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Our ref: NA/2020/115279/05-L01
Your ref: A1 in Morpeth
Date: 11 May 2021

Dear Sir/Madam

A1 IN NORTHUMBERLAND: MORPETH TO ELLINGHAM: DEADLINE 7 SUBMISSIONS.

Please find enclosed our written representations for Deadline 7 for this Development Consent Order (DCO) on behalf of the Environment Agency (EA).

If you have any questions or require any clarification on the points below, please do not hesitate to contact me.

Yours faithfully

██████████
Planning Technical Specialist - Sustainable Places

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**A1 IN Northumberland: Morpeth to Ellingham Development Consent Order
Application Planning Inspectorate Reference: TR010059**

**Summary of Written Representations - on behalf of the Environment
Agency (EA)**

**Deadline 6 Submission - 7.24 Applicant's Response to Deadline 5 and 5a
Submissions [REP6-040]**

Ref. No 138, Appendix iii- Indicative Longdike Burn Proposals

We welcome the inclusion of Appendix iii Indicative Longdike Burn Proposals. This however confirms our concerns that delivering significant improvements along this reach of the Longdike Burn, to compensate for the culverted watercourses is unrealistic. The reach is largely unmodified, surrounded by unmanaged pasture, and it is questionable whether marginal planting is necessary or appropriate. It is suspected that deer grazing is suppressing natural regeneration along the burn.

We believe that although some planting is likely to assist the aging woodland present along the burn, deer management is likely to provide the greatest benefits. Without this management, the planted shrubs may fall prey to the browsing deer. Therefore, we do not feel the proposed plans offer any substantial compensation. In order to provide suitable compensation for the culverting of the watercourses associated with the scheme, it will be necessary to consider off site options.

General comments on the schemes reported loss of watercourses and the need for meaningful compensation

The loss of river watercourses through culverting, whether assessed as significant or not, still amounts to 427m, plus the impacts of the construction easement which will likely result in greater habitat loss or disturbance, both temporary and permanent. Compensating for the loss of watercourses by improving other watercourses through riparian planting is not direct like-for-like compensation. However, given that additional watercourse lengths could not be gained through the scheme, then increasing the river biodiversity and value elsewhere is the next best solution. We request that the Applicant seeks to deliver or support a meaningful compensation package elsewhere on the effected watercourses which are locally more degraded, unlike the Longdike Burn in the DCO which is in a relatively good state in comparison to many other stretches within its catchment.

Ref. No 78, Appendix i Geomorphological Map

The map only covers the area of the new bridge, and the reach directly adjacent to it. The map should include coverage for the whole reach included within the geomorphology walkover survey (between Felton weir, and Otter House). We request that geomorphology matters are pulled together to form a section in the updated geomorphological assessment. This should include a narrative on the



stability of the gorge slopes, the interaction with the river and why the Applicant believes the proposed works to the north and south banks will not result in a deterioration of the river is pulled together to form a section of the updated geomorphological assessment.

Deadline 6 Submission - 7.3 Updated Outline Construction Environmental Management Plan (Tracked) - Rev 5a [REP6-026]

General Comments

Our written representations submitted on 4 May 2021 for Deadline 6 are still applicable and are included in this response. We have also included some additional comments to reflect the updates to the outline CEMP in relation to Table 3-5 Environmental Statement Addendum – Stabilisation Works for Change regarding the provision of compensation.

Deadline 6 Submission - 7.26.4 Applicant's Written Summaries of Oral Submissions to Hearings - Appendix F - Otter Position Statement [REP6-048]

Following a site visit, the EA provided the Applicant with pictures and grid references of 7 confirmed spraining locations within 200m of the scheme. We request that the Applicant updates their Otter Position Statement and provides detailed justification regarding why mammal shelves cannot be fitted within the Shipperton Burn culvert, and would urge the Applicant to explore all options and solutions to barriers inhibiting installation.

Deadline 6 Submission - 7.6C Statement of Common Ground with Environment Agency - Rev 2 [REP6-032]

We are working with the Applicant to address the issues outlined in this letter and in our previous correspondence.

Update on hydraulic model review

The EA completed its review of the stage 1 hydraulic model. The hydraulic model is considered to be largely appropriate. However, we have identified some minor points for consideration and requested clarity on a few issues. We are also in the process of reviewing the stage 2 hydraulic model (post development modelling).

**A1 IN Northumberland: Morpeth to Ellingham Development Consent Order
Application Planning Inspectorate Reference: TR010059
EA Written Representations**

**Deadline 6 Submission - 7.24 Applicant's Response to Deadline 5 and 5a
Submissions [REP6-040]**

Ref. No 138, Appendix iii- Indicative Longdike Burn Proposals

We welcome the inclusion of Appendix iii Indicative Longdike Burn Proposals. This however confirms our concerns that delivering significant improvements along this reach of the Longdike Burn, to compensate for the culverted watercourses is unrealistic.

Appendix iii does not provide plans for nutrient management measures or bankside stabilisation or the area of aquatic planting. This aquatic planting may not be suitable given the site already has potential marginal planting. However, this could not be confirmed due to the time of year and cold weather in spring 2021

During a recent walk over of the reach, it was noted that mature alder were semi-continuous along the whole reach. A number of these trees had fallen into the channel, adding greater complexity to an already diverse channel. The reach is largely unmodified, surrounded by unmanaged pasture, and it is questionable whether marginal planting is necessary or appropriate. Tree cover along the burn is dominated by mature and post mature alder, with limited younger trees available to replace these older trees.

Natural regeneration was noted within pockets of the site, and it is suspected that deer grazing is suppressing natural regeneration along the burn. We believe that although some planting is likely to assist the aging woodland present along the burn, deer management is likely to provide the greatest benefits. Without this management, the planted shrubs may fall prey to the browsing deer. Therefore, we do not feel the proposed plans offer any substantial or approach compensation. In order to provide suitable compensation for the culverting of the watercourses associated with the scheme, it will be necessary to consider off site options.

General comments on the schemes reported loss of watercourses and the need for meaningful compensation

The loss of river watercourses through culverting, whether assessed as significant or not, still amounts to 427m, plus the impacts of the construction easement which will likely result in greater habitat loss or disturbance, both temporary and permanent. As such, if the Applicant fails to compensate adequately and meaningfully for this loss, they are potentially failing in their general duty to conserve biodiversity under the Natural Environment and Rural Communities Act 2006.



Compensating for the loss of watercourses by improving other watercourses through riparian planting is not direct like-for-like compensation. However given additional watercourse lengths could not be gained through the scheme, increasing the river biodiversity and value elsewhere is the next best solution. We request that the Applicant seeks to deliver or support a meaningful compensation package elsewhere on the effected watercourses which are locally more degraded, unlike the Longdike Burn which is in a relatively good state in comparison to many other stretches within its catchment.

Ref. No 78, Appendix i Geomorphological Map

The map only covers the area of the new bridge, and the reach directly adjacent to it. The map should include coverage for the whole reach included within the geomorphology walkover survey (between Felton weir, and Otter House)

We welcome the narrative regarding the role the slopes of the gorge (River Coquet) have and are continuing to play in the supply of sediment, channel planform and flow dynamics. We request that the responses regarding this topic are pulled together to form a section in the updated geomorphological assessment. In particular, the updated geomorphological assessment should include a narrative on the stability of the gorge slopes, the interaction with the river and why the Applicant believes the proposed works to the north and south banks will not result in a deterioration of the river is pulled together to form a section of the updated geomorphological assessment.

Deadline 6 Submission - 7.3 Updated Outline Construction Environmental Management Plan (CEMP) (Tracked) - Rev 5a [REP6-026]

General Comments

Our written representations submitted on 4 May 2021 for Deadline 6 are still applicable and are included in this response. We have also included some additional comments to reflect the updates to the outline CEMP in relation to Table 3-5 Environmental Statement Addendum – Stabilisation Works for Change regarding the provision of compensation.

CEMP and 7.9.1.1 Culvert Mitigation Strategy - Rev 1 [REP5-022]

It is unclear what the hierarchy is between the CEMP and 7.9.1.1 Culvert Mitigation Strategy - Rev 1 [REP5-022] as there is a significant degree of overlap between the two documents. Both documents independently contain important details that are not apparent in the other document. We would welcome clarification on this.

Compensation and mitigation

Within the scheme wide section of the outline CEMP, we request that specific acknowledgement of and the need for mitigation and compensation for the loss and damage/disturbance to the many watercourses crossed by the scheme is clearly stated. This needs to be independent of, but as detailed as and on a par with actions like S-B1, S-B2 or S-B20.



We are still assessing whether the measures presented to compensate and mitigate for the impact of the scheme on the crossed watercourses is adequate. Aside from the Water Framework Directive, the EA has legal duties under the Environment Act 1995, the Water Environment (Water Framework Directive) Regulations 2017 and the Natural Environment and Rural Communities Act 2006 to ensure that watercourses are protected and enhanced for the benefit of present and future generations.

The current package of compensatory works includes 1240m (a combined total of riparian planting outlined in .9.1.1 Culvert Mitigation Strategy - Rev 1 [REP5-022]) of riparian planting to compensate for the loss of 427m of watercourse. The loss of 427m is considered a minimum figure as it only covers the length of the culvert and does not cover the easement either side of the new or extended crossings. Furthermore, it does not cover any vegetation removal and bank re-profiling that may be required to allow construction to take place. Nor does not consider the influence of the culvert on river processes beyond the footprint of the structure itself.

Watercourses such as Floodgate Burn or the River Lyne where substantial riparian woodland already exists, the loss and impact is not clearly represented and is expected to be much larger than 427m. Much of the claimed riparian planting is where existing riparian woodland already exists on these burns. The Applicant must clearly demonstrate not only the loss of watercourse due to culverting, but also the length of existing riparian habitat lost.

We require for the mitigation measures to be clearly stated, a commitment to the establishment of viable, sustainable natural beds within the key culverts and a comprehensive package of compensation measures. This should be clearly marked on a relatable mitigation and compensation plan, and should not be solely dependent on riparian planting.

The above comments are also applicable to 7.9.1.1 Culvert Mitigation Strategy - Rev 1 [REP5-022].

Specific comments on individual actions

Otters

We welcome the inclusion of additional measures within the CEMP regarding otters. However, mitigation measures for commuting otters needs to be incorporated into the outline CEMP.

Action S-GS4

This does not align with the updated measures in S-W1 in relation to the temporary surface water drainage strategy.



Actions S-W1 or S-W8 We would like to see reference made to the requirement to report any pollution incidents to the water environment to the EA's Pollution Incident Hotline (0800 80 70 60).

Action S-W1, (b),

We welcome the statement to use seeded biodegradable fibre matting encourage re-vegetation of disturbed watercourse banks. This action should be updated to include a commitment to consider and use green (soft) and hybrid engineering solutions as alternatives to hard solutions for erosion control, scour management, wing walls etc.

Action S-W6

We welcome the commitment to the inclusion of gravel beds throughout the length of the new culverts. This commitment should be further strengthened to include minimum natural bed depths and minimum water depths (to support migratory fish species) for the new culverts. The Scottish Environmental Protection Agency's Good Practice guide for River Crossings provides a useful series of recommendations reflecting different sizes of culverts:

- For culverts less than 1.2 m diameter or height (internal height) the invert should be buried at least 15 cm below the natural bed level.
- For culverts 1.2 - 1.8 m diameter or height (internal height) the invert should be buried at least 20 cm below the natural bed level.
- For culverts greater than 1.8 m diameter or height (internal height) the invert should be buried at least 30 cm below the natural bed level.

CIRIA's Culvert, Screen and Outfall Manual is slightly more rigid and states that the depth of a natural bed is between 300-600mm.

We welcome the inclusion of a hydromorphologist for the detailed design of the culverts. However, table 2.1 (environmental consultant – designer) implies a generalist role. This table should be updated to reflect the use of a hydromorphologist.

Table 3-a - REAC Referencing System, S-W100

It is important that the riparian planting is not just stated as compensation for the loss of watercourses, but also for the loss of existing riparian woodland. Compensating for the loss of watercourses by improving other watercourses through riparian planting is not direct like-for-like compensation. However given additional watercourse lengths could not be gained through the scheme, increasing the river biodiversity is the next best solution. We recognise that the DCO boundary limits the opportunities for compensation. Therefore, we request that the Applicant considers the provision off site measures.

Action B-B5 a) and b)

We welcome the commitments outlined in Action B-B5 a) and b).



A-B2 and A-B11

These measures require updating following the Environment Agency's discovery of several otter spraints on the Shipperton Burn within 200m of the scheme, including spraints just upstream of the existing road boundary.

A-B7 and A-W7

The design of the new channel should be based around the predicated discharges rather than existing conditions. In accordance with paragraphs 5.23 and 5.33 of the National Policy Statement for National Networks (2014), the design objectives should maximise the opportunities presented through the design of the new channel. The aim, as far as possible, accepting the local constraints, should be to re-establish the natural functioning of the channel, through naturalised flows, sediment transfer, patterns of erosion and deposition. Measures such as these will provide the most sustainable long term solutions delivering multiple benefits including climate resilience, sustainable flood management, improved biodiversity, reduced maintenance costs.

A-W2

Given the nature of the upstream catchment and the size of the culverts under the A1 (900mm diameter), the proposed culverts appear significantly over sized. Consideration should be given to downsizing these 2 culverts and reducing the depth of any natural bed to 150mm. This would reduce the scheme's carbon footprint.

A-W6 (Priest's Bridge Culvert)

There is insufficient information to determine whether the design of this culvert is appropriate to address the ecological requirements of the River Lyne. The River Lyne is morphologically active with sufficient energy for natural adjustment, localised sinuosity and bank erosion and sediment deposition processes operating.

The existing culvert appears to be hindrance to fish passage due to the wide shallow flat bed which will promote high flow velocities. The inclusion of baffles within this structure is welcomed, and will help mitigate the fish passage issues associated with this structure.

The inclusion of a low flow channel within the proposed culvert is supported. However, it needs to be designed to enable fish to pass. The table below is an extract from CIRIA's Culvert, Screen and Outfall Manual and provides design criteria for flow velocities and water depths through culverts.



Table 9.3 - CIRIA's Culvert, Screen and Outfall Manual

Table 9.3 Design criteria for culverts to enable fish to pass (from Armstrong et al, 2016)

Parameter		Coarse fish roach, dace, chub etc smaller than 250 mm	Brown trout and coarse fish up to 250 mm and large coarse fish 250 – 500 mm	Sea trout, brown trout up to 250 – 500 mm and larger coarse fish greater than 500 mm	Salmon and large sea trout greater than 500 mm
Maximum flow velocity through the culvert (m/s) ^(a, b, c)	Length <20 m	1.1 m/s	1.25 m/s	1.6 m/s	2.5 m/s
	Length 20 m to 30 m	0.8 m/s	1.0 m/s	1.5 m/s	2.0 m/s
	Length >30 m	0.5 m/s	0.8 m/s	1.25 m/s	1.75 m/s
Minimum water depth in culvert ^(d)		100 mm	100 mm	150 mm	300 mm
Maximum water level drop at outlet ^(e)		100 mm	200 mm	300 mm	300 mm
Minimum gap between screen bars		100 mm	100 mm trout 150 mm coarse fish	150 mm	200 mm

Notes

- a Mean velocity of cross-section (there will be areas of lower and higher velocity).
- b The velocities for the shorter culverts approximate to the burst speed achievable by each species at 5°C, and the velocities for culverts > 30 m approximate to the cruising speed.
- c These velocities should not be exceeded at any flow within the passage design flow range.
- d Minimum depth acceptable at the lower end of the passage design flow range.

This would mean an average maximum flow velocity of 0.8 m/s during the passage design flow range, with a minimum of depth of 100-150mm. Given the length of the culvert, and that the River Lyne is morphologically activity, we recommend a minimum natural bed depth of 300mm within the low flow channel.

A-W7 (Fenrother Burn)

The design of the new channel should be based around the predicated discharges rather than existing conditions. The design objectives should maximise the ecological opportunities presented through the design of the new channel. The aim, as far as possible, accepting the local constraints, should be to re-establish the natural functioning of the channel, through naturalised flows, sediment transfer, patterns of erosion and deposition. Measures such as these will provide the most sustainable long term solutions delivering multiple benefits including climate resilience, sustainable flood management, improved biodiversity, reduced maintenance costs.

A-W8 (North and South Fenrother Burn)

Given the nature of the upstream catchment and the size of the existing culvert under the A1 (500mm diameter), the proposed culverts appear significantly oversized (1.5x1.25m twin box and 3x1.75m box). Could these 2 culverts be downsized given the limited scope for fish to be present the depth of any natural bed could be reduced to 150mm?

A-W9 (Causey Park Culvert)

The photographs of the burn suggest flows sufficient to support fish, while the planform upstream and downstream of Causey Park suggest a morphologically



active channel with sufficient energy for natural adjustment, localised sinuosity. We recommend the inclusion of a low flow channel within the culvert designed using the principles outlined for A-W6.

A-W10 (New Houses Farm Culvert)

This action refers to the re-aligned channel and not the culverts. It needs to be reworded to reflect this. Design principle for the new channel should align with principles outlined in A-W7 and A-B7. Given the Applicant's ambition to reduce the levels of embedded carbon, consideration should be given to the use of alternative materials such as polyethylene (high density) [HDPE] for this structures.

A-W12 (Earsdon Burn culvert)

Given that this culvert is on a farm access track, it is unclear why the additional cost of a mammal ledge is considered necessary for this structure.

This action also refers to comments made for A-W9. Unless the Applicant believes that a smaller culvert can be used as this structure is upstream of the New Houses Farm tributary, we recommend that this action is renumbered A-W11 to reflect the south to north trend.

A-W11 (Bockenfield Bridge/Culvert)

We require justification for the need of scour protection, whether it can be designed out, and whether green or hybrid solutions can be used as an alternative to a hard engineered solution.

It is unclear why the mitigation measures for the Burgham Culvert and the proposals for the riparian improvements to the Longdike are not included in the outline CEMP. For the Burgham Culvert it is recommended that an option to raise water levels above the lip of the downstream culvert are also included in the package of works to improve fish access. This will benefit species such as eel and lamprey, will broaden the window when migration is possible, and will be a more robust and long term solution.

A-B30

This needs to be amended to reflect the comments made above.

Actions A-B40

We have not yet been presented with any justification for the suitability of these works and are wary about this being claimed as compensation without any evidence that these issues are present within the proposed area or are in fact causing a degradation of the watercourse. We welcome that this action will be developed in partnership with the EA.

It is noted that Action A-B40 makes reference to compensation for the direct loss of approximately 35m of the Longdike Burn as part of the Bockenfield Culvert (12) extension. Document 7.24.2 Applicant's Response to Deadline 5 and 5a



Submissions [REP6-040], Appendix iii-Indicative Longdike Burn Proposals makes reference to compensation measures such as ‘riparian enhancements with native riparian tree planting, berm enhancement potential for planting with wetland tolerant and amphibious vegetation and aquatic macrophytes planting’. The outline CEMP makes reference to the inclusion of nutrient management measures to address adverse impacts of run-off from agricultural land and bankside stabilisation. However, there is no mention of measures of this nature in 7.24.2 Applicant’s Response to Deadline 5 and 5a Submissions [REP6-040].

Table 3-5 Environmental Statement Addendum – Stabilisation Works for Change Request

REAC Ref SW-B2 & B3

We welcome the commitment to restore the riverbed to pre-works comparable condition. However, we require the submission of information regarding how the baseline conditions will be established; how the restoration will take place; what the risks are and whether any aftercare/monitoring will be implemented.

This measure states it should provide suitable sheltering habitat for aquatic invertebrates and juvenile fish and naturally become vegetated over time. Although some revegetation may occur, very large rock armour as proposed will be a highly limiting factor for the development of bankside habitat and will vegetate far less than the existing, mostly natural banks present. As such, compensation should be provided and a commitment as such should be recorded within the outline CEMP. This comment is also applicable to REAC Ref SAW-B3.

REAC Ref SW-B4

The rock armouring of the riverbanks will permanently fix the riverbed and banks, restricting and influencing the form and function of the river well past 125 year lifetime of the bridge. The proposed scour protection using large rock armour cannot replicate the heterogeneous and dynamic nature of the existing bank. Rivers are rarely stable for extended period’s time. Over time the rock armour will vegetate up, however it is unlikely to be as diverse as the lost natural bank. As such, it is considered that compensation is required and a commitment as such should be recorded within the outline CEMP once or if agreed.

REAC Ref SW-W5 / SAW-B7 / SAW-W5

Chemical Dosing of silt laden water may be required due to the steep slopes, exposed soils and heavy construction traffic that will generate contaminated water during or after rainfall events. Settlement lagoons require a substantial area to allow sediments to settle, and often due to the chemical composition of the soils, finer particles may remain suspended. The area required for these ponds is unlikely to be available due to the minimal working area designed to reduce the ancient woodland loss. As such, lamella tanks and chemical dosing are likely to be required and the relevant permits and permissions from the EA and Natural England must be sought.



REAC Ref SW-W2

We welcome the commitment to minimise the extent of hard engineered erosion protection. It needs to be acknowledged, that while grey/green solutions may allow more diversity in the revegetation, it still fixes the river channel and bed to its current position. The bank protection measures in combination with the slope stabilisation will decouple the channel from the gorge sides, thereby preventing the supply of sediment to the channel. Flow and channel features will become less varied, thereby reducing the number and diversity of the species able to utilise the area.

The proposals will also influence channel response and development beyond the footprint of the works (both up and downstream), thereby extending the potential range of deterioration. By restricting or preventing these infrequent, yet clearly active slope processes, and by preventing the river from responding to them, there will be a progressive, long term deterioration of the channel, and the species it supports. This risk still needs to be assessed, and if the impact is deemed to be locally significant, a commitment to either mitigate or compensate needs to be recorded in the outline CEMP.

REAC Ref SW-W3, SAW-W1 & W2

We welcome the design and mitigation measures associated with the stabilisation works. It needs to be acknowledged, that while grey/green solutions may allow more diversity in the revegetation, it still fixes the river channel and bed to its current position.

REAC Ref SW-W4 & SAW-W3

We welcome the commitment to protect and when necessary map and reinstate in channel sedimentary features.

REAC Ref SW-W7 & SAW-W6

We welcome the proposals to use a suitably qualified clerk of works to monitor and record bed and bank changes during the construction phase. We would request that there is a subsequent action/measure within the outline CEMP, if the monitoring highlights channel changes, out with those predicted in the geomorphology assessment.

REAC Ref SAW-B2 & B3

We support the commitment to minimise the extent of hard engineered erosion protection. It needs to be acknowledged, that while grey/green solutions may allow more diversity in the revegetation, it still fixes the river channel and bed to its current position. The bank protection measures in combination with the slope stabilisation will decouple the channel from the gorge sides, thereby preventing the supply of sediment to the channel. Flow and channel features will become less varied, thereby reducing the number and diversity of the species able to utilise the area. The proposals will also influence channel response and



development beyond the footprint of the works (both up and downstream), thereby extending the potential range of deterioration.

By restricting or preventing these infrequent, yet clearly active slope processes, and by preventing the river from responding to them, there will be a progressive, long term deterioration of the channel, and the species it supports. This risk still needs to be assessed, and if the impact is deemed to be locally significant, a commitment to either mitigate or compensate needs to be recorded in the outline CEMP.

REAC Ref SAW-W1

Although some revegetation may occur, very large rock armour as proposed will be a highly limiting factor for the development of bankside habitat and will vegetate far less than the existing, mostly natural banks present. Therefore, compensation is required and a commitment as such should be recorded within the outline CEMP.

REAC Ref SAW-B6

We request that similar measures/actions regarding the mapping and reinstatement of the riverbed are applied to the “southern access works” as are being applied to the “slope stabilisation works”.

Deadline 6 Submission - 7.26.4 Applicant's Written Summaries of Oral Submissions to Hearings - Appendix F - Otter Position Statement [REP6-048]

Section 1.3.7 states that further possible evidence of otter adjacent to the study area for Part B was provided by the EA at a meeting on 30 April. The EA provided pictures and grid references of 7 confirmed spraining locations within 200m of the scheme were shared with the Applicant.

We await further details of the precise reason why a mammal shelf cannot be fitted within the culvert at Shipperton Burn, and would urge the Applicant to explore all options and solutions to barriers inhibiting installation. Shipperton Burn provides a good habitat for otters. However, the culvert is a fully concrete structure with a smooth base with a relatively steep incline and as a result, water velocities were relatively high. As such, it is anticipated that given the uniform and smooth channel base, in high flows the culvert would be impassable to otter. In light of the clear evidence of use by otters and poorly designed culvert, we request the Applicant updates their Otter Position Statement and provides detailed justification regarding why mammal shelves cannot be fitted within the Shipperton Burn culvert.

Deadline 6 Submission - 7.6C Statement of Common Ground with Environment Agency - Rev 2 [REP6-032]

We are working with the Applicant to address the issues outlined in this letter and in our previous correspondence.



Update on Hydraulic Model Review

The EA completed its review of the stage 1 hydraulic model. The hydraulic model is considered to be largely appropriate. However, we have identified some minor points for consideration and requested clarity on a few issues. We have received some updates in the regards to issues raised from the Applicant, and these are currently under review. We are also in the process of reviewing the stage 2 hydraulic model (post development modelling).

