

A303 Sparkford to Ilchester Dualling Scheme TR010036

6.3 Environmental Statement Appendix 4.1 Scoping Opinion

APFP Regulation 5(2)(a)
Planning Act 2008

Infrastructure Planning (Applications: Prescribed
Forms and Procedure) Regulations 2009
July 2018



Infrastructure Planning

Planning Act 2008

**The Infrastructure Planning
(Applications: Prescribed Forms
and Procedure) Regulations
2009**

**A303 Sparkford to Ilchester Dualling
Scheme**

Development Consent Order 201[X]

**6.3 Environmental Statement
Appendix 4.1 Scoping Opinion**

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SCOPING OPINION:

Proposed A303 Sparkford to Ilchester

Case Reference: TR010036

Adopted by the Planning Inspectorate (on behalf of the
Secretary of State for Communities and Local Government)
pursuant to Regulation 10 of The Infrastructure Planning
(Environmental Impact Assessment) Regulations 2017

January 2018

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1. INTRODUCTION

1.1 Background

- 1.1.1 On 28 November 2017, the Planning Inspectorate (the Inspectorate) on behalf of the Secretary of State (SoS) received a scoping request from Highways England (the Applicant) under Regulation 10 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) for the proposed A303 Sparkford to Ilchester Dualling (the Proposed Development).
- 1.1.2 In accordance with Regulation 10 of the EIA Regulations, an Applicant may ask the SoS to state in writing its opinion *'as to the scope, and level of detail, of the information to be provided in the environmental statement'*.
- 1.1.3 This document is the Scoping Opinion (the Opinion) provided by the Inspectorate on behalf of the SoS in respect of the Proposed Development. It is made on the basis of the information provided in the Applicant's report entitled A303 Sparkford to Ilchester Dualling (the Scoping Report). This Opinion can only reflect the proposals as currently described by the Applicant. The Scoping Opinion should be read in conjunction with the Applicant's Scoping Report.
- 1.1.4 The Applicant has notified the SoS under Regulation 8(1)(b) of the EIA Regulations that they propose to provide an Environmental Statement (ES) in respect of the Proposed Development. Therefore, in accordance with Regulation 6(2)(a) of the EIA Regulations, the Proposed Development is EIA development.
- 1.1.5 Regulation 10(9) of the EIA Regulations requires that before adopting a scoping opinion the Inspectorate must take into account:
- (a) *any information provided about the proposed development;*
 - (b) *the specific characteristics of the development;*
 - (c) *the likely significant effects of the development on the environment;*
and
 - (d) *in the case of a subsequent application, the environmental statement submitted with the original application.*
- 1.1.6 This Opinion has taken into account the requirements of the EIA Regulations as well as current best practice towards preparation of an ES.
- 1.1.7 The Inspectorate has consulted on the Applicant's Scoping Report and the responses received from the consultation bodies have been taken into account in adopting this Opinion (see Appendix 2).
- 1.1.8 The points addressed by the Applicant in the Scoping Report have been carefully considered and use has been made of professional judgement and experience in order to adopt this Opinion. It should be noted that when it comes to consider the ES, the Inspectorate will take account of

relevant legislation and guidelines. The Inspectorate will not be precluded from requiring additional information if it is considered necessary in connection with the ES submitted with the application for a Development Consent Order (DCO).

- 1.1.9 This Opinion should not be construed as implying that the Inspectorate agrees with the information or comments provided by the Applicant in their request for an opinion from the Inspectorate. In particular, comments from the Inspectorate in this Opinion are without prejudice to any later decisions taken (eg on submission of the application) that any development identified by the Applicant is necessarily to be treated as part of a Nationally Significant Infrastructure Project (NSIP) or associated development or development that does not require development consent.
- 1.1.10 Regulation 10(3) of the EIA Regulations states that a request for a scoping opinion must include:
- (a) a plan sufficient to identify the land;*
 - (b) a description of the proposed development, including its location and technical capacity;*
 - (c) an explanation of the likely significant effects of the development on the environment; and*
 - (d) such other information or representations as the person making the request may wish to provide or make.*
- 1.1.11 The Inspectorate considers that this has been provided in the Applicant's Scoping Report. The Inspectorate is satisfied that the Scoping Report encompasses the relevant aspects identified in the EIA Regulations.
- 1.1.12 In accordance with Regulation 14(3)(a), where a scoping opinion has been issued in accordance with Regulation 10 an ES accompanying an application for an order granting development consent should be based on *'the most recent scoping opinion adopted (so far as the proposed development remains materially the same as the proposed development which was subject to that opinion)'*.
- 1.1.13 The Inspectorate notes the potential need to carry out an assessment under The Conservation of Habitats and Species Regulations 2017 (the Habitats Regulations). This document must be co-ordinated with the EIA, to avoid duplication of information between assessments.

1.2 The Planning Inspectorate's Consultation

- 1.2.1 In accordance with Regulation 10(6) of the EIA Regulations the Inspectorate has consulted the consultation bodies before adopting a scoping opinion. A list of the consultation bodies formally consulted by the Inspectorate is provided at Appendix 1. The consultation bodies have been notified under Regulation 11(1)(a) of the duty imposed on them by Regulation 11(3) of the EIA Regulations to make information available to the Applicant relevant to the preparation of the ES. The Applicant should

note that whilst the list can inform their consultation, it should not be relied upon for that purpose.

- 1.2.2 The list of respondents who replied within the statutory timeframe and whose comments have been taken into account in the preparation of this Opinion is provided, along with copies of their comments, at Appendix 2, to which the Applicant should refer in undertaking the EIA.
- 1.2.3 The ES submitted by the Applicant should demonstrate consideration of the points raised by the consultation bodies. It is recommended that a table is provided in the ES summarising the scoping responses from the consultation bodies and how they are, or are not, addressed in the ES.
- 1.2.4 Any consultation responses received after the statutory deadline for receipt of comments will not be taken into account within this Opinion. Late responses will be forwarded to the Applicant and will be made available on the Inspectorate's website. The Applicant should also give due consideration to those comments in carrying out the EIA.

1.3 Article 50 of the Treaty on European Union

- 1.3.1 On 23 June 2016, the United Kingdom (UK) held a referendum and voted to leave the European Union (EU). On 29 March 2017 the Prime Minister triggered Article 50 of the Treaty on European Union, which commenced a two year period of negotiations regarding the UK's exit from the EU. There is no immediate change to legislation or policy affecting national infrastructure. Relevant EU Directives have been transposed into UK law and those are unchanged until amended by Parliament.

2. THE PROPOSED DEVELOPMENT

2.1 Introduction

- 2.1.1 The following is a summary of the information on the Proposed Development and its site and surroundings prepared by the Applicant and included in their Scoping Report. The information has not been verified and it has been assumed that the information provided reflects the existing knowledge of the Proposed Development and the potential receptors/resources.

2.2 Description of the Proposed Development

- 2.2.1 The Applicant's description of the Proposed Development, its location and technical capacity (where relevant) is provided in the Scoping Report section 2.5.
- 2.2.2 The Proposed Development is to upgrade a section of the A303 by providing a continuous dual carriageway linking the Podimore Bypass and the Sparkford Bypass. The Proposed Development would include a new length of dual lane carriageway approximately 5km, generally following the existing road corridor.
- 2.2.3 Also included within the description of the Proposed Development is a new all movements grade separate junction north west of Hazlegrove Roundabout accommodating free flowing A303 traffic movements; a limited movement junction in the vicinity of Downhead; a connection between local roads to the north and south of the route in the vicinity of Canegore Corner via an overbridge and closure of the existing westbound slip road at Podimore village, access to Podimore village would be via the A303/A37 junction.
- 2.2.4 Additional features are identified as including drainage, landscaping, environmental mitigation, lighting, gantries, signage and utility diversions.
- 2.2.5 The proposed application site is on the A303 in Somerset located between the settlements of Podimore to the west and Sparkford to the east. The Royal Naval Air Station Yeovilton is located to the south west of the Proposed Development.
- 2.2.6 A site location plan is provided at Appendix B of the Scoping Report and depicts the extent of the Proposed Development including areas of temporary and permanent land take and proposed ecological mitigation areas.
- 2.2.7 The proposed application site is comprised of predominantly rural land with field patterns and intermittent individual properties. Residential and commercial buildings are found in the nearby settlements of Podimore and Sparkford.

- 2.2.8 Appendix A of the Scoping Report depicts the key designated features in proximity to the Proposed Development these include:
- two scheduled monuments;
 - one Site of Special Scientific Interest (SSSI) (Sparkford Wood);
 - two Conservation Areas (Queen Camel and West Camel); and
 - numerous Listed Buildings.
- 2.2.9 The eastern end of the Proposed Development would run through the southern part of Hazlegrove House (Grade II listed) Registered Park and Garden. 15 Local Wildlife Sites have been identified within 2km of the Proposed Development and two Local Geological Sites within 1km.
- 2.2.10 Five designated ecological sites have been identified within 200m of the affected road network. Three Special Areas of Conservation (SAC) designated for bat populations have been identified within 30km of the Proposed Development (Mells Valley, North Somerset and Mendip Bats and Bracket Coppice). There are no Areas of Outstanding Natural Beauty (AONB), National Parks or Heritage Coasts within 1km of the Proposed Development.

2.3 The Planning Inspectorate's Comments

Description of the Proposed Development

- 2.3.1 Paragraph 2.5.2 of the Scoping Report states that the maximum parameters (size and scale) of the Proposed Development are currently not known. The ES should contain full details of the maximum parameters applicable to the design of the Proposed Development, together with any limits of deviation. This should be shown on supporting plans.
- 2.3.2 The Scoping Report states that additional features include drainage, landscaping, environmental mitigation, gantries, signage and utility diversions. No further details have been provided in the Scoping Report. The description of the Proposed Development in the ES should also include the number of and dimensions for the various components applicable to the Proposed Development.
- 2.3.3 The Scoping Report makes reference to the need for construction compounds as part of the Proposed Development but no further details are provided. The ES should be clear in providing specific information regarding the number, size and location of the construction compounds and access arrangements. These should also be depicted on plans to provide further clarity for the reader.
- 2.3.4 The Scoping Report states that new lighting may be required during the construction and operational phases. It is identified in paragraph 8.8.3 of the Scoping Report that lighting columns are proposed at key junctions and that they will be kept to a minimum height. The ES should explain

the need for lighting during construction and operation and the impacts associated with lighting proposals should be assessed in the ES with evidence of how this has been taken into account in relevant aspect chapters.

- 2.3.5 Appendix B of the Scoping Report identifies areas of proposed permanent and temporary land take, as well areas to be used for proposed ecological mitigation. There is very limited information in the Scoping Report as to what the land take would be used for, though it does state that approximately 400,000m² of third party land would be required permanently. The ES should include a description of areas of permanent land take, including justification of why they are needed. The ES should also identify temporary land take areas and explain how long the land would be required. Land required for ecological mitigation should be clearly identified including how these areas will be used.
- 2.3.6 A number of access routes for Non-motorised Users (NMU) are shown on Appendix B to the Scoping Report, Environmental Constraints Plan and several are located within the redline boundary. However there is limited information provided in the Scoping Report as to what will happen to these access routes during construction and operation. Paragraph 13.8.2 of the Scoping Report states that a NMU strategy has been produced which includes the locations for diversions for NMU. The ES should describe the diversions which will be in place during construction and explain how long the diversions would be in place. Details should also be included for any permanent diversions. These should be illustrated on supporting plans.
- 2.3.7 The Scoping Report omits a detailed description of the nature and quantity of materials used and waste generated as they will be included in the later design process. The ES should include these details as part of the Proposed Development and include justification of any key assumptions made.
- 2.3.8 Diversions and a road closure are highlighted throughout the Scoping Report as being required for the Proposed Development. The ES should contain a full explanation of road closures and diversions including whether they are permanent or temporary.
- 2.3.9 The Scoping Report notes that there is a need to demolish one farm building to enable the Proposed Development. No further details are provided in the Scoping Report. The ES should provide further details and clearly identify the location of the structure on a supporting plan.
- 2.3.10 Construction of the Proposed Development is anticipated to last five years. The ES should provide details regarding proposed working hours, including for weekends and bank holidays.

Alternatives

- 2.3.11 The EIA Regulations require that the Applicant provide 'A description of the reasonable alternatives (for example in terms of development design, technology, location, size and scale) studied by the developer, which are

relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects’.

- 2.3.12 The Inspectorate would expect to see a discrete section in the ES that provides details of the alternatives considered and the reasoning for the selection of the chosen option(s), including a comparison of the environmental effects.

Flexibility

- 2.3.13 The Applicant’s attention is drawn to the Inspectorate’s Advice Note 9 ‘Using the ‘Rochdale Envelope’’¹, which provides additional details on the recommended approach.
- 2.3.14 The Applicant should make every attempt to narrow the range of options and explain clearly in the ES which elements of the Proposed Development have yet to be finalised and provide the reasons. At the time of application, any Proposed Development parameters should not be so wide-ranging as to represent effectively different developments. The development parameters will need to be consistently and clearly defined in the draft DCO (dDCO) and in the accompanying ES. It is a matter for the Applicant, in preparing an ES, to consider whether it is possible to robustly assess a range of impacts resulting from a large number of undecided parameters. The description of the Proposed Development in the ES must not be so wide that it is insufficiently certain to comply with the requirements of Regulation 14 of the EIA Regulations.
- 2.3.15 It should be noted that if the Proposed Development changes substantially during the EIA process and prior to submission of the DCO application, the Applicant may wish to consider requesting a new scoping opinion.
- 2.3.16 The Scoping Report omits details relevant to the design of the Proposed Development including the anticipated size and scale of specific components eg gantries, lighting, and environmental mitigation proposals. The ES should include a detailed description of the Proposed Development including its individual components any uncertainties or assumptions regarding the design should be appropriately addressed perhaps through suitable use of design parameters.

¹ Advice Note nine: Using the Rochdale Envelope. 2012. Available at: <https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/>

3. EIA APPROACH

3.1 Introduction

- 3.1.1 This section contains the Inspectorate's specific comments on the scope and level of detail of information to be provided in the Applicant's ES. General advice on the presentation of an ES is provided in the Inspectorate's Advice Note 7 'Environmental Impact Assessment: Preliminary Environmental Information, Screening and Scoping'² and associated appendices.
- 3.1.2 Aspects/matters are not scoped out unless specifically addressed and justified by the Applicant, and confirmed as being scoped out by the Inspectorate. The ES should be based on the Scoping Opinion in so far as the Proposed Development remains materially the same as the Proposed Development described in the Applicant's Scoping Report. The Inspectorate has set out in this Opinion where it has/has not agreed to scope out certain aspects or matters on the basis of the information available at this time. The Inspectorate is content that this should not prevent the Applicant from subsequently agreeing with the relevant consultees to scope such aspects/matters out of the ES, where further evidence has been provided to justify this approach. However, in order to demonstrate that the aspects/matters have been appropriately addressed, the ES should explain the reasoning for scoping them out and justify the approach taken.
- 3.1.3 Where relevant, the ES should provide reference to how the delivery of measures proposed to prevent/minimise adverse effects is secured through DCO requirements (or other suitably robust methods) and whether relevant consultees agree on the adequacy of the measures proposed.
- 3.1.4 The Inspectorate notes the concern expressed by Somerset County Council (SCC) that the traffic model may not be a sufficiently detailed model to understand local re-routing impacts such as those arising from reducing the number of access points to the A303. It is essential that the assessment of likely significant effects is undertaken on the basis of robust and reliable information. The Applicant should ensure that the model used to inform the assessments is sufficient for this purpose. The Applicant should make effort to agree this approach with relevant stakeholders including SCC. Impacts from local re-routing during construction and operation should be identified and assessed in the ES.

² Advice Note seven: Environmental Impact Assessment: Preliminary Environmental Information, Screening and Scoping. Available from: <https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/>

3.2 Relevant National Policy Statements (NPSs)

- 3.2.1 Sector-specific NPSs are produced by the relevant Government Departments and set out national policy for NSIPs. They provide the framework within which the Examining Authority (ExA) will make their recommendation to the SoS and include the Government's objectives for the development of NSIPs. The NPSs may include environmental requirements for NSIPs, which Applicants should address within their ES.
- 3.2.2 The designated NPS relevant to the Proposed Development is the NPS National Networks (NPSNN)

3.3 Scope of Assessment

General

- 3.3.1 The Inspectorate recommends that in order to assist the decision-making process, the Applicant uses tables:
- to demonstrate how the assessment has taken account of this Opinion;
 - to identify and collate the residual effects after mitigation for each aspect, including the relevant interrelationships and cumulative effects;
 - to set out the proposed mitigation and/or monitoring measures including cross-reference to the means of securing such measures (eg a dDCO requirement);
 - to describe any remedial measures that are identified as being necessary following monitoring; and
 - to identify where details are contained in the Habitat Regulations Assessment (HRA) report (where relevant), such as descriptions of European sites and their locations, together with any mitigation or compensation measures, are to be found in the ES.
- 3.3.2 The ES should include details of difficulties (for example technical deficiencies or lack of knowledge) encountered compiling the required information and the main uncertainties involved.
- 3.3.3 The Inspectorate considers that where a DCO application includes works described as 'associated development', that could themselves be defined as an improvement of a highway, the Applicant should ensure that the ES accompanying that application distinguishes between; effects that primarily derive from the integral works which form the proposed (or part of the proposed) NSIP and those that primarily derive from the works described as associated development, for example through a suitably compiled summary table. This will have the benefit of giving greater confidence to the Inspectorate that what is proposed is not in fact an additional NSIP defined in accordance with s22 of the PA2008.

Baseline Scenario

- 3.3.4 The ES should include a description of the baseline scenario with and without implementation of the development as far as natural changes from the baseline scenario can be assessed with reasonable effort on the basis of the availability of environmental information and scientific knowledge.

Forecasting methods or evidence

- 3.3.5 The ES should contain the timescales upon which the surveys which underpin the technical assessments have been based. For clarity, this information should be provided either in the introductory chapters of the ES (with confirmation that these timescales apply to all chapters), or in each aspect chapter.
- 3.3.6 The Inspectorate expects the ES to include a chapter setting out the overarching methodology for the EIA, which clearly states which effects are 'significant' and 'non-significant' for the purposes of the EIA. Any departure from that methodology should be described in individual aspect assessment chapters.
- 3.3.7 The ES should include details of difficulties (for example technical deficiencies or lack of knowledge) encountered compiling the required information and the main uncertainties involved.

Residues and emissions

- 3.3.8 The EIA Regulations require an estimate, by type and quantity, of expected residues and emissions. Specific reference should be made to water, air, soil and subsoil pollution, noise, vibration, light, heat, radiation and quantities and types of waste produced during the construction and operation phases, where relevant. This information should be provided in a clear and consistent fashion and may be integrated into the relevant aspect assessments.
- 3.3.9 Commentary to be provided only if there is an issue or omission in relation to water, air, soil and subsoil pollution, noise, vibration, light, heat, radiation and quantities and types of waste produced during the construction and operation phases or GHG. Specific areas to consider include impact on soil, farming production and field drainage.

Mitigation

- 3.3.10 Any mitigation relied upon for the purposes of the assessment should be explained in detail within the ES. The likely efficacy of the mitigation proposed should be explained with reference to residual effects. The ES should also address how any mitigation proposed is secured, ideally with reference to specific DCO requirements or other legally binding agreements.

Vulnerability of the development to risks of major accidents and/or disasters

- 3.3.11 The ES should include a description of the potential vulnerability of the Proposed Development to risks of major accidents and/or disasters, including vulnerability to climate change, which are relevant to the Proposed Development. Relevant information available and obtained through risk assessments pursuant to European Union legislation such as Directive 2012/18/EU of the European Parliament and of the Council or Council Directive 2009/71/Euratom or relevant assessments carried out pursuant to national legislation may be used for this purpose provided that the requirements of this Directive are met. Where appropriate, this description should include measures envisaged to prevent or mitigate the significant adverse effects of such events on the environment and details of the preparedness for and proposed response to such emergencies.
- 3.3.12 Paragraphs 5.1.7-5.1.9 of the Scoping Report explain the Applicant's proposed approach to the assessment of impacts associated with major accidents and/or disasters. The scope of the assessment will cover vulnerability of the Proposed Development to risks of major accidents and/or disasters and any consequential impacts on the environment. Rather than being considered as a separate chapter in the ES, the Applicant proposes to assess these impacts within each relevant aspect area of the ES.

Transboundary effects

- 3.3.13 Schedule 4 Part 5 of the EIA Regulations requires a description of the likely significant transboundary effects to be provided in an ES. The Inspectorate notes that the Applicant has not indicated in the Scoping Report whether the Proposed Development is likely to have significant impacts on another European Economic Area (EEA) State.
- 3.3.14 Regulation 32 of the EIA Regulations inter alia requires the Inspectorate to publicise a DCO application on behalf of the SoS if it is of the view that the proposal is likely to have significant effects on the environment of another EEA state, and where relevant, to consult with the EEA state affected.
- 3.3.15 The Inspectorate considers that where Regulation 32 applies, this is likely to have implications for the examination of a DCO application. The Inspectorate recommends that the ES should identify whether the Proposed Development has the potential for significant transboundary impacts and if so, what these are and which EEA States would be affected.

A reference list

- 3.3.16 A reference list detailing the sources used for the descriptions and assessments must be included in the ES.

3.4 Confidential Information

- 3.4.1 In some circumstances it will be appropriate for information to be kept confidential. In particular, this may relate to information about the presence and locations of rare or sensitive species such as badgers, rare birds and plants where disturbance, damage, persecution or commercial exploitation may result from publication of the information. Where documents are intended to remain confidential the Applicant should provide these as separate paper and electronic documents with their confidential nature clearly indicated in the title, and watermarked as such on each page. The information should not be incorporated within other documents that are intended for publication or which the Inspectorate would be required to disclose under the Environmental Information Regulations 2014.

4. ASPECT BASED SCOPING TABLES

4.1 Air Quality

(Scoping Report section 6)

The study area for the Proposed Development will cover human health receptors and nationally designated ecological sites within 200m of roads that are likely to be affected by the Proposed Development. There are no Air Quality Management Areas (AQMA) located in the study area; the nearest AQMA is 7km away in Yeovil. The closest designated ecological site is Sparkford Wood which is located 1.2km to the north east of the Proposed Development. Four further SSSIs have been identified within 200m of the Affected Road Network (ARN). The Scoping Report notes that the ARN identified for previous environmental assessment undertaken during route option selection covered a 90km section of the A303 from Winterbourne Stoke to Buckland St Mary. The ARN for the Proposed Development is to be updated and the updates will apply recent traffic forecasts (mostly updating the committed developments within the uncertainty log), it is anticipated the ARN for the Proposed Development will cover a similar extent to that used previously.

The Proposed Development would be assessed in accordance with:
National Policy Statement for National Networks;
DMRB Volume 11, Section 3, Part 1 (HA 207/01);
Interim Advice Note (IAN) 170/12;
IAN 174/13;
IAN175/13;
IAN185/15.

A simple level assessment would be carried out for the operational stage, this would include the assessment of air quality using Atmospheric Dispersion Modelling System (ADMS) roads, verification of model outputs with local monitoring data and prediction of NO₂ and PM₁₀ concentrations in the base year and opening year 'do minimum' and 'do something' scenarios.

Potential impacts during construction are identified as impacts to sensitive receptors from dust emissions arising from construction activities and vehicle movements. During the operational phase, the Proposed Development has the potential to directly affect ambient concentrations of NO₂ and PM₁₀ as the change in road alignment has the potential to introduce a new source of traffic pollution and affect traffic flows and speeds.

No matters have been proposed to be scoped out of the assessment.

ID	Para	Applicant's proposed matters to scope out	Inspectorate's comments
1	Table 6.4		No matters are proposed to be scoped out from the air quality assessment
2	6.10	Scope of assessment	No reference is made to the need for PM_{2.5} to be considered as a specific pollutant within the assessment. The Inspectorate considers that the ES should include an assessment of impacts associated with increased PM_{2.5} resulting from the Proposed Development. In determining significance the assessment should take into account performance against relevant target/limit values.
	Para	Other points	Inspectorate's comments
3	6.2.2	Study Area	The ES should include a plan or figure to depict the extent of the ARN and identify the sensitive receptors; both human and ecological which may be impacted by the Proposed Development.
4	6.3.7	Baseline	The Scoping Report identifies that diffusion tube monitoring has taken place over 6 months at 16 locations along roads near the Proposed Development. The dates of these surveys, together with the locations and justification of why the locations were selected should be included within the ES.
5	6.3.12	Baseline	The Scoping Report identifies that there are approximately 200 residential properties within 200m of the Proposed Development. It is not clear whether this includes the properties within 200m of the redline boundary or within 200m of the ARN. The ES should clearly set out the type and quantity of receptors identified within 200m of the ARN.
6	6.3.8 and 6.7.4	Effects in ecological receptors	The ES should clearly identify those designated sites which may be impacted by changes in air quality, identifying those sites where the critical loads may be exceeded. The need to consider other sensitive nature conservation sites should be established through consultation with the relevant statutory consultees.
7	6.7.2 and	Construction compounds	The Scoping Report states that once the locations of the construction compounds

	6.12.2		are known, then the potential impacts will be reassessed as part of the ES in relation to any nearby designated sites. The ES should also assess whether the location of the construction compounds may have any impacts on human health and wellbeing.
8	6.11.11 and 6.12.4	Assessment of impacts	The Scoping Report states that potential concentrations of NO _x will be assessed in relation to designated sites. If it is concluded that there may be a significant impact, a briefing note would be prepared by the ecologist for the Proposed Development and submitted to Natural England (NE) in accordance with IAN 174/13. In the event that this occurs, details should be included within the ES together with details of mitigation measures proposed to reduce significant impacts.

4.2 Cultural Heritage

(Scoping Report section 7)

The assessment for cultural heritage is based upon a 1km study area which will be agreed with relevant consultees.

The method for appraising the baseline conditions involved a desk based study and was undertaken in accordance with published standards and guidance included within DMRB Volume 11, Section 3, Part 2: Cultural Heritage and relevant guidance documents from Historic England. The site visit was restricted to external visual inspection from publicly accessible areas only.

The cultural heritage assessment will consider both designated and non-designated assets, including scheduled monuments, listed building, registered parks and gardens, non-designated below ground archaeological remains, locally recorded historically important buildings, locally important buildings or structures during survey work, historic landscapes and conservation areas. Temporary and permanent impacts during construction and operation will be assessed.

Potential impacts during construction are identified as:

- presence of construction plant, materials, compounds and lighting would have potentially direct adverse impacts on setting of both designated and non-designated assets; and
- potential direct adverse impacts on below ground archaeological remains

Potential impacts during operation are identified as:

- presence of faster moving traffic would have potential to adversely impact the setting of some heritage assets.

The Applicant proposes to scope out impacts during operation on below ground archaeological remains.

ID	Para	Applicant's proposed matters to scope out	Inspectorate's comments
1	7.9.4 Table 7.3	Below ground archaeological deposits	Below ground archaeological remains would not be affected by the operation of the Proposed Development and therefore no operational effects are anticipated. The Inspectorate agrees that this matter can be scoped out from assessment in the ES.
	Para	Other points	Inspectorate's comments
2	7.2.1	Study Area	The assessment will be based upon a 1km study area. DMRB HA208/07 does not specify particular distances for study areas. The Applicant should justify the study area(s) adopted for the Proposed

			Development; the study area should be established having regard to the extent of likely impacts. The study area should be agreed with Historic England.
3	7.4.2	Intrusive and non-intrusive investigations	The Scoping Report has not specified the need for intrusive and non-intrusive archaeological surveys. Any such need will be informed by the desk study and site walkover assessment. The Applicant should discuss and agree the need for intrusive or non-intrusive survey work with the South West Heritage Trust and relevant local authority officers.
4	7.4.3	Non designated built heritage assets	The extent of non-designated heritage assets along the Proposed Development has not yet been determined or examined. The Applicant should discuss if there are relevant non designated heritage assets that should be assessed with the South West Heritage Trust and relevant local authority officers as appropriate. The discussions should be informed following completion of the desk study and site walkover assessment.
5	7.6.3	Geophysical survey	It is unclear what is meant regarding the consultation undertaken in August 2017 with Historic England and the South West Heritage Trust regarding the geophysical survey. This should be clarified within the ES.
6	7.8.1	Mitigation	The Scoping Report explains that preservation of archaeological remains in situ would be explored during the design process and best practice measures to limit impacts on heritage assets would be employed during construction through the implementation of a Construction Environmental Management Plan (CEMP). The Applicant should show that they have discussed and agreed these approaches with the South West Heritage Trust and officers from relevant local authorities.

4.3 Landscape and Visual

(Scoping Report section 8)

To accord with the guidance given in DMRB Volume 11 Section 3 Part 5, Landscape Effects, the study area for the assessment will extend 1km from the limits of the Proposed Development. However, the study area will be extended for any receptors located outside of the 1km which have the capacity to experience significant effects as a result of the Scheme

The Scoping Report indicates that the assessment will follow guidance and best practice, with particular reference to:

- DMRB Volume 11 Section 3 Part 5 Landscape Effects;
- Interim Advice Note 135/10 Landscape and Visual Effects Assessment;
- Guidelines for Landscape and Visual Impact Assessment; and,
- Landscape and Seascape Character Assessments.

Potential impacts during construction are identified as:

- visual impacts from clearance of vegetation; and
- temporary impacts in landscape character from the presence of construction plant, materials, machinery, construction compounds and the provision of construction lighting.

Potential impacts during operation are identified as:

- impacts on visual receptors resulting from the removal of existing vegetation, the introduction of a dual carriageway, associated infrastructure and passing traffic;
- impacts to the wider landscape character; and
- loss of existing vegetation causing a change in local landscape character.

Landscape and visual impacts would be experienced by, but not limited to residential receptors, PRow and road users.

No matters have been proposed to be scoped out of the assessment.

ID	Para	Applicant's proposed matters to scope out	Inspectorate's comments
1			No matters are proposed to be scoped out from the landscape and visual impact assessment.
	Para	Other points	Inspectorate's comments
2	8.2.1	Study area	The Scoping Report states that the study area is 1km from the limits of the Proposed Development. However, this boundary is not clearly defined in the Scoping Report making it uncertain what the actual extent

			of the study area is. The Inspectorate assumes that 1km from the scheme means 1km from the redline boundary indicated in Appendix B of the Scoping Report but this should be clearly presented in the ES. DMRB HA208/07 does not specify particular distances for study areas. The Applicant should seek to agree with relevant consultees and justify the study area(s) adopted for the assessment in their ES.
3	8.4.2	Night time lighting	If night time lighting is required during construction or operation, the visual impact on residential receptors should be assessed, including use of night-time photomontages where appropriate.
4	8.6.2	View point selection	The Inspectorate welcomes the Applicant's commitment to consult with relevant local planning authorities to discuss and agree the final selection of representative viewpoints for inclusion in the ES.
5	8.7.3	Impact from construction and operation	The Inspectorate is aware that the raised section of road west of Camel Hill will be particularly prominent and may result in visual impacts. The ES should assess these impacts and the Applicant is referred to comments from Queen Camel Parish Council (PC) and West Camel PC in this regard.
6	8.8.3	Lighting columns	The ES should ensure that the location and anticipated height of new lighting columns is included within the Landscape and Visual Impact Assessment.

4.4 Geology and Soils

(Scoping Report section 9)

The study area for the assessment of geology and soils comprises of a 500m buffer zone around the Proposed Development. A wider area will be used for the study area for the assessment of hydrological and hydrogeological features. The study area for groundwater will be the potential zone of impact established for during construction and operation.

No reference has been made to a methodology. Geology and Soils will be assessed using the guidance from DMRB Vol.11 Section 3 Part 11, Environmental Protection Act 1990 (amended 1995) and the Environmental Protection (Duty of Care) Regulations 1991 (amended 2003).

Potential Impacts during construction include the contamination of soils, groundwater and surface water, the creation of new contamination pathways, the mobilisation of existing contaminants and the removal/ sterilisation of superficial deposits and soils.

The Inspectorate has provided comments below on matters that the Applicant has proposed to scope out of the EIA.

ID	Para	Applicant's proposed matters to scope out	Inspectorate's comments
1	9.7.8	Potential Impacts during Operation	The Inspectorate agrees that this matter can be scoped out as no potential impacts on geology and soils are expected to occur during operation.
	Para	Other points	Inspectorate's comments
2	9.2.2	Study area	The study area for hydrogeology and hydrology lacks clarity as the Scoping Report states that a 'wider area is considered to be appropriate' but provides no definition of what this might be. The Applicant should provide a definition of 'wider area' within the ES, ensuring that it appropriately reflects the anticipated extent of potential impacts.
3	9.2.2	Study Area	The Inspectorate notes that the study area for geology and soils does not include the whole Local Geological Site (LGS) and Local Wildlife Site (LWS) areas. The Applicant should avoid using an arbitrary figure for the study area within the ES, and utilise a justifiable study area that encompasses the extent of the anticipated impact.

4	9.3.19 Table 9.1	Baseline	Table 9.1 of the Scoping Report refers to the chainage but no plan or figure has been provided. If chainage is used as a point of reference in the ES then a plan or figure should be provided with chainage appropriately labelled to support the reader.
5	9.8	Design, Mitigation and Enhancement Measures	The Applicant states that a CEMP, Materials Management Plan (MMP), Site Waste Management Plan (SWMP) and a Soil Management Plan (SMP) will be utilised to provide mitigation during construction. These management plans should include specific and sufficient detail to ensure efficacy and be included within the ES.
6	N/A	Methodology	The Scoping Report states that the DMRB Volume 11 Section 3 Part 11, the Environmental Protection Act 1990 and the Environmental Protection Regulations 1991 will be utilised when undertaking the assessment of Geology and Soils. However, there is no specific detail as to the methodology for the assessment. The ES should outline the methodology and detail how the assessment of geology and soils will be undertaken.

4.5 Biodiversity

(Scoping Report section 10)

The study areas differ for the various types of ecological receptors, they are as follows:

- 2km from the boundary of the Proposed Development for internationally and national designated sites;
- 200m from the ARN which covers an extent of approximately 90km and ranges from Wimbourne Stoke to Buckland St Mary;
- 200m for Ancient Woodland and Biodiversity Action Plan habitats;
- 30km for SACs designated for bat populations;
- 1km from the boundary for locally designated nature conservation sites, priority habitats, local wildlife sites and RSPB reserves;
- 500m from the boundary for preliminary ecological assessments i.e. Phase 1 habitat survey and Habitat Suitability Index assessment for Great Crested Newts;
- 250m from boundary for species such as water vole, otter, dormouse, reptiles and breeding birds; and
- 1.5km from boundary for barn owls.

The survey and assessment will be undertaken in accordance with DMRB Volume 11, Section 3, Part 4 'Ecology and Nature Conservation', IAN 130/10 and Chartered Institute of Ecology and Environmental Management (CIEEM) guidelines.

Potential impacts during construction are identified as:

- impacts from vegetation clearance upon species such as badgers and barn owls;
- increased risk of a pollution incident;
- disturbance and removal of habitats at Hazlegrove Park Local Wildlife Site (LWS); and
- night time works resulting in noise, vibration and lighting.

Potential impacts during operation are:

- permanent loss and severance of habitats of biodiversity value.

No matters have been proposed to be scoped out of the assessment.

ID	Para	Applicant's proposed matters to scope out	Inspectorate's comments
1			No matters are proposed to be scoped out from the assessment on biodiversity.

	Para	Other points	Inspectorate's comments
2	10.2.1	Study Area	A distance of 2km may not be appropriate for water dependent SSSI's downstream of the Proposed Development. The Applicant should seek to agree the study area for water dependant SSSIs with the Environment Agency (EA), such as Wet Moor SSSI.
3	10.3.8	Surveys	The Scoping Report states that surveys have been carried out for protected and notable species, including barn owls. Barn owl surveys are not reported in Appendix C of the Scoping Report. The ES should contain the results of all surveys, including for barn owls.
4	10.6.1 – 10.6.2	Consultation	The Inspectorate welcomes the Applicant's commitment to consult with NE and the relevant local planning authorities to discuss and agree an ecological mitigation strategy. The final strategy should be sufficiently detailed to ensure efficacy and details of how it would be secured in the DCO.
5	10.7.3	Impact on bats	The impact of the lighting design and use of lighting during construction; on protected species (eg bats) and the potential to cause severance to flight paths should also be considered. The full impact of the Proposed Development on foraging bats should be assessed.
6	10.8.5	Ecological mitigation areas	Appendix B of the Scoping Report identifies 5 land parcels to be used for ecological mitigation. The Scoping Report states this may include receptor areas for species such as reptiles or newts or for habitat creation. The ES should contain details of each ecological mitigation area together with details regarding its size, and what it would be used for. The Applicant should consult relevant stakeholders regarding the development of ecological mitigation areas. In particular the County Ecologist and the Forestry Commission (FC), should be consulted to ensure that opportunities to maximise the performance of these areas are realised. The Applicant should assess the residual loss of priority habitat or habitat supporting priority species and decide whether this

			should be addressed via the creation of compensatory areas or provision of financial compensation.
7	10.8.6	Surveys	The Scoping Report refers to a breeding bird survey which was undertaken in August 2017. Appendix C of the Scoping Report refers to an overwintering bird survey. It is not clear if both have been undertaken. To avoid confusion, surveys should be reported accurately in the ES.
8	10.8.7	Surveys	The Scoping Report refers to National vegetation classification survey and hedgerow surveys but the findings of these are not documented in the Scoping Report. The ES should report the findings of all surveys and take the results into account in the assessments.

4.6 Materials

(Scoping Report section 11)

The study area for the generation of waste will be the Proposed Development's red line boundary. The assessment for the removal of waste and the waste facilities encompasses the County of Somerset.

The Proposed Development will be assessed in accordance with the NPSNN and the DMRB Volume 11, Section 2, Part 4 and Part 5. A DMRB detailed level of assessment will be carried out and will assess the use of material resources as well as the generation and management of waste.

Potential impacts during construction are identified as the depletion of natural resources, the adverse impact the life cycle of the materials will have on the environment, the temporary occupation of waste management facilities and the permanent reduction in landfill capacity.

The Inspectorate has provided comments below on matters that the Applicant has proposed to scope out of the EIA.

ID	Para	Applicant's proposed matters to scope out	Inspectorate's comments
1	11.7.1	Assessment of the environmental effects of the extraction, processing and manufacturing of materials.	The Inspectorate agrees that this matter can be scoped out of the ES as the Scoping Report has not identified that this matter will cause any significant environmental effects. Furthermore, each stage of the extraction, processing and manufacturing of materials would already have been subject to their own environmental assessment.
2	11.12.1	Use of materials and generation of waste during operation.	The Inspectorate agrees that this matter can be scoped out due to the minimal materials resources and waste generated during the operational phase of the Proposed Development making it unlikely to cause significant environmental effects.
	Para	Other points	Inspectorate's comments
3	N/A	Impacts of depleting materials	The Scoping Report lacks evidence that an assessment of the effects the Proposed Development will have on the materials listed in 11.7.2. An assessment of the potential effects that the Proposed Development will have on the market for these materials should be included within the ES.
4	11.2.2	Study Area	The study area for the assessment of waste

			lacks sufficient justification. The Applicant should ensure that the study area is determined by the extent of potential impacts and not by an arbitrary geographical boundary.
5	11.3	Baseline	No reference has been made to utilising a future baseline. A future baseline forecasting the availability of resources and waste infrastructure should be included within the ES.
6	11.8	Design and Mitigation	The Scoping Report references the usage of a CEMP, SWMP and MMP to provide mitigation measures. The Applicant should ensure that these documents are cross referred to the ES and secured through the DCO in sufficient detail to ensure efficacy.
7	11.10	Proposed Level and Scope of Assessment	The Scoping Report lacks any discussion of the removal/ treatment of hazardous waste arisings or the availability of hazardous waste treatment infrastructure. The Applicant should include an assessment of the treatment/ removal of hazardous waste within the ES.
8	11.10.4	Proposed Level and Scope of Assessment	The Scoping Report references paragraph 11.7.9 which should state that 'there would be minimal requirements for waste during operation of the Proposed Scheme' but no paragraph with this reference is within the Scoping Report.

4.7 Noise and Vibration

(Scoping Report section 12)

The study area is to be defined using DMRB Volume 11 Section 3 Part 7 which is 500m from the works for the operational stage and potential extension to existing road network for the construction stage.

The Scoping Report sets out that a detailed assessment under DMRB will be undertaken. A quantitative assessment is proposed for both construction and operation assessments.

The Scoping Report sets out that a qualitative assessment will be undertaken for night time working in accordance of HD213/11.

For the construction vibration assessment a peak particle velocity (PPV) of 1.0mm/s or above is deemed significant adverse effect.

The Scoping Report identifies that there are potential impacts from noise and vibration for sensitive receptors for a temporary period during construction. There is also potential for adverse impacts to vulnerable buildings through vibration. During operation there is the potential for changes in traffic flows and road alignment which may result in noise impacts.

No matters have been proposed to be scoped out of the assessment.

ID	Para	Applicant's proposed matters to scope out	Inspectorate's comments
1			No matters are proposed to be scoped out from the assessment on noise and vibration.
	Para	Other points	Inspectorate's comments
2	Paras 12.2.1 – 12.2.4	Study Area	The Scoping Report states the study area will follow DMRB Volume 11 Section 3 Part 7 which sets out a study area of 1km from the works for operational noise. For construction, this study area 'may be extended to assess effects from construction traffic on the existing road network'. The Scoping Report does not explain how receptors will be determined and there is no clear evidence as to how the locations of sensitive receptors and extent of likely impacts have been taken into account in determining the study area. The ES should clearly explain the methodology adopted for the assessment

			along with the method used to identify the receptors and study areas, ensuring that a robust assessment is carried out. The Applicant should seek to obtain agreement of the methodology with the Local Planning Authority (LPA) as stated in DMRB.
3	12.2.4	Study area	The Scoping Report states that 'the extent of the assessment will be limited to areas where total noise (calculated construction noise plus baseline noise) exceeds the baseline noise levels.' The Scoping Report does not set out how this will be assessed.
4	12.3.2	Baseline	The Scoping Report does not list any noise monitoring undertaken by the LPA in its sources for the desk study. The ES should set out whether such information exists and whether it has been taken into account.
5	12.4.1	Assumptions	The paragraph discusses noise surveys; however, the Scoping Report does not detail the methodology applied to undertaking these surveys. The ES should clearly set out what surveys are being undertaken, the location, the duration, the weather conditions and the time of year.
6	12.4.5	Mitigation	The Inspectorate would expect to see mitigation such as acoustic bunds assessed fully within the ES and appropriate cross reference to other aspects in the ES such as the Landscape and Visual Impact Assessment.
7	12.9.1	Working hours	The Scoping Report explains that the working hours and noise levels will be agreed by the contractor and secured through the CEMP. The assessment in the ES should explain the working hours applied to the assessment and how these are secured through the DCO.
8	N/A	Methodology	The noise assessment is required and should include assessment of impacts to sensitive ecological receptors as well as human. NE should be consulted to agree which ecological receptors should be assessed in this regard.
9	12.9.4	CEMP	The Scoping Report states that mitigation measures will be secured through the CEMP. This should also be detailed in the

			ES and secured through the DCO.
10	12.12.1 5 and 12.12.1 6	Methodology	The Scoping Report does not set out the methodology for operational vibration assessment. The ES should clearly set out such a methodology.
11	12.12.1 7	Methodology	The ES should be explicit where the overarching methodology (Chapter 5 of the Scoping Report) is relied upon and when a aspect specific methodology is to be utilised.
12	Table 12.1	Potential noise and vibration effects	The ES should explain and justify the levels noted for LOAEL and SOAEL in Table 12.1.
13	12.12.1 9	Methodology	The Scoping Report states that human health will be addressed under section 12.11.1 however this paragraph in the Scoping Report does not address the assessment of impacts on human health. The ES should provide accurate cross referencing within and between the chapters to ensure a comprehensive assessment.

4.8 People and Communities

(Scoping Report section 13)

The Scoping Report notes that DMRB does not set out guidance on determining a study area. The study area comprises the Proposed Development and 250m around the Proposed Development.

The Scoping Report sets out a number of potential impacts in section 13.7. During construction these include but are not limited to disruption through overnight working, increased journey times, restrictions and closures of Public Rights of Way (PROW), demolition of buildings, land take, disruption to Hazlegrove Preparatory School and loss of Best Most Versatile (BMV) land. Positive potential impacts include benefits to the local economy from increased workforce.

The Scoping Report sets out the methodology for each of the matters addressed in this aspect chapter, including; non-motorised users, amenity, severance, motorised travellers view from road, driver stress, demolition of private property and associated land take, community land and community facilities and development land, local economy and agricultural land. The methodology draws upon the overarching methodology set out in Chapter 5 of the Scoping Report and includes tables that provide a further description of how significance of effect will be determined for each matter assessed.

The Scoping Report also lists a number of potential impacts from the operational phase which include but are not limited to opening up of views, increased journey times for non-motorised users, improved access to community facilities and improved access to Hazlegrove Preparatory School.

ID	Para	Applicant's proposed matters to scope out	Inspectorate's comments
1	Table 13.12	Development Land during construction	The Inspectorate notes that there is no land identified as an allocated development site in the South Somerset Local Plan (2006-2028). However the Inspectorate notes the potential for development to come forward which is not on allocated land which should be included in a cumulative impact assessment. As such, the Inspectorate does not agree that this matter can be scoped out.
2	Table 13.12	Development land during operation	The Inspectorate notes that there is no land identified as an allocated development site in the South Somerset Local Plan (2006-2028). However the Inspectorate notes the potential for development to come forward

			which is not on allocated land which should be included in a cumulative impact assessment. As such, the Inspectorate does not agree that this matter can be scoped out.
3	Table 13.12	MT's views from the road during construction	The Inspectorate notes that views from the road will not commence until the road is operational and therefore the Inspectorate is content to scope this out of the construction assessment.
4	Table 13.12	Demolition of private property and associated land take during construction	The Scoping Report sets out that demolition of private property and associated land take will take place during construction and therefore will not be assessed for operation. The Inspectorate is content, on this basis, to scope this matter out.
	Para	Other points	Inspectorate's comments
5	13.2.1	Study Area	The Scoping Report states that the study area has been defined through use of professional judgement. The Inspectorate considers this should be extended to take into account impacts on settlements such as Queen Camel.
6	13.3.22	Identification of receptors	The Applicant should ensure they have identified all community land and community facilities which may experience impacts from the Proposed Development. West Camel Parish Council in their response, highlight community facilities which have not been recorded in the Scoping Report. Such facilities should be included in the assessment to ensure a robust assessment.
7	13.8.2	Mitigation and enhancement	The Inspectorate notes the potential for adverse traffic impacts arising from the Proposed Development, the nature of which cannot be specifically identified at this stage. However, mitigation should be explained in the ES and secured in the DCO once any local impacts are identified.
8	13.11.1 9 - 13.11.2 2	Methodology	The Scoping Report refers to various receptors which are to be identified 'in the area' or 'in the immediate area' of the Proposed Development. This introduces ambiguity to the assessment as there is no defined, set study area. The ES should clearly set out the parameters for the assessment and justify how these parameters ensure all potentially affected

			receptors are included in the assessment. Further descriptions of the study area are included in the Scoping Report chapter however these are varied and vague. The Inspectorate expects all study areas to be explained and justified in the ES to ensure a robust assessment with all potential receptors included in the study area.
9	N/A	Potential Impact	The Inspectorate recognises that this aspect includes a number of distinct matters requiring a selective methodology for each. It is therefore essential that the ES clearly explain the methodology for each assessment including the definition of significance. The use of summary tables will be important to improve coherence for the reader and to understand the overall significance of effects.
10	13.11.1 1 – 13.11.1 2	Methodology	Reference is made to an Agricultural Land Classification (ALC) survey. The Inspectorate notes the comments made by NE and their reference to Technical Information Note TIN049 - Agricultural Land Classification: protecting the best and most versatile agricultural land. The Applicant should seek to agree the approach to the assessment of ALC with NE and as relevant make appropriate use of available technical information.

4.9 Road Drainage and the Water Environment

(Scoping Report section 14)

The study area for the assessment of surface water features, human health receptors, water resources and flood zones encompasses a 1km area around the Proposed Development. For the assessment of water features that may be affected by pollutants transported downstream, the study area, where appropriate, has been extended. Groundwater and the potential zone of influence will be assessed based on the Water Framework directive (WFD).

The methodology utilises guidance from the NPSNN, the National Planning Policy Framework (NPPF), The Planning Inspectorate Advice note 8: The Water Framework Directive and the DMRB volume 11, Section 3, Part 10. A preliminary WFD assessment will be carried out as well as a Flood Risk Assessment (FRA) that will form part of the Drainage Strategy document that will be included as an appendix within the ES.

Potential impacts during construction and operation include the potential mobilisation of sediment and contaminants into the watercourse, increases risk of pollution from chemical spills/ leaks, potential contamination of LWS, pollutants from vehicles contaminating surface water runoff and adversely impacting the surrounding environment and the impermeable road has the potential to increase flooding.

The Inspectorate has provided comments below on matters that the Applicant has proposed to scope out of the EIA.

ID	Para	Applicant's proposed matters to scope out	Inspectorate's comments
1	14.13.1 / Table 14.3	Road Drainage and the Water Environment	The Inspectorate does not agree that this matter can be scoped out of the ES due to the potential for significant effects to impact LWS due to their close proximity to the Proposed Development.
2	14.3.15 – 14.3.16	Impacts on Sparkford Wood, Babcary Meadows, East Polden Grassland and Wet Moor SSSIs	The Proposed Development is located within the SSSI Impact Risk Zone (IRZ) for several SSSIs. The Inspectorate is concerned that significant environmental effects have the potential to damage these nationally important sites and therefore, the Inspectorate does not agree that this matter can be scoped out. A full assessment of how the Proposed Development may affect the water environment of these sites should be included within ES.
3	14.3.23	Impact on Camel Hill	The Applicant states that the 'works would

		Quarry and Sparkford Refuse Tip	not affect the Camel Hill Quarry' and that the Sparkford Refuse Tip is not 'hydraulically linked' to the Proposed Development and therefore these sites will not be assessed. The Inspectorate considers that there is absence of an impact pathway for significant effects and they are unlikely to occur. Accordingly this matter can be scoped out of the ES. However, the justification to the scope of the assessment for this matter should be further supported by the inclusion of relevant plans/figures in the ES.
	Para	Other points	Inspectorate's comments
4	14.2.1	Study Area	The Scoping Report does not provide sufficient justification as to why a 1km study area has been used. The study area in the ES should be based on the extent of the likely impact and include a robust justification in support of the chosen study area.
5	14.2.1	Study Area	The Scoping Report does not define how or when the study area will be 'extended'. The ES should clearly explain the approach to extending the study area and justify the basis on which, this decision is reached.
6	14.3.1	Baseline	The Applicants attention is drawn to comments received from West Camel Parish Council regarding the discharge of surface water from the existing A303 to the east of Plowage Lane causing a 'significant source of surface water flood for the village'. An assessment of the possible mitigation measures to prevent this flooding should be included within the ES.
7	14.8.1	Design, Mitigation and Enhancement	The Scoping Report lacks sufficient detail of the proposed mitigation measures that are to be including within the CEMP and the Sustainable Drainage Systems (SuDS). Within the ES, the mitigation measures should be set out in as much detail as possible. Furthermore, the CEMP and SuDS should be included within the ES to ensure that the proposed mitigation measures will be implemented into the Proposed Development.
8	14.12.1	Assessment of impacts on fish	The Scoping Report states that there is a risk of impact on water chemistry and sediment within the adjacent water bodies

			which will indirectly adversely impact fish populations. The Applicant should monitor water quality and acquire fishery data to ensure that the fish populations are not impacted by the change in water quality caused by the Proposed Development.
9	N/A	Private water supplies	The ES should assess the impacts on private water supplies within 500m of the Proposed Development during construction and operation.

4.10 Climate

(Scoping Report section 15)

The proposed study area for the assessment of climate will consist of the design elements of the Proposed Development such as structures, technology, mitigation, compensation areas and the environmental receptors identified throughout the Scoping Report as the study area.

The proposed methodology will be undertaken in two parts with both parts being qualitative assessments. Part one will assess the effect the Proposed Development will have on climate and will utilise guidance from; IEMA's guidance from Assessing the GHG Emission and Evaluating their significance, TAG Unit A3 Environmental Impact appraisal – chapter 4 Greenhouse Gases and the PAS 2080:2016 Carbon Management in infrastructure. Part two will assess the vulnerability of the Proposed Development to climate change and will utilise guidance from the Climate Adaption Risk Assessment Progress Update and the IEMA Environmental Impact Assessment Guide to Climate Change and Resilience.

The potential impacts on the climate from the Proposed Development include the embodied emissions from the use of construction materials, the emission of greenhouse gases arising from the plant and transportation of materials and the increase in local vehicular emissions during the operation of the Proposed Development.

The potential impacts on the Proposed Development from climate include the construction site being vulnerable to extreme weather which could delay construction, potential adverse effects to the asphalt surface, foundations and structures, an increase in surface run off leading to increased contamination and adversely affect environmental receptors.

ID	Para	Applicant's proposed matters to scope out	Inspectorate's comments
1			No matters are proposed to be scoped out from the assessment on climate.
	Para	Other points	Inspectorate's comments
2	15.2	Study Area	The Scoping Report lacks a concise and justified study area. The Applicant should utilise a study area that is based on the extent of the likely impacts and agreed with the relevant consultees.

4.11 Combined and Cumulative Effects

(Scoping Report section 16)

The Scoping Report states that the study area for combined effects ranges from 200m for air quality to 2km for biodiversity. The search area for identification of other developments for the cumulative assessment reflects a 2km Zone of Influence, this is regarded in the Scoping Report as being proportionate to the scope and scale of the Proposed Development.

The Scoping Report sets out the methodology which is in line with the tiered approach advocated in the Planning Inspectorate Advice Note 17. The methodology will concentrate on the significant effects and will aim to differentiate between permanent, temporary, direct, indirect and secondary effects, positive or negative.

The significance of cumulative effects upon each environmental resource would be based on the balance of scores and using professional judgement.

During construction and operation, there is potential for combined impacts to receptors including geology and soils, landscape/townscape, cultural features, communities, vehicle travellers, ecology and material resources.

During construction there is potential for cumulative impacts on all receptors, and during operation there is potential for cumulative impacts to receptors, which includes habitats, protected species, agricultural land, noise and air quality.

No matters are proposed to be scoped out.

ID	Para	Applicant's proposed matters to scope out	Inspectorate's comments
1			No matters are proposed to be scoped out from the assessment on combined and cumulative.
	Para	Other points	Inspectorate's comments
2	Table 16.1	Landscape	Table 16.1 identifies a 1km Zone of Visual Impact; however the Landscape Assessment will take into account receptors outside of this 1km limit. The assessment should be undertaken based on the extent of the likely impacts and their potential to act cumulatively with other impacts.

5. INFORMATION SOURCES

5.0.1 The Inspectorate's National Infrastructure Planning website includes links to a range of advice regarding the making of applications and environmental procedures, these include:

- Pre-application prospectus³
- Planning Inspectorate advice notes⁴:
 - Advice Note Three: EIA Notification and Consultation;
 - Advice Note Four: Section 52: Obtaining information about interests in land (Planning Act 2008);
 - Advice Note Five: Section 53: Rights of Entry (Planning Act 2008) ;
 - Advice Note Seven: Environmental Impact Assessment: Preliminary Environmental Information, Screening and Scoping;
 - Advice Note Nine: Using the 'Rochdale Envelope';
 - Advice Note Ten: Habitats Regulations Assessment relevant to nationally significant infrastructure projects (includes discussion of Evidence Plan process);
 - Advice Note Twelve: Transboundary Impacts
 - Advice Note Seventeen: Cumulative Effects Assessment; and
 - Advice Note Eighteen: The Water Framework Directive.

5.0.2 Applicants are also advised to review the list of information required to be submitted within an application for Development as set out in The Infrastructure Planning (Applications: Prescribed Forms and Procedures) Regulations 2009 (as amended).

³ The Planning Inspectorate's pre-application services for applicants. Available from: <https://infrastructure.planninginspectorate.gov.uk/application-process/pre-application-service-for-applicants/>

⁴ The Planning Inspectorate's series of advice notes in relation to the Planning Act 2008 process. Available from: <https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/>

APPENDIX 1: CONSULTATION BODIES FORMALLY CONSULTED

TABLE A1: PRESCRIBED CONSULTATION BODIES⁵

SCHEDULE 1 DESCRIPTION	ORGANISATION
The Health and Safety Executive	Health and Safety Executive
The National Health Service Commissioning Board	NHS England
The relevant Clinical Commissioning Group	Somerset Clinical Commissioning Group
Natural England	Natural England
The Historic Buildings and Monuments Commission for England	Historic England - South West
The relevant fire and rescue authority	Devon and Somerset Fire and Rescue Service
The relevant police and crime commissioner	Avon and Somerset Police and Crime Commission
The relevant parish council(s) or, where the application relates to land [in] Wales or Scotland, the relevant community council	Sparkford Parish Council
The relevant parish council(s) or, where the application relates to land [in] Wales or Scotland, the relevant community council	Yeovilton Parish Council
The relevant parish council(s) or, where the application relates to land [in] Wales or Scotland, the relevant community council	West Camel Parish Council
The relevant parish council(s) or, where the application relates to land [in] Wales or Scotland, the relevant community council	Queen Camel Parish Council
The Environment Agency	The Environment Agency - Wessex
The Civil Aviation Authority	Civil Aviation Authority
The Relevant Highways Authority	Somerset County Council

⁵ Schedule 1 of The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (as amended) (the 'APFP Regulations')

SCHEDULE 1 DESCRIPTION	ORGANISATION
The relevant strategic highways company	Highways England - South West
Public Health England, an executive agency of the Department of Health	Public Health England
Relevant statutory undertakers	See Table A2 below
The Crown Estate Commissioners	The Crown Estate
The Forestry Commission	Forestry Commission - South West
The Secretary of State for Defence	Ministry of Defence

TABLE A2: RELEVANT STATUTORY UNDERTAKERS⁶

STATUTORY UNDERTAKER	ORGANISATION
The relevant Clinical Commissioning Group	Somerset Clinical Commissioning Group
The National Health Service Commissioning Board	NHS England
The relevant NHS Foundation Trust	South West Ambulance Service NHS Foundation Trust
Railways	Network Rail Infrastructure Ltd
Railways	Highways England Historical Railways Estate
Civil Aviation Authority	Civil Aviation Authority
Licence Holder (Chapter 1 Of Part 1 Of Transport Act 2000)	NATS En-Route Safeguarding
Universal Service Provider	Royal Mail Group
Homes and Communities Agency	Homes and Communities Agency
The relevant Environment Agency	Environment Agency - Wessex
The relevant water and sewage undertaker	Wessex Water
The relevant public gas transporter	Cadent Gas Limited
The relevant public gas transporter	Energetics Gas Limited
The relevant public gas transporter	Energy Assets Pipelines Limited

⁶ 'Statutory Undertaker' is defined in the APFP Regulations as having the same meaning as in Section 127 of the Planning Act 2008 (as amended)

STATUTORY UNDERTAKER	ORGANISATION
The relevant public gas transporter	ES Pipelines Ltd
The relevant public gas transporter	ESP Connections Ltd
The relevant public gas transporter	ESP Networks Ltd
The relevant public gas transporter	ESP Pipelines Ltd
The relevant public gas transporter	Fulcrum Pipelines Limited
The relevant public gas transporter	GTC Pipelines Limited
The relevant public gas transporter	Independent Pipelines Limited
The relevant public gas transporter	Indigo Pipelines Limited
The relevant public gas transporter	Quadrant Pipelines Limited
The relevant public gas transporter	National Grid Gas Plc
The relevant public gas transporter	National Grid Gas Plc
The relevant public gas transporter	Scotland Gas Networks Plc
The relevant public gas transporter	Southern Gas Networks Plc
The relevant public gas transporter	Wales and West Utilities Ltd
The relevant electricity distributor with CPO Powers	Energetics Electricity Limited
The relevant electricity distributor with CPO Powers	Energy Assets Power Networks
The relevant electricity distributor with CPO Powers	ESP Electricity Limited
The relevant electricity distributor with CPO Powers	G2 Energy IDNO Limited
The relevant electricity distributor with CPO Powers	Harlaxton Energy Networks Limited
The relevant electricity distributor with CPO Powers	Independent Power Networks Limited
The relevant electricity distributor with CPO Powers	Leep Electricity Networks Limited
The relevant electricity distributor with CPO Powers	The Electricity Network Company Limited
The relevant electricity distributor with CPO Powers	UK Power Distribution Limited
The relevant electricity distributor with CPO Powers	Utility Assets Limited
The relevant electricity distributor with CPO Powers	Utility Distribution Networks Limited
The relevant electricity distributor with CPO Powers	Western Power Distribution (South West) Plc

STATUTORY UNDERTAKER	ORGANISATION
The relevant electricity transmitter with CPO Powers	National Grid Electricity Transmission Plc
The relevant electricity transmitter with CPO Powers	National Grid Electricity Transmission Plc

TABLE A3: SECTION 43 CONSULTEES (FOR THE PURPOSES OF SECTION 42(1)(B))⁷

LOCAL AUTHORITY⁸
Bath and North East Somerset Council
Devon County Council
Dorset County Council
East Devon District Council
Exmoor National Park Authority
Mendip District Council
North Dorset District Council
North Somerset Council
Sedgemoor District Council
Somerset County Council
South Somerset District Council
Taunton Deane Borough Council
West Dorset District council
Wiltshire Council

TABLE A4: NON-PRESCRIBED CONSULTATION BODIES

ORGANISATION

⁷ Sections 43 and 42(B) of the PA2008

⁸ As defined in Section 43(3) of the PA2008

APPENDIX 2: RESPONDENTS TO CONSULTATION AND COPIES OF REPLIES

Consultation bodies who replied by the statutory deadline:

Avon and Somerset Police
Cadent Gas Ltd
Camel Expressway Steering Group
Dorset County Council
Environment Agency
ESP Utilities Group
Forestry Commission
Health and Safety Executive
National Air Traffic Service
National Grid
Natural England
Public Health England
Queen Camel Parish Council
Somerset County Council
South Somerset District Council
South Somerset District Council – Area East Committee
Wales and West Utilities
West Camel Parish Council
West Dorset District Council

Dear Michael,

Thank you for the invitation for consultation on the A303 Sparkford to Ilchester Dualling Report. As this is primarily an environmental impact assessment scoping report, it is not something which we, as a Police Force, would necessarily comment on. Many thanks.

Rich McK

Richard McKiernan
Traffic Management Unit
Avon& Somerset Constabulary

Breslaw, Michael

From: Stirling, Vicky <Vicky.Stirling@cadentgas.com>
Sent: 30 November 2017 09:12
To: A303 Sparkford to Ilchester
Subject: RE: EXT || TR010036 - A303 Sparkford to Ilchester - EIA Scoping Notification and Consultation / Reg 11 Notification

Dear Sir/Madam

Thank you for consulting with Cadent Gas Limited on proposals for the A303 Sparkford to Ilchester DCO. I can confirm that Cadent has no assets or interests within the area and therefore has no further comments to make.

Kind Regards
Vicky

Vicky Stirling
Senior Land Officer

Cadent
Ashbrook Court, Central Boulevard, Prologis Park, Coventry CV7 8PE
+44 (0)77 47671508

Twitter@PINSgov

This communication does not constitute legal advice.

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Please ensure you have adequate virus protection before you open or detach any documents from this transmission. Cadent Gas Limited does not accept any liability for viruses. An e-mail reply to this address may be subject to monitoring for operational reasons or lawful business practices.

Cadent Gas Limited is a limited liability company, registered in England and Wales (registered no. 10080864) with its registered office at Ashbrook Court, Prologis Park, Central Boulevard, Coventry CV7 8PE.

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Ms Karen Wilkinson
The Planning Inspectorate
Major Casework Directorate
Temple Quay House
Temple Quay
Bristol
BS1 6PN

Our ref: WX/2017/131202/01-L01
Your ref: TR010036-000004
Date: 21 December 2017

Dear Ms Wilkinson

EIA SCOPING OPINION NOV '17 - APPLICATION BY HIGHWAYS ENGLAND FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR DUALLING OF A303 SPARKFORD TO ILCHESTER

Thank you for your consultation regarding the above.

The Agency is essentially satisfied in respect of the report's content, pertinent to its interests. The Scoping Report is largely considered to be comprehensive in nature and presented in clear, concise and well organised format.

Notwithstanding the above, the following observations should be noted:

Biodiversity

10.2.1

A distance of 2 km may not be appropriate for water dependant SSSIs downstream of the proposed works. The River Cary feeds into designated sites and therefore, the potential would exist for a negative impact on such sites. Accordingly, these must be scoped in until it can be determined there would be little/no impact.

10.3.2

As stated above, water dependant designated sites downstream of water bodies, which may be impacted by the proposed works, must be scoped in until it can be determined there is little/no impact.

The Agency must advise that Wet Moor, which is at risk of deterioration due to eutrophication, should be scoped in at this stage. A programme of work is currently being progressed to reduce phosphate input to the system. The potential impacts of petrochemical runoff into the adjacent waterbody must be considered for both WFD and designated site risks.

10.3.8

Notable species known to be in the vicinity of the proposed works include European otters, which should be scoped into the survey package at this stage.

10.4.1

Where phase 1 surveys are not possible, a precautionary approach must be taken i.e. assume presence.

10.6.2

As a standard, the expectation for tree/hedgerow loss is like for like (or improved) replacement at a 3:1 ratio. For freshwater habitat loss the expectation is like for like (or improved) replacement at a 2:1 ratio.

14.12.1

There does not appear to be any information on the potential risk or impacts on fish populations within the adjacent water bodies. There is a risk of impact on water chemistry and sediments as a result of the proposed works, which would have a direct impact on fishery populations.

The River Yeo is a known salmonid waterbody and therefore an assessment should be undertaken to ensure compliance with the Salmon and Freshwater Fishery Act (1975) and the Water Framework Directive. It may be necessary to undertake monitoring of the fish population to determine the sensitivity of the species present to changes in sediment and water chemistry.

As a minimum, available fisheries data should be collated and gap analysis undertaken to determine whether additional monitoring is required.

For information, the Agency would prefer the WFD scoping report to be included at this stage. There appears to be sufficient evidence to inform the scoping report, which would then inform the need for a full WFD assessment. This assessment would be informed by additional information pertaining to ground/surface water linkages to WFD water bodies and anticipated sediment and water chemistry impacts.

Road Drainage and the Water Environment

The Agency would welcome the opportunity to review the forthcoming Flood Risk Assessment (FRA) at the earliest opportunity.

For information, the FRA should include a link to the Government's current climate change allowance guidance (see hereunder):

<https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>

The IDB and LLFA should be consulted in respect of specific aspects of road drainage attenuation and pollution control.

The Agency is unable to concur with the proposal to scope out any aspects of 'Road Drainage and the Water Environment' from the Environmental Statement.

Private water supplies (including deregulated supplies) may exist in proximity to the area of the proposed works. Accordingly, risks to these features from both construction and operational phases should be assessed utilising information from a water features survey. It is recommended the survey area should extend at least 500m on either side of the centre line of the proposed scheme. Baseline monitoring may be required prior to development.

Climate

Again, reference should be made to the Government's current climate change allowance guidance, as detailed above.

Should you wish to discuss the above issues please contact the undersigned direct.

Yours sincerely

Dave Pring
Planning Specialist

Direct dial 02030 250153

Direct fax 01278 452985

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

From: Planning

Sent: 30 November 2017 09:14

To: HighwayConsult <highwayconsult@dorsetcc.gov.uk>; Natural Environment Team
<net@dorsetcc.gov.uk>; Steve Wallis <s.p.wallis@dorsetcc.gov.uk>; FloodRiskManagement
<floodriskmanagement@dorsetcc.gov.uk>

Subject: FW: TR010036 - A303 Sparkford to Ilchester - EIA Scoping Notification and Consultation / Reg 11 Notification

Hello,

We have received the attached scoping consultation request from the Planning Inspectorate, on behalf of Highways England. Please refer to the letter for information and link to relevant documents.

Please send responses to A303Sparkfordtollchester@pins.gsi.gov.uk - I would be grateful if Planning could be copied into your response (planning@dorsetcc.gov.uk).

The response is due by 28 December 2017.

Many thanks,

Andrea

-

-

From: FloodRiskManagement
Sent: 08 December 2017 09:44
To: Planning <planning@dorsetcc.gov.uk>
Cc: 'djmartin@somerset.gov.uk' <djmartin@somerset.gov.uk>
Subject: RE: TR010036 - A303 Sparkford to Ilchester - EIA Scoping Notification and Consultation / Reg 11 Notification

Dear Andrea,

Thank you for the consultation, however, the length of highway does not appear to pass through the county boundary, as such we have no comment to make, but would refer the planning inspectorate to our colleagues at Somerset County Council for any Lead Local Flood Authority (LLFA) related comment.

Many Thanks,

**Chris Osborne,
Flood Risk Engineer.**

**Dorset Highways
Dorset County Council
County Hall, Colliton Park
Dorchester
DORSET
DT1 1XJ**

**Tel: 01305 221835 | C.J.Osborne@dorsetcc.gov.uk
[Report property flooding online](#)**

Live traffic and travel: dorsetforyou.com/traveldorset - [@TravelDorset](https://twitter.com/TravelDorset) on Twitter
[Report a road problem and make enquiries online](#)



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Dorset Newsroom: <http://www.dorsetforyou.com/news>
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Facebook: <http://www.facebook.com/dorsetforyou>



From: [Annabel King](#)
To: [A303 Sparkford to Ilchester](#)
Cc: [Planning](#)
Subject: TR010036 - A303 Sparkford to Ilchester - EIA Scoping Notification and Consultation / Reg 11 Notification
Date: 13 December 2017 16:32:31

Hi

Many thanks for the above consultation on the EIA scoping notification for the A303 Sparkford to Ilchester NSIP.

Having reviewed the Scoping Report the Dorset County Council Natural Environment Team have the following comments:

- The scoping report considers all ecological receptors which we would consider to be relevant and associated with the scheme
- We are pleased to see that lack of information on bat use within the zone of impact has been identified as a factor. We are aware that bat populations in North Dorset are often under recorded and it is likely that this is the case along this section of the A303. Surveys to identify which species may be impacted, and the impact of the scheme on bat foraging corridors will be needed to evaluate the full impact of the scheme on these species.
- The scoping report should also make reference to the need for an assessment of the residual loss of priority habitat or habitat supporting priority species, to help decide whether this should be addressed via the creation of compensatory areas or provision of financial compensation.

With all best wishes

Annabel

Dr Annabel King, MCIEEM

Senior Ecologist
Natural Environment Team
Dorset County Council
County Hall
Colliton Park
Dorchester
DT1 1XJ
01305 224 931 / 07779 428 378

I work part-time and am in on Monday, Tuesday, Thursday and Friday from 9am - 3pm. The easiest way to get hold of me is by e-mail.

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From: [ESP Utilities Group Ltd](#)
To: [A303 Sparkford to Ilchester](#)
Subject: Your Reference: TR010036 - 000004. Our Reference: PE133644. Plant Not Affected Notice from ES Pipelines
Date: 11 December 2017 10:42:46

A303 Sparkford to Ilchester
The Planning Inspectorate

11 December 2017

Reference: TR010036 - 000004

Dear Sir/Madam,

Thank you for your recent plant enquiry at (TR010036 - 000004).

I can confirm that ESP Gas Group Ltd has no gas or electricity apparatus in the vicinity of this site address and will not be affected by your proposed works.

ESP are continually laying new gas and electricity networks and this notification is valid for 90 days from the date of this letter. If your proposed works start after this period of time, please re-submit your enquiry.

Important Notice

Please be advised that any enquiries for ESP Connections Ltd, formerly known as British Gas Connections Ltd, should be sent directly to us at the address shown above or alternatively you can email us at: PlantResponses@espipelines.com

Yours faithfully,

Alan Slee
Operations Manager



Bluebird House
Mole Business Park
Leatherhead
KT22 7BA

☎ 01372 587500 📠 01372 377996

<http://www.espug.com>

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South West Forest Services

Bullers Hill
Kennford
Exeter
EX6 7XR

Tel 0300 067 5549

Date: 20 December 2017
Your ref: TR010036-000005

southwestfce@forestry.gsi.gov.uk

Area Director

Mark Prior

Karen Wilkinson
EIA and Land Rights Advisor
3D Eagle Wing
Temple Quay House
2 The Square
Bristol, BS1 6PN

Dear Ms Wilkinson

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017(the EIA Regulations) – Regulations 10 and 11

Application by Highways England for an Order granting Development Consent for the A303 Sparkford to Ilchester

Scoping consultation and notification of the Applicant's contact details and duty to make available information to the Applicant if requested

Thank you for your letter relating to the above scheme which was received by the Forestry Commission via email on 1 December 2017.

The Forestry Commission's summary points are:

- Ancient Woodlands and Veteran Trees* are acknowledged as an irreplaceable habitat and a part of our natural heritage. Mixed broadleaved woodland, wood-pasture and parkland are also regarded as principally important for the purpose of conserving biodiversity. Therefore, the chosen option should ideally avoid the loss of these important habitats.
- A scheme that fragments any woodland, particularly an Ancient Woodland, will not only result in significant loss, but will also decrease the ecological and environmental value and its resilience to climate change.

(*Note: Ancient Woodlands includes Ancient Semi-Natural Woodland (ASNW) and Plantations (including conifers) on Ancient Woodland Sites (PAWS).

The Forestry Commission is the Government Department that works with others to protect, improve and expand our nation's forests and woodland, increasing their value to society and the environment. As recognised in the Government's Policy Statement on forestry and woodlands (2013):

"New and better managed woodland also has a role in making our rural and urban landscapes more resilient to the effects of climate change. Our objectives for sustainable woodland creation and management will improve woodlands' resilience to climate change and other threats and enhance its contribution to wider climate change adaptation. Carbon will be sequestered through the growth of new woodlands. The wood products that are harvested from England's woodlands will help to reduce

greenhouse emissions from the energy sector directly as woodfuel and from other sectors where timber replaces more energy intensive materials. In addition, our focus on protection will help to ensure that we can safeguard the large store of carbon in England's woodlands."

The Forestry Commission is the Government's expert on forestry & woodland and a statutory consultee (as defined by Schedule 1 of The Infrastructure Planning (Applications: Prescribed Forms And Procedures) Regulations 2009) for major infrastructure (Nationally Significant Infrastructure Projects (NSIPS)) that are likely to affect the protection or expansion of forests and woodlands (Planning Act 2008).

The Forestry Commission's response is based on information submitted by Highways England on its consultation report published on its website.

We note that the selected option has been chosen as the one which will cause least damage to ancient woodland habitats and that this is in line with Natural England advice. We note that the selected option will still have some impact on nearby woodlands.

This response highlights matters which should be resolved as part of the pre-application process. We believe that these issues should be addressed by Highways England and the Examining Authority as part of the Environmental Statement.

- Ancient Woodlands and veteran trees must be included in all future habitat and species surveys in relation to this scheme and the size and nature of the impact quantified.
- All woodland is a priority habitat and so we would request that all woodland should be included in surveys and the impact on all woodland habitats should be quantified. We would encourage this to take into account likely impacts related to tree health issues, especially ash dieback, since this will affect future woodland and tree cover in the area.
- We would also encourage an assessment of hedgerows and in-field trees affected by the scheme.
- All European Protected Species should be included in surveys and impacts on populations assessed, as well as the impacts on designated sites in the vicinity.
- Impacts on watercourses should be assessed to consider whether this will affect ancient woodland flora downstream
- We draw attention to the fact that where significant harm to biodiversity cannot be avoided or mitigated, as a last resort, appropriate compensation measures should be sought.
- We would welcome mitigation works that result in an increase in woodland, hedgerow and field tree cover in this area, without impacting on other valuable habitats, especially where this improves natural flood management or water quality. We would also support mitigation work that reduces the impact of some non-native species, such as rhododendron, or tree health issues, such as the likely significant impact of ash dieback.
- We would encourage you to ensure that productive forestry is also considered and that access to any woodlands affected is maintained or improved to ensure that they can be managed efficiently and sustainably after the development takes place.

For the loss of any woodland, the Forestry Commission would ask:

1. To explore with you how this loss could be further reduced.
2. How best to target the creation of new woodland to compensate for the loss of trees and woodlands.

We look forward to hearing from you at the next consultation stage for these proposals. Please send all documents to southwestfce@forestry.gsi.gov.uk. For specific enquiries, you can email me at kate.tobin@forestry.gsi.gov.uk or ring me directly on 0300 067 5870, or write to us at the above address.

Yours sincerely,

Kate Tobin
Local Partnership Adviser

CEMHD Policy - Land Use Planning
NSIP Consultations
Building 2.2, Redgrave Court
Merton Road, Bootle
Merseyside, L20 7HS

Your ref: TR010036
Our ref: 4.2.1.6209
HSE email: NSIP.applications@hse.gov.uk

FAO Michael Breslaw
The Planning Inspectorate
Bristol
BS1 6PN
By e-mail

15/12/17

Dear Mr Breslaw

**PROPOSED A303 SPARKFORD TO ILCHESTER (the project)
PROPOSAL BY HIGHWAYS ENGLAND (the applicant)
INFRASTRUCTURE PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017 (as amended) – Regulations 10 and 11**

Thank you for your letter of 28th November 2017 regarding the information to be provided in an environmental statement relating to the above project. HSE does not comment on EIA Scoping Reports but the following information is likely to be useful to the applicant.

HSE's land use planning advice

Will the proposed development fall within any of HSE's consultation distances?

With reference to the *Proposed Draft Red Line Boundary and Scheme Elements* in drawings contained in document *A303 Sparkford to Ilchester Dualling, Environmental Impact Assessment Scoping Report, HE551507-MMSJV-EGN-000-RP-LP-0014, November 2017, Version: P13, Highways England*:

There are currently no Major Hazard Installations in the vicinity of the proposed scheme.

There are currently no Major Accident Hazard Pipeline(s) (MAHP) in the vicinity of the proposed scheme.

Although there are currently no Major Hazard Installations or Major Accident Hazard Pipeline(s) (MAHP) in the vicinity of the proposed scheme, should a Hazardous Substances Consent [The Planning (hazardous Substances) (England) 2015 Regulations (as amended)] be granted prior to the determination of the present application, and/or HSE receives a notification under the Pipeline Safety Regulations 1996 then HSE reserves the right to revise its advice.

Hazardous Substance Consent

The presence of hazardous substances on, over or under land at or above set threshold quantities (Controlled Quantities) may require Hazardous Substances Consent (HSC) under the Planning (Hazardous Substances) Act 1990 as amended. The substances, alone or when aggregated with others, for which HSC is required, and the associated Controlled Quantities, are set out in The Planning (Hazardous Substances) Regulations 2015.

Hazardous Substances Consent would be required if the site is intending to store or use any of the Named Hazardous Substances or Categories of Substances and Preparations at or above the controlled quantities set out in schedule 1 of these Regulations.

Explosives sites

HSE has no comment to make as there are no licensed explosive sites in the vicinity.

Waste

In respect of waste management the applicant should take account of and adhere to relevant health and safety requirements. Particular attention should be paid in respect of risks created from historical landfill sites. More details can be found on HSE's website at: <http://www.hse.gov.uk/waste/index.htm>

Electrical Safety

No comment from a planning perspective

Please send any further electronic communication on this project directly to the HSE's designated e-mail account for NSIP applications. Alternatively any hard copy correspondence should be sent to:

Mr Dave Adams (MHPD)
NSIP Consultations
2.2 Redgrave Court
Merton Road, Bootle,
Merseyside L20 7HS

Yours sincerely,



Dave Adams
(CEMHD4 Policy)



Historic England

SOUTH WEST OFFICE

Mr Michael Breslaw
The Planning Inspectorate
3D, Temple Quay House
Temple Quay
Bristol
BS1 6PN

Direct Dial: 0117 9750699

Our ref: PL00069502

14 December 2017

Dear Mr Breslaw

**RE: Planning Act 2008 (as amended) and The Infrastructure Planning
(Environmental Impact Assessment) Regulations 2017(the EIA Regulations) -
Regulations 10 and 11**

**Application by Highways England for an Order granting Development Consent
for the A303 Sparkford to Ilchester**

**Scoping consultation and notification of the Applicant's contact details and duty
to make available information to the Applicant if requested**

Thank you for consulting Historic England in respect of this request for a scoping opinion. We are broadly content with the proposed assessment methodology set out by the applicant in their EIA Scoping Report, but have the following comments to make in respect of designated heritage assets:

Chapter 7, Cultural Heritage:

7.2 Study Area - it is our view that the 1km boundary set for the proposed study area is not sufficient to assess potential setting impacts on significant designated heritage assets lying beyond this limit and which may be visually affected by the proposed development. Chapter 8, Landscape and Visual Impact, acknowledges this likely interplay on prominent heritage assets such as South Cadbury Castle and St Michaels Hill (both Scheduled Monuments), but will assess impacts from the perspective of the amenity value to receptors rather than impact on heritage significance. We recommend that Cultural Heritage assessment takes the same approach as Landscape and Visual Impact assessment in identifying designated heritage assets beyond 1km from the centreline of the scheme whose settings may be affected by the development and that it undertakes appropriate assessment of the likely setting impact upon those assets.

Hazelgrove House Registered Park and Garden - the scoping report notes the specific meeting held to consider how the scheme will impact upon this designated heritage asset. Detailed advice on assessment methodology was provided to the applicant, to



29 QUEEN SQUARE BRISTOL BS1 4ND

Telephone 0117 975 1308
HistoricEngland.org.uk



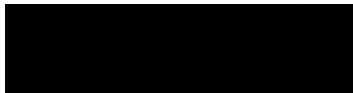


Historic England

SOUTH WEST OFFICE

draw out the history, development and thus significance of this designed landscape, in our formal response to non-statutory public consultation dated 29th March 2017. As the impact upon the RPaG is likely to be the most substantial heritage effect of the whole scheme, we are keen to see a robust assessment of the significance of this designated heritage asset so that informed advice can be provided to the applicant upon their emerging plans. It appears that there has been little investigation of this particular RPaG by earlier researchers, so it is imperative that this cultural heritage assessment provides a solid understanding upon which to base advice.

Yours sincerely,



Phil McMahon
Inspector of Ancient Monuments
phil.mcmahon@HistoricEngland.org.uk

cc: Kim Auston, Historic England Landscape Architect
Stephen Membury, SW Heritage Trust



29 QUEEN SQUARE BRISTOL BS1 4ND

Telephone 0117 975 1308
HistoricEngland.org.uk



Historic England is subject to the Freedom of Information Act. 2000 (FOIA) and Environmental Information Regulations 2004 (EIR). All information held by the organisation will be accessible in response to an information request, unless one of the exemptions in the FOIA or EIR applies.

From: [NATS Safeguarding](#)
To: [A303 Sparkford to Ilchester](#)
Subject: Your Ref: TR010036-000004 (Our Ref: SG25511)
Date: 01 December 2017 13:12:57
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)

The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.

However, please be aware that this response applies specifically to the above consultation and only reflects the position of NATS (that is responsible for the management of en route air traffic) based on the information supplied at the time of this application. This letter does not provide any indication of the position of any other party, whether they be an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted.

If any changes are proposed to the information supplied to NATS in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee NERL requires that it be further consulted on any such changes prior to any planning permission or any consent being granted.

Yours Faithfully

NATS

NATS Safeguarding

D: 01489 444687

E: natssafeguarding@nats.co.uk

4000 Parkway, Whiteley,
Fareham, Hants PO15 7FL

www.nats.co.uk



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From: [Jefferies, Spencer](#)
To: [A303 Sparkford to Ilchester](#)
Subject: A303 Sparkford to Ilchester consultation response.
Date: 21 December 2017 14:51:35
Attachments: [A303 Sparkford to Ilchester asset map.pdf](#)

Good afternoon,

Please accept this email as National Grid plc response to scoping consultation of A303 sparkford to Ilchester.

Please refer to asset map. National Grid have no assets in the order boundary and therefore would have no objection to the order should it be submitted at a later date.

Kind regards

Spencer Jefferies BSc

Development Liaison Officer
Acquisitions and Surveying
Network Management

National Grid House, Warwick Technology Park
Gallows Hill, Warwick. CV34 6DA
Mobile: 07812651481
Email: spencer.jefferies@nationalgrid.com
General enquiries: box.landandacquisitions@nationalgrid.com

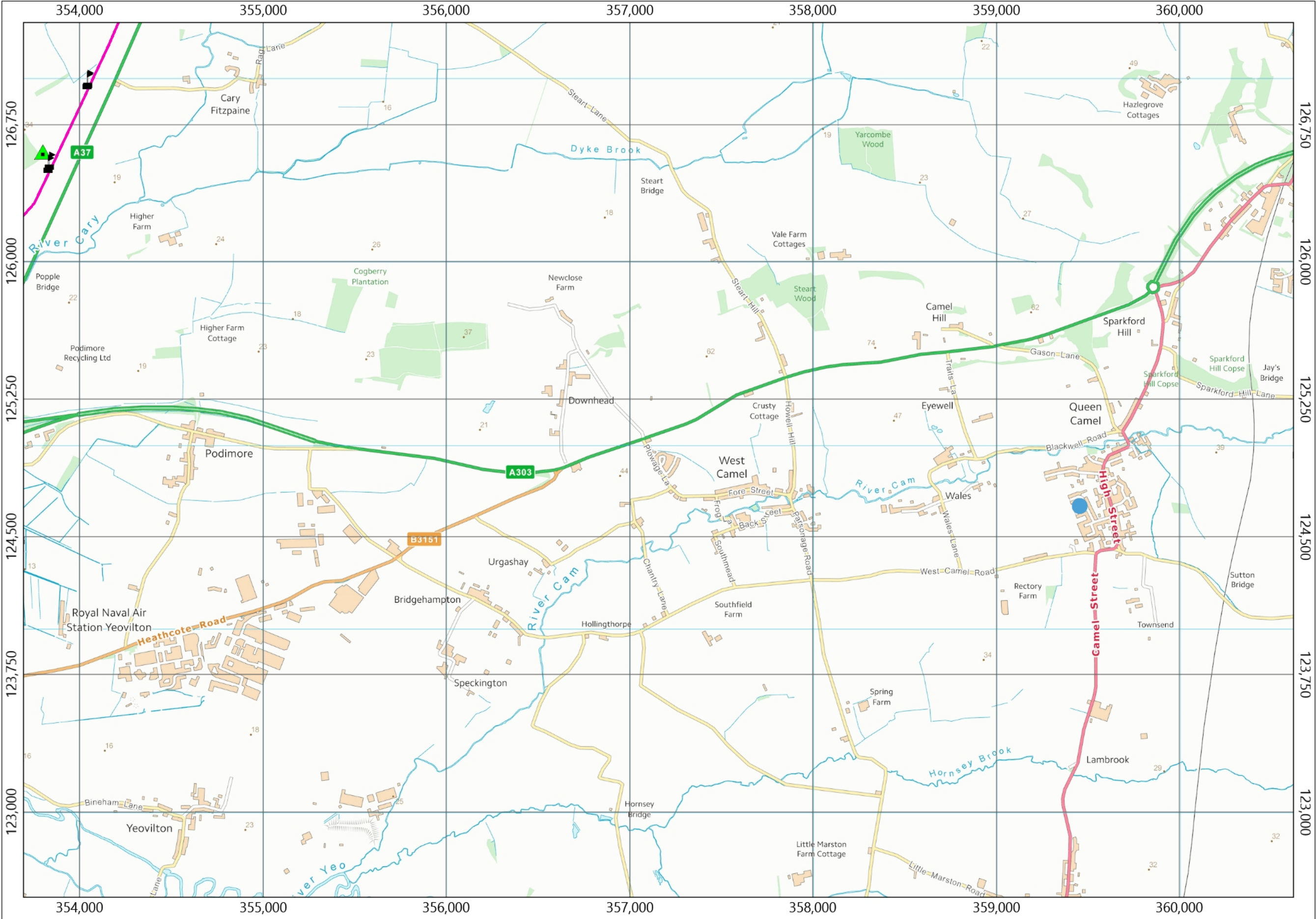
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- Legend:**
- Substations Commissioned
 - OHL 400kV Commissioned
 - OHL 275kV Commissioned
 - OHL 132kV & Below Commissioned
 - Towers Commissioned
 - Buried Cable Commissioned
 - Fibre Cable Commissioned
 - Pilot Cable
 - Oil Pipe
 - Cooling Pipe
 - Cooling Station
 - RAMM
 - Gas Operational Boundary
 - Gas Site Boundary
 - Block Valve
 - Compressor
 - LNG Site
 - Multijunction
 - Minimum Offtake
 - Future Minimum Offtake
 - Offtake
 - Pressure Reduction Installation
 - Pig Trap
 - Terminal
 - Transferred Offtake
 - Aerial Marker Post
 - CP Test Post
 - Transformer Rectifier
 - Gas Pipe Feeder
 - Commissioned
 - Decommissioned Group
 - Planned and Spares
 - SRP Sightings - Open
 - SRP Sightings - Closed
 - Eagles Enquiries - Open
 - Eagles Enquiries - Closed

Notes:



From: [Routh, Charles \(NE\)](#)
To: [A303 Sparkford to Ilchester](#)
Subject: RE: A303 Sparkford to Ilchester Dualing Scoping consultation (South Somerset) TR010036-000004 NE ref: 232913
Date: 21 December 2017 14:18:21

Dear Ms Wilkinson,

Thank you for consulting Natural England on the Environment Impact Assessment (EIA) Scoping Report for the A303 Sparkford to Ilchester Dualing scheme.

I can confirm that as far as Natural England's remit is concerned, the scoping document appears to appropriately set out the scope of the EIA, and we have no comments to make on it.

Charles Routh

Lead Advisor, Planning & Licencing, Somerset, Avon and Wiltshire Area Team, Natural England.
07990 773630

From: A303 Sparkford to Ilchester [<mailto:A303SparkfordtoIlchester@pins.gsi.gov.uk>]
Sent: 29 November 2017 11:00
To: NSIP.applications@hse.gov.uk; enquiries@somersetccg.nhs.uk; Consultations (NE) <consultations@naturalengland.org.uk>; pcc@avonandsomerset.pnn.police.uk; sparkford.clerk@gmail.com; clerk@yeoviltonparishcouncil.gov.uk; westcamclerk@btinternet.com; queencamel.clerk@gmail.com; airspace@caa.co.uk; planning@somerset.gov.uk; planningSW@highwaysengland.co.uk; NSIPconsultations@PHE.gov.uk; offshoreNSIP@thecrownestate.co.uk; westengland@forestry.gsi.gov.uk; DIO-Safeguarding-Statutory@mod.uk; TownPlanningSE@networkrail.co.uk; hreenquiries@highwaysengland.co.uk; natssafeguarding@nats.co.uk; mail@homesandcommunities.co.uk; customer.services@wessexwater.co.uk; vicky.stirling@cadentgas.com; alans@espipelines.com; FPLPlant@fulcrum.co.uk; box.landandacquisitions@nationalgrid.com; customer@sgn.co.uk; enquiries@wwutilities.co.uk; enquiries@g2energy.co.uk; assetrecords@utilityassets.co.uk; info@westernpower.co.uk
Subject: TR010036 - A303 Sparkford to Ilchester - EIA Scoping Notification and Consultation / Reg 11 Notification

Dear Sir/Madam

Please see attached correspondence on the proposed A303 Sparkford to Ilchester.

Please note the deadline for consultation responses is 28 December and is a statutory requirement that cannot be extended.

Kind regards,

Michael Breslaw

EIA and Land Rights Advisor
Major Applications and Plans

The Planning Inspectorate, 3D, Temple Quay House, Temple Quay, Bristol BS1 6PN
Direct line: 0303 444 5092

Helpline: 0303 444 5000

Email: Michael.Breslaw@pins.gsi.gov.uk

Web: <https://infrastructure.planninginspectorate.gov.uk/> (National Infrastructure Planning)

Web: www.gov.uk/government/organisations/planning-inspectorate (The Planning Inspectorate)

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Dorset Councils Partnership

www.dorsetforyou.com Text Relay calls welcome

By email

Oliver Rendle
Environmental Assessment Officer
Direct dial: 01305 251010 (ext: 2557)
Email: orendle@dorset.gov.uk

Date: 15th December 2017

Dear Sir/Madam,

THE INFRASTRUCTURE PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017 (THE EIA REGULATIONS)
RESPONSE TO THE SCOPING CONSULTATION FOR THE APPLICATION BY HIGHWAYS ENGLAND FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR THE A303 SPARKFORD TO ILCHESTER

Thanks for consulting the Dorset Councils Partnership, which comprises West Dorset District Council, Weymouth & Portland Borough Council and North Dorset District Council, on the Environmental Impact Assessment (EIA) scoping report for the proposed works on the A303 between Sparkford and Ilchester.

In response to the consultation, the Dorset Councils Partnership have the following comments to make on the information which should be provided in the environmental statement, which accompanies the application:

Chapter 13: People and Communities

The proposed economic assessment methodology seems to concentrate on very local economic effects and does not give full consideration to the economic effects further afield. Whilst the local effects are clearly important, there is the potential for effects over a wider scale from changes to a major route in the strategic highway network. The assessment should consider disruption to business traffic during the construction phase (for example, commuters, goods, passengers) and the potential benefits during the operational phase (for example from the reduced average transit times and fewer delays during periods of congestion) over a wider scale, particularly upon businesses in north/mid Dorset and the Yeovil area. The assessment might also consider employment land value uplift to the west of the improvements.

Chapter 14: Road Drainage and the Water Environment

The Flood Risk Assessment (FRA) should ensure that there is no significant impact for a number of different return periods with an allowance for climate change.

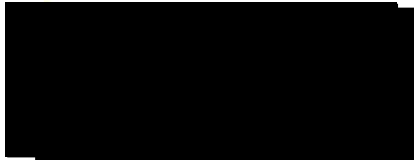
Dorset Councils Partnership

www.dorsetforyou.com Text Relay calls welcome

Dorset County Council's Flood Risk Management team is the Lead Local Flood Authority and should take lead on addressing flood risk, particularly with surface water management.

Please let me know if you have any questions about the information provided in this letter,

Yours sincerely,



Oliver Rendle



Public Health
England

CRCE/NSIP Consultations
Chilton
Didcot
Oxfordshire OX11 0RQ

nsipconsultations@phe.gov.uk
www.gov.uk/phe

Karen Wilkinson
EIA and Land Rights Advisor
The Planning Inspectorate
Temple Quay House
2 The Square
Bristol BS1 6PN

Your Ref : TR010036-000004

Our Ref : CIRIS 41764

21st December 2017

Dear Karen,

**Re: Scoping Consultation
Application for an Order Granting Development Consent for the proposed
A303 Sparkford to Ilchester**

Thank you for including Public Health England (PHE) in the scoping consultation phase of the above application. Our response focuses on health protection issues relating to chemicals and radiation. Advice offered by PHE is impartial and independent.

We understand that the promoter will wish to avoid unnecessary duplication and that many issues including air quality, emissions to water, waste, contaminated land etc. will be covered elsewhere in the Environmental Statement (ES). PHE however believes the summation of relevant issues into a specific section of the report provides a focus which ensures that public health is given adequate consideration. The section should summarise key information, risk assessments, proposed mitigation measures, conclusions and residual impacts, relating to human health. Compliance with the requirements of National Policy Statements and relevant guidance and standards should also be highlighted.

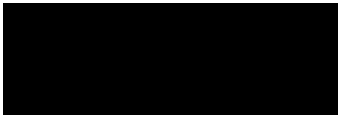
In terms of the level of detail to be included in an ES, we recognise that the differing nature of projects is such that their impacts will vary. Any assessments undertaken to inform the ES should be proportionate to the potential impacts of the proposal, therefore we accept that, in some circumstances particular assessments may not be relevant to an application, or that an assessment may be adequately completed using a qualitative rather than quantitative methodology. In cases where this decision is made the promoters should fully explain and justify their rationale in the submitted documentation.

It is noted that the current proposals do not appear to consider possible health impacts of Electric and Magnetic Fields (EMF). The proposer should confirm either

that the proposed development does include or impact upon any potential sources of EMF; or ensure that an adequate assessment of the possible impacts is undertaken and included in the ES.

The attached appendix outlines generic areas that should be addressed by all promoters when preparing ES for inclusion with an NSIP submission. We are happy to assist and discuss proposals further in the light of this advice.

Yours sincerely,



Allister Gittins
Environmental Public Health Scientist

nsipconsultations@phe.gov.uk

Please mark any correspondence for the attention of National Infrastructure Planning Administration.

Appendix: PHE recommendations regarding the scoping document

General approach

The EIA should give consideration to best practice guidance such as the Government's Good Practice Guide for EIA¹. It is important that the EIA identifies and assesses the potential public health impacts of the activities at, and emissions from, the installation. Assessment should consider the development, operational, and decommissioning phases.

It is not PHE's role to undertake these assessments on behalf of promoters as this would conflict with PHE's role as an impartial and independent body.

Consideration of alternatives (including alternative sites, choice of process, and the phasing of construction) is widely regarded as good practice. Ideally, EIA should start at the stage of site and process selection, so that the environmental merits of practicable alternatives can be properly considered. Where this is undertaken, the main alternatives considered should be outlined in the ES².

The following text covers a range of issues that PHE would expect to be addressed by the promoter. However this list is not exhaustive and the onus is on the promoter to ensure that the relevant public health issues are identified and addressed. PHE's advice and recommendations carry no statutory weight and constitute non-binding guidance.

Receptors

The ES should clearly identify the development's location and the location and distance from the development of off-site human receptors that may be affected by emissions from, or activities at, the development. Off-site human receptors may include people living in residential premises; people working in commercial, and industrial premises and people using transport infrastructure (such as roads and railways), recreational areas, and publicly-accessible land. Consideration should also be given to environmental receptors such as the surrounding land, watercourses, surface and groundwater, and drinking water supplies such as wells, boreholes and water abstraction points.

Impacts arising from construction and decommissioning

Any assessment of impacts arising from emissions due to construction and decommissioning should consider potential impacts on all receptors and describe monitoring and mitigation during these phases. Construction and decommissioning will be associated with vehicle movements and cumulative impacts should be accounted for.

We would expect the promoter to follow best practice guidance during all phases from construction to decommissioning to ensure appropriate measures are in place

¹ Environmental Impact Assessment: A guide to good practice and procedures - A consultation paper; 2006; Department for Communities and Local Government. Available from: <http://webarchive.nationalarchives.gov.uk/20100410180038/http://communities.gov.uk/planningandbuilding/planning/sustainability/environmental/environmentalimpactassessment/>

² DCLG guidance, 1999 <http://www.communities.gov.uk/documents/planningandbuilding/pdf/155958.pdf>

to mitigate any potential impact on health from emissions (point source, fugitive and traffic-related). An effective Construction Environmental Management Plan (CEMP) (and Decommissioning Environmental Management Plan (DEMP)) will help provide reassurance that activities are well managed. The promoter should ensure that there are robust mechanisms in place to respond to any complaints of traffic-related pollution, during construction, operation, and decommissioning of the facility.

Emissions to air and water

Significant impacts are unlikely to arise from installations which employ Best Available Techniques (BAT) and which meet regulatory requirements concerning emission limits and design parameters. However, PHE has a number of comments regarding emissions in order that the EIA provides a comprehensive assessment of potential impacts.

When considering a baseline (of existing environmental quality) and in the assessment and future monitoring of impacts these:

- should include appropriate screening assessments and detailed dispersion modelling where this is screened as necessary
- should encompass all pollutants which may be emitted by the installation in combination with all pollutants arising from associated development and transport, ideally these should be considered in a single holistic assessment
- should consider the construction, operational, and decommissioning phases
- should consider the typical operational emissions and emissions from start-up, shut-down, abnormal operation and accidents when assessing potential impacts and include an assessment of worst-case impacts
- should fully account for fugitive emissions
- should include appropriate estimates of background levels
- should identify cumulative and incremental impacts (i.e. assess cumulative impacts from multiple sources), including those arising from associated development, other existing and proposed development in the local area, and new vehicle movements associated with the proposed development; associated transport emissions should include consideration of non-road impacts (i.e. rail, sea, and air)
- should include consideration of local authority, Environment Agency, Defra national network, and any other local site-specific sources of monitoring data
- should compare predicted environmental concentrations to the applicable standard or guideline value for the affected medium (such as UK Air Quality Standards and Objectives and Environmental Assessment Levels)
 - If no standard or guideline value exists, the predicted exposure to humans should be estimated and compared to an appropriate health-based value (a Tolerable Daily Intake or equivalent). Further guidance is provided in Annex 1
 - This should consider all applicable routes of exposure e.g. include consideration of aspects such as the deposition of chemicals emitted to air and their uptake via ingestion
- should identify and consider impacts on residential areas and sensitive receptors (such as schools, nursing homes and healthcare facilities) in the area(s) which may be affected by emissions, this should include consideration of any new receptors arising from future development

Whilst screening of impacts using qualitative methodologies is common practice (e.g. for impacts arising from fugitive emissions such as dust), where it is possible to undertake a quantitative assessment of impacts then this should be undertaken. PHE's view is that the EIA should appraise and describe the measures that will be used to control both point source and fugitive emissions and demonstrate that standards, guideline values or health-based values will not be exceeded due to emissions from the installation, as described above. This should include consideration of any emitted pollutants for which there are no set emission limits. When assessing the potential impact of a proposed installation on environmental quality, predicted environmental concentrations should be compared to the permitted concentrations in the affected media; this should include both standards for short and long-term exposure.

Additional points specific to emissions to air

When considering a baseline (of existing air quality) and in the assessment and future monitoring of impacts these:

- should include consideration of impacts on existing areas of poor air quality e.g. existing or proposed local authority Air Quality Management Areas (AQMAs)
- should include modelling using appropriate meteorological data (i.e. come from the nearest suitable meteorological station and include a range of years and worst case conditions)
- should include modelling taking into account local topography

Additional points specific to emissions to water

When considering a baseline (of existing water quality) and in the assessment and future monitoring of impacts these:

- should include assessment of potential impacts on human health and not focus solely on ecological impacts
- should identify and consider all routes by which emissions may lead to population exposure (e.g. surface watercourses; recreational waters; sewers; geological routes etc.)
- should assess the potential off-site effects of emissions to groundwater (e.g. on aquifers used for drinking water) and surface water (used for drinking water abstraction) in terms of the potential for population exposure
- should include consideration of potential impacts on recreational users (e.g. from fishing, canoeing etc) alongside assessment of potential exposure via drinking water

Land quality

We would expect the promoter to provide details of any hazardous contamination present on site (including ground gas) as part of the site condition report.

Emissions to and from the ground should be considered in terms of the previous history of the site and the potential of the site, once operational, to give rise to issues. Public health impacts associated with ground contamination and/or the migration of material off-site should be assessed³ and the potential impact on nearby receptors and control and mitigation measures should be outlined.

³ Following the approach outlined in the section above dealing with emissions to air and water i.e. comparing predicted environmental concentrations to the applicable standard or guideline value for the affected medium (such as Soil Guideline Values)

Relevant areas outlined in the Government's Good Practice Guide for EIA include:

- effects associated with ground contamination that may already exist
- effects associated with the potential for polluting substances that are used (during construction / operation) to cause new ground contamination issues on a site, for example introducing / changing the source of contamination
- impacts associated with re-use of soils and waste soils, for example, re-use of site-sourced materials on-site or offsite, disposal of site-sourced materials offsite, importation of materials to the site, etc.

Waste

The EIA should demonstrate compliance with the waste hierarchy (e.g. with respect to re-use, recycling or recovery and disposal).

For wastes arising from the installation the EIA should consider:

- the implications and wider environmental and public health impacts of different waste disposal options
- disposal route(s) and transport method(s) and how potential impacts on public health will be mitigated

Other aspects

Within the EIA PHE would expect to see information about how the promoter would respond to accidents with potential off-site emissions e.g. flooding or fires, spills, leaks or releases off-site. Assessment of accidents should: identify all potential hazards in relation to construction, operation and decommissioning; include an assessment of the risks posed; and identify risk management measures and contingency actions that will be employed in the event of an accident in order to mitigate off-site effects.

The EIA should include consideration of the COMAH Regulations (Control of Major Accident Hazards) and the Major Accident Off-Site Emergency Plan (Management of Waste from Extractive Industries) (England and Wales) Regulations 2009: both in terms of their applicability to the installation itself, and the installation's potential to impact on, or be impacted by, any nearby installations themselves subject to the these Regulations.

There is evidence that, in some cases, perception of risk may have a greater impact on health than the hazard itself. A 2009 report⁴, jointly published by Liverpool John Moores University and the HPA, examined health risk perception and environmental problems using a number of case studies. As a point to consider, the report suggested: "Estimation of community anxiety and stress should be included as part of every risk or impact assessment of proposed plans that involve a potential environmental hazard. This is true even when the physical health risks may be negligible." PHE supports the inclusion of this information within EIAs as good practice.

⁴ Available from: <http://www.cph.org.uk/wp-content/uploads/2012/08/health-risk-perception-and-environmental-problems--summary-report.pdf>

Electromagnetic fields (EMF)

This statement is intended to support planning proposals involving electrical installations such as substations and connecting underground cables or overhead lines. PHE advice on the health effects of power frequency electric and magnetic fields is available in the following link:

<https://www.gov.uk/government/collections/electromagnetic-fields#low-frequency-electric-and-magnetic-fields>

There is a potential health impact associated with the electric and magnetic fields around substations, and power lines and cables. The field strength tends to reduce with distance from such equipment.

The following information provides a framework for considering the health impact associated with the electric and magnetic fields produced by the proposed development, including the direct and indirect effects of the electric and magnetic fields as indicated above.

Policy Measures for the Electricity Industry

The Department of Energy and Climate Change has published a voluntary code of practice which sets out key principles for complying with the ICNIRP guidelines:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/37447/1256-code-practice-emf-public-exp-guidelines.pdf

Companion codes of practice dealing with optimum phasing of high voltage power lines and aspects of the guidelines that relate to indirect effects are also available:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/48309/1255-code-practice-optimum-phasing-power-lines.pdf

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/224766/powerlines_vcop_microshocks.pdf

Exposure Guidelines

PHE recommends the adoption in the UK of the EMF exposure guidelines published by the International Commission on Non-ionizing Radiation Protection (ICNIRP). Formal advice to this effect was published by one of PHE's predecessor organisations (NRPB) in 2004 based on an accompanying comprehensive review of the scientific evidence:-

<http://webarchive.nationalarchives.gov.uk/20140629102627/http://www.hpa.org.uk/Publications/Radiation/NPRBArchive/DocumentsOfTheNRPB/Abds1502/>

Updates to the ICNIRP guidelines for static fields have been issued in 2009 and for low frequency fields in 2010. However, Government policy is that the ICNIRP

guidelines are implemented in line with the terms of the 1999 EU Council Recommendation on limiting exposure of the general public (1999/519/EC):

http://webarchive.nationalarchives.gov.uk/+/www.dh.gov.uk/en/Publichealth/Healthprotection/DH_4089500

Static magnetic fields

For static magnetic fields, the ICNIRP guidelines published in 2009 recommend that acute exposure of the general public should not exceed 400 mT (millitesla), for any part of the body, although the previously recommended value of 40 mT is the value used in the Council Recommendation. However, because of potential indirect adverse effects, ICNIRP recognises that practical policies need to be implemented to prevent inadvertent harmful exposure of people with implanted electronic medical devices and implants containing ferromagnetic materials, and injuries due to flying ferromagnetic objects, and these considerations can lead to much lower restrictions, such as 0.5 mT.

Power frequency electric and magnetic fields

At 50 Hz, the known direct effects include those of induced currents in the body on the central nervous system (CNS) and indirect effects include the risk of painful spark discharge on contact with metal objects exposed to the field. The ICNIRP guidelines published in 1998 give reference levels for public exposure to 50 Hz electric and magnetic fields, and these are respectively 5 kV m⁻¹ (kilovolts per metre) and 100 µT (microtesla). The reference level for magnetic fields changes to 200 µT in the revised (ICNIRP 2010) guidelines because of new basic restrictions based on induced electric fields inside the body, rather than induced current density. If people are not exposed to field strengths above these levels, direct effects on the CNS should be avoided and indirect effects such as the risk of painful spark discharge will be small. The reference levels are not in themselves limits but provide guidance for assessing compliance with the basic restrictions and reducing the risk of indirect effects.

Long term effects

There is concern about the possible effects of long-term exposure to electromagnetic fields, including possible carcinogenic effects at levels much lower than those given in the ICNIRP guidelines. In the NRPB advice issued in 2004, it was concluded that the studies that suggest health effects, including those concerning childhood leukaemia, could not be used to derive quantitative guidance on restricting exposure. However, the results of these studies represented uncertainty in the underlying evidence base, and taken together with people's concerns, provided a basis for providing an additional recommendation for Government to consider the need for further precautionary measures, particularly with respect to the exposure of children to power frequency magnetic fields.

The Stakeholder Advisory Group on ELF EMFs (SAGE)

SAGE was set up to explore the implications for a precautionary approach to extremely low frequency electric and magnetic fields (ELF EMFs), and to make practical recommendations to Government:

<http://www.emfs.info/policy/sage/>

SAGE issued its First Interim Assessment in 2007, making several recommendations concerning high voltage power lines. Government supported the implantation of low cost options such as optimal phasing to reduce exposure; however it did not support not support the option of creating corridors around power lines on health grounds, which was considered to be a disproportionate measure given the evidence base on the potential long term health risks arising from exposure. The Government response to SAGE's First Interim Assessment is available here:

http://webarchive.nationalarchives.gov.uk/20130107105354/http://www.dh.gov.uk/en/Publicationsandstatistics/Publications/PublicationsPolicyAndGuidance/DH_107124

The Government also supported calls for providing more information on power frequency electric and magnetic fields, which is available on the PHE web pages (see first link above).

Ionising radiation

Particular considerations apply when an application involves the possibility of exposure to ionising radiation. In such cases it is important that the basic principles of radiation protection recommended by the International Commission on Radiological Protection⁵ (ICRP) are followed. PHE provides advice on the application of these recommendations in the UK. The ICRP recommendations are implemented in the Euratom Basic Safety Standards⁶ (BSS) and these form the basis for UK legislation, including the Ionising Radiation Regulations 1999, the Radioactive Substances Act 1993, and the Environmental Permitting Regulations 2016.

PHE expects promoters to carry out the necessary radiological impact assessments to demonstrate compliance with UK legislation and the principles of radiation protection. This should be set out clearly in a separate section or report and should not require any further analysis by PHE. In particular, the important principles of justification, optimisation and radiation dose limitation should be addressed. In addition compliance with the Euratom BSS and UK legislation should be clear.

When considering the radiological impact of routine discharges of radionuclides to the environment PHE would expect to see a full radiation dose assessment considering both individual and collective (population) doses for the public and, where necessary, workers. For individual doses, consideration should be given to those members of the public who are likely to receive the highest exposures (referred to as the representative person, which is equivalent to the previous term,

⁵ These recommendations are given in publications of the ICRP notably publications 90 and 103 see the website at <http://www.icrp.org/>

⁶ Council Directive 96/29/EURATOM laying down basic safety standards for the protection of the health of workers and the general public against the dangers arising from ionising radiation.

critical group). Different age groups should be considered as appropriate and should normally include adults, 1 year old and 10 year old children. In particular situations doses to the fetus should also be calculated⁷. The estimated doses to the representative person should be compared to the appropriate radiation dose criteria (dose constraints and dose limits), taking account of other releases of radionuclides from nearby locations as appropriate. Collective doses should also be considered for the UK, European and world populations where appropriate. The methods for assessing individual and collective radiation doses should follow the guidance given in 'Principles for the Assessment of Prospective Public Doses arising from Authorised Discharges of Radioactive Waste to the Environment August 2012'⁸. It is important that the methods used in any radiological dose assessment are clear and that key parameter values and assumptions are given (for example, the location of the representative persons, habit data and models used in the assessment).

Any radiological impact assessment should also consider the possibility of short-term planned releases and the potential for accidental releases of radionuclides to the environment. This can be done by referring to compliance with the Ionising Radiation Regulations and other relevant legislation and guidance.

The radiological impact of any solid waste storage and disposal should also be addressed in the assessment to ensure that this complies with UK practice and legislation; information should be provided on the category of waste involved (e.g. very low level waste, VLLW). It is also important that the radiological impact associated with the decommissioning of the site is addressed. Of relevance here is PHE advice on radiological criteria and assessments for land-based solid waste disposal facilities⁹. PHE advises that assessments of radiological impact during the operational phase should be performed in the same way as for any site authorised to discharge radioactive waste. PHE also advises that assessments of radiological impact during the post operational phase of the facility should consider long timescales (possibly in excess of 10,000 years) that are appropriate to the long-lived nature of the radionuclides in the waste, some of which may have half-lives of millions of years. The radiological assessment should consider exposure of members of hypothetical representative groups for a number of scenarios including the expected migration of radionuclides from the facility, and inadvertent intrusion into the facility once institutional control has ceased. For scenarios where the probability of occurrence can be estimated, both doses and health risks should be presented, where the health risk is the product of the probability that the scenario occurs, the dose if the scenario occurs and the health risk corresponding to unit dose. For inadvertent intrusion, the dose if the intrusion occurs should be presented. It is recommended that the post-closure phase be considered as a series of timescales, with the approach changing from more quantitative to more qualitative as

⁷ HPA (2008) Guidance on the application of dose coefficients for the embryo, fetus and breastfed infant in dose assessments for members of the public. Doc HPA, RCE-5, 1-78, available at <https://www.gov.uk/government/publications/embryo-fetus-and-breastfed-infant-application-of-dose-coefficients>

⁸ The Environment Agency (EA), Scottish Environment Protection Agency (SEPA), Northern Ireland Environment Agency, Health Protection Agency and the Food Standards Agency (FSA). Principles for the Assessment of Prospective Public Doses arising from Authorised Discharges of Radioactive Waste to the Environment August 2012. https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/296390/geho1202bklh-e-e.pdf

⁹ HPA RCE-8, Radiological Protection Objectives for the Land-based Disposal of Solid Radioactive Wastes, February 2009

times further in the future are considered. The level of detail and sophistication in the modelling should also reflect the level of hazard presented by the waste. The uncertainty due to the long timescales means that the concept of collective dose has very limited use, although estimates of collective dose from the 'expected' migration scenario can be used to compare the relatively early impacts from some disposal options if required.

Annex 1

Human health risk assessment (chemical pollutants)

The points below are cross-cutting and should be considered when undertaking a human health risk assessment:

- The promoter should consider including Chemical Abstract Service (CAS) numbers alongside chemical names, where referenced in the ES
- Where available, the most recent United Kingdom standards for the appropriate media (e.g. air, water, and/or soil) and health-based guideline values should be used when quantifying the risk to human health from chemical pollutants. Where UK standards or guideline values are not available, those recommended by the European Union or World Health Organisation can be used
- When assessing the human health risk of a chemical emitted from a facility or operation, the background exposure to the chemical from other sources should be taken into account
- When quantitatively assessing the health risk of genotoxic and carcinogenic chemical pollutants PHE does not favour the use of mathematical models to extrapolate from high dose levels used in animal carcinogenicity studies to well below the observed region of a dose-response relationship. When only animal data are available, we recommend that the 'Margin of Exposure' (MOE) approach¹⁰ is used

¹⁰ Benford D et al. 2010. Application of the margin of exposure approach to substances in food that are genotoxic and carcinogenic. Food Chem Toxicol 48 Suppl 1: S2-24

By email and post



Queen Camel Parish Council

Chairman – Mr John Brendon

Karen Wilkinson,
The Planning Inspectorate
3D Eagle Wing - Temple Quay House
2 The Square
Bristol BS1 6PN

Your Ref : TR010036-000004 (FAO Karen Wilkinson)

22nd December, 2017

Dear Ms. Wilkinson,

Information to be included in the Highways England (HE) Environmental Statement (ES)

In response to your letter of 29th November we would be grateful if you would take account of the information below in drawing up your Scoping Opinion; all references are to HE's *Environmental Impact Assessment Scoping Report* of November 2017 [version P13]. Although the sections in this response follow the order of the *Scoping Report* please bear in mind that this Council's greatest concerns relate to part 3 of Section 13, the scheme's **impact on the local road network** (see below).

Section 2 The Scheme: The Scheme is predicated on a longer term plan for the A303 which anticipates "*that future enhancements would make this section 'expressway' compatible*" (2.3.3, p.6). We would be grateful if you would advise the applicant that the environmental impact of the current proposals cannot be properly assessed without more information on the nature and scale of these possible "*future enhancements*". We hope that the ES will include a summary of any further engineering works required to turn the road into an 'expressway', a list of the licensed and unlicensed classes of vehicles and drivers which would be excluded from the 'expressway', an indication of what provision would be made for the excluded vehicles, and a forecast of any consequential change in traffic volumes.

Section 6 Air Quality: The proposed road realignment at the Sparkford end of the Scheme as well as a probable increase in traffic on the upgraded A303 would likely increase the exposure to pollutants of young children and staff at Hazlegrove School, along with residents of properties at Camel Hill and Blue Haze. These properties would be closer to the realigned road and in the prevailing southwesterlies they are downwind from it. We would therefore be grateful if you would advise the applicant to reconsider his decision not to implement any air quality mitigation measures (6.8.2, p.30) and we hope that such measures will be included in the ES.

Section 8 Landscape and Visual Effects: we hope that the ES will detail measures to mitigate the visual impact of the raised section of road on the western ridge of Camel Hill, as seen from the south.

Section 13 People and Communities

1. **Study area** (13.2, p.97): there may be technical reasons why the study area extends no further than 250m. from the scheme but this does seem unduly limited. It implies that the scheme will not greatly affect the majority of Queen Camel residents (who live <1200m. from the scheme) let alone the children and staff at Hazlegrove School (<600m.) In reality all will be much affected by the Scheme, especially during the construction phase.
2. **Severance** (13.3.8, p.101): the list of communities in the vicinity of the Scheme should include the hamlet of Wales and the Preparatory boarding School at Hazlegrove Park.
3. **The impact of the scheme on the local road network**: this is a matter of major concern to this Council and residents of Queen Camel, especially in relation to the construction phase.
 - In claiming it is “possible” that overnight work “could cause temporary disruption for MT’s along the A303, A359 and adjoining side roads...and cause disruption for local communities” (13.7.1, p.106) the applicant gravely understates the problem.
 - We appreciate assurances that “The People and Communities assessment will factor these traffic management requirements in” (13.7.1, p.106) and that “A Traffic Management Plan (TMP) would be implemented during the construction phase of the Scheme, to ensure that access is maintained and disruption is minimised as far as possible” (13.8.1, p.108). However more concrete detail is needed at an early stage.
 - **We therefore respectfully request that you advise the applicant to show a far greater appreciation of the magnitude of the traffic management problem and ask that detailed mitigation measures be set out in the ES rather than leaving them to be worked out with consultants and contractors at a later time.**

The applicant may find the following local information helpful in assessing the problem:

1. Local traffic on Queen Camel High Street (the A359) averages c.7,000 vehicles in the course of a 12-hour day, with almost 800 vehicles per hour at peak times, resulting in periodic congestion. Whenever there is congestion on the Sparkford-Ilchester section of the A303, for example at weekends and holiday times (especially in the summer) or after an RTA, the High Street is flooded with through traffic using Satnavs to find a way round via local roads. The knock-on effects include more severe congestion on Queen Camel High Street, heavy traffic along the West Camel Road (an unclassified road) and gridlock on Wales Road and Blackwell Road (a narrow unclassified road, partly single lane).
2. The A359 is heavily used by emergency service vehicles and as a result congestion in Queen Camel can have a serious effect on people and communities over a much wider area.
3. Vehicles avoiding the congested section of the A303 are often directed by Satnavs to the West Camel Road, passing close to the Medical Centre and the Primary school - both of which serve communities far beyond the village. Patients attending the Medical Centre use the road and local children have to cross it on their way to and from school, so congestion on the A303 inconveniences and can endanger two of the most vulnerable groups in Queen Camel and neighbouring communities.
4. We understand that throughout the construction period the applicant plans to keep open one lane of the A303 in each direction, as at present, but it will be necessary to reduce the speed limit from 50mph to 40mph in coned lanes. This is bound to increase the frequency and severity of congestion on the A303 with greater congestion of local roads an inevitable knock-on effect.

5. We understand that nighttime closures of the A303 will be required on occasion and this is likely to result in heavy traffic flows through the heart of Queen Camel all night.
6. There is a 7.5t. weight restriction on the High Street and other Queen Camel roads but it is widely flouted and seems unlikely to deter HGV drivers trying to avoid congestion on the A303.
7. There is a right-angled corner at the southern end of the High Street where long or wide commercial vehicles trying to squeeze past each other find it difficult to avoid mounting the narrow pavement at times, endangering pedestrians including children walking to and from school.
8. At times the density of traffic on the A359 leads to gridlock between the three pinch points on the High Street.
9. Roadside parking on the High Street and at Hill View (on the A359 to the north of the bridge) often restricts traffic to a single lane, especially when wide agricultural and commercial vehicles are involved, and this creates further congestion.

We would therefore request that the following mitigation measures be considered to supplement whatever official diversions are put in place:

- i. Signage on the A303 (east of Sparkford and west of Ilchester) advising drivers that using Queen Camel High Street and West Camel Road to bypass congestion on the A303 are likely to encounter longer delays.
- ii. Similar signage warning HGV drivers of the measures in place to enforce the 7.5t. weight limit on local roads (see iii below).
- iii. Setting up a system in conjunction with the County Highways Department and the Police to ensure compliance with and enforcement of the 7.5t. weight restriction on the A359 and West Camel Road. One possible model is the Hinkley Point traffic management scheme with its use of advanced number plate recognition technology.
- iv. In the longer term, investigating the merits of retaining the existing A303 carriageway as a possible A303 relief road and for local traffic.

We hope you find this information useful in helping you prepare your Scoping Opinion for Highways England's Environmental Statement.

Yours sincerely,

Patrick Pender-Cudlip

Clerk and Responsible Financial Officer to Queen Camel Parish Council
The Cobblers, High Street, Queen Camel, Yeovil BA22 7NE. Tel..01935 850692
queencamel.clerk@gmail.com

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Karen Wilkinson	Please ask for:	Mike O'Dowd-Jones
The Planning Inspectorate	Our Reference	
3D Eagle Wing	Your reference:	TR010036-000004
Temple Quay House	Direct Dial	01823 356238
2 The Square	E-Mail	modowdjones@somerset.gov.uk
Bristol	Date	22 December 2017
BS1 6PN		

Application by Highways England for an Order granting Development Consent for the A303 Sparkford to Ilchester: Response to scoping consultation.

FAO Karen Wilkinson

Thank you for your letter of 29 November 2017 consulting us before you adopt a scoping opinion in relation to Highways England's proposals for improving the A303 between Sparkford and Ilchester.

The Council has responded to Highways England's initial non-statutory consultation on their proposals and our response can be accessed at <http://www.somerset.gov.uk/EasySiteWeb/GatewayLink.aspx?allId=124347>.

The Council has engaged with Highways England as proposals have developed but anticipates a number of highway matters in relation to the preferred route will have to be resolved in detail with Highways England if adversarial representation to the Planning Inspectorate Examination is to be avoided following submission of the DCO application. Such matters are likely to include:

- Impact of the scheme on the local road network, including any TROs to regulate use of former A303 if necessary, and agreement in relation to construction access and construction vehicle routing.
- Design of local road elements of the scheme, including alterations of junctions and side roads as appropriate.
- Flood risk and surface water drainage.
- Rights of way and access, including segregated crossings.
- De-trunking and transfer of former Highways England assets to Somerset County Council as necessary.
- Requirements for local Traffic Regulation Orders.

It is imperative that adequate information is provided by Highways England in relation to these matters to enable the Council to prepare a statement of common ground and local impact report.

Of particular importance to Somerset County Council as Local Highway Authority; in relation to the Environmental Impact Assessment for the scheme; is that the impact of the proposed scheme and associated junction strategy on local traffic movement, congestion, safety and accessibility are fully quantified by Highways England, and understood by all parties, with any necessary mitigations agreed.

As noted in our response to the non-statutory consultation dated March 2017, The Council has requested a workshop with Highways England to understand in detail the proposed scope of the assessments to be undertaken in support of the application, and agree detailed methodologies. This has recently been verbally agreed and is likely to take place in January 2018. The Council would have preferred to have undertaken this workshop and jointly agreed the methodologies (particularly traffic modelling methodologies), before commenting on a formal EIA scoping report, since we may find that requirements emerge from the joint discussion that should be included in the EIA process. Nonetheless we note the statutory requirement to inform your scoping opinion by 28 December and have set out in principle below the key areas where we feel the scoping report as drafted requires further consideration:

5.5.5 – 5.5.12: Traffic Modelling: The EIA proposes to use the South West Regional Traffic Model (SWRTM). The Council has not had any engagement on the SWRTM and is unable to comment on its robustness as a tool upon which to base the EIA. The Council would like to understand how well the model validates with local traffic conditions before agreeing its use is appropriate. Highways England have used a different model up to this point and that model has not been used in conjunction with a variable demand model. The Council is concerned that the SWRTM may not be a sufficiently detailed model to understand local re-routing impacts such as those arising from reducing the number of access points to the A303, and would request that robust analysis is taken at a sufficient level of detail using a jointly agreed methodology to identify local adverse impacts arising from the proposal and develop suitable mitigation.

13.2.1. Severance: Scoping needs to acknowledge that severance impacts may occur outside of the localised study area should the scheme and associated changes to local network connectivity increase traffic flows on sections of the local network. These impacts will need to be identified and where appropriate mitigated.

13.7.12. Potential Impacts – Operation: It is not correct to state at this stage that “*The proposed Scheme is anticipated to remove the majority of through-flow traffic from the existing A303 onto the new road, which would be a high speed, free flowing dual carriageway for its length. This would provide significant relief from congestion upon the local road network and reduce driver stress*”. The preferred route comprises largely on-line improvements to the existing A303 resulting in reduced local network connectivity and may create new congestion pressures through re-routing local network traffic onto potentially longer and more convoluted routes than currently available. This may create adverse impacts for road users and communities on the local road network.

13.7.15. Potential Impacts – Operation: It is not correct to state at this stage that “*..the Scheme would result in relief from congestion on the local road network, which is likely to improve access to community facilities in the study area, in terms of journey time.*” For the same reasons as set out above the scheme might increase congestion and delay on parts

of the local network which might adversely impact on access to community facilities within and potentially outside the study area.

13.8.2. Design, mitigation and enhancement measures – operation. The DCO may also need to include mitigation for adverse traffic impacts arising from the scheme, the nature of which cannot be specifically identified at this stage but which may need to be designed once any local impacts are identified.

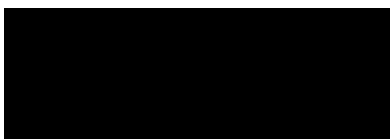
13.11.19. Private Property and Associated Land Take, Community Land and Community Facilities, Development Land, and Local Economy. It should be noted that there may be receptors outside the immediate area (due to impacts which may be created by re-routing local traffic). It is not possible at this stage to identify where these might be since there has been no assessment agreed by the Council which quantifies the extent of changes to traffic flow on the local road network associated with the scheme.

The South West Heritage Trust has requested that their response on cultural heritage matters be incorporated into the County Council response as follows:

A303 Scoping opinion: Cultural Heritage

The methodology set out in the Scoping Opinion Cultural Heritage section is comprehensive in terms of the assessment of non-designated assets. The commitment to intrusive (trial trench) evaluation following the desk based assessment and geophysical survey is welcomed to fully describe the significance of buried heritage assets with archaeological interest. The use of DMRB assessment is standard for these types of assessment and we agree that this is the correct assessment method. Historic England has responded to the Scoping Opinion with comments concerning the assessment of Designated assets and we endorse those comments.

Yours sincerely

A black rectangular box redacting the signature of Mike O'Dowd-Jones.

Mike O'Dowd-Jones

Strategic Commissioning Manager Highways and Transport

Cc Martin Woods, South Somerset District Council

From: [Jo Manley](#)
To: [A303 Sparkford to Ilchester](#)
Cc: [David Norris](#); [Jo Wilkins](#); [Simon Fox](#); [Robert Archer](#); [Dominic Heath-Coleman](#); [Andrew Tucker](#); [Vicki Dawson](#); [Terry Franklin](#); [Phil Poulton](#); [Pam Williams](#)
Subject: EIA Scoping Notification and Consultation / Reg 11 Notification - Response from South Somerset District Council
Date: 18 December 2017 10:07:26

FAO Karen Wilkinson

Thank you for consulting South Somerset District Council before adopting your Scoping Opinion on the Environmental Statement for the A303 Sparkford to Ilchester Development Consent Order.

The Council has considered the document and believe its scope and content to be acceptable. We would however like to raise the following points for you to consider when adopting your Scoping Opinion:

- Environmental Protection - it would be useful to include the rationale for the LOAEL and SOAEL in table 12.1 and confirm that these are pre-mitigation levels for assessing noise impact.
- Arboricultural Issues - the Scoping Report states that the Hazlegrove Park County Wildlife Site is within the scheme foot-print, however, it does not appear to mention the; “*important assemblage of veteran trees* (which we believe are a designated Priority Habitat) *with specialist invertebrate fauna*” (which might include the Violet Click-Beetle and/or Noble Chafer). Notwithstanding the likely presence of Potential Roosting Features for bats, if the foot-print of the proposal does require the removal of veteran trees, that would be a particular cause for concern and would seem deserving of specialist arboricultural input in order to minimise the impact. As an aside, many sections of the A 303 have benefitted from significant linear woodland plantings running parallel with the carriageway, these plantings have become well established and clearly provide multiple ecological and community benefits. It is likely that the project will require the removal of a large quantity of adjoining trees and hedgerows. Unfortunately, South Somerset has particularly low levels of tree-cover – only around 4% as opposed to a national county average of 12% - so the loss of adjoining trees and hedgerows could prove to be a blow that is quite dis-proportionate. We would particularly welcome an emphasis upon enhancing the scheme by actively seeking opportunities to create significant areas of new woodland plantings within and adjoining the areas of land to be purchased. The existing Forestry Commission and Countryside Stewardship schemes may provide useful resources of knowledge and perhaps even potential funding for this (e.g. The Woodland Creation Grant). We expect that future woodland plantings would be informed by appropriately experienced and qualified arboricultural input. The current threat of pests and diseases affecting trees is unprecedented. The robust provision of robust bio-diversity and the insistence upon healthy planting stock of UK-provenance should certainly be considered a high priority.

We have no further comments at this stage.

Kind regards,

Jo Manley BSc (Hons) MSc MRTPI

Policy Planner - 01935 462442
South Somerset District Council

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South Somerset District Council

The Council Offices, Churchfield, Wincanton, Somerset, BA9 9AG
Telephone: (01935) 462462
Website: www.southsomerset.gov.uk

Helen Rutter *Communities Lead*

Mr T Roberts
Project Manager
Highways England
Temple Quay House
2 The Square
Bristol
BS1 6HA

Date: 27 December 2017
Your Ref:
Our Ref: PW
Ask for: Pam Williams
Direct Line: 01963 435020
Email: pam.williams@southsomerset.gov.uk

Dear Mr Roberts,

A303 Sparkford – Ilchester preferred route

The above scheme was discussed at the November and December meetings of South Somerset District Council's Area East Committee, following the informative consultation sessions hosted by Highway England, at Haynes Motor museum earlier in the month.

Councillors representing communities either along, or close to, the Sparkford – Ilchester section of the A303 acknowledged that many people were relieved and encouraged when the preferred route was announced. There appeared to be stronger support for the preferred route and this is reflected in the feedback which we have received to-date. Inevitably, there are localised concerns about the actual route, detail designing, signage for the tourist attractions close to the route, the loss of a diversionary route for emergency/other closures and how the construction phase will be managed.

There is a particular need to establish a mechanism for ongoing and regular liaison, through design, inception and delivery with stakeholders such as Parish Councils to anticipate, minimise and manage adverse impacts. I believe that you are arranging to meet with one Parish Council and trust that similar arrangements will be put in place for other Parishes/stakeholders.

I will endeavour to summarise the other main points:

- In selecting option 1, it is generally accepted that it will be more difficult to manage traffic during construction. Will the measures to mitigate the disruption and traffic congestion be factored in through the detailed design phase?
- Junctions have prompted concerns, the loss of direct access for westbound vehicles to Yeovilton and an absence of support for the alternative (a potential new junction near Steart Lane/Howell Hill)
- Concerns that small settlements which are already 'rat runs' will see traffic surges as motorists seek alternative routes during construction

If you need this information in large print, Braille, audio or another language, please contact me at the above address



- Designing in service vehicle provision, in particular a connection for agriculture vehicles where a farm holding has been severed by the preferred route
- Noise levels are, and continue, to cause concern, with the need to moderate noise impacts for residents of the park home site at West Camel raised; due to the nature of construction these homes are not afforded the same level of noise protection as conventionally built residential properties.

Please would you ensure that Area East Committee is included on any circulations about future consultation for the scheme.

Yours sincerely



Cllr Nick Weeks
Chair – Area East Committee

Our Reference Number : 8150080211
Your Reference Number : TR010036-000004



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www.wwutilities.co.uk

FAO:

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National Infrastructure Directorate
2 Temple Quay House
Temple Quay
The Square
Bristol
BS1 6PN

Date : 05.12.2017
Network Contact : Danielle Thomas
Telephone : 02920 278912
Fax :

Dear The Planning Inspectorate

Re: No Gas

Wales & West Utilities acknowledge receipt of your notice received on **29.11.2017**, advising us of the proposals for:

A303, Sparkford, YEOVIL, Somerset, BA22 7LH

According to our mains records Wales & West Utilities has no apparatus in the area of your enquiry. However Gas pipes owned by other GT's and also privately owned may be present in this area. Information with regard to such pipes should be obtained from the owners.

Safe digging practices, in accordance with HS(G)47, must be used to verify and establish the actual position of mains, pipes, services and other apparatus on site before any mechanical plant is used. It is your responsibility to ensure that this information is provided to all persons (either direct labour or contractors) working for you on or near gas apparatus.

Please note that the plans are only valid for 28 days from the date of issue and updated plans must be requested before any work commences on site if this period has expired.

Yours sincerely

Nigel Winnan
Connections Manager
Wales & West Utilities

24 hour gas escape number
Rhif 24 awr os bydd nwy yn gollwng

0800 111 999*

*calls will be recorded and may be monitored
caiff galwadau eu recordio a gellir eu monitro



BSL240

Wales & West Utilities Limited

Registered Office:
Wales & West House, Spooner Close, Coedkernew, Newport NP10 8FZ
Registered in England and Wales: No. 5046791

WEST CAMEL PARISH COUNCIL

REQUEST FOR ADDITIONAL INFORMATION WITHIN THE PROPOSED ENVIRONMENTAL STATEMENT FROM HIGHWAYS ENGLAND

General Observation – the design and consultation process appear to be out of sync, with Highways England's (HE) consultant Mott-MacDonald 'lagging behind' the milestones set by HE, and much of the design detail just isn't available. In the HE Environmental Impact Assessment Scoping Report (EIASR) so much vital detail is listed as, 'yet to be decided', that stakeholders are restricted in making an 'informed' response.

The proposed location of junctions (if built) above the village of West Camel is perhaps the most outstanding omission, closely followed by gradient and eventual height of the proposed Expressway.

What we can only interpret as 'political pressure' to start construction in 2020, is in grave danger of delivering a design that will not be the best outcome for anyone, road users, local communities, other undertakers etc. and may well fail to satisfy checks and balances at the DCO stage.

'Garden Village' Proposals – We wish to draw the attached proposal issued by South West Strategic Developments to the Planning Inspectorate's attention. This proposal to build up to 15,000 homes in the area where the western end of Option 2 would have been sited. This proposal needs to be factored into the ES in terms of future transport movements, surface water discharge, air and noise pollution etc.

Although probably not applicable to this response, the Planning Inspectorate need to satisfy themselves that an early sight of these proposals by HE, didn't form a mitigating factor in the choice of, what was until recently the more expensive Option 1 as their preferred route?

This question may well be raised at the DCO stage as the inevitable increase in land acquisition costs for Option 2, following early sight of development proposals by HE, may well have invalidated that option, leaving stakeholders and members of the public no real choice?

Dual Carriageway or Expressway? – section 2.3.3 of the EIASR states that 'it is anticipated that future enhancements would make the section 'Expressway' compatible. An article in 'The Times' of Thursday 14th December (below) clearly states that parts of the A303 between the M3 and M5 will be upgraded to 'Expressway' standard in the periods 'up to 2020' and '2020-2025'. These improved A roads will be designated A(M) and 'slow moving vehicles and bicycles will be banned'.

Mini-motorways to ease congestion

Graeme Paton

A new generation of mini-motorways are to be created across England to combat congestion amid warnings that traffic will rise by more than a third in the next two decades.

The country's busiest A-roads will be converted into "expressways", with roundabouts and traffic lights stripped out and motorway-style features installed, such as slip lanes to keep cars flowing and overhead gantries to warn of congestion ahead. Slow-moving vehicles and bicycles will be banned.

Highways England is already committed to converting a number of A-roads into 70mph expressways during its present five-year funding period up to 2020. Some roads will be widened to up to three lanes on both sides.

The first expressway will be opened on the A14 between Huntingdon and Cambridge as part of £1.5 billion upgrade due to be completed in 2020.

Others proposed include parts



Britain's busiest A-roads will be converted into "expressways"
RUI VIEIRA/PA

of the A303 between the M3 and M5, the A3 between London and Portsmouth, the A12 in Essex, the A1 north of Peterborough and the A50 between Derby and Stoke.

The A-roads will be redesignated as A(M).

Highways England has unveiled a £30 billion plan for its next five-year period from 2020 to 2025. Its document said that the "major development will be the presence of the expressway network across the length and breadth of the country".

It said that the roads would "feel more like motorways".

Highways England has pre-

dicted that traffic on the 4,300-mile strategic road network — England's motorways and largest A-roads — will increase by 9 per cent between 2015 and 2020, followed by another 31 per cent rise up to 2041. Without investment the average speed on the network could fall from 59.4mph in 2015 to 55.1mph in 2041, it said.

The Campaign for Better Transport criticised the expressway plan as the building of more motorways "by stealth". Bridget Fox, its sustainable transport campaigner, said: "The plans to build big new expressways and convert A-roads to motorways are not the answer to the challenge of connecting our towns and cities."

"Evidence shows that new roads create new traffic."

Steve Gooding, director of the RAC Foundation, said: "This isn't about concreting over the countryside with new routes but enhancing what we have. The changes are driven by safety concerns and the need to improve capacity." ■

CONTENTS EDITIONS MY ARTICLES



From discussions with Mott-MacDonald, it is apparent that (probably to save cost and time) they **are tasked by HE to build a dual carriageway NOT an 'Expressway'**. If the Sparkford to Podimore section of the A303 is to become the A303(M) in the period 2020-2025, then logically the proposals should be to 'Expressway' standard NOW to avoid expensive and invasive reworking within 5 years of completion?

The ES (Environmental Statement) should in ALL respects reflect the likely conditions and design aspects of an 'Expressway' and the Planning Inspector should satisfy himself (and probably The National Audit Office) that these increased standards are transparent, well before the DCO stage of the process.

5.5.7 Base Model Assumptions – basing all assumptions on weekday traffic flows in March appears to be ludicrous on what is clearly acknowledged to be a seasonal holiday route and one of the main road arteries into the South West.

A Friday in August would be much more reflective of potential Environmental impact.

6. Air Quality – there appears to be an almost total lack of 'base-line' data in this area (6.3.12 Summary of the Baseline Conditions) supports this view. The ES should undertake to produce robust 'base-line' data prior to work commencing and take into account the impact of a northerly wind dispersing increased levels of pollutants over the community of West Camel and similarly the impact of a southerly wind on the outlying communities within the parish of West Camel at Downhead and Steart.

6.7.3 Human Health & Wellbeing – the EIASR recognises that there are 200 residential receptors (Human Beings??) within 200 metres of the realigned road BUT fails to recognise that around 50 'receptors' live together at Orchard Park. This is a mobile home park and the construction of these units makes their inhabitants (Receptors) much more vulnerable to noise pollution. Added to which the

demographic is slightly older than the parish average with the majority of residents in the 75+ age bracket, including 4 registered disabled.

Orchard Park should be singled out for some very sensitive treatment in terms of both design and during the construction phase.

Another group of houses that should be singled out for separate consideration are the four sets of semi-detached 'round houses'. Although re-roofed some years ago their overall construction is probably well short of modern standards especially in terms of sound insulation. These homes are directly downhill of the proposed 3 - 4 m high elevated section of the new road to the east of Conegore Corner and probably contain the highest density of children in the village of West Camel.

8 Landscape and Visual Effects – the EIASR is sadly silent on the visual impact of current proposals for the dual carriageway east of Conegore Corner being built up on a 3 – 4m high bank as it passes to the east of West Camel Village and the hamlet of Wales (Queen Camel parish). **This needs to be specifically mentioned in the ES and detail added as to how this eyesore is to be mitigated.**

12 Noise and Vibration – the EIASR clearly states at 12.6 that no consultation has taken place as to the potential impact of noise and vibration. Orchard Park needs to be singled out as a "special area" because the impact of noise and vibration will be felt most by these residents. **This has not been recognised so far in the Consultation process.**

13 People and Communities – The EIASR is in grave danger of taking a base-line of an already unacceptable traffic volume exacerbated by the use of sat-nav guidance that increases the north-west to south-east 'rat-run' of traffic through the village of West Camel, along Plowage Lane and Howell Hill. **The ES should acknowledge that the base-line is unacceptably high and HE need to work collaboratively with SCC Highways to reduce volumes of transient road users, whilst still maintaining connectivity with the outlying populations at Downhead and Steart. West Camel PC are currently working with SCC Highways to calm and reduce traffic and it is essential that the ES acknowledges and co-operates with these efforts to prevent public money being wasted through abortive actions / proposals.**

13.3.22 Community Land and Community Facilities – the Davis Hall (Village Hall) the 'heart' of West Camel parish and the WCPC Playing Field both fall within the 'Land Interest envelope declared by HE, yet are not mentioned in this section. Both areas will be impacted during and after the proposed scheme. **These areas / buildings need to be included in the ES document.**

13.3.17 Local Businesses – the EIASR currently does not recognise the potential impact on the Walnut Tree public house, restaurant and hotel in the village of West Camel. This business draws passing trade from the existing A303, which will potentially be lost and this loss may well endanger the viability of a village amenity. **The Walnut Tree public house, restaurant and hotel needs to be included in the ES and proposals developed to mitigate the potential loss of trade through signage etc.**

14. Road Drainage and Water Environment – the EIASR is currently silent on the discharge of surface water from the existing A303 (a section being retained and de-trunked) to the east of Plowage lane where surface water is collected and discharged into the field ditch network and into Cottis Lane. **This is a significant source of surface water flood for the village of West Camel and needs to be included within the ES and proposals developed to include diverting this outfall to be managed within the overall scheme drainage.**

16 Combined and Cumulative Effects – there is scope to both mitigate and potentially improve the Combined and Cumulative effects of this scheme of the residents of West Camel Parish BUT this can only be achieved through engagement and dialogue. **HE's current practice of ignoring parish councils in favour of land owners will only result in dissatisfaction, complaint and missed**

opportunities. There is a real opportunity to 'win the hearts and minds' of a community most affected by this project; there is potential for HE to change perceptions without incurring unacceptable costs.

Conclusion

West Camel Parish Council remained neutral during phase 1 of the HE consultation process, feeding back the 'pros and cons' of each option upon the Parish of West Camel and clearly stated that they would support the HE preferred route and work with HE to obtain the best outcome for our community.

This positive and constructive attitude only works if we are included in an iterative process and are treated as a major stakeholder as the body representing the whole community of West Camel Parish.

We did manage to arrange an initial meeting with Mott-MacDonald on 17th November but requests for further meetings have been politely declined and feedback from neighbouring parishes suggests that what we see in the spring of 2018 will be incomplete!

Should HE continue to ignore this most directly affected community and seek to upgrade this section of the A303 to a lower standard, exposing our community to further disruption within 5 years of completion, we would feel compelled to reflect this serious breach of public trust, formally to the Planning Inspectorate at the DCO stage.

Les Stevens
Clerk to West Camel Parish Council

Dorset Councils Partnership

www.dorsetforyou.com Text Relay calls welcome

By email

Oliver Rendle
Environmental Assessment Officer
Direct dial: 01305 251010 (ext: 2557)
Email: orendle@dorset.gov.uk

Date: 15th December 2017

Dear Sir/Madam,

THE INFRASTRUCTURE PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017 (THE EIA REGULATIONS)
RESPONSE TO THE SCOPING CONSULTATION FOR THE APPLICATION BY HIGHWAYS ENGLAND FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR THE A303 SPARKFORD TO ILCHESTER

Thanks for consulting the Dorset Councils Partnership, which comprises West Dorset District Council, Weymouth & Portland Borough Council and North Dorset District Council, on the Environmental Impact Assessment (EIA) scoping report for the proposed works on the A303 between Sparkford and Ilchester.

In response to the consultation, the Dorset Councils Partnership have the following comments to make on the information which should be provided in the environmental statement, which accompanies the application:

Chapter 13: People and Communities

The proposed economic assessment methodology seems to concentrate on very local economic effects and does not give full consideration to the economic effects further afield. Whilst the local effects are clearly important, there is the potential for effects over a wider scale from changes to a major route in the strategic highway network. The assessment should consider disruption to business traffic during the construction phase (for example, commuters, goods, passengers) and the potential benefits during the operational phase (for example from the reduced average transit times and fewer delays during periods of congestion) over a wider scale, particularly upon businesses in north/mid Dorset and the Yeovil area. The assessment might also consider employment land value uplift to the west of the improvements.

Chapter 14: Road Drainage and the Water Environment

The Flood Risk Assessment (FRA) should ensure that there is no significant impact for a number of different return periods with an allowance for climate change.

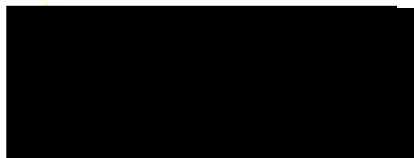
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Dorset County Council's Flood Risk Management team is the Lead Local Flood Authority and should take lead on addressing flood risk, particularly with surface water management.

Please let me know if you have any questions about the information provided in this letter,

Yours sincerely,



Oliver Rendle