SWAVESEY INTERNAL DRAINAGE BOARD

I. A. D. SMITH B.A., Solicitor Clerk to the Board PINS RECEIVED

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MIDDLE LEVEL OFFICES
85 WHITTLESEY ROAD
MARCH
CAMBRIDGESHIRE
PE15 0AH

Telephone: (01354) 653232 Fax: (01354) 659619

E-mail:

admin@middlelevel.gov.uk

www.middlelevel.gov.uk

Your Ref: TR010018 Our Ref: SW/14d

05 June 2015

Dear Sir

Planning Act 2008 (as amended)

Application by Highways England for an Order granting Development Consent for the A14 Cambridge to Huntingdon Improvement Scheme Representations by the Swavesey Internal Drainage Board

I refer to letter from Frances Fernandez, the Lead Member of the Panel of Examining Inspectors dated 21st May, and the request for interested parties to submit written representations and comments on the above proposed project by 15th June. This letter therefore contains the comments and representations of the Swavesey Internal Drainage Board.

The Swavesey Internal Drainage Board (the Board) are a statutory Internal Drainage Board within the meaning of the Land Drainage Act 1991 and exercise jurisdiction over the Swavesey Internal Drainage District, shown on the attached plan. This District adjoins the village of Swavesey. By design, the District only enjoys a level of flood defence protection from the adjoining main river system maintained by the Environment Agency of 1:10 (10% chance per annum of flooding) and the Board are therefore extremely concerned to seek to ensure that the above proposals do not increase the level of flood risk for their catchment.

The Board's position is that it accepts the proposed scheme provided that the works achieve drainage flows equivalent to at least current greenfield rates from both the main highway and the local access roads and that the works ensure that the level of flood risk will be (as a minimum) no worse and so far as possible, better than if the roads had not been built.

The Board's District is dependent, for free drainage, on the operation of Webbs Hole Sluice, a structure operated by the Environment Agency on the main river Swavesey Drain. This allows flows from the Board's District and the surrounding catchment to pass into the River Great Ouse when levels permit but the Sluice will shut, at times of high levels within the River, which will therefore lead to flood waters entering the flood meadows around the village. The Board would therefore wish for the design of the drainage scheme to be to allow appropriate flows to pass into the river system when Webbs Hole is open and for balancing to occur when the Sluice is closed. The Board are concerned that to do otherwise will lead to flows being attenuated and held in balancing areas when they would have been able to be discharged, thus increasing the flood risk and the amount of water required to be stored, when balancing is required. In the Board's opinion, it will be important for the balancing areas to be emptied when free flow is possible, to create the maximum storage for when the Sluice is closed.

The Board are concerned to ensure that the attenuation facilities, balancing ponds and any other relevant drainage facilities provided will be adequately maintained and that the level and frequency of this maintenance is stated and in the public domain before approval to the project is given. It will be appreciated that even if such facilities are adequate at the outset, lack of proper maintenance will materially diminish their performance over time. The Board have sought to obtain from Highways England (and its predecessor body) details of the intended maintenance regime for these facilities but, so far, without success. We would therefore request that the Inspectors require the provision of and satisfy themselves as to the adequacy of this regime.

The Board also have a number of more specific queries which have been raised with the Applicant's consultants but on which responses are still awaited. While a number relate to the detail of the design, it is felt that they need to be assessed at this stage as they would, if not properly considered, affect the performance of the new roads.

These queries relate to:-

- (a) The modelling outputs in terms of flows for the areas around the proposed Swavesey junction
- (b) The impact of surface water drainage from Bar Hill and the proposed Northstowe developments on the proposals particularly in the light of concerns that the mitigation measures currently in place for Bar Hill do not appear to be properly functioning.
- (c) The envisaged status of the proposed balancing ponds in terms of ecological designation and how it will be ensured that they continue to serve their primary function.
- (d) The impact of the flows from the local access roads
- (e) The impact of the removal and/or modification of existing culverts
- (f) the design of the ponds ensuring that appropriate machine access for maintenance is available and retained.

Yours faithfully
Clerk to the Board

The Planning Inspectorate 3/18 Eagle Wing Temple Quay House 2 The Square Bristol BS1 6PN

