

Following review of the impacts of Allenby including the scope to control construction impacts and the neutral impact upon abstraction levies, English Nature and the Environment Agency have advised that the proposal will not represent a significant impact upon the Avon, either alone or in combination with other projects.

**Outcome.**

Following the review of impacts and management structures capable of being controlled by the competent authority, Project Allenby can be removed from the "in combination" assessment and is considered not to have a significant impact upon the Avon.

**8.2 Project Allenby and its impact upon the Salisbury Plain cSAC.**

**Relevant impacts.**

Allenby has the scope to impact upon bird habitat through damage to calcareous grassland habitat within the wire, which offers similar habitat to the cSAC Salisbury Plain designation.

**Assessment.**

The Salisbury Plain cSAC is designated for its semi-natural dry grasslands, juniper formations on calcareous grasslands and semi-dry grasslands. Additionally, under the Birds Directive, the plain supports two nationally important species, the Stone Curlew and Hen Harrier.

Potential impacts could arise from construction programmes seasons and methods, deposition of dust, loss of habitat to development or enhanced recreational use.

The MoD is separately undertaking an appropriate assessment of the impacts of post Strategic Defence Review training upon the plain. Much of the changed training pattern has preceded the Allenby Garrison redevelopments. MoD therefore considers that Allenby's impact upon the conservation interests of the Salisbury Plain cSAC relates only to impact upon habitat within the garrison fence.

There is scope within the development framework for Project Allenby for the Planning Authority to require developers to demonstrate their commitment to minimising habitat take, and encouraging enhanced habitat within the overall garrison management plan. The overall area of habitat suited to the Stone Curlew and Hen Harrier within the garrison represents a minor element compared to the areas of designated habitat within the Plain cSAC.

**Outcome.**

The MoD is a competent authority for both Allenby and the ongoing management of the Salisbury Plain cSAC. The Council's only interest in plain management within their "competent authority" role for Allenby lies in considering the cumulative impact of other plans or projects. There is a link between Allenby and the use of the plain in that both represent post Strategic Defence Review responses.

Following consideration with the appropriate advisory body, the impact of Project Allenby upon the Salisbury Plain cSAC is not considered significant by the District Council. As competent authority for both projects however the MoD has responsibility for undertaking an appropriate assessment of both the future use of the Plain and Allenby's impact upon the Plain and river Avon.

### **8.3 Solstice Business Park, Amesbury & associated highway works to Folly Bottom.**

These schemes are included within the Appropriate Assessment as recent permissions, not implemented and therefore likely to play a key role informing any "in combination" assessment.

#### **Relevant impacts:**

- Construction methodology,
- Management of surface water drainage,
- Impact upon sewage treatment works
- Water demand from licensed abstractions,
- Impact upon floodplain.

#### **Assessment.**

The Solstice Business Park was granted permission (S/99/721) in outline for a mixed employment site. The permission preceded the cSAC designation therefore no Appropriate Assessment was undertaken at that stage.

A subsequent whole site outline application (S/02485) retaining original principles but varying timescales for submitting details provided an opportunity to address the cSAC implications but this issue was not picked up by either the Council or the appropriate agency.

The status of the various "development cells" at Solstice Park which are to be developed within the land use framework established by the outline consents has been considered by Counsel for the developer and their assessment has been reviewed by counsel for the District Council. This advice indicates UK courts would be unlikely to require an appropriate assessment for reserved matters submissions, however this matter has not been fully tested within the European Courts.

Certainly, where proposals at Solstice Park fall outside the framework of the outline consent, any full application could be considered in terms of need for an appropriate assessment. This approach has been adopted for the hotel and petrol station proposal (S/03/0028), submitted after the "cut off" established for this Appropriate Assessment.

The outline permission required the developers to submit surface water management proposals which has been done and agreed with English Nature and the Environment Agency. As a part of the surface drainage submission, the developers have confirmed compliance with Environment Agency Pollution Guidance.

The developers have submitted an assessment of whole site abstraction requirement and foul drainage based upon standard meterage based upon the differing use classes. This has been included in the "in combination" assessment to inform assessment of the undetermined proposals.

#### **Outcome.**

**The inclusion of Solstice Business Park serves to inform the wider appraisal. Where subsequent proposals at this site fall outside the framework of the outline consent then they will need to be considered in light of their potential impact upon the conservation interests behind the cSAC designation.**

#### **8.4 Housing development on land South of Boscombe Down, Amesbury.**

##### **Relevant impacts.**

- Run off during construction
- Pollution of groundwater during construction
- Increased effluent volume to be treated by Amesbury Sewerage Treatment Works
- Impact upon operational surface water run off arising from increased hard surfaced areas
- Increased demand for water impacting upon abstraction levels

##### **Assessment.**

The Council as the Competent Authority for this outline application must consider three key questions before determining this proposal.

1. Is it possible to construct the proposed development without risking accidental pollution of the River Avon during the development process?
2. What measures can be introduced into the development to control water demand and the disposal of surface water?
3. Can the operational requirements of the completed development (demand for water and increased volume of effluent requiring treatment) be acceptably accommodated without adverse impact upon the conservation interests within the River Avon.

These issues require differing levels of assessment.

Question 1 can be addressed on an "alone" rather than "in combination" basis. As with the treatment of Project Allenby above, an adequate construction management regime can be imposed to prevent pollution, either via surface water or ground water. As such the risk of construction pollution will not impact "in combination".

Question 2 sets out a future operational framework that addresses the developers' level of commitment to water efficient fittings, surface water drainage from new hard areas, water recycling and sustainable highway drainage. The answers to this question provide technical solutions arising from a single site and serve to inform the wider "In combination" assessment.

Question 3 represents the "In combination" assessment, considering whether the anticipated abstraction and foul effluent can be accommodated by the river and sewerage treatment works, in addition to the other plans or projects impacting upon the River Avon cSAC.

##### **Construction impacts.**

In response to the concerns relating to flooding or surface runoff from the construction site, or pollution of the groundwater during construction, the developers have submitted a construction methodology, setting out proposals for materials storage and use, bunding, control over liquids (and pesticides / herbicides) in storage, use and methods of disposal. The detail set out in the construction methodology is adequate to inform the Appropriate Assessment and satisfies the advisory agencies that the housing development can be constructed in a manner which protects the interests of the Avon.

##### **Operational water management.**

The development proposes a comprehensive surface water drainage system, incorporating best practice Sustainable Urban Drainage solutions including roadside swales. The internal roadways

and hard surfaces will include local attenuation and soakaways to reduce the direct impact of new hardsurfaces upon run off flow rates and downstream flood impacts.

To reduce overall water demand the developer proposes the following measures:

- Fit low flush toilets / cisterns,
- Install spray taps
- Urinals in public buildings to have flush control on timing device
- Provide water but to each dwelling
- Use of grey water recycling on all public buildings except primary school

The comprehensive approach taken by the developer has been welcomed by the advisory agencies.

#### **Conclusion.**

The housing scheme represents an increase in overall demand for water to be taken from the River Avon and levels of effluent to be treated locally before discharge back into the Avon. The commitments to water efficiency measures, drainage solutions and construction management can be controlled via a planning permission.

#### **Outcome.**

Treated on an "alone" basis the housing scheme can be shown not to adversely impact upon the River Avon. The key elements within this scheme requiring a wider assessment relate to water demand and effluent management within the wider supply / treatment capacities within the local River Avon catchment and sewerage treatment infrastructure.

The "In combination" assessment of this scheme will include the World Heritage Visitor Centre proposals and be informed by Project Allenby and the Solstice Park outline permission implications.

### **8.5 Stonehenge Visitor Centre.**

#### **Relevant impacts.**

- Construction pollution & run off
- Pollution of river from car park surface water run off
- Changes in pattern of run off from new hard surfaces
- Increased water demand impact upon abstraction
- Impact upon local sewerage treatment.

#### **Assessment.**

The proposers have outlined a construction methodology addressing the scope to pollute the Avon, either through flooding / surface run off through an exposed construction site, or via pollution of groundwater. This identifies issues such as open storage, storage of oil / fuel, containment of surface run off within designed lagoon.

A Sustainable Urban Drainage scheme including landscaping proposals addressing attenuation to Greenfield run off rates and petrol / oil interception and treatment has been submitted.

The development will be expected to attract 800,000 visitors per year with daily demand of 153 cu. m water. The development proposes water efficiency measures to include water efficient toilets, urinals and hand basins.

The development does not result in the loss of River Avon cSAC habitat.

**Conclusion.**

The submission of a construction methodology sets out a framework to ensure the delivery of a Visitor Centre can be achieved without adverse impact upon the Avon.

The commitments to water efficiency, construction management and the development of a comprehensive Sustainable Urban Drainage solution and associated landscaping scheme can be required either as a part of any detailed submission or by conditions.

**Outcome.**

The elements identified in the conclusion indicate that impacts upon the Avon can be addressed by proper planning controls. A wider assessment is however necessary and this relates to water demand and effluent treatment. This assessment will include the major housing scheme and be informed by Project Allenby and the Solstice Business Park planning approval.

**8.6 Countess Road junction improvements and undergrounding proposals for A.303.**

**Relevant impacts.**

Construction impact upon surface water runoff,  
Construction impact upon groundwater  
Impact upon groundwater through bored option  
Impact upon floodplain

**Assessment.**

The agents for the Highways Agency have been involved in lengthy discussions with both English Nature and the Environment Agency relating to the above issues.

The scheme proposes to control run off from the construction site in accordance with Environment Agency Best Practice Advice (CIRA Report C532) Measures will include wash down areas, disposal of waste, fuelling protection of locations and bunds.

Water requirements relating to construction can be achieved within Wessex Water supply proposals. No new sources of water will be required during construction. There are no post construction water resource issues.

Measures to avoid construction / operational impact upon the floodplain of either the Avon or River Till have been proposed. These include temporary haul route crossing the Till valley, bunds to protect the Till, temporary drainage measures to mitigate suspended materials and attenuate flows.

The Agents are developing solutions to anticipated impacts of the proposed route upon habitat including shading from bridge, impact of earthworks and shading from temporary causeway which will inform the Highways Agencies' own Appropriate Assessment as a Competent, and in this case, Determining Authority.