



Planning Inspectorate
National Infrastructure Directorate
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Our ref: XA/2024/100192/02-L01
Your ref: TR010063
Date: 27 November 2024

Dear Sir/Madam

EXAMINATION

M5 JUNCTION 10 IMPROVEMENTS SCHEME – DESIGN CHANGE APPLICATION 2

ISSUE SPECIFIC HEARING 5 (ISH5): TRAFFIC AND TRANSPORT, FUNDING AND ENVIRONMENTAL MATTERS - WATER QUALITY

M5 JUNCTION 10 GLOUCESTERSHIRE

The Environment Agency attended the Issue Specific Hearing on Environmental Matters held virtually on the 20 November 2024 and made oral submissions, summarised below, in relation to the following Agenda items.

Action 5: Filter drain versus Swales – what is the EA position and clarification on the reason for a different conclusion from the applicant and JC

The EA has reviewed its position in relation to the impact of the design changes on water quality. A misunderstanding led to our previous position, and we now acknowledge that Change 1 (West Cheltenham Link Road replacement of swales to filter drains) will lead to a lower level of treatment when compared to the treatment methods proposed in Design Fix 3.

The EA will always support and encourage the use of treatment methods with the highest treatment efficacy. We have reviewed *HEWRAT Assessment for DCO Change Requirements (Document Ref GCCM5J10-ARC-EWE-ZZ-TN-LE-00013)* and

acknowledge that, despite the proposed options with reduced treatment, the results from the updated HEWRAT assessment for Design Fix 4 indicate that all drainage catchments still pass all assessment criteria. This suggests an improvement when compared to results from the current scenario, as presented in Table 8-12 in *Chapter 8 (Road Drainage and the Water Environment) Environmental Statement (Ref: TR010063/APP/6.6, June 2024)*. Based on these results, although we would still like to encourage the use of swales over filter drains where feasible, we have no objections with regards to the water quality impacts from the changes proposed in Design Fix 4.

However, we have not reviewed the HEWRAT assessment methodology as a whole, as its methods are used widely across the country for various projects. For the purposes of this development consent application, we are reliant upon the assessment criteria being appropriate and sufficient for determining the level of acceptability for water quality impacts.

If you have any questions, please contact me.

Yours faithfully

Ms Noreen Nargas MRTPI

Planning Specialist

