

Ms Shenaz Choudhary - Planning
Casework Officer
Department for Transport
Transport Infrastructure Planning Unit
Great Minster House 33 Horseferry Road
LONDON
SW1P 4DR

Our ref: AC/2024/132485/02-L01

Your ref:

Date: 19 August 2025

Dear Ms Choudhary

**TRANSPORT AND WORKS ACT 1992
TRANSPORT AND WORKS (APPLICATIONS AND OBJECTIONS
PROCEDURE) (ENGLAND AND WALES) RULES 2006
THE CAMBOURNE TO CAMBRIDGE ORDER**

Further to our previous representation we are able to remove our objection on flood risk grounds and wish to make the following comments.

We first reviewed the applicant's Bin Brook model at the pre-application stage and provided a response to the applicant on 15th November 2023, stating that the model was unsuitable for its intended use. At the statutory consultation the model was not submitted therefore we were unable to determine whether our concerns had been resolved and objected in our letter dated 8th January 2025. Subsequently, the applicant approached us directly to review the model. We carried out two model reviews and provided feedback to the applicant in March 2025 and July 2025. At the most recent review there were still technical issues to address. The applicant submitted justification against these points.

Having reviewed the applicant's response we consider that the model is acceptable for assessing flood risk in the area of interest. While there are some technical issues identified (discussed below), the modelling is considered to be acceptable for the scale and nature of the proposed development. Therefore we are removing our objection.

Flood Modelling

The main issue raised at review was the age of the hydrology. Environment Agency guidance standards consider a 6 month timeframe is reasonable for transitioning to using new methods and data. The rainfall data set used in the model's hydrology is approximately 3 years old. The applicant has carried out sensitivity testing to demonstrate that the difference between the 2013 and 2022 data sets (FEH13 and FEH22) is approximately 3%. They have also demonstrated that the FEH22 values for the 1% Annual Exceedance Probability (AEP) for this site fall into the 68%/95% confidence intervals for the FEH 13 values that were used. This shows that they are within likely acceptable error margins for those values. Therefore, we consider that an update to the current version of the hydrology data sets would not materially change the outcome of the modelling, and this issue is resolved.

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The review also noted the presence of glass walling at the downstream end of the model. Glass walling is a modelling technique where the boundary is treated as a reflective barrier, preventing flow from passing through. This can create artificially higher water levels in the model that do not reflect reality. However, this feature is located far enough downstream and is separated from the site by other structures such as weirs, culverts, and bridges that prevent any backflow effects impacting the site. Therefore we consider that the glass walling does not affect the consideration of flood risk from the scheme.

The model shows minor increases in flood depths in some already inundated areas. These increases are maximum 8mm increase on depths of approximately 900mm in open fields. There are decreases of similar magnitude in the built up area immediately downstream of the bridge in the proposed design. The Design Manual for Roads and Bridges ([Standards For Highways](#)) states a less than or equal to 10mm increase in water levels, as demonstrated in modelling, is an acceptable detriment in road and bridge schemes.

There is a minor increase in the flooded extent. A small number of extra grid cells in the model domain, upstream of the bridge in the open fields, are indicated as wet in the after vs the baseline case. This occurs in the open fields area within the redline boundary. As this is within the redline boundary, we consider this acceptable.

On this basis we consider that the model can be used to make decisions with regards to flood risk in the area of interest. It is important to note that although the model is suitable for supporting the TWA Order and Flood Risk Assessment, it would not meet internal Environment Agency standards for updating the flood map without addressing the issues highlighted in the review.

Flood Risk Assessment

Our original objection was based on the pre-application model we reviewed not being suitable for assessing flood risk. Following the applicant's revisions and justifications, as outlined above, we are now satisfied that the model is appropriate for use in assessing flood risk for the application and are therefore able to comment further on the flood risk implications of the scheme. The Flood Risk Assessment (FRA) must meet the requirements of the Exception Test as set out in Paragraph 168 of the National Planning Policy Framework (NPPF). In accordance with the NPPF, the FRA should demonstrate that the proposed development will provide wider sustainability benefits to the community that outweigh the flood risk, and that it will be safe for its lifetime without increasing flood risk elsewhere. Specifically, it must demonstrate that there will be no increase in flood risk outside of the red line boundary and, where possible, deliver a net reduction in overall flood risk.

Based on our review of the Bin Brook Model Report (v1.4) and the FRA (Appendix TR13.1), we consider that the modelling work is sufficiently robust to support the FRA in meeting the NPPF requirements on flood risk. The model outputs show negligible reductions in flood depth outside the red line boundary, limited to small reductions in some locations, with all increases contained within the site. As stated in the FRA (Section 5.2.7): "As these changes are within the redline boundary there are no impacts of increased flood risk to third parties." These changes are within acceptable tolerances, do not materially increase flood risk to third parties, and demonstrate that the proposed development can be made safe for its lifetime. On this basis, the FRA satisfies the second limb of the Exception Test by evidencing that the scheme will not increase flood risk elsewhere. The wider sustainability benefits of the scheme are set out elsewhere in

the planning application; however, the FRA should continue to seek opportunities for net reductions in overall flood risk wherever practicable, in line with the NPPF.

We hope this information is of assistance. If you have any queries, please do not hesitate to contact us.

Yours sincerely

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