

Mrs Jenny Clifford  
Mid Devon District Council  
Forward Planning & Conservation  
Phoenix House Phoenix Lane  
Tiverton  
Devon  
EX16 6PP

**Our ref:** DC/2014/114498/SL-  
01/SB6-L01

**Your ref:**

**Date:** 29 June 2018

Dear Mrs Clifford

### **Review of Flood Risk Assessment for the Proposed New M5 Motorway Junction (28A) & Cullompton Town Centre Relief Road**

We write following receipt of the revised Flood Risk Assessment (FRA), dated June 2018 by Arcadis regarding the Cullompton Eastern Relief Road and Proposed New Southern Bridge/Proposed Junction 28A (M5).

#### **Environment Agency position**

We consider that the revised FRA contains sufficient information to demonstrate that a motorway junction and relief road scheme as allocated in the Mid Devon Local Plan can be implemented in a way in which flood risks could be adequately managed and could lead to an overall net reduction in flood risk to people and property. Consequently we are satisfied, at the current time, that the allocation can meet the Exception Test requirements set out in the National Planning Policy Framework (NPPF).

We believe that the FRA work to date is a sound study of the current (i.e. baseline) degree of flood risk and that the principle of construction of additional road infrastructure, as highlighted within the FRA, is acceptable subject to further detailed design.

We acknowledge that the model has been run to appraise the consequences of storm duration sensitivity, details of which are included within Section 7.3.4 of the FRA.

However, it is important to recognise that Section 1.4 of the FRA states 'The report is based on information available at the time of writing'. As such our position could change as further information comes forward.

In addition to the above we wish to take this opportunity to make the following points:

#### **Flood culvert provision**

Some modifications to the design of some of the proposed culverts both over existing watercourses, and flood relief culverts beneath the proposed embankments, will be necessary following the findings of detailed design and we acknowledge this is highlighted within Table 7-3 of the FRA.

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We take this opportunity to re-emphasise that removal of some of the embankment that forms part of the existing road link between Old Bridge and New Bridge, and /or installation of a culvert, or culvert(s) within it, has the potential to reduce flood risk to the mainline railway, and M5 at this location.

Evidence we hold of the 21 November 2012 flood clearly indicates that the railway line at this location flooded, and that the M5 was close to flooding also. It would seem appropriate then, that it would be in Network Rail's and Highway England's interests to support such intervention.

It should be recognised that the railway near First Bridge would flood, thus rendering the track at this location unusable, whereas the railway at Hele, and Cowley Bridge should be usable given the flood risk measures proposed. As such the railway at First Bridge would therefore be the next 'weak link'. The option of such intervention must be appraised at detailed design stage.

This approach would support the aims of the National Planning Policy Framework in that development should, where possible, reduce flood risk overall.

### **Flood resilience measures**

We acknowledge the risk of flooding to parts of proposed relief road element of the scheme, in particular the interface of the proposed relief road with Meadow Lane.

This area floods frequently in periods of prolonged wet weather and the safety of users of the road must be safeguarded. As such we endorse the principles of the risk control measures included within Section 7.4.1 of the FRA. On this note we strongly advise that additional standalone telemetry be put in place, to instigate road closure procedures, to supplement EA Flood warning systems.

Flood residence measures must be offered to the key receptors as highlighted in Section 7.7.3 of the FRA.

### **Cost Recovery Service**

We have not previously sought to recover our costs for providing advice on the hydraulic modelling and flood risk assessment in order to support the proposal as the local plan goes through examination. However, as the focus of this work now moves on to the delivery of the relief road we will need to recover our costs. This is because we are not currently resourced to undertake non-statutory work and we therefore need to make you aware that if you require any further input from us we will need to recover our costs for this work. The fee for this is £100 per hour plus VAT. We would be happy to answer any questions you or the developers have about the service we are able to provide should this be required in the future. Please contact me if you require any further advice.

Yours sincerely

**Mr Robin Leivers**  
**Sustainable Places Team Leader**

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