

The Planning Inspectorate
The A303 Amesbury to Berwick Down
Case Team
Temple Quay House
2 The Square
Bristol
Avon
BS1 6PN

Our ref: WX/2022/136152/01-L01
Your ref: TR010025
Date: 4 April 2022

Dear Sir/Madam

**A303 STONEHENGE (AMESBURY TO BERWICK DOWN) DEVELOPMENT
CONSENT ORDER APPLICATION. REQUEST BY DEPARTMENT FOR
TRANSPORT FOR COMMENTS ON THEIR STATEMENT OF MATTERS DATED 30
NOVEMBER 2021, THE APPLICANT'S RESPONSE TO THE STATEMENT OF
MATTERS OF 11 JANUARY 2022 AND 8 FEBRUARY 2022 AND ALL
REPRESENTATIONS PUBLISHED ON THE PLANNING INSPECTORATE WEBSITE.**

Thank you for consulting the Environment Agency on the Statement of Matters and other documents relating to the redetermination of the A303 Stonehenge Development Consent Order.

We have the following comments on the documents submitted by the Applicant in response to the Statement of Matters:

Bullet Point 1: Alternatives

[BP1 Alternatives.Redetermination-1.1.Final](#)

There are sensitive water receptors in the wider area of the scheme including designated Special Areas of Conservation (Rivers Avon and Till), principle aquifer, private and public water supply abstractions and their corresponding source protection zones. There are also likely to be additional sources of contamination that may be encountered and disturbed along any alternative route.

The potential impact on controlled waters receptors, including changes to water levels, flows and quality whether that be from the scheme itself or mobilisation of disturbed historic contamination, should be identified and taken into account if alternative routes are to be considered further.

The areas affected by changes to groundwater levels are likely to change in response to changes to the length or position of any tunnel and would require updated modelling to

Environment Agency
Rivers House, Sunrise Business Park, Higher Shaftesbury Road, Blandford, Dorset, DT11 8ST.
Customer services line: 03708 506 506
www.gov.uk/environment-agency

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ensure the level of risk to abstractions and other groundwater dependent features are acceptable.

Bullet Point 2: Policy

[BP2 Policy.Redetermination-1.2.Final](#)

No comment.

Bullet Point 3: Carbon

[BP3 Carbon.Redetermination-1.3.Final](#)

No comment.

Bullet Point 4: Environmental Information

[BP4 Environmental Information Review-1.4.Final](#)

Chapter 7: Geology and Soils

Paragraph 7.2.11: We welcome the recognition of the replacement of the CLR11 guidance with the Land Contamination: Risk Management guidance and the added consideration of climate change effects in the land contamination risk assessment. A number of factual reports have been submitted detailing ground investigations carried out across the scheme area. The results are synthesised into the Stage 1, Tier 2 Land Contamination Risk Assessment (AmW, 2021). Comments on the assessment are provided below, but in summary **we consider that the risks from historic contamination as related to the scheme have not yet been fully characterised and assessed.**

Paragraph 7.3.18: A fifth private groundwater abstraction borehole was added to abstraction licence 13/43/023/G/074 (subsequently re-numbered SW/043/0023/010) near Winterbourne Stoke during its renewal in 2018 which was not referred to in the Environmental Statement or supporting Groundwater Risk Assessment. This point should be added to the list of receptors and considered in any risk assessment. Where significant time has passed before scheme implementation, further water interests surveys should be carried out to ensure any new potential receptors are adequately protected.

Chapter 8: Road Drainage and the Water Environment

This section refers to ongoing monitoring of groundwater levels with the data having been reviewed up until June 2021. It is concluded that the continued monitoring supports the conceptual model presented in the Environmental Statement.

Paragraph 8.3.24: This paragraph should refer to the Supplementary Groundwater Model Runs to Annex 1 Numerical Model Report [AS-018] rather than the Implications of 2018 Ground Investigations to the Groundwater Risk Assessment which is document reference AS-017.

Paragraph 8.3.26 refers to an additional pumping test carried out in Stonehenge Bottom in March 2021 during a period of high groundwater level to test the validity of parameters used in the groundwater modelling. The pump test factual report has been submitted but the analysis and interpretation of the data has not although this section of the Environmental Information Review reports that the results of the analysis support the conclusions from earlier tests and that the groundwater modelling used conservative aquifer properties.

The improved understanding of the hydrogeological regime in the vicinity of the scheme should inform the detailed design and Groundwater Management Plan to ensure that appropriate monitoring and mitigation is implemented.

Where significant time has passed before scheme implementation, further water interests surveys should be carried out to ensure any new potential receptors are adequately protected.

[2.17 Stage 1, Tier 2 Land Contamination Assessment Report.Redetermination](#)

Having reviewed the Stage 1, Tier 2 Land Contamination Assessment Report **we consider that the risks from historic contamination as related to the scheme have not yet been fully characterised and assessed.** We recommend that site-specific conceptual models are developed for each of the potentially contaminative sites identified as requiring assessment rather than the generic site type conceptual models presented in the ES and referred to in this report. True site-specific conceptual models are needed to identify and assess specific source-pathway-receptor linkages and determine if adequate ground investigation data has been collected.

Dividing and assessing the full extent of the scheme into four areas can result in the large number of what might be considered background concentrations diluting and masking localised impacts that require further investigation and/or assessment. Where exceedences of generic assessment criteria have been identified, their relevance should be considered in light of the site-specific conceptual model and assessment at higher tier or proposals for remediation developed in accordance with the Land Contamination: Risk Management guidance.

We do not consider that a discovery strategy is an acceptable risk management approach in areas that will be disturbed by the scheme construction or operation, and which have been identified as potentially contaminated unless there has been appropriate ground investigation that demonstrates the absence of gross contamination. As well as reducing the risk of contamination being mobilised and causing pollution, adequate ground investigation prior to works will reduce the risk of unforeseen circumstances, potential delays and costs during scheme construction.

[2.18 Flood Risk Modelling Climate Change Update.Redetermination](#)

We have reviewed the updated Flood Risk Modelling Climate Change Update Ref: HE551506-AMW-EWE-ZZ-AC-LW-0001 dated 17/01/2021 Version: P03 (02/22) which was produced following the Applicant's response to the Statement of Matters of 11 January 2022 and 8 February 2022.

The updated higher central (56%) and upper allowance (102%) have been used which is appropriate. We note the increase in flood depth of 0.025m to 0.1m, observed to the north of the existing carriageway adjacent to one property in Winterbourne Stoke, for the 102% climate change simulation and that for the property identified, we are satisfied that flood risk as a result of the Scheme would be mitigated through the implementation of Requirement 10 of the DCO (dated 30 November 2021), and commitments MW-WAT12 and MW-WAT13 contained within the Outline Environmental Management Plan (OEMP)².

Bullet Point 5: Any other matters

[BP5 Any Other Matters.Redetermination-1.5.Final](#)

We note the points made in this document, including those that relate to Biodiversity Net Gain. However, we would encourage and recommend Biodiversity Net Gain being included in the scheme, if possible.

General comments on re-determination of the DCO

Groundwater protection and contaminated land

We were satisfied that the DCO previously granted included measures that would ensure the risks to the quality and quantity of controlled waters were appropriately managed and in consultation with the Environment Agency. It should be ensured that any new DCO granted for the scheme includes those same measures, including but not limited to:

- Article 13: Discharge of water
- Requirement 4: Outline Environmental Management Plan. To include, but not be limited to, the following clauses:
 - PW-G1: CEMP
 - PW-GEO1: Ground investigation
 - PW-GEO2: Contaminated land
 - PW-GEO4: Construction on or adjacent to land affected by contamination
 - PW-WAT1: Pollution control
 - PW-WAT2: Surface water drainage
 - MW-G5: Preparation of a CEMP
 - MW-G6: Revision of the CEMP
 - MW-G7: Management Plans
 - MW-G9: Piling Risk Assessments
 - MW-G11: HEMP
 - MW-GEO1: Contamination risks
 - MW-GEO2: Contaminated land
 - MW-GEO7: Excavated materials management
 - MW-GEO8: Construction on or adjacent to land affected by contamination
 - MW-WAT1: Pollution control
 - MW-WAT2: Water Management Plan
 - MW-WAT3: Site drainage
 - MW-WAT4: Spill response
 - MW-WAT5: Pollution incident monitoring
 - MW-WAT6: Protection of watercourses
 - MW-WAT7: Control of pollution to waterbodies
 - MW-WAT8: Dewatering and abstraction
 - MW-WAT9: Ground treatment
 - MW-WAT10: Groundwater Management Plan
 - MW-WAT11: Management of impact on abstraction boreholes
 - MW-WAT14: Surface water drainage
 - MW-WAT15: Monitoring of water resources
- Requirement 7: Contaminated Land and Groundwater
- Requirement 10: Drainage

Biodiversity

Protected species records

The surveys which have been conducted have some useful information which could be used more widely than just for this project. It should be considered whether the survey records collected e.g. otters, water voles, bats and great crested newts could be shared with the Wiltshire and Swindon Biological Records Centre.

Invasive Non-Native Species

As mentioned in the INNS report and management plan, the survey did not cover

aquatic INNS. This is disappointing as this project could help to contribute towards wider INNS control and help protect the River Avon and Till designated sites.

The Wiltshire Wildlife Trust would be a good contact as they have been working on NNIS removal in the Hampshire Avon catchment for a number of years. There are records of INNS including Japanese Knotweed (SU1490041900), Himalayan balsam along the River Avon, Monkey flower on the River Till and Giant Hogweed close to Normanton Down. We would encourage management of INNS in the project area to be wider than just construction areas and would recommend it included the River Avon and Till.

I hope this information is useful, but please contact me if you have any queries.

Yours faithfully

Miss Katherine Burt
Sustainable Places - Planning Specialist

Direct e-mail swx.sp@environment-agency.gov.uk