

## THE STONEHENGE ALLIANCE

Chairman: George McDonic, MBE, BL, DIPLTP, DPA, FFB

From the Hon Secretary, Dr Kate Fielden

Mr Derek Parody,  
Project Director for A303 Stonehenge  
Highways England,  
Temple Quay House,  
2 The Square, Temple Quay  
Bristol BS1 6HA.

Sent by email on 11 February 2018

Dear Mr Parody,

### **Environmental Information Regulations Request: A303 Stonehenge: Ref. no. 755,845**

Further to your correspondence with George McDonic in October to November last year, I would like you to know that Dr Reeves, specialist Engineering Geologist, is grateful for the information supplied by you to us on 1 November 2017, which he is currently assessing.

Much of the data supplied to us last year was out-of-date and incomplete, as you explained. In view of the start on 8 February 2017 of consultation on the preferred route for the A303 at Stonehenge, we would be grateful if you should, please, now release for Dr Reeves to consider, the up-to-date Site Investigation data on which the decision to proceed with the scheme consultation is based.

In particular, we would wish now to have access to the important relevant Site Investigation information that you have recently obtained (especially that from the recent/continuing? Structural Soils Ltd. drilling, sampling and groundwater monitoring activities) in the key areas which will be affected by the Stonehenge tunnel proposals. Information from the proposed portal sites, from the proposed rock cuts areas, and especially from the Stonehenge Bottom area, is obviously incomplete, as provided by Highways England to Stonehenge Alliance in your email reply and reports contained on the Compact Disk provided on November 1<sup>st</sup> 2017.

In your letter dated 1<sup>st</sup> November 2017 to our Chair, Mr. George McDonic, you stated:

*“Finally, I can confirm that we do hold some remaining information that is relevant to your request but regret to inform you of my decision not to disclose this at the current time. This data is based on a partial first phase geotechnical investigation that has not yet been completed, and comprises borehole logs, environmental testing data and water table monitoring.*

*As the data we currently hold is incomplete, the information you have requested is being withheld in reliance on the exemption in regulation(s) 12(4)(d) of the Environmental Information Regulations 2004.*

*In applying this exemption we have had to balance the public interest in withholding the information against the public interest in disclosure. The key public interest factors in favour of disclosure included that it could support organisational transparency, that it could generate a limited public understanding of the geology and hydrology of the local area, and that it could enable the public to understand how and what evaluations are done during the current stages of scheme’s development.*

*However, the key public interest factors against disclosure were that unprocessed and invalidated data is not in a format that could be readily understood or interpreted by the public, and that the data is still in the process of being collected and could therefore be misleading if used to form an assessment, which could create confusion when an assessment of the full set of data is published in the future. Further factors were that releasing the requested data could adversely impact the next stage of engagement when evaluation of the complete data is published, and that in its incomplete form, the information requested could be misrepresented in order to undermine the decision-making process.*

*We will be publishing this data once it has been validated, confirmed as accurate, and the investigations are completed.”*

We cannot understand how Highways England can be proceeding with the current formal Public Consultation process without this detailed information being now available.

If you are still unable to release this information to us, please would you let us know the following:

- i. which areas of the necessary survey work have not yet been undertaken, their locations and scope of work required;
- ii. the complete scope of the geotechnical data outstanding for assessment of the full viability of the A303 Stonehenge scheme;
- iii. whether information on investigation subsequent to that recorded in the Geotechnical Preliminary Sources Study Report (2016) will be now be made available to us; along with any other information withheld by you last November (based on a partial first phase geotechnical investigation, comprising borehole logs, environmental testing data and water table monitoring);

- iv. whether the site investigation data obtained to date has been passed to the British Geological Survey and, if not on public record, when it will be; and
- v. when the information currently lacking and withheld will be available for Dr Reeves (and indeed the public) to study.
- vi. In addition, please would you supply us with a paper copy of your detailed (1:10,000 or better) map/plan showing all the locations of the SI data points especially in relation to the proposed tunnel portal locations, and the proposed tunnel route.

We are concerned that the absence of this critical information makes it difficult for us to respond meaningfully to the current consultation on the A303 scheme. Certain information about the geotechnology and hydrogeology of the site is already in the public domain and a matter of concern to the general public. We hope that by Highways England providing the data we request for assessment by an independent specialist, it might be possible to consider fully the validity of those concerns well before a DCO application is made in the autumn of this year.

Yours sincerely,



Kate Fielden

Hon. Secretary, the Stonehenge Alliance

THE STONEHENGE ALLIANCE  
is supported by: Ancient Sacred Landscape Network;  
Campaign for Better Transport; Campaign to Protect Rural England;  
Friends of the Earth; and RESCUE: The British Archaeological Trust.