Broughton
Parish Council

20 November 2024

Huntingdon District Council
Pathfinder House
St Mary's Street
Huntingdon
PE29 3TN

Subject: Local Plan Consultation Response: CfS 47, Hungary Hall, West of A141, Wyton on the Hill

Dear Sirs

Executive Summary

Broughton Parish Council has considered the proposed development on the Hungary Hall site which lies to the west of the A141. This is a large-scale development, proposed by the promoter at around 5,000 homes and assessed by Huntingdonshire District Council at 4,061.

In this document we set out issues relevant to the Land Area Assessment of this site and comment on the Site Appraisal ratings made for the site as well as the Further Issues and Options 2024 with respect to Tackling Flooding and Water.

The site differs from the other Wyton on the Hill proposed sites in that it is separated from Wyton by the A141. Instead, this site extends to the north and west, encroaching on Broughton at its furthest extent.

Our assessment is that development on this site would be harmful in a number of respects, including: flood risk, environment, loss of valuable agricultural land, traffic and damage to Broughton's Conservation Area.

Our recommendation is that this site be withdrawn from consideration.

This letter includes:

1. Introduction - a brief description of Broughton
2. Comments on the site and associated constraints
3. Comments on the proposed development and associated impacts
4. Comments on the Site Appraisal
5. Our conclusions and recommendations

Appendix: Broughton Village – Conservation Notes

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Introduction

Broughton is a small village just over 1km west of the A141 and around 2km south-west of Warboys. The village dates back to Anglo-Saxon times and much of the village is within a Conservation Area. The Conservation area includes 27 listed buildings protected for their special architectural and/or historic interest. The proposed development site is entirely within the Conservation Area.

Broughton is situated in a landscape of much environmental significance, with the surrounding countryside providing valuable habitats for wildlife. The village is surrounded by farmland and meadows. When not in flood, the Bury Brook adds to the village's charm and plays an important role in supporting biodiversity in the area including hedgerows and grasslands rich in wildlife. The appendix at the end of this document provides further details of the history and significance of the village.

Properties and roads – particularly Causeway Road - in Broughton have a history of flooding from the Bury Brook and surface runoff. This is a continuing problem, which will be exacerbated by climate change and development. The Environment Agency and Cambridge County Council, as Lead Local Flood Authority, have supported Broughton's Flood Action Group since the latest severe flooding in December 2020.

The village is served by three minor roads, two of which connect to the A141. The roads meet at a T-junction in the centre of the village which has restricted visibility. The roads carry both vehicular and pedestrian traffic since much of the village is without pavements. The roads are narrow and subject to rat-run traffic.

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The Site

Greenfield Development

The proposed site is a greenfield site comprising mostly grade 2 agricultural land. This is irreplaceable and its value from an environmental and food security point of view should not be ignored. Its loss would be contrary to NPPF Section 15 Conserving and enhancing the natural environment, 180(b) and to DEFRA environmental policies relating to Environmental Land Management, encouraging farmers through schemes such as Countryside Stewardship and Sustainable Farming Incentive to increase the amounts of hedgerows, trees and biodiversity on their land.

The Land Availability Assessment considers this site suitable for greenfield development as it is not grade 1.

Grade 2 land is still characterised as 'best and most versatile agricultural land' in the National Planning Policy Framework (NPPF), designated as very good quality. The NPPF is clear that lower quality land should be developed in preference.

Grade 2 land throughout East Anglia is the bread basket of the UK and is ideal for growing cereals such as milling wheat for processing into flour, oats, oil-seed rape and beans, all for human consumption, and the consistent loss of such land compromises UK food security by increasing the reliance on imported cereals, where also there is a risk those countries' standards of production, traceability and use of toxic chemicals do not align with those of the UK. Imported food has many more food miles than UK grown food.

Development should be prioritised for brownfield sites first, and then lower quality land in preference to Grade 2.

Containing Development

The Land Area Assessment proposes 115.01ha for development (30%) in the southern part of the site, with the balance being for open spaces, sports, biodiversity, planting and drainage.

The site has no natural boundaries within it to restrict development. It is likely, therefore, that development in future years will expand from the 30% to subsume the planned "green areas".

There is also a risk that developers will seek to make use of the northern part of the site, adjacent to Broughton, to benefit from a rural / village setting for higher-valued properties. This will blur the boundaries between the new developments and the historic village, ultimately leading to Broughton being subsumed as a suburb within the larger conurbation.

Services

The A141 separates this development from Wyton airfield and so the site would not readily benefit from the facilities provided, or to be provided, on the other development sites there.

The facilities available in Broughton: a church, pub and village hall meet the needs of the village community but are inadequate for the scale of the Hungary Hall development.

Environment

Broughton is surrounded by farmland. It has 2 County Wildlife sites within the village and a further site, managed by a local farmer, nearby.

The rural surroundings contribute to the extensive heritage assets of the village, as noted in the Land Area Assessment. The Huntingdonshire District Council's Character Assessment of the Conservation Area identifies *a number of key elements which combine to give the village its sense of place* including:

- *The existence of long ranging vistas out of the Conservation Area into the surrounding countryside, and*
- *The presence of long-established hedges, earth banks and landscaped boundaries*

From light pollution maps (e.g., CPRE's Light Pollution Dark Skies map) Broughton can be seen to have relatively dark skies. Light pollution from Warboys and Wyton is visible on the horizon from Broughton, but with no streetlighting, the sky overhead is relatively dark.

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The Proposed Development and its Impacts

Flooding

Introduction

Properties and roads in Broughton have a history of flooding which is currently underestimated by the available hazard mapping, and which will increase with climate change.

The Environment Agency and Cambridge County Council as Lead Local Flood Authority have supported Broughton Flood Action Group[1] since the flooding in December 2020[2] because they recognise the scale of the current risk and the difficulties of managing future risk. Therefore, any increased pressure on the rapidly responding Bury Brook catchment will exacerbate the impacts of climate and further increase flooding in Broughton. This includes the substantial proposed developments at Hungary Hall Farm (CfS 47), Lodge Farm (CfS 256) and Sapley Park Garden Village (CfS 197), which lie immediately upstream of Broughton in the Bury Brook catchment. The urbanisation of any one or more of these currently greenfield areas will concentrate runoff into the river which, due to the shallow gradient, drains slowly and via pumps to Europe's largest pump station at St Germans (Kings Lynn).

Causeway Road in Broughton already floods regularly to depths that leave cars stranded and, with high velocities, pose a risk to life. See the following selection of photos from past flood events. Cambridge County Council have recently installed a flood gauge on the footbridge adjacent to Causeway Road as this is one of the first sites in the village to flood.

The proposed Hungary Hall development, upstream of Broughton, as well as major developments at Lodge Farm (CfS 256) and Sapley Park Garden Village (CfS 197) would significantly increase the existing risk and directly oppose the Risk Management Authorities' ongoing attempts to reduce flood risk in the village, as well as downstream in Wistow and Ramsey. To provide a joined-up response with regards flood risk to Broughton, we have included context and comment below related to these upstream connected developments. The following sections demonstrate why this site should be withdrawn from further consideration for development.



[1] https://www.cambridgeshire.gov.uk/business/planning-and-development/flood-and-water/community-flood-action-programme/community-flood-groups

[2] https://www.cambridgeshire.gov.uk/asset-library/Broughton-December-2020-Flood-Investigation.pdf



Figure 1: Photos of Causeway Road during past flood events. Access to *Land off Causeway Road (CfS 153)* is to the right of the final photograph at one of the deepest points of flooding

Broughton is already at high risk of flooding

Cambridge County Council's Section 19 report of the December 2020 floods, when 16 properties were flooded internally as well as external flooding of gardens, outbuildings, and roads, states that *"Areas of Broughton have flooded multiple times in recent years from both Bury Brook and surface water".* Broughton Flood Action group reports the low-lying Causeway and Bridge Roads to the Police a number of times each year since they flood to depths which leave cars stranded and pose a danger to life in deep and fast flowing water (see photos).

The EA and CCC provide ongoing support to the village via the Broughton Flood Action Group who have invested in pumps, wet vacuum cleaners, personal protective equipment and watercourse maintenance equipment. The community flood action plan has been approved by the EA. CCC is currently undertaking a project for 16 key locations across Cambridgeshire, including Broughton, to determine the feasibility of flood mitigation and ultimately to develop a programme of works. These ongoing endeavours would be nullified by increased risk from the proposed upstream development, highlighting a lack of joined up thinking between HDC and these Risk Management Authorities.

If further evidence of the trauma that being flooded causes, the following is a reflection of one resident of Broughton following December 2020:

"The flooding of one's home will have significant psychological effect by disrupting physical security and emotional well-being. The effect will be both immediate and long-lasting.

It is difficult to understand the shock and disbelief unless one's home has been flooded. The unexpected sight of seeing one's home being destroyed can overwhelm the ability to process the situation, leaving one feeling confused and emotionally numb. The loss of personal belongings, displacement and uncertainty about recovery will lead to anxiety and ongoing feelings of unease.

The loss of possessions and sentimental items can cause grief, because a home is a symbol of stability and identity where individuals have made emotional connections. Experiencing a flood can cause flashbacks and heightened sensitivity to every new rainfall event. The physical disarray of a flooded home can cause a feeling of isolation and a loss of control.

The recovery period can be long and difficult with a further emotional strain which is not always recognised by those who have not been flooded."

HDC Further Issues and Option 2024: Tackling Flooding and Water: The following is highlighted in the What you Told Us section but does not appear to have been taken into account in the current selection of sites in and upstream of Broughton:

- Avoiding development in high-risk flood areas, prioritising brownfield development
- Avoiding sites that are reliant on flood defences or ensuring that they are sufficiently resilient to remain safe
- Considering catchment based, up and down-stream impacts and cumulative impacts of development for flooding and water issues

The history of flooding in Broughton, partly evidenced by the ongoing support of Risk Management Authorities for our community through the Broughton Flood Action Group, demonstrates that development should be avoided both within Broughton (Land off Causeway Road (CfS 153)) and upstream (Hungary Hall Farm (CfS 47), Lodge Farm (CfS 256) and Sapley Park Garden Village (CfS 197)).

The available modelling of the Bury Brook underestimates our current and future flood risk

The Environment Agency (EA) flood modelling of the Bury Brook, which is used on https://flood-map-for-planning.service.gov.uk/ and in the *Huntingdonshire Integrated Water Management Strategy: Level 1 Strategic Flood Risk Assessment* (SFRA) very likely underestimates the risk along the river, including to Broughton. Broughton Flood Action Group have been assisting the EA to undertake channel survey in 2024. The EA provided this assessment of the 2016 model (used, for example, to delineate the functional floodplain in Appendix D of the SFRA):

The current model is almost 10 years old now and it was based on a survey from the early 1990's which is outdated and not reflective of the catchment as it is today. There is also a lack of gauge data within the catchment, leading to a lot of uncertainty within the hydrology for the modelling. We have not been able to do anything regarding the gauge data but at least we do have the new survey to remove some of the uncertainty. The model does not fully reflect the flood history with a number of properties that we know to have flooded not being shown to be at risk…. Once we have an improved baseline model, we can look at whether there are any viable options which could potentially help reduce the flood risk to the village.

Since the 1990s, the EA have ceased to dredge the channel so that it conveys less water which has increased flood levels. Further, climate change projections have increased since 2016 so that the model likely underestimates the frequency and severity of flooding. The new EA model is due in Autumn 2025 and, until this new model can be used, any assessment is likely to underestimate risk. Nonetheless, even based on the existing data, the SFRA Appendix C Development Site Assessment Spreadsheet recommends withdrawal of

all four sites in and upstream of Broughton from the Local Plan. Reassessment using updated model data will further confirm these recommendations which HDC is urged to follow.

HDC Further Issues and Option 2024: Tackling Flooding and Water, and the Huntingdonshire Integrated Water Management Strategy: Level 1 Strategic Flood Risk Assessment: All consideration of flood risk in the Local Plan, including the SFRA Appendix C Development Site Assessment Spreadsheet and the Appendix D Delineation of the Functional Floodplain is based on outdated modelling and likely to underestimate existing and future flood risk from the Bury Brook, including to Broughton. Once the new EA model is available from Autumn 2025, the flood risk as currently stated is likely to increase. This will further strengthen the existing assessment made in Appendix C of the sites within the Bury Brook catchment which recommended:

- Land off Causeway Road (CfS 153): Withdraw from allocation
- Hungary Hall Farm (CfS 47): Withdrawal as site is within Flood Zone 3b
- Lodge Farm (CfS 256): Withdrawal as site is within Flood Zone 3b
- Sapley Park Garden Village (CfS 197): Withdrawal as site is within Flood Zone 3b

We strongly recommend that HDC follows the advice of the SFRA and removes this site from further consideration in the Local Plan, given that updated modelling is most likely to strengthen these existing recommendations.

Climate change is already increasing flood risk

As quoted in the Huntingdonshire Integrated Water Management Study SFRA, Government allowances for climate change uplifts on peak river flows in this area suggest that by the 2080s, peak flows will have increased by up to 39% compared to the 1981-2000 baseline. Similarly, peak rainfall events will have increased by up to 40% by the 2070s. The Bury Brook has a shallow gradient to the sea at Kings Lynn, with Broughton lying only about 15m above sea level; the same fall as across the proposed Hungary Hall Farm site. The Middle Level Commission (MLC) operate Europe's largest pump station at St Germans, with a major constraint being conveying flood flows to the station through the network of narrow rivers and pumps. Sea level is projected to rise by over 1m by 2100, further increasing the burden (at huge cost) of pumping to keep heavily managed MLC area, including the Bury Brook catchment, at its current level of flood risk. Any additional pressure on drainage through the MLC area, including through increased development in the Bury Brook catchment, will increase the risk of channels and pumps being overwhelmed or failing and is ultimately unsustainable.

As stated in Section 3.3 of the Huntingdonshire Integrated Water Management Study SFRA:

Local plans should [apply the NPPF] by safeguarding land from development that is required, or likely to be required, for current or future flood management; and to seek opportunities for the relocation of development, including housing, to more sustainable locations from areas where climate change is expected to increase flood risk.

Modelling of climate change on Bury Brook flood risk has not been undertaken to inform the Local Plan and it has already been shown that the existing modelling, which is used as a proxy for climate change in Section 4.7.2 of the SFRA, underestimates risk. Any further assessment of climate impacts on flood risk at the sites in and upstream of Broughton should use the new EA model due Autumn 2025 and should consider 'without defences' modelling which should include failure of pumps through the MLC area and the subsequent impeded drainage of the rivers.

HDC Further Issues and Option 2024: Tackling Flooding and Water states that HDC will use the updated Level 1 SFRA to help decide where new developments should be and that the impact of climate change is an important consideration, with numerous reports that the risk to life from flooding could increase significantly. We agree with these statements and therefore request that the following proposed sites are withdrawn from further consideration:

- Land off Causeway Road, Broughton (CfS 153): since access is from the regularly flooded Causeway Road where there is already a risk to life from deep and fast flowing water
- Hungary Hall (CfS 47), Lodge Farm (CfS 256) and Sapley Park Garden Village (CfS 197): since any one or more of these developments will increase urbanised runoff to the Bury Brook catchment upstream of Broughton. This will further exacerbate the increased risk of flooding from climate change that will be hugely challenging for other authorities (including the Environment Agency, Cambridge County Council and the Middle Level Commission) to mitigate.

The cumulative impact of up to three major developments would be significant

The Local Plan proposes 3 major developments within the Bury Brook catchment which would convert up to nearly 500 ha of greenfield land to over 18,000 homes plus associated infrastructure. *The Huntingdonshire Integrated Water Management Study Appendix G Catchment-level assessment of Cumulative Impacts of Development on Flood Risk* assesses the development in the Bury Brook as having a Medium cumulative impact on flood risk. However, the following should be considered:

- Historic flood risk: The EA Recorded Flood Outline is known to under-report incidents of flooding and the zero postcode points for the Bury Brook in the historic flood outlines is clearly in error given the evidence of the CCC Section 19 Flood Investigation into the December 2020 flooding in Broughton, quoted in the main SFRA document in Sections 4.8.1 and 4.8.2.
- Sensitivity to increases in flood flows: As already stated, existing modelling underestimates flood risk from the Bury Brook and climate change should consider the future burden and potential failure of this heavily pumped catchment.
- Growth score: Whilst this is not defined in Appendix G, it is noted that the only two catchments given a HIGH score (Alconbury and Brampton Brooks, and the Bury Brook) are two which have experienced the most significant flooding. Out of all catchments, the Bury Brook has the second highest % area of growth (Alconbury has the highest). It is deeply concerning that HDC consider these two already flood-prone catchments suitable to propose the Highest level of development.

We would contend that this cumulative impact assessment is flawed and the Bury Brook should be re-classified as High overall RAG score with a rank far higher than its current position of 9th.

Huntingdonshire Integrated Water Management Study Appendix G Catchment-level assessment of Cumulative Impacts of Development on Flood Risk: Given the history of flooding, we request that the overall RAG score of 'MEDIUM' cumulative impacts of development on Broughton is revised upwards to 'HIGH', with its rank similarly revised upwards.

Since the Bury Brook has the second highest % area of growth of all sites assessed (8.67%), the MEDIUM rating appears to be because zero postcode points are in the historic flood outlines. As reported in the main SFRA Level 1 document in Sections 4.8.1 (fluvial) and 4.8.2 (surface water), Broughton has a significant history of flooding.

Further, it is deeply concerning that the Alconbury and Bury Brook catchments – arguably two of the most at risk catchments north of Huntingdon - have been selected for the highest scale of development, receiving a HIGH growth RAG scores in Table 2.4 of Appendix G.

Traffic

The Hungary Hall site is bordered by the A141, the B1090 and Bridge Road.

Access onto these roads and their available capacity to handle the additional traffic generated by this site, both during construction and when completed, need to be carefully considered.

The proposed site extends to the north within the Broughton Parish boundary. Traffic from development on this part of the site would be likely to use the local Broughton roads, including Bridge Road to reach the A141 and School Road to access the proposed A141 bypass via Kings Ripton.

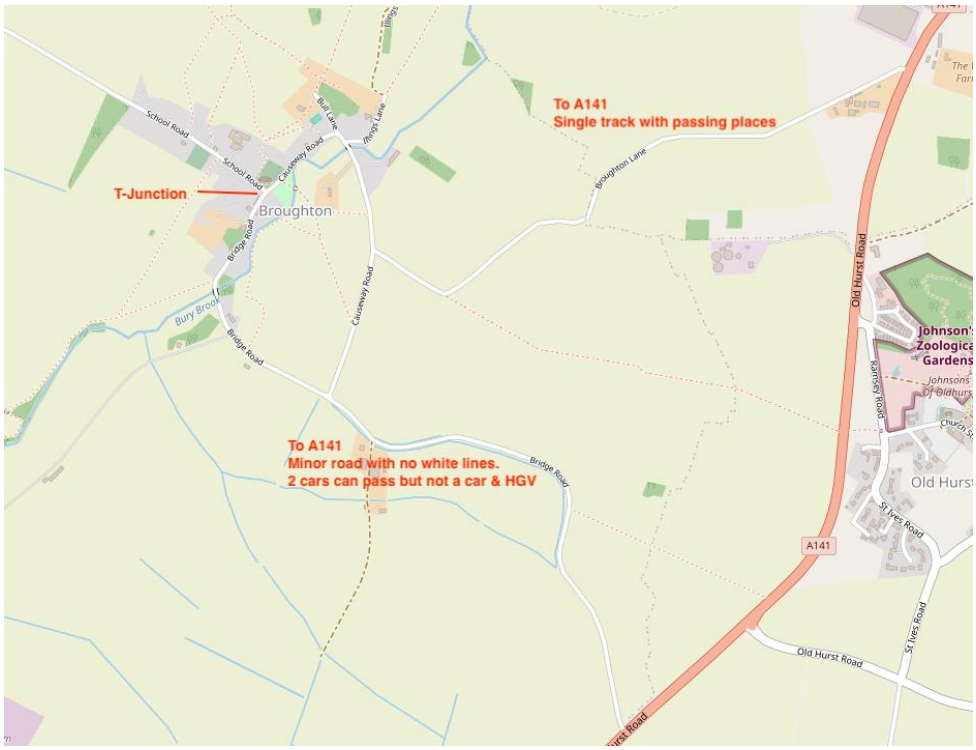


Figure 2: (c) OpenStreetMap

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Bridge Road is a narrow, minor, unclassified road with no road markings. The road has a 7.5 tonne advisory limit due to the bridge over the Bury Brook, which passes through Broughton. It is suitable only for low volumes of traffic, only just wide enough for 2 cars to pass on the highway.

Bridge Road leads into the centre of Broughton's conservation area, meeting School Road and Causeway Road at a T-junction in the centre of the village. This intersection has restricted visibility, particularly the Bridge Road / School Road corner, as shown in the photographs below. The Grade II listed churchyard wall at this intersection has been damaged by a vehicle collision.

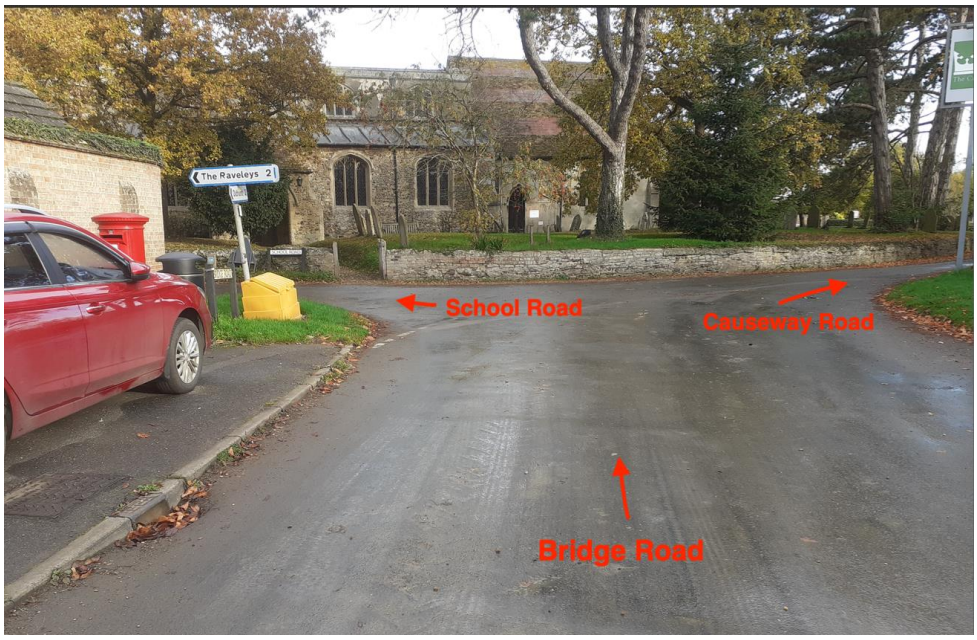


Figure 3: T-Junction from Bridge Road

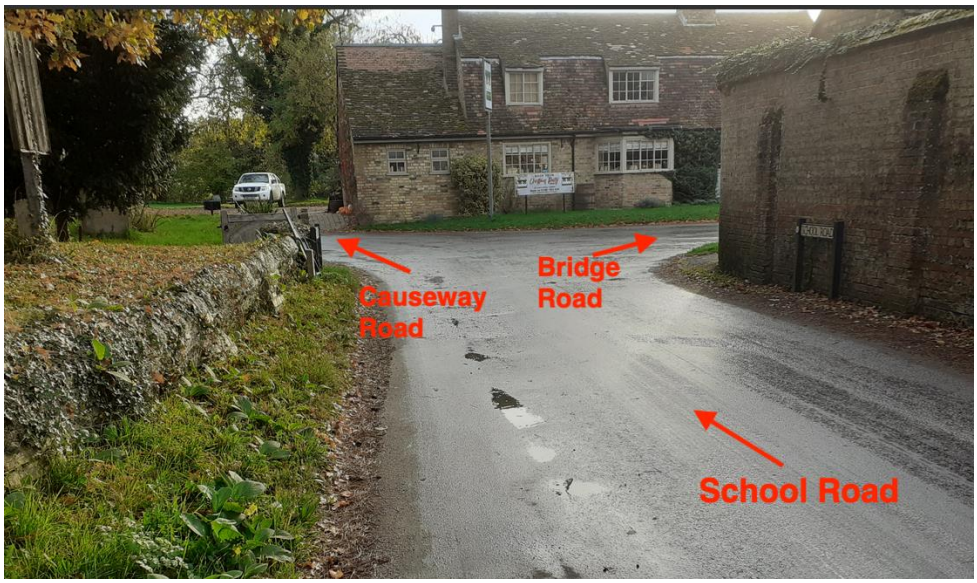


Figure 4: T-Junction from School Road

The village has very few pavements, with most pedestrian traffic on the unlit roads. Vulnerable pedestrians include residents of the village care home. The T-junction in the centre of the village only has pavement on the northwest side of Bridge Road. With restricted visibility for pedestrians and vehicles, and no pavement, this intersection is a particular safety concern.

Rat-run traffic using this road would be most likely to pass through the centre of the village, using the severely restricted visibility T-junction in the centre, to leave the village via School Road. Roads through the village are narrow and, for the most part, without pedestrian pavements.

While the designated access routes for the Hungary Hall development would presumably be onto the A141 or the B1090, we would expect to see a significant increase in rat-run traffic using Bridge Road through Broughton and then on through Kings Ripton to join the proposed A141 bypass near Sapley Park.

The A141 and St Ives Improvements Scheme consultation documents and information provided during a webinar have shown that little, if any, consideration has been given to A141 traffic north of the Wyton (B1090 intersection) roundabout or the consequential impact on nearby villages such as Broughton or Kings Ripton.

Traffic modelling does not appear to have addressed northbound traffic on the A141 or rat-run traffic through nearby villages. Similarly, the study, as described in the webinar, does not consider the additional traffic which would result from developments proposed in the Local Plan update for the Wyton-on-the-Hill area. The Hungary Hall development, sited on the Broughton-side of A141, would be particularly likely to generate large volumes of traffic through the village.

Services

This development would be separated from the rest of the current and proposed Wyton on the Hill by the A141.

Rather than considering the development as an integrated extension of Wyton-on-the-Hill, the development should be seen as a separate insular development with its own needs and impacts.

These needs, such as education, local convenience shopping, community and leisure infrastructure to support sustainable lifestyles for any future residents would not be readily met by the villages of Broughton and Kings Ripton. Residents in the Hungary Hall development would then need to travel, probably by car. This would add to air, noise and light pollution and would increase traffic volumes on local roads.

Development on this site and the other Wyton area sites, including Lodge Farm (CfS 256) and Sapley Park Garden Village (CfS 197) will stress a range of public services in the area, including:

- Healthcare: local health care providers, clinics, and hospitals may not be able to handle demand, leading to longer waiting times, which has been experienced already. The phasing of the re-development of Hinchingbrooke hospital needs to be considered against the proposed timescales for development of the Wyton area sites. GP resources in the area are already under pressure and additional facilities and GPs will be required to support the increased population.
- Schools: again, phased construction of new schools on the site would need to be considered to avoid overwhelming existing facilities.

Provision of some facilities on the site has been suggested in the Land Area Assessment, however, a development of this size would not be self-sufficient, so many of the travel impacts would still arise.

The A141 and St Ives Improvements Scheme consultation documents do not consider the needs of sites put forward for consideration in the Local Plan Update. Demand for public transportation may increase especially if the nearby housing doesn't include sufficient transport options. While this can lead to improved services it could also strain existing resources if not properly planned.

Though indirect, the increased population in the area may stress local utilities like water and waste management.

Environment

The dark night skies contribute to both the character of the village and to wildlife, as night hunting birds and mammals frequent the open spaces in and around the village. The large scale, nearby street and amenity lighting associated with the Hungary Hall development would raise light pollution levels dramatically in the village.

Broughton sits in a shallow valley so development on the Hungary Hall site, even if limited to the southernmost 30% of the site, is likely to interfere with the *long ranging vistas out of the Conservation Area into the surrounding countryside* identified as being one of the key elements contributing to give the village its sense of place in the Character Statement.

Again given Broughton's position in a shallow valley, the effects of noise pollution arising from the 4,000+ new dwellings, schools and businesses would significantly impact Broughton's significant heritage assets.

Comments on the Site Appraisal

We have considered the ratings given against each of the criteria in the Site Appraisal. For some of the criteria we believe that, based on local knowledge, the ratings given may not be appropriate:

SA2: *(Concentrate new development in locations that maximise opportunities to adapt and be more resilient to the unavoidable impacts of the climate emergency?)*

Although being in a location where the development itself will not be at risk of fluvial flooding, as has been shown above, the development will add considerably to the risk of flooding downstream.

We recommend that the '++' rating given to this parameter be revised to '-' or '- -' to reflect the consequences of development on this site.

SA3: *(Minimise the risk of flooding from all sources?)*

It is clear that the Sustainability Appraisal has taken a very narrow view of flooding and the commentary on objective SA3 for each site refers only to proportions of the site within different flood zones whilst ignoring flooding pertaining to site access or to existing development downstream. Commentary on SA3 for Hungary Hall Farm (CfS 47), Lodge Farm (CfS 256) and Sapley Park Garden Village (CfS 197) should consider downstream impacts of such huge development on flood risk. Recommended score '–' instead of '+'

SA5: *(Focus development in areas which are either well served by publicly accessible open and natural green space or have the capacity to provide additional such space?)*

The '*relatively close proximity to the extensive publicly accessible open and natural green spaces of the Ouse Valley*' would not seem to justify a '++' assessment. Ouse Valley amenities are not contiguous to the site and access to them will depend on private transport.

SA7: *(Promote opportunities to protect and enhance valued landscape and townscape characteristics?* And *Reinforce local distinctiveness and a sense of place?)*

We have highlighted the severe detrimental impacts on the significant heritage and environmental assets of Broughton which would result from development on this site, particularly if the development extends northwards towards Broughton. We recommend that these objectives be given a '- -' rating due to the visual, noise and light pollution from the development.

A '- -' rating would also reflect the likelihood of subsuming Broughton into the growing Wyton conurbation as development continues.

SA8: (*Facilitate the minimisation of light, noise and odour pollution, in particular on the rural environment*)

The '-' rating assigned to the objective does not give sufficient weight to the light pollution and noise which would be produced by 4,000+ dwellings with associated traffic and streetlighting. This objective should be assigned a '- -' rating.

SA9: *(Facilitate the delivery of the district's housing needs in sustainable locations that meet the community's needs?)* The current A141 and St Ives Improvements Scheme scope does not include any additional traffic from this site, nor does it consider increases in rat-run traffic on local, minor roads. This objective has been rated as '++', partly on the basis of access to the B1090 and A141. Without also considering the facilities required to support the proposed new community, this is insufficient to demonstrate that this location is sustainable – the road alone is not sufficient.

With the current A141 and St Ives Improvements Scheme only considering east-west traffic movements and excluding the A141 north of the Wyton (B1090) roundabout, there is a significant risk that traffic conditions may worsen, not improve north of the Wyton roundabout.

The '++' rating given depends on unproven improvements in transport and resources, including healthcare. We recommend that a '-' or even '- -' rating would be more appropriate without additional committed future provision of resources to meet the community's needs.

SA10: *(Maximise opportunities for access to existing or proposed social and community facilities and services?)* The rating of ++ refers to *social and community facilities* which *would be expected to be developed*. This is based on a presumed provision of facilities. Until such facilities are planned, this is speculative and we would suggest that a '-' rating would be a more appropriate rating, based on *existing or proposed facilities and services*. The '++' rating also cites the Crown Inn and village church as providing social and community facilities. These do so, for a village of around 100 dwellings, and are not of a scale to support 4,000+ dwelllings.

SA15 (*Retain the character of existing settlements?*) & **SA16** (*Conserve and where possible enhance sites, features and area of archaeological value throughout the district?)*: Given the major concerns regarding the detrimental impacts on Broughton's heritage assets we recommend that these be rated '- -' not '-'.

Conclusions and Recommendations

In summary, the above has demonstrated that:

- As a greenfield site comprising mostly Grade 2 agricultural land the site is an irreplaceable resource, and its development would be contrary to NPPF and DEFRA policies
- The site has no natural boundaries within it and progressive encroachment of Broughton would be likely.
- Development of the Hungary Hall site would have severe consequences for flooding downstream, including in Broughton, Wistow and Bury:
  - The cumulative impact of up to three major developments would be significant and this has been severely underestimated in the assessment provided to HDC and will further exacerbate the impacts of climate
  - Climate change is already increasing flood risk and will continue to do so through sharp increases in rainfall runoff and sea level rise which puts increasing pressure on the Bury Brook catchment which can only be effectively drained by pumps
  - The available modelling of the Bury Brook underestimates our current and future flood risk, as evidenced by the views of the Environment Agency who are updating the outdated model
  - Broughton is already at high risk of flooding, as evidenced by past documented flooding of properties and roads and through ongoing support and efforts of the Risk Management Authorities to reduce flood risk to the village
- The proposed Hungary Hall development could lead to a dangerous increase in traffic through the village:
  - The A141 and St Ives Improvements Scheme has not, as far as we are aware, considered the traffic increases from this site during the construction, or after completion, and has not considered impacts on minor roads nearby, including those through Broughton.
  - Any, as yet unplanned, improvements to the A141 north of the Wyton roundabout would need to be in place in time to mitigate increases in traffic. Given the current scope and timescales for the A141 improvements, this seems unlikely.
  - Broughton's local roads are unsuitable for increased traffic on this scale. As the roads pass through a conservation area, they cannot be readily improved to safely accommodate additional traffic.
- The Hungary Hall development would be isolated from the rest of the Wyton on the Hill developments by the A141. Hungary Hall residents would be dependent on personal transport to access necessary services.
- Environmental impacts on Broughton's Conservation Area would be severely negative, including noise and light pollution. The visual intrusion of the development would damage characteristics of the Conservation Area identified as fundamental in Huntingdonshire District Council's Character Statement.

We strongly recommend that Hungary Hall Farm (CfS 47) is withdrawn from consideration

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Yours sincerely,



Michael O'Donovan
Chair of Broughton Parish Council

clerk@broughtoncambspc.org.uk

Copies to: Broughton Parish Council

Broughton
Parish Council

Appendix: Broughton Village – Conservation Notes

History and Origins of the Village

Broughton is a picturesque and historic village situated in a secluded shallow valley with its roots dating back to the Anglo-Saxon period. Its name is derived from "broc", meaning a brook, and "tun" meaning a farm or settlement. The name "Broughton" suggests a settlement by a stream or brook. Bury Brook is the main watercourse running through the village.

After the Norman Conquest records trace the ecclesiastical ownership of the village back to the Abbot of Ramsey. Broughton grew as a rural farming community and in 1539 ownership was granted to the Cromwell family. The village has three main routes (Bridge Rd, School Rd and Causeway Rd), all of which converge at a central point opposite All Saints' Church and the Crown Inn public house. There are few pavements throughout the village.

Architectural Features and Significance

The village saw an increase in the construction of brick-built houses and farm buildings in the 17th Century in addition to many workers' thatched cottages, all of which evolved into the present conservation area. Many buildings are listed Grade II, with the church listed as Grade II*, featuring many varying chimney styles, dormer windows, and farm buildings. The styles vary from medieval to Dutch and modern.

The church stands as a focal point and the prominent feature of the village. The interior of the church retains much of its original charm with several medieval paintings of important historical value.

Environmental Importance

Broughton is situated in a landscape of much environmental significance with the surrounding countryside providing valuable habitats for wildlife. The village is surrounded by farmland, meadows and grass wetlands. The brook adds to the village's charm and plays an important role in supporting biodiversity in the area including hedgerows and grasslands rich in wildlife. The conservation area helps to protect the area from unsympathetic development ensuring that the rural character of Broughton is preserved.

Flooding Damage to Buildings

Most of the old buildings in Broughton are homes to families, not simply "quaint" historical curiocities. The addition of extra buildings near or around older structures can cause significant flooding damage:

a. **Increased Surface Runoff.** The introduction of more buildings will result in less permeable ground thereby reducing the area for water to naturally soak into the soil. Rainwater will run off into the surrounding environment, probably overwhelming existing drainage systems, and leading to flooding in areas near older buildings, especially buildings in the conservation area. Buildings that were never designed to cope with any possible increase in volumes of surface water.

b. **Obstruction of Natural Drainage.** New developments can block natural flow paths of minor streams or stormwater channels causing water to accumulate around older buildings. Any increase water pressure on foundations and walls can cause structural damage.

c. **Higher Groundwater Levels.** The construction of additional new buildings adjacent to the conservation area can raise the water table. This can lead to moisture penetration into the foundations of older buildings causing rising damp, mould, and the deterioration of wooden sole-plates and daub-and-wattle walls. Erosion of soil near older buildings can cause shifts in the settlement of a building's foundations leading to cracks and possible structural failure.

d. **Inadequate Flood Prevention Measures.** Older buildings in the conservation area were frequently constructed without modern flood mitigation measures such as water barriers and damp proofing. Additional unplanned surface water can overwhelm these outdated systems and allow water to seep into the structure.

e. **Pressure on Local Infrastructure.** The addition of extra new buildings near older buildings can disrupt natural water flow and introduce new pressures on existing older buildings. This will increase the risk of flooding and subsequent damage.

Conclusion

Broughton is a quintessential example of a rural English conservation village, with its rich history, unique architecture, and environmental importance. The architectural charm of its listed buildings reflects the village's history, while ongoing conservation efforts aim to protect buildings and the natural environment from modern challenges including flooding and climate change. Broughton's strong sense of community and commitment to heritage preservation will ensure that the villages will continue to thrive without the risk of encroaching development.