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Our ref: SO/2022/121848/01-L01
Your ref: TR010034/APP/5.5
Date: 14 January 2022

**For the attention of Edwin Mawdsley
Programme Officer**

Dear Sir/Madam

**Application by Highways England for an Order Granting Development Consent
for A57 Link Roads**

**The Examining Authority's draft first written questions and requests for
information**

**A57 Mottram Moor Link, Road Scheme. (formerly (previously known as Trans-
Pennine Upgrade).**

Our Written Representation provides an update on issues previously raised and confirms our current position. We have continued to work closely with the applicant to address the issues we raised through the preparation of a Statement of Common Ground (SoCG). (Document Reference: TR010034/EXAM/XX).

Yours faithfully

**Mrs SYLVIA WHITTINGHAM
Planning Advisor**

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Application by Highways England for an Order Granting Development Consent for A57 Link Roads - The Examining Authority's draft first written questions and requests for information

1.Land Condition (Geology and Soils)

We have reviewed the following sections of the Environmental Statement report:

- 6.3 Environmental Statement; Chapter 9 Geology and Soils dated June 2021
- 6.3 Environmental Statement; Chapter 13 Road Drainage and the Water Environment dated June 2021, and
- 7.6 Ground Investigation Report dated June 2021.

The ground investigation report is informative but there is a lack critical information to enable us to fully understand the ground conditions such as borehole logs, sampling results etc.

We also note that Arcadis have considered and used three previous ground investigations from 1995, 2004 and 2005 as well as a gap analysis from SOCOTEC in 2018. It should be noted that whilst the reports from 1995, 2004 and 2005 may be useful we would consider them out-of-date being around twenty years old now. This is especially concerning as the 2021 investigation appears to have focused entirely on information gaps rather than confirming the conditions from these much older reports – we refer to our comments of Dec 2020, which are included in table 4.1 of the Ground Investigation report.

Therefore, as with the two environmental statement chapters, we will accept this iteration of ground investigation reporting but believe additional work will likely be needed but that it can be addressed through the recommendation for appropriate conditions through the development consent which will govern this development.

We request that the applicant updates the GI report to reflect the latest ground conditions.

The applicant is required to a submit further information to support the DCO. Further information will be required and potentially additional monitoring/sampling to be undertaken.

We require that the Applicant should:

- Follow the risk management framework provided in Guidance on Land contamination risk management (LCRM), when dealing with land affected by contamination
- Refer to our [REDACTED] for the type of information that we require in order to assess risks to controlled waters from the site - the local authority can advise on risk to other receptors, such as human health
- Consider using the [REDACTED] which involves the use of competent persons to ensure that land contamination risks are appropriately managed
- Refer to the [REDACTED] pages on gov.uk for more information

All investigations of land potentially affected by contamination should be carried out by or under the direction of a suitably qualified competent person and in accordance with BS 10175 (2001) Code of practice for the investigation of potentially contaminated sites.

The submissions to date do not include important details such as investigation boreholes, sampling, and chemical data. We have also identified that this information is based upon older reports from before 2005. This information may no longer accurately reflect the contemporary standard of the condition of the land. We would urge the project team to consider whether the current ground investigation adequately updates these older reports to a level that reflects current land and groundwater conditions.

6.3 Environmental Statement - Chapter 13 - Road Drainage and the Water Environment

The applicant will need to submit further technical information and data. This additional monitoring may be required as part of the investigation and data gathering process to support the hydrogeological risk assessment important parts of the Water Resource Act Section 32 consent we not undertaken or completed. This information is therefore missing; this makes our assessment of the wider proposals de-watering sections of the road network and the accompanying hydrogeological risk assessment very difficult to accurately assess and we may not be able to agree to the proposal without this information.

We would recommend that the necessary information; including but not limited to a water features survey, be supplied in the first instance to the Environment Agency for its consideration.

5.5 Flood Risk Assessment – Chapter 4 – Assessment of Flood Risk

We have reviewed the FRA and require further information from the Applicant. The FRA needs to update the FRA with latest climate change allowances which were published in July 2021, as detailed in our letter to the Applicant on 15/11/2021 (our ref: SO/2020/120749/03-L01). The FRA should be updated to reflect the latest climate change allowances to ensure the design of the structure and proposed compensation are appropriate. We note your comment that the H95% flow figure has been assessed in relation to the bridge itself but would suggest that the latest climate change figures for the Upper Mersey catchment are considered to ensure compensatory storage is adequate.

6.3 Environmental Statement Chapter 13 - Road Drainage and the Water Environment

Following review of the Water quality (WQ) data, we identified that the groundwater contained elevated concentrations of specific substances with an Environmental Quality Standards (EQS) including cadmium, chromium, cyanide, manganese, and total PAH, and that they were unable to demonstrate compliance with the EQS. As the proposed discharge would provide most of the flow in the stream, *i.e.*, 60l/min discharge rate compared to 5l/min flow in the stream, there would be minimal dilution of the discharge, resulting in the stream being unsuitable for the proposed discharge. Therefore, we would recommend that alternative arrangements are sought for the disposal of the pumping test waters.

Statement of Common Ground (SoCG)

We welcome the inclusion of a Statement of common ground and will continue to work with the applicant to address the issues highlighted above to ensure that an appropriate level of assessment is undertaken and informs the detailed design and implementation of the proposed scheme. We will also work with the Applicant to update the SoCG.

EA consents (Advice to Applicant)

The applicant will need to apply for the relevant permits:

Dewatering permit from the Environment Agency.
Flood Risk Activity Permit