Cambridge City Council, East Cambridgeshire District Council, Fenland District Council, Huntingdonshire District Council and South Cambridgeshire District Council

Cambridgeshire Flood and Water Supplementary Planning Document

Consultation Statement

1. Introduction

1.1. The Town and Country Planning (Local Planning) (England) Regulations 2012 require a local planning authority to consult the public and stakeholders before adopting a Supplementary Planning Document (SPD). Regulation 12(a) requires a statement to be prepared setting out who has been consulted while preparing the SPD; a summary of the main issues raised; and how these issues have been addressed in the SPD.

1.2. This statement sets out details of the consultation which has informed the preparation of the SPD.

1.3. The Cambridgeshire Flood and Water SPD has been prepared to provide guidance on the implementation of flood and water related planning policies contained within the draft or adopted Local Plans of Cambridge City Council, East Cambridgeshire District Council, Fenland District Council, Huntingdonshire District Council and South Cambridgeshire District Council. Such policies address matters of flood risk, including use of Sustainable Drainage Systems (SuDS), water quality and water resources.

1.4. The SPD has been prepared to provide further guidance on flood risk and water management matters to support the policies in the local plans. It will assist developers, householders and landowners in preparing planning applications for submission to the local planning authority and will also help the Councils in determining relevant planning applications.

2. Consultation Undertaken

2.1. The SPD has been prepared by the Local Planning Authorities within Cambridgeshire, Environment Agency, Anglian Water and Internal Drainage Boards. A steering group was set up with representatives from each of these organisations.

2.2. Formal public consultation on the SPD was undertaken from 4 September 2015 until 16 October 2015. The draft Flood and Water SPD and supporting documents (Equalities Impact Assessment, Strategic Environmental Assessment (SEA) Screening Statement, and Consultation Statement) were made available on each of the Councils website, and comments could be made online using Huntingdonshire District Council's consultation system (http://consult.huntingdonshire.gov.uk/portal/pp/spd/fw).

2.3. A total of 149 representations were received on the draft SPD, and the breakdown was as follows:

- 14 support
- 16 object
- 119 observations

2.4. The SPD consultation was publicised in the different Cambridgeshire local newspapers after a press release was sent out by the County Council prior the consultation. A public notice in the form of a poster was included in the Cambridge News on 4 September 2015.

3. Issues Raised During the Production Stage of the Draft SPD

3.1. Comments made by members of the Steering Group were generally supportive, with more focused comments being given on particular sections of the draft SPD.

3.2. The Internal Drainage Boards (IDBs), in particular the Middle Level Commissioners, made detailed comments in respect of Chapter 6 (Surface Water and SuDS chapter), focusing on the management of surface water into the IDBs drains.

3.3. The Environment Agency and the local planning authorities also made substantial comments regarding the challenges presented within chapter 6, but focused mainly on ensuring that Chapter 4 regarding the Sequential and Exception tests were precise, and provide the right level of guidance for both applicants and the local planning authority.

3.4. The Steering Group also made substantial changes to Chapter 7 to make it more concise.

3.5. In response to further comments by the Steering Group, it was agreed to revise the length and number of appendices forming the SPD. Some of the detail was considered irrelevant and unnecessary, and did not add to the purpose of the document.

4. Issues Raised During the Public Consultation

4.1. The following issues were raised as part of the public consultation:

- Make the document as user friendly as possible;
- Better quality document in terms of design and clarity of images and graphs;
- Acknowledgment of the differences in landscapes and typography across the county (city to fen) should be made. Often it is perceived that SuDS cannot be used in fen areas; however this is not the case and therefore a paragraph relating to this should be added;

- Clarification of the role of Internal Drainage Boards;
- Strengthen the document to ensure the maximum benefit of any SuDS schemes, for wildlife and people;
- Include a statement that acknowledges that the Water Framework Directive categorizes water bodies into natural or heavily modified/artificial, which in turn directs the appropriate course of action of ecological status or ecological potential;
- Further clarity regarding the requirement for developers to provide evidence in relation to the sequential test and this should be more explicit within the document;
- Provide more information on the likely impacts on the Historic Environment;
- Emphasis on the need to design biodiversity into the SuDS so these can function in the future to manage flood risk, and hence avoid unnecessary conflict over maintenance and the risk of disturbing protected species;
- Importance of more trees and woodlands in and around our towns and cities where they can safeguard clean water, help manage flood risk or improve biodiversity.

4.2. Annex B records all comments received during the public consultation, together with the Councils' assessment of them, and where appropriate any changes that have been made to the SPD.

5. Issues Raised After the Public Consultation by the Steering Group

5.1. Detailed discussions were undertaken with each of the IDBs after the public consultation in the process of considering the comments made, and changes have been made to the SPD to show a better understanding of the Fen areas and IDB requirements.

5.2. Managing the conflicts between what works in City and what works in the Fens.

5.3. A further change was made to the Sequential Test as set out in Chapter 4 in response to a recent appeal decision which was material to the SPD.

Annex A: List of Organisations Consulted on the Draft Flood and Water SPD

191 Parish Council across Cambridgeshire

2 The Drawing Board

A2 Dominion Housing Group

Abbey Properties (Cambs) Ltd

Abbeygate Properties

Abel Energy

Accent Nene Housing Society Limited

Acorus RPS

Addenbrookes NHS Foundation Trust

Adlington

Admiral Homespace

Aecom

AFA Associates Specialist Planning Services

Affinity Water

Age Concern Cambridgeshire

Age UK Cambridgeshire

AH Building Design

Aldwyck Housing Association

Alexanders

Alison Withers

Alium Design Ltd

Alliance Planning

Allsop

Alsop Verrill Town Planning and Development

Altodale Limited

Alun Design Consultancy

AMEC E&I UK for National Grid

Amec Plc

Andrew Firebrace Partnership

Andrew Fleet

Andrew Martin Associates

Andrew S Campbell Associates Ltd

Anfoss Ltd

Anglia Building Consultancy

Anglia Building Surveyors

Anglia Design LLP

Anglia First

Anglian (Central) Regional Flood and Coastal Committee

Anglian Home Improvements

Anglian Ruskin University

Anglian Water Services Limited

Annington Homes

Appletree Homes Ltd

Archade Architects

Architectural & Surveying Services Ltd

Architectural Design Services

Architectural Services

Architecture & Building Design

Art Architecture Ltd

Ashworth Parkes Associates

Atkins

ATP Group

Authorised Design Ltd

Axiom Housing Association

Ayres

Barford & Co

Barker Storey Matthews

Barratt Eastern Counties

Barton Wilmore Planning

Beam Estates

Beam Estates Ltd

Beacon Planning

Bedford Borough Council

Bedfordshire Pilgrims Housing Association

Bellway Homes

Ben Pulford Architect Ltd

Bendall and Sons Solicitors

Berkeley Group Holdings Plc

Bewick Homes Ltd

BGG Associates Ltd

Bidwells

Bidwells Property Consultants

Bird & Tyler

Birketts LLP

Bloombridge Development Partners

Bloor Homes

Bloor Homes South Midlands

Blue Tree Specific Skills

BMD Architects

Bond Chartered Architects

Borough Council of Kings Lynn & West Norfolk

Bovis Homes Ltd

Bramley Line Heritage Railway Trust

Braintree District Council

Brampton Bridleway Group

Brampton Little Theatre

Brampton Park Theatre Co

Brampton Youth Forum

Brand Associates

Breathe Architecture Ltd

Brian Barber Associates

British Horse Society

British Marine Federation

British Wind Energy Association

Broadview Energy Ltd

Brookgate

Brown & Co

Brown & Scarlett Architects

BRP Architects

BS Initiative

BS Services

Buckden Marina

Buckles Solicitors

Building Research Establishment

Burgess Group PLC

Caldecotte Consultants

Cam Valley Forum

Camal Architects

Cambourne Crier

Cambria Project Management Ltd

Cambridge and County Developments (formerly Cambridge Housing Society)

Cambridge Biomedical Campus

Cambridge Cleantech Limited

Cambridge Council for Voluntary Service

Cambridge Ethnic Community Forum

Cambridge Forum of Disabled People

Cambridge GET Group

Cambridge Housing Society

Cambridge Inter-Faith Group

Cambridge Past Present and Future

Cambridge Piped Services Limited

Cambridge Sub-Regional Housing Board

Cambridge University Hospitals NHS Foundation Trust

Cambridge Water

Cambridgeshire & Peterborough Association of Local Councils

Cambridgeshire & Peterborough Environmental Records Centre

Cambridgeshire & Peterborough NHS Foundation Trust

Cambridgeshire ACRE

Cambridgeshire Bat Group

Cambridgeshire Chamber of Commerce

Cambridgeshire Constabulary

Cambridgeshire Diversity and Equality Service

Cambridgeshire Ecumenical Council

Cambridgeshire Fire and Rescue

Cambridgeshire Fire & Rescue Service

Cambridgeshire Local Access Forum

Cambridgeshire Older Peoples Enterprise

Cambridgeshire Police Authority

Cambridgeshire Race Equality and Diversity Service

Cambridgeshire Travellers Initiative

Cambridgeshire Wildlife Trust

Cambs Homes Improvement Agency

Cambs LTA

Cam-Mind

Campaign for Real Ale

Campaign for Real Ale (Huntingdonshire branch)

Campaign to Protect Rural England (CPRE)

Camstead Homes

Cannon Kirk UK ltd

Cantab Design Ltd

Care Network Cambridgeshire

Carlton cum Willingham

Carter Jonas

CB Design

CE Building Designs

CeGe Design

Central Association of Agricultural Valuers

Central Beds Council

Centre for Sustainable Construction

CgMS Consulting

Chase Construction

Chancellor, Masters and Scholars of the Univ. of Cambridge

Chatteris Town Council

Cheffins

Chesterton Parish Meeting

Chorlton Planning Ltd

Churches Together

Churchgate Property

Circle Anglia Housing Trust

Circle Housing Group

Cirrus Planning & Development

City of Ely Council

City of Providence

Civic Society of St Ives

Civic Trust

Clark-Drain

Classic Design Partnership

Cluttons LLP

Cocksedge Building Contractors

CODE Development Planners Ltd

Coldham Residents Action Group

Colin Smith Planning

Colliers CRE

Commercial Estates Group

Commissions East

Common Barn [Southoe] Action Group

Concorde BGW Ltd

Connecting Cambridgeshire

Connington Parish Meeting

Connolly Homes plc

Confederation of British Industry - East of England

Conservators of the River Cam

Construct Reason Ltd

Contour Planning Services Ltd

Coppice Avenue Residents Association

Corpus Christi Group

Cotton Windfarm Action Group

Council for British Archaeology

Councillors – Cambridgeshire County Council

Councillors – Cambridge City Council

Councillors – East Cambridgeshire District Council

Councillors – Fenland District Council

Councillors – Huntingdonshire District Council

Councillors – South Cambridgeshire District Council

Country Land and Business Association

Countryside Properties (Special Projects) Ltd

Countryside Properties Plc

CPRE

CPRE Cambridgeshire

Cromwell Park Primary School

Cross Keys Homes

Croudace

Cruso & Wilkin

CS Planning Ltd

Cyclists Touring Club for Huntingdonshire

Dalkin Scotton Partnership Ltd

David Broker Design Services

David lightfoot Design

David Lock Associates (on behalf of O&H Properties)

David Russell Associates

David Shaw Planning

David Taylor Associates (UK) Ltd

David Walker Chartered Surveyors

David Wilson Homes and Kler Developments Ltd

Dawbarn and Sons Ltd

DC Blaney Associates Ltd

DCN Architectural Design Services

Dean Jay Pearce Architectural Design

Defence Estates (MoD)

Defence Estates Operations

Defence Estates Operations North

Defence Infrastructure Organisation

Defence Lands Ops North

Delamore

Denley Draughting Ltd

Denton and Caldecote Parish Meeting

Department of Environment, Food and Rural Affairs

Derbyshire Gypsy Liaison Group

Design & Planning

Design ID

Dev Plan UK

Development Land and Planning Consultants

DGA Architecture

DGM Properties Ltd

Dickens Watts and Dade

Diocese of Ely

Disability Cambridgeshire

Disability Information Service Huntingdonshire

Distinct Designs UK Ltd

DLP Consultants Ltd

DLP Planning Ltd

DPA Architects

DPDS Consulting Group

Drake Towage Ltd

DTZ

E & P Building Design

E.ON UK

Eagle Home Interiors

Earith Plant Ltd

Earith Primary School

Earith Timber Products Ltd

East Northamptonshire District Council

East of England Black and Minority Ethnic Network

East of England Strategic Health Authority

Ecoexcel Ltd

ECS Ltd

Elmside Ltd

Ely Design Group

Ely Diocese/HS&P

Ely Group of Internal Drainage Boards

Empowering Wind Group

Energiekontor UK Ltd
Engena Ltd
Engineering Support Practice Ltd
English Brothers Ltd
Entec on behalf of National Grid
Environment Agency
ESCA Eatons Community Association
Essex County Council
Estover Playing Field Association
Eversheds LLP
Evolvegroup Ltd
FACT
Fairhurst
Farcet Farms
Farcet Nurseries
Federation of Small Businesses
Fen Ditching Company
Fenland Chamber of Commerce
Fenland Citizen
Fenland Citizen Advice Bureau
Fenland Leisure Products Ltd
Fenpower/Ecogen
Fenstanton Village Hall Trust
FFT Planning
Fields In Trust
First Capital Connect
Firstplan
Fisher Parkinson Trust
Fitch Butterfield Associates
Flagship Housing Group
FOB Design
Ford and Slater
Forest Heath District Council
Forestry Commission
Foster Property Developments Ltd
Fountain Foods
Foxley Tagg Planning Ltd
Framptons
Francis Johnson & Partners
Francis Jackson Estates Ltd
Freeland Rees Roberts
Freeman Brear Architects
Freight Transport Association
Friends Families Travellers
Friends of the Earth
Friends of Hinchingbrooke Park
Friends of Holt Island Nature Reserve
Friends of Paxton Pits Nature Reserve
Friends of Priory Park
Friends of the Earth
FSB Huntingdonshire
Fuse 3
Fusion On-Line Limited
G K Partnership
G1 Architects
G.H. Taylor Design
G.R.Merchant Ltd
Gallagher Estates Ltd
Galliford Try Strategic Land
GamPlan Associates

Gary John Architects

Gatehouse Estates

Gavin Langford Architects Ltd

GC Planning Partnership

GCE Hire Fleet Ltd

Gerald Eve

Geo Networks Limited

Geoff Beel Consultancy

Geoffrey Collings and Company

George Laurel & Partners

Gillespies Ltd

GL Hearn

Gladman Developments Ltd

GML Architects Ltd

Godmanchester in Bloom

Godmanchester Rovers Youth Football Club

Godmanchester Town Council

Good-Designing Ltd

Gooding Holdings Ltd

Goose Architects Ltd

Govia plc

Govia Thameslink Railway

Graham Handley Architects

Grahame Seaton Design Ltd

Granta Housing Society

Great Ouse AONB Working Group

Great Ouse Boating Association

Great Shelford Parochial Charities

Greater Cambridge Greater Peterborough Local Enterprise Partnership

Greater Cambridgeshire Local Nature Partnership

Greater London Authority

Green Power Solutions UK Ltd

Greg Saberton Design

Gregory Gray Associates

Grosvenor USS

Gs Designs

Guinness Trust

GVA

H L Hutchinson Ltd

Haddenham BDC

Haddon Parish Meeting

Hallam Land Management

Hallmark Power Ltd

Hamerton and Steeple Gidding Parish Meeting

Hanover Housing Association

Hargrave Conservation Society

Harlequin Ltd

Harris Lamb Chartered Surveyors

Harris Partnership

Hartford Conservation Group

Hartford Marina

Hastoe Housing Association

Haysom Ward Miller Architects

Heaton Planning Ltd

Hemingford Abbots Golf Club

Henry H Bletsoe & Son

Hertfordshire County Council

Hewitsons

HFT Gough & Co

Highways England

Hill

Hill Construction

Hinchingbrooke Health Care NHS Trust

Hinchingbrooke Water Tower Ltd & Landro Ltd

Historic England

Hobson's Conduit Trust

Hodplan Ltd

Hodsons

Hollins Architects, Surveyors and Planning Consultants

Home Builders Federation

Homes & Communities Agency

Houghton and Wyton Neighbourhood Plan Working Party

Housing 21

Howard Sharp and Partners

HPN Ltd

HTA

Humberts

Hundred Houses Society

Huntingdon and Godmanchester Civic Society

Huntingdon CAB

Huntingdon Freemen's Charity

Huntingdon Mencap

Huntingdon Timber

Huntingdon Town Council

Huntingdon Youth Town Council

Hunts Cricket Board

Hunts Health - Local Commissioning Group

Hunts Forum for Voluntary Organisations

Hunts Society for the Blind

Hutchinsons

Hutchinsons Planning and Development Consultants

Hyde Housing

Ian H Bix Associates Ltd

ICE Renewables

Iceni Homes

Iceni Projects Ltd

In-site Design

Inigo Architecture

Indigo Planning Limited

Infinity Architects

Insight Town Planning

Iplan Ltd

Institute of Directors - Eastern Branch

Irish Travellers Movement in Britain

ISOFAST

Ivy House Trust

J & J Design on behalf of Chatteris Airfield

J & J Design on behalf of Defence Estates

J Brown and Sons

James Development Co Ltd

James England Ltd

James Mann Architectural Services

Januarys

Januarys Consultant Surveyors

Jehovah's Witnesses

Jephson Housing Association Group

John Martin & Associates

John Stebbing Architects

Johnson Design Practice

Joint Strategic Planning Unit

JK Architecture

John Rowan & Partners

Jones Day Solicitors

Jones Developments Ltd

JRK & Partners Ltd

JS Bloor Services Ltd

K L Elener Architectural Design

Kevin Burton MCIAT

Kier Group plc

Kier Partnership Homes Limited

Kier Residential (part of Twigden)

Kimbolton School

King Street Housing Society

Kinnaird Hill

KWA Architects Ltd

L Bevens Associates Ltd

Lafarge Aggregates & Concrete UK

Lakeside Lodge Golf Centre

Lambert Smith Hampton Property Solutions

Lancashire Industrial & Commercial Services

Landmark Landscape Planning

Landro Ltd

Landscape Institute

Langley Associates

LANPRO SERVICES

Larkfleet Homes

Laurence Gould Partnerships Limited

Leach Homes

Les Stephan Planning

Levvel

Lewis & Hickey

Lidl UK

LIghtfoot Design

Linden Homes

Linconshire County Council

Living Sport

Local Generation Ltd

Local Nature Partnership

London Gypsy and Traveller Unit

Longhurst & Havelok Homes Ltd

Longsands Academy

Loves Farm Community Association

Luminus Group

Lynwood Associates Ltd

Lyster Grillet & Harding

M R Designs

M T Consulting

Mair & Sons (Farmers) Ltd

March Chamber of Commerce

March Town Council

Marine Management Organisation

Mark Reeves Architects

Marlborough Properties UK Ltd

Marshalls of Cambridge

Mart Barrass Architect Ltd

Martineau

Matrix Planning Ltd.

Maxey Grounds & Co

Maxey Grounds LLP

Mayfair Investments

McCann Homes

Melbourn Dental Practice

Melbourn Housing Development Awareness Campaign

Melling Ridgeway & Partners

Meridian

Meridian Architectural LLP

Michael Bullivant Associates

Michael Ingham Associates

Middle Level Commissioners

Mike Hastings Building Design

Mike Sibthorp Planning

Miller Homes

Milton (Peterborough) Estates Co

Minster Housing Association

MLT Architects

Mobile Operators Association

Molesworth Action Group

Morbone Parish Meeting

Morton & Hall Consulting Ltd

Mosscliff Environmental Ltd

MP North West Cambridgeshire

MRPP

Mrs P Wilderspin

Muir Housing Group

Murray Planning Associates Ltd

N & C Glass Ltd

National Farmers Union

National Federation of Gypsy Liaison Groups

National Grid

National House Building Council

National Housing Federation

National Trust

Natural England

NDC Architects Ltd

Neale Associates

Neil Cutforth & Associates

Nene Valley Gliding Club

Nene Valley Nature Improvement Area

Network Rail

New Homes

New World Architectural

NHS Cambridgeshire and Peterborough

NHS England (Midlands & East)

NHS Property Services

NKW Design

NJL Consulting

Nobles Field Committee

Noble's Field Trust Committee

Norfolk County Council

Norfolk Street Traders

Norman Cross Action Group

North Hertfordshire District Council

North Northamptonshire Joint Planning Unit

Northamptonshire County Council

Northern Trust

Notcutts Limited

NRAP Architects

Nupremis

MWS Design

N'worth Hous.Consort

Office of Rail and Road

Oglesby & Limb Ltd

Oliver Russell Property Consultants

Omega Signs Ltd

Once Architecture Ltd

Optical Activity Ltd

Orchard Park Community Council

Ormiston Children's and Family Trust

Ove Arup & Partners

Over and Willingham Internal Drainage Board

Oxmoor in Bloom

P Grisbrook Building Design Service

Papworth Hospital NHS Foundation Trust

Papworth St Agnes Parish Meeting

Paradigm Housing Group

Parkin Planning Services

Parson Drove Amenities Group 95

Partners in Planning & Architecture Ltd

Paul & Company

Paul Mitchell & Co

Paul Owen Associates

PDE Construction Ltd

PDG Architects

Peacock & Smith

Pegasus Planning

Pegasus Planning Group

Pendimo

Persimmon Homes (East Midlands) Ltd

Peterborough City Council

Peterborough Environment City Trust

Peter Brett Associates

Peter Cutmore Architect

Peter Humphrey Associates

Peter Rawlings Architects Ltd

Peter Smith Associates

Phase 2 Planning & Development Ltd

Philip Bailey Architects Ltd

Phillips Planning Services Ltd

Pick Everard

Pidley Cum Fenton PC

Plainview Planning Ltd

Plan B Drawing Service

Planning Aid

Planning Places for People

Planning Potential

PlanSurv Ltd

Planware Ltd

PMA

Pocock & Shaw

Poors Allotments Charities

Poppyfields Investments

Powis-Hughes

Premier Choice Ltd

Prime Oak Buildings Ltd

Property Revolutions Ltd

Preserving Upwood

Project Support Services

Purcell UK

R B Organic

Quay Plumbing Centre

Railfuture East Anglia

Ramblers' Association [Cambridge Group]

Ramblers/Local Access Forum

Ramboll UK

Ramsey Club Co Ltd

Ramsey Estate

Ramsey Fourth (Middlemoor) IDB

Ramsey Million

Ramsey Town Centre Partnership

Rapleys Planning Consultants

RAVE

Raymond Stemp Associates

RB Organic

Redmayne Arnold & Harris

Redrow Homes (South Midlands) Ltd

Renewables East

RES UK and Ireland Ltd

Residential

Residential Development Land Agent Ltd

RFU

RHH Associates Ltd

Richard Brown Planning

Richard Raper Planning Ltd

Richmond Fellowship Employment and Training

Robert Doughty Consultancy

Robinson & Hall LLP

Robinson and Hall

Roddons Housing Association

Roger Driver Partnership

Roger Tym and Partners

Rose Homes Ltd

Rotary Club of Wisbech

Royal Air Force

Royal Society for the Protection of Birds (RSPB)

Roythorne and Co

RPS Planning

Rutland County Council

S B Components (International) Ltd

Sampson Associates

Santon Retail Ltd

Sanctuary Housing Association

Saunders Boston Ltd

Savills

Savills Incorporating Smiths Gore

Selling Solutions Cambridge Ltd

Scotfield Ltd

SEARCH Architects

Seagate Homes

Sentry Ltd

Sharman Architecture

SHED

Shelter

Shrimplin Brown Planning & Development

Showmen's Guild of Great Britain

Signet Design

Skanska UK Plc

Ski Property Management

Simon J Wilson Architect

Smart Planning Ltd

Smarter Planning Champion

Smith Farrer Holdings

Smiths Gore

Soham Town Council

Somersham and District Day Centre

South Cambridgeshire Youth Council

Spacelab

Sport England

Sport England (East Region)

Sports and Fashions

Solo Designs

South Holland District Council

South Kesteven District Council

Springfields Planning & Development

SSA Planning

St Edmundsbury Borough Council

St Ives Chamber of Commerce and Industry

St Ives Town Initiative

St Ives Town Team

St Ivo School

St John's College

St Neots and District Chamber of Commerce

St Neots Town Centre Manager

St Neots Town Council

St Neots Youth Town Council

Stecen Abbott Associates

Stewart Ross Associates

Stilton Community Association

Stop Molesworth Wind Farm Action Group

Strawsons Holdings Ltd

Strutt and Parker LLP

Studio 11 Architecture

Suffolk County Council

Sustrans

Swann Edwards Architects

Swavesey District Bridleways Association

Swavesey Internal Drainage Board

T A M Engineering

T C Harrison Ford

Tadlow Parish Meeting

Taylor Vinters - Solicitors

Taylor Wimpey

TCI Renewables Ltd

TCS Design

TE&AS

Technical Signs

Terence O'Rourke Ltd

Terry Stoodley Partnership

The Abbey Group Cambridgeshire Ltd

The British Wind Energy Association

The Bursars Committee

The Cambridge Conservatory Centre Ltd

The Cambridgeshire Cottage Housing Society

The Card Gallery

The Civic Society of St Ives

The Church of England Ely Diocese

The Churches Conservation Trust

The Clarke Smith Partnership

The Coal Authority

The Crown Estate

The Design Partnership (Ely) Ltd

The Ely Planning Company

The Environment Agency

The Environmental Protection Group Ltd

The Equality and Human Rights Commission

The Fairfield Partnership

The Fisher Parkinson Trust Ltd

The Foyer

The Garden Office Company

The Gypsy Council (GCECWCR)

The Inland Waterways Association

The Landmark Practice

The Landscape Partnership

The National Federation of Gypsy Liaison Groups

The National Trust (East of England Office)

The Papworth Trust

The Planning Law Practice

The Redhouse Trust

The Robert Partnership

The Showmen's Guild of Great Britain

The Solar Cloth Company Limited

The Theatres Trust

The Traveller Movement

The Varrier Jones Foundation

The Wellcome Trust

The Whitworth Co-Parrnership

The Wildlife Trust for Bedfordshire, Cambridgeshire and Northamptonshire

The Woodland Trust - Public Affairs

Thornburrow Thompson Ltd

Thurlow Nunn Standen Ltd

Tibbalds Planning and Urban Design

Tibbet Architectural Services

Tim Marshall Design

Tim Moll Architecture

Timothy Smith & Jonathan Taylor LLP

Tingdene Developments Ltd

TNEI Services Ltd

Tony Walton Design

Town Planning Services

Traer Clark Chartered Architects

Travel for Cambridgeshire

Traveller Law Reform Project

Travellers Times Online

Travis Perkins

Truckmasters Ltd

Trumpington Residents Association

Turner Contracting

Twitchett Architects

UK Power Networks

University of Cambridge Estate Management and Building Service

University of Cambridge - Vice Chancellor's Office

Urban and Civic

Uttlesford District Council

V G Energy

Various Leverington Groups

Vawser and Co

Vergettes

Verity & Beverley Ltd

Vincent and Gorbing Chartered Town Planners

Visual Creations

W A Fairhurst & Partners

Wagstaffe & Ablett

Warboys Sports Ground Trust

Ward Gethin Archer

Wardell Armstrong LLP

Warden Housing Association Ltd

Warren Boyes & Archer Solicitors

Wellsfield Associates

Wenman Design Solutions Ltd

West End Preservation Society

Westbury Garden Rooms Ltd

White and Eddy

White Young Green

Whiting & Partners

Whittlesey & District Tenants' Association

Whittlesey Town Council

Whittome Farms

Wildfowl and Wetlands Trust Centre

William H Brown

Wind Direct

Wind Energy Direct Ltd

Wind Prospect Developments

Windcrop Ltd

WindEco Ltd

Winwick Parish Meeting

WisARD

Wisbech and District Chamber of Commerce

Wisbech Chamber of Commerce

Wisbech Electrical

Wisbech Roadways

Wisbech Round Table

Wisbech Town Council

Wm Morrison Supermarkets plc

Wood Hardwick Ltd

Woodard Builders & Developers

Woodland Trust

Woods Hardwick Planning Ltd

Woolley Hill Action Group

Workshop 76 Ltd

Wynnstay Properties

WYG

Wythe Holland Partnership LLP

XCelld Ltd- Renewable Energy

Yaxley Ammenity Centre

York Green Renewables

Annex B: Record of Issues Raised and Action Taken

Consultee Name	Chapter or Para No.	Comment ID	Support/ Observations / Object	Comment	Councils' assessment	Action
Overall Document						
Dr Roger Sewell	Overall doc	F+W SPD:3	Support	I thought this was a good and carefully written document which I support.	Support noted	No change
Mrs Hattie Emerson	Overall doc	F+W SPD:7	Support	I stongly agree that SuDs should be conisdered by developers and adopted where appropriate for flood attenuation. This should also be rigorously enforced	Support noted	No change
Mr Brian Williams	Overall doc	F+W SPD:8	Have observations	I have an issue I would like to be considered. Around the junction of Bannold rd and Bannold Drove Waterbeach near Mid Load Farm 2/3 times per year after heavy rains we experience effluent backing up the sewer drain into the gardens and surrounding a dozen or so properties. We are concerned that Aglian Water and the Planning Authority do not take any account of the invasion of surface water into the sewer when they calculate the capacity of the sewer. Our great concern is that around 300 houses are to be built in the area and Aglian Water will respond to the question of capacity solely on the estimate of foul water entering the drain despite their knowledge of the sewer being overwhelmed by surface water on a regular basis. I would like the document to reflect the fact of non sustainability and be rectified by increasing capacity or restricting surface water from the foul drain before any additional housing is connected.	This is acknowledged; however the issue is out of the scope of the SPD	No change

Annex B: Record of Issues Raised and Action Taken

Consultee Name	Chapter or Para No.	Comment ID	Support/ Observations / Object	Comment	Councils' assessment	Action
Parish Clerk Burwell Parish Council	Overall doc	F+W SPD:17	Have observations	Burwell Parish Council is concerned that with lack of maintenance and dredging of the Burwell Lode, that flood issues could arise in Burwell in furture years	This is acknowledged; however the issue is out of the scope of the SPD	No change
Mr Michael Wollaston	Overall doc	F+W SPD:18	Have observations	The Suds in principal can only work when all other contributing factors are considered . The example I will give is land to the north of Whittlesey . This area of land is adjacent to a functional floodplain . Flood zone 3(b) , Whittlesey washes . Despite not being an area of land identified in the local plan , two sites still managed to get approval via the windfall loop hole which is being exploited by developers . The areas that have been earmarked for developement need to have robust drainage systems incorporated to mitigate against flood lock , which can last for weeks and sometimes months . overland flow routes for surface water , to and from existing dwellings and infra structure should be included In all sud designs and include capture and hence additional capacity . Sud viability should take into consideration existing soil structure pre -development . placing suds on secondary aquifers with fluctuating water bodies dependant on rainfall inundation , has the potential to increase flood risk elsewhere , putting suds on Mudstone overlaine by March gravels at various levels needs careful consideration in the design process as this has the potential	This is acknowledged; however the issue is out of the scope of the SPD. It should be noted that the consideration of site conditions and SuDS suitability is covered in Section 6.2 of this SPD.	No change

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				to create spring points . This would go against the NPPF and NPG for flood risk For both pluvial and fluvial flooding . In summary Developing land on and adjacent to the north of Whittlesey adjacent to Whittlesey washes is not a viable option , due to the lifetime sustainability of the Suds which Cannot be guaranteed .Both existing and new residents need to be safeguarded from flooding from ALL SOURCES.		
Mr Andy Brand The Abbey Group (Cambridgeshire) Ltd	Overall doc	F+W SPD:28	Have observations	The images used within the document are not clear and often distorted.	This is agreed and relates to the space available on the host website for the draft SPD. Full resolution images are to be used for final document.	Full resolution images/plans added to final SPD
Mr Richard Whelan	Overall doc	F+W SPD:39	Have observations	The document does not seem to be conducive to encouraging developers compliance with changes in recent legislation, it seems rather cumbersome in places and would be quite an animal to tackle for anyone who may have to deal with more than one authority. Document appears to focus on the requirements of the MLC more than those of all water level management bodies/ Internal Drainage Boards. Would definitely support a document that can be adopted across the whole of the county area and have buy in of all planning authorities Some of the document appears to be rather	Several comments relating to cumbersome nature of document have been received as part of consultation; however content and length were agreed by the steering group prior to publication of the draft. Chapter 4 which received most comments needs to be rearranged to enhance readability. It is a fair comment that Middle Level Commissioners (MLC) have far more IDB specific information contained within the SPD than other IDBs and much of it is indeed relevant to all IDBs. References to MLC requirements that also relate to other IDBs should be replaced with	Chapter 4 rearranged to make it more reader friendly. Agreed by steering group Step 4 of Section 4.3 reworded from '*meets the criteria of the Middle Level Commissioners'* to '*may have an impact on an IDBs system'.* Document amended so titles are on new pages and boxes/tables amended to fit on one page wherever possible

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				wordy and overly complicated, would be concerned over how easy it would be to navigate and pick out the areas that are needed, for example chapter 4 could be easier to follow and the wording for step 6 (a) on page 31 Make it more visually appealing to have titles starting new pages and boxes on one page where possible, e.g 4.6 and the blue box for step 4 spans two pages	general IDB requirements. As MLC is also a navigation authority, some references that single out MLC have to remain as they are slightly different to other IDBs in this respect. Acknowledged that some tables and their associated text have split between pages; this should amended for final draft	
Mr George Dann King's Lynn Drainage Board	Overall doc	F+W SPD:112	Have observations	While generally a good document, and certainly a significant step in the right direction, along with various spelling and grammar issues at points throughout the document, I'd wish to note a few other issues which I feel merit amendment prior to publication of the final version. Section numbers refer to those in your draft SPD.	Acknowledged and a full spelling/grammar check should be undertaken prior to publication of final version	Spelling/grammar check undertaken
Allan Simpson Anglian Water Services Ltd	Overall doc	F+W SPD:126	Support	<u>Para 3.2.20</u> The final sentence of this paragraph states that it is responsibility of applicants to consult relevant WMAs. It is unclear what is intended as the Local Planning Authority (LPA) is responsible for consulting statutory and non-statutory consultees as part of the planning application process. Applicants should be encourage to consult relevant bodies including Anglian Water as part of the pre-application process. It would also be helpful if it was made clear that LPAs are required	Acknowledged – this should be made clearer in the final document. As part of the planning consultation process it is the responsibility of the LPAs to consult statutory consultees and not the applicant. Pre-application discussions are however always encouraged.	Amend paragraph 3.2.20 to, '*The LPA will consult the relevant statutory consultees as part of the planning application assessment and they may, in some cases also contact non-statutory consultees (e.g. Anglian Water or IDBs) that have an interest in the planning application'* Due to other alterations throughout the document this is now paragraph 3.2.22

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				to consult statutory consultees as but they also consult relevant bodies including Anglian Water who have interest in a planning application and managing flood risk.		
Scott Hardy RSPB	Overall doc	F+W SPD:134	Have observations	Thank you for providing the RSPB with the opportunity to comment on the above consultation. The RSPB is supportive of the overall objective of the Cambridgeshire Flood and Water Supplementary Planning Document (SPD) and its role in supporting sustainable policies for managing increased flood risk in Cambridgeshire. However, there are areas that we consider the document should be strengthened to ensure the maximum benefit of any SuDS schemes, for wildlife and people, will be delivered. Our recommendations are detailed below. 1. RSPB concerns regarding Cambridgeshire watercourses The RSPB has serious concerns about the current impact of flooding and poor water management on wildlife within Cambridgeshire. For example, the Ouse Washes since the 1970s has seen increased incidence and severity of late spring/summer flooding, longer deeper winter flooding, and poor water quality resulting in demonstrable ecological deterioration. Our key interest in the Flood and Water SPD relates to its role in ensuring new developments do not pose a risk to protected sites designated for their national and international importance for	Support acknowledged.	Added additional section titled '*Design for Wildlife and Biodiversity'* (6.3.30 – 6.3.32). *6.3.30 SuDS can provide the ideal opportunity to bring urban wetlands and other wildlife-friendly green spaces into towns and cities. They can be linked with existing habitats to create blue and green corridors whilst providing an amenity and education resource for the community.* *6.3.31 Where possible, existing habitats should be retained and incorporated into the landscape design. SuDS features are likely to have greater species diversity if existing habitats are within dispersal distance for plants, invertebrates and amphibians. It should however be noted that existing wetlands should not be incorporated into SuDS unless there is a guaranteed supply of clean water.* *6.3.32 An aim should be to create new habitats based on the ecological context and conditions of the site. Habitats and species objectives that contribute to local, regional and national biodiversity targets should be prioritised. Further information on local objectives can be found in local (BAPs). Guidance on maximising the biodiversity potential of SuDS can be found in the Royal Society for the Protection of Birds (RSPB) publication - Maximising the Potential for People and Wildlife*

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				nature conservation, and that they maximise the opportunities for wildlife and people through sustainable water management. Strong policy and guidance is required to ensure that new development does not negatively impact on already strained systems, and wherever possible helps contribute to improving upstream storage. 2. RSPB position on Sustainable Drainage Systems (SuDS) Many existing drainage systems cause problems of flooding and/or pollution. Traditionally, underground pipe systems drain surface water and prevent flooding locally by quickly conveying away water. Such alterations to natural flow patterns can lead to flooding downstream and reduced water quality. The impact of climate change could see even greater pressure placed upon our drainage systems. SuDS provide a solution to mitigate and manage this challenge. They can provide cost effective and resilient drainage without causing the problems associated with traditional piped drainage. They also provide the ideal opportunity to bring urban wetlands and other wildlife-friendly green spaces into our towns and cities and link these with existing habitats creating blue and green corridors. Well-designed SuDS should also be an amenity and education resource for the community, providing high-quality public green space in which to relax, play and enjoy wildlife. If designed innovatively and correctly they can provide the community		

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				with a healthy and aesthetic environment, which they feel proud to live in and the wildlife will colonise naturally. 3. Opportunities to improve SuDS guidance within SPD Having reviewed the Cambridgeshire Flood and Water SPD we are pleased to see it provides sound guidance on selecting appropriate sites through Flood Risk Assessment, and the incorporation of Sustainable Urban Drainage Systems (SuDS) into development proposals. However, the RSPB strongly recommends that the following points be taken in to account in order to strengthen and improve the guidance. The RSPB supports the development of the SPD as a useful tool for Local Planning Authorities (LPAs) to engage with developers about flood and water management from the earliest proposal stage. However, the document should be strengthened to ensure that the maximum benefits of SuDS scheme are delivered. Given concerns regarding increased flooding and water quality issues in Cambridgeshire currently, and the potential increased pressures from climate change, the RSPB recommends the SPD be used as a catalyst to adopt stronger flood and water management requirements within future LPA Local Plans within Cambridgeshire's		
Mr Graham Moore	Overall	F+W	Have	The Commissioners and associated Boards are pleased to have been invited to assist in	Comment acknowledged – it is appreciated that there are differing	Paragraph 3.2.7 reworded to, '*IDBs are local public authorities that manage water levels.*

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Middle Level Commissioners	doc	SPD:140	observations	the preparation of this document which has involved considerable discussion being undertaken with yourselves and other stakeholders. While it is acknowledged that the SPD is written by the County Council as LLFA and is intended to cover the whole County it needs to be appreciated that this involves a number of differing risk management authorities and water level/flood risk management scenarios. Both the NPPF and PPS/G25, together with the associated guidance, are generic documents and do not appreciate the special circumstances of water level/flood risk management within The Fens. Therefore, it is considered that further guidance is required to assist all parties involved within the planning process of the specific issues that are different to other parts of the Country, and must be considered. However, in order to be fully utilised the approved document needs to provide better, succinct and detailed guidance to aid Council Officers, developers, agents and other parties involved in the wider development management decision making process. It is considered that the current document is "wordy" and is likely to become ineffective. A set of guidance notes for the target audience could assist and provide a more effective "journey" for users of the document. Whilst it is accepted that there is a production cost, the notes could speed up the planning process, reduce wasted time by all parties, including the Commissioners, in	landscapes across Cambridgeshire and these should be fully acknowledged in the SPD. Some of the policy documents including PPS/G25 are now superseded. Comment on length of document acknowledged; however this was agreed by the steering group prior to the draft being published. Each LPA or the LLFA may wish to provide a supporting note for the SPD; however this isn't directly related to publication of the final SPD. Descriptions of each water management authority are provided throughout the document; however it is acknowledged that additional information regarding the role of IDBs could be included.	*They are an integral part of managing flood risk and land drainage within areas of special drainage need in England and Wales. IDBs have permissive powers to undertake work to provide water level management within their Internal Drainage District. They undertake works to reduce flood risk to people and property and manage water levels for local needs. Much of their work involves the maintenance of rivers, drainage channels, outfalls and pumping stations, facilitating drainage of new developments and advising on planning applications. They also have statutory duties with regard to the environment and recreation when exercising their permissive powers'* Due to other changes this is now paragraph 3.2.6. New paragraph (3.2.7) added in, *'IDBs input into the planning system by facilitating the drainage of new and existing developments within their districts and advising on planning applications; however they are not a statutory consultee to the planning process'* New paragraph (3.2.9) added in, '*Some IDBs also have other duties, powers and responsibilities under specific legislation. For example the Middle Level Commissioners (MLC) is also a navigation authority. Although technically the MLC are not an IDB, for ease of reference within this document it has been agreed that the term IDB can be used broadly to refer to all*

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				responding to basic and fundamental queries and thus reduce costs in the long term.		*relevant IDBs under its jurisdiction. A list of the IDBs can be found in Appendix 3'*
				The document fails to readily identify the difference between the Environment Agency and the IDBs and our differing concerns and requirements and even differences between individual IDBs. The overriding impression given is one where the role, function and governance of the IDBs appears not to be clearly understood. IDBs are set up because their area/District is at flood risk and therefore requires special local measures to be undertaken and maintained to reduce/alleviate that flood risk. The IDBs have therefore, been established with that purpose and have already established policies and governance indicating how their statutory functions will be undertaken. They already, through their local nature and funding arrangements, have very close connections and liaison with their communities and their members are, or represent, those who are required to fund their operations. They, therefore, as a matter of routine, will address the need for capital and maintenance works to be undertaken. They are therefore well versed in the needs of their Districts and answerable to their rate/special levy payers if the reasonable needs or expectations of such payers are		Paragraph 3.2.2 already encourages applicants to seek pre-application advice therefore no further action on this is required.

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				not met. The IDBs may therefore not be able to accept principles and policies which accommodate a County wide "broad brush'' basis but which are not consistent with the more detailed requirements of their local areas. In the flood risk areas managed by IDBs, development proposals are too often granted subject to conditions to allow LPAs to reach their targets, without sufficient regard to IDB comments on flood risk. It should also be appreciated that while LPAs receive fees for dealing with planning applications, IDBs do not, unless the developer chooses to follow an IDB pre-application procedure. Too often our advice is ignored and we are expected to provide a subsidised service for planning authorities to enable them to meet their targets, which the Boards are not prepared to do. Therefore, we wish to encourage LPAs to, in turn, encourage developers to adopt this procedure. In the absence of the developer doing so, we can give no guarantee that, under the present arrangements, we will be able to respond to the Council's request for advice on flood risk.		
Janet Nuttall Natural England	Overall doc	F+W SPD:151	Support	Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable	Support acknowledged.	No change

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				development. We note the aim of the SPD is to provide guidance to applicants on managing flood risk through development. We support guidance to ensure that drainage schemes will protect and enhance the natural environment where possible, including contribution to local Biodiversity Action Plan targets and the objectives of the Cambridgeshire Green Infrastructure Strategy. We particularly welcome the promotion of multi-functional SUDS, taking a landscape-led approach to provide biodiversity, landscape and green infrastructure enhancements. We agree that drainage should mimic the natural drainage systems and processes as far as possible and that SUDS can be designed to provide valuable amenity and ecological features. We believe developers should be encouraged to maximise biodiversity benefits through SUDS wherever possible. Natural England is fully supportive of the requirement for a drainage strategy to accompany planning applications and for consideration of long-term management of SUDS; this will be critical to the maintenance of long-term benefits for the natural environment. We support recognition of Natural England's Impact Risk Zones to help developers and LPAs identify potential implications for designated sites and the need for consultation. Consideration of the effects of development on the quality of the water environment, and implications for water-		

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				dependent sites and compliance with the requirements of the Water Framework Directive (WFD) is also welcomed. Natural England has advised through previous correspondence that it is generally satisfied with the conclusions of the Habitats Regulations Assessment that the SPD is unlikely to have a significant effect on European sites.		
Adam Ireland Environment Agency	Note to the reader	F+W SPD:71	Support	The Environment Agency welcomes the SPD and subsequent consultation. We support the SPD in a county which, from a national perspective, has high growth pressures coupled with widespread areas at risk of flooding. The SPD is a necessary means of guiding developers, infrastructure providers and decision makers with a clear illustration of how 'high level' local plan policy is translated and adopted in Cambridgeshire's unique catchments. **Summary** Overall we commend this is a helpful and progressive Flood Risk Guidance Document. We believe that it chimes with NPPF and accompanying practice guide, adding both detail and process guidance where the NPPF policies [and Practice Guidance] are succinct or do not provide contextual focus for a generally low lying terrain and fenland catchment. We are of the view that the SPD is consistent with and compliments the adopted Development Plan Documents for	Support acknowledged. Chapter 4 which received most comments needs to be rearranged to enhance readability. Some sections include detail from other policy/guidance documents and this was agreed with the steering group as it provides users of the document with easy reference guidance to support the content of the SPD.	Layout of Chapter 4 revised for improved readability

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				Huntingdonshire, East Cambridgeshire, Fenland and South Cambridgeshire. We also believe it to be consistent with the flood risk policy in the Cambridge City Local Plan and South Cambridgeshire Local Plan currently in examination. We consider that the SPD is a necessary means of ensuring that the flood risk policies in these higher tier plans can be implemented effectively and efficiently. We suggest some minor changes for accuracy, completeness and by way of update, particularly in respect of chapters 4, 5 and 7 where we did not have resources for detailed 'editing level' comments during formative draft stages. In Chapter 4 the headings hierarchy may need some re-planning to read the structure more clearly and see where the Stages fit into the Steps and where the sequential test and exception test fit into that. We make some recommendations. There may be further scope not to repeat verbatim other documents (flood resistance and SuDS sections). Perhaps use links if base documents have a stable web location. There are some sections that can be reworded to ensure a wider audience can understand them. We make some		

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				suggestions. Similarly, some sections needing more clarity in definition i.e. risk, residual risk, breach mechanisms, 'safe' access, and flood probability. We suggest text.		
Adam Ireland Environment Agency	1.1 Backgro und	F+W SPD:72	Have observations	1.1.5. – It would be illustrative to add current growth figures/ranges from the local plans if known. 1.1.5 - minor phrasing changes needed i.e. the 'impacts' of climate change. 1.2.3 – is there a place that acts as a road map to other documents on these issues?	These figures are already contained within the Local Plans and there would be a direct repeat of information. Additionally, some LPAs have not yet finalised their local plans. Throughout the SPD, hyperlinks to other documents are used and the number of these hyperlinks may be increased as part of the final document.	Paragraph 1.1.5 amended to read, *'A significant amount of new development will occur in Cambridgeshire in the next 20 years and beyond. In order to reduce the impact upon the water environment, development must be appropriately located, well designed, managed and take account of the impacts of climate change.* Due to other changes this is now paragraph 1.2.2 Hyperlinks to external documents included throughout SPD
Mr George Dann King's Lynn Drainage Board	2 Setting the scene	F+W SPD:114	Have observations	In section 2 "Setting the scene", I feel mention should be made of Eric Pickles's Ministerial Statement of 18 December 2014 regarding the use of SuDS within major developments.	Acknowledged and agreed – this should be added	New paragraph added in (2.3.7) titled '*Sustainable Drainage Systems: Written Ministerial Statement'.* *'On 18 December 2014, a Ministerial Statement was made by the Secretary of State for Communities and Local Government (Mr Eric Pickles). The statement has placed an expectation on local planning policies and decisions on planning applications relating to major development to ensure that SuDS are put in place for the management of run-off, unless demonstrated to be inappropriate. The statement made reference to revised planning guidance to support local authorities in implementing the changes and*

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						on 23 March 2015, the Department for Environment, Food and Rural Affairs (Defra) published the 'Non-Statutory Technical Standards for Sustainable Drainage Systems'. Further detail on how SuDS can be delivered in the Cambridgeshire context can be found in Chapter 6'
Mr John Oldfield Bedford Group of IDBs	2.2.1	F+W SPD:52	Have observations	This section should include a statement that acknowledges that WFD categorizes waterbodies into natural or heavily modified/artificial, which in turn directs the appropriate course of action of ecological status or ecological potential. This is of fundemental importance in Cambridgeshire given its waterbody systems that are heavily modifed and artifical in nature.	It is acknowledged that many watercourses throughout Cambridgeshire are artificial or heavily modified in nature' and this has a direct impact on WFD requirements. This should therefore be highlighted within the SPD. The WFD however has many requirements and if the HMWB etc. are discussed here in a lot of detail other elements of the WFD will need to be too and this section will become much larger than the other policy sections.	Added in new paragraph (2.2.2), '*To achieve the purpose of the WFD of protecting all water bodies, environmental objectives have been set. These are reported for each water body in the River Basin Management Plan. Progress towards delivery of the objectives is reported on by the relevant authorities at the end of each six-year river basin planning cycle. Objectives vary according to the type of water body; across Cambridgeshire and the Fens there is a significant network of heavily modified and artificial watercourses'* The following 2 paragraphs (7.1.3 and 7.1.4) have been added to Chapter 7, *7.1.3 In order to be able to calculate a baseline and monitor changes in ecological status/potential water bodies have been classified by their biology, their chemistry and their physical characteristics such as shape, depth, width and flow. The highest status that can be achieved, "high" is defined as the conditions associated with no or very low human pressure on the water body.* *7.1.4 It is, however, recognised in the WFD that physical alterations have taken place historically to support the socio-economic use of a water body for a particular purpose*

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						(e.g. water storage, flood defence or navigation). In this case the water body may be designated as a Heavily Modified Water Body (HMWB). Artificial Water Bodies (AWBs) are also identified in the WFD as those water bodies that have been constructed for a specific use. HMWBs and AWBs are subject to alternative environmental objectives and hence they have been clearly identified in each river basin district. This is of fundamental importance across Cambridgeshire given that many of its water body systems are heavily modified and artificial'
Mr John Oldfield Bedford Group of IDBs	2.3.1	F+W SPD:51	Have observations	It should be noted that LLFA only have responsibility for Ordinary Watercourses outside an IDB Drainage District, which isn't clear from the text.	Acknowledged – greater distinction should be made in final version	Added footnote to read, '*IDBs manage ordinary watercourses within their districts'*.
Allan Simpson Anglian Water Services Ltd	2.3.4	F+W SPD:127	Have observations	Para 3.2.4 This paragraph states that applicants for sites which require masterplans should consult relevant WMAs ***prior***to the pre-application stage. Large developments sites should use the Anglian Water pre-planning service, available on our website - http://www.anglianwater.co.uk/developers/pre-planning-service-.aspx	Due to the large number of water management authorities and local planning authorities referenced within the document it would be in appropriate to provide direct links to each of their websites throughout the text. It is however acknowledged that it could be made clearer that a pre-application service is offered by most WMAs	Column 2 refers to 2.3.4 but comment relates to 3.2.4. Action relates to 3.2.4 rather than 2.3.4. Paragraph 3.2.1 amended to, '*Many of Cambridgeshire's LPAs and WMAs provide a pre-application advice service. There may be a charge for this service. Further advice can be found on each LPAs or WMAs website'.* Paragraph 3.2.4 removed as this would still be considered 'pre-app' and is therefore covered in preceding paragraph.
Mr Graham Moore	2.3.4	F+W	Have	It should be noted that the Commissioners and associated Boards do not support the following aspects of the SPD. Our position is	(i) Changes to national legislation are beyond the control of the	No change

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Middle Level Commissioners		SPD:143	observations	as follows: (i) The Government has published the NPPF which condenses the contents of all of the former PPS documents into a general framework document which, it is proposed, will simplify the planning process. The areas of the Middle Level Commissioners and our associated/administered IDBs are a defended flood plain in which detailed day to day management of water levels is required to reduce flood risk. This must clearly influence the consideration given to development proposals and their effects. Given therefore the importance and sensitivity of water level/flood risk management within The Fens, the Commissioners and associated/administered Boards consider the NPPF to be a significantly retrograde step that will increase the risk of flooding in their area by appearing to dilute a proper consideration of the flood risk both to and caused by development in this area. In consequence, therefore, when dealing with issues related to our byelaws and consent procedures the Commissioners and associated/administered Boards will promote and require continued adoption of and compliance with the relevant principles contained within PPS25 and the associated Practice Guide together with the provision of a FRA that meets their own requirements ie detailed assessments on the impacts on the respective water level/flood risk management systems and the provision of adequate evidence to prove that a viable	LLFA and District Councils. It is the choice of the MLC if they request a FRA to be submitted meeting their own criteria (ii) Due to national policy it is a requirement that developers must demonstrate the use of SuDS across a site and if not there must be clearly demonstrable reasons why this is the case. It is also the case that the rate and volume of surface water leaving a site must not be any greater than existing; therefore it is unlikely that direct, unattenuated discharge will be acceptable to the LLFA or LPA	

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				scheme for appropriate water level/flood risk management exists, and that it could be constructed and maintained for the lifetime of the development. We will also be urging the LPAs within our areas to adopt a similar approach to ensure that proper consideration is given to flood risk issues arising from development until a suitable detailed replacement is in force. (ii) Whilst the emphasis placed on SuDS is noted, and the Commissioners and associated Boards appreciate that the use of SuDS does have a place within water level/flood risk management, particularly the discharge into managed watercourses, but it is considered that, despite the significant emphasis placed on such facilities, the use of attenuation devices in this area is not always the correct or most appropriate solution. Therefore, care needs to be taken to ensure that resources and funds are not wasted by seeking to impose attenuation solutions when a direct discharge is acceptable to the local drainage authorities.		
Mr George Dann King's Lynn Drainage Board	2.3.5	F+W SPD:115	Have observations	2.3.5 - the aim is not only to ensure that flood risk is not increased, but that it's reduced if possible.	Comment acknowledged and this should be incorporated into the final document	Amended paragraph to read '*The NPPF states that both Local Plans and planning application decisions should ensure that flood risk is not increased and where possible is reduced. Development should only be considered appropriate in flood risk areas where it can be demonstrated that'* • *A site specific flood risk assessment has been undertaken which follows the Sequential Test, and if required,*

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						the Exception Test; • *Within the site, the most vulnerable uses are located in areas of lowest flood risk unless there are overriding reasons to prefer a different location;* • *Development is appropriately flood resilient and resistant, including safe access and escape routes where required (Please see the Defra/EA publication 'Flood Risks to People' for further information on what is considered 'safe');* • *That any residual risk can be safely managed, including by emergency planning; and* • *The site gives priority to the use of SuDS.*
Adam Ireland Environment Agency	2.4 Local context	F+W SPD:73	Have observations	2.4 - should be referencing the Flood Risk Management Plan as well as/rather than the CFMP. Great Ouse FRMP is now out of consultation and due for adoption December 2015.	Comment acknowledged and this should be incorporated into the final document	Added section (2 paragraphs – 2.4.3 and 2.4.4) titled, '*River Basin Management Plans'* and the following text. '*2.4.3 In addition, the EA have developed an Anglian District River Basin Management Plan (ARBMP) this document identifies the state of, and pressures on, the water environment. This document implements the Water Framework Directive in the region and supports Defra's Catchment Based Approach.* *2.4.4 The CFMPs, FRMPs and the RBMPs together, highlight the direction of considerable investment in Cambridgeshire and how to deliver significant benefits to society and the environment'*

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Adam Ireland Environment Agency	2.4.6	F+W SPD:74	Have observations	2.4.6 – should this section also include a paragraph on where the watercourse discharge to when leaving Cambridgeshire. It needs to be acknowledged that any FRM work carried out will have an impact on other LPAs/LLFAs. Suggest: "From Cambridgeshire the watercourses flow down to the Ouse Washes and eventually discharge to the sea via the North Norfolk coast line. Changes in flood regimes in Cambridgeshire can therefore have consequences downstream within the Ouse Washes catchment beyond Cambridgeshire."	Acknowledged and this should be incorporated into the final document. Suggested wording to be added to SPD	Added following text to end of 2.4.6, '*From Cambridgeshire the watercourses eventually flow to the River Nene and River Great Ouse and subsequently discharge to The Wash and the North Sea. Changes in flood regimes in Cambridgeshire can therefore have consequences downstream within the Nene and Ouse Washes catchment, beyond Cambridgeshire'* Due to other changes this is now 2.4.9
Mr George Dann King's Lynn Drainage Board	3.1.2	F+W SPD:116	Have observations	3.1.2 - the second half of this section includes a lot of duplication of content.	Acknowledged – Multiple references made to table 3.2 This should be amended for better readability.	Paragraph 3.1.2 amended to read, '*The National Planning Practice Guidance (NPPG) lists the statutory consultees to the planning process. Within Cambridgeshire, although the local water and sewerage companies (Anglian Water and Cambridge Water) and the IDBs are not statutory consultees, they are consulted by the LPAs as part of the planning application process. Table 3.1 lists all the key WMAs across Cambridgeshire (some of which are statutory consultees) and it is important that those proposing new developments actively engage with the relevant WMAs at the earliest possible stage'*
Allan Simpson Anglian Water Services Ltd	3.2 Pre-application advice	F+W SPD:130	Have observations	<u>Para 3.2.13</u> Reference is made to Anglian Water assessing the capacity of the public system to accept flows when an application is	Acknowledged and this should be incorporated into the final document. Suggested wording to be added to SPD	Paragraph 3.2.13 amended to '*Anglian Water is also the sewerage undertaker for the whole of Cambridgeshire and has the responsibility to maintain foul, surface and*

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				received for a sewer connection (section 106 of the Water Industry Act 1991). However, applications for sewer connections are made to Anglian Water once a site has the benefit of planning permission and the details of the site have been approved. Anglian Water assesses the capacity of public sewers as part of our pre-application service and when responding to planning application consultations from Local Planning Authorities. Anglian Water is normally referred to as sewerage undertaker. It is therefore proposed that paragraph 3.2.13 should be amended as follows: 'Anglian Water is also the sewer **age** undertaker….. Anglian Water needs to ensure that the public system has the capacity to accept these flows ~~. This is assessed when an applicant applies for a sewer connection~~ **as part of the pre-application service provided by Anglian Water** . Information about Anglian Water's development service is available on their website. **Anglian Water also comments on the available capacity of foul and surface water sewers as part of the planning application process'** It is also important to note that our response to the planning application will be based on the details completed in the application form and supporting details. We will not assess capacity if the proposed method of drainage does not interact with an Anglian Water		*combined public sewers so that it can effectively drain the area. When flows (foul or surface water) are proposed to enter public sewers, Anglian Water will assess whether the public system has the capacity to accept these flows as part of their pre-application service. If there is not available capacity, they will provide a solution that identifies the necessary mitigation. Information about Anglian Water's development service is available on their website. Anglian Water also comments on the available capacity of foul and surface water sewers as part of the planning application process'.* Due to other changes this is now paragraph 3.2.14.

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Consultee Name	Chapter or Para No.	Comment ID	Support/ Observations / Object	Comment	Councils' assessment	Action
				operated system.		
Mr Andy Brand The Abbey Group (Cambridgeshire) Ltd	3.2.6	F+W SPD:19	Have observations	It is imperative that all IDB's are involved within and buy-in to this document. It appears that some discussion has taken place with MLC. Without IDB buy-in the document will be less effective and result in continued tensions.	Comment acknowledged. Other IDBs have also bene consulted on the document	No change
Mr John Oldfield Bedford Group of IDBs	3.2.7	F+W SPD:53	Have observations	It would be worth referencing other roles undertaken by IDBs for clarity, such as Consenting on Ordinary Watercourses in Drainage Districts and IDB Byelaws that protect the watercourse corridor.	Comment acknowledged	Changes made as part of comment F+W SPD:140 cover this comment so no additional changes made
Mr John Oldfield Bedford Group of IDBs	3.2.9	F+W SPD:54	Object	IDBs have the same powers and duties for the benefit of their Drainage District that is governed by the Land Drainage Act and Byelaws, and not dictated by drainage rates. It is correct that there may be different rates in different districts. I'd support the 2nd sentenace, that advises interested parties to contact an IDB if development/works are to be undertaken in or adjacent to an IDB Drainage District	Comment acknowledged	Paragraph 3.2.9 amended to read, '*IDBs may have rateable and non-rateable areas within their catchments. It is recommended that applicants contact the relevant IDB to clarify which area proposed development falls into, and if there is an associated charge'.* Due to other changes this is now paragraph 3.2.10
Mr George Dann King's Lynn Drainage Board	3.2.10	F+W SPD:113	Have observations	Although King's Lynn IDB only covers a small part of Cambridgeshire, I would primarily note my extreme dissapointment that we are not mentioned anywhere within de document, despite other IDBs appearing many times, and the fact the Board was only informed of this draft publication by a consultant who had received your email. In particular, this Board should be listed in sections 3.2.10, table 3.2 (with ticks against	Comment acknowledged and it needs to be ensured that appropriate reference is made to Kings Lynn IDB throughout the document. Maps will also need to be updated to include boundaries of the IDBs within Cambridgeshire	Paragraph 3.2.10 amended to add in Kings Lynn IDB. '*There are 53 IDBs within Cambridgeshire. Map 3.1 highlights the area of Cambridgeshire that is covered by IDBs. Some of the IDBs are represented or managed by Haddenham Level Drainage Commissioners, Whittlesey Consortium of IDBs, North Level District IDB, Ely Group of IDBs, Bedford Group of IDBs, Kings Lynn IDB and MLC. The names of the IDB groups*

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				CCC and FDC) Appendix 2 and map 2.2.		*covering each district are stated in Appendix 3*. Due to other changes this is now paragraph 3.2.11
Mr Richard Whelan	Map 3.1: IDBs within Cambridgeshire	F+W SPD:36	Have observations	Map 3.1 IDBs within Cambridgeshire; is not the clearest map; a few of the town names are chopped; an alternate road map or some editing of map may make this clearer	Comment acknowledged. Clearer maps need to be provided in final document. Due to space allocated when uploading the draft document there was a restriction on the size of images that could be used.	Map 3.1 updated
Mr Graham Moore Middle Level Commissioners	Map 3.1: IDBs within Cambridgeshire	F+W SPD:141	Have observations	Whilst many of the issues previously raised by us during the preparation of the document have been included many important items appear to have been ignored and/or have not been included. There are also many items which are incorrect or contain errors, for example, Fig 3.1 remains a mix of rateable and catchment areas, Drysides IDB amalgamated with Whittlesey IDB to form Whittlesey and District IDB in April 2011 – Appendix 3, Nordelph IDB – Appendix 2 – is in Norfolk etc	Without further detail it is unclear what items are perceived to have been missed out. Figure 3.1 needs to be amended to ensure any incorrect boundaries are removed.	Map 3.1 updated and checked with IDBs
Allan Simpson Anglian Water Services Ltd	3.2.13	F+W SPD:128	Have observations	Para 3.2.13 Reference is made to Anglian Water assessing the capacity of the public system to accept flows when an application is received for a sewer connection (section 106 of the Water Industry Act 1991). However, applications for sewer connections are made to Anglian Water once a site has the benefit of planning permission and the details of the site have been approved. Anglian Water assesses the capacity of public sewers as part of our pre-application service and when	This comment has been made previously (appears to be a duplicate) under F+W SPD:130 and therefore no additional changes are required	No change

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Consultee Name	Chapter or Para No.	Comment ID	Support/ Observations / Object	Comment	Councils' assessment	Action
				responding to planning application consultations from Local Planning Authorities. Anglian Water is normally referred to as sewerage undertaker. It is therefore proposed that paragraph 3.2.13 should be amended as follows: 'Anglian Water is also the sewer **age** undertaker….. Anglian Water needs to ensure that the public system has the capacity to accept these flows ~~. This is assessed when an applicant applies for a sewer connection~~ **as part of the pre-application service provided by Anglian Water** . Information about Anglian Water's development service is available on their website. **Anglian Water also comments on the available capacity of foul and surface water sewers as part of the planning application process'** It is also important to note that our response to the planning application will be based on the details completed in the application form and supporting details. We will not assess capacity if the proposed method of drainage does not interact with an Anglian Water operated system.		
Mr Richard Whelan	Map 3.2: Cambridge Water and	F+W SPD:40	Have observations	Map 3.2 Camb Water and AW coverage; is it worth having two maps? One for clean and one for waste? 3.2 may seem confusing; whilst it is described in 3.2.13 it is not overly clear	It may be possible to have two maps; however the document is already lengthy and this would add another page. A note should be added to this page to reiterate that	Note added to Map 3.2 to reiterate 3.2.13

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	Anglian Water coverage				foul water is dealt with solely by Anglian Water	
Mr George Dann King's Lynn Drainage Board	Map 3.2: Cambridge Water and Anglian Water coverage	F+W SPD:118	Have observations	Map 3.2 - the note to this is shown on page 14, but needs to appear on page 13 with the map.	Acknowledged that some tables and their associated text have split between pages; this should amended for final draft	Note now shifted to same page as map 3.2
Mr Richard Whelan	3.2.16	F+W SPD:41	Have observations	Possibly revisit; seems to give the impression the LLFA have a maintenance or operational responsibility to ordinary watercourses. Believe this is a power rather than a duty.	Acknowledged that there is no responsibility of the LLFA to maintain ordinary watercourses therefore this needs to be made clearer	Paragraph 3.2.16 amended to, '*The LLFA has powers to require works to be undertaken to maintain the flow in ordinary watercourses that fall outside of an IDB districts'.* Due to other changes this is now 3.2.17
Mr George Dann King's Lynn Drainage Board	3.2.16	F+W SPD:120	Have observations	3.2.16 - the LLFA can also delegate the responsability to a different RMA, such as IDBs, as happens elswhere in the country.	Comment noted and this is correct, but the paragraph is not applicable to planning and could be confusing (section 13 of the FWMA does not apply to LLFA's planning function). Rather than introduce more text to explain all the LLFA's other functions under the FWMA this paragraph should be amended to remove reference to other RMAs as it would not be possible to list all here due to their different requirements	Paragraph 3.2.16 amended to '*The LLFA has powers to require works to be undertaken to maintain the flow in ordinary watercourses that fall outside of an IDB districts'* Due to other changes this is now 3.2.17

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Mr George Dann King's Lynn Drainage Board	3.2.17	F+W SPD:121	Have observations	3.2.17 - should mention not to be made of the Highways Agency?	Acknowledged and this should be added to the document	Addition made to end of paragraph 3.2.17 – *'In addition, Highways England operates, maintains and improves a number of motorways and major A roads across the County'*
Mr George Dann King's Lynn Drainage Board	3.2.19	F+W SPD:122	Have observations	3.2.19 - I think "in the majority of instances" should be deleted at the end of this section - the intention is to make sure that flooding and other similar risk are always effectively managed	Acknowledged - the phrase adds a level of ambiguity so should be amended	Paragraph 3.2.19 amended to '*Each of the five City and District Councils within Cambridgeshire are LPAs and assess, consult on and determine whether or not development proposals are acceptable, ensuring that flooding and other similar risks are effectively managed'* Due to other changes this is now 3.2.21
Mr George Dann King's Lynn Drainage	3.2.20	F+W SPD:123	Have observations	3.2.20 - I disagree. While this document should help to improve consultation with relevant WMAs, with planning application decisions it is, of course, the LPA that has to be satisfied that the surface water disposal and flood risk aspects have been appropriately dealt with. A key part of this is likely to be consulting with WMAs, so I do not consider it appropriate for any attempt to be made to pass this responsability entirely on to the developer. Doing so can only lead to more disputes and problems in the future.	Acknowledged – this should be made clearer in the final document. As part of the planning consultation process it is the responsibility of the LPAs to consult statutory consultees and not the applicant. Pre-application discussions are however always encouraged.	Paragraph 3.2.20 amended to '*The LPA will consult the relevant statutory consultees as part of the planning application assessment and they may, in some cases also contact non-statutory consultees (e.g. Anglian Water or IDBs) that have an interest in the planning application'* Due to other changes this is now 3.2.22
Allan Simpson Anglian Water Services Ltd	3.2.20	F+W SPD:129	Have observations	<u>Para 3.2.20</u> The final sentence of this paragraph states that it is responsibility of applicants to consult relevant WMAs. It is unclear what is intended as the Local	Acknowledged – this should be made clearer in the final document. As part of the planning consultation process it is the responsibility of the LPAs to consult statutory consultees and not the applicant. Pre-	Paragraph 3.2.20 amended as part of F+W SPD:123 and also covers F+W SPD:129. '*The LPA will consult the relevant statutory consultees as part of the planning application assessment and they may, in some cases also contact non-statutory*

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				Planning Authority (LPA) is responsible for consulting statutory and non-statutory consultees as part of the planning application process. Applicants should be encourage to consult relevant bodies including Anglian Water as part of the pre-application process. It would also be helpful if it was made clear that LPAs are required to consult statutory consultees as but they also consult relevant bodies including Anglian Water who have interest in a planning application and managing flood risk.	application discussions are however always encouraged.	*consultees (e.g. Anglian Water or IDBs) that have an interest in the planning application'* Due to other changes this is now 3.2.22
Miss Kayleigh Wood Historic England	3.2.21	F+W SPD:9	Have observations	We would advise that the words 'and their setting' are included after 'Whilst Historic England are not a WMA, they should be consulted where proposals may affect heritage assets'. We would advise this wording is included for clarity and to ensure the significance of Heritage Assets is not damaged due to inappropriate development within their setting.	Acknowledged – this should be included in final document	Wording amended to, '*Whilst Historic England is not a WMA, it should be consulted where proposals may affect heritage assets and their setting*'
Mr Richard Whelan	3.2.21	F+W SPD:42	Support	Table 3.2 very good way of displaying this information	Support acknowledged	No change
Allan Simpson Anglian Water Services Ltd	Table 3.2: Simplified table of key water management authoriti	F+W SPD:133	Have observations	<u>Drainage Proforma for Consideration and Submission at Outline, Full or Reserved Matters</u> Section 3 asks applicants to identify the proposed method of surface water disposal. It is important that other methods of surface water disposal are investigated prior to	Acknowledged – on occasion there are times when it is unclear to the LLFA/water company whether the other has been consulted and what their response was. This amendment should help reduce any confusion and make it clearer for the LPAs when reviewing applications	Amended text to '*Evidence should be provided to the LPA and sewerage undertaker to demonstrate that it is not possible to discharge surface water via infiltration or to a watercourse in accordance with Part H of Building Regulations'*

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	es that may need to be consulted during the planning application process on flood and water matters			applicants proposing to connect to surface water sewers (where available). It is therefore proposed that the row entitled 'To Surface Water Sewer' should be amended as follows: '**Evidence should be provided to the LPA and sewerage undertaker to demonstrate that it is not possible to discharge surface water via infiltration or to a watercourse in accordance with Part H of Building Regulations.**The confirmation from sewerage provider undertaker that sufficient capacity exists for this connection'		
Adam Ireland Environment Agency	4 Guidance on managing flood risk to developments and site selection	F+W SPD:75	Support	Section 4: We generally support this section and the guidance it provides on sequential approach process and how the various tests and evidence bases inform it. In the case of *The Environment Agency vs Tonbridge and Malling*, the process of the sequential test was confirmed as being a vital part of the decision making process. The lack of understanding and process structure of these tests, in EAs experience, is the single most significant factor leading to flood risk being 'expedited' and overridden at the planning application stage. The SPD reduces the risk of challenge by helping to make this process clearer.	Support acknowledged	No change

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Adam Ireland Environment Agency	4.1.2	F+W SPD:76	Have observations	4.1.2 – look up definition of risk – it is based on probability of occurrence and the impact. Low impact but high frequency events can equal low risk and vice versa. Suggest wording for 4.1.2 replaced with: "Flood risk is an expression of the combination of the flood probability (how likely the event will happen) and the magnitude of the potential consequences (the impact such as economic, social or environmental damage) of the flood event."	Acknowledged and to be incorporated into final document	Paragraph 4.1.2 has been amended to '*Flood risk is an expression of the combination of the flood probability (how likely the event will happen) and the magnitude of the potential consequences (the impact such as economic, social or environmental damage) of the flood event*'
Adam Ireland Environment Agency	4.1.3	F+W SPD:77	Have observations	4.1.3 We think this section needs to be looked at in greater detail or we suggest the following wording: "The likelihood or risk of flooding can be expressed in two ways: - Chance of flooding: As a percentage of flooding each year, for example for flood zone 3a there is a 1% annual probability of this area flooding. - As a return period: return period is a term used to express the frequency of flood events. It refers to the estimated average time interval between events of a given magnitude. However it is misleading to say that a 1% annual probability flood will only occur once in every hundred years. This suggests that if it occurs in one year then it should not be expected to reoccur again for another 100 years. This is not the case. It simple means it is such an extreme 'rare event that we would not expect it to occur often but an area could be affected by a 1% flood event over several years. It is important to recognise that a 1% flood event has a	Acknowledged and to be incorporated into final document	Paragraph 4.1.3 amended to '*The likelihood or risk of flooding can be expressed in two ways:* ▪ *Chance of flooding: As a percentage chance of flooding each year. For example, for Flood Zone 3a there is a 1% annual probability of this area flooding* ▪ *Return period: This term is used to express the frequency of flood events. It refers to the estimated average time interval between events of a given magnitude. For example, for Flood Zone 3a the return period would be expressed as 1 in 100 year* '

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				26% probability of being equalled or exceeded at least once in every 30 years (the duration of a typical mortgage and a 49% probability of being equalled or exceeded at least once in 70 years (a typical human lifetime)."		
Adam Ireland Environment Agency	4.1.6	F+W SPD:78	Have observations	4.1.6 - update to Gov.uk. NB the EA website does not exist anymore	Acknowledged and to be incorporated into final document	Paragraph 4.1.6 amended to, '*Maps showing Flood Zones are available on the .GOV website. The Flood Zones refer to the probability of river and sea flooding, ignoring the presence of defences. Table 4-1 details the Flood Zones and their definitions taken from the NPPG'*
Adam Ireland Environment Agency	4.1.7	F+W SPD:79	Have observations	4.1.7 – we believe it's worth referencing that developments have to be safe for its life time so climate change is a key consideration in planning.	Acknowledged and to be incorporated into final document	Paragraph 4.1.7 amended to *'To cope with the potential risks and forecasts of climate change (predicted 1.05m rise in sea levels in the East of England, warmer summers, wetter winters and increased river flows by 2115) and to ensure that new development is safe for its lifetime, the Government has emphasised that development in areas at risk of flooding should be avoided by directing development away from the highest risk areas. Where development is necessary it should be made safe without increasing flood risk elsewhere'*
Mr John Oldfield Bedford Group of IDBs	4.3.1	F+W SPD:55	Have observations	This section should highlight that there is also a requirement to obtain Consent from EA/IDB/LLFA if the discharge is into a surface water system (River/Watercourse) or the Sewage Undertaker if connecting to a public sewer. Early consultation with the relevant authority is recommended.	Although this is not a direct planning issue it is acknowledged that it would be useful to include it for developers as it still facilitates development.	Addition made to step 3 (after paragraph 4.5.10) – (i) – *'Are any consents required from the EA/IDB/LLFA/Anglian Water'.* Due to other changes this is now after paragraph 4.3.9

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Adam Ireland Environment Agency	4.3.1	F+W SPD:80	Have observations	4.3 - for those sites that are shown to be at risk of other sources of flooding – do they need to show that they have passed the sequential test as well? This has been raised later in the document but would be beneficial to introduced first here. In section 4.3 we agree with the steps and stages. However, the heading hierarchy needs reworking so its clearer which step/stage/process is which. In section 4.3 need to rethink where the ST and ET sit within the These test and key steps should be named in the 4.3.1 section. 4.3 Steps - can the steps be named? It makes it clear what each step involves. Step 1 – Site Allocation etc. Consider 4.3.1 as a flow diagram or somehow emphasizing that this is a summary of the steps, and where the Stages A-E slot in.	Acknowledged and agree – all sources of flooding should be considered.	Chapter 4 amended to make it more reader friendly (see action on comments F+W SPD:39). Steps have now been named within each box. Step 1 – *Consider allocations* *Step 2 – Consider flood risk* *Step 3 – undertake pre-application consultation* *Step 4 – Site specific flood risk assessment (FRA)* *Step 5 – Surface water drainage strategy* *Step 6 – Submission of planning application*
Mr Andy Brand The Abbey Group (Cambridgeshire) Ltd	4.3.2	F+W SPD:20	Object	I am uneasy regarding this point as PPG paragraph Paragraph: 033Reference ID: 7-033-20140306 is at odds with this. The development plan is intended to give certainty to developers and the latter sentences in this paragraph erode this. If the change in the flood risk zone is so fundamental then the Local Plan should be reviewed and amended. It is inappropriate and at odds with national policy to do otherwise. Criteria b. of Step 1 should be deleted.	Acknowledged – part b) can be amended to reflect this point	Part b) amended to: *b) Can it be demonstrated that the flood risk information contained within the SFRA and associated Sequential Test assessment accompanying the Local Plan/development plan (where applicable) is still appropriate for use*

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Adam Ireland Environment Agency	4.3.3	F+W SPD:81	Have observations	4.3.3 'land use type wording in first sentence' perhaps the words could include: "land use type considering the vulnerability classification." Step 2 last sentence in box – It would be useful to make it clear that at this stage discussions on Exception Test should not be taking place until the ST is undertaken and passed. General – use of acronyms – perhaps chance to use more acronyms in view of glossary in the back. The use of long terms (Strategic Flood Risk Assessment to name one specific example) makes some sections hard to read. Step 2 b) really hard to get what this means – we recommend rewording this to bring clarity. Step 2 c) what is deemed 'significant flood risk' could leave out the term significant – the exception test may determine this.	Acknowledged – important to include vulnerability classification as this is key within the NPPF. Agree Exception Test should not commence until ST passed as this needs to be reinforced through the SPD. Acronyms should be used as much as possible throughout the report. Agree wording of step 2b) may be confusing and this should be amended appropriately. Agree the word 'significant' is subjective and should be reworded appropriately	Paragraph 4.3.3 amended to '*Applicants must consider allocations within the relevant local development plan. If the site has been allocated in the relevant Local Plan/development plan for the same land use type/vulnerability classification that is now being proposed, then an assessment of flood risk, at a strategic level, has already been undertaken. This will have included assessing the site, against other alternative sites, as part of a Sequential Approach to flood risk*'. Due to other changes this is now paragraph 4.3.4 In Step 2 box added, *'Note: Discussions on the Exception Test should not be taking place until the Sequential Test is undertaken and passed. Further information on the Sequential and Exception Tests can be found in Sections 4.4 and 4.5 respectively'* Acronyms updated throughout document Amended part b) of Step 2 to *'In Flood Zone 1 and within an area that has been identified in the relevant SFRA (or any updated available information) as having flooding issues now or in the future (for example, through the impacts of climate change)?* Amended part c) of Step 2 to '*In an area of flood risk from sources other than fluvial or tidal such as surface water, ground water, reservoirs, sewers, etc? (See Stage C of the Sequential Test for details).'*

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Adam Ireland Environment Agency	4.4.2	F+W SPD:82	Have observations	4.4.2 - Sequential test is hard to apply for small scale developments i.e. 1-10 dwellings. Is this SPD to provide any specific guidance for this scale of development?	The SPD does not provide specific guidance on small scale developments	No change
Harry Jones of David Lock Associates for Tim Leathes Urban and Civic	4.4.2	F+W SPD:147	Have observations	Requirement for the Sequential Test U&C is concerned that the document lacks clarity regarding the requirement for developers to provide evidence in relation to the sequential test and this should be more explicit within the document. For example, text could be added to paragraph 4.4.2 to indicate that the sequential test does not need to be applied for sites located in flood zone 1 and this would reflect the National Planning Policy Framework (NPPF) - paragraph 100 and 101.	Detail on the requirements of the Sequential test is provided within the NPPF and PPG – we don't to lift large sections of national policy and repeat within the PPG. Additional bullet point to be added to reiterate ST not required for sites in FZ1	Added additional bullet point to Paragraph 4.4.2. *'iii) Sites location wholly in Flood Zone 1'*
Mr Andy Brand The Abbey Group (Cambridgeshire) Ltd	4.4.6	F+W SPD:21	Object	The text below the bullet points in Stage D implies that, as the existing defences are not to be taken into account, the SFRA is not to be used for the purposes of the sequential test. PPG para Paragraph: 010Reference ID: 7-010-20140306 confirsm that the SFRA is to be used so this wording needs amendment to be consistent with national policy. The bold text at the end of Stage E is also confusing and requires amendment.	Disagree that this suggests the SFRA should not be used as these documents provide a large amount of other detail as well that will be useful for the ST. Bold text appears to contain a number of typos which have caused it to lose its meaning. Wording needs to be amended.	Wording of bold text in Stage E amended to *'If no, this still does not mean that the proposed development is acceptable in terms of flood risk as it may be necessary to undertake the Exception Test and a site specific FRA'*
Adam Ireland Environment	4.5.1	F+W SPD:83	Have observations	4.5.1 Is this sentence suggesting the ST has been passed, if so perhaps it should be	Yes – ET should only be undertaken upon passing of the ST as	Paragraph 4.5.1 amended to *'As explained within paragraph 102 of the NPPF, the*

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Agenc				stated here?	highlighted by other representations.	*Exception Test is applied to the proposal by the developer where, following application of the Sequential Test it is not possible, consistent with wider sustainability objectives, for the development to be located in zones with a lower risk of flooding'*
Mr Andy Brand The Abbey Group (Cambridgeshire) Ltd	4.5.5	F+W SPD:23	Have observations	Typographical error on the fourth line.	The tick included within the Word document has transferred incorrectly into the publishing programme. This needs to be amended in final document.	Paragraph 4.5.5 amended to replace typographical error with a 'tick'
Mr Andy Brand The Abbey Group (Cambridgeshire) Ltd	4.5.6	F+W SPD:22	Have observations	This text confirms that the SFRA is to be used for the sequential test - the previous text (see my other comments on page 24 of the Draft SPD) requires revision to reflect this.	Agree this paragraph could be amended to reinforce point made previously relating to ignoring presence of defences. Add footnote in.	Footnote added to text in Exception test box (below paragraph 4.5.6). '*Ignoring the presence of defences'*
Miss Kayleigh Wood Historic England	4.5.8	F+W SPD:10	Object	We would advise the replacement of the words 'cultural heritage' with 'the Historic Environment'. The 'Historic Environment' is an all-encompassing term which takes into account the physical built heritage and archaeology for example, but also the less tangible elements such as the sense of place and time depth and cultural heritage	Acknowledge - this can be replaced	Third bullet point of Paragraph 4.5.8 amended to '*Landscape, townscape and historic environment*
Mr Andy Brand The Abbey Group (Cambridgeshire) Ltd	4.5.9	F+W SPD:24	Object	The suggestion that new housing may not be sufficient by itself in order to outweigh flood risk is a general assertion and may not be applicable to individual circumstances. If this is the view of the Councils then it should be tested properly through the Local Plan	The words 'not normally' provides caveat for times where this will change; however it can be added in that applicants should check with the LPA each time.	Amended paragraph 4.5.9 to '*Any development undertaking the Exception Test should demonstrate the sustainability issues that the proposal is seeking to address. The general provision of housing by itself would not normally be considered as a wider sustainability benefit to the community which*

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				examination.		*would outweigh flood risk; however confirmation should be sought from the LPA'*
Mrs Ellie Henderson	4.5.10	F+W SPD:29	Object	We would ask that you amend the sentence as follows: new community facilities such as a park, woodland, community centre, cycle ways/ footways or other infrastructure which allow the community to function in a sustainable way. Rationale: The Woodland Trust believes that woodland creation is especially important because of the unique ability of woodland to deliver across a wide range of benefits – see our publication ***Woodland Creation – why it matters*** (http://www.woodlandtrust.org.uk/en/about-us/publications/Pages/ours.aspx). These include for both landscape and biodiversity (helping habitats become more robust to adapt to climate change, buffering and extending fragmented ancient woodland), for quality of life and climate change (amenity & recreation, public health, flood amelioration, urban cooling) and for the local economy (timber and woodfuel markets). In terms of 'allowing the community to function in a sustainable way' - trees help to improve air quality, reduce the heat island effect and provide a local source of fuel. In terms of water management:	Acknowledge – add woodland into text here.	Paragraph 4.5.10 amended to *'Examples of wider sustainability benefit to the community that would be considered could include the regeneration of an area, or the provision of new community facilities such as green infrastructure, woodland community centres, cycle ways/footways or other infrastructure which allow the community to function in a sustainable way'*

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				Woods, trees and hedgerows can play a key role in water management whether reducing flood risk, improving water quality or helping freshwater wildlife thrive and survive - see the Woodland Trust publication ***Woodland actions for biodiversity and their role in water management*** (pdf) - https://www.woodlandtrust.org.uk/publications/2008/03/woodland-actions-for-biodiversity-and-their-role-in-water-management/		
Mr John Oldfield Bedford Group of IDBs	4.6.2	F+W SPD:56	Support	Pleased the guidance refers to Byelaws, as these can often be overlooked at an early stage, and then later can compromise the developable areas.	Bylaws already referred to throughout document (3.2.8, 6.3.34, 7.5.3) and as it doesn't strictly relate to planning we don't need to also add it in here	No change
Mr Andy Brand The Abbey Group (Cambridgeshire) Ltd	4.6.3	F+W SPD:25	Have observations	This reads as if the FRA is to be submitted to MLC only whereas it would normally be submitted to the LPA.	Although it is acknowledged the MLC have their own requirements for FRAs these do not strictly relate to the planning application process. In addition, if we are to list the requirements of the MLC then the requirements of all other WMAs should also be listed. The section relating to MLCs requirements should therefore be removed and replaced with reference to IDBs in general	Paragraph 4.6.3 amended to '*In some cases, a development meeting the criteria listed below may need to submit a FRA to the IDBs to inform any consent applications. This relates to the IDBs' by-laws under the Land Drainage Act 1991*[1] *(further information on the preparation of site specific FRAs can be found in Chapter 4).* ▪ *Development being either within or adjacent to a drain/watercourse, and/or other flood defence structure within the area of an IDB;* ▪ *Development being within the channel of any ordinary watercourse within an IDB area;*

[1] Land Drainage Act 1991 stipulates the relevant drainage districts powers and duties.

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						▪ *Where a direct discharge of surface water or treated effluent is proposed into an IDBs catchment;* ▪ *For any development proposal affecting more than one watercourse in an IDBs area and having possible strategic implications;* ▪ *In an area of an IDB that is in an area of known flood risk;* ▪ *Development being within the maintenance access strips provided under the IDBs byelaws;* ▪ *Any other application that may have material drainage implications'* Due to other changes this has been moved to paragraph 3.2.8
Mr Richard Whelan	4.6.3	F+W SPD:35	Have observations	Not very easy to follow 4.6.3 Should this read submit an FRA to the LPA who will in turn consult the MLC?	Acknowledge – this relates directly to comment F+W SPD:25 (see comments/actions)	Same action as for comment F+W SPD:25
Adam Ireland Environment Agency	4.6.3	F+W SPD:84	Have observations	4.6 Box last section page 29 would it not be useful for all LPAs to add an additional no 5 bullet point: Where evidence of historical or recent flood events have been passed to the LPA, then a FRA may be requested. 4.6.3 – 'A development proposal meeting the following criteria is required by...' [say whom] "in an area of known actual flood risk within the Middle Level Commissioner's area" – how is this flood risk mapped? It is not possible to separate out the fluvial risk form the MLC network from the Ouse/Nene flood zones. Last bullet point on section 4.6.3 at top of	Acknowledge – where a development site is located within FZ1 but there is history of flooding the LPA may ask for a FRA – additional point should be added to this list. Comments on 4.6.3 relates directly to comment F+W SPD:25 (see comments/actions)	Box in Section 4.6 – Additional 5th bullet point added in '*where evidence of historical or recent flood events have been passed to the LPA'* Due to other changes this is now 4.3.11

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				page 30 may over assume MLC powers. How can MLC set such a wide ranging demand?		
Mr Andy Brand The Abbey Group (Cambridgeshire) Ltd	4.6.4	F+W SPD:26	Have observations	To whom must it be demonstrated?	Comments on 4.6.3 relates directly to comment F+W SPD:25 (see comments/actions)	Entire paragraph removed
Miss Kayleigh Wood Historic England	4.7.2	F+W SPD:11	Support	We welcome the inclusion of the consideration of the effects of a range of flood events on the Historic Environment.	Acknowledged – no actions required	No change
Mr John Oldfield Bedford Group of IDBs	4.7.2	F+W SPD:57	Have observations	This section should include reference to consultation with the IDB if the site is in a Drainage District.	This is also applicable for all other WMAs – a line should be added in to this effect.	Text added to Paragraph 4.7.2 *'In the preparation of FRAs, applicants are advised to consult the relevant WMAs'.* Due to other changes this is now 4.3.13. Box updated as action to F&W SPD:55. First sentence of Step 3 (now 4.3.9) updated to '*Meaningful, on-going and iterative discussions with the LPAs and relevant WMAs can resolve issues prior to the submission of a planning application and can result in a more efficient planning application process'*
Adam Ireland Environment Agency	4.7.2	F+W SPD:85	Have observations	4.7.2 – 'FRA should' box –is this ordered in a logical way? If not can it? Bullet point (d) ' take the impacts of climate change into account', then add "for the lifetime of the development."	On reflection the order could be improved here. The order should reflect the order in which activities are undertaken as part of a FRA.	List updated to following order, *a) **Be proportionate** to the risk and appropriate to the scale, nature and location of the development;* *b) Be undertaken **as early as possible** in the particular planning process, by a*

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						competent person, to avoid abortive work raising landowner expectations where land is unsuitable for development; *c) Consider and quantify the **different types of flooding** (whether from natural or human sources and including joint and cumulative effects). The LPA will expect links to be made to the management of surface water as described in Chapter 6. Information to assist with the identification of surface water and groundwater flood risk is available from the LLFA (CCC), the EA and the LPA. Applicants should also assess the risk of foul sewage flooding as part of the FRA. Anglian Water as sewerage undertaker can provide relevant information to the applicant to inform preparation of FRAs* *d) Consider the effects of a range of flooding events including the **impacts of extreme events** on people, property, the natural and historic environments and river processes;* *e) Consider the **vulnerability of occupiers and users** of the development, taking account of the Sequential and Exception Tests and the vulnerability classification, and include arrangements for safe access;* *f) Identify relevant **flood risk reduction measures** for all sources of flood risk;* *g) Consider both the potential adverse and beneficial **effects of flood risk management infrastructure** including raised defences, flow channels, flood storage areas and other artificial features*

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						together with the consequences of their failure; *h) Include assessment of the **'residual' (remaining) risk** after risk reduction measures have been taken into account and demonstrate that this risk is acceptable for the particular development or land use. Further guidance on this is given in Chapter 5;* *i) Be supported by appropriate **evidence data** and information, including historical information on previous events.* *j) Consider the risk of **flooding arising from the proposed development** in addition to the **risk of flooding to development on the site**. This includes considering how the ability of water to soak into the ground may change after development. This would mean the preparation of surface water drainage proposals;* *k) Take a **'whole system**' approach to drainage to ensure site discharge does not cause problems further along in the drainage sub-catchment/can be safely catered for downstream and upstream of the site;* *l) Take the impacts of **climate change** into account for the lifetime of the development including the proposed vulnerability classification. Guidance is available on the .gov.uk website.*

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Allan Simpson Anglian Water Services Ltd	4.7.2	F+W SPD:131	Have observations	<u>Para 4.7.2</u> The text box which follows para 4.7.2 refers to all sources of flooding but does not include a specific reference to the risk of foul sewage flooding. Flood Risk Assessments which are submitted with planning applications should consider the risk of flooding from foul sewage together with other potential sources of flooding. It is therefore suggested that the text should be amended as follows: 'consider and quantify....and the LPA. **Applicants should also assess the risk of foul sewage flooding as part of the FRA. Anglian Water as sewerage undertaker can provide relevant information to applicant to inform preparation of FRAs**'	Acknowledged and this should be added in.	Amended point h) of box to *Applicants should also assess the risk of foul sewage flooding as part of the FRA. Anglian Water as sewerage undertaker can provide relevant information to the applicant to inform preparation of FRAs'.* Due to other changes this is now point c).
Adam Ireland Environment Agency	4.8.1	F+W SPD:86	Have observations	4.8.1 - is it essential that the drainage strategy has to be within the FRA? There are benefits of having a separate drainage strategy document to the FRA as there are more issues to drainage than just flood risk. By always having it in the FRA, other considerations are often ignored. The findings of the drainage strategy should definitely be within the FRA.	It is not essential and can be provided in a separate document. The section should be updated to reflect this.	Paragraph 4.8.1 amended to '*A surface water drainage strategy contains the proposals for the surface water drainage of the development. Such a strategy should include initial proposals that are sufficient to demonstrate a scheme can be delivered that will adequately drain the proposed development whilst not increasing flood risk elsewhere'* Due to other changes this is now 4.3.14

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Adam Ireland Environment Agency	4.8.2	F+W SPD:87	Have observations	4.8.2 add the word 'outline' rather than 'conceptual' for accuracy.	Acknowledged and will change	Paragraph 4.8.2 amended to '*If an outline application is to be submitted for a major development then an outline surface water drainage strategy should be submitted outlining initial proposals and quantifying the conceptual surface water management for the site as a whole. This should detail any strategic features, including their size and location. A detailed surface water drainage strategy should subsequently be submitted with each reserved matters application that comes forward and demonstrate how it complies with the outline surface water drainage strategy*'
Adam Ireland Environment Agency	4.8.2	F+W SPD:88	Have observations	Step 6) B) should maintenance be included in the list?	This is already included in point c); therefore no changes required	No change
Miss Kayleigh Wood Historic England	5 Managing and mitigating risk	F+W SPD:12	Object	Whilst it is appreciated that the SPD will centre upon issues directly surrounding flood and water within the district it is considered that the document should provide more information on the likely impacts on the Historic Environment, more specifically, as examples: • The opportunities for conserving and enhancing heritage assets as part of an integrated approach for catchment based flooding initiatives, this including sustaining and enhancing the local character and distinctiveness of historic townscapes and landscapes. • The potential impact of changes in groundwater flows and chemistry	Acknowledged – happy to add additional references to historic environment where appropriate	'*historic environment'* added into 3rd bullet point of 4.5.8 '*historic environment'* added into overview of Chapter 6

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				on preserved organic and palaeo-environmental remains. Where groundwater levels are lowered as a result of measures to reduce flood risk, this may result in the possible degradation of remains through de-watering, whilst increasing groundwater levels and the effects of re-wetting could also be harmful. • The potential impact on heritage assets of hydromorphological adaptations. This can include the modification/removal of historic in-channel structures, such as weirs, as well as physical changes to rivers with the potential to impact on archaeological and palaeo-environmental remains. • The potential implications of flood risk on securing a sustainable use for heritage assets, including their repair and maintenance. • Acknowledgment that Historic Buildings, for example, can be damaged by standard Flood Risk Management and Mitigation and often need a tailored approach. • The opportunities for improving access, understanding or enjoyment of the Historic Environment and heritage assets as part of the design and implementation of flood and water management proposals. • The vulnerability of most heritage assets (designated and non-designated) to flooding, including occasional flooding, and the potential harm to or loss of their significance. • The opportunity for increasing		

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				public awareness and understanding of appropriate responses for heritage assets in dealing with the effects of flooding and improving resilience. For further information please see link to our guidance on Flooding and Historic Buildings: http://historicengland.org.uk/images-books/publications/flooding-and-historic-buildings-2ednrev/ It is considered that specific paragraphs on the Historic Environment could be provided within Section 5 Managing and Mitigating Risk.		
Adam Ireland Environment Agency	5.1.4	F+W SPD:89	Have observations	5.1.4 - Breach mapping – reference should be given to methods outlined in FD2320/1: flood risk to people. 5.1.4 – Instantaneous breaches – this does define what an Instantaneous breach is i.e. opens to the full extent within a very short time frame (seconds). This replicates a sudden failure. This could be expanded to explain when each type should be used. Note a recent study by the EA demonstrates that there is little difference in the flood extents etc depending upon what method is used.	Rather than repeat long sections of the document a link to the FD2320/1 should be provided within the SPD. Similarly, the above document provides detail on breaches that readers of the SPD may refer to as appropriate	Added *'(see the Environment Agency's publication – Flood Risk Assessment Guidance for New Development for further information)'* to Paragraph 5.1.4
Adam Ireland Environment Agency	5.1.5	F+W SPD:90	Have observations	5.1.5 – this doesn't refer to what type of breach model was used. It would be worth adding this in.	We have not received any detail from the EA as to what type of model was used therefore no changes proposed to the SPD	No change

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Mr Andy Brand The Abbey Group (Cambridgeshire) Ltd	5.1.9	F+W SPD:27	Object	Please see my previous comments which are applicable here also. If the flood zone changes then the Local Plan should be reviewed. The development plan is integral to providing certainty to the development industry.	Discussed with steering group- EA flood maps may be updated every quarter; therefore it would be inappropriate to update Local Plans every time.	No change
Adam Ireland Environment Agency	5.1.9	F+W SPD:91	Have observations	5.1.9 – the Environment Agency also hold data on climate change impacts of flood levels for the areas covered by recent models. This data is going to be released before the end of the year so it would be worthwhile the climate change scenarios referring to the 'latest guidance'.	Acknowledged – paragraph reworded in the SPD	Paragraph reworded anyway due to changes to climate change allowances issued in March 2016
Harry Jones of David Lock Associates for Tim Leathes Urban and Civic	5.1.10	F+W SPD:146	Have observations	The Master Planning Process Flood risk, management of the water environment and the design of SuDS are best considered as part of a holistic master planning process. Flood and water issues are not a singular topic but one of a range of issues and constraints that are taken into account in planning and design. In this context U&C suggest that the draft SPD should highlight the importance of ensuring that the draft SPD recognises that these issues including the design of SuDS are one of a number of influences on the preparation of a master plan. Specifically, it is considered vital that the guidance recognises the applicability of the different tiers of SuDS design at each stage of the planning process. A proportionate approach to SuDS, tailored to the planning process, is essential to ensure the correct	Chapter 6 already includes steps in the planning process to ensure SuDS are considered as early as possible and paragraph 5.1.10 already directs readers to Chapter 6 therefore no changes proposed.	No change

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				level of detail is provided at the right time. For example only limited detail should be expected at strategic stages of allocation and outline consent compared to requirements for the detailed stages of Design Codes and Detailed/Reserved Matters consents. Therefore there should be flexibility to enable SuDS design to evolve with the wider development. U&C suggest that text acknowledging the above could be added to section 5 – paragraphs 5.1.10 to 5.1.16 which relate to site layout		
Mrs Ellie Henderson	5.1.11	F+W SPD:30	Object	We would like to see trees mentioned as a key part of GI. See suggested ammendment below: The inclusion of good quality green infrastructure (in particular trees) within a development master plan has the potential to significantly increase the profile and profitability of developments. Low lying ground can be designed to maximise benefits by providing flood conveyance and storage as well as recreation, amenity and environmental purposes. Where public areas are subject to flooding easy access to higher ground should be provided. Structures, such as street furniture and play equipment, provided within the low lying areas should be flood resistant in design and firmly attached to the ground. The Woodland Trust believes that woodland creation is especially important for green infrastructure provision because of the unique ability of woodland to deliver across a wide range of benefits – see our publication	Acknowledge – can include trees here; however rather than the use of 'in particular' which implies trees are always important, the word 'including' should be used.	Paragraph 5.1.11 amended to '*The inclusion of good quality green infrastructure (including trees and other vegetation) within a development master plan has the potential to significantly increase the profile and profitability of developments. Low lying ground can be designed to maximise benefits by providing flood conveyance and storage as well as recreation, amenity and environmental purposes. Where public areas are subject to flooding easy access to higher ground should be provided. Structures, such as street furniture and play equipment, provided within the low lying areas should be flood resistant in design and firmly attached to the ground'.* Due to other changes this is now paragraph 5.1.14

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				Woodland Creation – why it matters (http://www.woodlandtrust.org.uk/en/about-us/publications/Pages/ours.aspx). **The Case for Trees (Forestry Commission, July 2010)** states: 'There is no doubt that we need to encourage increased planting across the country – to help meet carbon targets – and every tree can count towards those targets as part of a renewed national effort to increase the country's overall woodland canopy. But it's not all about carbon; there is a growing realisation among academics about the important role trees play in our urban as well as the rural environment. It has long been accepted and confirmed by numerous studies that trees absorb pollutants in our cities with measurable benefits to people's health – such as reducing asthma levels. Yet trees also deliver a whole host of other extraordinary economic, environmental and social benefits.' The report goes on to say: 'The development of the space in which we live and work represents an opportunity for change that may not be repeated for many years. Making the right decisions at these pivotal moments can influence peoples' sense of place, health and wellbeing for generations.'		

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Mr John Oldfield Bedford Group of IDBs	5.1.12	F+W SPD:58	Have observations	The opportunity to strengthen the need for reducing flood risk should be taken whenever possible. 'should' will give officers more room to negotiate betterment in the future than saying 'can' ".....the proposed development should ~~can~~ offer flood risk betterment by holding back flood flow peaks....."	Acknowledge and agree – change can to should.	Amended wording of paragraph 5.1.12 to *Site layout does not only have to cater for the flood risk on the site but can also accommodate flood water that may contribute to a problem downstream. For example, where a proposal has a watercourse flowing through which contributes to flooding downstream in the existing community or further downstream within an adjacent community, the proposed development should offer flood risk betterment by holding back flood flow peaks within the site in a green corridor and by making space for this water. This is a proactive approach to flood risk management in Cambridgeshire where new developments offers enhancements to the surrounding area. All developments with watercourses identified within their site must consider this approach.* Due to other changes this is now 5.1.15
Mr John Oldfield Bedford Group of IDBs	Figure 5.1: Upper river catchment development ©BACA Architects	F+W SPD:60	Have observations	the figure should include reference to the Byelaw zone adjacent to the watercourse/river and show a clear working bank for maintenance access	Unable to change layout as this is a fixed layout	No change
Mr John Oldfield Bedford Group	Figure 5.2: Middle	F+W SPD:59	Have observations	Figure should refer to Byelaw zone adjacent to watercourse/river and show clear working	Unable to change layout as this is a fixed layout	No change

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of IDBs	river catchment development ©BACA Architects			bank		
Mr John Oldfield Bedford Group of IDBs	Figure 5.3: Lower river catchment development ©BACA Architects	F+W SPD:61	Have observations	The figure should show Byelaws relating to river and also to flood defences.	Unable to change layout as this is a fixed layout	No change
Adam Ireland Environment Agency	5.1.15	F+W SPD:92	Have observations	5.1.15 perhaps signpost in this section to FD2320 an excellent government research document on the hazards of flooding.	Acknowledge – provide link to this document here	Added *'A guidance document titled 'Flood Risks to People' was published by Defra/EA in 2006 which developed a method for estimating risks to people, both during and immediately after a flood event. This document contains useful information on the hazards of flooding'* added to paragraph 5.1.15. Due to other changes this is now 5.1.21
Adam Ireland Environment	5.1.17	F+W SPD:93	Have observations	5.1.17 "Where it is not possible to avoid flood risk or minimise it through site layout, raising floor levels above the predicted flood	Acknowledge – change exit to egress. 'Safe' is referred to with no definition	Paragraph 5.1.17 reworded to '*Where it is not possible to avoid flood risk or minimise it through site layout, raising floor levels above*

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Agency				level with an allowance for the life time of the development (climate change allowance)" – doesn't make much sense in the context - allowance for the impacts of climate change over the life time of the development maybe. 5.1.17 – Consider changing 'exit' to 'egress' Safe access and egress – this mentioned numerous times in the SPD but is never classified – what is classed as 'safe'. The Environment Agency will object to any application that has a greater hazard rating the 0.75 (FD2320) but makes no comments on the wider issue of safety. This should be expanded upon. The subsequent section on resilience planning could be sign posted.	and therefore reference should be made to the Flood Risks to People document throughout (wherever safe is mentioned). Reference to the Flood Risks to People document should be made throughout the SPD whenever 'safe access' is referred to.	*the predicted flood level (including an appropriate allowance for climate change) is a possible option in some circumstances to manage flood risk to new developments however this can increase flood risk elsewhere; it can create an 'island effect' with surrounding areas inundated during a flood, makes access and egress difficult; can affect river geomorphology; can have further potential impacts, such as erosion on site and changes to erosion and sedimentation elsewhere and can also have an impact on the landscape value and amenity of the river flood plain'.* Due to other changes this is now 5.1.23 *'Please see the Defra/EA publication 'Flood Risks to People' for further information on what is considered 'safe'.'* Added in to 4.1.7, 4.5.6 and 5.1.26
Adam Ireland Environment Agency	5.1.19	F+W SPD:94	Have observations	5.1.19 Access ramps can also take up flood storage so these also need to be considered within the overall loss of flood plain.	Acknowledged and this should be added in to section 5.1.19	Amended paragraph 5.1.19 to '*Raising floor levels can have an adverse impact on the street scene as building and feature heights will increase. In addition there may be implications for access ramps for wheelchairs which in turn can also take up flood storage leading to an overall loss of floodplain. Raising floor levels may also be significantly more difficult to achieve privacy standards with higher windows and this may also create the need for significantly higher boundary treatments or screens'.* Due to other changes this is now 5.1.25
Adam Ireland Environment	5.1.22	F+W	Have observations	5.1.22 – can ground floor flats be referenced in this section as well. Is it deemed	Acknowledged – important to include	Amended paragraph 5.1.22 to '*Single storey residential development and ground floor*

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Agency		SPD:95		acceptable to provide safe refuge in non-habitable areas like corridors?	ground floor flats here	*flats are generally more vulnerable to flood damage as occupants do not have the opportunity to retreat to higher floor levels and salvage belongings to higher ground. For this reason single storey housing and ground floor flats in flood risk areas should not be allowed unless finished floor levels are set above the appropriate flood level for the lifetime of the property (taking into account the appropriate climate change allowance), and there is safe access and escape. In areas of extensive floodplain (e.g. Wisbech), single storey housing could be supported where a purpose built stairway is provided to the roof area and escape from this area is in the form of easily accessible and easy to open roof light windows or similar (this must be as agreed by the relevant LPA in advance'.* Due to other changes this is now 5.1.28
Adam Ireland Environment Agency	5.1.23	F+W SPD:96	Have observations	5.1.23 – unless FFLs are raised or can be raised?	Acknowledged – this should be updated in the SPD	Amended paragraph 5.1.23 to '*Sleeping accommodation on the ground floor that relies on flood warnings and the implementation of flood proofing measures is hazardous. Change of use from commercial to residential that results in proposed ground floor flats in Flood Zone 3 is unlikely to be acceptable (even with the use of flood proofing measures to mitigate the flood risk) unless finished floor levels are or can be raised above the predicted flood level (with an appropriate allowance for climate change), and there is safe access to and escape from higher storeys of the building'.* Due to other changes this is now 5.1.29

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Mr John Oldfield Bedford Group of IDBs	5.1.27	F+W SPD:62	Have observations	IDBs may also adopted new flood defences under Agreement and with funding	Acknowledged – this should be updated in the SPD	Added '*In addition, IDBs may also adopt new flood defences if appropriate agreements and funding are in place.'* To end of paragraph 5.1.27. Due to other changes this is now 5.1.33
Adam Ireland Environment Agency	5.1.27	F+W SPD:97	Have observations	5.1.27 – Defences are not there to allow for further development and therefore should not be agreed unless there is wider sustainability benefits. We would prefer that this position is made clear within this paragraph. This section should also look into designations under the FWM Act. Where a defence was being built to protect a development or area, this could be designated a 'flood asset' by the LLFA.	Acknowledge – this should be updated in the SPD	Paragraph 5.1.27 amended to '*The construction of new flood risk defences may enable development to take place provided that there are wider sustainability benefits associated with their construction (this could be demonstrated through a sustainability appraisal for example). Their construction needs to be very carefully considered with the LPA, the EA and the relevant IDB. New defences create new residual risks that can take significant investment to fully understand and plan. WMAs who maintain defences (such as the EA or IDBs) are not obliged to maintain defences and could potentially reprioritise or reduce expenditure in this area. Where defences are required, maintenance agreements will need to be reached through Section 106 of the Town and Country Planning Act 1990 or Section 30 of the Anglian Water Authority Act 1977. The latter can be used by the EA to adopt flood defences directly. In addition, IDBs may also adopt new flood defences if appropriate agreements and funding are in place'.* Due to other changes this is now 5.1.33 Additional paragraph (5.1.34) added in – *'Under the FWMA 2010, the EA, LLFA, District Councils and IDBs have legal powers to designate structures and features that affect flood risk and are not directly*

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						maintained by these organisations. Where a defence is being built to protect a development or area, it may be designated as a 'flood asset' by the relevant body. Further information on the designation of structures can be found in Defra's Designation of Structures and Features for Flood and Coastal Erosion Risk Management Purposes – Information Note.'
Adam Ireland Environment Agency	5.2.9	F+W SPD:110	Have observations	5.2.9 – Contradictory – what is best for flood depths between 0.3-0.6m? General – There are numerous illustrations sourced from other documents that aren't directly referenced. Check permissions to use these illustrations.	Acknowledged – the difference between 0.3 and 0.6 has been unintentionally missed out. This should be updated to include all depths up to 0.6 m (based on DCLG document).	Updated water exclusion strategy to '*Water exclusion strategy – where emphasis is placed on minimising water entry whilst maintaining structural integrity, and on using materials and construction techniques to facilitate drying and cleaning. This strategy is favoured when low flood water depths are involved (not more than 0.6m). It should be noted that even with this strategy, water is still likely to enter the property*' All illustrations now referenced appropriately
Adam Ireland Environment Agency	5.2.10	F+W SPD:111	Have observations	5.2.10 – if the text is taken directly from the guidance then why include it?	The text is not directly lifted and therefore the wording should be amended here to say 'further information can be found…'	Amended wording of paragraph 5.2.10 to '*Further details can be found in improving the Flood Performance of New Buildings (CLG, 2007)'*
Miss Kayleigh Wood Historic England	6 Surface Water and Sustainable Drainage Systems	F+W SPD:13	Object	Within the red summary box it states that Sustainable Drainage Systems will: 'Conserve, accommodate and enhance biodiversity'. However, it does not highlight the need to conserve or enhance the Historic Environment (which is covered within the Section at 6.2.8, 6.2.9, 6.3.18 and 6.3.19) and we would therefore advise that this is included within the red summary box.	Acknowledge – historic environment should be added in here	Third bullet point within box amended to '*Conserves, accommodates and enhances biodiversity and the historic environment; and'*

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Mr John Oldfield Bedford Group of IDBs	6 Surface Water and Sustainable Drainage Systems	F+W SPD:63	Have observations	An essential element of a SuDS is maintainability to ensure it continues to function effectively in the future.	No specific changes required; however additional detail on maintenance has been added throughout chapter due to changes made by newly published SuDS Manual	No change
Mr Graham Moore Middle Level Commissioners	6 Surface Water and Sustainable Drainage Systems	F+W SPD:144	Have observations	Our position on the use of SuDS is as follows: "National guidance promotes the management of water in a sustainable way to mimic the surface water flows from the site prior to development, thus discouraging the discharge of unregulated flows of surface water to sewers and watercourses. This, however, primarily refers to and presupposes the use of gravity systems which serve most of the country. Whilst the Commissioners and associated Boards generally support adherence to national guidance where appropriate this must, to a certain extent, depend on the individual circumstances of the site or receiving watercourse system. Unlike most of the country, the majority of Fenland is served by pumped, artificial drainage systems with low hydraulic gradients with any run-off generally being stored within them, often for a great length of time, before being discharged into the river system and thus reducing any impact on the peak flow within the river system.	Acknowledged – as outlined in previous comments, some acknowledgment of the differences in land types across the county (city to fen) should be made. Often it is perceived that SuDS cannot be used in fen areas; however this is not the case and therefore a paragraph relating to this should be added.	New paragraph (6.1.4) added in to represent different landscape of the Fens '*Even across man-made areas such as the Fens there is the potential to make use of many different SuDS components as they can reduce the immediate impact of intense rainfall ultimately having a cumulative beneficial effect on flood risk from main rivers. Together SuDS and IDB systems can be a strong combination providing significant benefits for future development*'

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				A major concern regarding the use of grey water recycling, infiltration devices, attenuation storage systems and other SuDS, although not necessarily our problem at this time, is the future funding and maintenance of such devices which, if unmaintained, can become a liability resulting in drainage/flooding problems which have to be resolved at a cost to the owner and possibly the public purse. The resolution of this issue, which was considered as part of the Pitt Review, is still awaited. It is considered that, in some circumstances, an unregulated flow in to the Board's managed system is the most appropriate long term solution. The associated contribution for making an unregulated direct discharge to the Board's system will ensure that it is maintained and continues to perform its function and provides the appropriate Standard of Protection (SoP) at relatively small cost and with minimal environmental impact reducing the need to utilise natural resources and the impact of climate change by reducing greenhouse gas emissions."		
Mr Richard Whelan	6.1.5	F+W SPD:37	Have observations	6.1.5 Mentions the NPPF, it would be worth making reference to the Planning Practice Guidance and the Non-Statutory Technical Standards at this stage as they are a good guide for LLFAs and developers, out in 6.8.1 later in the document.	Acknowledge – these need to be added in alongside local planning policies	Amended paragraph 6.1.5 to '*Please note that reference is made to 'SuDS' throughout this chapter, rather than 'surface water drainage' as the NPPF, NPPG, Non-Statutory Technical Standards for Sustainable Drainage and adopted and emerging Local Planning policies require a SuDS solution to surface water management*

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						for new development. Many of the general principles within this chapter can also be applied to traditional surface water drainage and so this chapter needs to be complied with on all development sites and the provision of SuDS maximised. Even on very constrained sites SuDS can be implemented in one form or another'. Due to other changes this is now 6.1.6
Mrs Ellie Henderson	6.2.2	F+W SPD:31	Object	We would wish to note the following point: Trees can reduce the impact of drought as, under the right conditions, shelterbelts can enable crops to use water more efficiently which could reduce the need for irrigation and lead to less abstraction. A joint Environment Agency/Forestry Commission publication ***Woodland for Water: Woodland measures for meeting Water Framework objectives*** states clearly that: *'There is strong evidence to support woodland creation in appropriate locations to achieve water management and water quality objectives'* (Environment Agency, July 2011- http://www.forestry.gov.uk/fr/woodlandforwater). Therefore we would like to see mention here of the value of trees and woodlands in this regard.	Acknowledge – add into SPD	Added '*Equally, trees and woodland, where used appropriately can reduce the impact of drought as, under the right conditions, shelterbelts can enable crops to use water more efficiently (by reducing evapotranspiration losses) which could reduce the need for irrigation and lead to less abstraction'* to paragraph 6.2.2.
Mr John Oldfield Bedford Group	6.2.6	F+W SPD:64	Have observations	The section should emphasize the need to design biodiversity into the SuDS so that the SuDS can function in the future to manage flood risk, and hence avoid unnecessary	Acknowledge – add into SPD	Amended wording of paragraph 6.2.6 to '*Many of Cambridgeshire's nationally and locally designated nature conservation areas are designated because of their water*

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of IDBs				conflict over maintenance and the risk of disturbing protected species.		*environment. The integration of SuDS into the landscape needs to be sensitive to the local biodiversity and equally, biodiversity needs to be designed into SuDS. At present one of the main risks to biodiversity in Cambridgeshire is the extent of fragmentation of habitats and loss of species due to historical farming practices and more recently increased pressures from development. Inclusion of SuDS networks could help to re-connect existing habitats and re-create new areas. Cambridgeshire's Habitat Action Plans and Species Action Plans provide specific information on desirable habitat design in the county. Biodiversity should be integrated into SuDS at the early design stage to avoid unnecessary conflict over maintenance and the disturbance of protected species. Additionally if protected species are likely to be attracted to SuDS features, the protection of these habitats during maintenance and operation should be considered in the design'*
Mrs Ellie Henderson	6.2.7	F+W SPD:32	Object	We would wish to see mention of woodland creation here. We believe that woodland creation is especially important because of the unique ability of woodland to deliver across a wide range of benefits – see our publication ***Woodland Creation – why it matters*** (http://www.woodlandtrust.org.uk/en/about-us/publications/Pages/ours.aspx). These include for both landscape and biodiversity (helping habitats become more robust to adapt to climate change, buffering and extending fragmented ancient woodland), for	Acknowledge – add into SPD	Amended wording of paragraph 6.2.7 to '*A UK government objective is, "connecting people with nature" (Defra 2011) and the use of SuDS can help deliver this objective. Through careful design, SuDS can respect, enhance and connect local habitats and support biodiversity and green infrastructure in Cambridgeshire. As recognised in the CIRIA SuDS Manual (C753), water within a SuDS system is essential for the growth and development of plants and animals and biodiversity value can be delivered on any scheme from small, isolated systems to*

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				quality of life and climate change (amenity & recreation, public health, flood amelioration, urban cooling) and for the local economy (timber and woodfuel markets). **Government response to Independent Panel on Forestry Report (January 2013):** We want to see significantly more woodland in England. We believe that in many, although not all, landscapes more trees will deliver increased environmental, social and economic benefits. We particularly want to see more trees and woodlands in and around our towns and cities and where they can safeguard clean water, help manage flood risk or improve biodiversity.		*large strategic developments where SuDS are planes as part of the wider green landscapes. The creation of rough grasslands, woodland, wetland meadows, aquatic planting and open water can provide shelter, food and foraging and breeding opportunities for a wide variety of wildlife'*
Miss Kayleigh Wood Historic England	6.2.8	F+W SPD:14	Support	Accommodating measures such as Sustainable Drainage Systems, whilst sustaining and enhancing the character of historic townscapes and landscapes, is an area which should be explored and it is appreciated that this is covered at points 6.2.8 and 6.2.9 and this is welcomed.	Support noted	No change
Mrs Ellie Henderson	6.2.13	F+W SPD:33	Object	We would like to see mention of trees here. The Forestry Commission's publication, *The **Case for Trees in development and the urban environment*** (Forestry Commission, July 2010), explains how: *'the capacity of trees to attenuate water flow reduces the impact of heavy rain and floods and can improve the effectiveness of Sustainable Urban Drainage Systems'.* Trees can help reduce mitigate surface	Acknowledge – reference to trees should be made where possible throughout document	Trees additionally referred to elsewhere throughout document (paragraph 5.1.14 and 6.2.2)

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				water flooding in urban situations too, when rain water overwhelms the local drainage system, by regulating the rate at which rainfall reaches the ground and contributes to run off. Slowing the flow increases the possibility of infiltration and the ability of engineered drains to take away any excess water. This is particularly the case with large crowned trees. Research by the University of Manchester suggests that increasing tree cover in urban areas by 10% can reduce surface water run-off by almost 6%. Trees are therefore a useful component of Sustainable Urban Drainage Systems (SuDS). The Woodland Trust has produced a policy paper illustrating the benefits of trees for urban flooding – ***Trees in Our Towns – the role of trees and woods in managing urban water quality and quantity*** - https://www.woodlandtrust.org.uk/publications/2012/12/trees-in-our-towns/ .		
Scott Hardy RSPB	6.2.13	F+W SPD:136	Have observations	The SPD introduces the potential of SuDS to provide valuable habitat and to contribute to strong green infrastructure networks with increased benefits for biodiversity. It advises ' *that there are several Biodiversity Action Plan species and habitats that can be supported by well designed SuDS'*, and that SuDs can '*enhance and connect local habitats*' and '*provide an opportunity to replace some of* [Cambridgeshire's] *lost*		Added paragraph (6.2.8) to Biodiversity and Green Infrastructure section (moved to remove duplication throughout chapter). '*There are several Biodiversity Action Plan (BAP) species and habitats*[2] *that can be supported by well-designed SuDS. In appropriate locations, design of retention ponds and wetlands should consider the integration of well-designed sanctuary areas wherever possible, to give spaces for the more sensitive wildlife species. To make sure SuDS can provide the best benefits to*

[2] Updates to Biodiversity Action Plans can be found here: www.cpbiodiversity.org.uk

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				landscape and habitats'. The RSPB strongly supports the adoption of a landscape-led approach to SuDS planning and the creation of locally appropriate habitats through SuDS, and are pleased to see this promoted within the SPD. However, in order to fully achieve this through SuDS, appropriate ecological expertise and engagement with local stakeholders is required. Currently the SPD states in point 6.2.13 that ' *designing SuDS effectively requires the right team with the relevant skills'*. The RSPB strongly recommends the SPD expands on this statement to ensure the importance of ecological expertise and stakeholder input is fully understood. Expert ecological advice will also allow SuDS to provide maximum benefit for protected species and other species of conservation concern which may already be present on site. A list of useful contacts is contained within the RSPB and WWT SuDS guidance booklet1, and could help inform developers of the potential stakeholders and experts to engage with. For example, paragraph 6.2.13 could be expanded to describe: "*designing SuDS effectively requires the right team with the relevant skills. To make sure SuDS can provide the best benefits to wildlife ecological expertise is strongly advised. Consultation with nature conservation groups can also help access such expertise. Further information and a list*		*wildlife, ecological expertise is strongly advised. Consultation with nature conservation groups can also help access such expertise. Further information and a list of useful contacts can be found in the RSBP and WWT publication 'Sustainable Drainage Systems: Maximising the Potential for People and Wildlife'*

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				of useful contacts is contained within the RSPB and WWT SuDS guidance booklet1"		
Mr Richard Whelan	Figure 6.1: Stage 1	F+W SPD:45	Support	This is a good representation of SuDS design, illustrating how early consideration of the drainage avoids expensive retrofit solutions on established plans	Support noted	No change
Mr Richard Whelan	6.3.4	F+W SPD:44	Have observations	Where the receiving water body allows reduced attenuation onsite it could be worth adding a design requirement that it must be demonstrated that the site is able to drain when the receiving waterbody is already in a 1% flow event. This helps to ensure that the experiences of 1998 are not revisited (where flooding was experienced when watercourses and sewers had difficulty in discharging due to an already high water level in the receiving watercourse)	Acknowledge – it is important to look at how the site will drain in flood conditions and an appropriate wording should be added in to reflect this.	Amended wording of paragraph 6.3.4 to '*The LPA may allow a reduced level of attenuation prior to discharge to a watercourse where a strategy or study undertaken by or in partnership with an IDB or other WMA demonstrates that no increase in flood risk would occur to the site or elsewhere. It must however be demonstrated by the applicant that the site can continue to drain when receiving water bodies are in flood conditions. Irrespective of any agreed runoff rates, source control methods must be implemented across sites to provide effective pre-treatment of surface water. This must be demonstrated as part of the proposal*'
Mr John Oldfield Bedford Group of IDBs	6.3.6	F+W SPD:65	Have observations	The section should include a figure to represent bespoke areas of Cambridgeshire, namely the heavily modified and artificial watercourses, which are equally as important as natural and urban examples.	Although Heavily Modified Waterbodies relate to the WFD it would be useful to include maps of these watercourses across the county. These need to be obtained from the EA's geostore and included as a figure within the text.	Added new paragraph (6.3.10), *'In addition to natural and urban catchments, as already detailed, the Fen area of Cambridgeshire has an extensive network of artificial drainage channels that are mostly pump drained. The majority of these are under the control and management of IDBs.* Map 6.1 *shows those areas of Cambridgeshire where the watercourse are designated by the EA as 'Heavily Modified Waterbodies' and 'Artificial Waterbodies'. Such designation relates to the Water Framework Directive*

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						(see Chapter 7 for further information); however it provides a useful visualisation of the artificial drainage network across Cambridgeshire' Also added plan of HMWB across Cambridgeshire (Figure 6-1)
Scott Hardy RSPB	6.3.10	F+W SPD:137	Have observations	Point 6.3.10 of the SPD advises '*When designing SuDS networks on land that has low permeability, SuDS should be designed accordingly. Soakaways and other infiltration methods may not be suitable but there are many other methods that can be used on clay type soils*'. The RSPB are aware that clay type soils have previously been cited as a barrier to SuDS inclusion within development plans. We are pleased to see the SPD advise that there are '*many other* [SuDS] *methods that can be used on clay type soils*'. However, we would like to see this point strengthened given that clay soils have been viewed as a barrier to SuDS previously. It is our view that where clay soils are present there should be potential to provide even greater scope and opportunity for wildlife over free draining sites through SuDS. Clay soils have great potential for nature rich surface features such as swales, rills, retention basins, ponds, and wetlands	Acknowledged – impermeable soils often cited as a barrier and appropriate wording should be added in to reinforce this will not be acceptable as a reason across Cambridgeshire	Following sentence added into 'keep water on the surface' '*Low permeability soils are often cited as a reason for not including SuDS; however this is not acceptable in Cambridgeshire as solutions do exist. Although soakaways and other infiltration methods may not be suitable, many other methods such as swales, ponds and wetlands should be prioritised,*' Due to other changes this is now 6.3.22
Mr Richard Whelan	6.3.11	F+W SPD:46	Have observations	This paragraph seems to aimed at setting out the consideration of infiltration but hints at SuDS as being primarily infiltration devices which is in conflict with what is described in 6.3.10. SuDS mimic natural	This is already covered throughout the SPD and 6.3.22	No change

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				drainage as described earlier in the document and with less permeable soils natural drainage would be a process of limited infiltration and overland flow through streams and rivers etc. Might I suggest amending this to say that ground conditions will influence the type of SuDS system being considered or remove the reference from SuDS from this paragraph and focus purely on infiltration, regardless of how that is achieved?		
Miss Kayleigh Wood Historic England	6.3.18	F+W SPD:15	Support	Accommodating measures such as Sustainable Drainage Systems, whilst sustaining and enhancing the significance of areas of archaeological interest and or potential interest, is an area which should be explored and it is appreciated that this is covered at points 6.3.18 and 6.3.19 and this is welcomed.	Support noted	No change
Mr John Oldfield Bedford Group of IDB	6.3.24	F+W SPD:66	Have observations	These areas may be subject Byelaws and specific restrictions, such as no development or obstruction.	Reference can be added in to byelaws	Amended paragraph 6.3.24 to '*Consideration should be given to access to, and maintenance of, existing infrastructure which includes existing watercourses. Many IDBs, Local Authorities and the EA have requirements and/or byelaws requiring maintenance strips adjacent to a watercourse and should be contacted for exact requirements in their area*'. Due to other changes this is now 6.3.34
Mr Richard Whelan	6.3.25	F+W SPD:43	Have observations	Pleased to see mention of how SuDS does not always mean infiltration. The document almost requires a myth busting page as a pre-emptive approach to standard rejections of Sustainable Drainage Systems. There	This is acknowledged and has been covered by additions made in response to other representations.	No change

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				are still some strange widely held opinions that a SuDS system can only be used on certain sites. As you will know, ultimately any system that is not inspected, maintained or designed with site constraints and long term flood risk in mind will be unsustainable. Hence moving the focus onto ownership and adoption		
Mrs Ellie Henderson	6.3.27	F+W SPD:34	Object	We would like to see woodland mentioned here as it is mulit-functional, delivering a wide range of benefits including - helping habitats become more robust to adapt to climate change, amenity & recreation, improving air quality, flood amelioration, urban cooling and for the local economy (timber and woodfuel markets).	Acknowledged – can add woodland in	Wording amended to '*Open spaces are an asset to the community and to the environment and form an important component of a wider green infrastructure network. A network of woodland, recreational and open spaces, whether green or paved will be essential for well-designed developments. Open spaces can provide space for SuDS features to provide attenuation and treatment of surface water runoff. Good design will seek ways to integrate SuDS with the rest of the open space and to make SuDS features multifunctional. In these areas there is a need to concentrate on design and amenity value, recreational use, and fit with surrounding landscape (see figure 6-9) Examples of multi-functional uses in open spaces include; temporary storage areas doubling as playing fields or recreation areas, hardscape attenuation doubling as water features and public art, bioretention areas doubling as landscaped garden areas, wetlands and ponds doubling as amenity and habitat areas, and bioretention planters linking with open space divisions or seating areas'.* Due to other changes this is now

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						6.3.38
Scott Hardy RSPB	6.3.27	F+W SPD:138	Have observations	The RSPB is pleased that the SPD promotes the use of SuDS in multi-functional landscapes to enhance urban, recreational, and open spaces. As recognised in the SPD this provides benefits for the local communities, including access to nature. However the RSPB does not consider the SPD provides sufficient guidance on encouraging community engagement and ownership of SuDS. The RSPB strongly recommend including additional information on community engagement and partnership working. With good design and an effective participation strategy, as well as expert ecological guidance, SuDS (particularly those that provide wildlife habitat and so an attractive feature) can readily become a focus of community life, where people are willing to get involved with local activities. The appropriate management of SuDS can provide many opportunities for learning, informal recreation, supported play and other community programmes. This has many social and health benefits and gives people a sense of pride, responsibility and ownership of their environment. Active interpretation, volunteering opportunities, guided walks and other forms of engagement provide ways in which people can become involved in decision-making and management of SuDS. This in turn can engender public support for SuDS, leading to increased awareness of wetlands and the natural environment and community	Detail on pre-app working with relevant WMAs etc has been included throughout and there is a lot of information in Section 6 on how to most appropriate include SuDS therefore no additional changes proposed in response to this comment.	No change

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				cohesion.		
Mrs Helen Lack Huntingdonshire District Council	6.3.28	F+W SPD:5	Have observations	Please note that HDC's Design Guide states at 3.4.3 page17, "It is not acceptable for areas intended as informal open space to : 1)be comprised mainly or wholly of land which doubles as a balancing area (which is likely to be unusable for at least part of the year...." 6.3.28 seems to conflict with this approach	Acknowledge that different LPAs will have different approaches. Appropriate wording should be used to ensure differences between LPAs are made clear	Paragraph 6.3.28 amended to '*Where the local authority will adopt SuDS in public open spaces, they must still be able to function and be accessible as useable open space for the majority of the time for them to be included within the open space calculations*'. Due to other changes this is now 6.3.39
Mr Richard Whelan	Figure 6.7 Street design to drain to adjoining lower ground SuDS feature (courtesy of CIRIA)	F+W SPD:50	Have observations	seems to show a traditional road and gully system when the water could be conveyed across the land illustrated, to the untrained eye this may appear fairly similar to the undesirable image in figure 6.12.	Updated images now obtained from Ciria which will be used throughout document	Updated
Mr Richard Whelan	6.3.31	F+W SPD:47	Have observations	It may be worth mentioning why the deep end of pipe assets are less desirable; increased excavation, potential need for unnecessary pumping or increased health and safety risk and mitigation requirements	Acknowledge – add in	Added '*Deep features are undesirable due to increased excavation, the potential need for unnecessary pumping and the requirement for mitigation measures'* to paragraph 6.3..31. Due to other changes this is now 6.3.43
Mr Richard Whelan	6.5.2	F+W SPD:48	Have observations	seems slightly simplistic, it could benefit from reference to Building Regulation requirements relating to separators/	Acknowledge. In addition, the Ciria SuDS manual has been updated and this section should therefore be	Section 6.5 now amended in relation to this comment and updates to the Ciria SuDS

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				interceptors and from a link to EA Pollution Prevention Guidance (https://www.gov.uk/government/collections/pollution-prevention-guidance-ppg). Also there should be consideration of the type of water quality risk and the type of treatment stages, for example trapped gullies, catch pit manholes and separators/ vortex devices are relatively ineffective against soluble or fine suspended pollutants such as milk or detergents.	updated to reflect both this comment and manual changes.	manual. 6.5.1 *'SuDS have a considerable advantage over traditional drainage as a well-designed system will provide a level of treatment to surface water runoff before it is discharged into the receiving water body. It does this through a number of processes including filtration, settlement, and uptake by plants.* *6.5.2The size and number of treatment stages required is based on the level of pollution entering into the system. For example, industrial sites will contain a higher level of pollutants within surface water runoff than from a small residential road.* Table 6-3 *indicates the water quality management design method/approach required to determine the appropriate level of treatment for a number of land uses.* *6.5.3Each treatment stage must be designed to be effective in pollutant removal as stipulated in The SuDS Manual C753). This needs to be quantified at the application stage. Different features have different levels of effectiveness and the system should be designed as a whole to ensure there is no detriment in water quality.* *6.5.4 Guidance on the effectiveness and design of each potential feature can be found in* Table 6-3 *Guidance notes for* Table 6-3 *can be found in Appendix 5.'*
Mr Richard Whelan	6.5.4	F+W SPD:49	Have observations	The CIRIA SuDS Manual is due to be re-released this year under a different reference (i.e. not C697) would suggest making reference to the latest CIRIA guidance to avoid references to out dated documents (this is repeated in the	See comments and action above (F&W SPD:48)	No change

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				document)		
Harry Jones of David Lock Associates for Tim Leathes Urban and Civic	6.6 Designing a safe environment	F+W SPD:148	Have observations	Detailed SuDS Design Section 6.6 of the draft SPD outlines that all SuDS schemes should be designed as a safe environment that can be accessed and enjoyed by residents and visitors. Paragraph 6.6.1 is clear that the use of fencing and barriers should not be the approach to making SuDS features safe. Whilst U&C agrees that it is not appropriate to include the fencing and barriers as part of the design of SuDS features in residential areas, the use of such features and steeper earthworks slopes may be acceptable in less sensitive environments such as for employment sites. In this context, it is suggested that paragraph 6.6.1 is amended to introduce more flexibility to allow the use of fencing, barriers and steeper earthworks slopes where appropriate within the landscape of less sensitive developments. U&C welcome the clarification within section 6 of the draft SPD that the provision of SuDS within development projects is the preferred approach for the design of water drainage systems in Cambridgeshire rather than traditional surface water drainage systems. This clarity will ensure that SuDS can be incorporated into the design of development proposals at the outset in order to maximise their efficiency and amenity value. The approach to SuDS design outlined within paragraph 6.6.1 highlights the opportunity to incorporate SuDS within	Acknowledge – wording relating to the safety/use of fencing for SuDS should be added to this section.	Paragraph 6.6.1 amended to '*All SuDS schemes should be designed as a safe environment that can be accessed and enjoyed by residents and visitors. The use of fencing and barriers should not be the approach to making SuDS features safe, particularly in residential developments. It is however recognised that there may be cases in less sensitive environments (such as industrial areas) where steeper earthworks and safety measures are appropriate'*

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				formal public open space within development sites. U&C agree that well designed SuDS within safe environment can be a valuable amenity asset for local communities.		
Mr John Oldfield Bedford Group of IDBs	6.7 Developing a surface water drainage strategy	F+W SPD:67	Have observations	This whole section should have an overarching message that it is essential to consider maintenance at each stage of master planning.	Acknowledge – this is also reinforced by the NPPF which requires maintenance to be considered as part of a planning application. Appropriate wording should be added in.	Paragraph 6.7.1 amended to '*For larger developments a masterplan will be necessary. It is at this stage the SuDS layout (taking into account flow routes, topography, geology and green space) and proposed maintenance of the system should be determined whilst, ensuring a safe design and mitigation of flood risk (see* Figure 6.1*). Seeking advice at the earliest opportunity from the relevant WMAs will help avoid any costly issues or redesigns at a later stage. Effective master planning should ensure a robust, viable and cost-effective scheme from the outset, where objectives of the development are informed by the SuDS scheme and vice versa'.* 7th bullet point of paragraph 6.7.5 amended to, '*Maintenance and management plan of surface water drainage system (for the lifetime of the development) including details of future adoption*'
Mr and Mrs P Boon	6.9 Adoption and Maintenance of SuDS	F+W SPD:4	Have observations	I have read the document and think if it is enforced it could be a very good framework for agencies and developers to follow. Paragraph 6.9 Adoption and Maintenance of SuDS. This section covers the maintenance and adoption of SuDS. In my experience of local developments this is not sorted out, this should be a precondition and enforced. If the	Support noted	No change

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				SuDS for a development is not maintained then this could either cause flooding on the site or surrounding properties or the local authorities becoming responsible for maintenance and funding.		
Mr John Oldfield Bedford Group of IDBs	6.9.1	F+W SPD:68	Support	We support the benefits of the SuDS being adopted by a statutory body for the future maintenance, as this ensures there is an accountable body in the future to undertake maintenance. It also enables the developers to concentrate on their main priority of building houses and buildings.	Support noted	No change
Harry Jones of David Lock Associates for Tim Leathes Urban and Civic	6.9.1	F+W SPD:149	Have observations	Adoption and Maintenance of SuDS U&C agrees with the recommendation outlined at paragraph 6.9.1 that it would be preferable for a statutory organisation to take on the role of maintaining SuDS within developments. However, clarification is required to confirm that this is not the only approach which could be acceptable depending upon the circumstances of specific developments. For example, in some circumstances, it may be more appropriate that the long-term management of SuDS is undertaken by a management company or private owner.	Acknowledged – appropriate maintenance/adoption of SuDS will be considered by the LLFA. Amendment should be made to this effect.	Paragraph 6.9.1 amended to '*The LPA may seek advice for developers looking to source an appropriate body for SuDS adoption and maintenance. It is recommended that a statutory organisation takes on the role of maintaining the SuDS as this will guarantee maintenance of the drainage system in perpetuity; however where this is not possible ,alternative bodies may also be able to maintain SuDS, provided that a suitable maintenance plan has been submitted to and agreed with the LPA. Statutory organisations in Cambridgeshire may include organisations such as the local authorities, Anglian Water and IDBs. For SuDS serving the highway these should be discussed with the Highways Authority at CCC to ensure suitability for adoption*.'
Scott Hardy RSPB	6.9.3	F+W SPD:139	Have observations	The SPD advises under point 6.9.3 that '*there is a need to ensure that a long-term, effective maintenance regime is in place*'. However, whilst the SPD states under 6.3.20	Acknowledged – appropriate wording relating to habitat management plans should be added	Third bullet point of 6.9.3 amended to '*There is a need to ensure that a long-term, effective maintenance regime is in place along with a long term habitat management*

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				that '*if protected species are likely to be attracted to SuDS features, the protection of these habitats during maintenance and operation should be considered in the design*', it does not specify the need for a long term habitat management plan. The RSPB strongly recommends that the SPD confirms the need for a long term habitat management plan to be developed to inform any maintenance regime put in place to ensure the system functions effectively over time and continues to provide benefits to wildlife. Any habitat management plan should ensure key species continue to benefit from a SuDS scheme, as well as ensuring water storage and water filtration (to improve discharge quality) functions do not diminish. The RSPB strongly recommend that the role of source control within SuDS systems be expanded upon within the SPD to highlight the importance of adequate source control (e.g. green roofs, living walls, rain gardens, permeable surfaces, filter strips and bio-retention areas) for delivering SuDS with high wildlife and amenity value. The most important component of SuDS if they are to deliver for wildlife is source control. Poor water quality reduces the likelihood of creating valuable wildlife habitats. The more effort invested in features at the point at which rain lands the better the regional control of detention and retention basins will be for wildlife. Further information on this can be found on pages 15-21 of the	in	*plan where appropriate*'. Amended paragraph 6.3.11 to '*The SuDS management train is a central design concept for SuDS. It describes the use of a, "sequence of components that collectively provide the necessary processes to control the frequency of runoff, the flow rates and the volumes of runoff, and to reduce the concentrations of contaminants to acceptable levels" (CIRIA 2015). The management train begins with land use decisions and prevention measures, followed by interventions at the property scale and street scale (source control), through to considerations for downstream run-off controls within the overall site boundary, and wider initiatives downstream that are designed to manage the overall catchment. Source control includes features such as permeable paving, rainwater harvesting, living walls, rain gardens, filter strips, green roofs and bio retention areas. These allow water to penetrate the feature thereby reducing the proportion of surface water runoff that is conveyed into the drainage system*'

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				aforementioned guidance 1, which we consider would provide helpful guidance if referenced and/or quoted in this section. SuDS often have cost benefits in comparison to traditional pipe drainage systems. These benefits have been widely reported, including in the 'Lamb Drove Sustainable Drainage Systems (SuDS) Monitoring Project' report commissioned by Cambridgeshire County Council. This report states that the capital costs of the SuDS scheme were £314 per property cheaper than the alternative pipe drainage system. It is the RSPB's view that the SPD does not adequately promote the potential cost benefits of multi-functional SuDS compared to traditional piped drainage systems. The RSPB recommends that the SPD strongly emphasises the potential cost benefits as this is likely to be a major consideration for developers. The RSPB's has previously worked with Exeter City Council on their 'Residential Design' SPD by providing biodiversity advice which is incorporated into the SPD. The RSPB is also cited as an additional source of information within this document. The RSPB recommends including a link within the Flood and Water SPD to our 'Sustainable Drainage Systems - maximising the potential for people and wildlife' guidance booklet,		

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				produced in partnership with the WWT1. The RSPB recommends the inclusion of a link to this SuDS guidance in the SPD to complete the portfolio of best practice guidance documents. It is our view that this will provide useful additional information and guidance for LPAs and developers regarding maximising the benefits of SuDS systems for people and wildlife. 1RSPB/WWT (2014). Sustainable Drainage Systems - maximising the potential for people and wildlife. At: www.rspb.org.uk/forprofessionals/policy/sustainabledevelopment		
Allan Simpson Anglian Water Services Ltd	6.9.5	F+W SPD:132	Have observations	Para 6.9.5 We recommend that this paragraph is amended to: "If the applicant is minded to choose Anglian Water as the appropriate body for SuDS adoption they should ensure the proposed design meets Anglian Water's adoption criteria, referencing relevant guidance and advice where appropriate. Further information on Anglian Water SuDS adoption, including the SuDS adoption manual, is available on the Anglian Water website."	Acknowledged – to be added to SPD	Amended paragraph 6.9.5 to '*If the applicant is minded to choose Anglian Water as the appropriate body for SuDS adoption they should ensure the proposed design meets Anglian Water's adoption criteria, referencing relevant guidance and advice where appropriate. Further guidance on Anglian Water SuDS adoption (including their Sustainable Drainage Systems Adoption Manual) is available on the Anglian Water website*'
Mrs Helen Lack	6.9.6	F+W	Have	Is it the intention that the document will include a schedule of adoption rates,	No this will not be included within the SPD, particularly as they would be	No change

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Huntingdonshire District Council		SPD:6	observations	supported by all Councils?	subject to change on a potentially frequent basis	
Mr Richard Whelan	7 Water Environment	F+W SPD:38	Have observations	Pleased to see the inclusion of compliance with the Water Framework Directive within the document (step 6 page 32 etc), however it should be noted that virtually all developments will have some level of WFD impact if the water eventually ends up in a WFD assessed waterbody (via a sewer or ground water flow), this may not cause the rivers to fail to meet WFD requirements instantly but the accumulative impact of development will increase the baseline contaminants within the water network and lead to a deterioration in the environment or a failure of compliance through accumulative inputs. Hence the need to ensure appropriate treatment stages are in place.	Support noted	No change
Adam Ireland Environment Agency	7 Water Environment	F+W SPD:98	Support	**Chapter 7: Summary** We generally support this section as capturing the general thrust of the WFD and how it relates to the planning system with planning applications. We realize that we did not provide detailed comments during previous formative drafts due to time and resource constraints at that time, so as agreed we include these now as mainly 'editing' suggestions for accuracy and by way of update.	Support noted	No change
Mr John Oldfield Bedford Group	7.1.1	F+W SPD:69	Object	This statement is incorrect in East of England, as a large proportion of our	Acknowledged – wording needs to be appropriately changed to reflect	Paragraph 7.1.1 amended to '*The European WFD is an established legal framework for*

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of IDBs				waterbodies are artificial or heavily modified for agriculture, development, milling, navigation, infrastruture..... Hence, any WFD statement should refer to **good ecological potential**	natural and modified water bodies.	*managing the water environment. Under the WFD the United Kingdom must aim to achieve 'good ecological status/potential' (depending on the designation of the water body) by 2015 in all surface freshwater bodies, including rivers, lakes, groundwater, transitional and coastal waters regardless of size and characteristics. Other objectives of the WFD include preventing deterioration of the status of all bodies of surface water, including groundwater*'.
Adam Ireland Environment Agency	7.2.1	F+W SPD:99	Have observations	7.2.1 the second ARBMP will be adopted December 2015 by the time the SPD is adopted. There EU legislation allows no scope for this to slip.	Acknowledge – amend wording of SPD appropriately	Paragraph 7.2.1 amended to '*River Basin Management Plans produced by the EA, in consultation with the LPA, detail the pressures facing the water environment and what actions need to be taken in order for the WFD to be met in each area. The Anglian River Basin Management Plan (December 2015) covers Cambridgeshire'*
Adam Ireland Environment Agency	7.3.2	F+W SPD:100	Have observations	7.3.2 Should submit a preliminary Water Framework Assessment and also consult the LLFA or LA depending on the waterbody, or if SuDS is a factor. 7.3.2 In most case the EA can "inform/advise" is more accurate than "confirm".	Wording currently states that a separate assessment may be required therefore this is already covered	No change
Adam Ireland Environment Agency	7.3.3	F+W SPD:101	Have observations	7.3.3 Last sentence accuracy :" In most cases EA can confirm <u>which process regulation</u> WFD assessment might be most appropriate to be undertaken <u>and whether there may be any in principle planning implications from WFD water body</u>	Acknowledge – amend wording of SPD appropriately.	Paragraph 7.3.3 amended to '*There may be proposals that do not need EIA but have potential WFD-related impacts for example marinas, development in close proximity to a river bank, channel diversions, new culverts on main rivers, mineral extraction close to watercourses or intensive agriculture. In*

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				objectives being met."		*most cases the EA can advise which process regulation WFD assessment might be most appropriate to be undertaken and whether there may be any in principle planning implications from WFD water body objectives being met'*.
Adam Ireland Environment Agency	7.3.4	F+W SPD:102	Have observations	7.3.4 EA deals with permits under a much wider range of legislation. Suggest we omit 'Water resources Act' and replace with: "a breadth of Environmental Permitting, Land Drainage, Water Resources and Pollution Prevention acts and regulations. Developers should seek to ascertain through pre-application discussions with EA what regulations are involved and whether these might involve controls that would mean a planning permission could not be implemented. The risk of not doing so is that it may make planning process an abortive one for all concerned and is likely in any event to involve a detailed water framework assessment at the planning stage."	Acknowledge – amend wording of SPD appropriately	Paragraph amended to '*WFD Assessments are sometimes required by the EA for developments where permissions are required for works near/on main rivers under the breadth of Environmental Permitting, Land Drainage, Water Resources and Pollution Prevention Acts and Regulations. Developers should seek to ascertain through pre-application discussions with the EA what regulations are involved and whether these might involve controls that would mean a planning permission could not be implemented. The risk of not doing so is that it may make the planning process an abortive one for all concerned and is likely in any event to involve a detailed WFD assessment at the planning stage'*.
Adam Ireland Environment Agency	7.3.7	F+W SPD:103	Have observations	7.3.7. Add 'Water companies can also provide up to date information and guidance' for completeness and getting up to date information.	Acknowledge – amend wording of SPD appropriately	Amended paragraph 7.3.7 to '*Another source of information leading on from the WFD is Water Cycle Studies (WCS). The WCS assesses the capacities of water bodies and water related infrastructure to accommodate future development and growth throughout Cambridgeshire, for each of the City and District Councils, and is intended to support the evidence base for their relevant Local Plans. Water companies can also provide up to date information and guidance relating to the available capacity of water and water recycling infrastructure as*

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						part of their pre-planning services'
Mr Graham Moore Middle Level Commissioners	7.4 Water resources and waste water	F+W SPD:145	Have observations	We are disappointed that given the title of the document that all water cycle issues such as water resources were not more fully considered. Within the document water resource issues predominantly refer solely to potable water supply but other water resource issues which exist within the study area, for example, agricultural use, navigation, amenity, biodiversity should also be considered, particularly if drought conditions, like those recently experienced, become more regular, if the impact of climate change becomes a reality. The largest development within the County during the current plan period and beyond is the Great Fen Project. The impact on the water cycle within the Commissioners' area may be beneficial, by providing flood protection, amenity, biodiversity benefits and/or detrimental by requiring high levels of abstraction when water is scarce. It should be remembered that with the exception of rain falling on the catchment, the Commissioners only source of water is the abstraction from the Back River, a tributary of the River Nene, through Stanground Lock. During periods of dry weather this abstraction from the Nene is reduced or ceases and this can detrimentally affect the Commissioners' system. The Nene system also serves Anglian Water's potable water storage reservoirs. Due to the statutory requirement within the	Previous actions have added in additional references to Fenland and differences between landscapes across the county. However additional wording could be added in. This would be more appropriate in Section 6 where the Cambridgeshire context is discussed	Previous actions have added in additional references to Fenland. Paragraph 6.2.2 amended to included reference to irrigation. *'Cambridgeshire is one of the driest counties in the UK. On average, the county receives less than 600 mm of rainfall per annum; however, this can drop below 500mm in particularly dry years. This is less than half the national average of 1,176mm. Accordingly, water management is an important issue and source control measures like rainwater harvesting that enable water use reduction locally are important along with retention of water for irrigation purposes. Equally, in some areas infiltration to re-charge local groundwater supplies is important due to the low rainfall conditions in Cambridgeshire and SuDS such as soakaways can help by encouraging infiltration wherever it is achievable and acceptable. In Fen areas where water levels are closely managed to sustain development and agriculture, the IDBs can use their systems to manage water supplies for agriculture. Equally, trees and woodland, where used appropriately can reduce the impact of drought as, under the right conditions, shelterbelts can enable crops to use water more efficiently (by reducing evapotranspiration losses) which could reduce the need for irrigation and lead to less abstraction'*

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				Middle Level System to maintain the navigation level which takes precedence over water abstraction if, during a long hot summer, there is any risk of dropping below the minimum navigation level, then all abstraction from our system will be curtailed or has to cease. This can last for potentially 4 – 6 weeks, which obviously has an impact on crop yields and could have an adverse impact on the Great Fen and other amenity, biodiversity sites. Whilst it is appreciated that agriculture, navigation and tourism are not likely to significantly impact on the larger "growth" issues, the study area is likely to remain primarily agriculturally based for the foreseeable future, and will therefore, create employment and contribute to the economy. Similarly, navigation and tourism do the same but on a much smaller scale and have sustainability and biodiversity benefits. The Middle Level Commissioners have to balance these against the need to retain both flows and a navigation level. Therefore, it is important that public water supply is balanced against these requirements; for example the supply of water from the River Nene to the Middle Level. These issues need to be taken into account including changes in upstream demand for waterbeyond the study area. The failure to consider this could have severe economic and environmental effects on the area that any growth in the Council's area may be affected.		

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Adam Ireland Environment Agency	7.4.1	F+W SPD:104	Have observations	7.4.1 For accuracy and completeness: future development 'have the potential to cause deterioration to the WFD status, the LPA and applicant will need to assess this and manage impacts accordingly to avoid any deterioration in line with Article 4.7 of the Directive. (NB we would not know if deterioration were likely until an assessment were carried out)	Acknowledged – amend wording of SPD appropriately	Paragraph 7.4.1 amended to *'If the water supply or wastewater discharge needs of any future development have the potential to cause deterioration to the WFD status, the LPA and applicant will need to assess this and manage the impacts accordingly to avoid any deterioration in line with Article 4.7 of the WFD'*
HarryJones of David Lock Associates for Tim Leathes Urban and Civic	7.4.1	F+W SPD:150	Have observations	Water Framework Directive Paragraph 7.4.1 confirms that where it is likely that water supply or wastewater discharge needs have potential to cause deterioration of the Water Framework Directive (WFD) status, this must be taken into consideration by applicants and local planning authorities. U&C suggests that this paragraph could be clarified to also include that consideration of the WFD is required to be considered in circumstances where the sewerage undertaker has confirmed that there is capacity in both the foul sewer network and at water recycling centres	This is not necessarily the case and could confuse matters if included	No change
Adam Ireland Environment Agency	7.4.2	F+W SPD:105	Have observations	7.4.2 at the end, for accuracy and update, add …water consumption "from all water resources in Cambridgeshire" in place of 'water stressed areas' which are anomalous for planning purposes.	Acknowledged – amend wording of SPD appropriately	Paragraph 7.4.2 amended to '*The supply of drinking water to Cambridgeshire involves abstraction from Water Resource Zones (WRZ) across the County and the wider area (Table 7-1). The resilience of the supply systems have the potential to be affected by the impact of climate change and severe*

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						weather related events. Both Cambridge Water and Anglian Water have encompassed the potential effects of climate change within their Water Resource Management Plans, which have determined the need for investment in both mitigation and adaptation, specifically to reduce water consumption from all water resources in Cambridgeshire'
Adam Ireland Environment Agency	7.4.3	F+W SPD:106	Have observations	7.4.3 Suggest moving this to before 7.5.1. Last line, update for accuracy and to accord with the ARBMP: Replace with "Increases to year round abstraction are unlikely to be permitted by the EA."	Acknowledged – amend wording of SPD appropriately	Change made and additional text added to paragraph 7.5.1 – amended to '*When water is removed from a river it can reduce water quality due to reduced dilution of pollutants. Standards are in place between the EA and the relevant water company to ensure that most of the time water levels within the river are maintained at an appropriate level for fish and other wildlife. However, in drought periods or with increasing demand water companies may need to apply for a permit to increase abstraction, and hence reduce river levels. Queries regarding increases to year round abstraction are unlikely to be permitted by the EA.*'
Adam Ireland Environment Agency	7.4.4	F+W SPD:107	Have observations	7.4.4 Update for accuracy and clarity of the process to avoid delays/uncertainty: delete 'it is likely that'. Last line "Details of works infrastructure in planned development locations can be found in the LPAs WCS and their update reviews. Proposal not accounted for in WCSs should be assessed in pre-application consultation with EA, AW/CWW. Proposals submitted without such info may experience delay or be determined as submitted."	Acknowledged – amend wording of SPD appropriately	Paragraph 7.4.4 amended to '*If the local water and sewerage company reaches a point where it needs to apply for a permit for increased discharge flows from a sewage treatment work (STW), water quality limits will be tightened. This is intended to aid achievement of the water quality objectives of the receiving water body under the WFD. Details of works infrastructure in planned development locations can be found in the LPA's WCS and their update reviews. Proposals not accounted for in WCSs should be assessed in pre-application consultation*

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						with the EA, Anglian Water/Cambridge Water'. Due to other changes this is now 7.4.3.
Mr George Dann King's Lynn Drainage Board	7.4.5	F+W SPD:124	Have observations	7.4.5 - this section is not particularly clear, and may benefit from being re-writtern. The requirement to obtain prior written consent for increases in the rate and/or volume of discharge in a watercourse in an IDB district, and to pay a fee for this, applies with most IDBs throughout the country, and certainly the vast majority, if not all, of the ones mentioned in your document, not just MLC.	Acknowledged and as previous comments have discussed, reference to MLC specific requirements have been removed throughout the report and have been generalised to all IDBs.	Paragraph 7.4.5 amended to *'Within most IDB areas, any additional discharges beyond those permitted into the IDBs systems will require their prior written consent together with the payment of the relevant fee'*
Mr John Oldfield Bedford Group of IDBs	7.5 Development location in relation to catchment or watercourse	F+W SPD:70	Have observations	For clarity, this section should refer to Byelaws and Consents.	Acknowledge – reference to byelaws should be added to paragraph 7.5.4	Amended paragraph 7.5.4 to '*Special consent may be required from Cambridgeshire's WMAs for development that takes place inside or within a certain distance of a non-main river watercourse. Developers should contact CCC (the LLFA) or IDB (If within an IDB's rateable area) for further details. Byelaws may also be applicable in some areas throughout Cambridgeshire. Check with the LPA/IDB if this is the case'.*
Adam Ireland Environment Agency	7.5.1	F+W SPD:108	Have observations	7.5.1 at the end add for accuracy and completeness environments..."or any modifications needed to facilitate improvement and not compromise the river's form and function".	Acknowledged – amend wording of SPD appropriately	Paragraph 7.5.2 amended to *'Under the WFD, a development's location within a catchment or its proximity to a watercourse is relevant. Proximity to a watercourse is relevant where, for example, development or engineering works could affect the ability of the body responsible for maintaining the watercourse to access, maintain or improve the water body, or where it could affect the flow in a watercourse. Riverside development must therefore be set back a reasonable distance from the water's edge,*

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						allowing a corridor between the two environments or any modifications needed to facilitate improvement and not compromise the river's form and function'.
Mr Graham Moore Middle Level Commissioners	Map 2.1: IDBs within East Cambridgeshire District Council (ECDC) Area	F+W SPD:142	Have observations	Unlike Maps 1.1, 3.1 and 3.2, the maps 2.1–2.4 included in Appendix 2 are of extremely poor quality. This is particularly disappointing given that a detailed plan showing both the Middle Level Commissioners' catchment, rivers and our pumping station at St Germans together with the drainage districts to whom we provide administrative, engineering and/or planning services and the LPA boundaries was sent to you in April.	This is agreed and relates to the space available on the host website for the draft SPD. Full resolution maps are to be used for final document.	Amended for final document
Miss Kayleigh Wood Historic England	Appendix 4: Building materials guidance	F+W SPD:16	Object	It should be acknowledged that the Building Material Guidance will not always be appropriate for Historic Buildings.	Acknowledged – a footnote to this effect should be added in	Included footnote '*Please note: Building Material Guidance will not always be appropriate for historic buildings*'
Adam Ireland Environment Agency	Glossary of terms	F+W SPD:109	Have observations	**Glossary:** Include 'ambient risk' in the glossary (from sequential test Stage D page 24). Suggest: "Ambient Risks: The pre-development risks of all forms of flooding with the presence of existing defences, including risks from defences being overwhelmed, or defence asset failure. Ambient risk does not include proposed site mitigation measures.	Unsure why this is required as ambient risk is not referred to in the SPD?	No change

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	Glossary of terms	F+W SPD:125	Have observations	Glossary - the definition of a "Hydrological Model" is much broader than this, and can apply to any watercourse, not just rivers.	Acknowledged and this should be changed	Amended to '*Estimates the flow in a river/watercourse from a given amount of rainfall falling into the catchment*'