

via e-mail

Sophie Mezzetti
Planning Services, Floor 1
Norfolk County Council
County Hall
Martineau Lane
Norwich
Norfolk
NR1 2SG

NCC contact number: 0344 800 8020
Textphone: 0344 800 8011

Your Ref: SCO/2024/0001
Date: 2nd May 2024

My Ref: FW2024_0303
Tel No.: 0344 800 8020
Email: llfa@norfolk.gov.uk

Case Officer: [REDACTED], Assistant Flood Risk Officer
Reviewed by: [REDACTED], Senior Flood Risk Officer

Dear Sophie,

Town and Country Planning (Development Management Procedure) (England) Order 2015

Request for EIA Scoping Opinion: Extension of quarry into MIN 200 Carbrooke Quarry, Carbrooke.

Thank you for your Scoping Opinion consultation for the above site / development, received by the LLFA on 11th April 2024. Please note that the LLFA previously provided comments to the LPA relating to a Screening Opinion Request for this proposal on 27th July 2023 (LLFA Ref: FW2023_0639 / LPA Ref: SC/2023/0001).

We have reviewed the Scoping Opinion documents as submitted and wish to make the following comments:

- The applicant has provided the following documents to you, the Local Planning Authority (LPA) as part of this Scoping, (Location Plan | Drawing No, C27B/1/SCOP/01 | Dated 03/04/2024), and (Scoping Opinion Document | Prepared by John Gough on behalf of Mick George | Dated 3rd April 2024) in support of this Scoping Opinion Request.
- As was the case with the Screening Opinion, the LLFA note that the proposals involves an extension to the existing Carbrooke Quarry and infilling using inert materials to form a composite restoration scheme on adjoining land at Carbrooke Quarry.

- The LLFA welcomes that the Agents Scoping Opinion Document (Dated 3rd April 2024) makes reference to the submission of a Flood Risk Assessment (FRA) as part of any formal planning application. However, we note that no details have been provided in respect of whether this will cover all sources of flood risk such as surface water run-off and groundwater and whether a Drainage Strategy will also be provided either as a separate document or as part of the FRA. It is also noted that the Screening Opinion Documents referred to the submission of an acceptable Hydrogeological Impact Assessment as part of any Planning Applications to identify potential impacts to groundwater and appropriate mitigation measures if required, along with a Hydrological Impact Assessment with any appropriate recommended mitigation measures taken, however this does not appear to have been referred to within the Scoping Document.
- Notwithstanding the above, the LLFA consider that a review of flood risk from all sources should be provided as part of any FRA / Drainage Strategy and accompanied by relevant mapping, to fully assess any implications of flood risk upon the proposed development and the surrounding area. Given the limited references to flood risk within the supporting documents, as our previous response, the LLFA advise that you should satisfy yourself that the information / assessment provided meets the standards expected by the Local Planning Authority (LPA).
- The LLFA advise that there are no watercourses on or within close proximity to the proposed site.
- We advise this site falls within Source Protection Zones 1 and 2 for surface / ground water.
- According to LLFA datasets (extending from 2011 to the date of this letter) we have no records of both internal and anecdotal (inclusive of external) flooding associated with the site, with 2 no. records within close proximity of the site, and 20 no. records within 2.5km of the site.
- We advise that the LLFA consider the development has the potential to impact flood risk offsite if not considered appropriately.
- We note that there are areas of surface water flood risk on site in the 3.33%, 1.0% and 0.1% AEP events, as shown by the [Environment Agency \(EA\) Risk of Flooding from Surface Water \(RoFSW\) mapping](#). The LLFA hold no information of groundwater flood risk onsite or within proximity of the site and would advise other sources are explored.
- There is no onsite flood risk associated with main rivers and the sea or from ordinary watercourses, as shown by the Flood Map for Planning (Rivers and Sea) [Flood Zone 2](#) and [Flood Zone 3](#) datasets and the [Environment Agency \(EA\) Risk of Flooding from Surface Water \(RoFSW\) mapping](#) (used as a proxy). We have not assessed flooding from sewers, reservoirs or artificial waterbodies.
- We would advise the EA are contacted for further information on their datasets, as required.

- We would advise that the benefits of an EIA will only support the site development and far outweigh the loss of not doing so but, ultimately, it is the responsibility of the LPA to decide whether a full EIA is required or not.
- The LLFA highlight the importance of considering surface water, groundwater, and flooding from ordinary watercourses in the best interest of development in the area.

Whether or not an EIA is required we consider that the following issues should be considered and addressed:

We strongly recommend that any EIA includes, or any planning application for development is accompanied by a FRA / surface water drainage strategy to address:

- All sources of flood risk, including those from ordinary watercourses, surface water and groundwater to the development.
- How surface water drainage from the development will be managed on-site and show compliance with the written Ministerial Statement HCWS 161 by ensuring that Sustainable Drainage Systems (SuDS) are put in place.
- How any phasing of the development will affect the overall drainage strategy and what arrangements, temporary or otherwise, will need to be in place at each stage of the development in order to ensure the satisfactory performance of the overall surface water drainage system for the entirety of the development.

This supporting information would assess the potential for the development to increase the risk of flooding from the proposal or how surface water runoff through the addition of hard surfaces will be managed. It will show how this will be managed to ensure that the development does not increase flood risk on the site or elsewhere, in line with National Planning Policy Framework (NPPF) (Paragraph 167).

In this particular case this would include appropriate information on:

- Appropriate assessment and mitigation of all sources of surface water flooding onsite/originating from offsite that may affect the development, in addition to risk of groundwater flooding.
- Sustainable Drainage Systems (SuDS) proposals in accordance with appropriate guidance including “Non-statutory technical standards for sustainable drainage systems” March 2015 by Department for Environment, Food and Rural Affairs.
- At least one feasible proposal for the disposal of surface water drainage should be demonstrated and in many cases supported by the inclusion of appropriate information. It is important that the SuDS principles and hierarchies have been followed in terms of:
 - surface water disposal location, prioritised in the following order: disposal of water to shallow infiltration, to a watercourse, to a surface water sewer, combined sewer / deep infiltration (generally greater than 2m below ground level).
 - the SuDS components used within the management train (source, site and regional control) in relation to water quality and quantity.
 - identifying multifunctional benefits including amenity and biodiversity.

- The drainage strategy should also contain a maintenance and management plan detailing the activities required and details of who will adopt and maintain all the surface water drainage features for the lifetime of the development.

Please note, if there are any works proposed as part of this application that are likely to affect flows in an ordinary watercourse, then the applicant is likely to need the approval of the County Council. In line with good practice, the Council seeks to avoid culverting, and its consent for such works will not normally be granted except as a means of access. It should be noted that this approval is separate from planning.

Further guidance for developers can be found on our website at <https://www.norfolk.gov.uk/rubbish-recycling-and-planning/flood-and-water-management/information-for-developers>

Yours sincerely,

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Assistant Flood Risk Officer
Lead Local Flood Authority

On behalf of Norfolk County Council as Lead Local Flood Authority

Disclaimer

We have relied on the accuracy and completeness of the information supplied to us in providing the above advice and can take no responsibility for incorrect data or interpretation, or omissions, in such information. If we have not referred to a particular issue in our response, it should not be assumed that there is no impact associated with that issue.