

**A14 Cambridge to Huntingdon Improvement Scheme  
Development Consent Order Application**

**Representation by the Environment Agency**

**Deadline 14 – 6 November 2015**

Environment Agency  
Bromholme Lane  
Brampton  
Huntingdon  
PE28 4NE

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## **Deadline 14: Further Information requested by the Examining Authority**

### **1 Introduction**

- 1.1 This submission is provided in order to answer the questions stipulated within the Rule 17 letter (3<sup>rd</sup> November) and to clarify our most up to date position on the hydrological issues associated with the proposed A14 improvement scheme.
- 1.2 We have been corresponding with the applicant over the last week since the submission of our Deadline 13 response (30 October). We therefore need to reiterate the caveat within our previous response (section 2.5), of the risks relating to the audit trail for the provision of information. Our comments within this submission are in reference to the final Flood Risk Assessment, dated November 2015 and reference HE/A14/E/237.
- 1.3 We would also like to re-emphasize the need for more timely provision of information in which to inform the application for DCO (as previously stated within section 1 of our DL13 response).

### **2 Code of Construction Practice**

- 2.1 We have been liaising with the applicant and can advise that, in relation to 3.3 (of our DL13 response), we have agreed a revision to bullet point 10 within section 14.1.1 of the CoCP. The agreed wording is as follows;

*Within the operation vicinity of Borrow Pit numbers;*

- 1 – Brampton Brook,
- 2 - Between Buckden and Grafham road east of the A1
- 3 – West Brook, and
- 7 – Ellington Brook,

*The temporary storage of soil and materials within flood zone 3 will be controlled such that the net volume of excavation within the flood zone 3 is always in excess of any temporary stockpiling arising from such excavation. If soil and materials are to be temporarily stored within flood zone 2 they should be orientated so as not to obstruct flow and temporary floodplain compensation may be required subject to position, nature and duration. The exact location will be determined via written agreement with the Environment Agency prior to the commencement of works.*

- 2.2 We have had no response to our statement 3.2 (DL13) that the maintenance access for main rivers should be 9 metres (in accordance with byelaw distance). Therefore our concern that there is a potential conflict with what we would be prepared to approve under our protective provisions remains and we again request the applicant to delete this wording from the CoCP.

### **3 Flood Risk Assessment (FRA)**

- 3.1 This request was for an update on the minor outstanding model issues as previously identified within our previous submission. Our response this specific query is contained within sections 4 (DL13 reference 12.1) and 5.3 (DL13 reference 5.1), below.

#### **4 Additional DCO Requirement**

- 4.1 The FRA dated November 2015 now shows no increase in flood levels within Oakington village for the 1 in 100 year flood event with climate change. However due to time constraints we have been unable to review the model associated with this change in flood risk.
- 4.2 Due to the concerns regarding the village of Oakington specifically and the lack of time available to allow us to review the model changes and give our acceptance to them, we would welcome the inclusion of your suggested requirement (1, below), as set out in the recent Rule 17 letter. This will ensure that, through further assessment, there will be no increase in flood levels beyond those given within the approved FRA dated November 2015 (ref. HE/A14/E/237).
- 1) ***“Work on alternations to Oakington Brook and any associated watercourse as part of the Scheme must not commence until an addendum to the Flood Risk Assessment, certified under DCO article 41, and details of the alternations have been submitted to, and accepted in writing by the Environment Agency prior to commencement. The submitted addendum must extend to all areas associated with these works and show that flood risk to properties within the village of Oakington would not be increased beyond those levels stated within the FRA dated November 2015. Development must be carried out in accordance with these accepted details.”***

#### **5 Flood Risk Assessment**

- 5.1 This section gives our position on the outstanding model issues and FRA information set out within our Deadline 13 submission. This was as requested in the Rule 17 letter under the heading ‘Flood Risk Assessment’.
- 5.2 Several FRA sections and models have been updated and submitted to us since Deadline 13. The final FRA was submitted on 4 November 2015 reference HE/A14/E/237. Whilst the FRA as a whole is deemed appropriate, we had not received the final Annexes by 3pm on 4 November as tabled in section 33 of the FRA. We’ve therefore not had sufficient time to review these important sections of the FRA (including drawings, mapping, calculations and modelling reports). We are therefore put into a position of assuming there are no major changes or errors from those versions which we have previously assessed. We are prepared to accept the FRA and Annexes in good faith as being accurate. We expect full model reviews to be undertaken where necessary, at the detailed design phase.
- 5.3 Paragraph 5.1 Cock Brook – The modelling issue has still not been resolved. Whilst it is a minor issue we do need this to be investigated further though we are of the opinion that this can take place at the detailed design stage. This is possible with the inclusion of the requirement that was previously mentioned in our DL13 response under section 2.6. This ensures the limitation of flood level increases to those identified in the certified FRA (see section 5.5, below).
- 5.4 Paragraph 13.1 Beck Brook – This watercourse also had outstanding modelling issues which could have implications for flood levels due to the model not extending to an appropriate distance downstream from the scheme. We incorrectly understood the upstream land of the scheme (with increased flood levels) to be within HE ownership which is not the case. Therefore in line with the FRA, the landowners subjected to an increase in flood risk due to the scheme, need to be informed by the applicant. We have not seen evidence of this although it may be contained within Annex P of the FRA which we only received yesterday afternoon.

5.5 We consider a requirement would suffice in order to ensure that there will be no increase in flood levels from those stated within the certified FRA. This was earlier agreed within the applicant and stated in section 2.6 of our DL13 submission. We believe that this requirement is sufficient to secure our concerns although it should be amended to refer to the latest FRA, as follows:

- 2) ***'The authorised development must be carried out in accordance with the Flood Risk Assessment dated November 2015 reference HE/A14/E/237 including the mitigation measures detailed therein so that no part of the authorised development is predicted to result in any exceedence of the flood levels shown in the Flood Risk Assessment.'***

***This relates to the FRA as referred to in Deadline 14 submissions and we understand it to be considered a certified document covered by article 14.***

5.6 Due to the late submissions of data and insufficient time to again review every model and FRA, our acceptance of the scheme is based on the assumption that the dimensions of all the watercourse crossings set out in the FRA (HE/A14/E/237) are reflected within the relevant hydraulic models. Where this may not be the case, the above requirement (2) will be sufficient to secure any further works do not result in increases to flood levels due to changes in dimensions/crossings and or models.

## **6 Further revisions to FRA sections**

6.1 With regard to Utton's Drove Drain and Longstanton Brook, we have not had sufficient time to check whether the dimensions of the crossings set out in the FRA dated November 2015 are in accordance with the relevant hydraulic models we have already reviewed. This is due to these sections of the FRA being changed in the draft FRA that was submitted to us on 2 November. However, we have received confirmation from the applicant in an email of 3 November that the dimensions of the crossings set out in these sections of the FRA reflect those crossings represented in the relevant models.

### **6.2 Additional comments on revisions to the final FRA:**

These are comments for information and relate to inaccuracies as opposed to significant concerns. The conclusions in Table 10.7 of the FRA are acceptable.

6.3 Section 10 - River Great Ouse. We consider that the statement that '*...the properties will therefore not flood...*' in paragraph 10.4.1 is misleading as there is still a risk that the properties would flood during a more extreme flood event than the 1 in 100 year event (including an allowance for climate change). The properties will not be at risk of flooding as a result of the A14 proposal and this is therefore in compliance with the National Policy Statement on National Networks (an issue raised under section 7.3 of our DL13 submission).

6.4 We also consider that the predicted increase in peak water levels at Buckden Marina will result in a slight increase rather than a 'negligible' increase in flood risk to the properties in question, as stated in Paragraph 10.4.1. However, paragraph 10.4.1 does not appear to be in line with table 10.7, which indicates that the magnitude of the impact is 'minor adverse' rather than 'negligible' and the significance of the effect is 'slight adverse' rather than 'neutral'. We consider that the magnitude of impact and significance of effect as detailed in table 10.7 is appropriate.

**END**