

Barbara Greengrass
East Cambs District Council
Nutholt Lane
Ely
Cambridgeshire
CB7 4PL

Our ref: AC/2016/124889/02-L01
Your ref: 16/01121/FUM
Date: 03 July 2017

Dear Ms Greengrass

**CHANGE OF USE OF AGRICULTURAL LAND TO INDUSTRIAL (CLASS B2) USE
AND ERECTION OF A CONCRETE MANUFACTURING FACILITY, WITH
ASSOCIATED ENGINEERING AND ACCOMMODATION WORKS AND
EXTENSION TO AN EXISTING BUILDING AND TRAVELLING CRANE RAILS.
LAND NORTH OF 190 WISBECH ROAD LITTLEPORT CAMBRIDGESHIRE**

Thank you for referring the above application which was received on 12 June 2017.

A copy of the subsequent decision notice would be appreciated.

National Planning Policy Framework Flood Risk Sequential Test

In accordance with the National Planning Policy Framework paragraph 101, development should not be permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding. It is for the local planning authority to determine if the Sequential Test has to be applied and whether or not there are other sites available at lower flood risk as required by the Sequential Test in the National Planning Policy Framework.

By consulting us on this planning application we assume that your Authority has applied and deemed the site to have passed the Sequential Test.

We have reviewed the information submitted and have objections with regard to flood risk and pollution prevention. Our comments have been split under their separate headings.

FLOOD RISK

We have reviewed the flood risk assessment (FRA) (ref: EWE Associates Ltd) dated 5 December 2016 for the proposed development and wish to make the following comments.

Environment Agency position

In the absence of an acceptable FRA we **object** to the granting of planning permission and recommend refusal on this basis for the following reason.

Reason

The FRA submitted with this application does not comply with the requirements set out in the National Planning Policy Framework. The submitted FRA does not therefore provide a suitable basis for assessment to be made of the flood risks arising from the proposed development.

In particular, the submitted FRA fails to:

1. Consider the most up-to-date flood risk information for the area.

Advice to the LPA/Applicant

The FRA submitted with this application is more than 6 months old and is therefore out of date. We have updated modelling in this area since our response to the original consultation was submitted. The data available includes breach modelling of the Ouse Washes and the Ely Ouse. The development site is shown to be affected by such a breach and therefore the data should be considered as part of the FRA to ensure a robust understanding of flood risk to the site.

Updated modelling data can be provided by our Customers & Engagement team. Please contact enquiries_EastAnglia@environment-agency.gov.uk to make a request for information.

Overcoming our Objection

Our objection can be overcome by submitting a revised FRA that addresses the issues outlined above and demonstrates that the proposed development will be safe for its lifetime and will not increase flood risk elsewhere.

POLLUTION PREVENTION

We object to the application as submitted because the applicant has not supplied adequate information to demonstrate that the risks of pollution posed to surface water quality can be safely managed. We recommend that planning permission should be refused on this basis.

Reason

'Policy ENV 9: Pollution' from the East Cambridgeshire Local Plan (2015) states that all applications for development where pollution is suspected must contain sufficient information to enable the Council to make a full assessment of potential hazards and impacts.

Environment Agency (East Anglia area - West), Sustainable Places Team, Bromholme Lane, Bampton, Huntingdon, Cambridgeshire, PE28 4NE
Email: planning_liaison.anglian_central@environment-agency.gov.uk
Customer services line: 03708 506 506



In this case we consider that the proposed development may pose an unacceptable risk of causing a detrimental impact to surface water quality because the applicant appears to have failed to address the subject adequately.

Overcoming our objection

As an industrial, manufacturing, development, with proposals for discharges to surface waters, we consider it standard and reasonable to expect the applicant to have identified (or eliminated) all foreseeable risks of air and water pollution, posed by both the construction and operational phases of the development, as well as appropriate measures to mitigate any risks identified. To overcome our objection this expectation should be satisfactorily addressed.

Informative

Discharges to surface waters, unless they consist wholly of clean, uncontaminated rainwater, will require an Environmental Permit, unless exempt. Guidance on permits for water activity discharges can be found on the gov.uk website, starting from <https://www.gov.uk/guidance/discharges-to-surface-water-and-groundwater-environmental-permits>.

The applicant is advised that the standard determination period for a water discharge activity environmental permit is 13 weeks.

We hope this is of assistance to you. If you have any further queries please do not hesitate to contact us.

Yours sincerely

Mrs Dawn Porter
Sustainable Places Planning Advisor

Direct dial 020302 51819

Direct e-mail planning.brampton@environment-agency.gov.uk