

## **Applicant's Response to Secretary of State Appendix 1**

### **POTENTIAL NEW CULVERT UNDER THE A449 – ENVIRONMENTAL STATEMENT COMPLIANCE NOTE**

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#### **1 Introduction**

- 1.1 The Secretary of State, in his letter dated 24<sup>th</sup> January 2020, has stated: *“Please could the Applicant confirm that if the additional culvert potentially envisaged by the revised requirement were to be constructed and used it would not give rise to any different conclusions in the Environmental Statement? Or provide details of such different conclusions if this is not the case?”*
- 1.2 This compliance note addresses this query and considers whether a potential new culvert would give rise to any different conclusions in the Environmental Statement (ES).

#### **2 Description of Amendment**

- 2.1 The additional culvert would comprise the installation of a new culvert beneath the A449 as part of the overall drainage strategy.
- 2.2 If required, the additional culvert would be constructed to the north of the existing culvert which is underlying the A449 to the north of Gravelly Way. It is likely that the additional culvert would be located within approximately 10m of the existing culvert, however there is flexibility consistent with the drainage strategy and it could be constructed further to the north of the existing culvert location if felt appropriate. The additional culvert would connect the proposed development drainage to the same watercourse to the west of the A449 as would the existing culvert.
- 2.3 The additional culvert would not comprise a material change to the drainage strategy, which is not dependant on the precise location of the culvert under the A449. The drainage strategy for the proposed development has been designed in accordance with the National Policy Statement for National Networks (NPSNN) and planning policy technical guidance and has been agreed by the Lead Local Flood Authority (LLFA) and Environment Agency (EA), who are responsible for ordinary and critical watercourses respectively. This is in respect of both quantity and quality of the water from the proposed development. The receiving watercourse would be the same, and all modelled flow rates would be the same, with the new culvert sized accordingly.
- 2.4 Utilisation of a new culvert at the A449 would not affect any of the drainage design upstream, including the proposed network of swales or ponds, either qualitatively or quantitatively. On the downstream (western) side of the A449 it is anticipated that a short length of new ditch would be constructed parallel with the road to connect the additional culvert with the receiving watercourse. There is sufficient space within the Order Limits and parameters plans to construct the culvert and connections on both sides of the A449.
- 2.5 The sizing of the additional culvert has not been fully determined at this stage, but it is anticipated it would be the same size or smaller than the existing culvert, noting that it would only receive drainage from the WMI site and not the A449, in contrast to the existing culvert which receives water from existing land drainage networks within the WMI site and the A449.
- 2.6 If required, the additional culvert would result in a minor change to the construction process. In this respect, a reasonable worst case has been assumed for the purposes of this assessment, in that the preferred methodology for the construction of the additional culvert has not yet been determined. The additional

culvert could be constructed either using open cut or trenchless methods. Therefore, both methods have been considered as part of this assessment.

- 2.7 The estimated duration of works to install the additional culvert is approximately 3-6 weeks. It is anticipated that this could be undertaken within the 9-12 month overall timescale already required to construct the new roundabout on the A449 (as part of WMI) and therefore would not result in an extension to the overall construction duration on the A449.
- 2.8 The Order Limits established by the DCO application are considered adequate to accommodate all permanent and temporary works on both sides of the A449 required to construct the additional culvert, whether it is installed by trenchless or open cut methods.

### **3 Environmental Effects**

- 3.1 The overall scale of this change in the context of the wider WMI site is very small and within the parameters assessed in the ES. The potential environmental effects are therefore considered below at a level proportional to the scale of this change.
- Agricultural Soils – the additional culvert would be located entirely within the Order Limits and therefore would not result in any additional land take or impacts to agricultural land.
  - Air Quality – no effects above or different to those assessed in the ES are anticipated.
  - Archaeology and Built Heritage – the additional culvert is not located near to any known above or below ground heritage assets at the WMI site as presented within Chapters 8 and 9 of the ES (Document 6.2, [APP-028](#) and [APP-029](#)) and their respective technical appendices. Risks to unknown assets would be managed in the same way as the remainder of the proposed development, through development of a Written Scheme of Investigation (WSI) prior to construction commencement (in accordance with the Outline WSI (Document 6.2, ES Technical Appendix 8.5, [APP-079](#))). No effects above or different to those assessed in the ES are anticipated.
  - Ecology – Construction of an additional culvert could result in some additional loss of intact species poor hedgerow and small trees that lie on the existing A449 highway boundary, although the precise location can be selected to limit any effect. No other ecological features would be affected by the additional culvert. This would not result in a material change to the effects assessed in the ES without mitigation. It is likely that any loss of hedgerow/trees would be replaced ‘like for like’, either adjacent to the additional culvert or within the WMI site, and the additional culvert would be located so as to minimise loss of retained vegetation, the culvert being required to be approved pursuant to Requirement 3(2)(e). If applicable, prior to the construction of the additional culvert an ecological mitigation and management plan would be prepared (as secured by Requirement 11).
  - Ground Conditions – the new culvert would not be located in or near areas of known contamination at the WMI site and is in an area characterised by agricultural land. No effects above or different to those assessed in the ES are anticipated.
  - Landscape and Visual – see under Ecology above in relation to hedgerows and trees. No effects above or different to those assessed in the ES are anticipated.
  - Noise and Vibration – no effects above or different to those assessed in the ES are anticipated.
  - Socio-economics / Health – no effects above or different to those assessed in the ES are anticipated.

- Transport and Access – construction of the potential new culvert, assuming open cut methods as established above, would likely require temporary lane closures on the A449. It is anticipated that these works would not result in an extension to the overall construction duration on the A449, therefore the overall traffic effects would not be significant. The design and construction proposals would be agreed in advance with HE and SCC. No effects above or different to those assessed in the ES are anticipated.
- Water Environment – the potential new culvert would not result in a material change to the drainage strategy for the proposed development. The receiving watercourse would be the same, and all modelled flow rates would be the same, with the new culvert sized accordingly. There would only be a minor spatial change to the immediate upstream and downstream conveyance to connect the additional culvert to the WMI drainage and receiving watercourse respectively. The additional culvert would therefore not result in a change to the effects assessed in the ES for flood risk or water quality.
- Cumulative effects – no effects above or different to those assessed in the ES are anticipated.

## **4 Conclusions**

- 4.1 This report concludes that the additional culvert would not give rise to any different conclusions in the Environmental Statement and there would be no additional likely significant effects over and above those already considered in the Environmental Statement.