

Via National Infrastructure Planning
On-line portal

Our ref: AE/2021/125987/02-L01,
20028402

Your ref: TR010037

Date: 06 December 2021

Dear Sir/Madam

**APPLICATION BY HIGHWAYS ENGLAND FOR THE A47/A11 THICKTHORN
JUNCTION PROJECT.**

**DEADLINE 4 SUBMISSION: COMMENTS ON DOCUMENT 6.3 ENVIRONMENTAL
STATEMENT APPENDIX 13.1 – FLOOD RISK ASSESSMENT REV 1**

We have reviewed the revised Flood Risk Assessment (FRA) (Rev 1) submitted by the Applicant at Deadline 3, reference REP3-009 (Tracked changes). We have the following comments to make at this time:

Considering section 8.2 Flood risk mitigation – Fluvial flood risk; we note that paragraphs 8.2.5 and 8.2.8 have been revised. The updated wording reflects the outputs of the additional survey and flood modelling work undertaken by the Applicant. The Applicant has used these outputs to further assess the potential for an increase in flood risk to the residential property downstream of the Scheme, close to Intwood Road (Crossing Cottage).

The previous FRA stated that there would be increases in flood depths of approximately 15mm in the vicinity of Crossing Cottage in the 100 year plus 65% climate change fluvial flood event. We note that following the further survey and modelling work, flood depth increases at the property in the revised FRA are now predicted to be less than 5mm, and that there will be no flooding above threshold level. Consequently, the FRA has been amended to remove reference to any property level protection being required as flood mitigation.

The Environment Agency undertook a detailed review of the updated hydraulic flood model, and we have confirmed to the Applicant that the model is appropriate for use in support of this proposal.

Paragraph 8.2.11 has also been reworded and additional figures C-16 and C-17 have been provided in Appendix C (Flood depth difference maps). We note that there are localised areas where flood depths are either increased or decreased to a major or moderate magnitude. The FRA states that this is a result of the “removal of

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the culvert throttle, stream realignment, extension to the A11 culvert and alteration to a farm access track”.

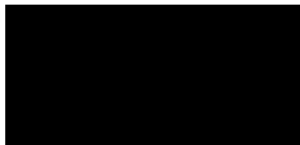
Paragraph 8.2.11 then states that the localised areas that are impacted are agricultural land and amenity areas, which are classed as ‘less vulnerable’ and ‘water compatible’ under the NPPF flood risk vulnerability classification.

This section then goes on to state “No ‘more vulnerable’ receptors, as defined under the NPPF flood risk vulnerability classification, are predicted to be adversely affected. As such the Proposed Scheme would not result in significant adverse impacts on flood risk and compensatory storage would not be required”.

The Environment Agency agree that the localised nature of these adverse impacts and the receptors impacted, mean that in this instance compensatory storage should not be required. We do suggest that if any of the adverse localised impacts are on third parties land that the Applicant engages with the affected land owners.

We note that paragraph 11.1.11 in the Conclusion section makes similar comments as paragraph 8.2.11.

Yours faithfully

A black rectangular redaction box covering the signature of Mr Martin Barrell.

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