

The Planning Inspectorate National
Infrastructure Planning
Temple Quay House
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Our ref: SO/2022/121848/03-L01
Your ref: Edwin Mawdesly
Date: 16 February 2022

Dear Sir/Madam

A57 LINK ROAD (PREVIOUSLY KNOW AS TRANS PENNINE UPGRADE PROGRAMME) – DEADLINE 4 (16 FEBRUARY2022)

Further to our responses to the written questions for the hearings 8-10th February, we can provide the following summary of our remaining concerns in relation to Flood Risk and Land Contamination.

REP3-005 and REP3-024 – Flood Risk

We have reviewed the revised FRA ref: TR010034/APP/5.5/Ver2 dated January 2022 (REP3-005 and REP3-024 in the document library).

The FRA has not been updated to reflect the latest fluvial climate change allowances that were introduced in July 2021. We acknowledge that a considerable amount of design work was undertaken by the applicant prior to the July 2021 update, and it is unfortunate that the updated guidance was introduced soon after the first draft of the FRA was made. The compensatory flood plain storage within the FRA is based on 1% AEP 35% climate change allowance which was consistent with the guidance prior to July 2021. The revised guidance for the Upper Mersey management catchment suggests at least 41% should be considered for compensatory floodplain storage and 53% if essential infrastructure is present in the area affected. We have advised that the river modelling that informs the risk assessment for the proposed crossing of the River Etherow and associated flood plain compensation be reviewed.

Section 4.6 – River Etherow

The river modelling undertaken for the River Etherow crossing is discussed in section 4.6 of the FRA. Our river modelling specialists within the Environment Agency's evidence and risk team have reviewed the applicant's model on two occasions in the past. The most recent review was in March 2020. Although the applicant had made some progress at that time to produce an agreeable model to use in the risk assessment, there were some remaining questions regarding the detail of the river model constructed. These were raised with the applicant in March 2020 and again in November 2021. To date we have received no further updates to the flood risk modelling since our last discussions with the applicant in a meeting on 25th November 2021. It is not clear at this time whether the applicant intends to address these points we have raised previously. We believe these detail issues in relation to the river modelling for the River Etherow should be addressed to ensure a robust assessment of flood risk. However, we would point out that requesting our river modellers to undertake a detailed river modelling review normally takes approx. 4 weeks.

Section 2.3.15 – Flood Risk Assessment

We also note from section 2.3.15 of the FRA that there is currently no information on the proposed surface water drainage strategy for the proposed development. This is more within the realm of Lead Local Flood Authorities in their role of assessing development drainage and surface water run-off. With any flood risk assessment, it would be normal practice to see outline information on anticipated receptors for drainage and how run-off rates would be controlled, preferably incorporating sustainable methods of drainage.

Land Contamination [REP1-041]

The Environment Agency have concerns, which have been raised with the Applicant previously, regarding the dewatering of the below ground level structures (cutting, underpasses etc.) in some locations could artificially dewater natural aquifer body.

These groundwater bodies are known to provide sole supplies of water (from an abstraction borehole) to several private dwellings. Dewatering of the aquifer would therefore deprive the owners and abstractors of these boreholes of water.

The applicant needs to have a thorough understanding of the environmental conditions prior to the drainage strategy being developed and the construction of the road commenced to be able to satisfactorily inform the Environment Agency.

We requested a survey of water features in the area (as detailed in email exchanges from (WJ Group – Environment Agency April -July 2021) [which would have included identification of abstraction boreholes; springs, wells, and other relevant boreholes; surface watercourses and other water features such as ponds, lakes, and reservoirs] but to date we don't appear to have received any of these details.

It is critical for the Environment Agency to undertake a thorough review of the technical reports to develop a detailed understanding of the natural environmental conditions, which are already complex and challenging so that we can work with the Applicant to develop a strategy that will address the need to drain and dewater the sub-ground level structures yet protect the natural environmental conditions and the established users of the groundwater resource.

The natural chemical conditions of the groundwater bodies may adversely impact the surface water network if the drainage/dewatering liquid were to enter them. This was raised with (WJ Group) on 7 May 2021, along with the known chemical condition of the aquifer which prevented the applicant from placing abstracted water into the surface water network and was given as written evidence to the inquiry on the morning of the 10th of February 2022 (Session 3; Time stamp 05:48 to 08:34).

We look to continue to work with the applicant to find a successful outcome that can be implemented and, where necessary subject to the controls of an environmental permit.

We note there is time set aside for further hearings 5th – 7th April. Therefore, can we request the ExA list a hearing to allow the issues of Flood Risk and Land Contamination to be addressed. If it appears everything has been resolved/addressed by that time, then the hearing will probably not be needed.

Yours faithfully

Mrs. SYLVIA WHITTINGHAM
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