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 - FURTHER DETAIL.

We have reviewed the updated memo dated 24 May 2018 which has, in principle, addressed all the issues raised in our previous letter of objection.

Environment Agency position.
We are able to withdraw our Objection, on floodrisk grounds, to the proposed development subject to the following comments and recommendations.

The Internal Drainage Board should be consulted with regard to flood risk associated with their watercourses and surface water drainage proposals.

Environment Agency position – Flood risk.
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' development. However, 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).
We recommend that a condition is imposed on any planning permission requiring the provision of
a Flood Plan for the development, which should include an appropriate method of flood warning and evacuation to ensure the safe use of the development in extreme circumstances.

The Environment Agency does not normally comment on or approve the adequacy of flood emergency response and evacuation procedures accompanying development proposals, as we do not carry out these roles during a flood. Our involvement with this development during an emergency will be limited to delivering flood warnings to occupants/users.

We have reviewed the information as submitted and wish to make the comments below. Further information for the applicant can be found in the attached appendices.

Documents Reviewed.
Phase 1 Geo-environmental Preliminary Risk Assessment, Waterbeach Relocated Railway Station, Mott MacDonald, Ref: 328331/LC001/A, February 2018.

Site Specific Information / Comments.
The site is underlain by River Terrace Deposit (sands and gravels) Secondary A aquifer, which in turn overlie an unproductive strata. The closest surface water features are drainage ditches, unnamed pond and River Cam, located approximately, 175m to west, south & north, 280m to north and 580m to east of the site, respectively. The site is not located within a source protection zone. The entire site was previously used as farmland and there is a sewage treatment work located approximately 300m west of the site. Considering site settings, previous and current use of the site and surrounding lands, we consider the site to have a low sensitivity with respect to controlled waters.

Recommendations.
We consider that planning permission could be granted to the proposed development as submitted if the following planning conditions are included as set out below. Without these conditions, the proposed development on this site poses an unacceptable risk to the environment and we would wish to object to the application.

Condition (1). If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until the developer has submitted a remediation strategy detailing how this unexpected contamination shall be dealt with and obtained written approval from the Local Planning Authority. The remediation strategy shall be implemented as approved.

Reason (1). To protect and prevent the pollution of controlled waters from potential pollutants associated with current and previous land uses in line with National Planning Policy Framework (NPPF), paragraphs 109, 120, 121 and the Environment Agency’s approach to groundwater protection (available at: https://www.gov.uk/government/collections/groundwater-protection).

Advice to LPA (1). Contamination can still be missed by an investigation and this condition gives the Local Planning Authority the ability to require a new, or amendments to an existing, remediation strategy to address any previously unexpected contamination.

The Environment Agency will be pleased to assist in the assessment of proposals submitted by the applicant to meet these conditions.

Other Environmental issues.
Advice to the applicant.
Drainage maps for surface and foul water are required. The application proposes to have surface
waters drain via a soakaway. Further details are required: will the soakaway form part of a SUDS system, and have percolation tests been performed to ensure the soakaway has adequate capacity?

The applicant states that foul drainage will occur via non-mains sewerage, using a package sewage treatment plant. However, no reference is made to the effluent discharge point, appropriate sizing, and the need to obtain a permit.

Drainage is a material planning consideration and sufficient detail should be submitted to allow the Agency to fully assess the proposal and any risk to the water environment.

**Condition (2).** The development hereby permitted shall not be commenced until such time as a scheme for the disposal of foul and surface water has been submitted to, and approved in writing by, the local planning authority.

**Reasons (2).** The site is adjacent to a controlled watercourse and within a Source Protection Zone 3. We are unable to assess the risks of pollution unless a drainage scheme for foul and surface water is provided.

Foul Water Drainage hierarchy.
The applicant must provide evidence to your council that a connection to the public sewer is not feasible.

Other than very exceptionally, providing non-mains drainage as part of your Planning or Building Regulation application will not be allowed unless you can prove that a connection to the public sewer is not feasible. Non-mains drainage systems are not considered environmentally acceptable in publicly sewered areas. Please note that the existence of capacity or other operating problems with the public sewer are not valid reasons for non-connection where this is reasonable in other respects.

Where connection to the public sewer is feasible, agreements may need to be obtained either from owners of land over which the drainage will run or the owners of the private drain.

Government guidance contained within DETR Circular 03/99/ WO 10/99 ‘Planning requirements in respect of the use of non-mains sewerage incorporating septic tanks in new development’ gives a hierarchy of drainage options that must be considered and discounted in the following order:

> Connection to the public sewer
> Package sewage treatment plant (which can be offered to the Sewerage Undertaker for adoption)
> Septic Tank
> If none of the above is feasible a cesspool may be appropriate

The applicant should be aware of his responsibility to maintain the system to the manufacturer’s requirements and environmental regulations.

Consent for the discharge of effluent may be required from us. Further information can be found at [https://www.gov.uk/permits](https://www.gov.uk/permits). This is irrespective of any planning approval.

**The above detail must be submitted with any subsequent foul water drainage submission.**

Surface Water Drainage and Infiltration Sustainable Drainage Systems (SuDS):

The water environment is potentially vulnerable and there is an increased potential for pollution from inappropriately located and/or designed infiltration (SuDS). We consider any infiltration (SuDS) greater than 2.0 m below ground level to be a deep system and are generally not
acceptable. All infiltration SuDS require a minimum of 1.2 m clearance between the base of infiltration SuDS and peak seasonal groundwater levels. All need to meet the criteria in our Groundwater Protection: Principles and Practice (GP3) position statements G1 to G13 which can be found here: https://www.gov.uk/government/collections/groundwater-protection. In addition, they must not be constructed in ground affected by contamination and if the use of deep bore soakaways is proposed, we would wish to be re-consulted. The proposals will need to comply with our Groundwater protection position statements G1 and G9 to G13.

Only clean, uncontaminated surface water should be discharged to any soakaway, watercourse or surface water sewer.

Surface water from roads and impermeable vehicle parking areas shall be discharged via trapped gullies.

Prior to being discharged into any watercourse, surface water sewer or soakaway system, all surface water drainage from lorry parks and/or parking areas for fifty car park spaces or more and hardstandings should be passed through an oil interceptor designed compatible with the site being drained. Roof water shall not pass through the interceptor.

Pollution Prevention:
Notwithstanding the provision of the Town and Country Planning General Permitted Development Order 1995 (or any order revoking or re-enacting that Order), any oil storage tank shall be sited on an impervious base and surrounded by oil tight bunded walls with a capacity of 110% of the storage tank, to enclose all filling, drawing and overflow pipes. The installation must comply with Control of Pollution Regulations 2001, and Control of Pollution (Oil Storage) Regulations 2001.

Site operators should ensure that there is no possibility of contaminated water entering and polluting surface or underground waters.

Yours faithfully

Mr. T.G. Waddams
Planning Liaison

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

Appendices.

Please note – Our hourly charge for pre application assessments is now £100 + VAT per hour

Environment Agency, East Anglia Area (West), Bromholme Lane, Brampton, Huntingdon, Cambs. PE28 4NE.

www.gov.uk/environment-agency

APPENDIX 1 – Advice to Applicant.
SuDS:
- Infiltration sustainable drainage systems (SuDS) such as soakaways, unsealed porous pavement systems or infiltration basins shall only be used where it can be demonstrated that they will not pose a risk to the water environment.
- Infiltration SuDS have the potential to provide a pathway for pollutants and must not be constructed in contaminated ground. They would only be acceptable if a phased site
Only clean water from roofs can be directly discharged to any soakaway or watercourse. Systems for the discharge of surface water from associated hard-standing, roads and impermeable vehicle parking areas shall incorporate appropriate pollution prevention measures and a suitable number of SuDS treatment train components appropriate to the environmental sensitivity of the receiving waters.

- The maximum acceptable depth for infiltration SuDS is 2.0 m below ground level, with a minimum of 1.2 m clearance between the base of infiltration SuDS and peak seasonal groundwater levels.
- Deep bore and other deep soakaway systems are not appropriate in areas where groundwater constitutes a significant resource (that is where aquifer yield may support or already supports abstraction).
- SuDS should be constructed in line with good practice and guidance documents which include the SuDS Manual (CIRIA C753, 2015) and the Susdrain website.
- For further information on our requirements with regard to SuDS see our Groundwater protection position statements (2017), in particular Position Statements G1 and G9 – G13 available at: https://www.gov.uk/government/publications/groundwater-protection-position-statements

APPENDIX 2 – Pollution Prevention.

- Any facilities, above ground, for the storage of oils, fuels or chemicals shall be sited on impervious bases and surrounded by impervious bund walls. The volume of the bunded compound should be at least equivalent to the capacity of the tank plus 10%. All filling points, vents, gauges and sight glasses must be located within the bund. The drainage system of the bund shall be sealed with no discharge to any watercourse, land or underground strata. Associated pipework should be located above ground and protected from accidental damage. All filling points and tank overflow pipe outlets should be detailed to discharge into the bund.
- Prior to being discharged into any watercourse, surface water sewer or soakaway system, all surface water drainage from lorry parks and/or parking areas for fifty car park spaces or more and hardstandings should be passed through an oil interceptor designed compatible with the site being drained. Roof water shall not pass through the interceptor.
- Prior to being discharged into any watercourse, surface water sewer or soakaway system, all surface water drainage from parking areas and hard standings susceptible to oil contamination shall be passed through an oil separator designed and constructed to have a capacity and details compatible with the site being drained. Roof water shall not pass through the interceptor.
- Foul and surface water manhole covers should be marked to enable easy recognition, convention is red for foul and blue for surface water. This is to enable water pollution incidents to be more readily traced.
- The Environmental Permitting Regulations make it an offence to cause or knowingly permit any discharge that will result in the input of pollutants to surface waters or groundwater.

We recommend that developers should refer to:

3. Our “Guiding Principles for Land Contamination” for the type of information that we require in order to assess risks to controlled waters from the site: http://www.claire.co.uk/useful-government-legislation-and-guidance-by-country/76-key-documents/192-guiding-principles-for-land-contamination-gplc. The Local Authority can advise on risk to other receptors, for
example human health);


End.