



# MIDDLE LEVEL COMMISSIONERS

MIDDLE LEVEL COMMISSIONERS  
85 WHITTLESEY ROAD, MARCH,  
CAMBRIDGESHIRE, PE15 0AH

Telephone: (01354) 653232  
E-mail: [admin@middlelevel.gov.uk](mailto:admin@middlelevel.gov.uk)

Fax: (01354) 659619  
[www.middlelevel.gov.uk](http://www.middlelevel.gov.uk)

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**I.A.D. SMITH** B.A., Solicitor  
**Clerk and Chief Executive**

*Our Ref.: 8/3h(i)*

*Your Ref.:*

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14 February 2012

Dear Renuka

Cambridgeshire Flood Risk Management Partnership  
Draft March Surface Water Management Plan

Thank you for sending through the draft of the above plan, which I have considered and also shown to our Planning Engineer, Graham Moore. Our principal comments at this stage are that while the Plan raises a number of issues, they seem to have been given only a very, very preliminary consideration and the recommendation to treat Option C2 as preferred seems premature.

Our more detailed comments are:-

- 1.5 (a) We note that overland flows from within the urban area are not included within the definition of surface water flooding. As previously indicated, we consider this to be a serious shortcoming.
- 1.5 (b) Bearing in mind that there are no main rivers within the Study Area, this comment needs to be clarified but may be explained by the assumption made in 3.4.2 below. What Main River flooding has been recorded?
- 1.6 Infiltration regimes do not generally work in March.
- 2.1.1 What depth of water and in what circumstances constitutes flooding for the purpose of this Report?
- 3.1.1 March falls within the Old Bedford Middle Level Sub-Catchment. I suggest that you recheck this paragraph.
- 3.1.2 The reference should be to the 'Middle Level Commissioners' and North Level District IDB systems.'
- 3.1.3 onwards – There is no reference to the Middle Level Strategy. The reference to the SFRA needs to be checked.
- 3.1.5 The maintenance manuals refer to both the Commissioners and the IDBs.
- 3.4.2 The River Nene in March is not a Main River but a watercourse under the jurisdiction of the Commissioners. The IDBs maintain no bridges across the Nene. Figure 3.3 also gives IDB Catchment not Rateable boundaries.

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- 3.5.1 The applicability of these Plans to the Fenland area is limited. It is specifically stated  
3.5.2 in 3.5.2 that artificial drainage regimes are not taken into account. Please define 'deep' and  
'shallow' flooding.
- 3.6 The IDBs maintain only the smaller arterial watercourses, under their jurisdiction. There are  
plans showing these watercourses on our website.
- 4.1 In this area, the 1 and 2 metre resolution LIDAR data is poor.  
Stage 1. Does this allow for watercourses?
- 4.3.1 Why was it decided only to use March 3<sup>rd</sup> and March 5<sup>th</sup> DDC information?
- Fig 4.2 Only some IDB channels are plotted.
- 4.3.3 No assessment is made of the effect of and on the remainder of the Middle Level system.  
The water level at 99.15 MLD seems low. It is normally held at 99.50 MLD (-05 AOD).
- 5.2 Mr Moore comments that Maple Grove and Wisbech Road are outside an IDB; Gaul Road  
and the area around the Recreation Ground have problems due to poor infiltration and  
surface water sewer problems and Green Street and Morton Avenue lack surface water  
sewers.
- 6.1.1 March 3<sup>rd</sup> DDC is in the south west of the Catchment.
- Fig 6.2 Mr Moore comments that some of the wetspots shown are balancing pond and some have  
arisen from the piping of watercourses.
- 6.2.2 Fig 6.4 March 3<sup>rd</sup> DDC already have plans to improve their system in conjunction with a  
development in one of the wetspots. Another may be explained by the gravity outfall being  
tidelocked.
- 6.5.1 The March 3<sup>rd</sup> system was not designed to cope with the 1:200 (0.5%) event. We would  
expect rather more than 9 properties to be affected in this scale of event.
- 6.5.2 This does not seem right.
7. No reference is made to a potential restriction on sewer discharges to the Middle Level  
system and the effect of this.
- 7.1 Swales will not work in most of March. The use of open spaces at schools is surely also a  
health and safety issue.

Mr Moore in particular has a number of concerns with many of the proposals in Table 7.1.  
These can be discussed in detail but essentially he queries the scale, the absence of outfalls

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and the presumption that an increased discharge into the Middle Level system would be permitted. If permitted, such discharges would attract a development contribution currently £51,976 per impermeable hectare, which would affect the viability of some proposals. In addition, it should not be assumed that the suggested West End Pump would be allowed. He also comments that, in his view, permeable paving will not work due to expense and long term maintenance issues. We have for some time been suggesting to Fenland District Council that more attention is paid to overland and substrata flow paths, not comprising watercourses.

- 8.1 The CFRMP has no funding; the funding is that of the respective priorities. Care must be taken that the use of excavated materials on site does not block flow paths.
- 8.1.1 March is not in East Cambridgeshire.
- 8.1.4 We are unable to pass comment on this in view of the issues set out elsewhere in this response.
- 8.2.1 See 6.5.1 above.
- 9.1 Please give details of the 'overland route from the south'. We are not aware of any surface water sewers in Ellingham Road, since most properties are on soakaways.
- 9.2 The overall impact of increased maintenance would have to be assessed. We do not consider permeable paving a particularly sustainable option.  
We note the benefits suggested. Issues such as maintenance remain to be settled.

Yours sincerely

Clerk & Chief Executive

cc G Moore  
Sass Pledger

Renuka Gunasekara  
Technical Director – Integrated Water Management  
Hyder Consulting UK Ltd  
Eco Innovation Centre  
Peterscourt, City Road, Peterborough  
Cambridgeshire, PE1 1SA