

**From:** Patrick Durnford <pd@fowlerfortescue.co.uk>

**Sent:** 24 June 2019 15:45

**To:** katie.silver@wsp.com; Parris, Jack <Jack.Parris@wsp.com>

**Cc:** A303 Stonehenge <A303Stonehenge@planninginspectorate.gov.uk>; F [REDACTED]

[REDACTED] David Holmes <dh@fowlerfortescue.co.uk>

**Subject:** Representation Regarding Factual Inaccuracy

Dear Katie,

Thank you for your email.

Please note that my Clients renewed Water Abstraction Licence was issued in June 2018. This was before the publication of their Environmental Statement, but I suspect after their survey with the EA had been conducted.

A particular concern is that those presenting the information on behalf of Highways England, were actually using and presenting out of date information. It is important for this to be known to the planning inspectorate.

The proximity of my Clients main borehole (upon which the farm is critically reliant) is in extreme proximity to the route and compound areas. I believe this is a material issue for the Inspectorate to be made aware in consideration of the several representations made relating to water protection.

Please can you confirm that the proximity correction has been noted and explained to the Inspectors.

Yours sincerely,

Patrick Durnford [BCS HONS MRICS](#)

DIRECTOR

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**From:** Silver, Katie [<mailto:katie.silver@wsp.com>]

**Sent:** 24 June 2019 12:20

**To:** Patrick Durnford <[pd@fowlerfortescue.co.uk](mailto:pd@fowlerfortescue.co.uk)>

**Cc:** Parris, Jack <[Jack.Parris@wsp.com](mailto:Jack.Parris@wsp.com)>

**Subject:** RE: Representation Regarding Factual Inaccuracy

Good afternoon Patrick,

Thank you for your email, and for bringing this to our attention.

I apologise that you had to notify us that boreholes were missed off the preliminary environmental impact review in the hearings for the Turners land. I have investigated the matter further, and it appears that 4 boreholes are given in the groundwater risk assessment in Table 3.3 Appendix 11.4 [APP-282]. The table also acknowledged that their licences had expired and were being re-applied for.

The table contains points A-D, but is missing point E (near to point D and approximately 200m south west). I have been assured that none of these points are predicted to be impacted by the scheme, where a falling water table may risk the water supply. Aside from point E, if anything else has been missed, please can you let us have the details as soon as possible?

The most recent discussions with the Turners were during a visit to their boreholes by Armelle Bonneton on 30<sup>th</sup> May 2019, with a view to carrying out the monitoring requested by borehole users (this monitoring is not required, but HE have agreed to undertake this where practicable). The team are aware of 4 boreholes and a large diameter well, and there has been ample opportunity for the Turners to make them aware of any other boreholes.

Irrespective of the detail of boreholes, the Environmental Statement assesses impacts on the aquifer as a whole, and there are no significant impacts (upon either the water levels, flow or quality) on the aquifer from which the boreholes draw water.

Again I apologise that point E was missed, and this will be rectified. However, if there are any further details for other boreholes or indeed any other information that we need to be made aware of in relation to the Turner land please can you let us know as soon as possible.

Kind regards,

**Katie Silver**

Land Services, A303 Stonehenge Graduate Land Consultant

Highways England | Temple Quay House | 2 The Square, Temple Quay | Bristol | BS1 6HA

WSP | 70 Chancery Lane | London | WC2A 1AF

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**From:** Patrick Durnford [<mailto:pd@fowlerfortescue.co.uk>]

**Sent:** 11 June 2019 16:41

**To:** Parris, Jack <[Jack.Parris@wsp.com](mailto:Jack.Parris@wsp.com)>; Silver, Katie <[katie.silver@wsp.com](mailto:katie.silver@wsp.com)>

**Subject:** FW: Representation Regarding Factual Inaccuracy

Dear Jack and Katie,

Following attendance at today's hearing, please see below an email that I have submitted to the Planning Inspectorate.

In essence, it appears that Highways England application has overlooked the Turners abstraction points.

Many thanks,

Patrick Durnford [BCS HONS MRICS](#)

[DIRECTOR](#)

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**From:** Patrick Durnford  
**Sent:** 11 June 2019 16:35  
**To:** 'A303 Stonehenge' <[A303Stonehenge@planninginspectorate.gov.uk](mailto:A303Stonehenge@planninginspectorate.gov.uk)>  
**Subject:** Representation Regarding Factual Inaccuracy

Dear Sir or Madam,

I attended the Issue Specific Hearing (4) held today (11<sup>th</sup> June 2019).

I would please like to make the inspectorate aware (acting on behalf of my Client the Turner family of Manor Farm Winterbourne Stoke, who are affected landowners) of a significant factual inaccuracy regarding the information presented at the Hearing and request remedial evaluation.

During the Hearing the Inspectors were shown: FIGURE 10.5 GROUNDWATER SOURCE PROTECTION ZONES, GROUNDWATER ABSTRACTIONS AND RIVERS WITHIN THE GEOLOGY AND SOILS STUDY AREA. The representative of Highways England used the plan to show those groundwater receptors (abstractions) that are positioned in close proximity to the proposed alignment.

My client does in fact have a licenced abstraction that is not marked on the Fig 10.5. Highways England was made aware of this missing information through response to consultation dated 19<sup>th</sup> April 2018. Copies of the abstraction licences were subsequently sent to Highways England. We were then informed accordingly that the Environmental Statement was updated and an explanation given as to why this abstraction was not assessed in the first instance. This confirmation was provided in the Consultee record of Engagement ID: SH230418-10. I paste below the relevant extract.

I attach a copy of the abstraction licence – which includes a plan marking the locations of the wells and boreholes.

Water abstraction, particularly point CL021 (see appendix of response document)	Water Abstraction	Environment	<p><u>Issue</u></p> <p>The PEIR has not taken account of water abstraction from Manor Farm.</p> <p>Therefore there are a further five points of abstraction in close proximity to the proposed works which are receptors risks for contamination.</p>	<p>We can confirm that the project team received a plan from the Turner which confirmed the location of four of the boreholes. These boreholes have been included within the ES, including an explanation of why they were missed in the PEIR. A 50m exclusion zone will be applied the boreholes where they sit wholly or partially within the DCO boundary.</p>
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		<p>Abstraction license for 5 points (Greenlands Farm, Foredown, Longbarrow, Manor Buildings, Manor Farm) had expired due to a change of ownership and is in the process of renewal by the Environment Agency. The above points of abstraction have therefore have not been referenced within sections 10.2 and 11.5.50 of the PIER.</p> <p><u>Solution</u></p> <p>The pier needs to be updated to reflect the actual situation.</p> <p><u>Issue</u></p> <p>Water abstraction Point Marked CLO21 on Fig 10.2 of PIER Appendix, is functional and critical to the farm.</p> <p><u>Solution</u></p> <p>Water pipes traverse areas proposed as compounds and therefore an alternative secure supply is required.</p>	<p>However, there seems to be disconnect between the four boreholes previous identified by the Turners and the five locations mentioned here. Could the Turners please provide confirmation of the location of the Foredown and Manor Buildings boreholes?</p> <p>Possibility of using the water supply for the tunnel if supply is affected. However, it not expected to be required</p>
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Context:

A summary of the background as to this licenced abstraction is given within the record of consultation. In essence, my Clients were in the process of abstraction licence renewal and were subsequently issued with an abstraction licence in June 2018 (I attach a copy of that Licence).

Concern:

It appears that despite the fact that many conversations have been held with Highways England regarding these boreholes and a copy of the licence has been provided (and visits to set up monitoring). The Environmental Statement only references the pre-existing licence and not the current and renewed abstraction. Crucially it also does not show these abstraction points on Fig: 10.5 (the main abstraction point being located immediately adjacent to the route alignment and proposed compound).

We ask the Planning Inspectorate to require the applicant to acknowledge this consented abstraction and to update their documentation.

At approximately 12:43 am this morning the Applicants representative, summarised that Highways England had properly evaluated all receptors and concluded that none were in areas of risk. We would ask that the Planning Inspectorate require that this exercise be reassessed, as it appears that a crucial point of abstraction in proximity to the engineering works has been overlooked.

We are extremely concerned about this, particularly in the context of separate representations made over the risks to and dependence on groundwater to the farm.

We respectfully request that this matter be referred to the applicant for urgent redress.

Yours faithfully,

Patrick Durnford [BCS HONS MRICS](#)  
DIRECTOR

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