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Environment Agency

Aaron Sands
Huntingdonshire District Council
Pathfinder House St. Marys Street
Huntingdon
Cambridgeshire
PE29 3TN

Our ref: AC/2024/132456/04-L01
Your ref: 24/01827/HDC

Date: 03 November 2025

Dear Aaron,

(I) INTERNAL AND EXTERNAL ALTERATIONS AND CHANGE OF USE OF HOTEL (CLASS C2) TO 2NO. COMMERCIAL UNITS (CLASS E) AND 5NO. RESIDENTIAL UNITS (CLASS C3); (II) INTERNAL AND EXTERNAL ALTERATIONS AND CHANGE OF USE OF BOATHOUSE (CLASS C2) TO 2NO. RESIDENTIAL UNITS (CLASS C3); (III) PARTIAL DEMOLITION OF NORTHWEST AND SOUTHWEST WINGS AND ASSOCIATED WORKS; (IV) ERECTION OF NEW WINGS COMPRISING 7NO. RESIDENTIAL UNITS (CLASS C3); (V) ASSOCIATED LANDSCAPING, ANCILLARY AND ENGINEERING WORKS AND INTERNAL AND EXTERNAL ALTERATIONS

HOTEL 10 - 14 MARKET SQUARE, ST NEOTS

Thank you for your consultation dated 17 October 2025. We have reviewed the documents as submitted and are objecting in principle to this proposal. The proposed development falls into a flood risk vulnerability category that is inappropriate to the flood zone in which the site is located, therefore this is an objection in principle.

If you are minded to approve the application contrary to this advice, we request that you contact us to allow further discussion and/or representations from us in line with the Town and Country Planning (Consultation) (England) Direction 2009.

Flood Risk

Our previous objections from our letter referenced AC/2024/132456/03-L01, dated 21 March 2025 remain relevant. I have attached a copy of the previous response to the end of this letter.

Building in Flood Zone 3b

We maintain our objection until the proposed development is revised so that there is no development other than 'water compatible' development within Flood Zone 3b. In addition, we would like to reiterate that the proposals include more vulnerable development within flood zone 3b. To overcome our objection, the site would require a sequential approach to guide development to the lowest flood risk areas and outside of the flood zone 3b extent.

Please note that the proposed development includes ground floor sleeping accommodation and single storey residential development in flood zone 3b. The FRA states that the finished floor levels cannot be raised to the appropriate level.

The Cambridgeshire SPD states the following:

> "5.1.28 Single storey residential development and ground floor flats are generally more vulnerable to flood damage as occupants do not have the opportunity to retreat to higher floor levels and salvage belongings to higher ground. For this reason single storey housing and ground floor flats in flood risk areas should not be allowed unless finished floor levels are set above the appropriate flood level for the lifetime of the property (taking into account the appropriate climate change allowance), and there is safe access and escape.
> 5.1.29 Sleeping accommodation on the ground floor that relies on flood warnings and the implementation of flood proofing measures is hazardous. Change of use from commercial to residential that results in proposed ground floor flats in Flood Zone 3 is unlikely to be acceptable (even with the use of flood proofing measures to mitigate the flood risk) unless finished floor levels are or can be raised above the predicted flood level (with an appropriate allowance for climate change), and there is safe access to and escape from higher storeys of the building
> 5.2.7 The effectiveness of flood resistance measures depends upon the occupier understanding the features, utilising them correctly when required and carrying out any needed maintenance"

The committee report (section 7.62) has suggested that reliance on demountable defences is appropriate for this development. This is in contradiction with the Cambridgeshire SPD which clearly states that reliance on flood resistance measures are hazardous.

Flood Plain Compensation

We have reviewed the Flood Plain Compensation proposals which form part of the proposals to redevelop 10-14 Market Square St Neots.

We have assessed the information submitted and would not consider the proposed floodplain compensation to be appropriate. The proposals include voids or breaks in the river wall to provide hydraulic connectivity as well as voided or honeycomb brickwork to allow for the passage of flood water into voids below the proposed buildings.

Voids (both in the brickwork on the river wall and beneath the buildings) are not an appropriate means of floodplain compensation as these are likely to become blocked by debris which reduces the storage and flow capacity. If the voids become blocked floodwater will be displaced and will increase flood risk to the surrounding area. To avoid this, floodplain compensation must be provided on a level for level, volume for volume Please refer to Paragraph: 049 Reference ID: 7-049-20220825 https://www.gov.uk/guidance/flood-risk-and-coastal-change.

Flood Defenses

The Environment Agency uses permissive powers to carry out annual visual asset inspections along this section of the River Great Ouse, therefore access to carry out the visual asset inspections should remain.

It is unclear whether there are any material changes to drainage into the River Great Ouse which could increase flood risk i.e. are there any intentions to install any new outfalls/flapped valves?

We will require records of any engineering inspections which assess the condition of the dam boards (typically annual visual asset inspections and more detailed engineering inspections 6 yearly). We will also require operational details for the dam boards.

Without this information, it is unlikely that we would grant a flood risk activity permit (FRAP) for this application. The applicant should be reminded that it is their responsibility to check the requirements for any FRAP.

Previous Response

We have attached an appendix which contains our previous letter response. This details our objection in principle and highlights the flood risk of the site.

We trust that this advice is useful.

Yours sincerely,

[redacted]

Sustainable Places - Planning Advisor

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Appendix- Previous Response

Aaron Sands
Huntingdonshire District Council
Pathfinder House St. Marys Street
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PE29 3TN

Our ref: AC/2024/132456/03-L01
Your ref: 24/01827/HDC

Date: 21 March 2025

Dear Aaron,

(I) INTERNAL AND EXTERNAL ALTERATIONS AND CHANGE OF USE OF HOTEL (CLASS C2) TO 2NO. COMMERCIAL UNITS (CLASS E) AND 5NO. RESIDENTIAL UNITS (CLASS C3); (II) INTERNAL AND EXTERNAL ALTERATIONS AND CHANGE OF USE OF BOATHOUSE (CLASS C2) TO 2NO. RESIDENTIAL UNITS (CLASS C3); (III) PARTIAL DEMOLITION OF NORTHWEST AND SOUTHWEST WINGS AND ASSOCIATED WORKS; (IV) ERECTION OF NEW WINGS COMPRISING 7NO. RESIDENTIAL UNITS (CLASS C3); (V) ASSOCIATED LANDSCAPING, ANCILLARY AND ENGINEERING WORKS AND INTERNAL AND EXTERNAL ALTERATIONS

HOTEL 10 - 14 MARKET SQUARE, ST NEOTS

Thank you for your consultation regarding this application. We are objecting in principle to this proposal and feel it is appropriate to clarify our position regarding the redevelopment of this site.

The application site partially lies within the fluvial Flood Zone 3b (functional floodplain). The Flood Risk Assessment needs to comply with paragraph 170 of the NPPF and Table 2 of the Flood risk PPG, which states that any development considered 'more vulnerable' in Annex 3: Flood Vulnerability classification of the PPG is incompatible within Flood Zone 3b.

As the proposal is made up of multiple aspects and types of application, we have summarised our position on each aspect:

i. **Internal and External alterations and Change of Use of Hotel (Class C2) to 2no. Commercial Units (Class E) and 5no. Residential units (Class C3);**

   The proposed internal and external alterations, along with the change of use of the hotel, are located outside the extent of flood zone 2 and 3. We have no objections regarding this aspect of the application.

ii. **Internal and External Alterations and Change of Use of Boathouse (Class C2) to 2no. Residential Units (Class C3);**

Applications for certain changes of use, including the proposal to change the boat house to residential units, are not subject to the sequential test, nor the exception test. Such proposals still require a site-specific flood risk assessment. The development should be made safe for its lifetime without increasing flood risk elsewhere (Paragraph 170 of the NPPF).

iii. **Partial demolition of Northwest and Southwest Wings and associated works;**

The proposed partial demolition of the Northwest and Southwest Wings and associated works will not have any negative impact on flood risk. We have no objections to this aspect of the development.

iv. **Erection of new wings comprising 7no. residential units (Class C3);**

The proposal to erect 7 new dwellings will need to demonstrate that no incompatible development will occur within flood zone 3b (the functional floodplain) and that any dwelling located within flood zone 3a has passed the sequential test and both parts of the exception test. This aspect of the development is different from parts i) and ii) as it is not a change of use application.

Annex 3 of the NPPF states that the flood risk vulnerability of dwelling houses is 'More vulnerable'. Table 2 of the Flood Risk and Coastal Change PPG clearly shows that 'More vulnerable' development should not be permitted within flood zone 3b. To address our objection, all proposed new dwellings need to be removed from flood zone 3b, and evidence be provided to Huntingdonshire District Council to demonstrate a sequential approach has been applied to guide development towards the areas of lowest flood risk. If the new dwellings are deemed to have passed the sequential test, then the exception tests will need to be applied and passed, including, but not limited to, the provision of floodplain compensation for the loss of floodplain storage. The exception test is not a tool to justify inappropriate development or development proposals that have failed the sequential test.

v. **Associated landscaping, ancillary and engineering works and internal and external alterations;**

Any ground raising proposed as part of these works within Flood Zone 3 will require floodplain compensation to ensure the development doesn't increase flood risk off site.

Retaining Wall

In addition, the proposed ground floor drawing refers to a 'new retaining wall along existing brick boundary wall; (ground levels will need to be raised by approx. 950mm in the area of the terrace/patio for unit 3)'. This will also result in a loss of floodplain capacity and consequently have offsite impacts.

As with any works within 8m of the top of the bank of the main river, the construction of a new retaining wall would require a Flood Risk Activity Permit from the Environment Agency. As part of the permit process, it must be demonstrated that the

structure will not increase flood risk to third parties. This is likely to necessitate flood modelling and must account for the additional ground raising, the risks of which are highlighted below. Furthermore, any future owners of the retaining wall would be responsible for its ongoing maintenance.

Flood Zone Compatibility

The first aspect of the sequential approach to developing within areas of flood risk is determining whether a proposed development use is compatible with the flood zone that it sits within. The NPPF is very clear that inappropriate development, including housing within the functional floodplain, should not be permitted.

The NPPF specifies a specific order for flood risk mitigation, and even if an application can demonstrate that it could pass the exception test, developments that are incompatible or have failed the sequential test, should still be refused.

It is for this reason that we maintain our objection in principle.

If it can be demonstrated that all new dwellings are located outside of the functional floodplain, the applicant would still have to demonstrate for all new houses within flood zone 3a that the exception test can be passed.

Exception Test

It should be demonstrated that:

- development that has to be in a flood risk area will provide wider sustainability benefits to the community that outweigh flood risk; and
- 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.

We do not provide direct comments on the first part of the exception test, but the PPG does include guidance on how to apply it.

The second part of the exception test includes the requirement for the applicant to demonstrate that the proposal will not increase flood risk elsewhere. Where development is proposed within the fluvial floodplain, floodplain compensation is usually required to help achieve this. The new dwellings under part ‘iv’ of the proposals result in a loss of floodplain storage as the development encroaches further into the floodplain than the existing buildings and involves ground raising. This will displace water that would otherwise naturally flow or be stored there. The preferred option would be to change the layout to avoid the areas at risk of flooding altogether. If this is not feasible then floodplain compensation will be required to safely accommodate the displaced flood waters. Compensation is only required for any ground raising and any new encroachment into flood zone 3 (Activity iv & v). To properly assess the need for and effectiveness of floodplain compensation, further modelling and detailed calculations may be required.

Flood Risk Assessment (FRA)

We hope this helps explain the complexities of this proposal in terms of flood risk. Due to these complexities, we feel that the FRA will need to be improved to resolve all the issues we have raised, including the issue of flood zone compatibility. It remains the applicant's responsibility to thoroughly assess the flood risk implications of the proposed development within their FRA. The uncertainties surrounding the potential impacts underscore the FRA's inadequacy in effectively assessing the development's effect on flood zone 3, and significantly the impacts on the functional floodplain.

This lack of comprehensive assessment forms the basis of our previous objections. As a result, we cannot confirm that the site will be safe over its lifetime, nor can we verify that the development will not increase flood risk elsewhere.

Summary

Part (iv) of the proposal is contrary to both the NPPF and PPG.

Additionally, the information submitted to date is not sufficient to demonstrate that the development will not put the future users of the development at risk of flooding or increase the risk of others.

To progress we would recommend the following:

- All new dwellings are located outside of the functional floodplain (FZ3b)
- All new dwellings within flood zones 3a or 2 are sequentially tested to determine whether there are reasonably available alternative sites at lower flood risk that can provide the housing.
- Where the sequential test has been passed, all new Dwellings within flood zone 3a are subjected to the exception test.
    - Where flood storage is to be lost as a result of development, on-site level-for-level compensatory storage (which accounts for the predicted impacts of climate change over the lifetime of the development) is provided. Where it is not possible to provide compensatory storage on site, it may be acceptable to provide it off-site if it is hydraulically and hydrologically linked. This will need to be included in the FRA.
- The FRA is updated to demonstrate that, as a minimum part 2 of the exception test for the entire site has been passed, including that any new retaining wall, dwelling or ground raising has been appropriately mitigated for through floodplain compensation and that there are no impacts to any third parties.

We would be happy to support the Local Planning Authority in assessing any future Flood Risk Assessments and amended proposals for this site.

We trust that this advice is useful.

Yours sincerely,



Ms Megan Turnpenney
Sustainable Places - Planning Advisor

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