Dear Sir/Madam

RELOCATED RAILWAY STATION COMPRISING PLATFORMS, PEDESTRIAN BRIDGES, ACCESS ROAD, PEDESTRIAN AND CYCLE ROUTES, CAR AND CYCLE PARKING, WITH OTHER ASSOCIATED FACILITIES AND INFRASTRUCTURE. LAND BETWEEN CODY ROAD AND RAILWAY, NORTH OF WATERBEACH, CAMBS.

Thank you for your consultation.

An electronic copy of the decision notice would be appreciated.

Environment Agency position.
In the absence of an acceptable Flood Risk Assessment (FRA), we OBJECT to the granting of planning permission and recommend refusal on this basis for the following reasons:
The FRA submitted with this application does not comply with the requirements set out in paragraphs 102 and 103 of the National Planning Policy Framework. The submitted FRA does not, therefore, provide a suitable basis for an assessment to be made of the flood risks arising from the proposed development.

In particular, the submitted FRA fails to include adequate details of the breach modelling that has been undertaken to assess the flood risk at the site in the event of a breach of the River Cam flood defences.

Advice for the Applicant.
The FRA indicates that breach modelling was undertaken by Mott MacDonald in 2014, as part of an SFRA model review. The FRA states that this model was subsequently revised in 2017 to account for the new climate change allowances and to expand the model parameters to give a more accurate set of results. Although we attended a meeting with Mott MacDonald on 16 November 2017 to discuss this updated breach modelling, we have not received a copy of the breach model for us to review. As such, we are unable to determine if the results of this model, which have been used in the FRA, are acceptable.

Please note that following the meeting in November 2017, we advised Mott MacDonald that we would expect an assessment to be undertaken of the most appropriate breach locations for the site. As such, justification for the selection of breach locations used in the model should also be provided to us for review.

Advice for the LPA.
Sequential and Exception Tests.
Section 3.1 of the FRA provides information to allow your Authority to determine whether the proposed development passes the Sequential Test and whether a sequential approach has been taken to the location of the development within the site. Please note that the FRA indicates that
the proposed car parking area is classed as ‘water compatible’ but table 2 of the Planning Practice Guidance does not include car parking in the definition of water compatible development. Your Authority should determine which flood risk vulnerability classification the proposed car park falls into and whether the Exception Test needs to be applied as it is located within Flood Zone 3.

**Safe Access and Egress.**
Although the FRA considers the issue of safe access and egress in the event of a breach of the River Cam flood defences, it has not been demonstrated that safe access and egress is available. We consider that an assessment of the availability of safe access and egress should be undertaken using information from the breach model and the guidance provided in the Defra/EA document FD2321.

In all circumstances where flood warning and emergency response is fundamental to managing flood risk, we advise local planning authorities to formally consider the emergency planning and rescue implications of new development in making their decisions. As such, we recommend you consult with your Emergency Planners and the Emergency Services to determine whether the proposals can be considered safe, in accordance with the guiding principles of the Planning Practice Guidance (PPG).

**Overcoming our Objection.**
Our objection can be overcome by submitting the updated breach model to us for review, as well as justification for the selection of breach locations used in the model. Please note that if the model is not considered to be fit for purpose then we are likely to maintain our objection to this application.

**Other Environmental issues.**
In the eventuality that the applicant is able to overcome the Agency’s Objection we may wish to comment upon other environmental issues.

Yours faithfully

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Mr. T.G. Waddams  
Planning Liaison

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

**Does Your Proposal Have Environmental Issues or Opportunities? Speak To Us Early!**
More information can be found on our website [here](https).

**Please note** – Our hourly charge will rise to £100 per hour from 1st April 2018.