

*Via National Infrastructure Planning  
On-line portal*

**Our ref:** AE/2021/126554/01-L01  
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 9.13 OUTLINE  
WATER MANAGEMENT AND MONITORING PLAN**

We have reviewed the outline Water Management and Monitoring Plan (WMMP) submitted at Deadline 3 [REP3-027], an Annex to the Environmental Management Plan. We note that the WMMP is to set out the construction measures to prevent the risk of pollution and contamination to ground and surface water, and will remain a live document subject to regular review throughout the construction period.

Overall, we are generally satisfied that the outline WMMP for construction drainage is suitable. We will further review the detailed proposals, including details and locations of the final design specifics for any temporary infiltration ponds, silt traps, screens etc., under Requirement 4. We have some specific comments on this document, included below.

**Section 3: Consents and Permissions**

We note that Table 2 appropriately highlights the circumstances in which a Flood Risk Activity Permit may be required, although this requirement is not referenced in the preceding text.

Table 2 also outlines when an abstraction licence may be required for construction dewatering. We would re-emphasise that dewatering can only be undertaken without a licence at the rates quoted if the dewatering works for the whole scheme will last for a period of 6 consecutive months or less. If dewatering will occur over a longer time frame, the maximum rate at which dewatering can be undertaken without an abstraction licence is 20 m<sup>3</sup>/d.

**East Anglia area (East) - Icen House**

Cobham Road, Ipswich, Suffolk, IP3 9JD

General Enquiries: 08708 506506 Fax: 01473 724205

*Weekday Daytime calls cost 8p plus up to 6p per minute from BT Weekend Unlimited.*

*Mobile and other providers' charges may vary*

Email: [enquiries@environment-agency.gov.uk](mailto:enquiries@environment-agency.gov.uk)

Website: [www.environment-agency.gov.uk](http://www.environment-agency.gov.uk)

We would also highlight that Table 2 incorrectly refers to the Environment Agency as the 'Environmental Agency'.

### Annex 1 Water Management Proposals

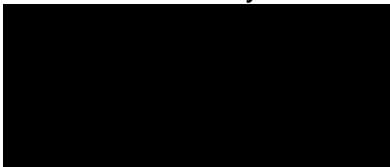
Regarding Item 3 in the table, we would highlight that the requirement to not change the existing hydraulic continuity should also be a consideration when designing piling.

In respect of Items 3 & 4, the use of the term 'hardstanding' should be reconsidered or more clearly defined. It is not clear whether the term relates to inherently permeable or impermeable surfacing? Item 4 refers to "a hardstanding area" for storage of oils, fuels etc. which is to be bunded. We would expect this 'hardstanding' to be impermeable. However, the refuelling, maintenance and concrete batching sites are specifically described as being on "*impermeable* hardstanding with drainage treated appropriately".

Regarding Item 9, regular monitoring of groundwater quality will also be required in areas where proposed activities have the potential to adversely impact upon it.

As above, the Environment Agency is incorrectly referred to as the 'Environmental Agency' in Annex 1.

Yours faithfully



**MR MARTIN BARRELL**  
**Sustainable Places - Planning Specialist**

