

**A14**  
**Cambridge to Huntingdon**  
**improvement scheme**  
Development Consent Order Application

**HE/A14/EX/51**

TR010018

**HE/A14/EX/51**

**Highways England's comments on the Written Representations**  
**Report 3: Environmental Statutory Organisations**

**July 2015**

The Infrastructure Planning (Examination Procedure) Rules 2010



# **A14 Cambridge to Huntingdon improvement scheme**

Development Consent Order Application  
Response to written representations  
(Report 3: Environmental statutory bodies)

**HE/A14/EX/51**

**07 July 2015**

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# 1 Introduction

## 1.1 Purpose of this report

- 1.1.1 A total of 2 written representations were submitted to the Examining Authority at deadline 2 (15 June 2015) by persons with an interest in the land, as listed below.
- Environmental Agency; and
  - Natural England
- 1.1.2 The report provides Highways England's response to the principal issues raised, thereby providing a reference document to all interested parties and the Examining Authority.
- 1.1.3 The report focuses on substantive issues raised in written representations and does not comment on introductory or contextual information.

## 1.2 Structure of this document

- 1.2.1 The written representations raised a wide range of specific and detailed issues. This report is structured by Interested Party, in order to provide a response to specific issues raised. The report therefore includes a chapter for each Interested Party as listed in 1.1.1 above.
- 1.2.2 Within each chapter the report provides an overview of the Interested Party and the issues raised by the written representation. The overview also notes any points made in support of the scheme. The written representations raised a wide range of detailed issues, and these are structured within each chapter by principal issue in line with the principal issues identified in Annex C of the Rule 6 letter. These sections set out the issues raised with quotes and summaries and the Highways England response to these issues.

## 1.3 Ongoing engagement

- 1.3.1 Highways England continue to engage with environmental statutory bodies, including through the preparation of statements of common ground and ongoing meetings. Many of the issues set out in this report, will also be addressed as part of this ongoing engagement.

## 2 Environment Agency

### 2.1 Overview

- 2.1.1 The Environment Agency submitted a written representation (dated 15 June 2015) identifying issues regarding: culverts and wildlife, landfill infrastructure, watercourse realignments, impacts on the Great River Ouse, consenting powers, borrow pits, flood risk and soil storage areas.
- 2.1.2 The representation raises principal issues as detailed below. Quotes and summarises taken from the Environment Agency's written representation are highlighted in bold, followed by a response from Highways England.
- 2.1.3 In addition to issues raised, the Environment Agency also noted that the Agency supports the A14 Cambridge to Huntingdon Improvement Scheme as a key piece of national infrastructure which will improve the safety and journey time across one to the busiest east to west transport routes in the country.

## 2.2 Biodiversity and ecological conservation

### Key issue

***“The detailed design should show that the culverts will be accessible and allow passage for the wildlife that needs to use them. This should include wildlife likely to be using all watercourses, including small or dry ditches. We would therefore wish to be able to review all final proposals through the detailed design phase.” (Page 35, Para 5.1.4)***

### Highways England response

- 2.2.1 The design of all culverts would be developed during detailed design after the development consent order (assuming the application is granted) is made and will be available for review and approval by the Environment Agency prior to the commencement of works.
- 2.2.2 Highways England is committed to ongoing consultation with the Environment Agency in relation to developing the detailed design in relation to culverts and wildlife access which will continue after the development consent order is made (if the application is granted).
- 2.2.3 Section 12, paragraph 12.1.5 of the CoCP requires the main contractor to consult with the Environment Agency amongst others. The CoCP is itself secured by Schedule 2 to the draft Development Consent Order (DCO).
- 2.2.4 In addition, these matters will be secured by protective provisions to be included in the DCO, under which the Environment Agency will have a general plan approval role in relation to matters relating to its statutory functions.

## 2.3 Environmental Impact Assessment

### Key issue

***“4.1.4 We would also request that a contingency plan be provided in the event that landfill infrastructure is compromised. Also, we need to ensure that monitoring data collected from new wells are consistent with previously collected data and there are no significant deviations. Whilst this is a technical issue associated with the regulation of the site, we need to ensure that the site operators are able to retain the responsibility for the ongoing operation of the site.***

***4.1.5 We would therefore suggest a specific requirement be incorporated within any DCO to address;***

- 1. That in accordance with Item G10 of the REAC (ES Appendix 20.1) - the landfill integrity will be maintained during construction. This has been identified as being provided through contractual agreement between Highways England and the design and construction contractor.***
- 2. That a contingency plan is provided in the event that landfill infrastructure is compromised.” (Page 29 para 4.1.4 and 4.1.5)***

### Highways England response

- 2.3.1 At this stage Highways England envisage that the level of detail sought in Paragraph 4.1.4 of the written representation would be included at the detailed design and construction stages of the project after the development consent order is made (if the application is granted).
- 2.3.2 Reference is also made to the responses to the written representation from the operator of Milton Landfill (FCC Environment) which covers similar concerns.
- 2.3.3 Paragraph 4.1.4 requests a contingency plan in the event of damage to the landfill infrastructure. Highways England considers that is not required, on the basis of the provisions contained in the Code of Construction Practice (particularly section 5.8) which is secured by the requirements in Schedule 2 to the draft DCO.

- 2.3.4 Para 4.1.4 also requests the validation of the suitability of the replacement monitoring wells and any further work required to investigate results deemed to be unrepresentative. It is considered reasonable for the applicant to be responsible for the provision of replacement monitoring wells to satisfy the reasonable regulatory requirement for the permit monitoring, however this responsibility should not extend beyond the replacement wells. All parties will be aware that there is inherent uncertainty in gas and groundwater migration and some variation is to be expected in new monitoring wells. A standalone requirement is not considered necessary on the basis that in addition to the contractual commitments that would be put in place, Highways England would be dis-incentivised from allowing any effects on the landfill integrity to occur because background environmental law would impose liability on Highways England for this.
- 2.3.5 Discussions with regard to how these provisions will be adequately secured are ongoing between Highways England, the Environment Agency and other relevant stakeholders. Highways England is happy to discuss any residual concerns further.

## Key issue

### ***“Update for Written Representations***

***5.4.1 The watercourse realignments are referred to in more detail in the WFD opportunities document. Please refer to this document for further detail. We are seeking to secure Protective Provisions to address the details of watercourse realignments (Issues 1.2 and 1.3, above). Through this process we will incorporate the consideration of the specific issues raised within our Relevant Representations. Page 37.” (Page 37, Para 5.4.1)***

## Highways England response

- 2.3.6 The watercourse realignments will be subject to a detailed design if the DCO is made, fully taking account of hydromorphological, ecological and physico-chemical elements (under WFD) and providing an appropriate level of mitigation.
- 2.3.7 Highways England is involved in ongoing discussions with the Environment Agency as to how certain elements of their concerns will be alleviated, whether through protective provisions or otherwise. It is anticipated that watercourse realignments will form part of these discussions.

## 2.4 Design and Engineering Standards

### Key issue

***“Viaduct crossing over the River Great Ouse, as detailed under issue 1.23, the piers of the proposed viaduct under Annexe H of the FRA in Appendix 17.1 drawing no A14-ACM-BN-05-DR-S-00021 rev P00.1 are currently too close to the river to allow our staff to access the banks to undertake maintenance works. The design of the viaduct will therefore need to be revised to allow us to adequate access along the bank with vehicles and machinery.” (Page 9, Para 1.7.4)***

### Highways England response

- 2.4.1 A hardened access track 6.0m wide with 4.5m headroom would be provided running parallel to the River Great Ouse to allow the Environment Agency access along the river and at a position to be agreed with the Environment Agency. The access track would go around the pier columns.
- 2.4.2 The proposed piers for the viaduct would comprise a number of individual support columns, that is not a single continuous wall and will therefore allow maintenance vehicles to go around the individual support but still achieve reasonable access to the river for maintenance. Increasing the main span of the viaduct would require an increase in depth of the bridge beams which would then require the alignment of the A14 to be raised to maintain the required navigation clearance. Both of these changes would have negative visual impacts to the surrounding area and a key aspect of the design has been to minimise those impacts as documented in the Environmental Statement and Consultation Report.

### Key issue

***“As the Navigation Authority for the Great Ouse we are responsible for ensuring the navigation channel and any adjoining defined spaces are appropriate to allow the safe movement of traffic on the river. We define this as the ‘Navigation Envelope’. The minimum channel width is 12 metres and the minimum headroom or “airdraft” is 3 metres above normal retention levels (of the water in that channel) to the soffit level of the viaduct.  
Any reduction in the Navigation envelope with temporary and permanent structures should be eliminated or minimised in both the construction***

***and operational phases related to the proposed A14 improvement  
scheme.” (Page 25, Para 2.1 & 2.2)***

**Highways England response**

- 2.4.3 For the permanent bridge, a minimum of 3m vertical clearance above the 100 year flood level including 20% climate change allowance would be provided, with a channel width of at least 12m. The exact dimensions will be determined during detailed design after the development consent order (assuming the application is granted) is made.
- 2.4.4 In the development of the design of the temporary bridge Highways England will consult with the Environment Agency to minimise impacts on the navigation channel.

## 2.5 Water Issues

### Key issue

***“These all relate to our [EA] ability to retain our consenting powers in relation to any works in, over or under any designated main river, under Section 109 of the Water Resources Act 1991, and any works that fall within the provisions of the relevant land drainage byelaws (which are our Agency Anglian Region Land Drainage and Sea Defence Byelaws). Within sections 3 (a) and 3(b) of Part 1 of the draft DCO, the applicant has sought to remove the requirement to obtain the necessary consent from ourselves under this legislation. Section 150 of the Planning Act provides that this proposed disapplication of legislation cannot take place without our consent.***

***1.6 We consider that it is important for us to retain our ability to approve any works affecting main rivers in order to ensure that there will be no increase in flood risk elsewhere and no adverse impact on the status of the relevant Water Framework Directive (WFD) waterbody, but we are content to consider achieving this by way of protective provisions within the DCO.***

***1.8 Draft DCO section 7, page 8 - We have concerns relating to the lateral or vertical movement of the route within the area to be compulsory purchased to deliver the scheme. This is particularly in the vicinity of designated main rivers where we would not want the deviation of the scheme to impact upon our maintenance responsibilities (see point 1.7, above). The wording at the end of (b) this Article regarding vertical deviation is particularly, and our view unnecessarily wide.” (Issues 1.1 to 1.5, 1.8, 2.2)***

### Highways England response

- 2.5.1 The detail of the proposed protective provisions to be included in the Order covering the items listed above is currently under discussion between Highways England and the Environment Agency.
- 2.5.2 Highways England considers the wording in article 7 of the draft DCO to be appropriate in respect of the limits of deviation. It ensures that no deviation would give rise to any materially new or worse adverse environmental effects. It is anticipated that any concerns the Environment Agency has as to this could be dealt with through protective provisions, without requiring an amendment to article 7 of the draft DCO. However, Highways England is happy to discuss any residual concerns.

## Key issue

***“We would advocate that some of the borrow pits along the route incorporate appropriate design, restoration and operation in order to deliver flood risk betterment to downstream built-up areas.” (Issue 1.6)***

## Highways England response

2.5.3 The National Planning Policy Framework and National Policy Statement for National Networks (NPS) do not require the scheme to mitigate pre-existing flooding issues. Measures are included to provide mitigation for the impact of the proposed scheme and will ensure that it would not worsen or contribute to existing flooding issues. However they do not provide direct mitigation for the pre-existing flooding issues. It is not necessary to mitigate those separate issues in order to make the application acceptable in planning terms (please refer to section 5.103 of the NPS).

## Key issue

***“Within Schedule 7 of the draft DCO there are areas of land identified for the potential location of Soil Storage Areas (SSAs) in Flood Zone 3 (high risk). We have communicated through earlier pre-application discussions that we would not wish to see SSAs located within Flood Zone 3.” (Issue 1.9)***

## Highways England response

2.5.4 A document (A14-JAC-ZZ-XX-TN-EN-0001: A14 FRA Addendum 01.1 - Soil Storage Areas) was submitted to the Environment Agency in June 2015 as an addendum to the Flood Risk Assessment for their acceptance. The document presents to the Environment Agency that through ongoing design development the temporary soil storage areas previously proposed within Flood Zone 3 are no longer required, primarily as a result of the design changes of the river Great Ouse embankment. We understand this document is currently being reviewed by the Environment Agency.

## Key issue

***“The FRA clearly states the increase in flood levels at these locations [Ellington Brook, Bramton Brook and the river Great Ouse] and highlights these 3 areas where open land, mainly farmland will result in increased flood levels due to the scheme. We have stated that each landowner should be visited and the increased duration, frequency and depth of flooding explained to them and ourselves so that an informed***

***decision can be made on the acceptability of this increase in flood risk. This information is not held within the FRA.” (Issue 1.10 to 1.12)***

### Highways England response

- 2.5.5 Highways England is currently developing the documentation which summarises the predicted changes to flood risk on the three watercourses. The intention is to submit this to the Environment Agency for acceptance and then to the affected landowners and drainage authorities.
- 2.5.6 A document (A14-JAC-ZZ-XX-TN-EN-0002: A14 FRA Addendum 02.1 – Summary of changes to flood risk on Ellington Brook) was submitted to the Environment Agency in June 2015 for acceptance before forwarding to affected landowners and the relevant drainage authority for their acceptance.
- 2.5.7 Highways England is currently developing similar documents summarising the changes to flood risk on Brampton Brook and the river Great Ouse for submission to the Environment Agency and the affected landowners and drainage authorities. Highways England's response to the written questions indicated that this would be provided by late June. The process has been delayed but it is intended to submit the two outstanding reports by mid-July.

### Key issue

***“We seek clarifications as to the maintenance parameters for the surface water drainage system from the new route. Whilst we are aware of the existence of the applicant's maintenance programme for trunk roads, we could not locate any reference to this within the application.” (Issue 1.13)***

### Highways England response

- 2.5.8 Periodic inspection and maintenance of existing drainage assets is carried out at appropriate intervals by Highways England or Cambridgeshire County Council dependent on ownership. This regime would also be applied to the maintenance of proposed drainage assets.
- 2.5.9 Details of the proposed maintenance regime of the new road would be included in the scheme Operation and Maintenance Manual and provided through the detailed design process following grant of the DCO.

### Key issue

***“Within the FRA and associated Annexes (and the Design Input Statement) the climate change allowances for runoff control***

***(attenuation) are stated as 20% increase in rainfall within the calculations. The FRA states the lifespan of the scheme is 100 years (within FRA conclusion point 29.1.10 Exception Test). Therefore the climate change allowances used should be beyond 2085 and therefore should be using 30% increase in rainfall total for the runoff calculation (in accordance with the UKCP09 projections).***

***The lifetime of the scheme needs to be clarified (it was previously calculated to 2085, 70 years from design). If it is 100 years then each attention design needs to be revisited and recalculated. Further storage may be required for some locations to allow for the increase from 20% rainfall inputs to 30% rainfall inputs.***

***We therefore request confirmation as to the lifespan of the proposal and the application of the correct climate change allowances for it.” (Issue 1.14)***

## **Highways England response**

2.5.10 Please refer to Highways England's response to written question 1.13.9 from the Examining Authority (Response to Examining Authority's First Written Questions - Report 13 (document reference: HE/A14/EX/40).

2.5.11 The proposed design of balancing ponds and similar storage facilities has been based on providing sufficient storage for the critical duration 1 in 100 year storm event +20% climate change allowance in rainfall intensity. This is based on the design life expectancy for drainage assets to be 60 years, as stipulated by Highways England (Highways Agency – Climate Change Risk Assessment, August 2011), making them life expired around 2080. This would be consistent with the guidance contained within “Climate change allowances for planners” (Environment Agency, September 2013). In the event that the anticipated design life expectancy of the drainage assets exceed year 2085 or future proofing of drainage assets is required, then further consultations with EA and CCC would be carried out at detailed design stage following the making of the DCO (if granted). The design of balancing ponds would provide, as far as is reasonable, for increase in the size of the ponds (or provision of alternative measures at reasonable cost) at a future date to provide for a forecast minimum 30% climate change allowance in rainfall intensity beyond year 2085 up to year 2115.

2.5.12 This approach has been agreed with the Environment Agency and Cambridgeshire County Council (as the lead local land drainage and flood defence body) and written confirmation of the approach has been received from both Authorities.

## Key issue

***“1.15.1 With regards to Issues 1.15 to 1.21, there are several key issues with the floodplain compensation (FpC) areas that need to be addressed as part of the proposal. These are required in order for us to find the FpC an acceptable method of mitigating the loss of areas of floodplain. The A14 will dissect across several floodplains within the River Great Ouse catchment, including the River Great Ouse and many of its tributaries.***

***The Flood Risk Assessment needs to explain the importance of constructing the FpC areas prior to the commencement of construction of the relevant road sections, to prevent an overall loss of floodplain.” (Issues 1.15 to 1.21)***

## Highways England response

2.5.13 Section 23.4.1 (second bullet point) of the Flood Risk Assessment states that “[floodplain] compensation areas would be constructed ahead of any works which would cause loss of floodplain storage capacity.”

## Key issue

***“The applicant should be required to develop a programme to provide full details of each FpC area with levels and model data, including digital terrain modelling, so that these areas can be incorporated as floodplain within future Flood Map updates to ensure they are secure for the lifetime of the scheme. The Design Impact Statement should also be revised to address this issue.”***

## Highways England response

2.5.14 The floodplain compensation areas have been developed with 3D modelling software (MX) and are currently being rationalised using the hydraulic models. Highways England will make this information available once the detailed design of the areas is finalised after the DCO has been made (if the application is granted).

## Key issue

***“Several of the proposed flood compensation areas are shown to be within Flood Zone 3, which is unacceptable as they will not provide the required level for level floodplain compensation and could increase flood risk elsewhere. These areas will need to be relocated unless evidence can be provided to demonstrate that these areas are not currently in the floodplain.***

- ***Please refer to Highways England's response to the Examining Authority's written question 1.13.12. (Response to Examining***

**Authority's First Written Questions - Report 13 (document reference HE/A14/EX/40)**

- ***In some cases the hydraulic model used to assess the impact of the scheme is more detailed than that provided by the Environment Agency and therefore has produced a refined extent of Flood Zone 3. Highways England will be presenting the supporting evidence (hydraulic models) to the Environment Agency shortly for agreement during examination.***

***“Some of the FpC areas are not aligned with the existing floodplain and therefore may not operate effectively.***

***Some of the FpC areas are not in direct contact with the existing floodplain and therefore will not act in the same way as the existing floodplain that is being lost to the scheme. This could result in an increase in flood risk to third parties.”***

### **Highways England response**

2.5.15 Further hydraulic modelling is currently being progressed by Highways England to refine the design of the floodplain compensation areas in question. The results will be presented to the Environment Agency during the examination to demonstrate that the floodplain compensation areas provide the necessary flood risk mitigation.

### **Key issue**

***“Several FpC areas are noted as also having soil storage areas within them. This is unacceptable as the loss of floodplain storage due to soil storage would result in an increase in flood risk elsewhere.”***

### **Highways England response**

2.5.16 A document (A14-JAC-ZZ-XX-TN-EN-0001: A14 FRA Addendum 01.1 - Soil Storage Areas) was submitted to the Environment Agency in June 2015 as an addendum to the Flood Risk Assessment for their acceptance. The document presents to the Environment Agency that through ongoing design development the soil storage areas which had been located within floodplain compensation areas can now be deleted from the design.

### **Key issue**

***“Although our concerns with an earlier version of the proposal, relating to the crossing over the River Great Ouse have been addressed through a revised design of the crossing, we consider that further changes need to be made to this design to ensure there will be no increase in flood risk to third parties. As detailed under issue 1.23, the piers of the viaduct within the floodplain should be rotated approximately 45 degrees to make these in line with flood flow routes. The piers of the viaduct should***

***also be hydrodynamic in shape to allow flood waters to move around them smoothly and quickly.” (Issue 1.15.3 / 1.23)***

### Highways England response

2.5.17 The orientation and detail of the river Great Ouse crossing piers will be resolved during detailed design following the making of the development consent order (if the application is approved) and through consultation with the Environment Agency. The design parameters provided for by the DCO application will not require any revision.

### Key issue

***“Annexe D of the FRA holds the reports of the hydraulic models used but each model is also required.***

***Whilst reports have been submitted, we need to fully assess each watercourse where modelling data is available to assess what the impact of the scheme is and if we agree with the methodology of the modelling used and its findings.***

***The actual hydraulic models need to be submitted directly to us for full review in accordance with the reports set out in Annexe D along with any further updated models.” (Issue 1.24)***

### Highways England response

2.5.18 The hydraulic models used to assess the impact of the scheme on flood risk by Highways England were submitted in Autumn 2014 to the Environment Agency for review. Comments were received which are currently being addressed. The revised and additional hydraulic models are in the process of being re-submitted between June and October 2015 for acceptance by the Environment Agency.

### Key issue

***“As the Navigation Authority for the Great Ouse we [the Environment Agency] are responsible for ensuring the navigation channel and any adjoining defined spaces are appropriate to allow the safe movement of traffic on the river Any reduction in the Navigation envelope with temporary and permanent structures should be eliminated or minimised in both the construction and operational phases related to the proposed A14 improvement scheme.” (Issue 2.0)***

### Highways England response

2.5.19 It is not proposed to reduce the navigation envelope as a result of the new crossing of the river Great Ouse. The minimum channel width will remain 12 metres and the minimum headroom or “airdraft” will remain 3 metres above normal retention levels (of the water in that channel) to the soffit level of the river Great Ouse viaduct.

## Key issue

***“Highway run-off from accidental spillages has the potential to damage receiving watercourse through liquid contaminants being discharged to watercourses. We request that either through the detailed design phase or as part of a formal requirement of the DCO, the applicant provide a sufficiently detailed accident management plan to ourselves and emergency services, including locations of pollution control points, secure access arrangements and operational design information.” (Issue 3.1)***

## Highways England response

2.5.20 Highways England will consider the appropriateness of developing such an accident management plan, in the context of all other controls in place for the construction and operation of the authorised development

## Key issue

***“The Environment Agency is seeking, throughout their Written Representation, a number of new requirements for inclusion within the draft DCO in respect of different topics relating to flood risk (amongst others).” (General request for new requirements)***

## Highways England response

2.5.21 Discussions with regard to how the Environment Agency's requests will be secured are on-going between Highways England, the Environment Agency and other relevant stakeholders. Following these discussions, any requirements that are appropriate for inclusion within the draft DCO will be reflected in revised versions submitted to the Examination at future deadlines.

## Key issue

***“Annexe B of the FRA should be revised to show that all soil storage areas (SSAs) will be located outside the extent of Flood Zone 3.” (Appendix A – 1.9)***

## Highways England response

2.5.22 A document (A14-JAC-ZZ-XX-TN-EN-0001: A14 FRA Addendum 01.1 - Soil Storage Areas) was submitted to the Environment Agency in June 2015 as an addendum to the Flood Risk Assessment for their acceptance. The document presents to the Environment Agency that through ongoing design development the temporary soil storage areas previously proposed within Flood Zone 3 are no longer required, primarily as a result of the design changes of the river Great Ouse embankment. We understand this document is currently being reviewed by the Environment Agency.

## Key issue

***“Our concerns relating to climate change allowances will need to be addressed within a revised FRA.” (Appendix A – 1.9)***

## Highways England response

2.5.23 Please refer to the response to section 1.14. The Flood Risk Assessment will be revised accordingly.

## Key issue

### Appendix A – 1.15 – 1.21

## Highways England response

2.5.24 A drawing on inter-connectivity between areas of floodplain loss and floodplain compensation will be included in the revised Flood Risk Assessment.

2.5.25 Plans of the floodplain compensation areas will be included in the revised Flood Risk Assessment.

2.5.26 The information requested relating to the floodplain compensation areas will be provided to the EA once they have been finalised during detailed design, following the making of the DCO, if the application is granted.

2.5.27 Where floodplain compensation areas are located within the current Flood Zone (please refer to our response to Section 1.17) it is as a result of a discrepancy between the flood extent predicted by the hydraulic model used to assess the impact of the scheme and that used by the Environment Agency to define the flood zone. Highways England will submit its hydraulic models to the Environment Agency for review to agree the revised flood zone extent.

2.5.28 A statement stating that the Borrow Pits that act as floodplain compensation will be secured for the lifetime of the scheme will be included in the revised Flood Risk Assessment.

2.5.29 The revised Flood Risk Assessment will demonstrate with submission of the hydraulic models to the Environment Agency for review that the floodplain compensation areas achieve the flood risk mitigation required.

2.5.30 Please refer to Highways England's response to Appendix A Item 1.9.

## Key issue

***“The FRA should include a statement which recognises that changes will need to be made to the design of the viaduct crossing of the River Great Ouse at the detailed design stage to ensure that the piers are in alignment with flood flows and our staff are able to access the banks of the River Great Ouse for maintenance purposes.” (Appendix A – 1.23)***

## Highways England response

2.5.31 This will be resolved during detailed design after the development consent order (if the application is granted) is made.

## Key issue

***“Annexe B of the FRA needs to be revised as many of the ordinary watercourses are marked as main rivers. The plans included in Appendix 17.1 in Annexe H of the FRA need to be revised to address this issue and to demonstrate that our staff will be able to access the banks of the River Great Ouse for maintenance purposes.” (Annex B)***

## Highways England response

2.5.32 Environmental Statement Figure 17.2 (included in the Flood Risk Assessment in Annex B) will be updated for inclusion in the revised Flood Risk Assessment.

2.5.33 The bridge crossing drawings will be amended through detailed design, if the development consent order is granted, in accordance with Highways England response to item 1.23.

## Key issue

### Appendix A - 2

## Highways England response

2.5.34 Hydraulic models have been provided for review by Highways England to the Environment Agency in support of the Flood Risk Assessment. The models are presently being updated to address the comments received and will be re-submitted to the Environment Agency for review and acceptance.

## 3 Natural England

### 3.1 Overview

- 3.1.1 Natural England submitted a written representation (dated 15 June 2015) identifying issues regarding protected species and habitat creating.
- 3.1.2 The representation raises principal issues of as detailed below. Quotes and summaries taken from Natural England's written representation are highlighted in bold, followed by a response from Highways England.
- 3.1.3 In addition to issues raised, the written representation also noted that Natural England supports the A14 Cambridge to Huntingdon Improvement Scheme and is satisfied with the level of mitigation proposed in the Environmental Statement and that the provision of a suitably worded requirement in the DCO will secure the detailed design of ecological mitigation. Natural England also note that no significant effects on European designated sites result from the scheme.

## 3.2 Biodiversity and ecological conservation

### Key issue

***“Natural England accepts the measures proposed for mitigating the impacts of severance on bats as set out in paragraph 11.5.200 of the ES. However, we cannot agree with the ES conclusion that the impact of this severance (of habitat) can be assessed as being neutral until more detailed information on the design of these mitigation measures is supplied. For example, further detail is required regarding the culverts to be designed for bats, and the location of the proposed bat hop-overs and high quality habitat creation and management (ES ref 11.5.200). This information should be provided in the detailed design phase and secured by way of the additional DCO requirement.” (Page 32, Para 5.3.4)***

### Highways England response

- 3.2.1 More detail on the mitigation will be developed during the detailed design after the development consent order (assuming the application is granted) is made, which will be subject to ongoing consultation with Natural England (NE). Highways England has discussed the process of the detailed design with NE, which is documented in the SoCG submitted at Deadline 3. NE is satisfied with the approach as also documented in the SoCG.
- 3.2.2 Highways England has included a new requirement for the securing of ecological mitigation in the latest draft of the DCO submitted at Deadline 4. Highways England would welcome further comment on the wording of this requirement.

### Key issue

***“Natural England understands that delivery of:***

- a) The Brampton Meadow SSSI mitigation area;***
- b) Wildlife commuting routes, e.g. culverts and tunnel design, planting design;***
- c) Habitat creation and management outside that needed for protected species licensing;***
- d) The lighting strategy to ensure minimal light spill onto sensitive ecological receptors;***
- e) The production and implementation of a Soils Management Strategy will now be secured through a new requirement in the DCO, dealing with the further detailed design of ecological mitigation. This is in addition to Requirements 2 Detailed Design, and 3 Code of Construction Practice. Highways England will consult Natural England on the wording of the new requirement. The commitment to producing a new DCO requirement in consultation with Natural England will be confirmed in the Highways***

***England/Natural England Statement of Common Ground.” (Page 36, Para 5.4.18)***

**Highways England response**

- 3.2.3 Highways England has included a new requirement for the securing of ecological mitigation in the latest draft of the DCO submitted at Deadline 4. Highways England would welcome further comment on the wording of this requirement.