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**Proposal: Demolition of existing buildings and erection of a care home (Use Class C2) with external amenity space, access, parking, landscaping and other associated works**

**Former Hotel Felix Whitehouse Lane Cambridge Cambridgeshire**

**Comments from Lead Local Flood Authority (LLFA)**

Dear Madam,

Thank you for your consultation which we received on 12<sup>th</sup> April 2021.

At present we **object** to the grant of planning permission for the following reasons:

**1. Treatment of water**

The system for treating water needs to accommodate for the highway water runoff on the access road. As it currently stands there is no treatment of the highways water runoff. This is not in line with the Pollution Hazard Indices within the CIRIA SuDS Manual (C753) Chapter 26. Additional surface water treatment is required on site to ensure all surface water runoff receives adequate treatment prior to discharging offsite. This could be through the use of open attenuation or permeable surfaces such as permeable paving over the access road. Until there is suitable treatment of surface water in line with the Pollution Hazard Indices we are unable to support this.

**2. FSR vs FEH**

The submitted calculations are using FSR rainfall data. However, FSR rainfall data is now outdated and there are more accurate data sets in FEH 1999 and 2013 models. This due to recording of rainfall over a longer period of time, as well as updated calculations behind the model. Therefore, FEH rainfall data is now required on all applications to ensure the hydraulic modelling is an accurate representation of the proposed network.

**3. Permission to discharge into Anglian Water connection**

The applicant plans to discharge surface water from the site into an existing Anglian Water

surface water network. Although it is thought that the site currently drains into an existing Anglian Water sewer, no assumption should be made that this historic connection still exists and therefore the application must be assessed as if there is no existing connection. Until agreement in principle with Anglian Water has been submitted, we are unable to support this application.

#### 4. Attenuation volumes

The applicant has used a 'Quick Storage Estimate' to calculate the volume of attenuation required. This is not a suitable method for calculating the volume of attenuation for a full planning application where a greater level of detail is required.

### Informatives

#### Pollution Control

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.

#### Assistance For Developers

- Cambridgeshire County Council has a surface water guidance document which is available to [view here](#). This document provides checklists and templates to help ensure you include sufficient information within your drainage strategies. Following this guidance will help reduce the risk of an objection which can hold up a planning application.
- We also offer a [pre-application service](#) which enables you to discuss your drainage proposals with the LLFA Officers prior to submission of a formal application.

Yours faithfully,

*H Ellis*

Hilary Ellis

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

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

*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.*