greater reliance on SI1, as a consequence of SI4's removal, intensifies the issues raised previously in Homes England's representations and hearing statements - namely the embargo on development placed on the entire eastern extent of the Field site. Homes England's view is that this makes the plan less effective and more inflexible. The only options available to make the plan more effective at this stage of the examination would be to: (1) improve the clarity of SI1's supporting text and diagram; and (2) maintain St Ives SPA housing target at 480 units as submitted (with the 50 units from SI4 to be delivered on SI1). Critically, the illustrative diagram that accompanies policy SI1 should either be deleted or altered (see overleaf) via minor modifications. Homes England's landscape appraisal and preliminary masterplanning exercise demonstrates that the site could comfortably provide for the 50 units lost as a result of SI4's removal and still remain in conformity with the Development Plan. It is noted that it is outside the Inspector's remit to identify, or recommend changes to the Local Plan Policies Maps (namely the Proposals Map and Map 5). However, it is within the Inspector's gift (via the Inspector's Report) and Huntingdonshire District Council's ('HDC') remit (via the proposal of minor modifications) to help ensure the Development Plan remains internally consistent and provides clear guidance to both applicants and decision makers. The SI1 illustrative diagram predetermines the masterplanning exercise required under SI1 (clause a) and LP14, making the plan internally inconsistent. With the removal of SI4 it is even more important that SI1 is not unnecessarily hampered by onerous supporting text or the current depiction of the illustrative diagram. Extant policy within the Houghton Wyton Neighbourhood Plan (Policy HWNP 3: Anti – Coalescence) in combination with SI1 (clause g) provides the statutory framework for informing future applications and the development management process for this site. In the submitted Statement of Consultation (see p109-110 and p455-457), in respect of the Field Site, HDC state: 'detailed landscape negotiations' and 'further community involvement' are required. This flexibility is not reflected in policy SI 1's supporting text at present. In addition, the Local Plan was not amended following the detailed analysis provided by the Houghton and Wyton Neighbourhood Plan examiners. The two examiners both proposed modifications

that removed references to a strategic gap on the Field Site and both resisted wording and maps that would place an 'embargo' on development for the Field Site. Yet the submitted SI 1 illustrative diagram does place an embargo on the eastern side of the site without any statutory policy hooks and contrary to the landscape evidence and SI (clause g) – this is unjustified. How the plan can be made sound and the precise changes/wording that is being sought MM5 should be altered and maintain the St Ives SPA housing target as 480 units (as submitted). The use of the word 'approximately' under SI1 (1) allows sufficient flexibility for the allocation to help achieve this plan period SPA target. The plan would also benefit from minor modifications that would afford Homes England the flexibility to continue to explore development options for the most optimal use of the site, in compliance with the provisions of SI 1, LP2, LP11-LP14 and extant policy contained within the Houghton and Wyton Neighbourhood Plan (Policy HWNP3 Anti –coalescence). This will ensure the physical and visual separation of the Field Site and The Spires whilst still delivering much needed housing in St Ives. Placing an embargo on a large swathe of Homes England's landholding is not justified by the evidence (for the detailed reasons set out in our earlier Regulation 19 representations and Matter 8 Hearing Statement). Amending the illustrative diagram to provide greater flexibility would improve the effectiveness of the plan. The following minor modifications to the supporting text are also recommended: 11.4 ...The indicative illustration below summarises detailed urban design work setting out how development of the area could take place. Detailed scheme designs shall be established via a masterplan and public consultation in accordance with policies SI 1 and LP 14. 11.9 ... A substantial band of greenspace should be retained through the portion of the BBSRC field to the eastern of the derelict buildings extent of the Field site and up to the western edge of residential development at 'The Spires'... Finally, the illustrative diagram should be amended as follows (see overleaf – an enlarged 'New residential development' is proposed in compliance with SI1 clause g): Figure 1 SI 1 Proposed amendment to Illustrated Diagram

## Supporting documents

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[Carlisle, AECOM for Homes England.pdf](#)

Please tell us whether changes can be made to address the issue(s) you have identified.

**Can the issue(s) you have identified be addressed by making changes to the proposed main modification?** Yes

Please tell us what changes would address the issue(s) that you have identified.

You should say why these changes will make this proposed main modification sound and/ or legally compliant.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it ( **U** ) and identifying any text to be deleted by striking it through ( **ABC** ).

**What changes would address the issue(s) that you have identified?**

Include modifications to SI1:

Amend the illustrative diagram to provide greater flexibility would improve the effectiveness of the plan.

The following minor modifications to the supporting text are also recommended:

11.4 ...The indicative illustration ~~below~~ summarises ~~detailed urban design work setting out~~ how development of the area could take place. Detailed scheme designs shall be established via a masterplan and public consultation in accordance with policies SI 1 and LP 14.

11.9 ... A ~~substantial~~ band of greenspace should be retained through the portion of the BBSRC field ~~to the eastern of the derelict buildings~~ extent of the Field site and up to the western edge of residential development at 'The Spires'...

## Summary

Object to Main Modification 29. The removal of allocation S14 (Former Car Showroom) from the Local Plan (MM29) leaves the St Ives SPA with only two recognised residential allocations. The modification would result in an overall reduction of 50 units for the St Ives SPA to 430 units. This greater reliance on S11, as a consequence of S14's removal, intensifies the issues raised previously in Homes England's representations and hearing statements - namely the embargo on development placed on the entire eastern extent of the Field site. Homes England's view is that this makes the plan less effective and more inflexible. Modifications should be made to S11 to address these issues.



## Comment

Consultee	Mr James Croucher (1045618)
Email Address	[REDACTED]
Company / Organisation	Lochailort Investments Ltd
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Proposed Main Modifications 2018
Comment by	Lochailort Investments Ltd (Mr James Croucher - 1045618)
Comment ID	PMM2018:23
Response Date	23/01/19 15:27
Consultation Point	Proposed Main Modification 29 ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.6
Files	<a href="#">Murketts MM29 drainage strategy calculations.pdf</a> <a href="#">Murketts MM 29 Sequential test.pdf</a> <a href="#">Murketts MM29 drainage strategy.pdf</a> <a href="#">Murketts MM29 flood risk assessment.pdf</a> <a href="#">Murketts MM29 site specific flood assessment.pdf</a> <a href="#">Murketts Local Plan Main Mods reps 220119.pdf</a>

Please tell us whether you support or object to this proposed main modification. Please note: **Support:** if you select support you will be stating that you think this proposed main modification is both **sound** and **legally compliant** . **Object:** if you select object you will be stating that you think this proposed main modification is either **unsound** and/ or is **not legally compliant** .

Do you  Support  Object

Do you consider this proposed main modification to be sound?  Yes  Not Sound

It is important to understand how you think this proposed main modification is not sound. Please refer to the 'Proposed Submission Representations Advice Note' for more information about the options here. Please tick all that apply.

### **Do you consider this proposed main modification is not sound because it is not...**

Please enter your representation here. You should say why you either support this proposed main modification or why you think it is not sound and/ or not legally compliant.

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### **Please enter your representation here.**

We do not accept that the deletion of site allocation SI4 (Former Car Showroom, London Road, St Ives) is necessary to make the plan sound and consequently, we object to proposed main modification 29. Flood risk The Environment Agency has constructed modern flood defences which protect a large part of St Ives from flooding, including site SI4. These newly-built defences have been robustly constructed to modern standards and are maintained by the Environment Agency. Consequently, site SI4 should be considered to be in Flood Zone 1, where neither the sequential nor the exception test applies. Having correctly adopted this floor risk classification, the public benefits of the site's regeneration manifestly weigh in substantial favour of its allocation for residential redevelopment. This is a contaminated brownfield site which has lain derelict for ten years, causing harm to the character and appearance of the Conservation Area. Both the current and the previous owners have been approached on several occasions asking whether the site can come forward for redevelopment. Given the unusual site-specific demolition and remediation costs, as well as the constraints posed by the high and medium pressure gas mains crossing the site (which preclude any larger-footprint development), the only viable reuse is for residential development. No other site would realise the substantial public benefits of the site's regeneration and consequently, should the Local Authority consider that the Sequential Test ought to be applied, this is clearly met. We would cite planning permission 18/02239/FUL (Former ATS garage, 22 East Street, St Ives) as a local example of where similar regeneration benefits in a flood-defended location were such that the Sequential Test was met. The Local Planning Authority's correct assessment of the Sequential Test applies equally to site allocation SI4 as it did to the East Street site. In terms of the Exception Test, the enclosed Flood Risk Assessment and separate Drainage Strategy documents have been submitted in support of recent planning application reference 18/02726/FUL on the SI4 site. Both documents have been prepared following extensive liaison with the Environment Agency, who have confirmed (as attached) that both the methodology and the adopted strategy are appropriate. Consequently, the Local Planning Authority can also be confident that the Exception Test has been passed at site SI4. Summary There is no justification or requirement for site allocation SI4 to be deleted in order to make the Plan sound. To the contrary, the public benefits of the site's regeneration for residential development – the only practical and viable reuse – weigh heavily in favour of the site's continued allocation. The enclosed detailed Flood Risk Assessment and Drainage Strategy documents were not before the Inspector when he recommended that site allocation SI4 be deleted, and neither had planning application 18/02726/FUL been submitted. In light of this additional information, the Local Planning Authority is clearly at full liberty to set aside the Inspector's proposed main modification in respect of site allocation SI4, and reinstate the allocation accordingly. We would request this course of action.

### **Supporting documents**

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Murketts MM29 site specific flood assessment.pdf

Please tell us whether changes can be made to address the issue(s) you have identified.

**Can the issue(s) you have identified be addressed by making changes to the proposed main modification?** Yes

Please tell us what changes would address the issue(s) that you have identified.

You should say why these changes will make this proposed main modification sound and/ or legally compliant.


It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it ( **U** ) and identifying any text to be deleted by striking it through ( **ABC** ).

**What changes would address the issue(s) that you have identified?**

Reinstate proposed allocation SI4 following consideration of the attached detailed flood risk assessment and drainage strategy documents not previously presented.

**Summary**

Object to Main Modification 29. There is no justification or requirement for site allocation SI4 to be deleted in order to make the Plan sound. To the contrary, the public benefits of the site's regeneration for residential development – the only practical and viable reuse – weigh heavily in favour of the site's continued allocation. The enclosed detailed Flood Risk Assessment and Drainage Strategy documents were not before the Inspector when he recommended that site allocation SI4 be deleted, and neither had planning application 18/02726/FUL been submitted. In light of this additional information, the Local Planning Authority is clearly at full liberty to set aside the Inspector's proposed main modification in respect of site allocation SI4, and reinstate the allocation accordingly. We would request this course of action.

MLM		Page 1
North Kiln Felaw Maltings 46 Felaw Street Ipswich IP2 8PN	618862 Former Murketts Garage SW Network	
Date 14/12/18 File 618862-ZZ-XX-CA-C-SW-000...	Designed by CB Checked by JRC	
XP Solutions	Network 2017.1.2	

STORM SEWER DESIGN by the Modified Rational Method

Design Criteria for Storm

Pipe Sizes STANDARD Manhole Sizes STANDARD

FEH Rainfall Model	
Return Period (years)	100
FEH Rainfall Version	1999
Site Location GB 531400 270500 TL 31400 70500	
C (1km)	-0.027
D1 (1km)	0.330
D2 (1km)	0.256
D3 (1km)	0.264
E (1km)	0.319
F (1km)	2.416
Maximum Rainfall (mm/hr)	0
Maximum Time of Concentration (mins)	30
Foul Sewage (l/s/ha)	0.000
Volumetric Runoff Coeff.	0.750
PIMP (%)	100
Add Flow / Climate Change (%)	0
Minimum Backdrop Height (m)	0.000
Maximum Backdrop Height (m)	0.000
Min Design Depth for Optimisation (m)	1.200
Min Vel for Auto Design only (m/s)	1.00
Min Slope for Optimisation (1:X)	500

Designed with Level Soffits

Time Area Diagram for Storm at outfall S (pipe S1.004)

Time (mins)	Area (ha)	Time (mins)	Area (ha)
0-4	0.286	4-8	0.100


Total Area Contributing (ha) = 0.386

Total Pipe Volume (m<sup>3</sup>) = 17.543

Time Area Diagram at outfall S (pipe S5.004)

Time (mins)	Area (ha)	Time (mins)	Area (ha)
0-4	0.255	4-8	0.055











Total Area Contributing (ha) = 0.310

MLM		Page 2
North Kiln Felaw Maltings 46 Felaw Street Ipswich IP2 8PN	618862 Former Murketts Garage SW Network	
Date 14/12/18 File 618862-ZZ-XX-CA-C-SW-000...	Designed by CB Checked by JRC	
XP Solutions	Network 2017.1.2	

Time Area Diagram at outfall S (pipe S5.004)


Total Pipe Volume (m³) = 14.393

Network Design Table for Storm







PN	Length (m)	Fall (m)	Slope (1:X)	I.Area (ha)	T.E. (mins)	Base Flow (l/s)	k (mm)	HYD SECT	DIA (mm)	Section Type	Auto Design
S1.000	11.039	0.200	55.2	0.034	3.00	0.0	0.600	o	300	Pipe/Conduit	
S1.001	24.284	0.555	43.8	0.046	0.00	0.0	0.600	o	300	Pipe/Conduit	
S1.002	24.284	0.065	375.0	0.045	0.00	0.0	0.600	o	375	Pipe/Conduit	
S2.000	36.569	0.918	39.8	0.153	3.00	0.0	0.600	o	300	Pipe/Conduit	
S3.000	13.394	0.045	300.0	0.029	3.00	0.0	0.600	o	300	Pipe/Conduit	
S2.001	17.451	0.058	300.0	0.016	0.00	0.0	0.600	o	300	Pipe/Conduit	
S4.000	15.087	0.427	35.3	0.013	3.00	0.0	0.600	o	150	Pipe/Conduit	
S2.002	53.932	0.144	375.0	0.045	0.00	0.0	0.600	o	375	Pipe/Conduit	
S1.003	11.134	0.030	375.0	0.005	0.00	0.0	0.600	o	375	Pipe/Conduit	
S1.004	8.283	0.055	150.0	0.000	0.00	0.0	0.600	o	150	Pipe/Conduit	

Network Results Table

PN	Rain (mm/hr)	T.C. (mins)	US/IL (m)	Σ I.Area (ha)	Σ Base Flow (l/s)	Foul (l/s)	Add Flow (l/s)	Vel (m/s)	Cap (l/s)	Flow (l/s)
S1.000	0.00	3.09	5.300	0.034	0.0	0.0	0.0	2.12	149.9	0.0
S1.001	0.00	3.26	5.100	0.080	0.0	0.0	0.0	2.38	168.5	0.0
S1.002	0.00	3.69	4.470	0.125	0.0	0.0	0.0	0.93	102.7	0.0
S2.000	0.00	3.24	5.600	0.153	0.0	0.0	0.0	2.50	176.6	0.0
S3.000	0.00	3.25	4.727	0.029	0.0	0.0	0.0	0.90	63.8	0.0
S2.001	0.00	3.57	4.682	0.198	0.0	0.0	0.0	0.90	63.8	0.0
S4.000	0.00	3.15	5.200	0.013	0.0	0.0	0.0	1.70	30.0	0.0
S2.002	0.00	4.54	4.548	0.256	0.0	0.0	0.0	0.93	102.7	0.0
S1.003	0.00	4.74	4.404	0.386	0.0	0.0	0.0	0.93	102.7	0.0
S1.004	0.00	4.90	4.374	0.386	0.0	0.0	0.0	0.82	14.5	0.0

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Network Design Table for Storm

PN	Length (m)	Fall (m)	Slope (1:X)	I.Area (ha)	T.E. (mins)	Base Flow (l/s)	k (mm)	HYD SECT	DIA (mm)	Section	Type	Auto Design
S5.000	25.170	0.067	375.0	0.113	3.00	0.0	0.600	o	375	Pipe/Conduit		
S5.001	37.558	0.100	375.0	0.085	0.00	0.0	0.600	o	375	Pipe/Conduit		
S6.000	16.750	0.056	300.0	0.049	3.00	0.0	0.600	o	300	Pipe/Conduit		
S5.002	25.247	0.695	36.3	0.036	0.00	0.0	0.600	o	450	Pipe/Conduit		
S5.003	13.492	0.030	450.0	0.027	0.00	0.0	0.600	o	450	Pipe/Conduit		
S5.004	6.794	0.045	150.0	0.000	0.00	0.0	0.600	o	150	Pipe/Conduit		

Network Results Table


PN	Rain (mm/hr)	T.C. (mins)	US/IL (m)	I.Area (ha)	Base Flow (l/s)	Foul (l/s)	Add Flow (l/s)	Vel (m/s)	Cap (l/s)	Flow (l/s)
S5.000	0.00	3.45	5.567	0.113	0.0	0.0	0.0	0.93	102.7	0.0
S5.001	0.00	4.12	5.500	0.198	0.0	0.0	0.0	0.93	102.7	0.0
S6.000	0.00	3.31	5.531	0.049	0.0	0.0	0.0	0.90	63.8	0.0
S5.002	0.00	4.25	5.325	0.283	0.0	0.0	0.0	3.38	537.9	0.0
S5.003	0.00	4.49	4.630	0.310	0.0	0.0	0.0	0.95	151.4	0.0
S5.004	0.00	4.62	4.600	0.310	0.0	0.0	0.0	0.82	14.5	0.0

Free Flowing Outfall Details for Storm

Outfall Pipe Number	Outfall Name	C. Level (m)	I. Level (m)	Min I. Level (m)	D,L (mm)	W (mm)
S1.004	S	6.380	4.319	0.000	0	0

Free Flowing Outfall Details for Storm

Outfall Pipe Number	Outfall Name	C. Level (m)	I. Level (m)	Min I. Level (m)	D,L (mm)	W (mm)
S5.004	S	6.200	4.554	0.000	0	0

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Simulation Criteria for Storm

Volumetric Runoff Coeff	0.750	Additional Flow - % of Total Flow	0.000
Areal Reduction Factor	1.000	MADD Factor * 10m <sup>3</sup> /ha Storage	2.000
Hot Start (mins)	0	Inlet Coefficient	0.800
Hot Start Level (mm)	0	Flow per Person per Day (l/per/day)	0.000
Manhole Headloss Coeff (Global)	0.500	Run Time (mins)	60
Foul Sewage per hectare (l/s)	0.000	Output Interval (mins)	1

Number of Input Hydrographs 0    Number of Offline Controls 1    Number of Time/Area Diagrams 0  
Number of Online Controls 2    Number of Storage Structures 3    Number of Real Time Controls 0

Synthetic Rainfall Details

Rainfall Model	FEH
Return Period (years)	100
FEH Rainfall Version	1999
Site Location	GB 531400 270500 TL 31400 70500
C (1km)	-0.027
D1 (1km)	0.330
D2 (1km)	0.256
D3 (1km)	0.264
E (1km)	0.319
F (1km)	2.416
Summer Storms	Yes
Winter Storms	Yes
Cv (Summer)	0.750
Cv (Winter)	0.840
Storm Duration (mins)	30

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Online Controls for Storm

Complex Manhole: S9, DS/PN: S1.004, Volume (m³): 4.0

Hydro-Brake® Optimum

Unit Reference MD-SHE-0065-1500-0500-1500  
 Design Head (m) 0.500  
 Design Flow (l/s) 1.5  
 Flush-Flo™ Calculated  
 Objective Minimise upstream storage  
 Application Surface  
 Sump Available Yes  
 Diameter (mm) 65  
 Invert Level (m) 4.374  
 Minimum Outlet Pipe Diameter (mm) 100  
 Suggested Manhole Diameter (mm) 1200

Control Points	Head (m)	Flow (l/s)	Control Points	Head (m)	Flow (l/s)
Design Point (Calculated)	0.500	1.5	Kick-Flo®	0.336	1.3
Flush-Flo™	0.147	1.5	Mean Flow over Head Range	-	1.3


The hydrological calculations have been based on the Head/Discharge relationship for the Hydro-Brake® Optimum as specified. Should another type of control device other than a Hydro-Brake Optimum® be utilised then these storage routing calculations will be invalidated

Depth (m)	Flow (l/s)	Depth (m)	Flow (l/s)	Depth (m)	Flow (l/s)	Depth (m)	Flow (l/s)
0.100	1.5	1.200	2.2	3.000	3.4	7.000	5.1
0.200	1.5	1.400	2.4	3.500	3.7	7.500	5.3
0.300	1.4	1.600	2.5	4.000	3.9	8.000	5.4
0.400	1.4	1.800	2.7	4.500	4.1	8.500	5.6
0.500	1.5	2.000	2.8	5.000	4.3	9.000	5.8
0.600	1.6	2.200	2.9	5.500	4.5	9.500	5.9
0.800	1.9	2.400	3.1	6.000	4.7		
1.000	2.0	2.600	3.2	6.500	4.9		

Hydro-Brake® Optimum

Unit Reference MD-SHE-0092-4000-1200-4000  
 Design Head (m) 1.200  
 Design Flow (l/s) 4.0  
 Flush-Flo™ Calculated  
 Objective Minimise upstream storage  
 Application Surface  
 Sump Available Yes



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Hydro-Brake® Optimum

Diameter (mm) 92  
 Invert Level (m) 5.074  
 Minimum Outlet Pipe Diameter (mm) 150  
 Suggested Manhole Diameter (mm) 1200

Control Points	Head (m)	Flow (l/s)	Control Points	Head (m)	Flow (l/s)
Design Point (Calculated)	1.200	4.0	Kick-Flo®	0.743	3.2
Flush-Flo™	0.359	4.0	Mean Flow over Head Range	-	3.5


The hydrological calculations have been based on the Head/Discharge relationship for the Hydro-Brake® Optimum as specified. Should another type of control device other than a Hydro-Brake Optimum® be utilised then these storage routing calculations will be invalidated

Depth (m)	Flow (l/s)	Depth (m)	Flow (l/s)	Depth (m)	Flow (l/s)	Depth (m)	Flow (l/s)
0.100	2.9	1.200	4.0	3.000	6.1	7.000	9.1
0.200	3.8	1.400	4.3	3.500	6.6	7.500	9.4
0.300	4.0	1.600	4.6	4.000	7.0	8.000	9.7
0.400	4.0	1.800	4.8	4.500	7.4	8.500	10.0
0.500	3.9	2.000	5.1	5.000	7.8	9.000	10.3
0.600	3.8	2.200	5.3	5.500	8.2	9.500	10.6
0.800	3.3	2.400	5.5	6.000	8.5		
1.000	3.7	2.600	5.7	6.500	8.8		

Pump Manhole: S16, DS/PN: S5.004, Volume (m³): 4.2

Invert Level (m) 4.600

Depth (m)	Flow (l/s)	Depth (m)	Flow (l/s)
0.001	0.0000	2.000	0.0000


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Offline Controls for Storm

Pump Manhole: S16, DS/PN: S5.004, Loop to PN: S1.000

Invert Level (m) 4.600

Depth (m)	Flow (l/s)	Depth (m)	Flow (l/s)
0.001	2.0000	2.000	2.0000

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Storage Structures for Storm

Cellular Storage Manhole: S3, DS/PN: S1.002

Invert Level (m) 4.470 Safety Factor 2.0  
 Infiltration Coefficient Base (m/hr) 0.00000 Porosity 0.95  
 Infiltration Coefficient Side (m/hr) 0.00000

Depth (m)	Area (m <sup>2</sup> )	Inf. Area (m <sup>2</sup> )	Depth (m)	Area (m <sup>2</sup> )	Inf. Area (m <sup>2</sup> )
0.000	140.0	0.0	1.201	0.0	0.0
1.200	140.0	0.0			

Cellular Storage Manhole: S18, DS/PN: S3.000


Invert Level (m) 4.727 Safety Factor 2.0  
 Infiltration Coefficient Base (m/hr) 0.00000 Porosity 0.95  
 Infiltration Coefficient Side (m/hr) 0.00000

Depth (m)	Area (m <sup>2</sup> )	Inf. Area (m <sup>2</sup> )	Depth (m)	Area (m <sup>2</sup> )	Inf. Area (m <sup>2</sup> )
0.000	180.0	0.0	0.801	0.0	0.0
0.800	180.0	0.0			

Cellular Storage Manhole: S16, DS/PN: S5.004

Invert Level (m) 4.600 Safety Factor 2.0  
 Infiltration Coefficient Base (m/hr) 0.00000 Porosity 0.95  
 Infiltration Coefficient Side (m/hr) 0.00000

Depth (m)	Area (m <sup>2</sup> )	Inf. Area (m <sup>2</sup> )	Depth (m)	Area (m <sup>2</sup> )	Inf. Area (m <sup>2</sup> )
0.000	300.0	0.0	0.801	0.0	0.0
0.800	300.0	0.0			

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1 year Return Period Summary of Critical Results by Maximum Level (Rank 1) for Storm

Simulation Criteria

Areal Reduction Factor 1.000    Additional Flow - % of Total Flow 0.000  
Hot Start (mins) 0    MADD Factor \* 10m³/ha Storage 2.000  
Hot Start Level (mm) 0    Inlet Coeffiecient 0.800  
Manhole Headloss Coeff (Global) 0.500    Flow per Person per Day (l/per/day) 0.000  
Foul Sewage per hectare (l/s) 0.000

Number of Input Hydrographs 0    Number of Offline Controls 1    Number of Time/Area Diagrams 0  
Number of Online Controls 2    Number of Storage Structures 3    Number of Real Time Controls 0


Synthetic Rainfall Details

Rainfall Model FEH  
FEH Rainfall Version 1999  
Site Location GB 531400 270500 TL 31400 70500  
C (1km) -0.027  
D1 (1km) 0.330  
D2 (1km) 0.256  
D3 (1km) 0.264  
E (1km) 0.319  
F (1km) 2.416  
Cv (Summer) 0.750  
Cv (Winter) 0.840

Margin for Flood Risk Warning (mm) 150.0  
Analysis Timestep 2.5 Second Increment (Extended)  
DTS Status OFF  
DVD Status ON  
Inertia Status ON


Profile(s) Summer and Winter  
Duration(s) (mins) 60, 120, 240, 360, 480, 960, 1440  
Return Period(s) (years) 1, 30, 100  
Climate Change (%) 0, 0, 40

PN	US/MH Name	Storm	Return Period	Climate Change	First (X) Surcharge	First (Y) Flood	First (Z) Overflow	Overflow Act.	Water Level (m)
S1.000	S6	60 Summer	1	+0%					5.340
S1.001	S7	60 Summer	1	+0%	100/240 Winter				5.145
S1.002	S3	960 Winter	1	+0%	1/480 Winter				4.867
S2.000	S16	60 Summer	1	+0%					5.656
S3.000	S18	960 Winter	1	+0%	30/240 Winter				4.866
S2.001	S14	960 Winter	1	+0%	30/60 Summer				4.866
S4.000	S20	60 Summer	1	+0%	100/120 Winter				5.219

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1 year Return Period Summary of Critical Results by Maximum Level (Rank 1) for Storm


PN	US/MH Name	Surcharged		Flooded		Pipe Flow (l/s)	Status	Level Exceeded
		Depth (m)	Volume (m <sup>3</sup> )	Flow / Cap.	Overflow (l/s)			
S1.000	S6	-0.260	0.000	0.04		4.9	OK	
S1.001	S7	-0.255	0.000	0.05		8.2	OK	
S1.002	S3	0.022	0.000	0.03		2.5	SURCHARGED	
S2.000	S16	-0.244	0.000	0.08		12.9	OK	
S3.000	S18	-0.161	0.000	0.02		1.3	OK	
S2.001	S14	-0.116	0.000	0.03		1.8	OK	
S4.000	S20	-0.131	0.000	0.04		1.1	OK	

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1 year Return Period Summary of Critical Results by Maximum Level (Rank 1) for Storm

PN	US/MH Name	Storm	Return Period	Climate Change	First (X) Surcharge	First (Y) Flood	First (Z) Overflow	Overflow Act.	Water Level (m)
S2.002	S15	960 Winter	1	+0%	30/60 Summer				4.866
S1.003	S8	960 Winter	1	+0%	1/240 Summer				4.866
S1.004	S9	960 Winter	1	+0%	1/60 Summer				4.866
S5.000	S13	60 Summer	1	+0%					5.656
S5.001	S14	60 Summer	1	+0%					5.602
S6.000	S15	60 Summer	1	+0%					5.585
S5.002	S15	60 Summer	1	+0%					5.388
S5.003	S16	60 Summer	1	+0%	100/60 Summer				4.785
S5.004	S16	120 Winter	1	+0%	30/60 Summer		1/60 Summer	42	4.681

PN	US/MH Name	Surcharged		Flooded		Pipe		Status	Level Exceeded
		Depth (m)	Volume (m³)	Flow / Cap. (l/s)	Overflow (l/s)	Flow (l/s)			
S2.002	S15	-0.057	0.000	0.02		2.3		OK	
S1.003	S8	0.087	0.000	0.02		1.6		SURCHARGED	
S1.004	S9	0.341	0.000	0.12		1.5		SURCHARGED	
S5.000	S13	-0.286	0.000	0.11		9.3		OK	
S5.001	S14	-0.273	0.000	0.17		15.4		OK	
S6.000	S15	-0.246	0.000	0.08		4.1		OK	
S5.002	S15	-0.387	0.000	0.05		21.9		OK	
S5.003	S16	-0.295	0.000	0.26		23.9		OK	
S5.004	S16	-0.069	0.000	0.00	2.0	0.0		OK	

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30 year Return Period Summary of Critical Results by Maximum Level (Rank 1)  
for Storm

Simulation Criteria

Areal Reduction Factor 1.000    Additional Flow - % of Total Flow 0.000  
Hot Start (mins) 0    MADD Factor \* 10m<sup>3</sup>/ha Storage 2.000  
Hot Start Level (mm) 0    Inlet Coeffiecient 0.800  
Manhole Headloss Coeff (Global) 0.500    Flow per Person per Day (1/per/day) 0.000  
Foul Sewage per hectare (1/s) 0.000

Number of Input Hydrographs 0    Number of Offline Controls 1    Number of Time/Area Diagrams 0  
Number of Online Controls 2    Number of Storage Structures 3    Number of Real Time Controls 0


Synthetic Rainfall Details

Rainfall Model FEH  
FEH Rainfall Version 1999  
Site Location GB 531400 270500 TL 31400 70500  
C (1km) -0.027  
D1 (1km) 0.330  
D2 (1km) 0.256  
D3 (1km) 0.264  
E (1km) 0.319  
F (1km) 2.416  
Cv (Summer) 0.750  
Cv (Winter) 0.840

Margin for Flood Risk Warning (mm) 150.0  
Analysis Timestep 2.5 Second Increment (Extended)  
DTS Status OFF  
DVD Status ON  
Inertia Status ON

Profile(s) Summer and Winter  
Duration(s) (mins) 60, 120, 240, 360, 480, 960, 1440  
Return Period(s) (years) 1, 30, 100  
Climate Change (%) 0, 0, 40


PN	US/MH Name	Storm	Return Period	Climate Change	First (X) Surcharge	First (Y) Flood	First (Z) Overflow	Overflow Act.	Water Level (m)
S1.000	S6	60 Summer	30	+0%					5.361
S1.001	S7	60 Summer	30	+0%	100/240 Winter				5.175
S1.002	S3	960 Winter	30	+0%	1/480 Winter				5.155
S2.000	S16	60 Summer	30	+0%					5.698
S3.000	S18	960 Winter	30	+0%	30/240 Winter				5.144
S2.001	S14	1440 Winter	30	+0%	30/60 Summer				5.183
S4.000	S20	60 Summer	30	+0%	100/120 Winter				5.234

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30 year Return Period Summary of Critical Results by Maximum Level (Rank 1)  
for Storm

PN	US/MH Name	Surcharged		Flooded		Pipe Flow (l/s)	Status	Level Exceeded
		Depth (m)	Volume (m <sup>3</sup> )	Flow / Cap.	Overflow (l/s)			
S1.000	S6	-0.239	0.000	0.09		10.4	OK	
S1.001	S7	-0.225	0.000	0.14		21.5	OK	
S1.002	S3	0.310	0.000	0.10		9.3	SURCHARGED	
S2.000	S16	-0.202	0.000	0.23		38.0	OK	
S3.000	S18	0.117	0.000	0.19		9.8	SURCHARGED	
S2.001	S14	0.201	0.000	0.09		5.0	SURCHARGED	
S4.000	S20	-0.116	0.000	0.12		3.2	OK	




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30 year Return Period Summary of Critical Results by Maximum Level (Rank 1)  
for Storm

PN	US/MH Name	Storm	Return Period	Climate Change	First (X) Surcharge	First (Y) Flood	First (Z) Overflow	Overflow Act.	Water Level (m)
S2.002	S15	1440 Winter	30	+0%	30/60 Summer				5.194
S1.003	S8	960 Winter	30	+0%	1/240 Summer				5.190
S1.004	S9	1440 Winter	30	+0%	1/60 Summer				5.194
S5.000	S13	60 Summer	30	+0%					5.736
S5.001	S14	60 Summer	30	+0%					5.691
S6.000	S15	60 Summer	30	+0%					5.627
S5.002	S15	60 Summer	30	+0%					5.440
S5.003	S16	60 Summer	30	+0%	100/60 Summer				4.935
S5.004	S16	240 Winter	30	+0%	30/60 Summer		1/60 Summer	42	4.913

PN	US/MH Name	Surcharged		Flooded	Pipe		Status	Level Exceeded
		Depth (m)	Volume (m <sup>3</sup> )	Flow / Cap.	Flow / Overflow (l/s)	Flow (l/s)		
S2.002	S15	0.271	0.000	0.03		2.9	SURCHARGED	
S1.003	S8	0.411	0.000	0.10		6.7	SURCHARGED	
S1.004	S9	0.669	0.000	0.31		3.9	SURCHARGED	
S5.000	S13	-0.206	0.000	0.31		27.6	OK	
S5.001	S14	-0.184	0.000	0.51		47.3	OK	
S6.000	S15	-0.204	0.000	0.22		12.2	OK	
S5.002	S15	-0.334	0.000	0.15		67.5	OK	
S5.003	S16	-0.145	0.000	0.79		73.1	OK	
S5.004	S16	0.163	0.000	0.00	2.0	0.0	SURCHARGED	

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100 year Return Period Summary of Critical Results by Maximum Level (Rank 1)  
for Storm

Simulation Criteria

Areal Reduction Factor 1.000    Additional Flow - % of Total Flow 0.000  
Hot Start (mins) 0    MADD Factor \* 10m<sup>3</sup>/ha Storage 2.000  
Hot Start Level (mm) 0    Inlet Coeffiecient 0.800  
Manhole Headloss Coeff (Global) 0.500    Flow per Person per Day (1/per/day) 0.000  
Foul Sewage per hectare (1/s) 0.000

Number of Input Hydrographs 0    Number of Offline Controls 1    Number of Time/Area Diagrams 0  
Number of Online Controls 2    Number of Storage Structures 3    Number of Real Time Controls 0


Synthetic Rainfall Details

Rainfall Model FEH  
FEH Rainfall Version 1999  
Site Location GB 531400 270500 TL 31400 70500  
C (1km) -0.027  
D1 (1km) 0.330  
D2 (1km) 0.256  
D3 (1km) 0.264  
E (1km) 0.319  
F (1km) 2.416  
Cv (Summer) 0.750  
Cv (Winter) 0.840

Margin for Flood Risk Warning (mm) 150.0  
Analysis Timestep 2.5 Second Increment (Extended)  
DTS Status OFF  
DVD Status ON  
Inertia Status ON


Profile(s) Summer and Winter  
Duration(s) (mins) 60, 120, 240, 360, 480, 960, 1440  
Return Period(s) (years) 1, 30, 100  
Climate Change (%) 0, 0, 40

PN	US/MH Name	Storm	Return Period	Climate Change	First (X) Surcharge	First (Y) Flood	First (Z) Overflow	Overflow Act.	Water Level (m)
S1.000	S6	960 Winter	100	+40%					5.528
S1.001	S7	960 Winter	100	+40%	100/240 Winter				5.526
S1.002	S3	960 Winter	100	+40%	1/480 Winter				5.523
S2.000	S16	60 Summer	100	+40%					5.747
S3.000	S18	960 Winter	100	+40%	30/240 Winter				5.488
S2.001	S14	960 Winter	100	+40%	30/60 Summer				5.559
S4.000	S20	960 Winter	100	+40%	100/120 Winter				5.559

MLM		Page 16
North Kiln Felaw Maltings 46 Felaw Street Ipswich IP2 8PN	618862 Former Murketts Garage SW Network	
Date 14/12/18 File 618862-ZZ-XX-CA-C-SW-000...	Designed by CB Checked by JRC	
XP Solutions	Network 2017.1.2	

100 year Return Period Summary of Critical Results by Maximum Level (Rank 1)  
for Storm

PN	US/MH Name	Surcharged		Flooded		Pipe Flow (l/s)	Status	Level Exceeded
		Depth (m)	Volume (m <sup>3</sup> )	Flow / Cap.	Overflow (l/s)			
S1.000	S6	-0.072	0.000	0.03		3.5	OK	
S1.001	S7	0.126	0.000	0.04		5.8	SURCHARGED	
S1.002	S3	0.678	0.000	0.17		14.7	SURCHARGED	
S2.000	S16	-0.153	0.000	0.48		78.4	OK	
S3.000	S18	0.461	0.000	0.28		14.7	SURCHARGED	
S2.001	S14	0.577	0.000	0.12		6.5	SURCHARGED	
S4.000	S20	0.209	0.000	0.15		4.3	SURCHARGED	

MLM		Page 17
North Kiln Felaw Maltings 46 Felaw Street Ipswich IP2 8PN	618862 Former Murketts Garage SW Network	
Date 14/12/18 File 618862-ZZ-XX-CA-C-SW-000...	Designed by CB Checked by JRC	
XP Solutions	Network 2017.1.2	

100 year Return Period Summary of Critical Results by Maximum Level (Rank 1)  
for Storm

PN	US/MH Name	Storm	Return Period	Climate Change	First (X) Surcharge	First (Y) Flood	First (Z) Overflow	Overflow Act.	Water Level (m)
S2.002	S15	960 Winter	100	+40%	30/60 Summer				5.588
S1.003	S8	960 Winter	100	+40%	1/240 Summer				5.603
S1.004	S9	960 Winter	100	+40%	1/60 Summer				5.612
S5.000	S13	60 Summer	100	+40%					5.907
S5.001	S14	60 Summer	100	+40%					5.845
S6.000	S15	60 Summer	100	+40%					5.674
S5.002	S15	60 Summer	100	+40%					5.492
S5.003	S16	480 Winter	100	+40%	100/60 Summer				5.334
S5.004	S16	480 Winter	100	+40%	30/60 Summer		1/60 Summer	42	5.333

PN	US/MH Name	Surcharged		Flooded		Pipe		Level Exceeded
		Depth (m)	Volume (m³)	Flow / Cap. (l/s)	Overflow (l/s)	Flow (l/s)	Status	
S2.002	S15	0.665	0.000	0.05		5.2	SURCHARGED	
S1.003	S8	0.824	0.000	0.18		12.8	SURCHARGED	
S1.004	S9	1.088	0.000	0.48		6.1	SURCHARGED	
S5.000	S13	-0.035	0.000	0.62		55.4	OK	
S5.001	S14	-0.030	0.000	1.00		92.7	OK	
S6.000	S15	-0.157	0.000	0.46		25.1	OK	
S5.002	S15	-0.282	0.000	0.30		134.2	OK	
S5.003	S16	0.254	0.000	0.25		23.3	SURCHARGED	
S5.004	S16	0.584	0.000	0.00	2.0	0.0	SURCHARGED	

# 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

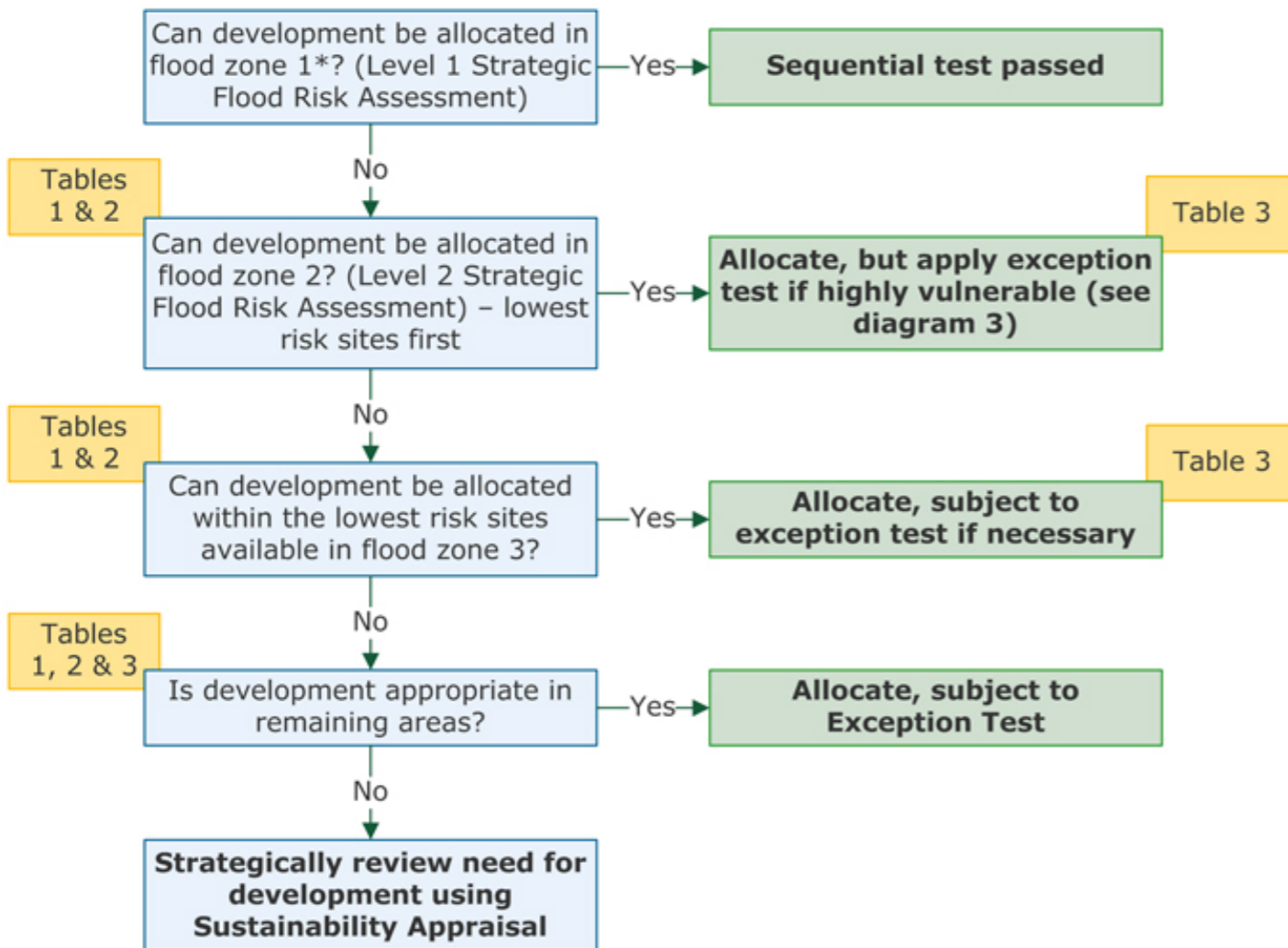
2.1 National Planning Practice Guidance (PPG) sets out requirements for the sequential and exception tests for flood risk as follows:

### 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:

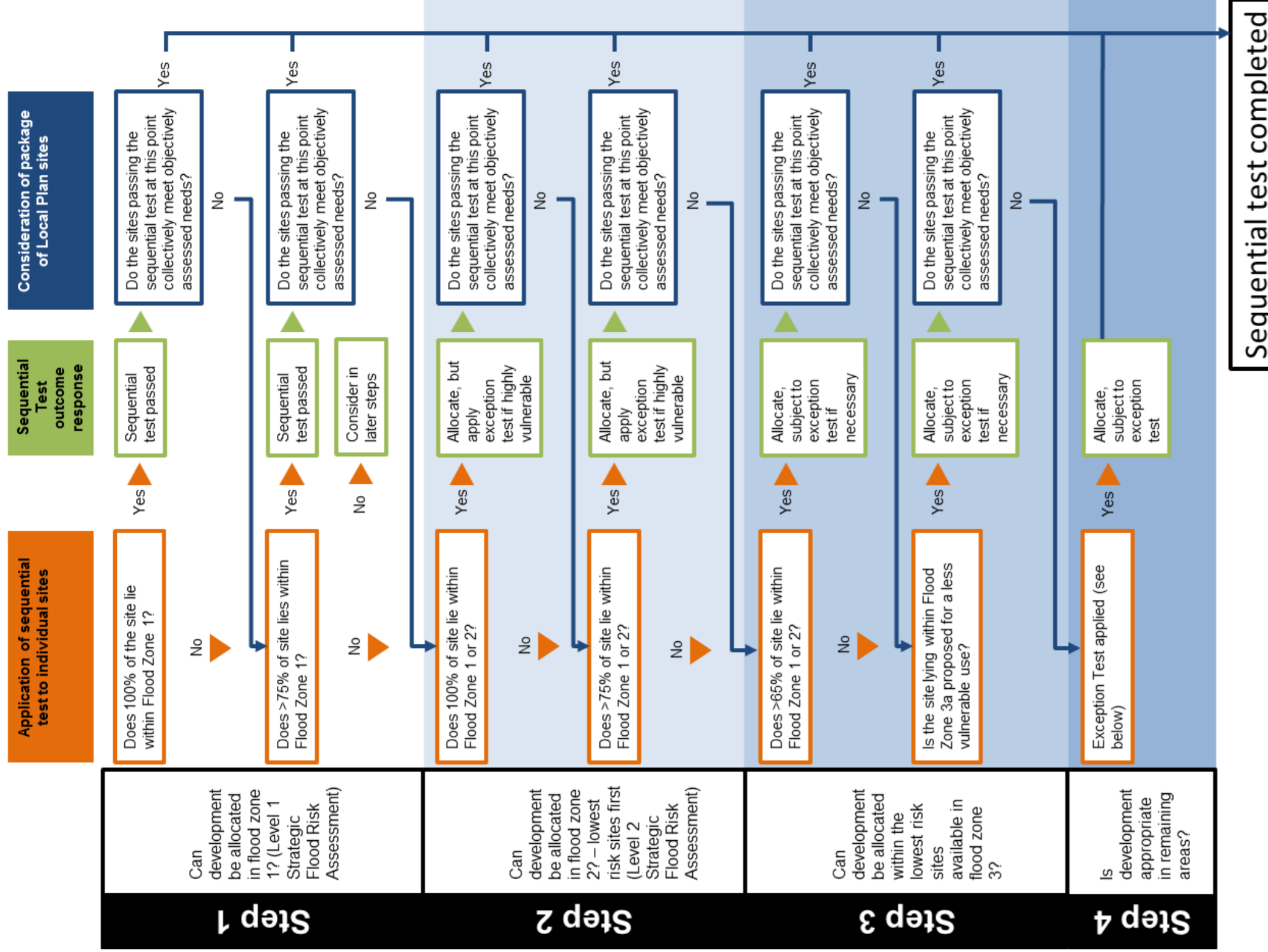
Type of development	Number of sites tested	Vulnerability classification
Mixed (including residential)	15	More vulnerable
Residential	49	More vulnerable
Employment	12	Less vulnerable
Retail	1	Less vulnerable
Leisure	1	Less vulnerable
Amenity open space, nature conservation and biodiversity, outdoor sports 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

## 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
Bearcroft 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
Bearcroft 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)

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

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



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)

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

## >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>

## >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)

## 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>	
	<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 been supplied such that it possible to conclude that the site passes this part of the exception test.</p>	
<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	
<p><b>Will the site provide wider sustainability benefits to the community that outweigh flood risk?</b></p> <p>Sustainability Appraisal Summary</p>	<p><b>Positive</b></p> <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>	<p><b>Negative</b></p> <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>
<p><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.</p>		
<p><b>Will the site be safe for its lifetime, without increasing flood risk elsewhere and where possible reduce flood risk overall?</b></p> <p>SFRA level 2</p> <p>No site specific FRA</p>	<p><b>Selected SFRA level 2 evidence</b></p> <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>	
<p><b>Conclusion:</b> No</p>		
<p><b>Conclusion – does the site pass the exception test?</b></p>	<p>No</p>	

## 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:</b> No	
<b>Conclusion – does the site pass the exception test?</b>	No	

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

## 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

<b>Area (ha)</b>	1.02	
<b>Type of development</b>	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)

## 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>	<b>Negative</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>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>	
	<p><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></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. 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> <p><b>Site specific FRA evidence, September 2005</b></p> <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> <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 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.</p>	
	<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

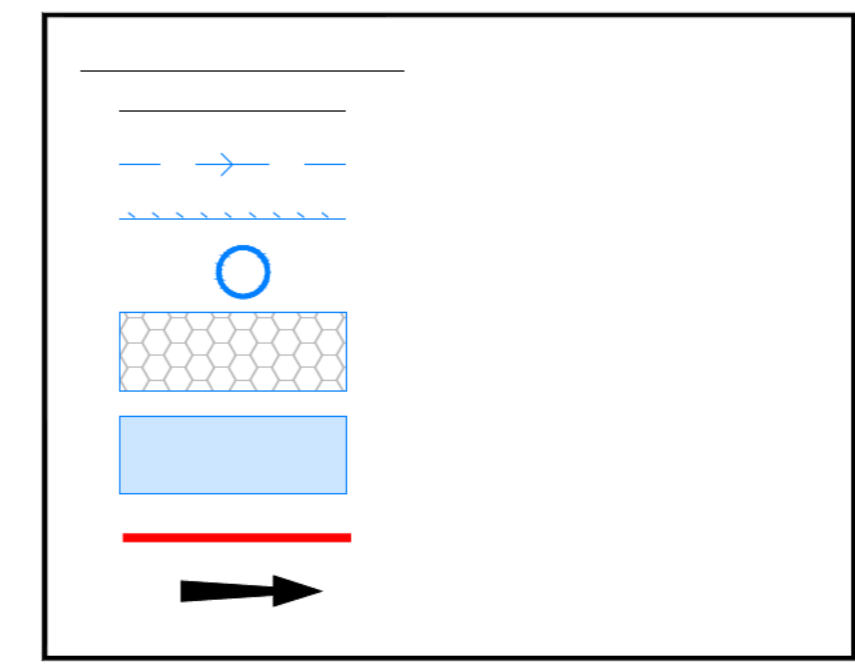
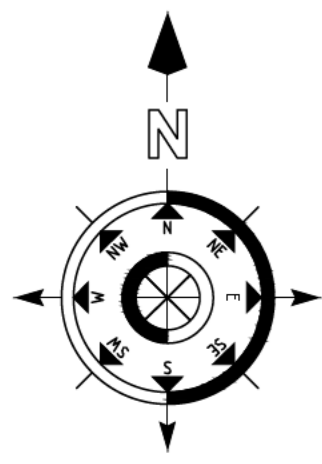
Site ref	SPA	Site name	Area (ha)	FZ3b	FZ3a	FZ2	FZ1	uFMfSW 30yr	uFMfSW 100yr	uFMfSW 1,000yr	Historic Flood Map	Reservoir inundation mapping	Non-flooding factor	Comment
LP2013 SN4	St Neots	St Neots Fire Station and vacant land, St Neots	0.41	0%	0%	68%	32%	11%	10%	21%	100%	91%	Discounted for non-flooding 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.



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INFORMATION



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Lochailort St Ives Ltd

Former Murketts Garage, St Ives, Cambridgeshire PE27 5ER

## Flood Risk Assessment



**MLM.**

Group



## Notice

This document and its contents have been prepared and intended solely for the Clients information and use in relation to the former Murketts Garage, London Road, St Ives, Cambridgeshire PE27 5ER.

MLM Consulting Engineers Limited assumes no responsibility to any other party in respect of or arising out of or in connection with this document and/or its contents.

## Document History

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**Project:** Former Murketts Garage, London Road, St Ives, Cambridgeshire PE27 5ER  
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## Appendix A - Existing Site

Siteline drawing 396MG125B – Outline Survey

EDI Surveys drawing 15281/T/01-01 – Topographical Survey

## Appendix B - Flood Modelling

MLM Technical Note for Modelling – 618862-MLM-ZZ-XX-RP-C-0003-TechNote

Maximum Predicted Flood Depth for 1 in 100 Year Event

## Appendix C - Anglian Water

Wastewater Plan A4 ref: 127689-2

## Appendix D - Surface Water Drainage Strategy

Brownfield Calculations



# 1 Introduction

MLM Consulting Engineers Limited (MLM) has been appointed by Lochailort St Ives Ltd to undertake a site-specific Flood Risk Assessment (FRA) accompany a planning application for the proposed development of land at the Former Car Show Room, London Road, St Ives.

This report has been prepared for the sole use of Lochailort St Ives Ltd and the contents should not be relied upon by others without the express written authority of MLM. If any unauthorised third party makes use of this report they do so at their own risk and MLM owes them no duty of care or skill.

Permission is sought for the redevelopment of the site for residential use which will also comprise car parking. The site is located within the administrative boundary of Huntingdonshire District Council (HDC).

The report is an assessment of flood risk to the development, from on and off-site sources, and to off-site receptors caused by the development of the site. The following standards and guidance, with specific reference to flood risk and drainage, has been used to set the context and requirements for this report:

- National Planning Policy Framework (NPPF - March 2012) and the relevant Planning Practice Guidance (PPG – March 2014);
- The Flood and Water Management Act (2010);
- Non-statutory Technical Standard for Sustainable Drainage Systems (March 2015);
- Huntingdonshire Strategic Flood Risk Assessment Levels 1 and 2 (June 2017); and
- CIRIA C753 – The SuDS Manual.

The site is shown on the Environment Agency (EA) *Flood map for planning* (see Figure 1) to lie in Flood Zone 3 (high risk). Flood Zone 3 is the area described as having a 1% or greater annual probability of fluvial flooding, or a 0.5% or greater annual probability of tidal flooding in any year. The site is shown to be in a location that benefits from defences.

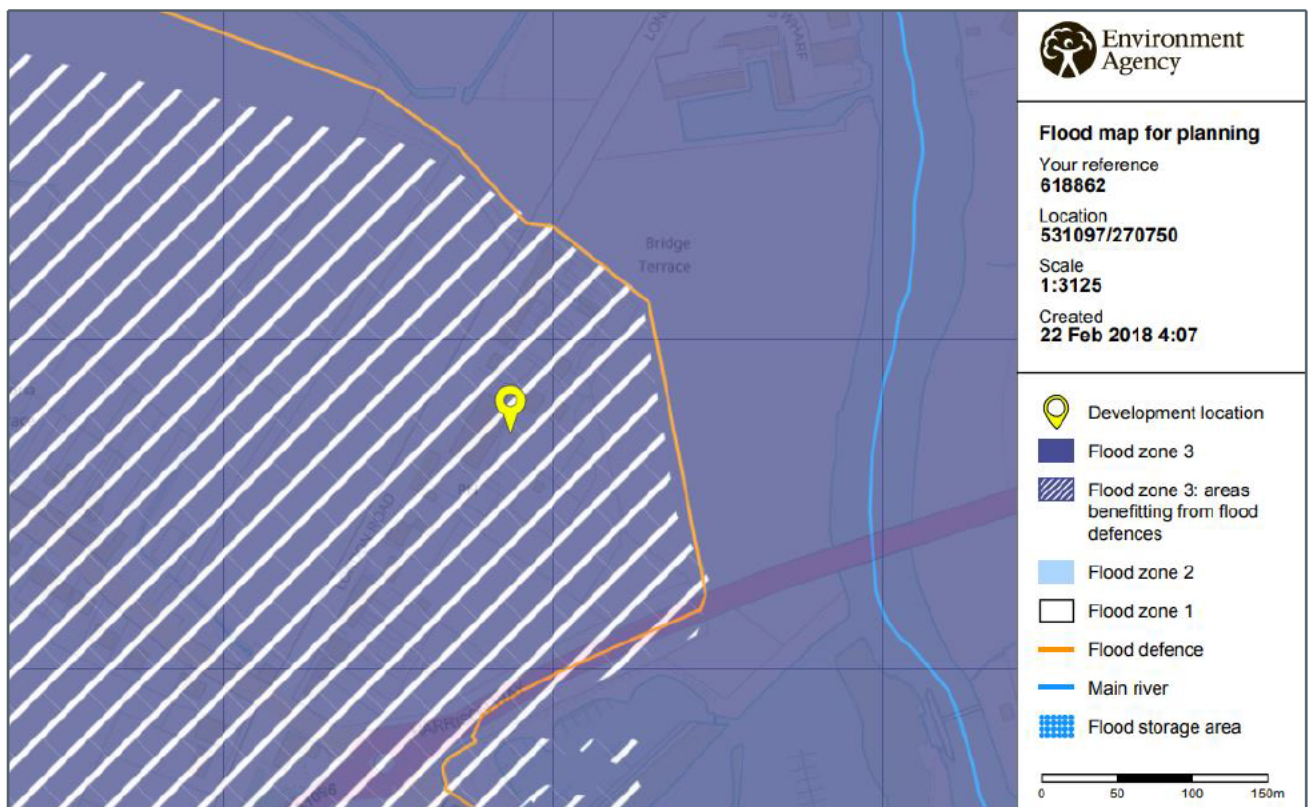


Figure 1 - EA Flood map for planning

This report concludes that in flood risk context, the proposals are safe and appropriate and do not cause any increase in flood risk.

## 1.1 Scope

In Accordance with the assessment criteria found in the NPPF, this report seeks to;

- Ensure that flood mitigation is provided within the site to protect the proposed development and avoid detrimental flood risk impacts to third parties, off site;
- Ensure that the impacts of climate change are adequately accounted for;
- Ensure impermeable areas within the proposed development are minimised where practicable to minimise runoff; and
- Ensure the use of Sustainable Drainage Systems (SuDS) is optimised in line with current best practice.

## 1.2 Sequential and Exception Tests

As identified in the Huntingdonshire Local Plan to 2036, the draft allocation of the site for residential redevelopment was passed during the consultation meeting in July 2017. The draft allocation document states that “despite the flood risk present at the site, the potential to regenerate this currently derelict, previously developed site presents opportunities to enhance the street scene, and in particular the character and appearance of the conservation area. It is therefore considered that the sustainable location of the site and identified need for housing, outweigh the risks posed by potential flooding”.

As identified in the Local Plan Draft Allocation, this FRA report is prepared to assess flood risks to and from the site and to identify appropriate mitigation measures to ensure the proposals will not be at risk of flooding and will not increase flood risk elsewhere.

In accordance with the PPG, the Sequential Test ensures that a sequential approach is followed to steer new development to areas with the lowest probability of flooding. In accordance with Table 3 of Technical Guidance to the NPPF, the Sequential Test is required to be passed for developments proposed in Flood Zones 3. The Sequential Test does not form part of this FRA.

Paragraph 102 of the NPPF states that for the Exception Test to be passed:

- It must be demonstrated that the development provides wider sustainability benefits to the community that outweigh the flood risk, informed by a Strategic Flood Risk Assessment where one has been prepared; and
- A site-specific flood risk assessment must demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

Both elements of the test will have to be passed for development to be allocated or permitted. The second part of the Exception Test, that the development will be safe for its lifetime, is addressed by this FRA; the first part of the Exception Test, relating to sustainability benefits does not form part of this FRA.

## 2 Site Description

### 2.1 Existing Site

The site is located close to St. Ives town centre and is centered on approximate Ordnance Survey (OS) grid reference 531102,270745 (see Figure 2). The site extends to approximately 1.22 hectares (ha).

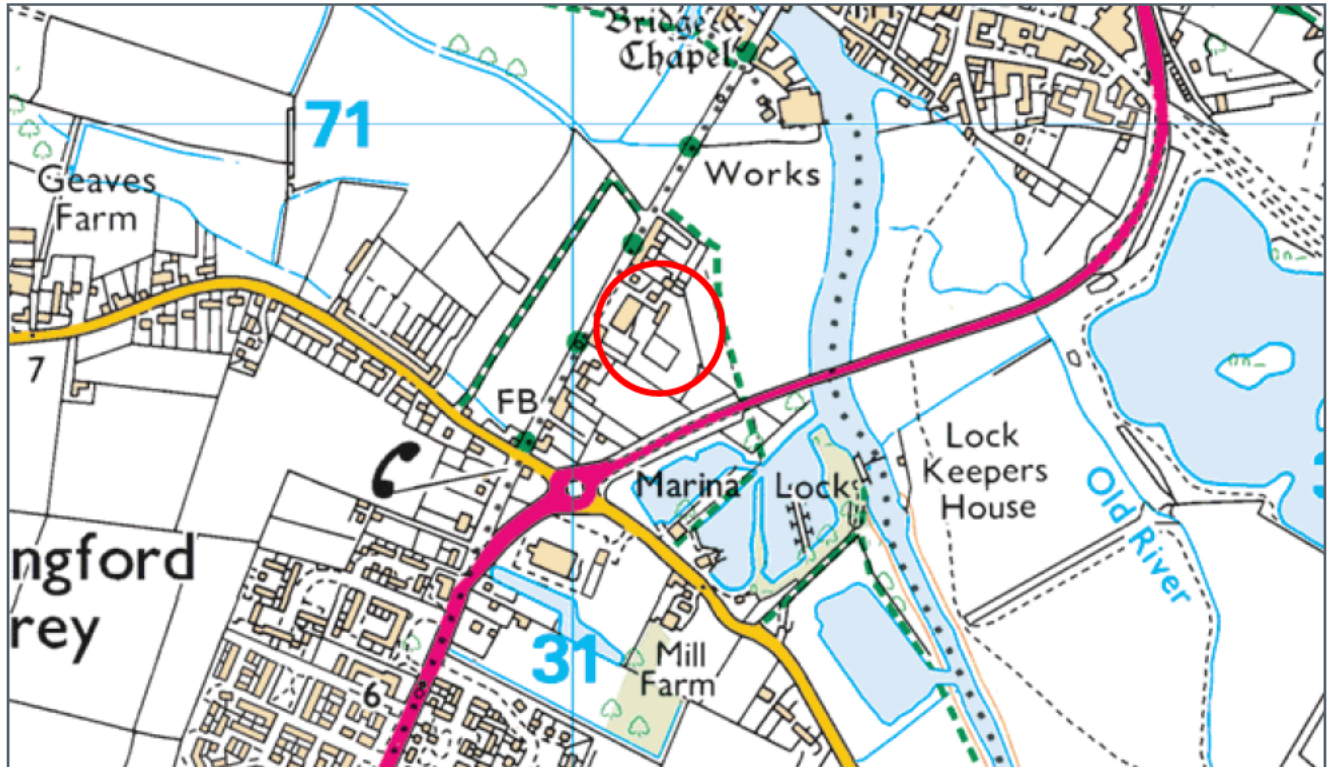


Figure 2 – Site location

The brownfield site previously comprised a car showroom with associated car parking, however, it has been vacant for a number of years. A National Grid gas valve compound lies outside the ownership of the Client but is encircled by the site.

The surrounding land use comprises a mixture of commercial, residential and agricultural usage. The north and south of the site are bounded by residential properties. To the east is an area of open grassland that forms part of the floodplain of the River Great Ouse, and includes a grassed earth bank which acts as a flood defence. The west of the site is bounded by London Road.

There are two existing accesses into the site. The site is accessed from north via London Road and from south-west. The access from south-west serves the National Grid gas valve compound.

#### 2.1.1 Hydrology

The nearest Main River is the River Great Ouse located approximately 100 metres (m) east of the site.

The Environment Agency Asset Data map for St Ives indicates that the site is located in an area currently benefiting from flood defences. The flood defences are comprised of earth embankments and located approximately 30m to the east of the site. It is understood that the flood defence embankment was constructed between 2003 and 2006.

## 2.1.2 Geology

The British Geological Survey (BGS) online mapping indicates that the site is underlain with sand and gravel associated with superficial deposits of River Terrace Deposits. The bedrock geology has been identified to be Oxford Clay Formation (Mudstone).

## 2.1.3 Topography

The topographical survey of the site (see Appendix A) shows the site to fall slightly from west to east. Ground levels in the west of the site are circa 6.5 metres Above Ordnance Datum (mAOD), rising to circa 7.4 mAOD towards the centre of the site before falling to circa 5.7 mAOD in the east.

## 2.1.4 Flooding History

The SFRA indicates that Huntingdonshire has a history of documented flood events with the main source being from 'fluvial' (Watercourse) sources.

It has been noted that St Ives, which is built on the banks of the wide Great Ouse River between Huntingdon and Ely, has flooded frequently in the past. The most significant floods were in 1947, Easter 1998 and January 2003. Since these events occurred, extensive flood protection works were carried out in St Ives in 2006/2007. The defences were recorded to have been breached in December 2012.

## 2.1.5 Climate Change

Due to the uncertainties in flood estimation and expected climate change impacts, it is required that flood flows should include an allowance for increased flow due to climate change as outlined in the NPPF. The latest guidance published in December 2016 provides updated climate change allowances and is now required for all Flood Risk Assessments (FRAs) unless a planning application has already been submitted to the local planning authority.

Following the meeting with the EA on 30 January 2018, it was agreed that the 35% climate change allowance is the most appropriate allowance for managing residual risk to the site. This is the higher central allowance based upon the development proposals at the site.

## 2.2 Proposed Development

It is proposed to develop the site for residential use. This site was taken forward to the Level 2 Strategic Flood Risk Assessment (SFRA) in which a more detailed flood risk analysis has been undertaken for the site. The Huntingdonshire SFRA (2017) shows that the higher flood risk (Flood Zone 3a) is located around the boundary of the site, with the lower risk (Flood Zone 2) towards the centre. The centre of the site is located in Flood Zone 1, the area at low risk of flooding.

Residential use is classified as 'More Vulnerable' in accordance with *Table 2: Flood Risk Vulnerability Classification* of the PPG. As the site is located in Flood Zone 3, the proposed development is shown to be appropriate in accordance with *Table 3: Flood risk vulnerability and flood zone 'compatibility'* of the PPG. The Exception Test is required for 'More Vulnerable' land uses located in Flood Zone 3. This FRA deals with the second part of the Exception Test showing the site will be safe for its lifetime.

The Sequential Test, the aim of which is to steer new development to the areas with the lowest probability of flooding, is required to be passed for developments proposed in Flood Zone 3. The Sequential Test does not form part of this FRA.

## 3 Policy Context

### 3.1 National Planning Policy Framework (March 2012)

The National Planning Policy Framework (NPPF) was enacted on 27 March 2012; paragraph 100 to 108 inclusive, established the Planning Policy relating to flood risk management. The Technical Guide to the NPPF has been superseded by the Planning Practice Guidance (PPG) in March 2014. However, there are no changes to any policies relating to flood risk.

The main focus of the policy is to direct development towards areas of the lowest practicable flood risk to ensure that all development is safe, without increasing flood risk elsewhere. The main considerations are:

- Applying the Sequential Test, and if necessary, apply the Exception Test;
- Safeguarding land from development that is required for current and future flood management;
- Using opportunities offered by new development to reduce the causes and impacts of flooding; and
- Where climate change is expected to increase flood risk so that some existing development may not be sustainable in the long-term, seeking opportunities to facilitate the relocation of development, including housing, to more sustainable locations.

The NPPF states that a Flood Risk Assessment is required “for proposals of 1 hectare or greater in Flood Zone 1; all proposals for new development (including minor development and change of use) in Flood Zones 2 and 3, or in an area within Flood Zone 1 where proposed development or a change of use to a more vulnerable class may be subject to other sources of flooding”.

### 3.2 Flood and Water Management Act (2010)

The Flood and Water Management Act 2010 defines clearer roles and responsibilities for the implementation of sustainable drainage (SuDS) in developments, by requiring drainage systems to be approved against a set of draft national standards.

In December 2014 the government set out changes to planning that apply to major development from 06 April 2015. This change confirmed that in considering planning applications, local planning authorities (LPA) should consult the relevant Lead Local Flood Authority (LLFA) on the management of surface water; satisfy themselves that the proposed minimum standards of operation are appropriate and ensure through the use of planning conditions or planning obligations that there are clear arrangements in place for ongoing maintenance over the lifetime of the development.

On 15 April 2015, Lead Local Flood Authority’s became a statutory consultee on surface water and SuDS proposals.

### 3.3 Huntingdonshire Level 1 and 2 Strategic Flood Risk Assessment (2017)

A Strategic Flood Risk Assessment (SFRA) was completed by JBA in 2017 on behalf of HDC. The primary objective of the SFRA is to allow Council to select and develop sustainable site locations away from areas susceptible to flood risk and to inform the flooding policies, including the allocation of land for future development, within the emerging Local Development Plan.

The Level 2 SFRA indicates that developers should, where required, undertake more detailed hydrological and hydraulic assessments of the watercourses to verify flood extent (including latest climate change allowances), inform development zoning within the site and prove, if required, whether the Exception Test can be passed. Where the watercourses are embanked, the effect of overtopping and breach must be considered and appropriately assessed.



## 4 Sources of Flooding

The NPPF requires flood risk from the following sources to be assessed, each of which are assessed separately below:

- Fluvial sources (river flooding);
- Tidal sources (flooding from the sea);
- Pluvial sources (flooding resulting from overland flows);
- Groundwater sources;
- Artificial sources, canals, reservoirs etc; and
- It also requires the risk from increases in surface water discharge to be assessed.

The sources are discussed in more detail in the sections below.

### 4.1 Tidal and Fluvial Flooding

Tidal flooding is typically the result of extreme tidal conditions caused by severe weather which may cause a storm surge where water is pushed onshore through elements such as high winds and storms. Fluvial flooding occurs when excessive rainfall over an extended period of time, flash downpours or heavy snow melt causes a river to exceed its capacity.

The primary source of potential flooding is from fluvial sources associated with the River Great Ouse.

#### 4.1.1 Overtopping Risk

The EA *Flood map for planning* indicates that the site benefits from defences, which are located along the eastern boundary of the site, extending round to the north and continuing westwards (see Figure 3). The defences are designed to protect properties to a 1% AEP standard of protection.

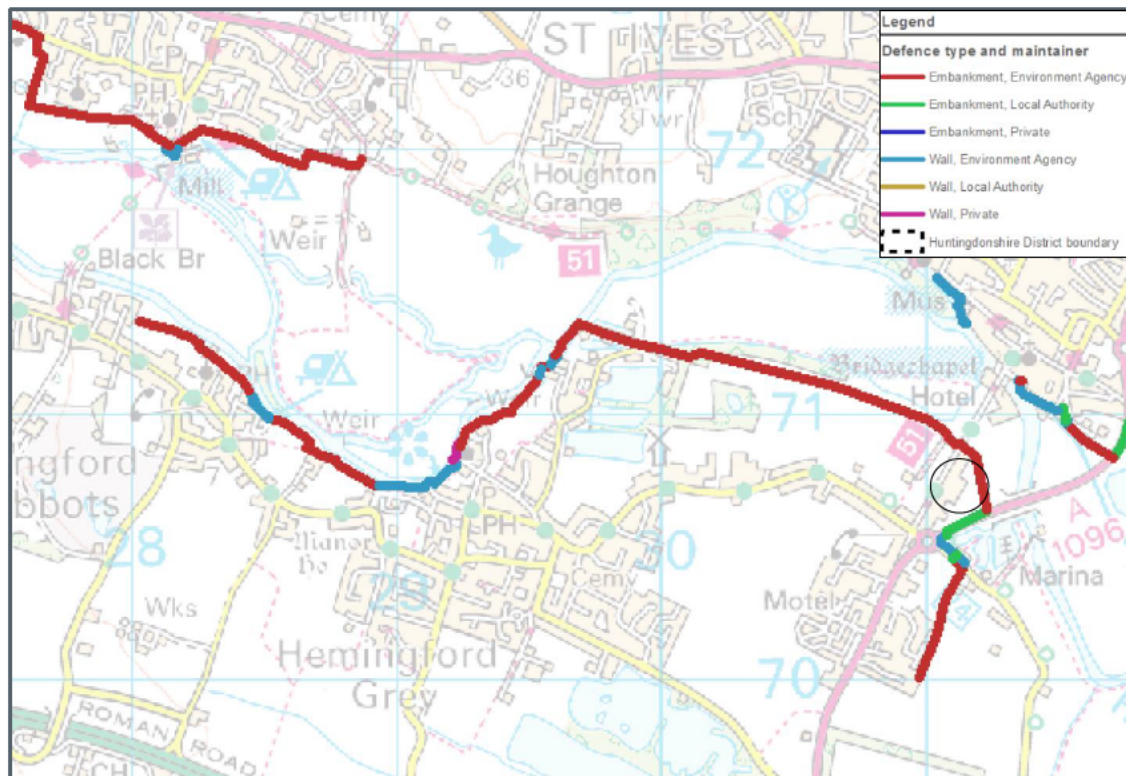


Figure 3 - Houghton and the Hemingfords Defences (SFRA 2017) (black circle denotes site location)

The existing flood defences are made up of earth grassed embankments, with the crest of the embankments set between 7.29m AOD and 7.34m AOD. The EA flood data for the River Great Ouse also indicates that the predicted peak flood level for the River Great Ouse is predicted to be 6.894m AOD for the 1% AEP inclusive of 35% allowance for climate change, providing a minimum clearance of 0.396m.

As such and taking into account the distance from the River Great Ouse, the risk posed to the site from overtopping is considered low.

#### 4.1.2 Breach Risk

Following an initial consultation with the EA, it was advised to carry out a breach analysis appropriate to the scale of development in order to determine floor levels as a result of residual risk.

A new site-specific breach modelling exercise was undertaken by MLM in December 2017 in accordance with the Level 2 SFRA for HDC and the EA requirements for Completing Computer River Modelling for Flood Risk Assessments (2009).

The breach modelling was undertaken using the EA approved hydraulic model of the River Great Ouse, which was completed by Mott MacDonald in 2015. The analysis was carried out using TUFLOW software and the hydraulic model was updated using the latest LiDAR data, which was obtained from the EA.

A topographical survey of the embankments was carried out in November 2017 to confirm the level of protection afforded to the site by the flood defences (see Appendix A for topographical survey). The new breach model was updated using the latest topographical survey to ensure the embankment heights and floodplain features are accurately represented in the new breach model.

The existing hydraulic model of the River Great Ouse extends from Great Bedford to Stretham, and it includes 23 key towns in East Anglia. Due to the scale of the site it was deemed appropriate to truncate the existing model to cover Hemingford Grey. The new breach model starts from Meadow Lane in Hemingford Grey (XS Ref GTO14400) and extends downstream for approximately 9 km to Over.

The breach location considered for this exercise is located approximately 40m to the east of the site; breach parameters were selected based on the guidance available from the EA's Anglian Region for assessing the extent of flooding if defences breach. In line with the EA's Anglian Region guidance for a breach of an earth embankment, it was assumed that the breach extends to ground level at the landward toe of the embankment. The breach parameters from the EA Anglian Region Guidance Note (Table 4) is summarised in Table 1 below.

Table 1: Breach parameters used in the breach modelling assessment

Breach Location	Landward Ground Level (mAOD)	Defence Type	Breach Width (m)	Time to Close (hours)
531202, 270752	5.28	Earth Embankment	40	30

The breach modelling was undertaken for 'open' condition. The 'open' condition represents the breach occurring with embankment crest level lowered to ground level. As a sensitivity test the breach modelling also carried out for 'peak' condition. 'Peak' condition represents the embankment failing at the peak of the flow hydrograph.

The above methodology was discussed and agreed with the Environment Agency during a meeting held on 30 January 2018.

It was predicted that in the unlikely event that the embankment adjacent to the eastern boundary of the site was breached, parts of the site would be flooded, with maximum flood levels predicted to be up to 6.86m AOD for the 100 year fluvial including 35% allowance for climate change (Figure 4).

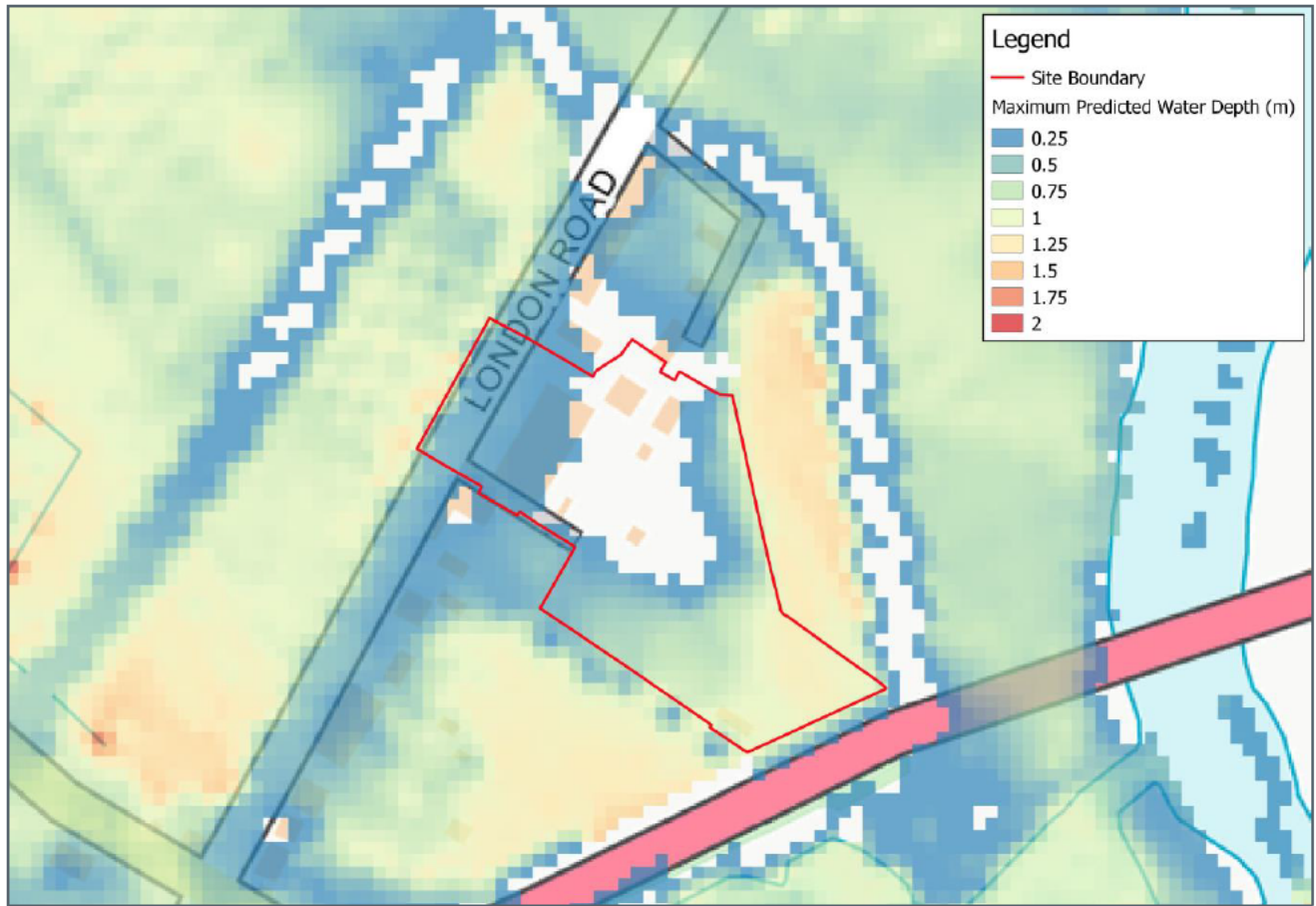


Figure 4: Breach Map

As agreed with the EA, the finished floor levels for 'more vulnerable' uses (i.e. sleeping accommodation) would be set at a minimum of 6.86m AOD, which would ensure that safe refuge is available on the first floor or above in the unlikely event of a breach, plus 300mm freeboard as a safety factor, i.e. 7.16m AOD.

#### 4.1.3 Safe Access/Egress

In the unlikely event of a breach occurring, the preferred option would be to evacuate the occupants to higher ground via routes that avoid flood water.

Following a 1 in 100 year plus 35% climate change breach, flood water could reach the site boundary, including London Road. However, the modelling outputs have demonstrated that Harrison Way to the south eastern boundary of the site would remain free from flooding. Currently Harrison Way can be accessed via a set of steps from the rear of the site. This access route can be maintained and enhanced to provide emergency pedestrian access in the unlikely event of a breach.

Also, to mitigate the risk of flooding a Flood Management Plan (FMP) should be held and maintained within the development. The plan should set out what measures should be taken in the event of a breach of the defences and/or flooding on site. It should indicate details of how and to where people should evacuate and where safe refuge can be found on site in the event that it is not considered safe to leave the site.

#### 4.1.4 Flood Resilience

The Communities and Local Government document *Improving the Flood Performance of New Buildings: Flood Resilient Construction* makes general recommendations for the construction of new buildings, to provide a reasonable level of flood resistance to their structural elements and finishes. The choice of materials within the proposed development should be undertaken in such a manner as to ensure that the building is as resistant to damage by flood water as is reasonably practicable. Flood resilience measures should be continued to 600mm above the breach flood level of 6.86m AOD, i.e. 7.46m AOD.

The flood modelling technical note for the breach and overtopping modelling is included as Appendix B to this report.

#### 4.2 Surface Water from Off-Site

There is always a potential risk of surface water flooding from very high intensity rainfall events exceeding the capacity of drainage systems and causing flooding, especially in urban areas. Surface water run-off can be channelled either by natural features such as valley lines or by artificial features such as highways, to low points in the topography. If surface water is not able to flow away from the low points then pluvial flooding can occur.

Given the flat nature of the land in this area it is unlikely that surface water would be shed towards the site.

The GOV.UK *Flood risk from surface water – Extent of flooding* online mapping (see Figure 5) shows the site to be at a very low risk of flooding from surface water.

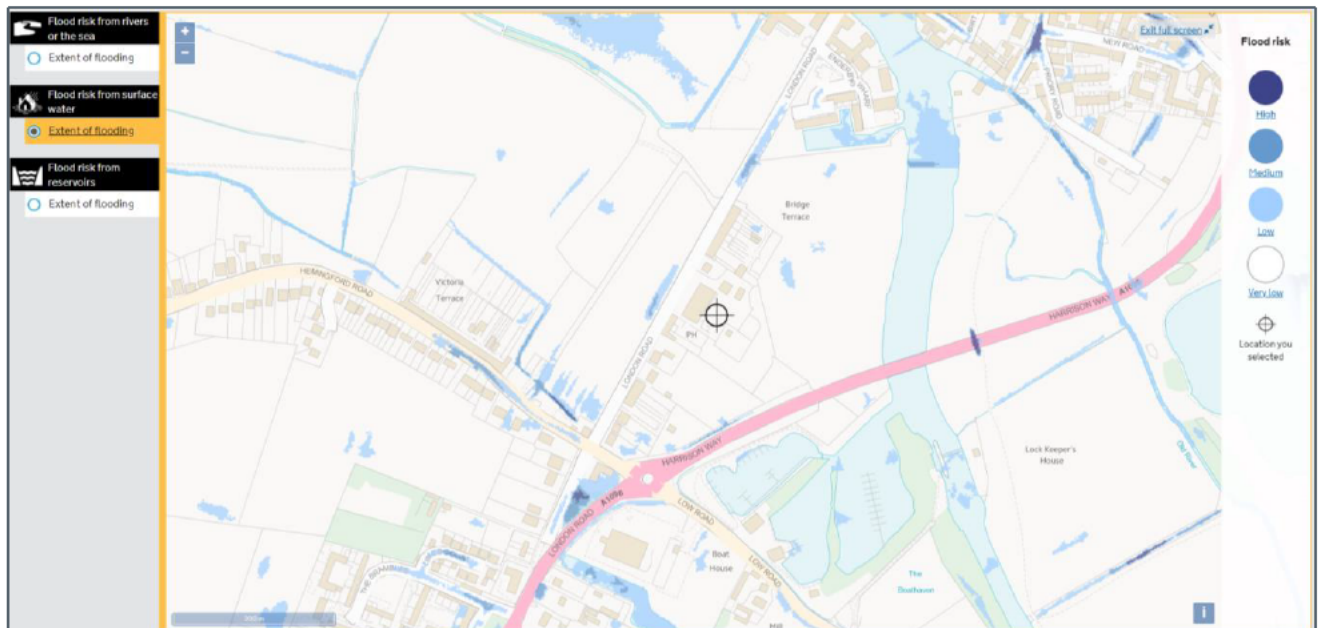


Figure 5 - GOV.UK *Flood risk from surface water – Extent of flooding*

A low to medium risk is shown on the opposite side of London Road. This area is shown on the topographical survey to be at the bottom of a bank and is therefore at a lower elevation than the site and would not affect the site.

Finished floor levels should adhere to normal good practice and be raised above surrounding ground levels with falls away from the building. This should minimise the risk of any minor localised ponding or overland surface water flow from entering the proposed building.

Assuming that mitigation advice given above is followed, the risk of flooding from this source is considered to be low.

### 4.3 Surface Water from On-Site

The proposed development will increase the impermeable area at the site which could increase overland flow on the site, if not properly managed. This risk should be mitigated by careful design of levels to ensure that any overland flows are directed around the proposed buildings and by ensuring that any low ground levels adjacent to the buildings have a suitable overland flood flow route and do not rely entirely on piped drainage systems.

Surface water run-off from the site should be collected, attenuated and disposed of so there is no increased off-site flood risk.

Assuming the advice given above is followed, the risk of flooding from this source is considered to be low.

### 4.4 Infrastructure Flooding

Anglian Water (AW) sewer records (see Appendix C) show foul water sewers located in London Road and to the west of the site.

If surcharging or blockage of any sewers or drains in the vicinity of the site did occur it is possible that there may be localised surface flooding in areas surrounding the site. However, falls away from buildings, as described above, should help mitigate against this risk.

The site is considered to be at low risk of flooding from infrastructure failure.

### 4.5 Water Bodies

The GOV.UK *Flood risk from reservoirs – Extent of flooding* map (see Figure 6) shows that the south of the site could be at risk of flooding from reservoir failure; no developments are proposed in this area and as such flooding would only affect the playing field area.

Advice given on the GOV.UK website states that *'flooding from reservoirs is extremely unlikely. There has been no loss of life in the UK from reservoir flooding since 1925.'*

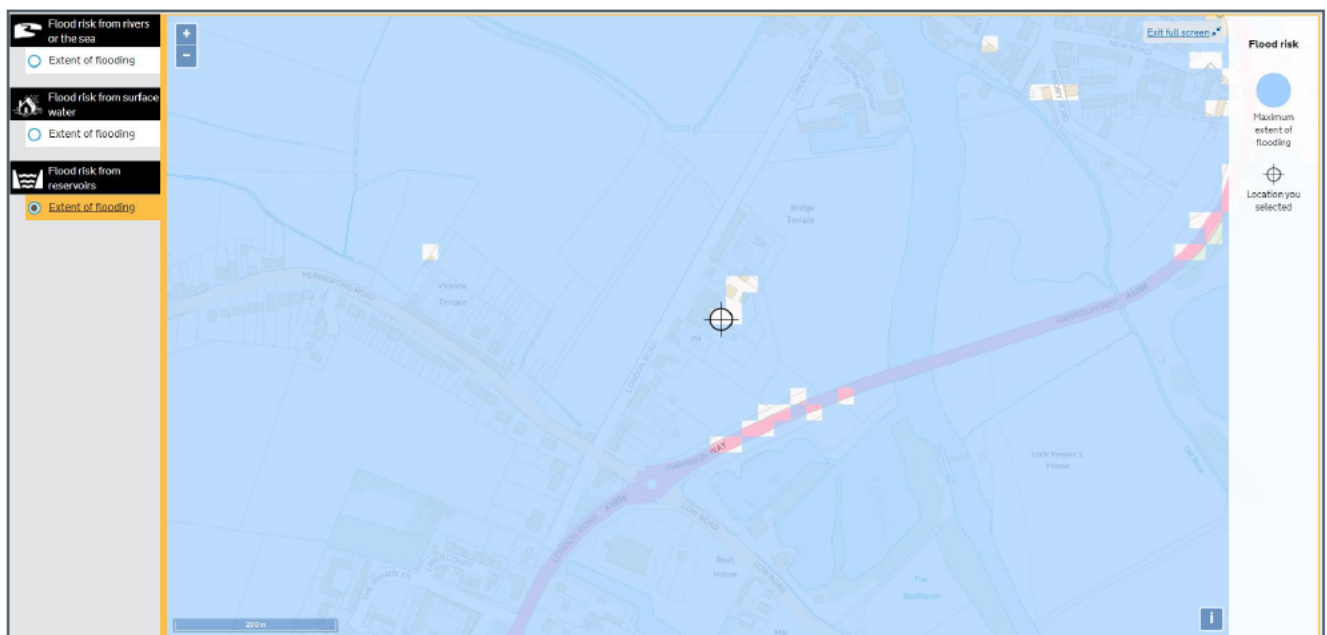


Figure 6 - GOV.UK *Flood risk from reservoirs – Extent of flooding*

The site is considered to be at low risk of flooding from this source.

## 4.6 Groundwater

Geology mapping (refer to Section 2) shows that the sites geology is impermeable.

The Environment Agency (EA) Groundwater map indicates that the site is located outside the Groundwater Source Protection Zone. The site is located in the 'Medium-Low' Groundwater Vulnerability Zone as shown in Figure 7 below.

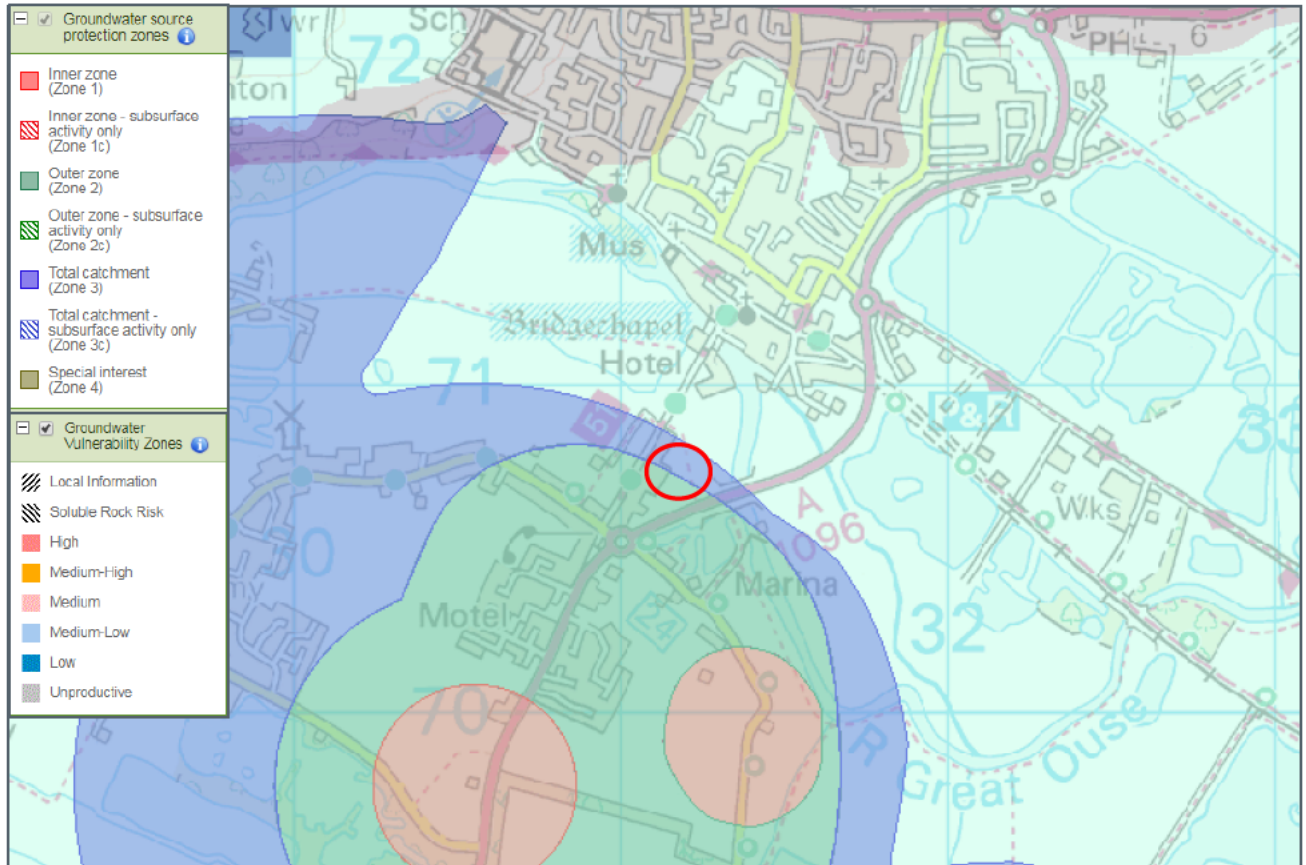


Figure 7 – EA Groundwater Vulnerability Zones (red circle denotes site location)

In the unlikely event that groundwater did express at the surface, it would be routed around buildings as described above.

The site is considered to be at low risk of flooding from this source.

## 4.7 Flood Risk Summary

The site is considered to be at a low risk of flooding from all sources, although there is a residual risk of flooding in the event of a breach of the defences.

The internal ground floor levels for sleeping accommodations should be set at a minimum of 6.86m AOD plus 300mm allowance for freeboard level. Flood doors will be placed on the units along the eastern boundary of the site to protect the properties from flooding. Additional flood resilient construction techniques will also be carried out to mitigate against the potential surface water or sewer flooding at the site. It is also advised that a Flood Management Plan should be kept on site and an internal safe refuge should be provided at 300m above the breach level for the 1 in 100 year, inclusive of 35% allowance for climate change (7.16m AOD).

Provided that mitigation measures discussed above are addressed, the site is assessed as not being at any significant risk of flooding from all sources.

## 5 Surface Water Drainage Strategy

### 5.1 Existing Surface Water Drainage

The existing site is brownfield land with an impermeable area of approximately 1.070 ha.

It is currently assumed that all existing drainage from the proposed buildings and hardstandings is drained via a private drainage networks and ultimately discharges to the AW sewer in London Road to the west of the site.

The existing run-off rate has been calculated using the Modified Rational Method (see brownfield calculations in Appendix D) and are based on the existing impermeable area of the site (1.070 ha). In summary, the pre-development discharge rates for the site are:

Table 2: Brownfield discharge rates

AEP Event	Brownfield Discharge Rate (l/s)
100%	4.13
3.3%	8.69
1%	11.1

AEP = Annual Exceedance Probability

### 5.2 Proposed Surface Water Drainage

The DEFRA *Sustainable Drainage Systems Non-statutory technical standards for sustainable drainage systems* guidance requires that discharge of surface water run-off from the site should be restricted to greenfield rates. Once a masterplan layout is formed and becomes available for the site, the greenfield run-off discharge rates will be calculated using the ICP SuDS method in MicroDrainage and FEH data. The greenfield run-off discharge rates will be based on the proposed impermeable areas, as recommended in C753.

Once a masterplan is formed, a sustainable drainage strategy (SuDS) will be developed to ensure the surface water run-off from the site are appropriately managed and treated and do not result in increase in surface water flooding elsewhere.

## 6 Conclusions and Recommendations

The site is located in Flood Zones 1, 2 and 3 from residual flooding associated with a breach of the embankments to the east of the site. The site is at low risk of flooding from pluvial and ground water flooding.

The draft allocation of the site for residential redevelopment was passed during the consultation meeting in July 2017.

Following the initial consultation with the EA, a detailed breach analysis was undertaken to determine floor levels as a result of residual risk. The modelling methodology and approach was discussed and agreed with the EA during a meeting on 30 January 2018.

It was predicted that in the unlikely event that the flood defence embankment was breached, parts of the site would be flooded, with maximum flood levels predicted to be up to 6.86m AOD for the 100 year fluvial including 35% allowance for climate change.

Within areas identified as Flood Zone 3, the less vulnerable uses (i.e. kitchen, utility rooms, living rooms and garages) can be set at ground level, with bedrooms on upper floors (above breach flood level for the 1 in 100 year, inclusive of 35% climate change). Flood resilient construction techniques should also be carried out. A Flood Management Plan should be kept on site and an internal safe refuge should be provided at 300m above the breach level for the 1 in 100 year, inclusive of 35% allowance for climate change, i.e. 7.16m AOD. Emergency access should be provided via the existing steps leading to Harrison Way.

The site is considered to be at low risk of flooding from surface water, groundwater and artificial sources.

The proposed surface water discharge rates will be reduced to Greenfield run-off rates, and once a masterplan is formed, a sustainable drainage strategy (SuDS) will be developed to ensure the surface water runoff from the site are appropriately managed and treated and do not result in increase in surface water flooding elsewhere.

This Flood Risk Assessment has demonstrated that the flood risks associated with the site can be managed appropriately and as such, the level of flood risk can be downgraded or reduced.

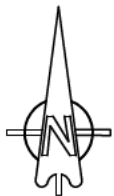
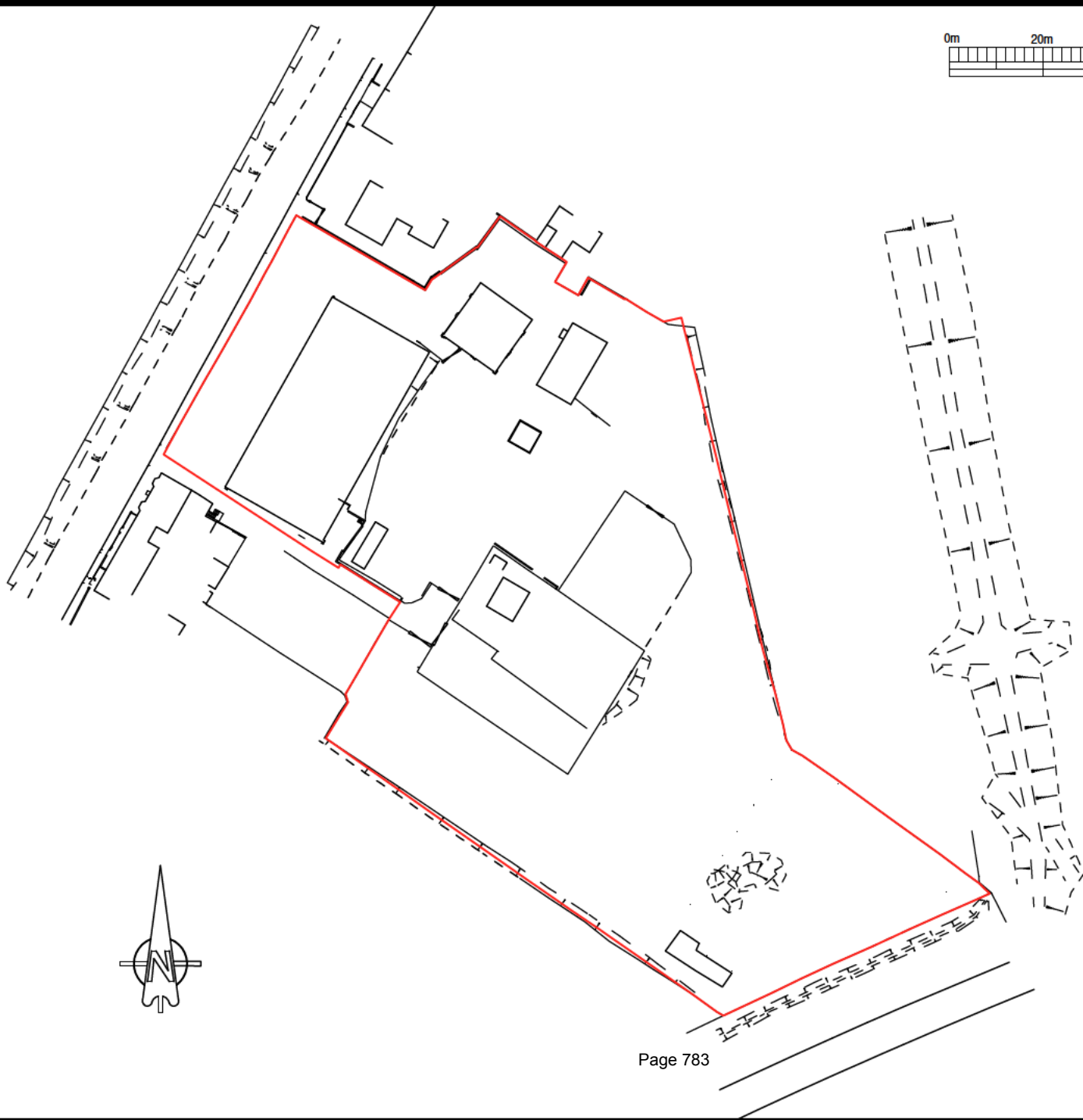
In conclusion, this FRA demonstrates that the proposals are consistent with the aims of the NPPF and its Planning Practice Guidance, along with the aims of the Strategic Flood Risk Assessment. The site will not be at significant risk of flooding, or increase flood risk to others.



## Appendix A - Existing Site

Siteline drawing 396MG125B – Outline Survey

EDI Surveys drawing 15281/T/01-01 – Topographical Survey



Revision B - November 2016  
 Proposed ownership boundary added  
 Revision A - November 2016  
 Survey extended

Geomatic Surveyors

**siteline**

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 34 Parham Drive  
 Eastleigh  
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LOCHAILORT INVESTMENTS LTD Client

MURKETT'S GARAGE Contract  
 LONDON ROAD  
 ST. IVES

OUTLINE SURVEY Title

396MG125B Drawing No.

FEBRUARY 2015 Date

1:1250 (A4) Scale

ST Surveyor



## Appendix B - Flood Modelling

MLM Technical Note for Modelling – 618862-MLM-ZZ-XX-RP-C-0003-TechNote

Maximum Predicted Flood Depth for 1 in 100 Year Event

## Technical Note - Modelling

### 1 Background

The site is located close to St. Ives town centre. The entirety of the site is previously developed which comprised a car showroom with associated car parking. A National Grid gas valve compound lies outside the ownership of Lochailort St Ives Ltd but is encircled by the site.

The site has been vacant for a number of years, however it could lawfully reopen for car sales, maintenance and storage at any time. In its current state, the site severely harms the character and appearance of the Conservation Area.

There are two existing accesses into the site. The site is accessed from north via London Road and from south-west. The access from south-west serves the National Grid gas valve compound.

As identified in the Huntingdonshire Local Plan to 2036, the draft allocation of the site for residential redevelopment was passed during the consultation meeting in July 2017. The draft allocation document states that “despite the flood risk present at the site, the potential to regenerate this currently derelict, previously developed site presents opportunities to enhance the street scene, and in particular the character and appearance of the conservation area. It is therefore considered that the sustainable location of the site and identified need for housing, outweigh the risks posed by potential flooding”.

In accordance with the assessment criteria found in the National Planning Policy Framework (NPPF) and its Planning Practice Guidance (PPG), a site-specific detailed modelling exercise has been undertaken to accurately assess flood risk to the site.

### 2 Modelling Approach

This modelling assessment has been undertaken to understand the flood risks associated with the River Great Ouse that flows to the south of the site and the associated flood extent and level should a breach occur in the embankment protecting the site from the south.

The hydraulic model for this study is a linked 1D-2D model which has been built based on the Environment Agency (EA) approved model of the River Great Ouse which was built using ISIS and TufLOW software.

To overcome stability issues associated with the original ISIS-TufLOW model, the 1D cross-sections representing the watercourse have been converted and are now being represented in the ESTRY module of TufLOW software. Floodplain features are being represented in the 2D domain of the model.

The existing hydraulic model of the River Great Ouse extends from Great Bedford to Stretham, and it includes 23 key towns in East Anglia. Due to the scale of the site it was deemed appropriate to truncate the existing model to cover Hemingford Grey. The new breach model starts from Meadow Lane in Hemingford Grey (XS Ref GTO14400) and extends downstream for approximately 9 km to Over.



**Job Title:** Former Murketts Garage, St Ives, Cambridgeshire  
**Document Title:** Modelling Note  
**Document Reference:** 618862-MLM-ZZ-XX-RP-C-0001  
**MLM Reference:** JRC/618862/RA  
**Date:** 2 March 2018

### 3 Topographical Survey

A topographical survey was undertaken by Geomatics Surveyors in November 2017 to pick up the drains, embankments and roads (London Road and Harrison Way) on and off site.

The information from the latest topographical survey has been used to create the ground model in the form of a surface Triangulated Irregular Network (TIN) to represent the existing topographical features within the site.

The ground model for the site has been developed using AutoCAD Civil 3D. The ground model was exported into the .xyz format, and the .xyz data has been gridded and converted into an .ASC grid.

The ground terrain model was used in combination with the 1m resolution LiDAR data to produce a representation of the land topography within the model code region. The model is based on a cell size of 5m, and therefore the 1m resolution DTM is considered sufficient as a basis for this study. It is worth noting that the original model comprises of a 20m grid size.

### 4 Model Development

The River Great Ouse, which runs approximately 100m to the east of the site at its nearest point, was represented using the ESTRY component of the model. It was considered appropriate to apply gully lines to represent the ordinary watercourse at Hemingford Meadow, outside the site. Gully lines characterising the watercourse have been samples from the latest channel survey data. Culvert structures have been represented using ESTRY.

The breach location considered for this exercise is located approximately 40m to the east of the site; breach parameters were selected based on the guidance available from the EA's Anglian Region for assessing the extent of flooding if defences breach. In line with the EA's Anglian Region guidance for a breach of an earth embankment, it was assumed that the breach extends to ground level at the landward toe of the embankment. The breach parameters from the EA Anglian Region Guidance Note is summarised in Table 1 below.

Table 1: Breach parameters used in the breach modelling assessment

Breach Location	Landward Ground Level (m AOD)	Defence Type	Breach Width (m)	Time to Close (hours)
531202, 270752	5.28m AOD	Earth Embankment	40	30

The breach modelling was undertaken for 'open' condition. The 'open' condition represents the breach occurring with embankment crest level lowered to ground level. As a sensitivity the breach modelling as also carried out for 'peak' condition. 'Peak' condition represents the embankment failing at the peak of the flow hydrograph.



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**Document Reference:** 618862-MLM-ZZ-XX-RP-C-0001  
**MLM Reference:** JRC/618862/RA  
**Date:** 2 March 2018

## 5 Land Classification

The roughness values for both in-channel and floodplain features have been kept the same as the original model.

Table 2 below shows the applied roughness coefficient values within the 2D domain.

Table 2: Manning's n Values for land Classification

Land Type	Manning's n Value
General Surface/Roadside	0.05
Buildings	0.30
Glasshouse	0.3
Inland water	0.035
Natural Environment	0.10
Path	0.02
Rail	0.04
Structure	0.03

## 6 Boundary Conditions

The hydrological input for the catchment is based on the hydrological assessment undertaken for the River Great Ouse model. The inflow into the 2D is represented by a discharge-time (QT) series, which is extracted from ISIS Cross-section GTO14400. The location of the inflow node is shown in Figure 1 below.

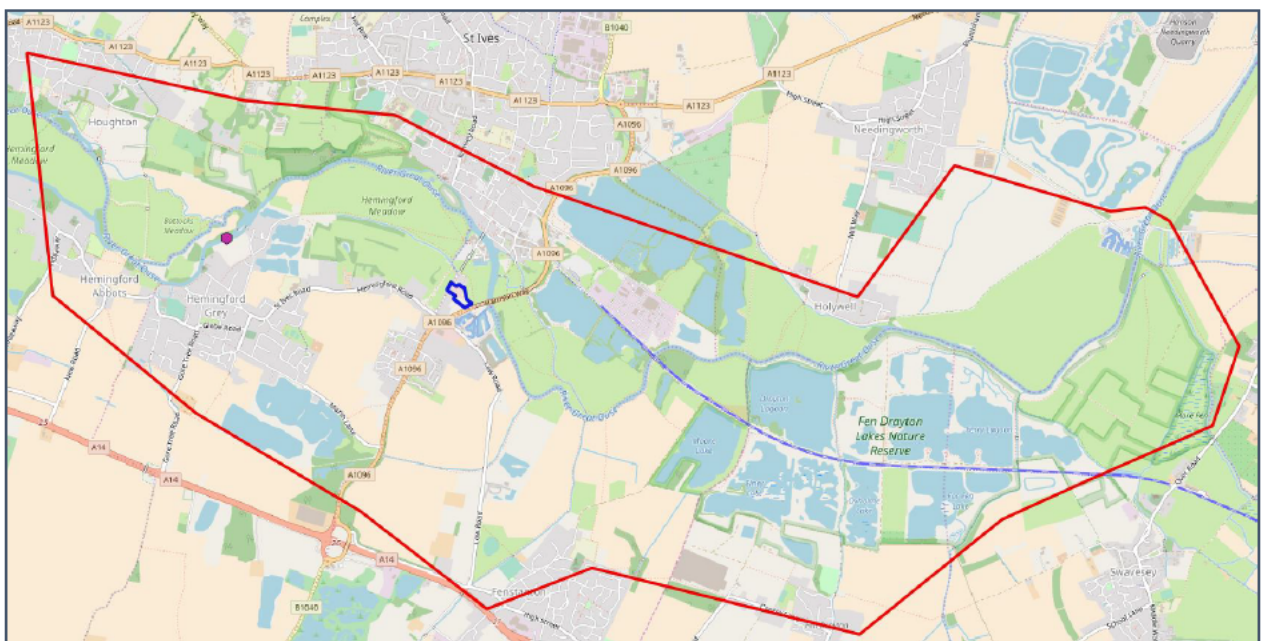


Figure 1: Model Extent



**Job Title:** Former Murketts Garage, St Ives, Cambridgeshire  
**Document Title:** Modelling Note

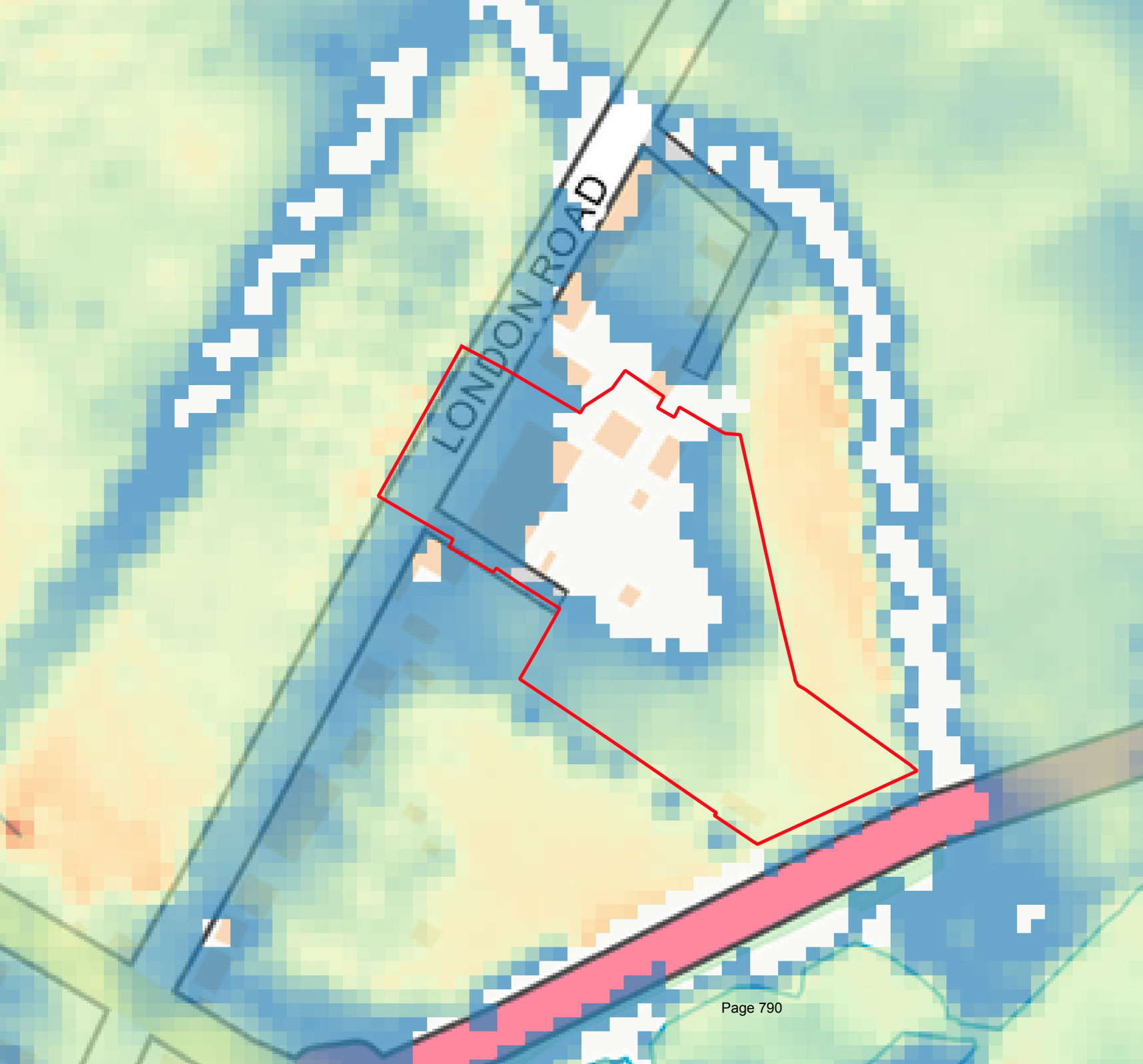
**Document Reference:** 618862-MLM-ZZ-XX-RP-C-0001  
**MLM Reference:** JRC/618862/RA  
**Date:** 2 March 2018

## 7 Climate Change

Due to the uncertainties in flood estimation and expected climate change impacts, it is required that flood flows should include an allowance for increased flow due to climate change as outlined in the NPPF. The latest guidance published in December 2016 provides updated climate change allowances and is now required for all Flood Risk Assessments (FRAs) unless a planning application has already been submitted to the local planning authority.

Following the meeting with the EA on 30 January 2018, it was agreed that the 35% climate change allowance is the most appropriate allowance for managing residual risk to the site. This is the higher central allowance based upon the development proposals at the site.



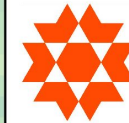


## Legend

— Site Boundary

Maximum Predicted Water Depth (m)

- 0.25
- 0.5
- 0.75
- 1
- 1.25
- 1.5
- 1.75
- 2



**MLM.**  
Group

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**Client: Lochailort St Ives Ltd**

**Project: Former Murketts Garage,  
London Road, St Ives,  
Cambridgeshire**

**Figure Title: Maximum Predicted  
Flood Depth for 1 in 100 Year plus  
climate change event**

## Appendix C - Anglian Water

Wastewater Plan A4 ref: 127689-2



(c) Crown Copyright and database rights 2014 Ordnance Survey 100022432    Date: 29/01/15    Scale: 1:1250    Map Centre: 531093,270743    Data updated: 02/01/15    Our Ref: 127689 - 2    Wastewater Plan A4

This plan is provided by Anglian Water pursuant to its obligations under the Water Industry Act 1991 sections 198 or 199. It must be used in conjunction with any search results attached. The information on this plan is based on data currently recorded but position must be regarded as approximate. Service pipes, private sewers and drains are generally not shown. Users of this map are strongly advised to commission their own survey of the area shown on the plan before carrying out any works. The actual position of all apparatus MUST be established by trial holes. No liability whatsoever, including liability for negligence, is accepted by Anglian Water for any error or inaccuracy or omission, including the failure to accurately record, or record at all, the location of any water main, discharge pipe, sewer or disposal main or any item of apparatus. This information is valid for the date printed. The plan is produced by Anglian Water Services Limited from Ordnance Survey © Crown Copyright, 100022432. This map is to be used for the purposes of viewing the location of Anglian Water plant only. Any other uses of the map data or further copies is not permitted. This notice is not intended to exclude or restrict liability for death or personal injury resulting from negligence.

Foul Sewer		Outfall (Colour denotes effluent type)	
Surface Sewer		Inlet (Colour denotes effluent type)	
Combined Sewer		Manhole (Colour denotes effluent type)	
Final Effluent		Sewage Treatment Works	
Rising Main (Colour denotes effluent type)		Pumping Station	
Private Sewer (Colour denotes effluent type)			
Decommissioned Sewer (Colour denotes effluent type)			

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Murketts garage





# Appendix D - Surface Water Drainage Strategy

Brownfield Calculations





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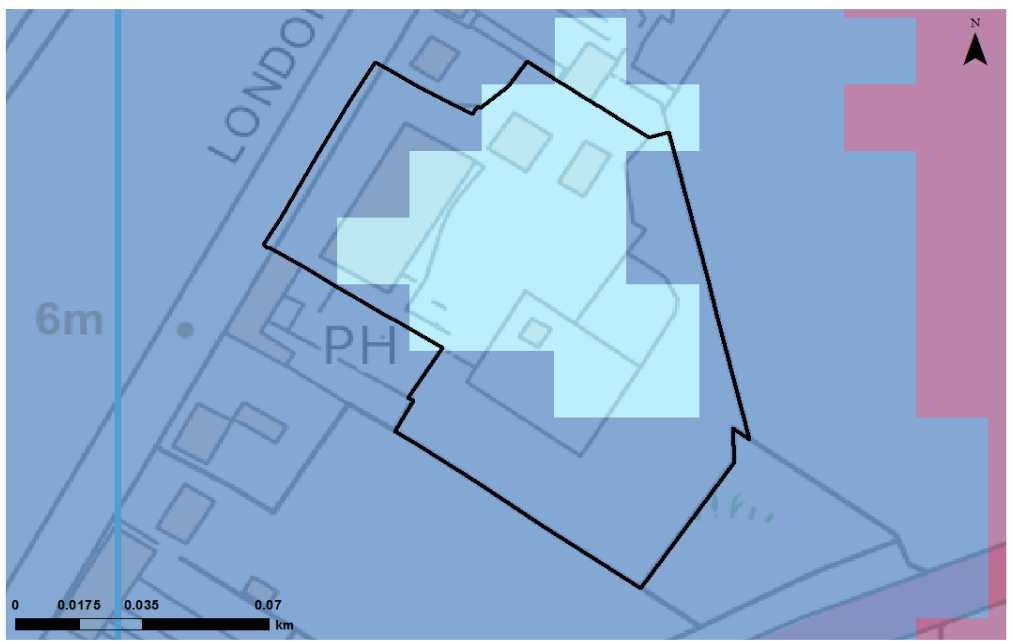
**Former car showroom, London Road, St Ives (SI6)**

<b>OSNGR:</b> 531115,270724	<b>Area:</b> 1.22ha		<b>Brownfield</b>	
<b>Flood Zone Coverage:</b>	<b>FZ3b</b> 0%	<b>FZ3a</b> 52%	<b>FZ2</b> 48%	<b>FZ1</b> 0%

**Sources of flood risk:**  
 The whole of the site is located with the Flood Zones. The higher risk (Flood Zone 3a) is located around the boundary of the site, with the lower risk (Flood Zone 2) towards the centre. The site is shown to not be affected by surface water flooding.

**Exception Test Required?**  
 Yes, if More Vulnerable and Essential Infrastructure development is located in FZ3a and for Highly Vulnerable development located in FZ2.  
 Highly Vulnerable infrastructure should not be permitted within FZ3a

**Flood Zone Map**

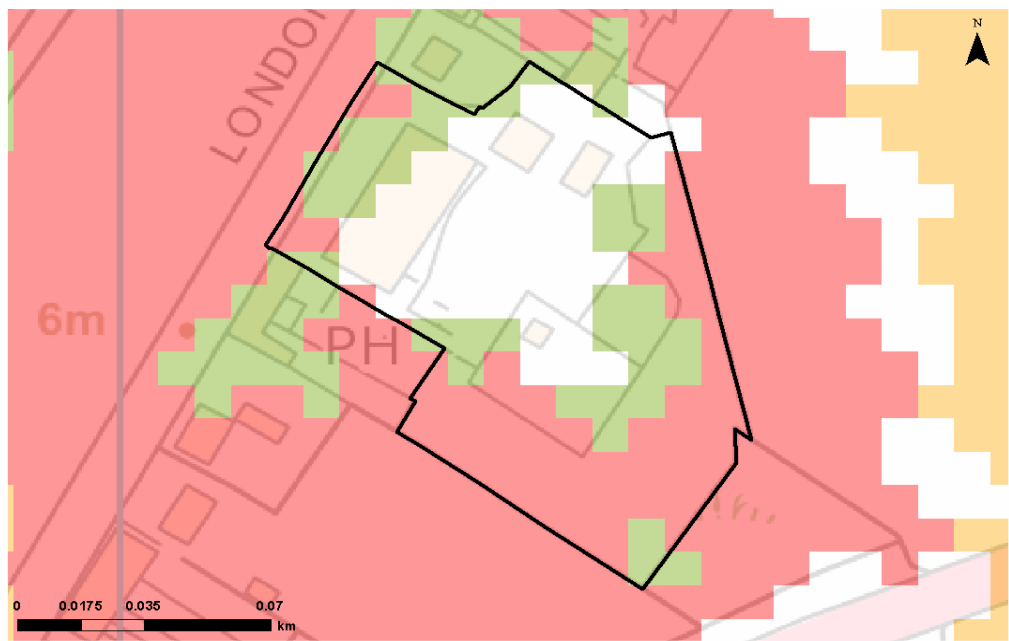


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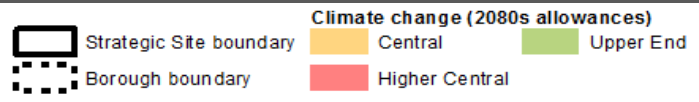
Potential development location	Flood Zone 3b	Flood Zone 3a
Council boundary	Indicative Extent of Flood Zone 3b	Flood Zone 2



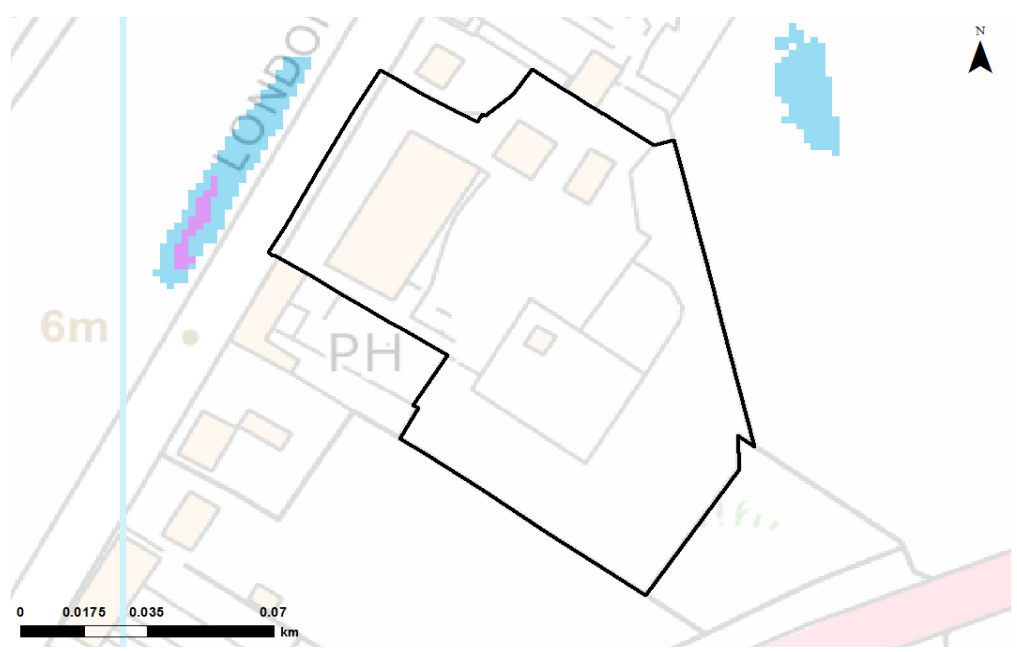
**Climate Change Map**



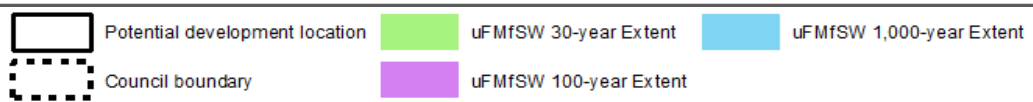
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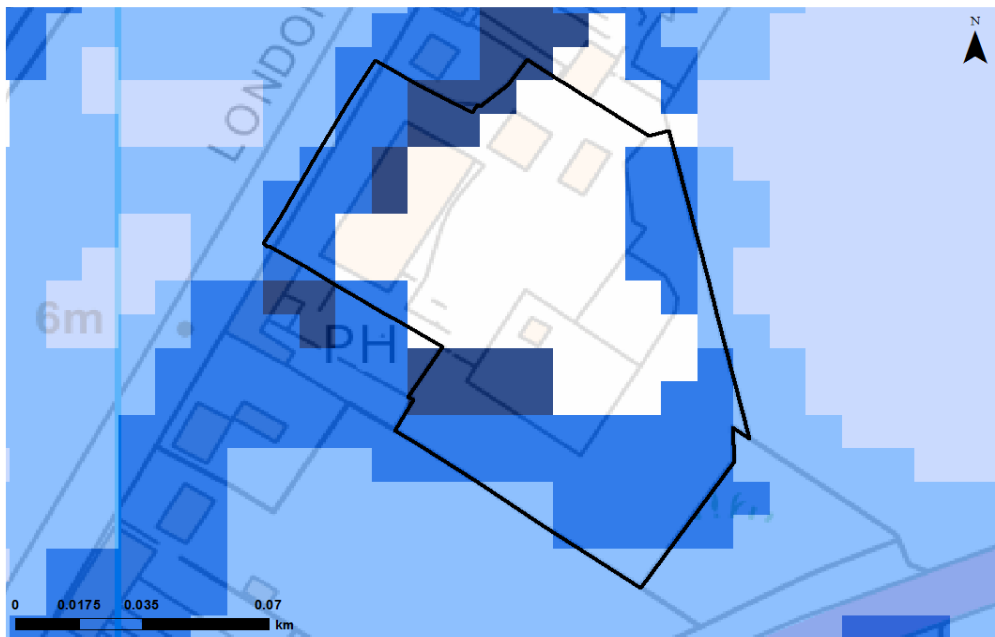
**Surface Water Map**



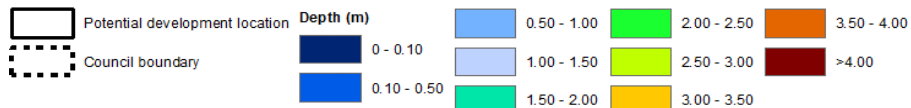
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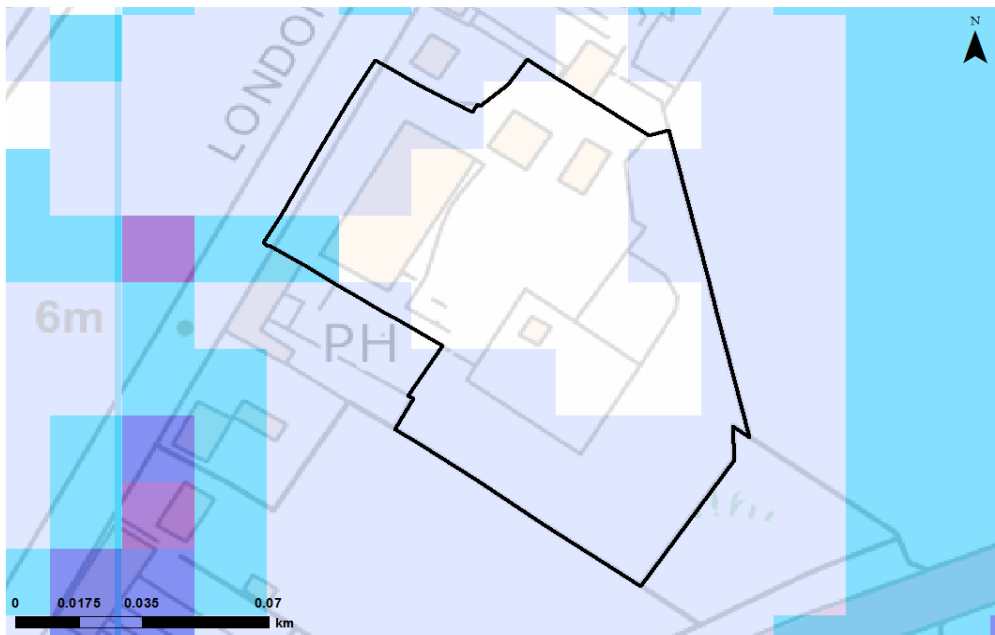
**Depth Map - fluvial flooding (1% Annual exceedance probability)**



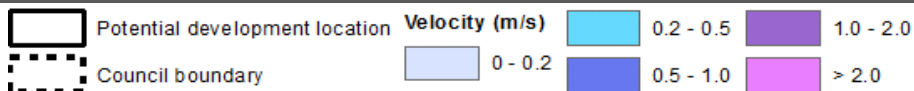
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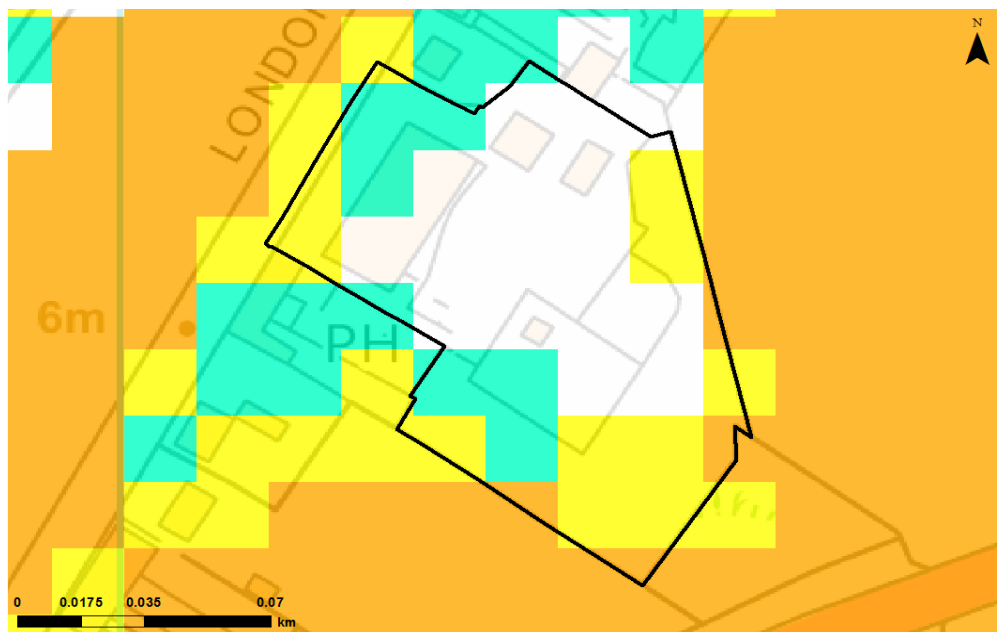
**Velocity Map - fluvial flooding (1% Annual exceedance probability)**



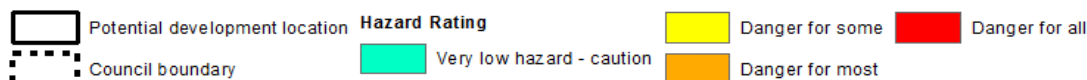
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**Hazard Map - fluvial flooding (1% Annual exceedance probability)**



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**SuDS & the development site:**

SuDS Type	Suitability	Comments
Source Control	Green	Most source control techniques are likely to be suitable. Mapping suggests that permeable paving may have to use non-infiltrating systems given the possible risk both to and from groundwater.
Infiltration	Red	Mapping suggests that there is a high risk of groundwater flooding at this location, therefore it is possible infiltration techniques will not be suitable. This should be confirmed via site investigations to assess the potential for infiltration. If possible, proposed SuDS should be discussed with relevant stakeholders (LPA, LLFA and EA) at an early stage to understand possible constraints given that the site is located within a Source Protection Zone.
Detention	Orange	This option may be feasible provided site slopes are < 5% at the location of the detention feature. A liner may be required to prevent the egress of groundwater and if there are any contamination issues.
Filtration	Orange	This feature is probably suitable provided site slopes are < 5% and the depth to the water table is > 1m. A liner may be required to prevent the egress of groundwater and if there are any contamination issues.
Conveyance	Green	All forms of conveyance are likely to be suitable. Where the slopes are > 5% features should follow contours or utilise check dams to slow flows. A liner may be required to prevent the egress of groundwater and if there are any contamination issues.

Drainage strategies should demonstrate that an appropriate number of treatment stages have been delivered. This depends on the factors such as the type of development, primary source of runoff and likelihood of contamination. Guidance should be sought from the LLFA and other guidance documents such as the CIRIA SuDS Manual (C753).

The site is located within a Source Protection Zone. As such, infiltration techniques should only be used where there are suitable levels of treatment, although it is possible that infiltration may not be permitted. Proposed SuDS should be discussed with relevant stakeholders (LPA, LLFA and EA) at an early stage to understand possible constraints

**Flood Defences:**

The site is protected by a combination of Environment Agency and Local Authority owned embankments which have 1% AEP standard of protection. The condition of the defences ranges between fair and good.

**Emergency Planning:**

This site is covered by the St Ives Flood Warning Area.

**Access & Egress:**

Access to the site is via London Road. In the immediate proximity of the site, this road is affected by fluvial flooding, flooding at the 1% AEP event. North of the site the road is shown to be within the Functional Floodplain. Development will need to ensure plans are in place for the evacuation of occupiers of the site in the event of a flood; should evacuation not be possible, development may need to consider the provision of safe refuge.

**Climate Change:**

Modelling shows little difference in the extent of the 1% AEP event when the 2080s Central, Higher Central and Upper End climate change allowances are applied. However, the depths of flooding may increase.

**Implications for Development:**

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.

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, see section 8.3.4 of SFRA main report. Prospects for effective mitigation would need to be established before taking the site forward.

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.

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.

Broadscale assessment of suitable SuDS has indicated a number of different types may be possible; however, given the size of the site and the proportion of the site at risk from flooding, the type of SuDS system used may be influenced by amount of land available; depending on the system used there may be an impact on the amount of land available for development and the cost of development.

The site is covered by the Environment Agency's Flood Warning Service. Given the potential access and egress issues, development may need to consider provision of safe refuge in the event of occupiers being unable to evacuate. Given the size and location of the site, it is unlikely the site could be used to implement strategic solutions to alleviate flood risk elsewhere in the catchment.

**Guidance for Developers:**

[Mapping in this table is based on results from the Environment Agency's Downstream Ouse 1D-2D model.](#)

At the planning application stage, a site-specific flood risk assessment will be required if any development is located within Flood Zones 2 or 3. Where a site specific FRA has produced modelling outlines which differ from the Flood Map for Planning then a full evidence based review would be required; where this is acceptable to the EA then amendments to the Flood Map for Planning may take place.

Resilience measures will be required if buildings are situated in the flood risk area.

The peak flows on the River Great Ouse should be considered when considering drainage.

Assessment for runoff should include allowance for climate change effects.

New or re-development should adopt exemplar source control SuDS techniques to reduce the risk of frequent low impact flooding due to post-development runoff.

Onsite attenuation schemes would need to be tested against the hydrographs of the River Great Ouse to ensure flows are not exacerbated downstream within the catchment.

Safe access and egress will need to be demonstrated; currently access and egress is affected by surface water flooding from a 1% AEP event.

New development must seek opportunities to reduce overall level of flood risk at the site, for example by:

- o Reducing volume and rate of runoff
- o Relocating development to zones with lower flood risk
- o Creating space for flooding.
- o Green infrastructure should be considered within the mitigation measures for surface water runoff from potential development and consider using Flood Zones 2 and 3 as public open space.

Consultation with the Local Authority and the Environment Agency should be undertaken at an early stage.

# LOCHAILORT ST IVES LIMITED

EAGLE HOUSE  
108-110 JERMYN STREET  
LONDON  
SW1Y 6EE

TEL: 020 3468 4933

Andy Moffat  
Huntingdonshire District Council  
*Pathfinder House*  
St Mary's Street  
Huntingdon  
Cambridgeshire **PE29 3TN**

Tuesday 22<sup>nd</sup> January 2019

Dear Andy

## **Huntingdonshire Local Plan to 2036: Consultation on the Proposed Main Modifications Former *Murketts* car dealership, London Road, St Ives**

Thank you for your notification that the Local Plan Inspector has recommended a number of modifications are made to the submitted *Huntingdonshire Local Plan to 2036* prior to its adoption by the Local Planning Authority.

We do not accept that the deletion of site allocation SI4 (*Former Car Showroom, London Road, St Ives*) is necessary to make the plan sound and consequently, we **object** to proposed main modification 29.

### **Flood risk**

The Environment Agency has constructed modern flood defences which protect a large part of St Ives from flooding, including site SI4. These newly-built defences have been robustly constructed to modern standards and are maintained by the Environment Agency. Consequently, site SI4 should be considered to be in Flood Zone 1, where neither the sequential nor the exception test applies. Having correctly adopted this flood risk classification, the public benefits of the site's regeneration manifestly weigh in substantial favour of its allocation for residential redevelopment.

This is a contaminated brownfield site which has lain derelict for ten years, causing harm to the character and appearance of the Conservation Area. Both the current and the previous owners have been approached on several occasions asking whether the site can come forward for redevelopment.

Given the unusual site-specific demolition and remediation costs, as well as the constraints posed by the high and medium pressure gas mains crossing the site (which preclude any larger-footprint development), the only viable reuse is for residential development. No other site would realise the substantial public benefits of the site's regeneration and consequently, should the Local Authority consider that the Sequential Test ought to be applied, this is clearly met. We would cite planning permission 18/02239/FUL (*Former ATS garage, 22 East Street, St Ives*) as a local example of where similar regeneration benefits in a flood-defended location were such that the Sequential Test was met. The Local Planning Authority's correct assessment of the Sequential Test applies equally to site allocation SI4 as it did to the East Street site.

In terms of the Exception Test, the enclosed *Flood Risk Assessment* and separate *Drainage Strategy* documents have been submitted in support of recent planning application reference 18/02726/FUL on the SI4 site. Both documents have been prepared following extensive liaison with the Environment Agency, who have confirmed (as attached) that both the methodology and the adopted strategy are appropriate. Consequently, the Local Planning Authority can also be confident that the Exception Test has been passed at site SI4.

# LOCHAILORT ST IVES LIMITED

## Summary

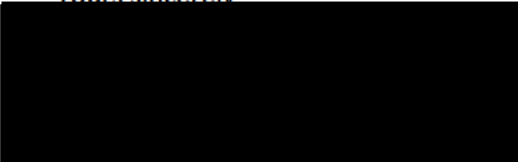
There is no justification or requirement for site allocation SI4 to be deleted in order to make the Plan sound. To the contrary, the public benefits of the site's regeneration for residential development – the only practical and viable reuse – weigh heavily in favour of the site's continued allocation.

The enclosed detailed Flood Risk Assessment and Drainage Strategy documents were not before the Inspector when he recommended that site allocation SI4 be deleted, and neither had planning application 18/02726/FUL been submitted. In light of this additional information, the Local Planning Authority is clearly at full liberty to set aside the Inspector's proposed main modification in respect of site allocation SI4, and reinstate the allocation accordingly. **We would request this course of action.**

We would be happy to discuss the content of this letter with Officers if this would assist.

Kind regards

Yours sincerely



**James Croucher MTP MRTPI**  
**Planning Director**

Enclosures: as set out

## Comment

Consultee	Ms Debbie Mack (56252)
Email Address	[REDACTED]
Company / Organisation	Historic England
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Proposed Main Modifications 2018
Comment by	Historic England (Ms Debbie Mack - 56252)
Comment ID	PMM2018:49
Response Date	29/01/19 10:48
Consultation Point	Proposed Main Modification 30 ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.5
Files	<a href="#">Mack for Historic England_Redacted.pdf</a>

Please tell us whether you support or object to this proposed main modification. Please note: **Support:** if you select support you will be stating that you think this proposed main modification is both **sound** and **legally compliant** . **Object:** if you select object you will be stating that you think this proposed main modification is either **unsound** and/ or is **not legally compliant** .

**Do you**  **Object**

It is important to understand how you think this proposed main modification is not sound. Please refer to the 'Proposed Submission Representations Advice Note' for more information about the options here. Please tick all that apply.

**Do you consider this proposed main modification is not sound because it is not...**

Please enter your representation here. You should say why you either support this proposed main modification or why you think it is not sound and/ or not legally compliant.

Please note: There are no limits on the length of representations but please be as concise as possible, including only that which is necessary to explain your representation. You can support your representation with supporting documents if you wish (see below) but please include clear references and reasoning as to why any attachments support your representation.

**Note: Any representations that rely entirely on supporting documents and state 'See attached report' or similar for this question will not be accepted.**

**Please enter your representation here.**

MM30 RA3 West Station Yard and Northern Mill, Ramsey We note that this policy now includes the caveat that the retention of the existing Northern Mill building to act as local landmark subject to viability. We would highlight the importance of seeking to sustain and enhance heritage assets (whether designated or undesignated) (para 185a and 197 of the NPPF). Paragraph 195 that discusses viability matters relates to designated assets, though many of the same principles apply. We would continue to emphasise the desirability of retaining the Northern Mill building in the first instance.

### **Supporting documents**

If you would like you can support your representation with supporting documents. Please provide a description for any documents you upload and clearly reference them in your representation.

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[Mack for Historic England Redacted.pdf](#)

Please tell us whether changes can be made to address the issue(s) you have identified.

**Can the issue(s) you have identified be addressed by making changes to the proposed main modification?** Yes

Please tell us what changes would address the issue(s) that you have identified.

You should say why these changes will make this proposed main modification sound and/ or legally compliant.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it ( **U** ) and identifying any text to be deleted by striking it through ( **ABC** ).

**What changes would address the issue(s) that you have identified?**

Highlight the importance of seeking to sustain and enhance heritage assets (whether designated or undesignated) (para 185a and 197 of the NPPF). Continue to emphasise the desirability of retaining the Northern Mill building in the first instance.

### **Summary**

Object to Main modification 30. We would highlight the importance of seeking to sustain and enhance heritage assets (para 185a and 197 of the NPPF). Paragraph 195 relates to designated assets, though many of the same principles apply. We would continue to emphasise the desirability of retaining the Northern Mill building in the first instance.



## Comment

Consultee	Mr Graham Moore (34415)
Email Address	[REDACTED]
Company / Organisation	Middle Level Commissioners
Address	[REDACTED] [REDACTED] [REDACTED]
Event Name	Proposed Main Modifications 2018
Comment by	Middle Level Commissioners (Mr Graham Moore - 34415)
Comment ID	PMM2018:72
Response Date	29/01/19 16:22
Consultation Point	Proposed Main Modification 30 ( <a href="#">View</a> )
Status	Processed
Submission Type	Letter
Version	0.11
Files	<a href="#">Middle Level Commissioners_Redacted.pdf</a>

Please tell us whether you support or object to this proposed main modification. Please note: **Support:** if you select support you will be stating that you think this proposed main modification is both **sound** and **legally compliant** . **Object:** if you select object you will be stating that you think this proposed main modification is either **unsound** and/ or is **not legally compliant** .

**Do you**  **Object**

It is important to understand how you think this proposed main modification is not sound. Please refer to the 'Proposed Submission Representations Advice Note' for more information about the options here. Please tick all that apply.

**Do you consider this proposed main modification is not sound because it is not...**

Please say whether you think this proposed main modification is legally compliant. Please refer to the 'Proposed Submission Representations Advice Note' for more information about the issues covered by legal compliance.

**Do you consider this proposed main modification to be legally compliant?**  Not legally compliant

Please enter your representation here. You should say why you either support this proposed main modification or why you think it is not sound and/ or not legally compliant.

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**Note: Any representations that rely entirely on supporting documents and state 'See attached report' or similar for this question will not be accepted.**

**Please enter your representation here.**

Huntingdonshire Local Plan to 2036 Proposed Main Modifications 2018 for Consultation Thank you for your e-mail dated 11th December concerning the above. The content of the above Modification document has been considered and our comments are as follows: MM30 – RA3 West Station Yard & Northern Mill, Ramsey The contents of item F are noted but fail to consider the judgement of the Supreme Court in the Commissioners' favour in 2014 (Manchester Ship Canal v United Utilities 2014) which questioned the right of a sewerage undertaker to discharge sewage, both surface water and treated effluent, to a watercourse. This case established a number of principles and for our purposes established the following:

- The implied right of an undertaker without either the consent of the owner of the watercourse or the exercise of compulsory powers to create new outfalls or increase the discharge through previously constructed outfalls ended in 1991 with the passing of the Water Industry Act 1991.
- Pre-existing outfalls and discharges constructed or made under the pre-existing legislative regime remain legal.
- As far as bodies such as Internal Drainage Boards are concerned, both the right to discharge and the right of a developer to connect to an existing public sewer under Section 106 of the Water Industry Act are "relevant sewerage provisions" and therefore require consent from the Middle Level Commissioners or Internal Drainage Boards where their systems would be adversely affected, in addition to any consents from the sewerage undertaker. In addition, any consents issued by either the Commissioners or associated Boards fully consider the implications of the WFD on its watercourses.

### **Supporting documents**

If you would like you can support your representation with supporting documents. Please provide a description for any documents you upload and clearly reference them in your representation.

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[Middle Level Commissioners\\_Redacted.pdf](#)

### **Summary**

Object to Main Modification 30. The contents of item F are noted but fail to consider the judgement of the Supreme Court in the Commissioners' favour in 2014 (Manchester Ship Canal v United Utilities 2014) which questioned the right of a sewerage undertaker to discharge sewage, both surface water and treated effluent, to a watercourse.

**From:** [DMAdmin](#)  
**To:** [Local Plan](#)  
**Subject:** FW: Huntingdonshire Local Plan to 2036 - Proposed Main Modifications 2018 for Consultation  
**Date:** 29 January 2019 16:22:30

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**From:** Planning [REDACTED]  
**Sent:** 29 January 2019 14:16  
**To:** CRM\_Planning  
**Subject:** Huntingdonshire Local Plan to 2036 - Proposed Main Modifications 2018 for Consultation

Our ref: GM/139/1/Admin HDF LDF, 324/1, 325/1, 333/1, 342/1, 350/, & 357/1

Dear Sirs

**Huntingdonshire Local Plan to 2036**

-

**Proposed Main Modifications 2018 for Consultation**

-

Thank you for your e-mail dated 11<sup>th</sup> December concerning the above.

-

The content of the above Modification document has been considered and our comments are as follows:

MM30 – RA3 West Station Yard & Northern Mill, Ramsey

The contents of item F are noted but fail to consider the judgement of the Supreme Court in the Commissioners' favour in 2014 (Manchester Ship Canal v United Utilities 2014) which questioned the right of a sewerage undertaker to discharge sewage, both surface water and treated effluent, to a watercourse.

This case established a number of principles and for our purposes established the following:

- The implied right of an undertaker without either the consent of the owner of the watercourse or the exercise of compulsory powers to create new outfalls or increase the discharge through previously constructed outfalls ended in 1991 with the passing of the Water Industry Act 1991.
- Pre-existing outfalls and discharges constructed or made under the pre-existing legislative regime remain legal.
- As far as bodies such as Internal Drainage Boards are concerned, both the right to discharge and the right of a developer to connect to an existing public sewer under Section 106 of the Water Industry Act are "relevant sewerage provisions" and therefore require consent from the Middle Level Commissioners or Internal Drainage Boards where their systems would be adversely affected, in addition to any consents from the sewerage undertaker.

In addition, any consents issued by either the Commissioners or associated Boards fully consider the implications of the WFD on its watercourses.

MM33 – WB2 Manor Farm Buildings, Warboys

The Planning Inspector's comment is incorrect as it fails to consider the judgement of the Supreme Court in the Commissioners' favour in 2014 (Manchester Ship Canal v United Utilities 2014) which questioned the right of a sewerage undertaker to discharge sewage, both surface water and treated effluent, to a watercourse.

This case established a number of principles and for our purposes established the following:

- The implied right of an undertaker without either the consent of the owner of the watercourse or the exercise of compulsory powers to create new outfalls or increase the discharge through previously constructed outfalls ended in 1991 with the passing of the Water Industry Act 1991.
- Pre-existing outfalls and discharges constructed or made under the pre-existing legislative regime remain legal.
- As far as bodies such as Internal Drainage Boards are concerned, both the right to discharge and the right of a developer to connect to an existing public sewer under Section 106 of the Water Industry Act are "relevant sewerage provisions" and therefore require consent from the Middle Level Commissioners or Internal Drainage Boards where their systems would be adversely affected, in addition to any consents from the sewerage undertaker.

In addition, any consents issued by either the Commissioners or associated Boards fully consider the implications of the WFD on its watercourses.

Regards

Graham Moore  
Planning Engineer

**Middle Level Commissioners**

85 Whittlesey Road, March, Cambs. PE15 0AH

[REDACTED]

[REDACTED]

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## Comment

<b>Consultee</b>	Ms Debbie Mack (56252)
<b>Email Address</b>	[REDACTED]
<b>Company / Organisation</b>	Historic England
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Proposed Main Modifications 2018
<b>Comment by</b>	Historic England (Ms Debbie Mack - 56252)
<b>Comment ID</b>	PMM2018:51
<b>Response Date</b>	29/01/19 10:53
<b>Consultation Point</b>	Proposed Main Modification 31 ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Email
<b>Version</b>	0.5
<b>Files</b>	<a href="#">Mack for Historic England_Redacted.pdf</a>

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**Do you**  **Object**

It is important to understand how you think this proposed main modification is not sound. Please refer to the 'Proposed Submission Representations Advice Note' for more information about the options here. Please tick all that apply.

**Do you consider this proposed main modification is not sound because it is not...**

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**Note: Any representations that rely entirely on supporting documents and state 'See attached report' or similar for this question will not be accepted.**

**Please enter your representation here.**

MM31 SM2 Newlands, St Ives Road, Somersham We welcome the addition of a reference to the nearby listed Somersham Hosue and its setting. Rather than simply stating that the development should 'acknowledge the listed building and its setting', we recommend that it should also preserve the listed building and its setting in line with both legislation and policy. We suggest the following wording: d. high quality development that preserves and acknowledges the nearby listed Somersham House and its setting As it happens, we had specifically requested reference to Somersham House and the Conservation Area in relation to policy SM3 The Pasture. We are disappointed that this has not been included as a proposed modification.

### **Supporting documents**

If you would like you can support your representation with supporting documents. Please provide a description for any documents you upload and clearly reference them in your representation.

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[Mack for Historic England Redacted.pdf](#)

Please tell us whether changes can be made to address the issue(s) you have identified.

**Can the issue(s) you have identified be addressed by making changes to the proposed main modification?** Yes

Please tell us what changes would address the issue(s) that you have identified.

You should say why these changes will make this proposed main modification sound and/ or legally compliant.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it ( **U** ) and identifying any text to be deleted by striking it through ( **ABC** ).

**What changes would address the issue(s) that you have identified?**

Following wording suggested:d. high quality development that preserves and acknowledges the nearby listed Somersham House and its setting

### **Summary**

Main Modification 31. Welcome the addition of a reference to the nearby listed Somersham Hosue and its setting, however it isrecommnd that it should also preserve the listed building and its setting in line with both legislation and policy. Following wording suggested: d. high quality development that preserves and acknowledges the nearby listed Somersham House and its setting

## Comment

<b>Consultee</b>	Yvonne Gauci (1151864)
<b>Address</b>	[REDACTED]
<b>Event Name</b>	Proposed Main Modifications 2018
<b>Comment by</b>	Yvonne Gauci (1151864)
<b>Comment ID</b>	PMM2018:22
<b>Response Date</b>	15/01/19 14:36
<b>Consultation Point</b>	Proposed Main Modification 32 ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Letter
<b>Version</b>	0.5
<b>Files</b>	<a href="#">Gauci MM32_Redacted.pdf</a>

Please tell us whether you support or object to this proposed main modification. Please note: **Support:** if you select support you will be stating that you think this proposed main modification is both **sound** and **legally compliant** . **Object:** if you select object you will be stating that you think this proposed main modification is either **unsound** and/ or is **not legally compliant** .

**Do you**  Support

It is important to understand how you think this proposed main modification is not sound. Please refer to the 'Proposed Submission Representations Advice Note' for more information about the options here. Please tick all that apply.

### **Do you consider this proposed main modification is not sound because it is not...**

Please enter your representation here. You should say why you either support this proposed main modification or why you think it is not sound and/ or not legally compliant.

Please note: There are no limits on the length of representations but please be as concise as possible, including only that which is necessary to explain your representation. You can support your representation with supporting documents if you wish (see below) but please include clear references and reasoning as to why any attachments support your representation.

**Note: Any representations that rely entirely on supporting documents and state 'See attached report' or similar for this question will not be accepted.**

**Please enter your representation here.**



I would like to support the proposal to remove site SM5 East of Robert Avenue, Somersham from the Huntingdonshire Local Plan to 2036 due to the inaccessibility of the site and the negative impact this development would have on the local environment.

### **Summary**

Supports the removal of SM5 East of Robert Avenue, Somersham.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_



15 January 2019

\_\_\_\_\_  
\_\_\_\_\_

Huntingdonshire District Council  
Planning Services  
The Inspector for Planning Modifications  
Pathfinder House  
St Mary's Street  
Huntingdon  
PE29 3TN

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Re:Huntingdonshire Local Plan to 2036  
Proposed Main Modifications 2018 for Consultation  
Proposed Main Modification 32

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Dear Inspector,

I would like to support the proposal to remove site SM5 East of Robert Avenue, Somersham from the Huntingdonshire Local Plan to 2036 due to the inaccessibility of the site and the negative impact this development would have on the local environment.

\_\_\_\_\_

Thank you.

Yours sincerely,



Yvonne Gauci  
ID : 1151864

\_\_\_\_\_

## Comment

**Consultee** Mr Paul Grace (1147551)  
**Email Address** [REDACTED]  
**Address** [REDACTED]  
**Event Name** Proposed Main Modifications 2018  
**Comment by** Mr Paul Grace (1147551)  
**Comment ID** PMM2018:8  
**Response Date** 15/01/19 19:17  
**Consultation Point** Proposed Main Modification 32 ([View](#))  
**Status** Processed  
**Submission Type** Web  
**Version** 0.3

Please tell us whether you support or object to this proposed main modification. Please note: **Support:** if you select support you will be stating that you think this proposed main modification is both **sound** and **legally compliant** . **Object:** if you select object you will be stating that you think this proposed main modification is either **unsound** and/ or is **not legally compliant** .

**Do you** Support

It is important to understand how you think this proposed main modification is not sound. Please refer to the 'Proposed Submission Representations Advice Note' for more information about the options here. Please tick all that apply.

### **Do you consider this proposed main modification is not sound because it is not...**

Please enter your representation here. You should say why you either support this proposed main modification or why you think it is not sound and/ or not legally compliant.

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**Note: Any representations that rely entirely on supporting documents and state 'See attached report' or similar for this question will not be accepted.**

**Please enter your representation here.**

I support the proposal to remove site SM5 East of Robert Avenue from the Huntingdonshire Local Plan to 2036. Good sense has prevailed in preventing this site from being developed. The areas adjacent to the site are designated nature reserves. These areas have been developed into nature reserves over 40 years and are as a result of hard work by many villagers have become an asset to not only Somersham but also to surrounding villages. To allow this land to be built on would be disastrous for the nature reserves. To increase the number of properties in Somersham would create more vehicles using the two junctions at Parkhall Road and Feofees Road which are already overstretched. The land is open countryside and any development would impinge on it. I fully support the stance of Somersham Parish Council and HDC in removing this site from the local plan and also the action of the Inspector in recognising the issues should this site have been included.

## **Summary**

Support Main Modification 32. The proposed development would increase traffic on roads through the village that are already congested at peak times. The loss of habitat next to the local nature reserve would have a negative impact and is an asset to not only Somersham but also to surrounding villages.

## Comment

<b>Consultee</b>	Mr Robin Riordan (1150020)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Proposed Main Modifications 2018
<b>Comment by</b>	Mr Robin Riordan (1150020)
<b>Comment ID</b>	PMM2018:26
<b>Response Date</b>	25/01/19 13:07
<b>Consultation Point</b>	Proposed Main Modification 32 ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Letter
<b>Version</b>	0.7
<b>Files</b>	<a href="#">Riordan letter_Redacted.pdf</a>

Please tell us whether you support or object to this proposed main modification. Please note: **Support:** if you select support you will be stating that you think this proposed main modification is both **sound** and **legally compliant** . **Object:** if you select object you will be stating that you think this proposed main modification is either **unsound** and/ or is **not legally compliant** .

**Do you**  Support

It is important to understand how you think this proposed main modification is not sound. Please refer to the 'Proposed Submission Representations Advice Note' for more information about the options here. Please tick all that apply.

### **Do you consider this proposed main modification is not sound because it is not...**

Please enter your representation here. You should say why you either support this proposed main modification or why you think it is not sound and/ or not legally compliant.

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**Note: Any representations that rely entirely on supporting documents and state 'See attached report' or similar for this question will not be accepted.**

### **Please enter your representation here.**

I fully support Huntingdon District Council's decision to remove the proposed development site MM32 SM5 Land East of Robert Avenue and paragraphs 13.83 to 13.89 from the Huntingdonshire Local Plan to 2036 on the grounds that the landowner does not own access to the site. Further, development of the land East of Robert Avenue would fail to meet several Sustainability Assessment Objectives. It is a Greenfield site currently actively used for agriculture where development would be detrimental due to its proximity to open countryside. Hence the development would fail to meet Objectives 1 and 6. The site is immediately adjacent to a designated Wildlife Site and to Somersham Lake, so it fails to meet Objective 5. There is no direct access onto a suitable access road, which would result in severe transport infrastructure constraints. With only 9.1m between property boundaries, Robert Avenue is a quiet cul-de-sac which is too narrow to provide access for a development of this size because the Huntingdonshire Design Guide specifies a minimum corridor width of 10.3m. Additionally, a development of this size would severely increase traffic levels which would require use of The Trundle, Parkhall Road or Feoffees Road for access through Somersham (B1086). Both of these roads are residential with substantial on street parking and are already severely congested at peak times. Overall, these severe transport infrastructure constraints mean that the site fails to meet Objective 21. In conclusion Somersham Parish Council have re-iterated their opposition to the development of this site and their unwillingness to sell valuable community recreation land for any such purpose. The proposal fails on a number of factors and should not be considered for development again.

### **Supporting documents**

If you would like you can support your representation with supporting documents. Please provide a description for any documents you upload and clearly reference them in your representation.

If you want to refer to a publication that is available elsewhere or that is subject to copyright that you do not control please provide a link to a website where it is available or give a full reference (including author(s), full title and date of publication) in your comment.

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To upload more than one document first select your first document and upload it, then save your comment using the button at the bottom of the page. You can then select another document to upload.

[Riordan letter\\_Redacted.pdf](#)

### **Summary**

Support Main modification 32. Retention of the site would fail to meet Sustainability Appraisal Objectives 1, 5, and 21. The field is used for agriculture, it is in open countryside and adjacent to a designated wildlife site. Robert Avenue and connecting roads are too narrow for increased traffic. The Parish Council are unwilling to sell their portion of land.

Mr R D Riordan

Somersham  
Cambridgeshire

23rd January 2019

Inspector on the Huntingdon Local Plan Examination  
C/o Annette Feeney,  
Huntingdonshire Local Plan Programme Officer,  
Pathfinder House  
St Mary's Street  
Huntingdon PE29 3TN

Dear Sir,

**Huntingdonshire Local Plan Matter 10 Proposed site allocations Key Service Centres - Somersham**

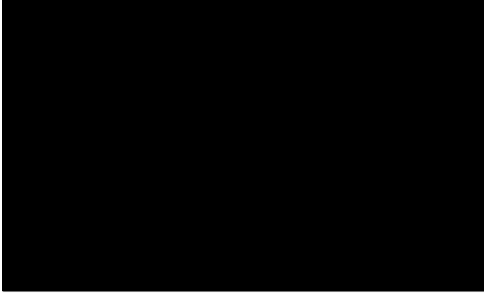
I fully support Huntingdon District Council's decision to remove the proposed development site MM32 SM5 Land East of Robert Avenue and paragraphs 13.83 to 13.89 from the Huntingdonshire Local Plan to 2036 on the grounds that the landowner does not own access to the site.

Further, development of the land East of Robert Avenue would fail to meet several Sustainability Assessment Objectives. It is a Greenfield site currently actively used for agriculture where development would be detrimental due to its proximity to open countryside. Hence the development would fail to meet Objectives 1 and 6. The site is immediately adjacent to a designated Wildlife Site and to Somersham Lake, so it fails to meet Objective 5.

There is no direct access onto a suitable access road, which would result in severe transport infrastructure constraints. With only 9.1m between property boundaries, Robert Avenue is a quiet cul-de-sac which is too narrow to provide access for a development of this size because the Huntingdonshire Design Guide specifies a minimum corridor width of 10.3m. Additionally, a development of this size would severely increase traffic levels which would require use of The Trundle, Parkhall Road or Feoffees Road for access through Somersham (B1086). Both of these roads are residential with substantial on street parking and are already severely congested at peak times. Overall, these severe transport infrastructure constraints mean that the site fails to meet Objective 21.

**In conclusion Somersham Parish Council have re-iterated their opposition to the development of this site and their unwillingness to sell valuable community recreation land for any such purpose. The proposal fails on a number of factors and should not be considered for development again.**

**Yours sincerely,**



**R D Riordan**



## Comment

Consultee	Mr Peter Scarisbrick (1150466)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Proposed Main Modifications 2018
Comment by	Mr Peter Scarisbrick (1150466)
Comment ID	PMM2018:11
Response Date	21/01/19 19:47
Consultation Point	Proposed Main Modification 32 ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.4

Please tell us whether you support or object to this proposed main modification. Please note: **Support:** if you select support you will be stating that you think this proposed main modification is both **sound** and **legally compliant** . **Object:** if you select object you will be stating that you think this proposed main modification is either **unsound** and/ or is **not legally compliant** .

**Do you** Support

It is important to understand how you think this proposed main modification is not sound. Please refer to the 'Proposed Submission Representations Advice Note' for more information about the options here. Please tick all that apply.

### **Do you consider this proposed main modification is not sound because it is not...**

Please enter your representation here. You should say why you either support this proposed main modification or why you think it is not sound and/ or not legally compliant.

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**Note: Any representations that rely entirely on supporting documents and state 'See attached report' or similar for this question will not be accepted.**

**Please enter your representation here.**

I support the removal of SM5 from the Huntingdon Local Plan to 2036. The proposed development would have increased traffic on roads through the village that are already congested at peak times. The loss of habitat next to the local nature reserve would have a negative impact on the wildlife of the reserve.

### **Summary**

Support Main Modification 32. The proposed development would increase traffic on roads through the village that are already congested at peak times. The loss of habitat next to the local nature reserve would have a negative impact on the wildlife of the reserve.

## Comment

Consultee	Penny Bryant (34953)
Email Address	[REDACTED]
Company / Organisation	Somersham Parish Council
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Proposed Main Modifications 2018
Comment by	Somersham Parish Council ( Penny Bryant - 34953)
Comment ID	PMM2018:34
Response Date	28/01/19 15:06
Consultation Point	Proposed Main Modification 32 ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.3

Please tell us whether you support or object to this proposed main modification. Please note: **Support:** if you select support you will be stating that you think this proposed main modification is both **sound** and **legally compliant** . **Object:** if you select object you will be stating that you think this proposed main modification is either **unsound** and/ or is **not legally compliant** .

**Do you**  Support

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**Do you consider this proposed main modification is not sound because it is not...**

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**Please enter your representation here.**

The Council is supportive of the local residents who have made strong and continuous objections to development on the field identified as SM5. Councillors object to this site as it will impinge on the open countryside, it has poor road access making it unsuitable for additional domestic traffic let alone construction traffic. Therefore, Somersham Parish Council strongly supports the recommendation to REMOVE from the Local Plan to 2036 the land identified as SM5 East of Robert Avenue

**Summary**

Support Main Modification 32. The allocation would impinge on the open countryside and has poor road access making it unsuitable for additional domestic traffic let alone construction traffic

## Comment

<b>Consultee</b>	Mrs Michelle Wormald (1196875)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Proposed Main Modifications 2018
<b>Comment by</b>	Mrs Michelle Wormald (1196875)
<b>Comment ID</b>	PMM2018:10
<b>Response Date</b>	21/01/19 14:05
<b>Consultation Point</b>	Proposed Main Modification 32 ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.4
<b>Files</b>	<a href="#">Robert Avenue - habitats.pdf</a>

Please tell us whether you support or object to this proposed main modification. Please note: **Support:** if you select support you will be stating that you think this proposed main modification is both **sound** and **legally compliant** . **Object:** if you select object you will be stating that you think this proposed main modification is either **unsound** and/ or is **not legally compliant** .

**Do you**  Support

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### **Do you consider this proposed main modification is not sound because it is not...**

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**Note: Any representations that rely entirely on supporting documents and state 'See attached report' or similar for this question will not be accepted.**

### **Please enter your representation here.**

I note that the development proposal for East for Robert Avenue was removed from the Local Plan 2026 in 2018, we I support. However recently the Parish and community have been informed that the landowner is pushing for its inclusion back into the plan. As a resident and parent I am concerned and this move by the landowner, considering the reasons for the removal in the first instance. The Nature Reserve is a quite area for wildlife, habitats and recreation. The proposal would remove trees and undergrowth, damage species pathways and increase noise and pollution in the area. This is not in keeping with Chapter 8 of the Plan Conserving and Enhancing the Environment. Damage to the Nature reserve and its species will have a negative effect on the species diversity levels of the Nature Reserve and to the well being of the residents of Somersham. The PDF map attached from the Government site Magic confirms the proposed site to be part of the Woodland Priority Habitat network and other habitats.

### **Supporting documents**

If you would like you can support your representation with supporting documents. Please provide a description for any documents you upload and clearly reference them in your representation.

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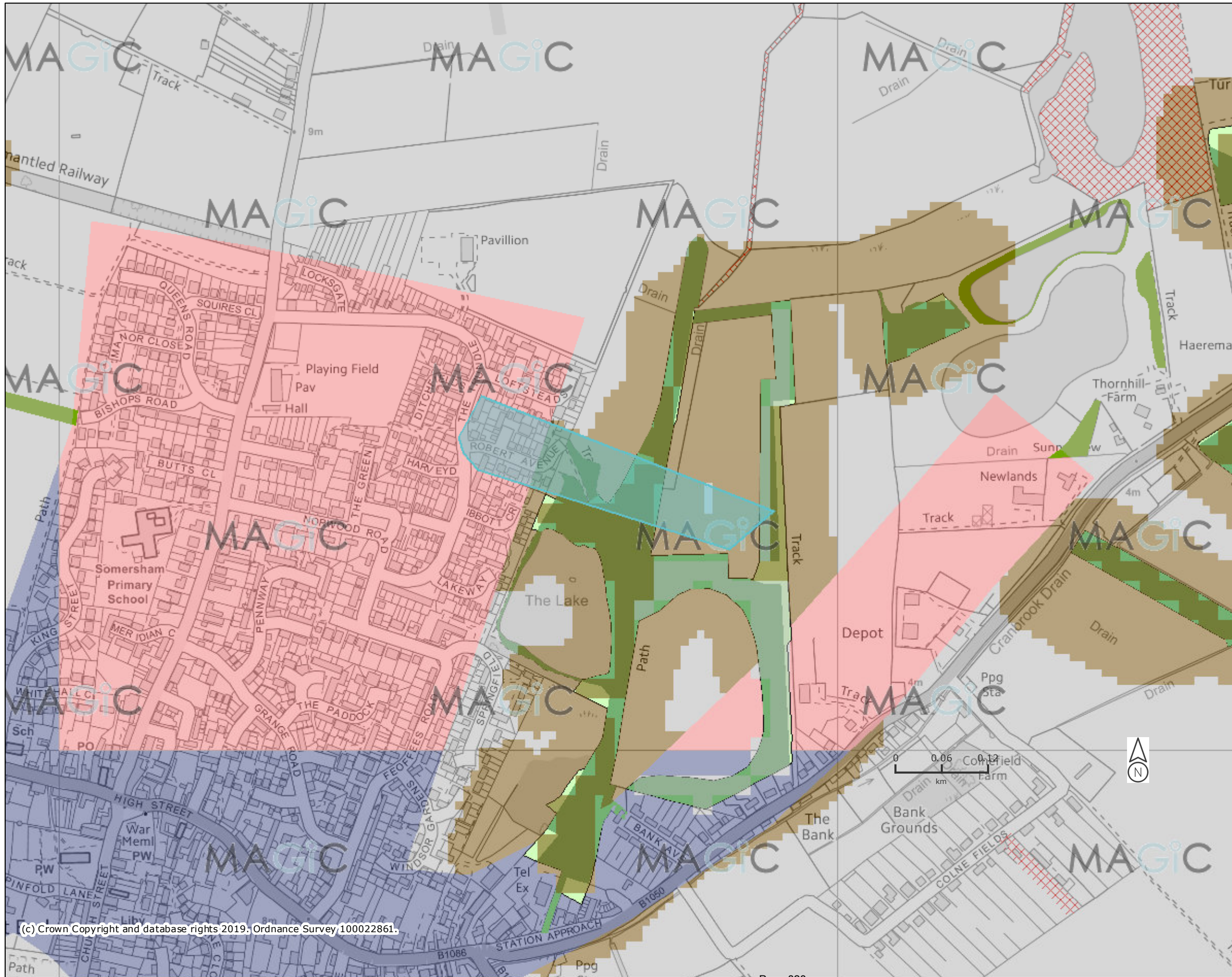
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To upload more than one document first select your first document and upload it, then save your comment using the button at the bottom of the page. You can then select another document to upload.

[Robert Avenue - habitats.pdf](#)

### **Summary**

Support Main Modification 32. The loss of habitat next to the local nature reserve would have a negative impact on the wildlife of the reserve and recreational value of the site. This is not in keeping with the objectives of Chapter 8 of the Plan. The PDF map attached confirms the proposed site to be part of the Woodland Priority Habitat network and other habitats.



**Legend**

- Ramsar Sites (England)
- Sites of Special Scientific Interest (England)
- Special Areas of Conservation (England)
- Special Protection Areas (England)

**Woodland Priority Habitat Network (England)**

- High Spatial Priority
- Lower Spatial Priority

**Woodland Improvement (England)**

- High Spatial Priority
- Lower Spatial Priority
- Priority Habitat Inventory - Coastal Saltmarsh (England)
- Priority Habitat Inventory - Coastal Sand Dunes (England)
- Priority Habitat Inventory - Coastal Vegetated Shingle (England)
- Priority Habitat Inventory - Maritime Cliffs and Slopes (England)
- Priority Habitat Inventory - Mudflats (England)
- Priority Habitat Inventory - Saline Lagoons (England)
- Priority Habitat Inventory - Calaminarian Grassland (England)
- Priority Habitat Inventory - Coastal and Floodplain Grazing Marsh (England)
- Priority Habitat Inventory - Good quality semi-improved grassland (Non Priority) (England)
- Priority Habitat Inventory - Lowland Calcareous Grassland (England)
- Priority Habitat Inventory - Lowland Dry Acid Grassland (England)
- Priority Habitat Inventory - Lowland Meadows (England)
- Priority Habitat Inventory - Purple Moor Grass and Rush Pasture (England)
- Priority Habitat Inventory - Upland Calcareous Grassland (England)
- Priority Habitat Inventory - Upland Hay Meadows (England)
- Refined Coastal and Floodplain Grazing Marsh (England)

Projection = OSGB36

xmin = 535900  
 ymin = 278000  
 xmax = 537600  
 ymax = 278700

Map produced by MAGIC on 21 January, 2019.  
 Copyright resides with the data suppliers and the map must not be reproduced without their permission. Some information in MAGIC is a snapshot of the information that is being maintained or continually updated by the originating organisation. Please refer to the metadata for details as information may be illustrative or representative rather than definitive at this stage.

## Comment

<b>Consultee</b>	Mrs Michelle Wormald (1196875)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Proposed Main Modifications 2018
<b>Comment by</b>	Mrs Michelle Wormald (1196875)
<b>Comment ID</b>	PMM2018:9
<b>Response Date</b>	21/01/19 14:04
<b>Consultation Point</b>	Proposed Main Modification 32 ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.4
<b>Files</b>	<a href="#">Robert Ave flood risk 1.PNG</a>

Please tell us whether you support or object to this proposed main modification. Please note: **Support:** if you select support you will be stating that you think this proposed main modification is both **sound** and **legally compliant** . **Object:** if you select object you will be stating that you think this proposed main modification is either **unsound** and/ or is **not legally compliant** .

**Do you**  Support

It is important to understand how you think this proposed main modification is not sound. Please refer to the 'Proposed Submission Representations Advice Note' for more information about the options here. Please tick all that apply.

### **Do you consider this proposed main modification is not sound because it is not...**

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### **Please enter your representation here.**

I note that the development proposal for East for Robert Avenue was removed from the Local Plan 2026 in 2018, we I support. However recently the Parish and community have been informed that the landowner is pushing for its inclusion back into the plan. As a resident and parent I am concerned and this move by the landowner, considering the reasons for the removal in the first instance. Note that Somersham primary school is at significant risk due to continued under performance and it being at capacity. There are no school places for the children of the proposed houses. This data can be sourced directly from the school. The congestion and number of vehicles parked across the village has increased significantly over the last 7 years. It is nearly impossible to move in or out of the village in the morning and afternoons. The school buses and dust carts cannot get through the volume of traffic and parked vehicles. More importantly Robert Avenue is a cul-de-sac not a thorough fair. The Avenue would become noisy and un safe with an additional 50 cars (assumed a minimum of 2 cars per household) moving through it everyday. The increased dust and noise will adversely affect the residents on the Avenue. The Nature Reserve is a quite area for wildlife, habitats and recreation. The proposal would remove trees and undergrowth, damage species pathways and increase noise and pollution in the area. This is not in keeping with Chapter 8 of the Plan Conserving and Enhancing the Environment. Damage to the Nature reserve and its species will have a negative effect on the species diversity levels of the Nature Reserve and to the well being of the residents of Somersham. The PDF map attached from the Government site Magic confirms the proposed site to be part of the Woodland Priority Habitat network and other habitats. It is established that there is a risk of surface water flooding in the Avenue and this will extend into the proposed development site. Evidence previously submitted shows this flood risk (Environment Agency files) and forms part of these objections to including the site in the Plan again. Increasing the hard surfaces in this area will increase rain water and potable water run off, this increasing the pressure on the struggling capacity of the surface water system and brook in this area.

### **Supporting documents**

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[Robert Ave flood risk 1.PNG](#)

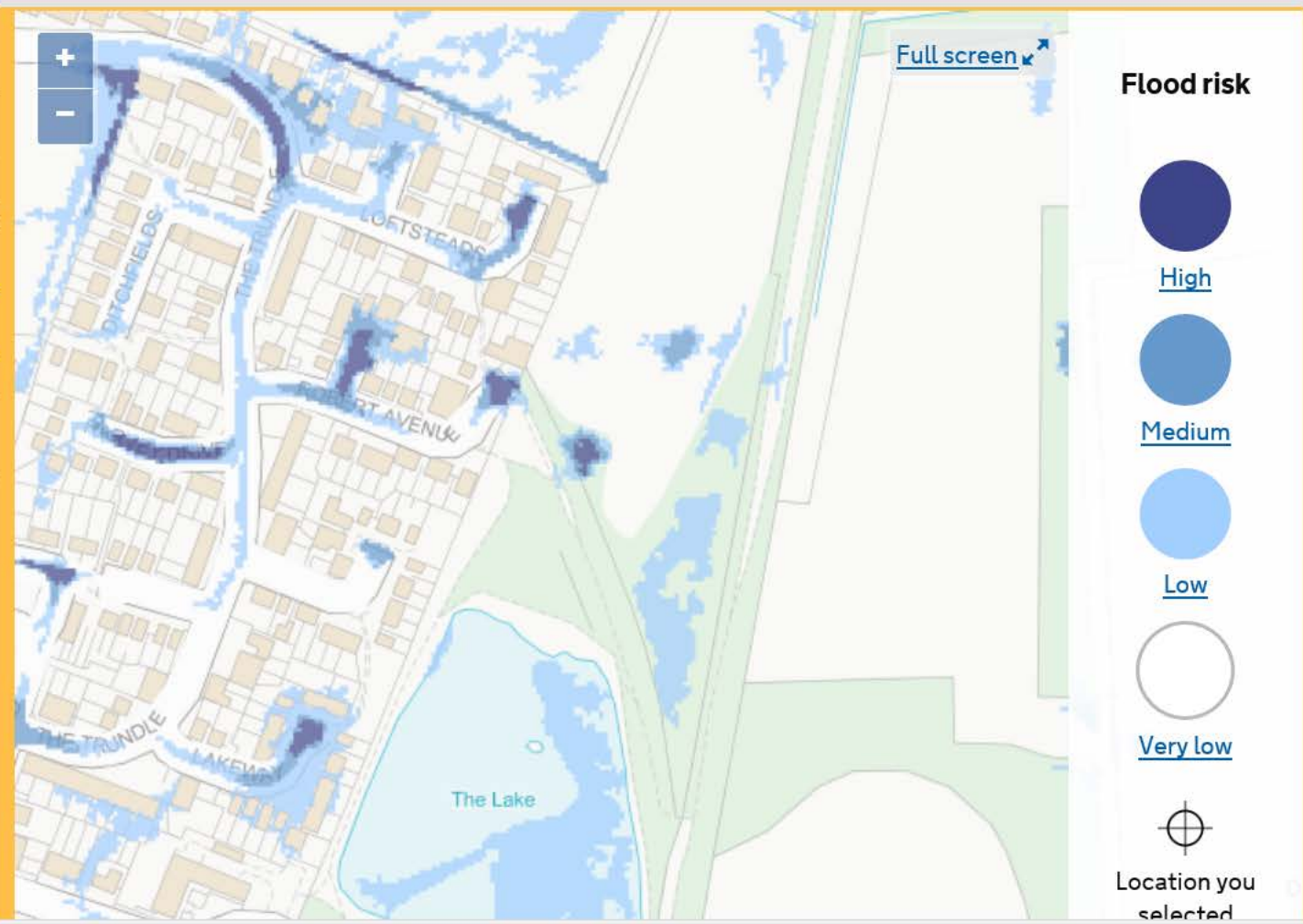
### **Summary**

Support Main Modification 32. The proposed development would increase traffic on roads through the village that are already congested at peak times. Robert Avenue would become noisy and un safe with an additional 50 cars moving through it everyday. The loss of habitat next to the local nature reserve would have a negative impact on the wildlife of the reserve and recreational value of the site. This is not in keeping with the objectives of Chapter 8 of the Plan. The school is at capacity there are no school places for the children of the proposed houses. There is a risk of surface water flooding. Environment Agency map attached to support this.

Basic view  Detailed view

Location

- Flood risk from rivers or the sea
  - Extent of flooding
- Flood risk from surface water
  - Extent of flooding
- Flood risk from reservoirs
  - Extent of flooding



- Flood risk**
- High
  - Medium
  - Low
  - Very low
  - Location you selected

## Comment

Consultee	Mr Graham Moore (34415)
Email Address	[REDACTED]
Company / Organisation	Middle Level Commissioners
Address	[REDACTED] [REDACTED] [REDACTED]
Event Name	Proposed Main Modifications 2018
Comment by	Middle Level Commissioners (Mr Graham Moore - 34415)
Comment ID	PMM2018:73
Response Date	29/01/19 16:22
Consultation Point	Proposed Main Modification 33 ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.5
Files	<a href="#">Middle Level Commissioners_Redacted.pdf</a>

Please tell us whether you support or object to this proposed main modification. Please note: **Support:** if you select support you will be stating that you think this proposed main modification is both **sound** and **legally compliant** . **Object:** if you select object you will be stating that you think this proposed main modification is either **unsound** and/ or is **not legally compliant** .

**Do you**  **Object**

It is important to understand how you think this proposed main modification is not sound. Please refer to the 'Proposed Submission Representations Advice Note' for more information about the options here. Please tick all that apply.

**Do you consider this proposed main modification is not sound because it is not...**

Please say whether you think this proposed main modification is legally compliant. Please refer to the 'Proposed Submission Representations Advice Note' for more information about the issues covered by legal compliance.

**Do you consider this proposed main modification to be legally compliant?**  Not legally compliant

Please enter your representation here. You should say why you either support this proposed main modification or why you think it is not sound and/ or not legally compliant.

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**Note: Any representations that rely entirely on supporting documents and state 'See attached report' or similar for this question will not be accepted.**

**Please enter your representation here.**

MM33 – WB2 Manor Farm Buildings, Warboys The Planning Inspector's comment is incorrect as it fails to consider the judgement of the Supreme Court in the Commissioners' favour in 2014 (Manchester Ship Canal v United Utilities 2014) which questioned the right of a sewerage undertaker to discharge sewage, both surface water and treated effluent, to a watercourse. This case established a number of principles and for our purposes established the following: • The implied right of an undertaker without either the consent of the owner of the watercourse or the exercise of compulsory powers to create new outfalls or increase the discharge through previously constructed outfalls ended in 1991 with the passing of the Water Industry Act 1991. • Pre-existing outfalls and discharges constructed or made under the pre-existing legislative regime remain legal. • As far as bodies such as Internal Drainage Boards are concerned, both the right to discharge and the right of a developer to connect to an existing public sewer under Section 106 of the Water Industry Act are "relevant sewerage provisions" and therefore require consent from the Middle Level Commissioners or Internal Drainage Boards where their systems would be adversely affected, in addition to any consents from the sewerage undertaker. In addition, any consents issued by either the Commissioners or associated Boards fully consider the implications of the WFD on its watercourses.

### **Supporting documents**

If you would like you can support your representation with supporting documents. Please provide a description for any documents you upload and clearly reference them in your representation.

If you want to refer to a publication that is available elsewhere or that is subject to copyright that you do not control please provide a link to a website where it is available or give a full reference (including author(s), full title and date of publication) in your comment.

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To upload more than one document first select your first document and upload it, then save your comment using the button at the bottom of the page. You can then select another document to upload.

[Middle Level Commissioners\\_Redacted.pdf](#)

### **Summary**

Object to Main Modification 33. The Planning Inspector's comment is incorrect as it fails to consider the judgement of the Supreme Court in the Commissioners' favour in 2014 (Manchester Ship Canal v United Utilities 2014) which questioned the right of a sewerage undertaker to discharge sewage, both surface water and treated effluent, to a watercourse.

**From:** [DMAdmin](#)  
**To:** [Local Plan](#)  
**Subject:** FW: Huntingdonshire Local Plan to 2036 - Proposed Main Modifications 2018 for Consultation  
**Date:** 29 January 2019 16:22:30

---

---

**From:** Planning [REDACTED]  
**Sent:** 29 January 2019 14:16  
**To:** CRM\_Planning  
**Subject:** Huntingdonshire Local Plan to 2036 - Proposed Main Modifications 2018 for Consultation

Our ref: GM/139/1/Admin HDF LDF, 324/1, 325/1, 333/1, 342/1, 350/, & 357/1

Dear Sirs

**Huntingdonshire Local Plan to 2036**

-

**Proposed Main Modifications 2018 for Consultation**

-

Thank you for your e-mail dated 11<sup>th</sup> December concerning the above.

-

The content of the above Modification document has been considered and our comments are as follows:

MM30 – RA3 West Station Yard & Northern Mill, Ramsey

The contents of item F are noted but fail to consider the judgement of the Supreme Court in the Commissioners' favour in 2014 (Manchester Ship Canal v United Utilities 2014) which questioned the right of a sewerage undertaker to discharge sewage, both surface water and treated effluent, to a watercourse.

This case established a number of principles and for our purposes established the following:

- The implied right of an undertaker without either the consent of the owner of the watercourse or the exercise of compulsory powers to create new outfalls or increase the discharge through previously constructed outfalls ended in 1991 with the passing of the Water Industry Act 1991.
- Pre-existing outfalls and discharges constructed or made under the pre-existing legislative regime remain legal.
- As far as bodies such as Internal Drainage Boards are concerned, both the right to discharge and the right of a developer to connect to an existing public sewer under Section 106 of the Water Industry Act are "relevant sewerage provisions" and therefore require consent from the Middle Level Commissioners or Internal Drainage Boards where their systems would be adversely affected, in addition to any consents from the sewerage undertaker.

In addition, any consents issued by either the Commissioners or associated Boards fully consider the implications of the WFD on its watercourses.

MM33 – WB2 Manor Farm Buildings, Warboys

The Planning Inspector's comment is incorrect as it fails to consider the judgement of the Supreme Court in the Commissioners' favour in 2014 (Manchester Ship Canal v United Utilities 2014) which questioned the right of a sewerage undertaker to discharge sewage, both surface water and treated effluent, to a watercourse.

This case established a number of principles and for our purposes established the following:

- The implied right of an undertaker without either the consent of the owner of the watercourse or the exercise of compulsory powers to create new outfalls or increase the discharge through previously constructed outfalls ended in 1991 with the passing of the Water Industry Act 1991.
- Pre-existing outfalls and discharges constructed or made under the pre-existing legislative regime remain legal.
- As far as bodies such as Internal Drainage Boards are concerned, both the right to discharge and the right of a developer to connect to an existing public sewer under Section 106 of the Water Industry Act are "relevant sewerage provisions" and therefore require consent from the Middle Level Commissioners or Internal Drainage Boards where their systems would be adversely affected, in addition to any consents from the sewerage undertaker.

In addition, any consents issued by either the Commissioners or associated Boards fully consider the implications of the WFD on its watercourses.

Regards

Graham Moore  
Planning Engineer

**Middle Level Commissioners**

85 Whittlesey Road, March, Cambs. PE15 0AH

[REDACTED]

[REDACTED]

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Family or Company Name: Endurance Estates and Edmund Thornhill  
Agent: Bidwells (Skinner, Lisa)  
PMM: MM34

## Comment

Agent	Mrs Lisa Skinner (1057031)
Email Address	[REDACTED]
Company / Organisation	Bidwells
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Consultee	Endurance Estates & Edmund Thornhill (1152129)
Company / Organisation	Endurance Estates and Edmund Thornhill
Address	c/o agent * *
Event Name	Proposed Main Modifications 2018
Comment by	Endurance Estates and Edmund Thornhill ( Endurance Estates & Edmund Thornhill - 1152129)
Comment ID	PMM2018:47
Response Date	28/01/19 10:17
Consultation Point	Proposed Main Modification 34 ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.6
Files	<a href="#">Skinner for Endurance Estates_Redacted.pdf</a> <a href="#">Skinner for Endurance Estates - Appendix 1.pdf</a> <a href="#">Skinner for Endurance Estates - Appendix 2.pdf</a>

Please tell us whether you support or object to this proposed main modification. Please note: **Support:** if you select support you will be stating that you think this proposed main modification is both **sound** and **legally compliant** . **Object:** if you select object you will be stating that you think this proposed main modification is either **unsound** and/ or is **not legally compliant** .

Do you  Object

Do you consider this proposed main modification  Not Sound to be sound?



It is important to understand how you think this proposed main modification is not sound. Please refer to the 'Proposed Submission Representations Advice Note' for more information about the options here. Please tick all that apply.

- Do you consider this proposed main modification is not sound because it is not...**
- . Positively prepared
  - . Justified
  - . Effective
  - . Consistent with national policy

Please enter your representation here. You should say why you either support this proposed main modification or why you think it is not sound and/ or not legally compliant.

Please note: There are no limits on the length of representations but please be as concise as possible, including only that which is necessary to explain your representation. You can support your representation with supporting documents if you wish (see below) but please include clear references and reasoning as to why any attachments support your representation.

**Note: Any representations that rely entirely on supporting documents and state 'See attached report' or similar for this question will not be accepted.**

**Please enter your representation here.**

We continue to support the broad strategy for growth that seeks to meet the objectively assessed needs for development through a strategy that aims to balance providing a deliverable, sustainable pattern of future development whilst ensuring choice and diversity in the market. In a rural district, the distribution of growth is critical to achieve a balanced, sustainable pattern of development that allows rural growth that would complement the main strategic sites and key service centres. The local service centre hierarchy included site allocations and with the removal of this category, there are no allocated sites within the wider rural area. We believe the approach within the main modification will restrict the growth and vitality of the rural settlements and adversely impact diversity in the housing supply. It will have a negative impact on the sustainability of rural villages. We therefore believe the fundamental aims of the Council's housing strategy will not be achieved or the requirements to promote sustainable development in rural areas. The following paragraphs of NPPF 2018 are directly relevant: Paragraph 78: "To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby." Paragraph 84 "Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport). The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist." During the Examination in Public, the Council produced up to date evidence of the services and facilities at the Local Service Centres and other key small settlements such as Offord D'Arcy. The Council accepted that within the small settlement category, the level of services and facilities available in the villages varied significantly with the largest supporting a primary school, village shop and public hall etc and the smallest having virtually none at all. The distinction between the local service centre and small settlements was seen as key to delivering development in the rural area, as sites were allocated for housing developments within the local service centre but not the small settlements. The main modifications suggest the deletion of the local service centres but without modifying the approach to development within the small settlements. The suggested approach restricts development to strategic sites and seven key service centres. In a rural area, this strategy fails to identify growth within other settlements and therefore will act as a constraint to development within what is a rural district. This will restrict and not support the approach identified to support a thriving rural economy and the guidance provided within the NPPF. This is particularly relevant in the case of Offord D'Arcy given the range of services and facilities that are already available in the settlement. Our client's site is available to deliver now and there are no constraints to development as identified in the supporting documents that formed part of our previous submission for the Regulation 19

consultation. Whilst we support the broad approach to a settlement hierarchy, we strongly object to the distribution of growth and believe this is contrary to the aim to support a thriving rural economy. The removal of the Local Service Centre Category, without differentiation within the small settlements policy and the fact that no allocations are included within this policy, is considered not to be the most appropriate strategy or is justified against reasonable alternatives. The deletion of allocated sites other than the higher settlement hierarchies will not deliver a balanced approach to housing delivery or meet the aims of the Local Plan. The Plan relies heavily on the larger sites coming forward to deliver housing and this can often be restricted due to the delivery of infrastructure. Smaller site allocations would provide a variety of delivery without such constraints and a broader market offering. We therefore believe this policy should be amended and a tiered approach introduced that accurately reflects the sustainability of each village in respect of services and facilities. In the higher order villages, such as Offord D'Arcy, allocations should be included that would allow some development to come forward other than solely rural exception sites. This would provide certainty and ensure deliverability for the overall housing strategy and support rural communities. Without such allocations, the policy for development in small settlements reverts to a rural housing exceptions policy. As stated in our previous representations, there is a limited housing stock in rural areas and this is acknowledged in the document, Towards a one nation economy, 2015. The Council has also accepted that new dwellings would be required to maintain services due to the decline in household size. This is further expanded upon in the document produced by the County Land & Business Association (CLA), Sustainable Villages - Making Rural Communities Fit for the Future, that is attached as an Appendix 2 to this letter. In summary, the document looks at sustainable villages and making rural communities fit for the future. The Council has stated at paragraph 4.105 that that no allocations were made within small settlements due to the need to travel to access services and facilities elsewhere on a regular basis. However, it was clear at the Examination in Public that the assessments for each village were inaccurate. The latest evidence clearly demonstrates that small settlements such as Offord D'Arcy are sustainable, and they support the day to day needs of their residents, providing key services such as a primary school and also support other villages. In the case of Offord D'Arcy, there is a wide range of community facilities that include a primary school, a public house, village hall, village shop, recreation ground, three churches, children's clothes shop, gift shop, two garages that operate MOT's and services and a nursery school. Paragraph 78 of the NPPF clearly supports development in a village of this nature and acknowledges that in rural areas development in one village may support services in a village nearby. Conclusion The main modifications are therefore considered to be contrary to Government Guidance and would not deliver the housing as required to meet the Council's overall strategy. We believe the amendments requested to the small settlements policy are essential to ensure the Plan meets the four tests: • Positively prepared; • Justified; • Effective; and • Consistent with National Policy Without the amendments requested, the Plan in our view is not sound. The current approach would: • Not support a thriving rural area; • Adversely affect the choice and availability of housing in a rural area; • Restrict development in small settlements that are clearly sustainable and already support other villages within the community that offer practically no services or facilities. The amendments requested would lead to a positive approach being taken to deliver sustainable development in the in the rural area. It would avoid uncertainty and create equal opportunities.

Please tell us whether changes can be made to address the issue(s) you have identified.

**Can the issue(s) you have identified be addressed by making changes to the proposed main modification?** Yes

Please tell us what changes would address the issue(s) that you have identified.

You should say why these changes will make this proposed main modification sound and/ or legally compliant.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it ( **U** ) and identifying any text to be deleted by striking it through ( **ABC** ).

**What changes would address the issue(s) that you have identified?**

We therefore believe this policy should be amended and a tiered approach introduced that accurately reflects the sustainability of each village in respect of services and facilities. In the higher order villages, such as Offord D'Arcy, allocations should be included that would allow some development to come forward other than solely rural exception sites. This would provide certainty and ensure deliverability

for the overall housing strategy and support rural communities. Without such allocations, the policy for development in small settlements reverts to a rural housing exceptions policy.

## Summary

The main modifications are contrary to Government Guidance (NPPF 78 and 84) and would not deliver the housing to meet the Council's overall strategy. As stated in our previous representations, there is a limited housing stock in rural areas and this is acknowledged in the document, Towards a one nation economy, 2015. The following amendments to the small settlements policy are essential to ensure the Plan meets the four tests of soundness. • Identify growth within other settlements. • Introduce a tiered approach that accurately reflects the sustainability of each village in respect of services and facilities. Higher order villages should then include allocations. • Offord D'Arcy has a range of services and facilities. Land off Graveley Road, Offord D'Arcy should be included as an allocation is available to deliver now and there are no constraints to development as identified in the supporting documents that formed part of our previous submission for the Regulation 19 consultation. Without the amendments requested, the Plan in our view is not sound. The current approach would: • Not support a thriving rural area; • Adversely affect the choice and availability of housing in a rural area; • Restrict development in small settlements that are clearly sustainable and already support other villages within the community that offer practically no services or facilities.

Family or Company Name: Godfrey, Jane  
Agent: PlanSurv Ltd (Hendry, Michael)  
PMM: MM34

## Comment

Agent	Mr Michael Hendry (772729)
Email Address	[REDACTED]
Company / Organisation	PlanSurv Ltd
Address	[REDACTED] [REDACTED] [REDACTED]
Consultee	Ms Jane Godfrey (1196923)
Address	[REDACTED] [REDACTED] [REDACTED]
Event Name	Proposed Main Modifications 2018
Comment by	Ms Jane Godfrey (1196923)
Comment ID	PMM2018:19
Response Date	22/01/19 15:44
Consultation Point	Proposed Main Modification 34 ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.3
Files	<a href="#">Sketch Layout</a>

Please tell us whether you support or object to this proposed main modification. Please note: **Support:** if you select support you will be stating that you think this proposed main modification is both **sound** and **legally compliant** . **Object:** if you select object you will be stating that you think this proposed main modification is either **unsound** and/ or is **not legally compliant** .

Do you  Object

Do you consider this proposed main modification  Not Sound to be sound?

It is important to understand how you think this proposed main modification is not sound. Please refer to the 'Proposed Submission Representations Advice Note' for more information about the options here. Please tick all that apply.

**Do you consider this proposed main modification is not sound because it is not...** . Justified  
Effective

Please enter your representation here. You should say why you either support this proposed main modification or why you think it is not sound and/ or not legally compliant.

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**Note: Any representations that rely entirely on supporting documents and state 'See attached report' or similar for this question will not be accepted.**

**Please enter your representation here.**

The proposed removal of the Local Service Centre chapter fails to recognise the level of existing services contained in Alconbury, Bluntisham and Great Staughton and the contribution that the proposed allocation in these settlements will make to the vitality of the community and the settlement's ability to retain and attract further services. Main Modification 34 should not therefore be made.

### **Supporting documents**

If you would like you can support your representation with supporting documents. Please provide a description for any documents you upload and clearly reference them in your representation.

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### Sketch Layout

Please tell us whether changes can be made to address the issue(s) you have identified.

**Can the issue(s) you have identified be addressed by making changes to the proposed main modification?** Yes

Please tell us what changes would address the issue(s) that you have identified.

You should say why these changes will make this proposed main modification sound and/ or legally compliant.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it ( **U** ) and identifying any text to be deleted by striking it through ( **ABC** ).

**What changes would address the issue(s) that you have identified?**

Main Modification 34 should not be made

### **Summary**

Objects to Main Modification 34. The removal of the Local Service Centre chapter fails to recognise the level of existing services and the contribution that the proposed allocation in these settlements will make to the vitality of the community and the settlement's ability to retain and attract further services.

Family or Company Name: Childerley  
Agent: Barford & Co. (Tindle, Simon)  
PMM: MM38

## Comment

Agent	Mr Simon Tindle (1032436)
Email Address	[REDACTED]
Company / Organisation	Brown&Co Barfords
Address	[REDACTED] [REDACTED] [REDACTED]
Consultee	Mrs S Childerley (1117058)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED]
Event Name	Proposed Main Modifications 2018
Comment by	Mrs S Childerley (1117058)
Comment ID	PMM2018:65
Response Date	29/01/19 16:36
Consultation Point	Proposed Main Modification 38 ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.6
Files	<a href="#">Childerley Statement 28.01.19.pdf</a>

Please tell us whether you support or object to this proposed main modification. Please note: **Support:** if you select support you will be stating that you think this proposed main modification is both **sound** and **legally compliant** . **Object:** if you select object you will be stating that you think this proposed main modification is either **unsound** and/ or is **not legally compliant** .

Do you  Object

Do you consider this proposed main modification  Not Sound  
to be sound?

It is important to understand how you think this proposed main modification is not sound. Please refer to the 'Proposed Submission Representations Advice Note' for more information about the options here. Please tick all that apply.

**Do you consider this proposed main modification is not sound because it is not...**

- . Positively prepared
- . Justified
- . Effective
- . Consistent with national policy

Please say whether you think this proposed main modification is legally compliant. Please refer to the 'Proposed Submission Representations Advice Note' for more information about the issues covered by legal compliance.

**Do you consider this proposed main modification to be legally compliant?** Not legally compliant

Please enter your representation here. You should say why you either support this proposed main modification or why you think it is not sound and/ or not legally compliant.

Please note: There are no limits on the length of representations but please be as concise as possible, including only that which is necessary to explain your representation. You can support your representation with supporting documents if you wish (see below) but please include clear references and reasoning as to why any attachments support your representation.

**Note: Any representations that rely entirely on supporting documents and state 'See attached report' or similar for this question will not be accepted.**

**Please enter your representation here.**

We highlight previously raised concerns regarding the expected housing delivery trajectory and the reliance upon the unreasonable high rate of delivery at the Strategic Expansion Locations. We note that the Loves Farm Site, which is expected to deliver dwellings in 2019-20, is still awaiting planning permission and the Wintringham Park Reserved matters, also aiming to commence delivery of housing in 2019-20, is also awaiting reserved matters approval for the housing element. It is apparent that the Inspector has now recommended the capping of delivery rates at the SELs and included an allowance for windfall development. It is further observed that an allowance of 35 rural exception dwellings has been included as a makeweight, despite any compelling evidence of past delivery. This inclusion is more than optimistic and therefore unjustified. The NPPF highlights the importance of a variety of land coming forward where needed. It also places emphasis on the important contribution that can be made by small and medium sites to the housing requirement of the area, which can be built out quickly. This adds to the flexibility of the plan and allows growth and vitality in rural areas. Notwithstanding the above, should the settlement tier of Local Service Centers be removed from the settlement hierarchy as proposed by the modifications, it does not necessarily follow that all site allocations therein must also be expunged. Modified Policy LP2 makes provision for a quarter of the OAN to be accommodated in Key Service Centres together with Small Settlements to support the vitality of those communities and proportionate allocations at the larger of those small settlements will accord with these aims. We object to the proposed modifications as they are unjustified and will impact upon the effectiveness of the plan. We further question the consistency with national policy.

### **Supporting documents**

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To upload more than one document first select your first document and upload it, then save your comment using the button at the bottom of the page. You can then select another document to upload.

Please tell us whether changes can be made to address the issue(s) you have identified.

**Can the issue(s) you have identified be addressed by making changes to the proposed main modification?** Yes

Please tell us what changes would address the issue(s) that you have identified.

You should say why these changes will make this proposed main modification sound and/ or legally compliant.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it ( **U** ) and identifying any text to be deleted by striking it through ( **ABC** ).

**What changes would address the issue(s) that you have identified?**

Reiterates concerns over reliance on high delivery rates at SELs. Contends the NPPF places emphasis on the important contribution that can be made by small and medium sites to the housing requirement of the area, which can be built out quickly. Suggests that even if the Local Service Centres category is removed the allocations should be retained.

**Summary**

Reiterates concerns over reliance on high delivery rates at SELs. Contends the NPPF places emphasis on the important contribution that can be made by small and medium sites to the housing requirement of the area, which can be built out quickly. Suggests that even if the Local Service Centres category is removed the allocations should be retained.



**Objection representation in regard to proposed Main Modifications  
1 and 38 to the Huntingdonshire Local Plan to 2036 and  
associated Main Modifications Sustainability Appraisal in respect  
of the intended deletion of site GS1 for residential development of  
approximately 20 homes on land at The Green Great Staughton**

**on behalf of Mrs S Childerley**

---

Prepared by: Simon Tindle, Divisional Partner

For and on behalf of Brown & Co.

Brown & Co is a leading provider of agency, professional and consultancy services across the whole range of rural, commercial, residential, and agricultural markets.

Date: January 2019.

Reference: 017234.

## **1.0 Introduction**

- 1.1** Brown & Co Barfords have been instructed to submit the following Objection on behalf of Mrs S Childerley the owner of land at The Green, Great Staughton which is currently allocated for residential development of approximately 20 homes (Site GS1) in the Submission Local Plan and is proposed to be deleted as a result of Modifications 1 and 38.

## **2.0 Background**

- 2.1** The Council's Housing & Economic Land Availability Assessment (HELAA) December 2017 appraisal of the site indicated that the site is considered suitable for low density residential development, with few identified constraints.
- 2.2** The site was subsequently allocated in the proposed submission version of Huntingdonshire's Local Plan to 2036, attracting 2No. technical objections from Historic England and the Environment Agency respectively. It is considered that both objections could be suitably addressed at planning application stage with neither objecting to the principle of development.
- 2.3** At the Examination in Public the Council indicated that residential development of the site would bring important economic, social and environmental benefits along with contributing to the Council's housing land supply, whilst identifying no major adverse impacts.
- 2.4** The allocation of the site has subsequently been recommended for deletion from the Local Plan as a result of modifications 1 and 38.

## **3.0 Objection to Modification 1 and 38**

- 3.1** We highlight previously raised concerns regarding the expected housing delivery trajectory and the reliance upon the unreasonable high rate of delivery at the Strategic Expansion Locations. We note that the Loves Farm Site, which is expected to deliver dwellings in 2019-20, is still awaiting planning permission and the Wintringham Park Reserved matters, also aiming to commence delivery of housing in 2019-20, is also awaiting reserved matters approval for the housing element.
- 3.2** It is apparent that the Inspector has now recommended the capping of delivery rates at the SEL's and included an allowance for windfall development. It is further observed that an allowance of 35 rural exception dwellings has been included as a makeweight, despite any compelling evidence of past delivery. This inclusion is more than optimistic and therefore unjustified.
- 3.3** The NPPF highlights the importance of a variety of land coming forward where needed. It also places emphasis on the important contribution that can be made by small and medium sites to the housing requirement of the area, which can be built out quickly. This adds to the flexibility of the plan and allows growth and vitality in rural areas.

3.4 Notwithstanding the above, should the settlement tier of Local Service Centers be removed from the settlement hierarchy as proposed by the modifications, it does not necessarily follow that all site allocations therein must also be expunged. Modified Policy LP2 makes provision for a quarter of the OAN to be accommodated in Key Service Centres together with Small Settlements to support the vitality of those communities and proportionate allocations at the larger of those small settlements will accord with these aims.

3.5 We object to the proposed modifications as they are unjustified and will impact upon the effectiveness of the plan. We further question the consistency with national policy.

#### **4.0 Objection to Sustainability Appraisal in relation Proposed Main Modification 38**

4.1 The appraisal of the proposed main modification indicates the impacts of removal of the allocation to be neutral, as “not allocating this site may result in alternative development”. We object to this appraisal as non allocation this site will result in alternative development if the Council are to meet their OAN.

4.2 Specifically, the OAN needs to consider the impact of alternative development against that of the original proposed allocation. Such alternatives are indicated in the housing trajectory as increases in numbers at some allocated sites, windfall sites including prior approvals/ rural exception sites. The impacts of alternative development can therefore be quantified where an increase in housing numbers is proposed on other allocated sites e.g. HU6, SN1. Furthermore, by their very nature, prior approvals/ rural exceptions sites are located in less sustainable locations and must be considered as such. Impacts of modifications cannot simply be ignored or ‘written off’ as unknown or uncertain.

4.3 The current approach simply serves to highlight the uncertainty of delivery and that the modified approach will provide for the most sustainable opportunities.



Family or Company Name: Godfrey, Jane  
Agent: PlanSurv Ltd (Hendry, Michael)  
PMM: MM39

## Comment

**Agent** Mr Michael Hendry (772729)  
**Email Address** [REDACTED]  
**Company / Organisation** PlanSurv Ltd  
**Address** [REDACTED]  
**Consultee** Ms Jane Godfrey (1196923)  
**Address** [REDACTED]  
**Event Name** Proposed Main Modifications 2018  
**Comment by** Ms Jane Godfrey (1196923)  
**Comment ID** PMM2018:20  
**Response Date** 22/01/19 15:45  
**Consultation Point** Proposed Main Modification 39 ([View](#))  
**Status** Processed  
**Submission Type** Web  
**Version** 0.9  
**Files** [Final Transport Statement for Cage Lane.pdf](#)  
[Sketch Layout \(1\)](#)  
[Cage Lane FRA and Drainage Strategy For Submission.pdf](#)

Please tell us whether you support or object to this proposed main modification. Please note: **Support:** if you select support you will be stating that you think this proposed main modification is both **sound** and **legally compliant** . **Object:** if you select object you will be stating that you think this proposed main modification is either **unsound** and/ or is **not legally compliant** .

**Do you** Object

**Do you consider this proposed main modification to be sound?** Not Sound

It is important to understand how you think this proposed main modification is not sound. Please refer to the 'Proposed Submission Representations Advice Note' for more information about the options here. Please tick all that apply.

**Do you consider this proposed main modification is not sound because it is not...**

- Positively prepared
- Justified
- Effective

Please enter your representation here. You should say why you either support this proposed main modification or why you think it is not sound and/ or not legally compliant.

Please note: There are no limits on the length of representations but please be as concise as possible, including only that which is necessary to explain your representation. You can support your representation with supporting documents if you wish (see below) but please include clear references and reasoning as to why any attachments support your representation.

**Note: Any representations that rely entirely on supporting documents and state 'See attached report' or similar for this question will not be accepted.**

**Please enter your representation here.**

The removal of the allocation GS2 as part of the proposed Main Modification 39 (MM39) risks the sustainability and currently available services of the existing settlement of Great Staughton. The greater distribution of new dwellings across a wider number of settlements, proportionate to their size, helps to ensure the effectiveness and deliverability of the Plan and the housing growth contained therein. The removal of Policy LP9 makes the Local Plan more vulnerable to economic change and the deliver rates of fewer larger sites, where delays can often be significant. The deletion of allocation GS2 therefore negatively impacts the promotion of growth in sustainable locations and retaining the quiet rural character of the area (SA objective 8 and 10) by relying of larger allocations rather than a more disbursed approach. In addition the removal of the allocation fails to match population and employment growth (SA objective 18) and therefore encourages commuting and prevents a critical mass of population in these settlement that might ultimately help to sustain existing services and attract new services to Great Staughton thereby improving the overall sustainability. Main Modification 39 should be removed and allocation GS2 should be reinstated in order to deliver proportionate growth to the Great Staughton to ensure it remains vibrant and sustainable community regardless of whether the Local Service Centre tier of the hierarchy is retained. An indicative layout plan, Transport Statement and Flood Risk Assessment accompany the representation to demonstrate the deliverability and sustainability of the Land Between 20 Cage Lane and Averyhill, Great Staughton (Emerging Allocation GS 2) and the contribution it could make to housing in the early years of the Plan.

### **Supporting documents**

If you would like you can support your representation with supporting documents. Please provide a description for any documents you upload and clearly reference them in your representation.

If you want to refer to a publication that is available elsewhere or that is subject to copyright that you do not control please provide a link to a website where it is available or give a full reference (including author(s), full title and date of publication) in your comment.

By submitting a supporting document you give permission for the council to use it for the purposes of drawing up planning policy for Huntingdonshire and to reproduce the document for such purposes.

Please note: There is no limit to the size of documents that can be uploaded but please only upload relevant documents and consider the use of extracts for long documents.

To upload more than one document first select your first document and upload it, then save your comment using the button at the bottom of the page. You can then select another document to upload.

### Sketch Layout (1)

Please tell us whether changes can be made to address the issue(s) you have identified.

**Can the issue(s) you have identified be addressed Yes  
by making changes to the proposed main  
modification?**

Please tell us what changes would address the issue(s) that you have identified.

You should say why these changes will make this proposed main modification sound and/ or legally compliant.

It would be helpful if you could include revised wording of any policy or text. Please identify additional text by underlining it ( **U** ) and identifying any text to be deleted by striking it through ( **ABC** ).

**What changes would address the issue(s) that you have identified?**

Main Modification 39 should not be made regardless of whether Great Staughton is in the Local Service Centre or Small Settlement tier of the hierarchy as its delivery will help ensure the vitality of the village both in terms of the demographic and its ability to maintain and attract services.

**Summary**

Object to Main Modification 39. Removal of Policy LP 9 is contrary to Sustainability objectives 8,10 and 18. It impacts upon the promotion of growth in sustainable locations, forces the Plan to rely on the delivery of large allocations making it more vulnerable to economic change, encourages commuting and reduces ability to retain existing services and attract new ones to the area. Allocations in the Local Service Centre Category should be retained. Allocation GS 2 is deliverable and sustainable; supporting documents are attached.