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The Planning Inspectorate Our ref: NA/2020/115279/01-L01

Room 3/19A **Your ref:** TR010059

Temple Quay House (2 The Square)

Temple Quay

Date: 22 December 2020

Bristol Avon BS1 6PN

Dear Sir/Madam

A1 IN NORTHUMBERLAND: MORPETH TO ELLINGHAM: REPRESENTATIONS IN RESPONSE TO PRELIMINARY MEETING 15 DECEMBER 2020. PROCEDURAL DEADLINE B. MORPETH TO ELLINGHAM

During the preliminary meeting held on 15 December 2020, it was highlighted that the Applicant had submitted a document outlining a number of proposed changes to the Development Consent Order (DCO) application. It is noted that these changes have not yet been accepted by the Examining Authority.

We wish to highlight to the Examining Authority our concerns relating to the bridge design over the River Coquet, as outlined in the document titled 'Summary of Proposed Changes to Application Version 2'. These changes are considered to be significant changes, and thus we have some concerns with the proposed changes. We have concerns with the following design changes:

Proposed change 1: alteration of the location of the southern pier of the bridge: moving it 2m closer to the river's edge.

This will have flood risk, ecology and geomorphology and Water Framework Directive (WFD) impacts, which will need to be assessed as part of the DCO. This may include the need for additional surveys to be undertaken.

Proposed change 2: installation of temporary bridge and river training works for approximately 15months)

This is a significant change and consequently further flood risk, ecology, WFD and geomorphology information will need to be submitted as part of the DCO, including additional design information for the temporary bridge and river training measures. Additional surveys may need to be undertaken.

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The design of the temporary bridge will need to be supported with hydraulic modelling, in order to ensure that there is no increase in flood risk elsewhere. The hydraulic model will take between 6-8 weeks to review. The Flood Risk Assessment will also need to be updated to reflect the proposed changes to the permanent bridge structure (bridge pier locations) and the introduction of a temporary bridge and increased in-river works.

Any river training should not damage existing geomorphological features of value at the site or downstream. Any changes will need to be monitored and if impacts are experienced, they must be compensated for.

Proposed change 3: the installation of bank protection (potentially rock armour) on the north bank of the river to address the risk of fluvial erosion and instability of the sloping land north of the riverbank.

This will have flood risk, ecology and geomorphology impacts, which will need to be assessed as part of the DCO. The proposed permanent use of bank protection may destroy/severely damage the bank habitat and geomorphological process along the River Coquet.

Rock armour is not favourable due to its visual and geomorphological impact and the limitations it can pose on ecology. Furthermore it is also unlikely to have a lifespan to match that of the bridge. The River Coquet is largely unmodified and any increase in the heavily modification (as classed under WFD) will need to be compensated for, e.g. the removal of rock armour and renaturalisation in other areas.

Proposed change 4: the addition of rock armour on the southern bank of the river for erosion control purposes where it is not clear where any significant erosion exists.

This will have flood risk, ecology, WFD and geomorphology impacts, which will need to be reassessed as part of the DCO. Additional geomorphological surveys may need to be undertaken and additional mitigation measures provided. Local factors need to be considered when assessing the need for rock armour, such as bedrock present at the pier location or whether green methods can be utilised.

Proposed change 5: Larger area for construction required on the north bank, increasing pollution risk to River Coquet

A larger area of exposed soils on the northern bank will result in a greater risk of the creation and accumulation of site water with a high sediment load. Due to the nature of the works, there will be limited area to treat the water through standard methods such as settlement lagoons. A bespoke plan for treating the anticipated volumes and chemistry of the water should be developed, this must take into

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account any permits that may be required taking into account the designated receiving waters if using chemical dosing.

Proposed change 6: installation of two rows of spaced piles to the north side of the proposed pier location and a third row to the south side

This could potentially create or a break groundwater pathways along the River Coquet. Therefore, the risk of the groundwater will need to be reassessed as part of the DCO and mitigation may need to be provided.

Deadlines 1, 2 and 3

The Environment Agency would support amendments to the timescales for deadlines 1 to 3, as outlined at the preliminary meeting.

Please do not hesitate to contact me if you have any questions regarding this letter.

Yours faithfully

Lucy Mo		
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