

*Via National Infrastructure Planning
On-line portal*

Our ref: AE/2021/126552/01-L02
20028349

Your ref: TR010038

Date: 11 November 2021

Dear Sir/Madam

**APPLICATION BY HIGHWAYS ENGLAND FOR AN ORDER GRANTING
DEVELOPMENT CONSENT FOR THE A47 NORTH TUDDENHAM TO EASTON
PROJECT**

**DEADLINE 4 SUBMISSION: COMMENTS ON DOCUMENT 9.12 ADDITIONAL
INFORMATION FOR THE LEAD LOCAL FLOOD AUTHORITY AND THE
ENVIRONMENT AGENCY**

We have reviewed Document 9.12 Additional Information for the LLFA and EA [REP3-026] submitted at Deadline 3, and wish to make the following comments. We would also highlight that discussions with the Applicant are ongoing for all issues outlined below.

Oak Farm

Section 2.2 of the document refers to the compensatory flood storage on the Oak Farm watercourse. Section 2.6 refers to a meeting to be had with the landowner affected by the increased flood storage upstream of the Oak Farm culvert. We have advised the Applicant that we would wish to be updated on the outcomes of that meeting, and see confirmation that the landowner is accepting of the increase in flood risk.

Hockering culvert

Section 2.7.2 and 4.1.1 of the document refer to new 1D-2D hydraulic flood risk modelling and an updated model report for the Hockering culvert. We will await these to be provided to us for review. Section 2.10.5 determines that 11m³ of flood storage is lost in the 1% (1 in 100) annual exceedance probability event, plus 35% allowance for climate change on an ordinary watercourse. In section 2.10.6 the Applicant has proposed that no flood compensatory storage area is provided, stating a "lack of meaningful detriment, small loss of floodplain storage and the improved confidence in the hydraulic model".

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Ideally we would like to see this lost flood storage compensated for. The individual effect of not carrying out compensation works for the loss of floodplain storage may appear to be minor or insignificant, but the cumulative effect of such proposals can result in more significant impacts.

At this location there is an existing road and culvert approximately 200 metres upstream, and the project would result in a new road and culvert immediately downstream. These constrictions on fluvial flows may limit the possibility of any adverse cumulative effects arising from not providing compensatory storage for the 11m³ lost at this location.

We have requested that the Applicant provides further information on the reasons for not providing compensatory storage, and further detail on what happens as a result of 11m³ of flood storage being lost. For example, is that volume retained within the application site boundary with the new culvert downstream regulating the flow rates? Or if not, does the 11m³ of lost flood storage result in any offsite impacts and where are those impacts?

We understand that the Applicant intends to submit further information for Deadline 5.

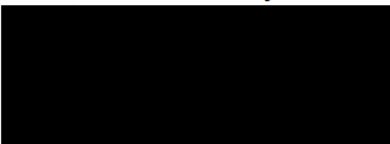
River Tud Compensatory storage

The Applicant has provided further detail on the River Tud compensatory storage proposals, set out in section 3.1.1. We expect to be consulted on the detailed design of the River Tud compensatory storage proposals under Requirement 4 Environmental Management Plan, as stated in 3.1.2. From the information provided, we are satisfied that the Applicant has adequately demonstrated that in principle appropriate flood storage compensation can be delivered at this location.

River condition surveys

We note the inclusion in the document of sections 5, 6 and 7, which outline the work being undertaken by the Applicant to resolve our concerns regarding the potential ecological impacts on the River Tud, Oak Farm and Hockering watercourses. We look forward to reviewing the outputs from these surveys and agreeing with the Applicant any further measures required.

Yours faithfully



MR MARTIN BARRELL
Sustainable Places - Planning Specialist

