Environment Agency

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Our ref: AC/2025/132677/01-L01
Your ref: 25/00413/FUL

Date: 14 April 2025

Dear Kevin,

DEMOLITION OF EXISTING HOUSE AND OUTBUILDINGS AND ERECTION OF FIVE DWELLINGS

190 HERNE ROAD RAMSEY ST MARYS HUNTINGDON PE26 2SY

Thank you for your consultation dated 25 March 2025. We have reviewed the documents as submitted and we are objecting to this planning application. Please find information on how to overcome our objection as well as further advice on Flood Risk in the sections below.

Non-Mains Foul Drainage

We object to the proposed development as submitted because it involves the use of a non-mains foul drainage system in circumstances where it may be reasonable for the development to be connected to a public sewer but no justification has been provided for the use of a non-mains system. We recommend that the application should be refused on this basis.

Reason

Private sewage treatment facilities should only be used where it is not reasonable for a development to be connected to a public sewer, because of the greater risk of failures leading to pollution of the water environment posed by private sewerage systems compared to public sewerage systems.

This objection is supported by planning practice guidance on non-mains drainage which advises that the first presumption must be to provide a system of foul drainage discharging into a public sewer (ref ID 34-020-20140306). Only where, having taken into account the cost and/or practicability, it can be shown to the satisfaction of the local planning authority that connection to a public sewer is not feasible, should non-mains foul sewage disposal solutions be considered.

Overcoming our objection

To overcome our objection the applicant should thoroughly investigate the possibility of connecting to the public foul sewer, and either revise their application to propose a

mains connection or submit evidence that demonstrates that this is not feasible.

Lack of capacity or plans to improve capacity in the sewer is not a valid reason for a development to install a private sewerage system. In such cases the developer should explore how a lack of capacity may be overcome so that their development can be connected to a public foul sewer. In these cases, if an applicant decides to apply for a water discharge permit for private treatment facilities, we are likely to refuse to grant the permit.

Flood Risk

We have reviewed the submitted Flood Risk Assessment (FRA) with regard to tidal and designated main river flood risk sources and consider that the site is at low risk of flooding from these sources.

We consider that the main source of flood risk at this site is associated with watercourses under the jurisdiction of the Internal Drainage Board (IDB). As such, the IDB should be consulted with regard to flood risk associated with watercourses under their jurisdiction and surface water drainage proposals.

In all circumstances where flood warning and evacuation are significant measures in contributing to managing flood risk, we expect local planning authorities to formally consider the emergency planning and rescue implications of new development in making their decisions.

Sequential Test

In accordance with the National Planning Policy Framework (paragraph 168), development should not be permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding. It is for the Local Planning Authority to determine if the sequential test has to be applied and whether or not there are other sites available at lower flood risk. Our flood risk standing advice reminds you of this and provides advice on how to apply the test.

Advice for the Applicant

Any proposed flood resilient measures should follow current Government Guidance. For more information on flood resilient measures, please see the Department for Communities and Local Government (DCLG) guidance document "Improving the Flood Performance of New Buildings – Flood Resilient Construction, 2007", which is available on the following website:
https://www.gov.uk/government/publications/flood-resilient-construction-of-new-buildings

The Environment Agency operates a flood warning system for existing properties currently at risk of flooding to enable householders to protect life or take action to

manage the effect of flooding on property. Receiving the flood warnings is free; you can choose to receive your flood warning as a telephone message, email, fax or text message. To register your contact details, please call Floodline on 0345 988 1188 or visit https://www.gov.uk/sign-up-for-flood-warnings.

Registration to receive flood warnings is not sufficient on its own to act as an evacuation plan. We are unable to comment on evacuation and rescue procedures for developments. Advice should be sought from the emergency services and the Local Authority's emergency planners when producing a flood evacuation plan.

Water Resources

The location of this development is in an area of serious water stress (as identified in our report Water stressed areas – 2021 classification) and has the potential to increase abstraction from groundwater sources. We therefore encourage all developments to be as water efficient as possible. This can be achieved through the following measures developments should meet a water efficiency target of 110l/h/d. We recommend this as a minimum, but strongly support going beyond this level. The Environment Agency and the WRMP also recommend the installation of smart meters and efficient fittings in new developments to assist meeting the water efficiency targets.

We trust that this advice is useful.

Yours sincerely,



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