

From: Gdaniec Kasia <Kasia.Gdaniec@cambridgeshire.gov.uk>
Sent: 27 March 2019 12:55
To: ArchaeologyDC
Cc: PLServices
Subject: 19/00427/SCOPE Scoping Response from CCC HET_SUNNICA ENERGY FARM & CONNECTIONS

Dear Andrew,

Sunnica Ltd's EIA scoping report for Sunnica Energy Farm announces the scheme as a Nationally Significant Infrastructure Project (NSIP) comprising two grouped developments - Sunnica East near Worlington in Suffolk and Sunnica West comprising two sites in Cambridgeshire: Sunnica West South to the south of Chippenham Park and Sunnica West North to the west of Chippenham Park. Three large solar farms (one a "super" farm) of ground-mounted photovoltaic panel arrays are to be connected via buried cables to the Burwell National Grid Substation Extension and would provide 500 megawatts of electrical generation capacity. The whole scheme of conjoined solar farms is to be covered by a single Development Consent Order application.

The scoping report indicates groups who have already been consulted over the proposal. Of relevance to historic environment matters, ECDC, Historic England and Suffolk County Council are among the consultees already contacted and I note that Cambridgeshire County Council is shortly to be included in further round of consultation. Historic environment colleagues in Suffolk will provide advice to Suffolk County Council and Cambridgeshire County Council's Historic Environment Team will need to collaborate and co-operate with our local authority partners in Suffolk over this boundary-crossing scheme.

The objective of the solar farm/renewable energy development is to enable UK Government's commitment to cut climate emissions and create a sustainable low carbon economy.

If the DCO application gains consent following submission in summer 2020 and examination in Winter 2021, construction would commence in Spring 2022 and completion of the scheme is set for 2024.

As Archaeological Adviser to ECDC, we offer the following advice:

The development area within Cambridgeshire is located in an area rich in archaeological sites and monuments, including sites designated as Listed Buildings, Scheduled Monuments and registered Parks and Gardens as well as assorted non-designated heritage assets defining multiple periods of rural settlement and burial monuments extending back to the Neolithic period (c. 4,000BC).

The scoping report indicates that a baseline of evidence will be acquired through desk-based assessment as well as physical surveys (5.1.1). We welcome this approach as the evidence acquired will be able to "inform measures to avoid, reduce and, if possible, offset significant adverse effects" of the development identified during the EIA process (5.3.1).

Periodic review points have been considered for the purpose of the EIA (see *Assessment Years* 5.4.4 – 5.4.10):

2025 – proposed operational assessment year;

2040 - will be considered for specific topics including landscape and visual amenity, in terms of the maturation of vegetation (i.e. 15 years after the operational assessment year);
2065: the decommissioning assessment year,

We consider that it would be appropriate to incorporate an appraisal of historic environmental protection within this or a refined review schedule to determine the success of any historic environment mitigation measures developed for the scheme.

In addition, a long-term Historic Environment Management Plan should be developed for the ES. This should contain periodic review point for any areas that may see preservation in situ techniques applied to mitigate the impact of the scheme (including construction and maintenance of the scheme) on archaeological remains or to adjust the visual and landscape settings to protect designated heritage assets.

Matrices of effect significance will be used in the EIA to inform on beneficial or adverse environmental effects of the scheme. Our experience with effect significance shows that such impacts can only be reliably measured if suitable evaluation of the scheme area has been undertaken and all evidence is used: that is, currently known evidence as well as that newly acquired from the physical evaluation of the scheme area. We welcome the inclusion of field investigation (7.6.9, and see NPPF policies below) to augment and refine desk-based data and agree with the statement at 7.4.11 and elsewhere that recognises the lack of previous archaeological investigation in large parts of the scheme, which are, therefore, characterised as having unknown archaeological potential. The development of a reliable and efficient Cultural Heritage Mitigation Strategy can only be developed if evidence from a variety of sources has been used to understand the fragmentary evidence of past land uses. Such a strategy will also enable greater ability of archaeological contractors to more accurately cost mitigation schemes.

It is noted that evidence recorded on the Portable Antiquities Scheme database will augment the baseline data set (7.6.7), and this is endorsed here. When set against the physical remains of archaeological sites and monuments, an appraisal of the context of stray and metal-detected finds of all material types increases understanding of archaeological significance. As individual items, they are unable to adequately inform on significance: by period, their collective presence illuminates patterns of past activity. We, therefore, encourage a more synthetic approach to assessing the evidence base that seeks to discuss archaeological evidence as being where and how people in the past lived, worshipped, worked and were buried than by representation in table form of the significance of individual assets. Use of this approach may reduce any contention over professional judgement regarding the definition of heritage assets as "not significant" (see Table 7-1 and 7.6.2) and we would encourage "professional judgement" to be collectively agreed rather than presented as a statement of fact.

As major impact developments, NSIPs should include a robust public engagement strategy enabling participation, information sharing and display. We advocate the inclusion of such a strategy in the ES based on evidence of the benefits of outreach with other NSIPS or similar large projects.

Finally, NSIPs tend to produce voluminous archaeological archives. A strategy to store (physically and digitally) and use such archives should be present in any mitigation scheme.

We look forward to engaging with Sunnica Ltd's heritage consultants to discuss EIA methods and the scope of investigation in due course.

Regards,

Kasia

Kasia Gdaniec
Senior Archaeologist

**Historic Environment Team
Environment & Commercial Services
Cambridgeshire County Council
SH1011 Shire Hall
Cambridge, CB3 0AP
Tel: 01223 728568
Web: www.cambridgeshire.gov.uk/archaeology
Please see our website for CHET service charges**

Annex: Relevant NPPF policies:

Paragraph 194 of the National Planning Policy Framework (NPPF, 2018) indicates that the consideration of harm caused by development and its impacts to designated heritage assets require clear and convincing justification:

194. Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:

- grade II listed buildings, or grade II registered parks or gardens, should be exceptional;
- assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional⁶³.

and footnote 63 extends this principle to archaeological remains that do not have statutory protection as designated assets but are of equivalent importance:

⁶³ Non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets.

The level of harm that might be caused to designated assets requires quantifying according to the guidance in paragraph 196:

196. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

while paragraphs 197 and 198 describe the balanced approach that should be taken in considering the effects of development on the significance of a non-designated heritage asset and how Local Planning Authorities should ensure that reasonable steps are taken to ensure that the development can proceed after the loss of non-designated heritage assets. In order to do this, Paragraph 199 instructs:

199. Local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible⁶⁴. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted.

⁶⁴ Copies of evidence should be deposited with the relevant historic environment record, and any archives with a local museum or other public depository.

In order that an understanding and quantification of historic environment resources, both known and unknown at this stage, paragraph 189 sets out how an applicant must present evidence on

the character and significance of known heritage assets in desk-based assessment format as well as through field evaluation, where necessary.

189. In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

-----Original Message-----

From: PLServices@eastcambs.gov.uk [mailto:PLServices@eastcambs.gov.uk]

Sent: 21 March 2019 17:43

To: ArchaeologyDC <ArchaeologyDC@cambridgeshire.gov.uk>

Subject: Scoping Request Notification 19/00427/SCOPE

Please see attached Document

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19(00421)

Denise Ison

From: French Sheryl <Sheryl.French@cambridgeshire.gov.uk>
Sent: 03 April 2019 15:49
To: PLServices; Andrew Phillips
Cc: Julian-Smith Claire
Subject: RE: Comments on Sunnica Energy proposal for 500MW scheme

Hello Andrew and Mickey,

Thank you for the opportunity to comment on the Sunnica Energy Farm, Environmental Impact Assessment Scoping Report.

My understanding is that the scoping report will inform the various studies that are required as part of the EIA and you are inviting comments on this document to inform the methodologies for the various studies.

On the basis that experts on landscape, biodiversity, heritage, transport etc will put forward comments, mine are more general.

The scheme

1. The square metres, miles or hectares of total land take for the scheme is unclear from the scoping report. It is difficult to get a sense of the scale of land taken from the development.
2. The extension to the Burwell Substation is not clear - where and how much land will be required for this extension and is the land under option for this scheme?

Cumulative effects with other development

1. Please include the following developments in your long list 5.6.10
Triangle Farm, 12MW Solar Park, south west of Soham - operational since 2017
North Angle Farm, 37MW Solar park, south west of Soham – proposed Pre-App discussions April 2019 due to be built by March 2021 at latest

Climate Change

1. Table 6-2 Climate impact parameters. Temperature change has been identified as out of scope. This may be the case globally but it may be worth considering local/micro climate temperature changes associated with significant levels of solar PV panels.

Landscape, cultural heritage

1. The impact of such as large scheme on the landscape is significant – its scale does change the local setting for the next 40 years.

Transport/Jobs created during construction

1. It will be helpful to get an understanding of the scale of jobs that will be created during construction to estimate their impact on travelling to site in addition to the HGVs.

Other

- It will be helpful to understand the volume of land that will be taken out of agriculture for growing food, as the size of the scheme will likely start debates over food security v energy crops.
- How does solar at this scale fit into the government's energy strategy for baseload provision? And is this the first scheme of this scale for solar PV?

I look forward to hearing from you on the next steps with the development and any input we can provide.

Yours sincerely

Sheryl French

Sheryl French
Project Director, Mobilising Local Energy Investment
Cambridgeshire County Council, #MLEI
sheryl.french@cambridgeshire.gov.uk
T: 01223 728552
www.mlei.co.uk

From: PLServices <plservices@eastcambs.gov.uk>
Sent: 01 April 2019 11:32
To: French Sheryl <Sheryl.French@cambridgeshire.gov.uk>
Subject: FW: Comments on Sunnica Energy proposal for 500MW scheme

Good morning

I have checked with the Planning Team Leader, as Andrew not available, who confirms this is alright.

Kind regards

Mickey
PI Services

From: French Sheryl [<mailto:Sheryl.French@cambridgeshire.gov.uk>]
Sent: 29 March 2019 13:04
To: PLServices <plservices@eastcambs.gov.uk>
Subject: FW: Comments on Sunnica Energy proposal for 500MW scheme

Hello,

Please confirm that it is ok to submit comments by 3rd April?

Thank you

Sheryl

Sheryl French
Project Director, Mobilising Local Energy Investment
Cambridgeshire County Council, #MLEI
sheryl.french@cambridgeshire.gov.uk
T: 01223 728552
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From: French Sheryl
Sent: 29 March 2019 12:48
To: 'andrew.phillips@eastcambs.gov.uk' <andrew.phillips@eastcambs.gov.uk>
Subject: Comments on Sunnica Energy proposal for 500MW scheme

Hello Andrew,

Thank you for your request for comments sent 21st March 2019. I am keen to comment but can not provide these by Monday 1st April but hope to get these to you by the end of 3rd April 2019. Is that ok?

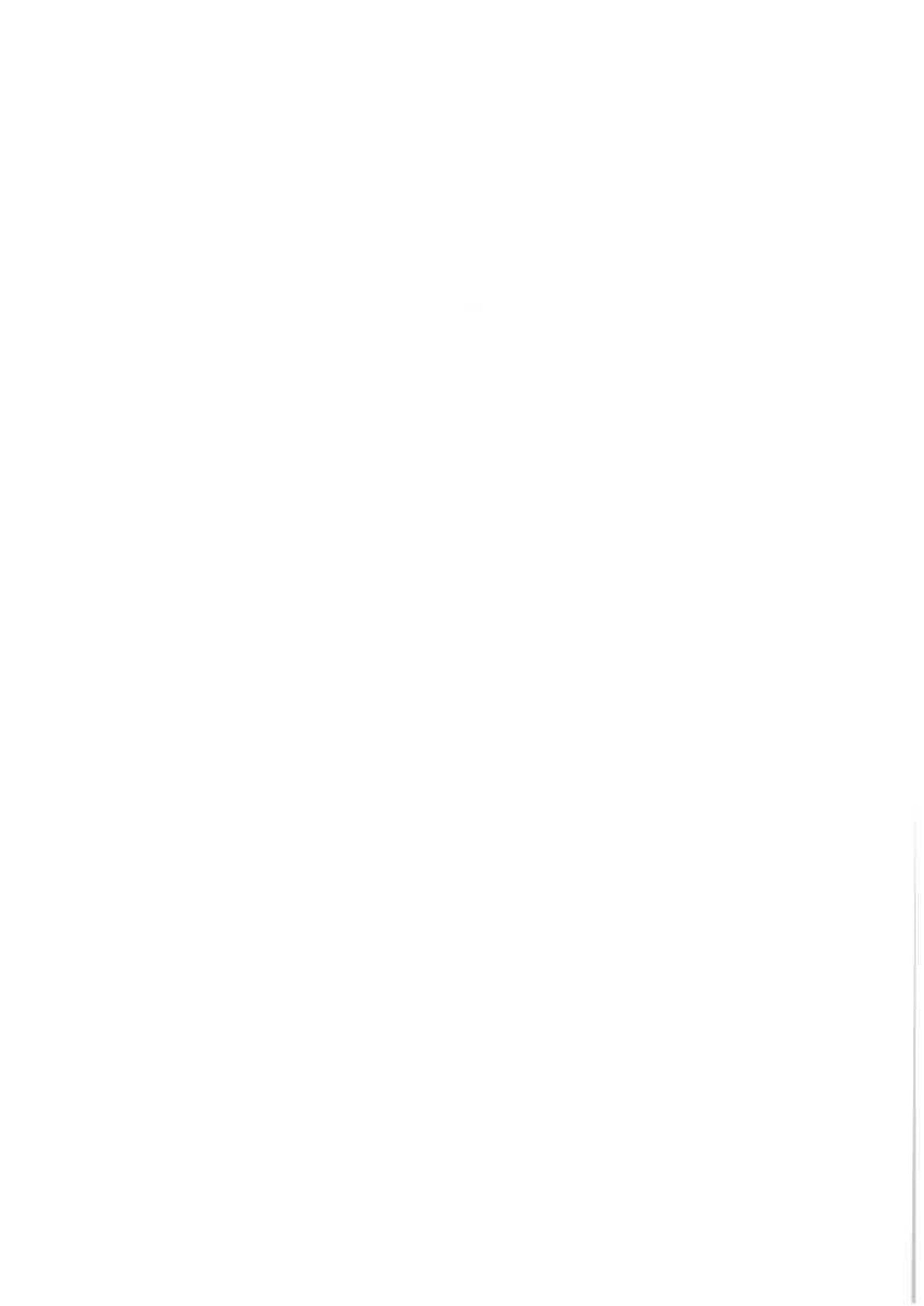
Kind regards

Sheryl

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Laura Thake

From: Andrew Phillips
Sent: 26 March 2019 10:56
To: PLServices
Subject: FW: 19/00427/SCOPE - Land North of Snailwell (West (North)) and Lane South of Chippenham Park (West (South)) including Connecting Network through to Burwell Sub Station and to Sunnica (East) in West Suffolk [OFFICIAL]

Andrew Phillips
Planning Team Leader

East Cambridgeshire District Council
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Phone: 01353 616359
e-mail andrew.phillips@eastcambs.gov.uk
Website: www.eastcambs.gov.uk

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From: ASTON, Carol 8171 [mailto:Carol.Aston@cambs.pnn.police.uk]
Sent: 26 March 2019 10:47
To: Andrew Phillips <Andrew.Phillips@eastcambs.gov.uk>
Cc: CPDT (Cambs) <CPDT@cambs.pnn.police.uk>
Subject: Ref: 19/00427/SCOPE - Land North of Snailwell (West (North)) and Lane South of Chippenham Park (West (South)) including Connecting Network through to Burwell Sub Station and to Sunnica (East) in West Suffolk [OFFICIAL]

Good morning Andrew

Our Ref: Cambs CPDT 182/19

Your Ref: 19/00427/SCOPE

Proposal: THE PLANNING INSPECTORATE - Scoping Opinion under the The Infrastructure Planning Regulations 2017 for Order granting development consent for the Sunnica Energy Farm.
Location: Land North Of Snailwell (West (North)) And Land South Of Chippenham Park (West (South)) Including Connecting Network Through To Burwell Sub Station And To Sunnica (East) In West Suffolk (Please See Figure 1-2)

Thank you for the opportunity to comment on the above Scoping Opinion – I am a designing out crime officer with Cambridgeshire Police and my comments relate to potential concerns regarding community safety and vulnerability to crime with this proposal.

I have noted the comments regarding fencing and security and support the proposal for security fencing. I would also ask that CCTV be deployed around the perimeter of the operational area of each site. Existing energy parks across Cambridgeshire do get targeted by thieves, both at the building stage and once the site is operational. I would also ask that consultation take place with this office at the appropriate time to ensure that vulnerability to

crime is addressed. I have also discussed this proposal with my counter terrorism colleagues and will keep them updated of developments.

I have no further comments at this stage, but this office is happy to work with the developers in this project.

Kind regards

Carol Aston
Designing Out Crime Officer (formerly ALO/CPDA)
Crime Prevention Design Team (Estates)
Cambridgeshire Constabulary
Hinchingsbrooke Park HUNTINGDON PE29 6NP
(Please note I do not work Mondays)

Direct Line – 01480 422432/07736 342333
Email us on cpdt@cambs.pnn.police.uk



To visit Cambridgeshire Constabulary's website please follow this link:

<https://www.cambs.police.uk/home.aspx>

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Thank you for your cooperation. (c) Cambridgeshire Constabulary

Michaela Willis

From: Phil Prigg [REDACTED]
Sent: 02 April 2019 19:25
To: PLServices
Cc: Planning West Suffolk; 'Jill Tuffnell'; 'Angela Ratcliffe'
Subject: sunnica west 02 04 19

Andrew Phillips

Planning Team Leader, East Cambs DC.

2nd April 2019

Dear Andrew

Application no: 19/00427/SCOPE:

Proposal: THE PLANNING INSPECTORATE – Scoping Opinion under The Infrastructure Planning Regulations 2017 for Order granting development consent for the Sunnica Energy Farm.

Location: Land North of Snailwell, (West (North)) and Land South of Chippenham Park, (West (South)), Including Connecting Network through to Burwell Sub-Station and to Sunnica (East) in West Suffolk.

Thank you for consulting the Ramblers on this proposal which, it is felt, will be controversial although, apparently, not yet in the public domain.

Purely from a Ramblers' viewpoint, I would make the following observations, but feel that we must take a neutral stance for the time being at least:

Sunnica West (South): there are no Public Rights of Way crossing this site but Snailwell bridleway no.5 runs immediately adjacent to the south-western boundary from the A14 to the eastern fringe of Snailwell village. The view of the site from the bridleway is limited at present by hedges and these should be retained, should the scheme go ahead, as should the old coach road to Chippenham Park, thought to be used for agricultural purposes, but with potential for recreational use in the future.

Route A corridor, (blue): this route is crossed by Snailwell footpath no.1, a very long field-edge cum crossfield path, linking Snailwell and Chippenham villages, with a spur to Fordham.

Sunnica West (North): again, there are no Public Rights of Way crossing the site and only Snailwell fp 1 in the vicinity. Noting 'Snailwell Fen' on the Ordnance Survey map and Chippenham Fen NNR, which becomes very wet, literally next-door, provokes a warning about the suitability of this site.

Route A corridor, (blue), continued : it appears that Fordham footpath no.19 will be crossed by this route, in the vicinity of both the A142 and the railway, presenting other challenges. The route onwards to Burwell falls outside my own Ramblers' territory.

Route B corridor, (green): this route will cross Chippenham footpath no 7 and, having entered West Suffolk, Freckenham, (Red Lodge) footpath no.3.

The rest of Route B and the Sunnica East site itself, are in the new West Suffolk area, still within my Ramblers' territory. I am, therefore, copying these observations to West Suffolk for information.

Yours sincerely

Phil Prigg

Group Footpath Secretary, Ramblers, Newmarket & district Group.



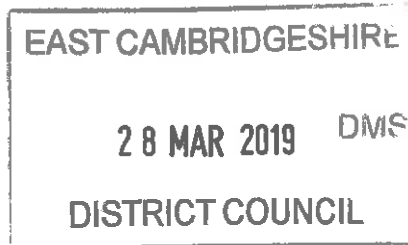
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SWAFFHAM INTERNAL DRAINAGE BOARD

ENGINEER: ANDREW NEWTON
CLERK: JEAN HEADING

DRAINAGE OFFICE
MAIN STREET
PRICKWILLOW
CAMBS. CB7 4UN
TEL: ELY (01353) 688296
FAX: (01353) 688561

Development Department
East Cambs. District Council
The Grange
Nutholt Lane
Ely
Cambs.
CB7 4PL



Our ref: AN/tlr

Your ref: Andrew Phillips

26th March 2019

Dear Sirs

Planning Application 19/00427/SCOPE
Sunnica Ltd – Land north of Snailwell and south of Chippenham Park, including connection network through Burwell
Scoping Opinion for development of energy farm

The three proposed energy sites are not within an Internal Drainage District. However, the proposed cable route to the substation site in Burwell will pass through the Swaffham Internal Drainage District.

It would appear that the cable will cross several of the Board's Main Drains. Under our Byelaws, the applicant will require the prior consent of this Board before works take place.

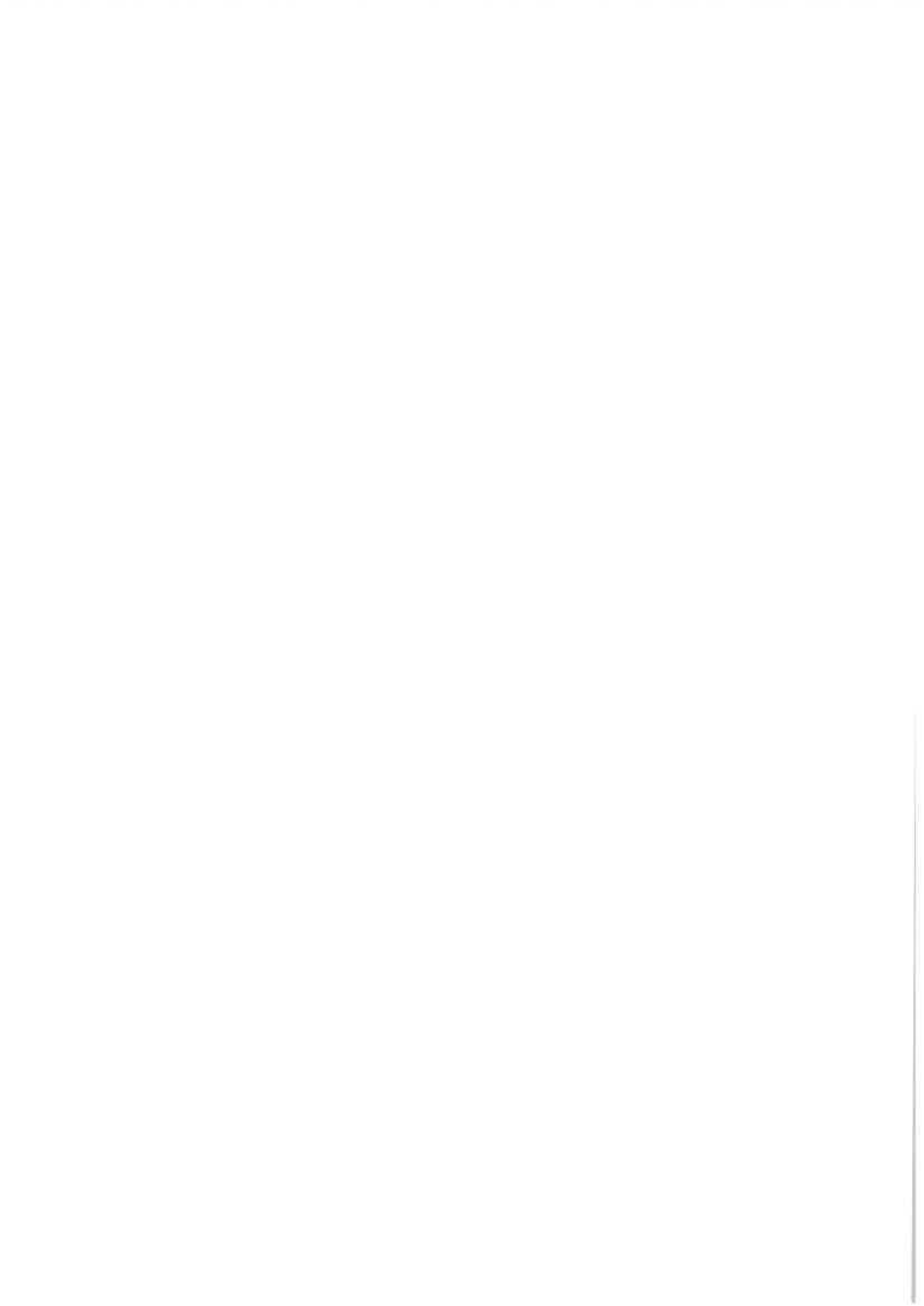
Therefore, the Board has no objections to this scheme in principle, providing the relevant consents are obtained.

Yours faithfully,



A Newton
Engineer

cc Everitt Kerr & Co



From:Andrew Phillips
Sent:18 Apr 2019 09:16:21 +0100
To:Bobbie Athinodorou
Subject:FW: 19/00427/SCOPE - THE PLANNING INSPECTORATE - Scoping Opinion under the The Infrastructure Planning Regulations 2017 for Order granting development consent for the Sunnica Energy Farm.

Andrew Phillips
Planning Team Leader

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From: Peter Ord
Sent: 17 April 2019 17:18
To: Andrew Phillips
Cc: PLServices
Subject: 19/00427/SCOPE - THE PLANNING INSPECTORATE - Scoping Opinion under the The Infrastructure Planning Regulations 2017 for Order granting development consent for the Sunnica Energy Farm.

Andrew

Proposal: THE PLANNING INSPECTORATE - Scoping Opinion under the The Infrastructure Planning Regulations 2017 for Order granting development consent for the Sunnica Energy Farm.
Location: Land North Of Snailwell (West (North)) And Land South Of Chippenham Park (West (South)) Including Connecting Network Through To Burwell Sub Station And To Sunnica (East) In West Suffolk (Please See Figure 1-2)
Reference: 19/00427/SCOPE

Thank you for consulting me on the above. I have read the EIA scoping report dated March 2019 produced by EACOM. I consider that any land contamination or air quality implications are likely to be low or negligible.

Regards

Peter Ord

Scientific Officer | Environmental Health

EAST CAMBRIDGESHIRE DISTRICT COUNCIL

The Grange | Nutholt Lane | Ely | Cambridgeshire | CB7 4EE

Tel: 01353 665555

We would welcome your feedback so that we can improve our service.

www.eastcambs.gov.uk

Our ref: L664668
Your ref: 19/00427/SCOPE

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Cambridgeshire
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Mark Norman
Operation - East
Woodlands
Manton Lane
Bedford MK41 7LW

Direct Line: 0300 470 4938

11 April 2019

Dear Sir/Madam

**TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE)
ORDER 2010**

PLANNING APPLICATION: 19/00427/SCOPE

**PROPOSAL: Scoping opinion under the Infrastructure Planning Regulations 2017
for Order granting development consent for the Sunnica Energy Farm.**

**LOCATION: Land north of Snailwell and land south of Chippenham Park including
connecting network through to Burwell Sub Station and to Sunnica in West
Suffolk**

Thank you for your correspondence, received on 25 March 2019, notifying Highways England of the above application.

Specifically, we would be concerned, not only, about how any cables are going to cross the Strategic road network but also construction traffic. Therefore, we would expect a Transport Assessment to be carried out in accordance with best practice and guidance laid out in Circular Roads 02/13 and Highways England's Planning Protocol. The content of which should be discussed with the Highway Authorities before any work is carried out.

Yours sincerely



Mark Norman
Assistant Spatial Planning Manager
Operations (East)
Email: mark.norman@highwaysengland.gov.uk

My ref: FR/19-000165
Your ref: 19/00427/SCOPE
Date: 11/04/2019
Doc no: 201103758
Officer: Harry Pickford
E Mail: harry.pickford@cambridgeshire.gov.uk

Place and Economy
Environment and Commercial

Andrew Phillips
East Cambridgeshire District Council
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CB3 0AP

Proposal: THE PLANNING INSPECTORATE - Scoping Opinion under the The Infrastructure Planning Regulations 2017 for Order granting development consent for the Sunnica Energy Farm.

Land North Of Snailwell (West (North)) And Land South Of Chippenham Park (West (South)) Including Connecting Network Through To Burwell Sub Station And To Sunnica (East) In West Suffolk (Please See Figure 1-2)

Comments from Lead Local Flood Authority (LLFA)

Dear Sir,

Thank you for your consultation which we received on 21 March 2019.

We have reviewed the following documents:

- Environmental Impact Assessment Scoping Report, AECOM Infrastructure & Environmental UK Limited, Dated: 12 March 2019

The Environmental Impact Assessment Scoping Report submitted includes information of the water environment proposals. The principles of surface water drainage outlined within the scoping report are acceptable, however as LLFA we expect a full flood risk assessment and/or surface water drainage strategy to be submitted to support any application which must include:

- Existing impermeable area
- Proposed impermeable area / developable area
- A description of site topography
- A description of ground conditions (using site investigation where possible)
- Identification of any surface water flood risk
- Existing site drainage arrangements
- Proposed method of surface water disposal and discharge location(s)
- Existing and proposed runoff rates
- Existing and proposed runoff volumes

- x. Required volume of attenuation (m^3 per m^2 of impermeable area)
- xi. Preliminary SuDS proposals
- xii. Infiltration test results in accordance with BRE365 (or second viable option for surface water disposal if testing hasn't yet been undertaken)
- xiii. Drainage layout drawings (including sub-catchment breakdown where application)
- xiv. Supporting hydraulic calculations
- xv. Details of proposed phasing
- xvi. Maintenance and management plan of the surface water drainage system (for the lifetime of the development) including details of future adoption

The applicant should, as part of the surface water strategy, demonstrate that the requirements of any local surface water drainage planning policies have been met and the recommendations of the relevant Strategic Flood Risk Assessment and Surface Water Management Plan have been considered.

Informatives

Infiltration rates should be worked out in accordance with BRE 365. If it is not feasible to access the site to carry out soakage tests before planning approval is granted, a desktop study may be undertaken looking at the underlying geology of the area and assuming a worst-case infiltration rate for that site. If infiltration methods are likely to be ineffective then discharge into a watercourse/surface water sewer may be appropriate; however soakage testing will be required at a later stage to clarify this.

Constructions or alterations within an ordinary watercourse (temporary or permanent) require consent from the Lead Local Flood Authority under the Land Drainage Act 1991. Ordinary watercourses include every river, drain, stream, ditch, dyke, sewer (other than public sewer) and passage through which water flows that do not form part of Main Rivers (Main Rivers are regulated by the Environment Agency). The applicant should refer to Cambridgeshire County Council's Culvert Policy for further guidance:

<https://www.cambridgeshire.gov.uk/business/planning-and-development/water-minerals-and-waste/watercourse-management/>

Please note the council does not regulate ordinary watercourses in Internal Drainage Board areas.

Parts of this site fall within the Swaffham Internal Drainage Board (IDB) district which is part of the Ely Group of IDB's. Under the Land Drainage Act 1991, any person carrying out works on an ordinary watercourse in an IDB area requires Land Drainage Consent from the IDB prior to any works taking place. This is applicable to both permanent and temporary works. Note: In some IDB districts, Byelaw consent may also be required.

Surface water and groundwater bodies are highly vulnerable to pollution and the impact of construction activities. It is essential that the risk of pollution (particularly during the construction phase) is considered and mitigated appropriately. It is important to remember that flow within the watercourse is likely to vary by season and it could be dry at certain times

throughout the year. Dry watercourses should not be overlooked as these watercourses may flow or even flood following heavy rainfall.

In order to assist developers with the preparation of surface water strategies Cambridgeshire County Council has prepared a guidance document which is available to view [here](#).

We also offer a [pre-application service](#) which enables developers to discuss their drainage proposals with the LLFA Officers prior to submission of a formal application.

Yours faithfully,



Julia Beeden

**Flood Risk & Biodiversity Business Manager
Environment and Commercial**

Please note: We are reliant on the accuracy and completeness of the reports in undertaking our review, and can take no responsibility for incorrect data or interpretation made by the authors.

If you have any queries regarding this application please contact the Officer named at the top of this letter (contact details are above).