

National Infrastructure Planning
Temple Quay House
2 The Square
Bristol
BS1 6PN

Your ref: TR010016

Date: 10 May 2019

[sent via email:
A63CastleStreet@PlanningInspectorate.gov.uk]

Dear Sir/Madam,

A63 CASTLE STREET IMPROVEMENTS – ENVIRONMENT AGENCY – RESPONSE TO EXQ1

As requested, our response to the Examining Authority's written questions (ExQ1) on the above proposal is as follows:

ExQ1.4.1 – Changes to the dDCO

As we have mentioned in earlier representations, we consider that the draft Development Consent Order would benefit from a number of additional Requirements, to ensure that appropriate measures to mitigate or manage flood risk are properly secured.

1. Firstly, we would consider that a Requirement requesting final details of the technology to be used for closure of the underpass, including the use of physical barriers, either on receipt of a flood warning or onset on flooding. The scheme must include consideration of how the technology will remain operable in the event of power loss.

The Flood Emergency and Evacuation Plan (Appendix B of APP-052) includes two possible options proposed to be used in the event of flooding of the underpass. Without this Requirement, people could be put at risk by entering the underpass during a flood. While it is not our role to assess the suitability of emergency procedures, we consider that a physical barrier would be much more effective at preventing people entering the underpass than the sole use of signage. In addition, many of the proposed measures rely on technology, which could be rendered ineffective should there be local power loss as a result of the flooding.

2. Secondly, we consider that a Requirement for a Recovery Plan is necessary, to confirm temporary arrangements for the discharge of flood water, including its final destination. The Requirement should ensure that appropriate permits will be obtained from the Environment Agency prior to there being need of the recovery operation. This will ensure that recovery of the underpass can be achieved as quickly as possible following a flood and that all environmental risks have all been considered and mitigated beforehand.
3. Finally, we consider a Requirement is necessary to secure the submission of details of resilience measures for the proposed surface water pumping station to an agreed level (in metres above Ordnance Datum). Sensitive equipment should be raised as high as practically possible, to reduce the chance of the pumping station becoming damaged or inoperable during a flood. This could result in further delays during the recovery phase whilst the pumping station is brought back online, which could seriously impact traffic flow in the city in the days following a flood.

Once the applicant has considered an achievable level of resilience for the surface water pumping station, we would be happy to work with them on the proposed wording of such of Requirements.

ExQ1.10.1 - Proposed Pumping Station

We have been provided with limited details of the proposed pumping station, although an outline plan has been provided in APP-009, and no proposed flood risk mitigation to protect the pumping station has been discussed at present. We do not consider that we have received sufficient information at this stage to assess the risk to the surface water pumping station. We cannot therefore determine whether the pumping station will be appropriately flood resilient and resistant, as required by paragraph 5.99 of the National Policy Statement for National Networks.

It is possible that details of any proposed resilience measures may be secured through a Requirement on the DCO, but with the level of protection (in metres above Ordnance Datum) to be agreed now. We understand that the applicant is currently attempting to determine a suitable and realistic level of protection for the pumping station. Once this is determined, we may be able to consider appropriate wording for a draft Requirement to secure this.

We expect that the applicant will provide you with an explanation regarding the outfall, although it is our understanding that surface water from the underpass will now drain to Yorkshire Water sewer and not via an outfall to the Humber estuary under normal circumstances. Should the underpass flood, the recovery phase may involve flood water being discharged directly into the estuary, although it is not anticipated that a permanent outfall would be required for this. As stated in our response to ExQ1.4.1, we consider that this can be dealt with via a new Requirement for a recovery plan.

We are not absolutely clear on the meaning of the final question, which asks 'whether the impact of the construction work has been considered in the ES'. We think that this may relate to the discharge of surface water during the construction phase. We would suggest that the applicant considers phasing the works to ensure that the pumping station is in place early in the construction programme to ensure

that surface water runoff can be adequately managed with appropriate pollution prevention measures in place during the construction period.

ExQ1.10.3 – Flood Risk

The applicant considers that no additional mitigation can be designed into the scheme, as any further attempt to raise roads or keep water out of the underpass will result in additional water being pushed elsewhere, and potentially further increasing flood risk depths or hazards to people and property in the surrounding area. The applicant has concluded that there would be no way to mitigate this offsite increase in risk.

In respect of determining the significance of the potential increases in flood risk to the surrounding area, the Flood Risk Technical Information Note within Appendix B of the Accompanying Documents for the Relevant Representations, submitted by Highways England in April 2019, includes figures showing the difference in flood extent resulting from the development, as well as percentage changes in depths and changes to hazard rating, over a range of scenarios. However, we respectfully highlight that in order to pass the Exception Test, the project must be safe for its lifetime without increasing flood risk elsewhere.

Section 2.6 of the Flood Risk Technical Information Note submitted by the applicant discusses the requirement within the Outline Environmental Management Plan for suitable emergency procedures to be outlined, including a plan for the evacuation of the construction footprint in the event of extreme flooding. It states that plans will ensure safety of personnel and protection or removal of other sensitive material likely to be mobilised during a flood. Appropriate places of safety have also been outlined for each compound, in line with Figure 15 of Hull City Council's Strategic Flood Risk Assessment, which determines the minimum level that a place of safety should be at depending upon the development's location within the city.

We trust this answers your questions sufficiently. However, please contact me on the details below if I can be of any further assistance in these matters.

Yours faithfully



Miss Lizzie Griffiths
Sustainable Places - Planning Specialist

Direct dial 020 302 58439

Direct e-mail lizzie.griffiths@environment-agency.gov.uk