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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,

J Beeden

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).