

The Planning Inspectorate  
National Infrastructure Directorate  
Crown Building Cathays Park  
Cardiff  
South Glamorgan  
CF10 3NQ

**Our ref:** WA/2015/120640/02-L01

**Int. Party ID:** 10031668

**Your ref:** TR010019

**Date:** 02 October 2015

Dear Sir/Madam

**Summary Of Relevant Representations Previously Submitted 2 July 2015  
Development Consent Order Application M4 - Junctions 3-12 (Smart Motorway)**

We support the need for the M4 Smart Motorway to alleviate the traffic problems along the existing route and provide an efficient national transport link. However, we retain concerns relating to the Development Consent Order (DCO) as submitted. Our concerns primarily fall into the following 3 topics.

**Flood Risk and Mitigation** – The submitted information within the flood risk assessment (FRA) is inadequate. It does not fully assess the impacts of the scheme with regards to flood risk. Specifically, the applicant has not satisfactorily assessed the impacts of the proposed works in relation to upstream and downstream flood risk. Furthermore, they have not properly quantified the loss of floodplain storage and the associated compensation that may be required as a mitigation measure.

The applicant is proposing works within the floodplain without demonstrating that 'level for level' compensation is achievable. Therefore they has failed to demonstrate that there would not be an increase in flood risk elsewhere as a result of the proposed works as required by paragraph 5.99 of the NPS for National Networks (NPSNN).

Flood storage compensation is required to mitigate for loss of storage for all flood events up to and including the 1 in 100 year (1% AEP) with an allowance for climate change flood event.

The FRA explains that compensation will be provided for and assessed at the detailed design. However without further details from the outset, it is unclear if the applicant will be able to satisfactorily provide the required measures or how they proposed to implement/secure them through the DCO, phasing schemes and other associated documents.

**Works to Culverts** - The applicant is proposing to undertake work to existing culverts but has not specified the extent of works required. It is noted that they will extending



them but the supplied information does not explain the lengths or design criteria. If extensions to culverts are not designed appropriately then flood risk could be increased.

Additionally, if extensions to culverts are not designed appropriately, they can impact on biodiversity by reducing connectivity of habitats and the ability of aquatic species and water dependent species to migrate. Works to culverts provide an opportunity to improve connectivity where it is currently a barrier to migration. This is supported by paragraphs 5.25 and 5.33 of the NPSNN.

**Water Framework Directive** Compliance Assessment (WFDCA) - The WFDCA uses the legal baseline data (2009) but does not contain the more up to date monitoring data. The WFDCA also scopes out a large number of waterbodies without providing justification for this. Unless the WFDCA is based on up to date evidence and provides reasons for scoping in or out waterbodies we cannot be certain that it adequately assesses the proposal's impacts. At present we consider it is inadequate.

We also disagree with a number of the conclusions in Chapter 9 of the Environmental Statement which states that impact on ecology is neutral given that there will be loss of river habitats (channel bed, margins and banks) as a result of bridge widening and culvert lengthening.

Yours faithfully

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