

Statement of Common Ground Between Environment Agency and Cambridgeshire County Council

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Transport and Works Act 1992

**The Transport and Works (Inquiries
Procedure) Rules 2004**

**The Cambourne to Cambridge
Order 202[#]**

**Applicant's Statement of Common Ground with
Environment Agency**

Planning Inspectorate Reference	
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1 Introduction

1.1 Purpose of this document

- 1.1.1 This Statement of Common Ground (SoCG) has been prepared in respect of the Cambourne to Cambridge Scheme (the “Scheme”) as part of the application made by Cambridgeshire County Council (the “Applicant”) to the Secretary of State for Transport, for a Transport and Works Act Order (TWAO) under sections 1, 3 and 6 of the Transport and Works Act 1992 (the “1992 Act”).
- 1.1.2 A detailed description of the Cambourne to Cambridge scheme (“The Scheme”) can be found in Chapter 3 of the Applicant's Environmental Statement (Doc Ref CD1-10.01). All application documents referred to are available on the Public Inquiry website at <https://gateleyhamer-pi.com/en-gb/c-to-c/inquiry-documents/>.
- 1.1.3 This SoCG does not seek to replicate information which is available elsewhere with the application documents.
- 1.1.4 This SoCG has been produced to confirm to the Inquiry and Secretary of State where agreement has been reached between the parties to it, and where agreement has (not) yet been reached. SoCGs are an established means in the planning process of allowing parties to identify and focus on specific issues that may need to be addressed during the Inquiry.

1.2 Parties to this Statement of Common Ground

- 1.2.1 This SoCG has been prepared between (1) the Applicant and (2) Environment Agency.
- 1.2.2 The Applicant is the Local Highway Authority for its administrative area for the strategic road network and has the necessary powers and duties to operate, manage, maintain, and enhance the local transport network.
- 1.2.3 Environment Agency is a public body who works to create better places for people and wildlife, and supports sustainable development.

1.3 Terminology

- 1.3.1 Within the table in Section 3, Issues of this SoCG, the terminology is as follows:
 - “Agreed” indicates area(s) of agreement.
 - “Under Discussion” indicates area(s) of current disagreement where resolution remains possible, and where parties continue discussing the issue(s) to determine whether they can reach agreement by the end of the Inquiry; and
 - “Not Agreed” indicates a final position for area(s) of disagreement where the resolution of the divergent positions will not be possible, and parties agree on this point.
- 1.3.2 It can be assumed that any matters not specifically referred to in Section 3, Issues of this SoCG are not of material interest or relevant to Environment Agency and therefore have not been subject of any discussions between the parties. As such, those matters can be read as agreed, only to the extent that they are either not of material interest or relevance to Environment Agency.

2 Record of Engagement

2.1.1 A summary of the meetings and correspondence that has taken place between the Applicant and Environment Agency (EA) in relation to the application is outlined in **Table 2.1.1** below.

Table 2.1.1 Record of Engagement

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
16/07/2020	Meeting minutes	Landscape Heritage Ecology Working Group (LHE) meeting minutes. Actions: Review and consider the medium for sharing e.g. Huddle, SharePoint, File camp.
22/09/2022	Meeting minutes	Active Travel Working Group attended by GCP, WSP, Atkins, CCPF, CAM Cycle, The British Horse Society, Cambridge City Council – Accessibility and Shelford & District Bridleways Group.
17/01/2023	EA Consultation meeting minutes	EA Consultation meeting WFD between WSP and EA. Actions included: for the EA to forward details of BNG mitigation projects on Cam/Bin Brook and WSP to hold a discussion with the EAC team.
11/04/2023	Email	Email discussion around drainage and mitigation measures to be considered as part of the WFD assessment at the detailed design phase, submitted with the FRAP application.
17/07/2023	Email	Email discussions around flood risk assessments for active travel routes and Hydraulic modelling.
26/08/2023	Email	Discussion between the project team and the EA on what steps need to be undertaken for the EA to retract their objection of the project, and what conditions are tied to it.
15/11/2023	Letter	The EA outlines the findings from their review of the Bin Brook Hydraulic Model, with a summary of the issues identified.
04/12/2023	Generic email from East Anglia Area	Generic email from East Anglia Area regarding the process for logging complaints, requests for information, general enquiries and environmental incidents.
14/12/2023	Email	WSP requests confirmation that if the issues highlighted in red and orange are addressed, the EA would retract their objection.
20/12/2023	Email	The EA responds to WSPs email sent 14/12/2023 outlining that addressing the red and orange items should resolve concerns surrounding the model, however they would need to also review the Flood Risk Assessment.
03/05/2024	Confirmation Schedules	Letter sent from GCP to the EA as a confirmation of land interest in land/or property affected by the scheme.
12/11/2024	Letter	Schedule 5 Notice
15/01/2025	Email	Letter sent from GCP to the EA, stating that the EA had some land ownership within the area. EA confirmed on 10/05/2024 that they do not have any ownership within the boundary area.
31/01/2025	Email	An email was sent to Alison Craggs regarding the Bin Brook Model and the design changes that have been made and whether the EA will be content with the changes and retract their objection.
03/02/2025	Email	Alison Craggs responded and advised that as the previous agreement has expired, a new quote has been generated in respect of their advice. The quote is £3,000 for 30 hours work plus VAT.

Date	Form Correspondence of	Key Topics Discussed and Key Outcomes
03/02/2025	Email	GCP sent response to EA that they will initiate the formalisation of the order and WSP will assist with access to files and questions.
27/02/2025	Email	EA expects to respond by 17/03/2025 on the objection to the model, WSP requested an earlier response as the Statement of Case is due to be submitted by 19/03/2025. The EA cannot guarantee a response by then and had queries about the reviewed report which WSP confirmed includes additional items addressing LIT review comments and is the latest version.
28/03/2025	Email	The EA provides feedback on their review of the hydrology, highlighting concerns raised over the potential for outdated methods/ data used and the incorrect application of ReFH2, in addition to a number of Amber comments. The EA also highlighted concerns with the hydraulic modelling review, requesting all amber and red comments are addressed, and recommended that green comments are addressed as well. A Flood Hydrology Review Template and Non-real time Hydraulic Model Review Template is provided.
07/04/2025	Email	WSP provides responses for the two review documents shared by the EA on the 28/03/2025. WSP also commit to undertaking a sensitivity test on storm duration.
09/04/2025	Email	The EA confirm receipt of WSPs responses to the two review documents shared by the EA. The EA confirms that they will conduct their review once they have received the technical note on the sensitivity test. The EA suggests a meeting is arranged.
02/05/2025	Email	WSP provide EA with a copy of the technical note setting out the result of the sensitivity testing and outlined availability for a call.
07/05/2025	Email	The EA confirms receipt of the technical note and outline that the team will require 10 working days between receiving the submission and the meeting.
13/05/2025	Email	The EA outlines that after further discussion with the modelling team a meeting within 10 days would not be feasible, as a follow up with the external consultant that previously undertook a review, would be required.
13/05/2025	Email	As the EA will be sharing the hydraulic and hydrology response note with the external consultant, WSP offer to supply the sensitivity testing model files and raw results. WSP ask the EA to provide their availability for a call, in order for a placeholder to be put in place.
16/05/2025	Email	The EA agrees that WSP should provide any information that may support the review. The EA suggests meeting dates of w/c 23/05 and 30/05.
16/05/2025	Email	WSP outlines the rationale for undertaking the sensitivity test (i.e. seeking agreement that the comments from the previous model review are sufficiently addressed). WSP outlines that they are happy to supply the sensitivity models and results as evidence, however they would not want this to be characterised as a re-review. WSP request that the EA provide an EA ShareFile for the documents to be uploaded to.
16/05/2025	Email	The EA confirms that they would consider the receipt of the sensitivity model files as an addendum to support the model review and therefore a follow up, rather than a re-review. A link is provided for sharing files.
30/05/2025	Email	WSP seeks confirmation that the EA has received the files that were uploaded to provided link. WSP seek a date for a follow up call.
10/06/2025	Email	WSP seek an update from the EA on the review of the information provided.
13/06/2025	Email	WSP seek confirmation that the EA has received the model files uploaded on the 21/05 and when the review may be concluded.
16/06/2025	Email	The EA respond, outlining that they will chase their modelling team for an update.

Date	Form Correspondence	of Key Topics Discussed and Key Outcomes
20/06/2025	Email	GCP contact the EA, requesting an update. Outlining that the public inquiry is starting on September 16 th , therefore an urgent meeting is required on how best to proceed.
20/06/2025	Email	The EA confirms that the review is underway but requires a missing file to continue. File BB01_008_Prop_initial_conditions.icc is requested from WSP. The EA outlines that the final deadline for the second review is the 5 th of July.
20/06/2025	Email	WSP provides the two initial conditions files that were used in the modelling and highlight both of these files were provided in the ZIP folder. WSP seeks confirmation on the file that the EA has requested, as the reference does not appear in their system. WSP outlines that the comments from the previous review did not show any issues with the initial conditions.
01/07/2025	Email	GCP request an update on WSPs email sent 20/06/2025.
01/07/2025	Email	The EA confirm that they accept the details outlined in WSPs email 20/06/2025 and provide a new deadline of 25/07/2025.
24/07/2025	Email	WSP and GCP reach out to the EA asks for an update on the deadline set in the EA email 01/07/2025 and request a meeting.
25/07/2025	Email	GCP, WSP and the EA arrange a call to discuss the EAs position.
25/07/2025	Email	The EA confirms that their modelling team have completed the review of WSPs response and provides comments.
29/07/2025	Email	WSP provide the EA with the Modelling and Hydrology Technical Note 2 in response to their latest review.
08/08/2025	Email	The EA confirms that they consider the model used for the Scheme acceptable for assessing flood risk in the area of interest. Whilst they note some technical issues, they outline that these do not appear to materially affect the flood risk evaluation. The EA adds that post-development modelling will need to demonstrate that any increase in flood risk remains within the red line boundary of the application and, where possible, that the structure delivers an overall improvement in flood risk. The EA notes that although suitable for supporting the TWA Order and Flood Risk Assessment, it would not meet internal EA standards for updating the flood map without addressing the issues highlighted in the review. The EA states that for planning purposes it is acceptable and as such they withdraw their objection on flood risk grounds. The EA confirms that they will notify the inspectors by 19/08.
19/08/2025	Letter	The EA issue an official letter formally withdrawing its objection.

2.1.2 It is agreed that this is an accurate record of key meetings and other forms of consultation and engagement undertaken between the Applicant and the EA in relation to issues addressed in this SoCG.

3 Issues

3.1 Issues agreed, not agreed or under discussion

3.1.1 Table 3.1.1 below details the issues which have been agreed, not agreed or are under discussion between the Applicant and the EA.

Table 3.1.1 - Issues

Issue No.	Issue	Document Reference	Environment Agency's Position	Applicant's Position	Status	Date status confirmed
1.	Objection	AC/2024/132485/02-L01	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.	The Applicant thanks the EA for the letter sent 19/08/2025, containing confirmation that the flood risk model is acceptable for assessing flood risk in the area of interest.	Agreed	29/10/2025
2.	Age of the hydrology	AC/2024/132485/02-L01	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.	The TWAO preparation process often requires a time-consuming programme of support, design and assessment works undertaken over a number of years prior to submission of the draft Order and further time to examine the draft Order at Inquiry. It is impractical to continue to update key design criteria such as the bridge soffit (informed by flood level and other factors) all the way through the process and at some point a design freeze is required. This may necessitate relying upon hydrology that includes data more than 6-months old. The Applicant has demonstrated that the hydrology results are not materially sensitive to the incorporation of additional data (to date) and that sufficient freeboard has been included in the design criteria so as to account for this type of uncertainty.	Agreed	29/10/2025
3.	Glass walling	AC/2024/132485/02-L01	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 Applicant agrees with the EA's description and characterisation of the glass walling and the conclusion that it does not affect the consideration of flood risk from the scheme.	Agreed	29/10/2025
4.	The models use in making decisions about flood risk to the area of interest	AC/2024/132485/02-L01	The model shows minor increases in flood depths in some already inundated areas. These increases are maximum 8mm increase on depths of approximately 900mm. 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	The Applicant welcomes the conclusions of the EA that the model is suitable for its intended use. The Applicant agrees with the EA's description and characterisation of the impacts of the scheme on water levels, inundation extent and flood risk. The Applicant confirms they have no intention of pursuing an update to the flood map at this time and would welcome the inclusion of the scheme in EA's next scheduled update of the Bin Brook model post construction.	Agreed	29/10/2025

Issue No.	Issue	Document Reference	Environment Agency's Position	Applicant's Position	Status	Date status confirmed
5.	The Flood Risk Assessment (FRA) meeting the requirements of the Exception Test.	AC/2024/132485/02-L01	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 National Planning Policy Framework (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 most increases contained within the site. The model outputs show very small increases in flood depths up to 8mm outside the red line boundary. However, these increases are within acceptable model tolerances (i.e. less than 10mm) and are therefore unlikely to have a significant impact on 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.	The Applicant welcomes the conclusions of the EA that the modelling work is sufficiently robust and supports the FRA in meeting the flood risk requirements set out in the NPPF. The Applicant agrees the modelling and FRA show that the proposed scheme will not materially increase flood risk to third parties, and demonstrate that the proposed development can be made safe for its lifetime, satisfying the second limb of the Exception Test. The Applicant acknowledges the EAs recommendation that the FRA should continue to seek opportunities for net reductions in overall flood risk wherever practicable.	Agreed	29/10/2025
6.	Objection		The Environment Agency have no Objection to the draft Order with their previous objection (dated January 2025) having been removed following provision of the modelling files and supporting documentation.	Agreed.	Agreed	29/10/2025

Womble Bond Dickinson (UK) LLP
Signed for and on behalf of Cambridgeshire County Council:

Name: Womble Bond Dickinson (UK) LLP

Authorised Signatory

Dated: 30/10/25

Signed on behalf of Environment Agency: 

Name: Alison Craggs

Authorised Signatory

Dated: 30/10/25