



**A303 Sparkford to Ilchester Dualling
PINS Reference: TR010036**

**Joint Council Local Impact Report
23rd January 2019**

**Submitted by South Somerset District Council and
Somerset County Council**



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1. Introduction

- 1.1 This submission comprises the Local Impact Report for Somerset County Council (SCC) and South Somerset District Council (SSDC) – the “Joint Councils” to the Planning Inspectorate regarding Highways England’s (HE) application for a Development Consent Order (DCO) in relation to the dualling of the A303 between Sparkford and Ilchester.
- 1.2 Somerset County Council and South Somerset District Council (the Joint Councils) are “interested parties” under the Planning Act 2008 in relation to the project, are Local Planning Authorities and SCC is the Local Highway Authority in relation to the proposed works. Additionally, the Joint Councils have a number of other statutory responsibilities in relation to housing, public rights of way, flood management and environmental health, and discretionary powers in relation to well-being and enforcement.
- 1.3 The Joint Councils’ approach to this project is to seek delivery of the standards of assessment and mitigation of impact that are consistent with policy, following good practice and are consistent with their approach to any development project that is proposed within their respective areas. The Joint Councils are also mindful that post any consent, they may be responsible for Discharging Requirements and will also become the Enforcement authorities for the scheme in some cases.
- 1.4 The Joint Councils have engaged with Highways England throughout the project development and have fully responded to previous consultations with comments and concerns. Unfortunately, it was not possible to secure a Planning Performance Agreement to assist the process. Highways England has made positive efforts to address our comments in some areas, but a number of substantive issues still remain

2. Joint Council Local Impact Report: Executive Summary

2.1 This Executive Summary sets out the key issues of concern to South Somerset District Council and Somerset County Council.

2.2 Traffic and Transport

- Detailed design - The scheme submitted is still only at preliminary design stage, and whilst advanced, is not finalised. There are points of detail that SCC have raised concerns/ sought clarification upon. Such items can only be closed out/ suitably addressed once the scheme has progressed to the detailed design stage. It is noted that detailed designs are not yet programmed to be developed until appointment of a further contractor. SCC will require provision within the wording of the DCO for the Local Highway Authority to approve the remaining detailed design elements (where it relates to the Local Highway Network) and agreement for the fees associated with this.
- Impact on West Camel and Sparkford villages - The submitted traffic modelling shows an increase in traffic on Sparkford High Street and West Camel. SCC believes that traffic calming measures and other associated mitigation measures should be explored and considered through the DCO process and a mechanism established to secure this mitigation.
- Pressures on the local and strategic road network around Podimore Roundabout - The traffic modelling report includes assessments of the proposed junctions, but the assessment has shown potential issues at Podimore Roundabout in the summer peak scenario. This junction is included for improvement as part of the A303 corridor however there is currently no certainty about the nature and timing of this improvement. It is therefore suggested that an interim improvement to increase the capacity at the junction is developed.
- De-trunking - Further discussion is required in relation to de-trunking to agree the appropriate legal mechanism to include matters associated with process and maintenance due to the potential issue of creating future maintenance liabilities for the County Council.
- Details for the management of traffic during construction - Arrangements for managing traffic during construction need to be developed prior to commencement on site and a mechanism agreed to enable any unintended or unassessed impacts to be addressed. The traffic management plan has no consideration of off-road highway network so, along with the Construction Environment Management Plan should be amended to fully incorporate the management of off-road traffic.
- Maintenance - Where the site boundary incorporates the local highway network, confirmation of roles and responsibilities relating to winter maintenance, hedge cutting, visibility splay maintenance and gully cleansing will need to be submitted and approved by the County Council.

2.3 Public Rights of Way

Concerns remain in respect of mitigation currently proposed by the applicant for the impact of the stopping up of the connection of Y30/28 with the A303. SCC has an alternative mitigation proposal which is considered to be more convenient and shorter in length for affected users. SCC has also raised concerns about how consideration is given to unrecorded rights that may exist which the development could interfere with.

2.4 Drainage

There will be a need for the applicant to provide more detail as the proposals progress, including cross sections, levels and structures. These details should include any temporary or phased arrangements necessary for the construction of the scheme; including how and when these will be brought forward and become operational. SCC believes there are also further opportunities to include sustainable drainage systems within the scheme.

2.5 Geology, Assets and Waste

SCC is satisfied with the approach, assessment methodology, identified likely effects and proposed mitigation measures presented by the applicant in the documents reviewed. A number of observations have, however been made on the baseline data presented but it is not considered that these affect the overall outcome of the assessment.

2.6 Archaeology and Cultural Heritage

It is understood that the results of the archaeology fieldwork will be submitted during the application process and so it is envisaged that all required information will be available prior to any determination. The later submission of the geophysical survey and trial trenching will enable a mitigation strategy to be designed.

The construction and operation of the proposed dualling of the A303 has the potential to result in adverse impacts on cultural heritage assets in South Somerset, particularly Hazlegrove Registered Park (RPG) and Garden where 14% of the RPG will be lost permanently. The District Council considers that the applicant has sought to design a scheme that minimises land take from the RPG, to avoid known archaeological sites and limit the impact on historic buildings and areas. The assessment of effects set out in the Environmental Statement is supported with the exception for a small number of heritage assets which have either been overlooked or the judgement of heritage value or magnitude of impact is challenged. The District Council seeks in these cases, a reassessment of the effects of the proposal on the heritage asset and sufficient mitigation to be secured through the DCO for these effects, including a requirement for consultation with the District Council on matters relevant to its functions at the detailed design stage. Specific details of the mitigation considered necessary to conserve, protect or enhance assets for future generations are set out in the relevant section of this report.

2.7 Air Quality and Omissions

Air quality is generally good in South Somerset, with low levels of sulphur, oxides of nitrogen and particulates in comparison to the rest of England. The District Council raises no significant air quality issues as a result of the proposed scheme, although the concerns over increased traffic in West Camel and Sparkford require the applicant to undertake additional investigative work.

2.8 Biodiversity, Ecology and Natural Environment

The applicant has considered the likely significant effects of the proposal on important ecological resources including designated sites, habitats and species and in their opinion have sought to design the proposed dualling scheme to avoid and minimise habitat loss in the long term. The District Council is however concerned about the potential impacts of the scheme both over the construction period and during the operation of the new A303 on habitat loss, tree coverage (loss and replacement), Bat survey and mitigation and species mortality. It considers that further surveys, analysis and assessment is required to clearly understand these likely significant effects and consultation with the District Council's consultant ecologist prior to undertaking this further work is strongly encouraged. The Council also believes that the mitigation currently proposed is not sufficient to avoid significant harm to biodiversity interests and further mitigation is sought. Details of much of this mitigation is currently unclear and therefore it is crucial that the DCO includes a

requirement for the applicant to consult with the District Council on detailed scheme design matters.

2.9 Noise and Vibration

The Council raises no significant issues in respect of noise and vibration. There are concerns over increased traffic in West Camel and Sparkford.

2.10 Landscape and Visual Effects

The proposed dualling of the A303 has the potential to result in adverse effects on landscape character and visual amenity. In general, the District Council agrees with the assessment undertaken by the applicant and the proposed mitigation works which have been carefully considered to counter local effects. However, the District Council disagrees with the conclusions made for five sensitive receptors and therefore seeks further mitigation for these. The District Council would like the applicant to reassess the effect of the proposal on these receptors and specific details of the mitigation considered necessary to avoid or minimise harm to landscape character, views and visual amenity.

2.11 Socio-economic Effects on Surrounding Communities

The economic value and positive benefits that the proposed dualling scheme will provide through increased capacity, improved connectivity and journey resilience for South Somerset and the wider South West is recognised and supported by the District Council. The Council recognises this in its Local Plan Review where it looks at maximising the economic benefits of the proposed upgrade. The provision of a new construction workforce locally will also be beneficial for the economy. The Council is however aware that there is some concern amongst the business community that if approved, there may be disruption during the construction of the proposed scheme which would adversely impact upon businesses and that the viability of some route-reliant businesses will be adversely affected in the long-term. Suitable mitigation and compensation is sought.

The benefits of a safer route are recognised and welcomed but there are concerns from the communities of West Camel, Queen Camel and Sparkford regarding increased vehicle movements through their communities as a result of the proposed scheme and the adverse effects of this. Additionally, there are some concerns about the potential impacts on communities further away from the scheme as a result of capacity issues that arise at Podimore Roundabout during the summer months because of the proposed scheme. Suitable mitigation is sought for these communities. Diversionary routes and the impacts upon communities is also of concern.

3. Scheme Description

3.1 Overview

The applicant is proposing to develop a dual carriageway on the existing single carriageway section of the A303 between Sparkford and Ilchester in Somerset. The new dual carriageway section of the road will connect to the existing dual carriageway sections of the A303 to the east and west. The scheme also involves the removal of direct access junctions and replaces them with split-level junctions using slip roads.

The scheme is a Nationally Significant Infrastructure Project and is therefore being determined under the planning regime for such projects.

3.2 Description of the existing route corridor

The A303 forms part of the strategic road network and a strategic link between the south-west peninsula and the rest of the south, south-east and London. The route is comprised of multiple road standards including dual carriageway, single carriageway, and single carriageway sections with overtaking lanes. Speed limits also vary between 40mph and 70mph depending on the character of the road and its surroundings.

3.3 Existing project road

The section of the A303 that is being upgraded as part of this project commences at the eastern limits of the existing dual carriageway Podimore Bypass. Travelling east, the route reaches the junction with the B3151 before bearing north east and rising upwards through Canegore Corner to reach the crest of Camel Hill at Eyewell. This section of the route is characterised by a single lane road, with double white lines prohibiting overtaking and subject to a 50mph speed limit. There are several priority junctions along the route giving access to the settlements of Queen Camel and West Camel to the south and Downhead to the north, as well as several farm accesses and parking laybys.

From the crest of Camel Hill, the route descends to meet the roundabout at the western limit of the dual carriageway at Sparkford Bypass ('Hazlegrove Roundabout'). This section comprises two lanes in the westbound direction, one lane in the eastbound direction and is also subject to a 50mph speed limit. Hazlegrove Roundabout forms a junction between the A303 and the A359 which runs south through Queen Camel and north-east through Sparkford. The roundabout also provides access to a service station, and to a school at Hazlegrove House.

The section of the A303 that is to be upgraded is almost 3.5 miles, or approximately 5.6 kilometres in length.

3.4 Scheme proposals

The proposed Scheme is to provide a continuous dual carriageway on the A303 linking the Podimore Roundabout and the Sparkford Bypass. The Scheme will involve the removal of at-grade junctions and direct accesses. The new junctions will be constructed to grade separated standards, or to compact grade separated standards depending upon anticipated traffic flows.

3.5 Scheme Description

The route follows the existing corridor of the A303 very closely. It is generally considered to be an online solution although is often deliberately aligned just to the side of the existing carriageway in order to allow re-use of the existing route for local access, to avoid property or facilitate construction. At its maximum offset the route is typically 100m either north or south of the existing A303.

At its western limits, the route ties in with the existing dual carriageway at A303 Podimore Bypass. Travelling eastwards, the route initially follows the existing A303 closely until the B3151 before moving north of the existing carriageway and rising up just to the south of Downhead before crossing over the existing A303 at Canegore Corner. The route then takes a southerly alignment briefly before meeting up with the existing road again to pass between a Scheduled Ancient Monument and a Ministry of Defense (MOD) signal station at the crest of Camel Hill. Finally, the route then bypasses the existing Hazlegrove Roundabout to the north through a registered park and garden associated with Hazlegrove House before tying into the existing A303 north of Sparkford Village.

A new all movements grade separated junction will be provided near the Hazlegrove Roundabout. The junction will incorporate entry and exit slip roads in both directions providing connections to Hazlegrove House, the A359, access to villages south of the route, and access to properties at Camel Hill to the north of the route. A limited movements junction comprising eastbound slips only will be provided in the vicinity of Downhead. A limited movement junction will be provided in the vicinity of the junction with the B3151 comprising westbound exit and entry slip roads.

A connection will be provided between local roads to the north and south of the route in the vicinity of Canegore Corner via an overbridge, incorporating a link to the A303 eastbound via the junction at Downhead. At the western end of the Scheme the existing westbound slip road to Podimore village will be closed. Access to Podimore village will therefore be via the A303 / A37 junction ('Podimore Roundabout').

4. Policy Framework

- 4.1 The Joint Councils understand that the Planning Act 2008 requires applications for the development of Nationally Significant Infrastructure Projects (NSIPs) on the national road and rail networks in England to be decided in accordance with the National Networks National Policy Statement, referred to as 'NPS'. It provides the planning guidance for promoters of such projects and is the basis for the examination by the Examining Authority and decisions by the Secretary of State.
- 4.2 The framework for the Joint Councils position is provided in reference to the relevant development plan policies, supplementary planning guidance or documents, development briefs and approved master plans. This document does not present a comprehensive analysis of full policy compliance, but signposts these documents where appropriate to support the analysis of local impacts. Reference is made to National Policy Statements (NPS) and legislative compliance where appropriate to support the Joint Councils position. Should further plans or policies become relevant during the course of determination of the DCO application this will be set out in relevant written submissions.

5. Format of Local Impact Report (LIR)

- 5.1 The content of the LIR has been informed by the PINS Advice Note 1. The Advice Note states that;

“The sole definition of an LIR is given in s60(3) of the Act as ‘a report in writing giving details of the likely impact of the proposed development on the authority’s area (or any part of that area)’. The content of the LIR is a matter for the local authority concerned as long as it falls within this statutory definition.”

The Joint Councils, in considering the Advice Note have incorporated the following considerations into the summary tables:

- Relevant planning history and any issues arising;
- Relevant development plan policies, supplementary planning guidance or documents, development briefs or approved master-plans and an appraisal of their relationship and relevance to the proposals;
- Relevant development proposals under consideration or granted permission but not commenced or completed;
- Local area characteristics such as urban and landscape qualities and nature conservation sites;
- Local transport patterns and issues;
- Site and area constraints;
- Designated sites;
- Socio-economic and community matters;
- Consideration of the impact of the proposed articles and requirements within the draft Order (such as the scheme) in respect of all of the above; and
- DCO obligations and their impact on the local authority’s area.

5.2 Local Impact Assessment Scoring Criteria

In accordance with the PINS Advice Note 1 the Joint Councils have characterised issues according to their local impact, setting out whether impacts are positive, negative or neutral. A five point scale has been used to describe impacts as set out below. The advice note does not set out guidance on the determination of impacts but does state that the LIR should not replicate the EIA. The scoring is therefore based on a combination of the professional judgement and extensive experience of the planning authorities and their advisors, and through reference to the supporting information.

Five point local impact scale Impact	Strongly negative	Negative	Neutral	Positive	Strongly positive
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Where negative impacts are identified the Joint Councils have set out mitigation options that they consider are required in order for the adverse effects of the Proposed Development to be reduced.

6. Assessment of Impacts

Archaeology					
Summary: - The information contained within the Environmental Statement Chapter 6 Cultural Heritage does not include the full suite of field investigations required to assess the significance or impacts of heritage assets (National Policy Statement for National Networks (NPSNN) paragraph 5.127). As stated (in paragraph ES 6.9.12) a Written Scheme of Investigation (WSI) must be agreed and submitted during the DCO process based on the results of the field evaluation as required by The NPSNN (5.141).					
Ref	Specific Issue	Rating	Summary of Council's proposed mitigation (including link to other representation)	Relevant Planning Consideration Reference (NPS, Local Policy, Guidance, Local Evidence etc.)	Add/Amend DCO Requirement/ Obligation (Y/N)
A1	Field Investigations The Joint Councils consider that the full suite of field investigations required to assess the significance of impacts on heritage assets is submitted during the Examination in order to understand the impacts and consider what mitigation measures are necessary. The current application data does not include the full suite of field investigations required to assess the significance or impacts of heritage assets (ES 6.9.12) as required by <i>The National Policy Statement for National Networks</i> (NPSNN) and <i>The National Planning Policy</i> paragraph 189 (NPPF). It is understood that the applicant does intend to submit the results of investigations during the Examination; para 6.5.2 of (insert chapter title) provides, "...a programme of geophysical survey and trial trenching is currently being undertaken as part of the archaeological mitigation strategy (see section 6.9 of this chapter). The results of these archaeological investigations will be submitted as other environmental information to support the Development Consent Order (DCO) application during the examination period."		Request for further information to inform assessment of impact	National Policy Statement for National Networks (NPSNN) Para 5.127 outlines "where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, the applicant should include an appropriate desk-based assessment and, where necessary, a field evaluation." NPSNN Para 5.128 provides that the Secretary of State will need to take account of evidence and expertise from "relevant information provided with the application and, where applicable, relevant information submitted during examination of the application...." National Planning Policy Framework (NPPF) Para 189 provides that "Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation."	N/A
A2	Assessment of Evaluation to inform mitigation As stated (in paragraph ES 6.9.12) a Written Scheme of Investigation (WSI) must be agreed and submitted during the DCO process based on the results of the field evaluation as required by The NPSNN (5.141).		The Written Scheme of Investigation will require approval during the Examination stage.	NPSNN Para 5.141 provides that "The Secretary of State may add requirements to the development consent order to ensure that this is undertaken in a timely manner in accordance with a written scheme of investigation that meets the requirements of this section and has been agreed in writing with the relevant Local Authority (or, where the development is in English waters, with the Marine Management Organisation and English Heritage) and that the completion of the exercise is properly secured."	N/A

Transport					
Summary: - The scheme submitted is still only at preliminary design stage, and whilst advanced, is not finalised. There are points of detail that SCC have raised concerns / sought clarification upon. Such items can only be closed out / suitably addressed once the scheme has progressed to the detailed design stage. Further discussion is required in relation to de-trunking to agree the appropriate legal mechanism to include matters associated with process and maintenance due to the potential issue of creating future maintenance liabilities for the County Council. Arrangements for managing traffic during construction need to be developed prior to commencement on site and a mechanism agreed to enable any unintended or unassessed impacts to be addressed. Concerns exist about the modelled increase in traffic on Sparkford High Street and West Camel. Traffic calming measures and other associated mitigation measures should be explored and considered through the DCO process and a mechanism established to secure this mitigation.					
Ref	Specific Issue	Rating	Summary of Council's proposed mitigation (including link to other representation)	Relevant Planning Consideration Reference (NPS, Local Policy, Guidance, Local Evidence etc.)	Add/Amend DCO Requirement/ Obligation (Y/N)
T1	<u>Preliminary scheme design</u> Design: In respect of new local road provision, SCC has accepted the principle of the preliminary scheme design layout, design speeds and cross sections. There are points of detail that SCC have raised concerns/ sought clarification on. Such items can only be closed out/ suitably addressed once the scheme has progressed to the detailed design stage. A summary of our outstanding issues is provided below: • SCC still have concerns regarding proximity of Downhead Lane with the Downhead Junction diverge. • SCC believe the retained section of Steart Hill should be widened to 6.5m in order to carry traffic to Camel Hill Quarry. • A plan is required indicating infrastructure and land which is the responsibility of Highways England and infrastructure and land that will be maintained by Somerset County Council. • Drawings are required indicating all visibility splays. • B3151 Link / Camel Cross Junction Link: Junction layout is acceptable provided traffic flows are commensurate with the layout. • Downhead Junction Link: Junction layout is acceptable provided traffic flows are commensurate with the layout. • Downhead Junction Link: Some concerns over the vertical alignment of certain elements of the link to be resolved. • Concerns over the gradient of Steart Hill Link at the junction with Downhead Junction Link. • Confirmation required that Steart Hill Roundabout and approaches are designed to TD16. • Confirmation required that Camel Hill Roundabout and approaches are designed to TD16. • Concerns regarding proximity of Howell Hill Link and the proposed A303 – fencing, drainage, pavement stability, visibility screen, NMU facility in verge. • Confirmation required that the proposed junctions and single lane slip roads in the vicinity of Hazlegrove are adequate to carry proposed traffic flows. • Proposals for gradients of Private Means of Access at their junctions with local roads are required. • Proposed construction of accommodation tracks.		The DCO should be amended to include provision for SCC as the Local Highway Authority to approve the relevant detailed design matters where the works impact on the prospective Local Road Network (LRN). The DCO should include provision for the associated fees in connection with undertaking the detailed design review to be secured. SCC superintendence fees are based on 8.5% of the total highway construction cost.	NPSNN Para 4.20 provides “<i>Should the Secretary of State decide to grant development consent for an application where details are still to be finalised, this will need to be reflected in appropriate development consent requirements in the development consent order</i>” Safe Roads in Somerset: Road Safety Strategy 2017 – 2028 – Somerset County Council has adopted a Safe System Approach to road safety. An effective and safe road system for Somerset requires a pro-active approach, ensuring that safety is considered in the planning and building of all new developments, prioritising the needs of the most vulnerable road users.	Amend DCO Requirement 12 to enable detailed design review/ approval by SCC. Obligation within the DCO to secure payment of fees.

	- Concerns over vertical profile of Steart Hill (north) at its junction with Steart Hill Link, and its adequacy to carry quarry vehicles. - SCC have requested that details of approved departures from standards on local roads are forwarded as soon as they are available. - The “principles” of the drainage strategy have been accepted however no detailed design submissions have been issued to SCC to date. - Highway lighting proposals are still under review. SCC is concerned that the DCO as currently drafted does not include provision to allow SCC as the Local Highway Authority to approve detailed design matters as they relate to the Local Road Network (LRN). Requirement 12 as currently drafted provides that the local highway authority will only be <i>consulted</i> on detailed design matters which are not compatible with the preliminary design. Maintenance Phase: The current wording within the DCO does not reference any maintenance period post completion of the highway works and prior to new network becoming incorporated into the local road network. These sections include links to be de-trunked, where alterations to the existing network are proposed and where sections of new carriageway construction are outlined. SCC have concerns that should defects appear immediately post construction SCC would be liable for the associated maintenance costs. It is standard practice within SCC’s S278 legal agreements for a maintenance period to be served prior to adoption to limit risk to the adopting authority. It is essential that provision is made within the DCO for SCC to receive the necessary commuted sum payments for structures or other non-standard assets that require future capital maintenance as a result of the detailed design. To date, the applicant has not submitted design proposals to confirm if highway infrastructure is proposed that will, under normal circumstances require a commuted sum. Provision is needed within the DCO requiring the undertaker to pay any necessary commuted sums for structures to be adopted by SCC. The value of the commuted sum to be calculated by SCC.		The DCO should include provision for a minimum 12month maintenance period to be provided between the date of completion and the sections of carriageway becoming incorporated into the local road network. As per the provision currently outlined in 13(3). The DCO should include a provision to enable SCC to attract commuted sum payments for highway infrastructure requiring extra over maintenance.		Provide a mechanism(s) that ensures a minimum maintenance period of 12months and the provision of commuted sum payments to LHA where structures, and other non-standard assets, are offered to the LHA for adoption as a result of the scheme.
T2	<u>Signage and Road Markings</u> The principle of the signage strategy has been approved. Minor detail issues will require clarification, once the scheme has progressed to the detailed design stage. These matters include: - Detailed sign face designs will be required for SCC approval. - No through road signs will be required for those roads that are being stopped up (i.e. Traits Lane, Gason Lane). - Historic finger signs may require modification to reflect new routes and distances as a result of the proposals. These should be identified, and proposals made for SCC approval. - The applicant has made minor amendments to the signage strategy on the approaches to the Hazlegrove junction in order to ensure proposed signage can be accommodated within the land available. These amendments require further review. SCC are concerned that the DCO as currently drafted does not include provision to allow SCC as the Local Highway Authority to approve detailed design matters where they relate to the Local Road Network (LRN). Requirement 12 as currently drafted provides that the local highway authority will only be <i>consulted</i> on detailed design matters which are not compatible with the preliminary design.		The DCO is to be amended to include provision for SCC as the Local Highway Authority to approve the relevant detailed design matters where the works impact on the prospective LRN.	NPSNN Para 4.20 (as above)	Amend DCO Requirement 12 to enable detailed design review / approval by SCC.

	Link to EC12				
T3	<u>Structures</u> Design Phase: To date, the applicant has not submitted proposals in sufficient detail to enable the local highway authority to confirm whether any structures will be required within the extent of the local road network. The current version of the DCO indicates that where a structure is present within the LRN the LHA will adopt from its completion. SCC are concerned that the DCO as currently drafted does not include provision to allow SCC as the Local Highway Authority to approve detailed design matters as they relate to the Local Road Network (LRN). Requirement 12 as currently drafted provides that the local highway authority will only be <i>consulted</i> on detailed design matters which are not compatible with the preliminary design. Maintenance Phase: The current wording within the DCO does not reference any maintenance period post completion of the highway works, (including structures) and prior to new network becoming incorporated into the local road network. These sections include links to be de-trunked, where alterations to the existing network are proposed and the sections of new carriageway construction are outlined. It is essential that provision is made within the DCO for SCC to receive the necessary commuted sum payments for structures or other non-standard assets that require future capital maintenance as a result of the detailed design. To date, the applicant has not submitted design proposals to confirm if highway infrastructure is proposed that will, under normal circumstances require a commuted sum. Provision is needed within the DCO requiring the undertaker to pay any necessary commuted sums for structures to be adopted by SCC. The value of the commuted sum to be calculated by SCC.		The DCO is to be amended to include provision for SCC as the Local Highway Authority to approve the relevant detailed design matters where structures are proposed within the extent of the local road network. The DCO should include provision for a minimum 12 month maintenance period to be provided between the date of completion of the structures and their incorporation into the local road network. As per the provision currently outlined in 13(3). The DCO should include a provision to enable SCC to attract commuted sum payments for highway infrastructure requiring extra over maintenance.	NPSNN Para 4.20 (as above)	Design Amend Requirement 12 to enable detailed design by review / approval by SCC. Maintenance Provide a mechanism(s) that ensures a minimum maintenance period of 12 months and the provision of commuted sum payments to LHA where structures, and other non-standard assets, are offered to the LHA for adoption as a result of the scheme.
T4	<u>Construction Proposals</u> There are no objections to the current construction proposals in principle. SCC have requested that phased construction management plans are prepared, including details of temporary road closures and traffic regulation orders required, so that the impacts of the construction phase on the local road network can be determined. To date, SCC have not received such details. The applicant has shared a draft Local Operating Area agreement with SCC. SCC will however need to agree the final Local Operating Area agreement. Traffic Management Plan The Statement of Common Ground records that Highways England has developed an outline Traffic Management Plan and that the main contractor will continue to develop these proposals throughout 2019 and leading up to commencement on site.		DCO to include provision for SCC as the Local Highway Authority to approve relevant detailed matters associated with the Detailed Local Operating Agreement and Construction Traffic Management plans. In the absence of any commitment/ clarity	NPSNN Para 4.20 (see above)	New Requirement: A Requirement stipulating the need for a Detailed Local Operating Agreement (DLOA) to be entered into prior to commencement is needed to protect local road network assets during the construction phase. Requirement 11 should be amended to enable the Traffic Management

	As a result, details for the management of traffic during construction are not yet clear though provisions of Articles 15, 16 and 19 of the DCO and Requirement 11 are noted regarding implementation of temporary traffic regulatory measures and approval of the Traffic Management Plan. Although the applicant has said that it will ensure any significant Traffic Management operations (for example full closure of the A303) are planned well in advance, it is unknown the frequency and length of any diversions. As noted by the ExA in its written questions, the draft Traffic Management Plan [APP-150, Appendix A, paragraph 2.3.5] indicates to construct the works it is proposed to suspend the current 7.5 tonne weight limit on the A359 for various items of permanent and temporary works. The existing 7.5 tonne weight limit (except for access) order was introduced on environmental grounds to maximise the retention of HGV traffic on the strategic network and reduce the volume of traffic 'rat running' of large vehicles through the settlements of Queen Camel, Marston Magna and Mudford. Until the Applicant submits detailed construction traffic management proposals confirming the dates, the exposure period and the mitigation measures proposed, if any, it is difficult to determine the effects. It should be noted, however, that the applicant has already accepted that it would assist traffic flow if the A359 through Queen Camel were subject to traffic control in light of the number of narrow sections of carriageway with priority to oncoming traffic. This community could be significantly impacted by the diversion route, but no mitigation has been offered. The applicant has not recognised that there is also a risk of rat running to avoid lengthy diversions. This is likely in relation to the proposed diversion via the A359 where local experience suggests that drivers will instead use the unclassified local road network especially around Wales and West Camel – this already appears to happen when the A303 between Sparkford and Ilchester is congested and the local communities are well placed to articulate the practical issues this causes. In the absence of any commitment/ clarity, an obligation should be secured for measures to be undertaken by the applicant for it to address any unintended or unassessed impacts which arise as a result of carriageway closures. A financial contingency should also be secured for Somerset County Council to be able to undertake any road repairs that become necessary as a result of diverted and/ or rat running traffic. In addition to the above, see comments in relation to LIR issue EC15.		regarding detailed construction traffic management proposals, a mechanism should be secured for measures to be undertaken by Highways England for it to address any unintended or unassessed impacts which arise as a result of carriageway closures. A financial contingency should also be secured for Somerset County Council to be able to undertake any road repairs that become necessary as a result of diverted and/ or rat running traffic.		Plan to be approved by the LHA. An obligation is necessary to secure the necessary measures to address impacts which arise as a result of implementation of the construction traffic management plan.
T5	<u>Maintenance Provision and Extents of Responsibility</u> There is an in-principle level agreement on proposed limits of responsibility. 'Broad brush' guiding principles have been established which will be used for the preparation of plans depicting limits of responsibility, however details have not yet been provided. The submission of further details will require submitting to confirm actual extents. Linked to comments above, it is essential that the LHA have the ability to review / approve the detailed design as this could impact upon the LHA's future maintenance operations.		DCO to include provision for SCC as the Local Highway Authority to approve relevant detailed design matters.	NPSNN Para 4.20 (as above)	Amend Requirement 12 to enable detailed design review and approval by SCC.
T6	<u>Regulatory Measures on Local Roads</u>		DCO to include provision for SCC as the Local Highway Authority to	NPSNN Para 4.20 (as above)	Amend Requirement 12 to enable detailed design review and approval by SCC.

	No detailed design submission has been issued to SCC. The LHA require the ability to review and approve the detail design particularly where the proposals impact upon the existing or prospective local road network provision.		approve relevant detailed design matters.		
T7	<u>De-trunking Works</u> Design Phase SCC has accepted the principle of the de-trunking proposals which include the reduction in width of the four sections of the A303 carriageway and incorporation into the local road network. SCC has accepted in principle the proposal to de-trunk the elements of existing A303 carriageway identified in the de-trunking plans (HE5515507-MMSJV-LSI-000-DR-UU-2162 to 2164, and for them to be incorporated into the local road network. The timing provisions as set out within the DCO are however not yet agreed and Article 14 will need amending accordingly. SCC require that the assets to be de-trunked are clearly recorded, inspected, rehabilitated and commissioned prior to hand-over. A 12 month maintenance period between completion of the works and hand-over is also expected. SCC would expect the surfacing of the existing footway between Camel Cross and Howell Hill to be replaced. The proposals currently do not include this. SCC would expect the surface of the de-trunked carriageways to be re-profiled so that the crown line is at the centre of the carriageway. This is particularly relevant where the current carriageway is essentially three lanes wide. SCC require further details of proposals for the existing A303/Downhead Lane junction which is to be retained for use as a bridleway crossing. There are several sections of existing vehicle restraint systems alongside the existing A303. SCC have requested that these are removed if not required. Currently the proposals do not show this. SCC has requested that the redundant speed camera and associated vehicle restraint system are removed. The current proposals do not show this. SCC has requested that further details be provided regarding the crossing of the existing footpath by the proposed access to Pond 4. SCC has requested details of works to road markings and road studs on the de-trunked sections. SCC has requested that an inventory be provided of Highways England assets that are to be handed over to SCC as part of the de-trunking proposals. The length of highway between Hazelgrove roundabout and the Mattia Diner is proposed to be de-trunked and will become a no through road. As a result, there is an unquantified risk that this length of highway will attract an antisocial use that may lead to significant financial exposure for the County Council in perpetuity.		Given the outstanding items identified it is important that the LHA have the ability to review/approve detailed design proposals relating to the de-trunking works (Works Nos 25,26, 63 & 80) as this will become part of the LRN on completion. The current wording within the DCO does not make reference to any maintenance period between the completion of the de-trunking highway works and the transferring the LRN. Provision within the order should be made for a minimum 12month maintenance period commencing from the date of completion. It is also important that contingency sums are provided for within the DCO to enable the County Council to deal with the potential for anti-social use of the length of highway between Hazelgrove roundabout and the Mattia Diner that is proposed to be de-trunked. Article 14 to be amended to provide satisfactory de-trunking timing provisions.	NPSNN Para 4.20 (as above)	Design Amend Requirement 12 to enable detailed design by review / approval by SCC. Construction It is essential that LHA are the organisation that confirms when the de-trunking highway works (Work Nos 25,26,63 &80) are considered complete before official handover is undertaken. Maintenance Provide a mechanism(s) that ensures a minimum maintenance period of 12 months and the provision of commuted sum payments to LHA where structures, and other non-standard assets, are offered to the LHA for adoption as a result of the scheme. Article 14 to be amended to provide satisfactory de-trunking timing provisions. An obligation should be introduced that would enable the County Council to draw down from a contingency to deal with any anti-social use of the length of highway between Hazelgrove roundabout and the Mattia Diner that is proposed to be detrunked

T8	<u>Traffic Modelling</u> The impact of the proposed improvement on traffic has been assessed and is presented in the Combined Modelling and Appraisal (CoMA) report. Somerset County Council, supported by WSP, has considered the modelling approach in detail and considers it to be in line with the Department for Transport’s modelling and appraisal guidance, WebTag. All of the evidence presented herein has been developed by Mott MacDonald Sweco Joint Venture (MMSJV) on behalf of Highways England and analysed by WSP and Somerset County Council. Much of it has been extracted directly from the CoMA report from however additional information has been supplied by MMSJV as follows: - Local Traffic Information for Sparkford and West Camel for Transport Model Review HE551507-MMSJV-MTR-000-RP-TR-0034 - Podimore Roundabout Summer LinSig Analysis Technical Note HE551507-MMSJV-MTR-000-RP-TR-0035 The key issues concluded from this work are: - Increases in traffic in local communities - Summer traffic at Podimore Roundabout. It should be noted that a full Transport Assessment has not been provided with the application and, as a result, the level of significance of the increases in traffic in particular through West Camel and Sparkford have not been assessed by the applicant, including the road safety implications.																				
T9	<u>Traffic Impacts on Local Communities – West Camel</u> Parsonage Road in West Camel is forecast to have an increase in 600 vehicles per day (AADT) by 2038 as a result of the scheme. With the current layout of the A303 the junctions at Howell Hill and Parsonage Lane would constrain through traffic; the A303 would get busier and it would be more difficult to get out of these side turnings because of fewer gaps in the traffic. The traffic through Parsonage Lane is forecast to decrease from the current level of around 1700 vehicles (AADT) to 1400 vehicles (AADT) without the proposed scheme. The proposed scheme provides a new junction which removes the constraints and therefore allows through traffic to increase. The level of significance of the increase in traffic through the village has not been assessed by the applicant. For example, the road safety implications of the increase in traffic has not been assessed. Traffic calming measures and other mitigation measures should therefore be explored and considered by the ExA, and a mechanism established to secure such mitigation. The sense of impact has already been emphasised by local communities and is reinforced in their Examination submissions. Table 1: - Two-way traffic flows on Parsonage Lane West Camel (PCU/hr) <table><tr><th>Time period</th><th>Base year 2015</th><th>2038 Without the A303 Scheme</th><th>2038 With the A303 Scheme</th></tr><tr><td>AM</td><td>121</td><td>89</td><td>143</td></tr><tr><td>IP</td><td>91</td><td>69</td><td>133</td></tr><tr><td>PM</td><td>106</td><td>95</td><td>123</td></tr></table>	Time period	Base year 2015	2038 Without the A303 Scheme	2038 With the A303 Scheme	AM	121	89	143	IP	91	69	133	PM	106	95	123		It is recommended that mitigation is introduced into the local highway such as traffic calming.	NPSNN Para 5.217 provides “<i>mitigation measures may relate to the design, lay-out or operation of the scheme</i>” NPPF para 102 part D provides “<i>Transport issues should be considered from the earliest stages of plan-making and development proposals, so that (d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains...</i>” NPPF para 108 part C provides “<i>In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that (c) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.</i>” NPPF para 110 part C provides “<i>...applications for development should (c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards.</i>”	The mitigation would need to be secured via a planning obligation
Time period	Base year 2015	2038 Without the A303 Scheme	2038 With the A303 Scheme																		
AM	121	89	143																		
IP	91	69	133																		
PM	106	95	123																		
T10	<u>Traffic impacts on local communities – Sparkford High Street</u> Sparkford High Street is south of A303 Sparkford Bypass and runs parallel to it. The Do something proposed scheme causes significant increases in traffic on Sparkford High Street. Table 2 provides traffic flows for the scenarios without and with the proposed A303 improvement scheme. The main reasons for the increase in traffic in the Do Something are: In the scenario without the scheme, traffic from the south travelling northbound through Queen Camel on the A359 joins the Hazelgrove roundabout and then joins		It is recommended that mitigation is introduced into the local highway such as traffic calming.	NPPF paragraph 102 part D (see above), paragraph 108 part C (see above), paragraph 110 part C (see above)	The mitigation would need to be secured via a planning obligation																

	the A303 eastbound and it then joins the A359 through the existing connection between the A359 and A303. The scheme changes the layout of the network. This increases the travel distance to A359 north via the replacement junction. As a result, the traffic travelling from the south on the A359 finds that the Sparkford High Street provides a better direct connection to A359 north. As a result of the scheme, the traffic that would otherwise would use the A37, reassigns to the A359 and this also results in an increase in the southbound traffic on Sparkford High Street. Table 2: - Two-way traffic flows on Sparkford High Street (PCU/hr) <table><tr><th>Time Period</th><th>Base Year 2015</th><th>2038 Without A303 Improvement</th><th>2038 With A303 Improvement</th></tr><tr><td>AM</td><td>304</td><td>366</td><td>460</td></tr><tr><td>IP</td><td>236</td><td>303</td><td>449</td></tr><tr><td>PM</td><td>325</td><td>328</td><td>537</td></tr></table> The level of significance of the increase in traffic through the village has not been assessed by the applicant. For example, the road safety implications of the increase in traffic has not been assessed. Traffic calming measures and other mitigation measures should therefore be explored and considered by the ExA, and a mechanism established to secure such mitigation. The sense of impact has already been emphasised by local communities and is reinforced in their Examination submissions.	Time Period	Base Year 2015	2038 Without A303 Improvement	2038 With A303 Improvement	AM	304	366	460	IP	236	303	449	PM	325	328	537				
Time Period	Base Year 2015	2038 Without A303 Improvement	2038 With A303 Improvement																		
AM	304	366	460																		
IP	236	303	449																		
PM	325	328	537																		
T11	<u>Summer traffic at Podimore Roundabout</u> Podimore Roundabout is not within the scheme extents. It is the next junction on the A303 to the South West of the scheme. The junction has been included within the Combined Modelling and Appraisal Report but is not included within the Environmental Impact Assessment. An operational assessment of the junction was carried out using a LINSIG traffic model. This shows that in the 2038 scenario with the A303 improvement is nearing capacity in the evening peak hour as shown in table 12.18 of the CoMA report. As a result, concerns were raised about the ability of the roundabout to cope with peak summer traffic and the impact that this might have on the local road network. Another assessment was carried out by MMSJV to establish the impact of the summer traffic on the junction, the results are set out in the Podimore Roundabout Summer LinSig Analysis Technical Note (HE551507-MMSJV-MTR-000-RP-TR-0035). The results of this work are summarised in table 3, all of these are for the summer interpeak period as per the model. The queue lengths are approximated based on the Linsig outputs by assuming a passenger car unit (PCU) is 6m long and using the guidance for approximating queues which states “When a Lane is oversaturated the Maximum Queue within each cycle will grow progressively over the modelled time period. This means that the Mean Maximum Queue will be approximately half the final queue at the end of the modelled time period”. Table 3:		This junction is included for improvement as part of the A303 corridor however there is currently no certainty about the nature and timing of this improvement. It is therefore advised that an interim improvement to increase the capacity at the junction is developed; the nature of this will depend on the existing infrastructure and the current signal control systems. However, such measures should be sufficient to mitigate the impact.	NPPF paragraph 102 part D (see above), paragraph 108 part C (see above), paragraph 110 part C (see above)	The mitigation may need to be secured via a planning obligation																

	Roundabout entry arm	2023		2031		2038					
		DoS	Queue length (m)	DoS	Queue length (m)	DoS	Queue length (m)				
	A303 EB	97%	467	106.6%	960	110.4%	1232				
	A372	94.8%	148	100.7%	379	109.2%	509				
	A37	89.5%	65	119.3%	840	103.7%	364				

Public Rights of Way						
Summary: - Overall, it is accepted that the mitigation proposed by the applicant for the loss and impact on the rights of way network is, in broad terms, generally appropriate. Whilst no sole non-motorised over/under bridges are proposed, it is recognised that those provided as part of the road network will be designed to be accommodating of non-motorised users, and there is not sufficient evidence to warrant the introduction and expense of an additional and separate non-vehicular crossing. However, there are a number of issues as detailed in the table below that illustrate that there is more that the applicant could do to not only provide appropriate and necessary mitigation, but also to further improve the proposals to the benefit of all non-motorised users. There are 3 significant issues; i) the validity of the 1996 side roads order (issue 3), ii) the lack of appropriate mitigation for the stopping up in part of bridleway Y 30/28 (issue 4), and iii) having sufficient mitigation in place to address any unrecorded rights that may be impacted upon by the development (issue 6). There are a number of other issues besides, which are not insignificant and are covered in detail below. Where it is felt there is cross-over or interdependency between issues, this has been highlighted. It should be noted that the applicant has begun to address some of the issues, but there are some that it is believed they are not prepared to address e.g. issue 4.						
Ref	Specific Issue	Rating	Summary of Council's proposed mitigation (including link to other representation)	Relevant planning consideration Reference (NPS, Local Policy, Guidance, Local Evidence etc)	Add/Amend DCO Requirement/ Obligation (Y/N)	
P1	Non-Motorised User Survey Results Survey methodology for public rights of way (Ref. 6.3 Environmental Statement Appendix 12.1; 1.1.2) The methodology for assessing the usage of the network is not without flaws. The surveys were conducted between 8:00 and 18:00 hrs on week days in term time and school holidays. Daylight hours on the survey days would have been longer than the survey times and would arguably have omitted those early and late users. Many equestrians often ride out early in the morning, as do many dog walkers and runners, possibly prior to going to work. Equally there'll be likely use of the network after 18:00 once people have returned home from work. Weekends are often a more popular time of the week to undertake use of the rights of way network, thus in not surveying weekend days, considerable use of some routes has potentially been overlooked. In summary, by not covering full daylight hours, nor weekend days, the results of non-motorised user surveys is not entirely representative of the actual use.		None suggested. However, the survey results cannot be relied upon as a true representation of usage levels of public rights of way.	The County Council has no user data in relation to specific routes to counter that put forward by the applicant. However, as part of the Network Assessment for the first Rights of Way Improvement Plan in 2006, a countywide horse and rider census was undertaken. Whilst this data is some 15 years old now, it is a useful indication of likely numbers of riders and carriage drivers local to the application area. Of the 9 parishes in and around the application area, data is held for 7 of them, totalling 155 riders and 3 carriage drivers. It is plausible that the carriage drivers are also counted amongst the number of riders, but this shouldn't be assumed. This is a narrow snapshot and it is more than likely that riders and drivers will come from further afield to use the routes in and around the application area, thereby adding to the figures above.		
P2	Traffic Management Plan (Ref. 7.3 Transport Report Appendix 1) The traffic management plan has no consideration of off-road highway network. Other documents do recognise the need for temporary closure and temporary alternatives for those public rights of way that will be affected during the construction phase, however there is limited detail, and this is an area that will need to be considered in full alongside the temporary road closures.		Requirement to amend Traffic Management Plan and Construction Environment Management Plan, to fully incorporate the management of off-road traffic.	Traffic management plans should cover all highways affected and manage those likely to use them.	Noted that draft DCO Requirements 3 and 11 secures the submission of a CEMP and Traffic Management Plan; however, the Councils believe that the documents should be approved at the local	

					level with the Local Planning Authority and Highway Authority, rather than by the Secretary of State. The Plans should also fully incorporate the management of off-road traffic.
P3	Sparkford to Ilchester improvement and slip roads Side Roads Order 1996 (not part of DCO documentation) This order made changes to a number of different roads and rights of way, a notable addition being bridleway Y 30/29 (presumably as mitigation for Y 30/28 terminating at a dual carriageway at grade).		There is the possibility that the 1996 Sparkford to Ilchester Side Roads Order has some validity even though the scheme was not constructed. It is recommended that the order is revoked.	1996 Side Roads Order	The Side Roads Order should be revoked prior to conclusion of the DCO examination. If it is not, then a mechanism will need to be established within the DCO to give effect to such.
P4	Stopping up of bridleway Y 30/28 and lack of upgrade to Y 30/31 (Ref. .1 Draft DCO Schedule 4 Part 1 & Sheet 1 of Rights of Way & Access Plans) The impact of the development is to stop up the connection of Y 30/28 with the A303 and therefore the applicant has to mitigate for that loss. The current proposal from the applicant is provision of a route east to the nearest new vehicular overbridge. The proposed development creates an adverse effect on this section of Public Right of Way. The applicant, in line with the National Policy Statement for National Networks, is expected to take appropriate mitigation measures to address adverse effects on public rights of way. The County Council considers that the proposed mitigation, whilst beneficial to the overall network is not the most appropriate. The length of the alternative route proposed is c.5.2km for walkers, cyclist and equestrians. If instead the alternative was over Y 30/31, this length would be reduced to c.1.5km. This is a considerable difference in length and convenience. This is not asking for a new over/underbridge, but for improvement to an existing Highways England structure. The County Council does recognise that compared to the usability of the existing bridleway network joining the A303, the proposed scheme should represent a more accessible network, however it is contended that more appropriate mitigation could be provided. National Planning Policy Statement for National Networks is clear that applicants are expected to take appropriate mitigation measures to address adverse effects on Public Rights of Way. Chapter 12 of the Environmental Statement refers to increases in journey length of over 500m results in a Major Adverse impact. At 12.10.31 it confirms that this increase in journey applies in 6 instances for non- motorised user journeys, the above example perhaps being the most notable. This is subsequently contradicted at 12.10.33 where there is no reference to any major adverse impacts. Table 12.23 doesn't recognise any change in the journey from Podimore to Eastmead Lane (Y 30/28) with low use being cited as a reason for 'neutral' significance in relation to that impact for that route. This is likely to be an oversight as a result of not recognising that Y 30/29 may not exist as a right of way. It would also only be looking at the significance for pedestrians and overlooking the impact on cyclists and equestrians, given that the accommodation bridge over the existing A303 only carries public footpath rights. It is noted that the applicant is pursuing a Designated Funding application for the legal and physical upgrade of this link, and the bridleway link to Eastmead Lane. However, the County Council believe that upgrade of right of way Y30/UN (Higher Farm Lane) and the associated improvement to the overbridge should be secured through the DCO.		A connecting bridleway to, and the upgrading of public footpath Y 30/31 to bridleway status would be viewed by the Council as necessary; directly related to the development; and, fairly related in scale and kind for the loss of the Y 30/28 terminus. A planning obligation would secure this.	The NPSNN is clear that applicants are expected to take appropriate mitigation measures to address adverse effects on Public Rights of Way. NPSNN Para 3.17 provides that <i>"There is a direct role for the national road network to play in helping pedestrians and cyclists. The Government expects applicants to use reasonable endeavours to address the needs of cyclists and pedestrians in the design of new schemes. The Government also expects applicants to identify opportunities to invest in infrastructure in locations where the national road network severs communities and acts as a barrier to cycling and walking, by correcting historic problems, retrofitting the latest solutions and ensuring that it is easy and safe for cyclists to use junctions."</i> NPSNN para; 5.162 provides <i>"Access to high quality open spaces and the countryside105 and opportunities for sport and recreation can be a means of providing necessary mitigation and/or compensation requirements. Green infrastructure can also enable developments to provide positive environmental and economic benefits."</i> NPSNN para 5.180 provides <i>"Where green infrastructure is affected, <u>applicants should aim to ensure the functionality and connectivity of the green infrastructure network is maintained</u> and any necessary works are undertaken, where possible, to mitigate any adverse impact and, <u>where appropriate, to improve that network</u> and other areas of open space, including appropriate access to new coastal access routes, National Trails and other public rights of way."</i> (emphasis added) NPSNN para 5.184 provides <i>"Public rights of way, National Trails, and other rights of access to land (e.g. open access land) are important recreational facilities for walkers, cyclists and equestrians. Applicants are expected to take appropriate mitigation measures to address adverse effects on coastal access, National</i>	Obligation

				<i>Trails, other public rights of way and open access land and, where appropriate, to consider what opportunities there may be to improve access. <u>In considering revisions to an existing right of way consideration needs to be given to the use, character, attractiveness and convenience of the right of way.</u> The Secretary of State should consider whether the mitigation measures put forward by an applicant are acceptable and whether requirements in respect of these measures might be attached to any grant of development consent.”</i> (emphasis added)	
P5	Provision of a NMU route across the scheme from Podimore to Sparkford The construction road between Steart Hill and Camel Hill and Tracks 4 & 9 would further serve to provide a NMU route across the scheme, were they to be designated as public bridleway or restricted byway. An additional link would be required between the Podimore turning head and the minor road to the west to facilitate this.		Draft DCO and Rights of Way & Access Plans would need amending.	NPSNN para 3.15 provides “<i>The Government is committed to providing people with options to choose sustainable modes and making door-to-door journeys by sustainable means an attractive and convenient option. This is essential to reducing carbon emissions from transport</i>” NPSNN para 3.16 provides “<i>As part of the Government's commitment to sustainable travel it is investing in developing a high-quality cycling and walking environment to bring about a step change in cycling and walking across the country.</i>” NPSNN Para 3.17 (as above) NPSNN Para 3.21 provides “<i>Applicants are reminded of their duty to promote equality and to consider the needs of disabled people as part of their normal practice. Applicants are expected to comply with any obligations under the Equalities Act 2010.</i>” NPSNN Para 3.22 provides “<i>Severance can be a problem in some locations. Where appropriate applicants should seek to deliver improvements that reduce community severance and improve accessibility.</i>” NPSNN para 4.16 provides “<i>When considering significant cumulative effects, any environmental statement should provide information on how the effects of the applicant's proposal would combine and interact with the effects of other development (including projects for which consent has been granted, as well as those already in existence). The Examining Authority may also have other evidence before it, for example from a Transport Business Case, appraisals of sustainability of relevant NPSs or development plans, on such effects and potential interactions. Any such information may assist the Secretary of State in reaching decisions on proposals and on mitigation measures that may be required.</i>” NPSNN para 5.180 (as above) NPSNN para 5.184 (as above)	Amendment to DCO

				Somerset County Council Rights of Way Improvement Plan 2 Action 1.4: <i>Continue to ensure that improvements to the rights of way network are secured through planning applications and that the necessary funds and agreements are sought to implement improvements.</i> Policy Statement 3.1: <i>When improving PRow or creating new PRow, an inclusive approach will be taken from the outset, so that wherever possible the routes will be accessible to horse riders, cyclists, walkers and those with visual and mobility impairments.</i> Policy Statement 3.2: <i>When creating, improving or diverting PRow, we will endeavour to improve connectivity of the network and improve safety when emergence onto or crossing a road is part of the proposal.</i> Action 3.18: <i>Work with developers and relevant stakeholders to streamline, develop and improve the PRow network within and in the vicinity of development. Local mitigation and strategic improvements will be sought through public path orders and where necessary, physical works.</i>	
P6	Applications received to modify the Definitive map and statement (Ref. Draft DCO Part 3, 16 (5)(a) and Part 5, 27 Public Rights of Way.) Two applications have been received for upgrades/ addition of public rights to the Definitive Map & Statement that are impacted upon by the development. It is not known if these higher rights exist until they are fully investigated, and any possible subsequent order is made and confirmed beyond legal challenge. This process would not align with the DCO timetable. Therefore, a separate solution will be required. There are also two applications in close vicinity to the schemes. A plan showing the applications is attached as Appendix 4.		A mechanism is needed within the DCO to provide a detailed legally binding commitment of how these additional rights, if found to exist, will be appropriately mitigated for that would include provision of PRow to appropriate widths. Such a mechanism should ensure any mitigation is achieved to the satisfaction of the County Council.	NPSNN Para 3.22 (as above) NPSNN Para 5.184 (as above) NPSNN Para 5.185 provides “<i>Public rights of way can be extinguished under Section 136 of the Act if the Secretary of State is satisfied that an alternative has been or will be provided or is not required.</i>” Somerset County Council Rights of Way Improvement Plan 2 Action 1.4 (as above) Policy Statement 3.2 - <i>When creating, improving or diverting PRow, we will endeavour to improve connectivity of the network and improve safety when emergence onto or crossing a road is part of the proposal.</i> Action 3.18 (as above)	A suitable mechanism within the DCO
P7	Reference to NMUs (Sheet 1 Rights of Way & Access Plans) Non-motorised users (NMUs) is a term referenced in some of the DCO documents with regards to the provision and improvements that will be made as part of the development. The term doesn't appear to be defined, but in its broadest sense would be taken to include		DCO applicant to review if any of the proposed bridleways could be re-designated as restricted byways to be more	NPSNN Para 3.15 (as above) NPSNN Para 3.21 (as above) NPSNN Para 3.22 (as above)	Update to DCO PRow proposals.

	walkers, cyclists, horse riders and carriage drivers. The horse and rider census revealed a few carriage drivers in the area. The DCO doesn't provide for any off-carriageway routes that would cater for carriage drivers, i.e. restricted byway status. There are no recorded restricted byways that the development impacts upon, however the (recently submitted) application 861M to modify the Definitive Map & Statement is for an upgrade of the existing bridleway Y 30/28 to a restricted byway status. If the higher rights exist and are simply not recorded, then the scheme will be impacting on restricted byway rights and will need to provide for appropriate mitigation. It should also be noted that carriage driving is an accessible form of off-road transport for those less able.		inclusive with regard to NMUs. Links with issues P5 and P6 above.	NPSNN Para 4.60 provides “<i>New highways developments provide an opportunity to make significant safety improvements. Some developments may have safety as a key objective, but even where safety is not the main driver of a development the opportunity should be taken to improve safety, including introducing the most modern and effective safety measures where proportionate. Highway developments can potentially generate significant accident reduction benefits when they are well designed.</i>” NPSNN Para 5.180 (as above) NPSNN Para 5.184 (as above) NPSNN Para 5.185 (as above) Somerset County Council Rights of Way Improvement Plan 2 Action 1.4; Policy Statement 3.1; Policy Statement 3.2 (as above)	
P8	Clarification of routes proposed between Traits Lane and Gason Lane (Sheet 3 of Rights of Way & Access Plans) There are 2 routes proposed between Traits Lane and Gason Lane. This is considered excessive and it is assumed that only one route will be selected, however clarification of such is required		Amendment to Sheet 3 Rights of Way & Access Plans required. Also see issue P16.	Rights of Way Improvement Plan 2 Action 3.18 (see above)	N/A
P9	Excessive gradient between BE and BY (Sheet 3 Rights of Way & Access Plans) 33% gradient proposed between BE and BY. Assuming BE-BY will be bridleway, this gradient is considered excessive for horse-riders.		Applicant is asked to review what can be done to lessen the gradient or provide a sufficient landing area at either end of the slope.	NPSNN Para 3.15 (as above) NPSNN Para 3.16 (as above) NPSNN Para 3.17 (as above) NPSNN Para 3.21 (as above) NPSNN Para 3.22 (as above) NPSNN Para 5.180 (as above) NPSNN Para 5.184 (as above) Rights of Way Improvement Plan 2 Action 1.4; Policy Statement 3.1; Policy Statement 3.2; Action 3.18 (as above)	Revision to gradient, plans to either be updated and consulted upon as part of the Examination, or an additional DCO Requirement is included within the DCO which secures the submission, approval (by the local highway authority) and implementation of an appropriate design.
P10	Changes to path references resulting from updates to the Definitive Map & Statement (Sheets 1-4 Rights of Way & Access Plans, Draft DCO Schedules 3 & 4) Changes to path references resulting from updates to the Definitive Map & Statement		When the Ilchester bypass was provided there was a Side Road Order made in 1974. This made a number	Legal Event Modification Order attached as appendix 5(a), 5(b), and 5(c). Explore Somerset website now shows updated nomenclature	Nomenclature of paths in DCO Schedules 3 & 4 and on the Rights of Way & Access Plans will need

			of changes to the rights of way. These changes have only recently been legally evented to bring the Definitive Map and Statement up to date.		to be updated accordingly.
P11	No reference to limitations on or widths of the proposed public rights of way (Draft DCO Schedules 3 & 4.)		In order to update the Definitive Statement that accompanies the Definitive Map it is best practice to include the width and limitations of the new rights within the order. It can be very difficult to interpret such information from order plans, hence reference to this information is best placed in a schedule.	The Public Path Orders Regulations 1993. Schedule 1 sets out the form of each type of Highways Act order (creation, extinguishment, diversion). The schedule to the order must ‘Describe position, length and width of path or way...’ [my emphasis]. In addition to the Regulations, paragraph 5.13 of <u>Circular 1/09</u> states that ‘...authorities should specify widths in every 1980 Act order’. This is supported by the Planning Inspectorate’s <u>advice note on widths</u>, paragraph 4 seems to be of particular relevance. While there is no strict requirement for provision of limitations within path orders, by doing so it avoids a subsequent authorisation process after the development has been completed and is also more transparent as to what is being proposed as part of the new path network. It is assumed, but not known, that the inclusion of widths and limitations within the DCO will not be contrary to any Planning Act 2008 regulations.	A schedule of limitations and widths to be included as part of the DCO. This could be a pre-commencement requirement if not attainable prior to examination. Work has already commenced on such a schedule. Inconsistencies exist that require resolution.
P12	Column header (2) excludes the term bridleway / potentially restricted byway Draft DCO (Ref. Schedule 3 Part 11)		The column header needs to reflect all of the highway statuses referred to in the column. It currently omits bridleway, and subject to possible amendments, may need to include restricted byway as well.	N/A	Amend column heading to be inclusive of the column contents.
P13	Incorrect path status (Ref. Draft DCO Schedule 4 Part 2 & Schedule 3 Part 11. Sheet 4 Rights of Way & Access Plans.) BM-BN referenced as new bridleway. BO-BP referenced as new footpath. BN-BO omitted. BR-BS and BT-BU referenced as footway/ cycleway.		Amendments required to the DCO.	NPSNN Para 3.15; 3.21; 3.22; 4.60; 5.180; 5.181; 5.184 (see above) SCC Rights of Way Improvement Plan 2 – Action 1.4; Policy statement 3.1; Policy Statement 3.2; Action 3.18 (see above)	Amend DCO to reference BM-BN-BO-BP as new footpath. BR-BS and BT-BU - amend to bridleway or restricted byway to be more inclusive provided a safe equine crossing can be achieved across the A359.
P14	Road junctions and crossings for NMU, Surface treatments and structures. (Ref. Draft DCO Schedule 2 Part 1, 12. Sheets 1-4 Rights of Way & Access Plans.)		It is assumed in developing the mitigation proposals that current governmental design guidance has been followed for road junctions and crossings, particularly	Design Manual for Roads & Bridges and other Transport Notes.	Schedule 2 Part 1, 12 (1)&(2) Detailed design – wording should be amended to be inclusive of Rights of Way & Access Plans to ensure

			in relation to equestrians. Details of surfacing and any other structures are still to be agreed with SCC. DCO must be amended to allow for the submission and approval of the details to SCC.		that the design of the junctions and crossing points for NMUs and the surface treatments are captured under this requirement and that details relevant to SCC in relation to Local Road Network and Rights of Way Network are submitted to SCC for approval.
P15	Future maintenance of new, altered or diverted rights of way and associated structures. (Ref. Draft DCO Part 3, 13) Some of the proposed rights of way are coincidental with, or adjacent to, vehicular access tracks and are more suited to being privately maintained by the applicant as part of their estate management. It would be logical to document those rights of way that will be privately maintained to provide clarity and avoid confusion.		Clear documentation of rights of way that will be privately maintained to provide clarity and avoid confusion.	SCC Rights of Way Improvement Plan 2 – Policy 3.17 (as above)	Inclusion in the DCO of a pre-commencement requirement to produce a schedule of private maintenance of public rights of way to the satisfaction of the Highway Authority.
P16	Omission of path sections from DCO (Sheets 3 & 4 Rights of Way & Access Plans) AW-AY, AZ-BA-BB-?, BZ-CA-CB-CD-?, BL-BK, BD-BY-BN, BY-BE has been omitted from Schedules 3 & 4		Update to the DCO schedules	N/A	Add them to the relevant schedule in the DCO.
P17	Construction Environmental Management Plan (Draft DCO Schedule 2 Part 1, 3.) 3 (f) excludes tie-ins to existing rights of way.		Amendment to the DCO	N/A	Schedule 2 Part 1, 3 (f)(iii) amend 'carriageways' to 'highways' to be more complete.

Lead Local Flood Authority						
Summary: - Under the Flood and Water Management Act 2010, Somerset County Council (SCC) is the Lead Local Flood Authority (LLFA) for the Somerset area and responsible for the management of local flooding (from surface water, groundwater and ordinary watercourses). As the LLFA the county council, in conjunction with the Somerset Drainage Boards Consortium, has engaged with Highways England and its consultants on the flood risk and drainage aspects of this scheme. Discussions have particularly centred on the need to ensure the scheme does not increase flood risk downstream and on the use of sustainable drainage systems (SuDS) to manage surface water in accordance with the National Policy Statement, Non-Statutory Technical Standards for SuDS and locally produced guidance (West of England SuDS Guide). Where appropriate reference has also been made to other technical standards such as the Design Manual for Roads and Bridges. While we have been able to reach agreement on the key principles through discussions between Highways England and the flood risk management authorities these have not translated into the DCO Requirements. This is particularly the case for the design criteria for the drainage system and maintenance arrangements. In addition, there are several items where further information is expected, for example at the detailed design stage of the project. For these items we have included a comment below to ensure there is an appropriate mechanism within the DCO for Highways England to provide the required information for comment and/or approval.						
Ref	Specific Issue	Rating	Summary of Councils proposed mitigation (including link to other representation)	Relevant planning consideration Reference (NPS, Local Policy Guidance, Local Evidence etc)	Add/Amend DCO Requirement/ Obligation (Y/N)	

LLF1	Drainage Strategy The proposed drainage philosophy for the scheme seeks to replicate, as far as reasonably practicable, an un-developed site. Accordingly, the Flood Risk Assessment sets out a strategy to reduce post development peak runoff rates to the equivalent greenfield response up to and including the 1% AEP event (+ 40% allowance for climate change). Run-off up to the 1% annual probability event will be managed within the site extents in line with the NPS. The drainage philosophy seeks to avoid the use of below ground drainage systems to provide biodiversity and water quality benefits, as well as water quantity improvements. Attenuation would largely be through open storage basins with permanent ponds to aid water quality treatment. Linear features (swales) would be used to collect, treat, store and convey water as close to source as possible. These principles are reflected in the Flood Risk Assessment of July 2018 contained in the appendix of the Environmental Statement (6.3). Requirement 13 of the DCO as written does not translate the approach agreed with the LLFA and Somerset Drainage Boards Consortium and instead implies that the drainage will be designed to the less robust standards contained in the Design Manual for Roads and Bridges. This is not consistent with the requirements in the NPS. Requirement 13 of the DCO also does not reflect the need to prioritise the use of sustainable drainage systems (SuDS), as stipulated in Para 5.99 of the NPS.		Amend Requirement 13 of the DCO to reflect the drainage design criteria in the agreed Flood Risk Assessment.	Necessary to ensure that the proposed drainage system complies with Paragraph 5.100 of the NPSNN and the National Standards published by Ministers under Paragraph 5(1) of Schedule 3 to the Flood and Water Management Act 2010.	Amendment to Requirement 13.
LLF2	Detailed Design There will be a need to provide more detail of the various drainage features, ponds and structures as the proposals progress, including cross sections, levels and structures. These details will need to include any temporary or phased arrangements necessary for the construction of the scheme; including how and when these will be brought forward and become operational.		Requirement 13 must be amended to include the need to submit detailed designs of the drainage systems for approval, including the phasing of construction and stages at which the drainage system will become operational.	Necessary to ensure that the proposed drainage system complies with Paragraph 5.100 of the NPSNN and the National Standards published by Ministers under Paragraph 5(1) of Schedule 3 to the Flood and Water Management Act 2010.	Amendment to Requirement 13
LLF3	Maintenance Provision will be required for the adoption and maintenance of any Sustainable Urban Drainage Systems (SUDs). During discussions between the LLFA and HE it was agreed that information on maintenance will be provided at the detailed design stage, however at present it is not considered that the draft DCO includes provision for detailed design matters to be approved by the LLFA.		Requirement 13 should be amended to include the need to provide details of the arrangement to maintain the drainage systems for approval.	This will be important to ensure the drainage system continues to perform as originally designed, for the lifetime of the scheme and to meet the requirements of Paragraph 5.100 of the NPSNN and the National Standards published by Ministers under Paragraph 5(1) of Schedule 3 to the Flood and Water Management Act 2010.	Amendment to Requirement 13 Obligation to secure adoption and maintenance arrangements for any SUDs.

Minerals and Waste						
Summary: - As the Minerals & Waste Planning Authority for Somerset, we have no significant issues with the DCO. We are satisfied with the approach to geology and minerals. In line with adopted the Local Plan, at the implementation stage, further assessment of the mineral resource is encouraged. We are also pleased with the approach to waste prevention, assessment methodology, identified likely effects and proposed mitigations presented by the applicant in the documents reviewed. We have a number of detailed observations, but we do not consider these affect the overall outcome of the assessment. We do not require any further information from the applicant at this stage.						
Ref	Specific Issue	Rating	Summary of Councils proposed mitigation (including link to other representation)	Relevant planning consideration Reference (NPS, Local Policy Guidance, Local Evidence etc)	Add/Amend DCO Requirement/ Obligation (Y/N)	
MW1	The Development Plan		No action required.	N/A	N/A	

	In this part of Somerset, the development plan comprises: • The Somerset Waste Core Strategy (Adopted 2013) http://www.somerset.gov.uk/policies-and-plans/policies/somerset-waste-core-strategy/ • The Somerset Minerals Plan (Adopted 2015) http://www.somerset.gov.uk/policies-and-plans/plans/somerset-minerals-plan/ • The South Somerset Local Plan 2006-2028 (Adopted 2015) https://www.southsomerset.gov.uk/planning-and-building-control/spatial-policy/south-somerset-local-plan-2006-2028/ The County Council have announced that work has commenced on a review of the Waste Core Strategy: http://www.somerset.gov.uk/policies-and-plans/plans/somerset-waste-plan/ South Somerset DC have announced that work has commenced on a review of the https://www.southsomerset.gov.uk/planning-and-building-control/spatial-policy/local-plan-review---issues-and-options-consultation-october-2017/ The policies emerging from these reviews are not part of the development plan and have limited weight because of the early stage that the Local Plan has reached in the adoption process. They do however give an indication of the direction of travel. The Environment Statement refers to the County Council's ongoing review of the Waste Core Strategy - the waste plan review. As part of the work on an updated evidence base, we are currently preparing an updated Waste Need Assessment for a number of waste streams including local authority collected waste (LACW), commercial and industrial (C&I) waste and construction, demolition and excavation (CDE) waste. National guidance requires Waste Planning Authorities to consider Nationally Significant Infrastructure Projects when preparing waste growth forecasts. The detail of the cut and fill balance for this scheme, the estimated volumes of material requiring off site management and scheme timeline are helpful and will inform our current work program, particularly in relation to CDE wastes.				
MW2	Geology and Minerals As a general observation: • Within the adopted Somerset Minerals Plan, Map 8: Minerals Safeguarding Areas shows the geographical extent of safeguarded areas. • Details of the minerals resources to be safeguarded across Somerset are listed in Table 4 of the adopted Somerset Minerals Plan. Further details of the Minerals Safeguarding Areas in the environs of Sparkford can be found in Minerals Topic Paper 6: (January 2014). Map 5 refers to White Lias. • Minerals can only be worked where they occur, and it is important that Somerset's diverse minerals resources are given appropriate protection. • Under planning application Number 12/00198/CPO, in 2012, Somerset County Council granted planning permission to extract Camel Hill Stone (White Lias) from a 1.4ha area at Camel Hill Farm (north of the A303). With regard to specific mitigation measures: • The Minerals Plan approach to safeguarding is NPPF compliant and in line with government advice on this matter. Having noted that the proposed development is		No action required.	N/A	N/A

	an area safeguarded by the adopted Somerset Minerals Plan for its minerals resources, regard should be given to Policy SMP9: Safeguarding and the accompanying Table 6: Exemption list. In line the Policy SMP9, at the implementation stage further assessment of the resource is encouraged, as only with further analysis could the scope for using this material and the potential for prior extraction be revealed. It may become clear that prior extraction is not practicable and/or viable and thus the proposal would be considered “exempt” in Table 6.				
MW3	Waste prevention As a general observation: - We note that waste aspects are discussed in Chapters 9 and 10 of the Environment Statement, summarised alongside other subject matters in Chapter 15 and the Non-Technical Summary. - We are also pleased with Highways England’s commitment to the principles of the waste hierarchy, the approach taken to gather relevant information from national and local sources, the level of detail provided in various documents at this stage of the application and the commitment to working these to full documents once the principal contractor is appointed. - Due to nature and scale of the proposed scheme, the necessary earthworks and potential for waste generation, there is a need for ongoing dialogue between the County Council (as the Mineral and Waste Planning Authority) and Highways England (as the developer) should the proposal proceed to the implementation stage. With regard to specific mitigation measures: Several documents have been submitted in support of the DCO application that relate to material and waste management. We support the commitments made that the following documents (with appropriate monitoring and performance arrangements) to be worked up by the appointed principle contractor: - An outline Environment Management Plan (OEMP) * - An outline Site Waste Management Plan (SWMP) as appendix B.1 to the OEMP - An outline Materials Management Plan (MMP) as appendix B.2 to the OEMP - An outline Soils Management Plan (SMP) as appendix B.3 to the OEMP *to be developed into a full Construction Environmental Management Plan (CEMP) As a suite of documents, these demonstrate that the developer has taken appropriate actions at the planning stage to consider how the scheme design can be developed to optimise resource efficiency and prevent waste, in accordance with the adopted Waste Core Strategy: policies WCS1 WCS2 and WCS4. We do not require any further information from the developer at this stage but look forward to ongoing dialogue as the scheme progresses and full plans are prepared.				
MW4	Waste recycling and reuse				

	The effects of material imports and exports are discussed in chapter 9 and in more detail in chapter 10 of the Environmental Statement. With regard to specific mitigation measures: • The developer has set out to achieve a cut and fill balance for site earthworks to minimise waste generation and identifies the potential for surplus soils to be used elsewhere in the scheme subject to testing. This approach is strongly supported by the Waste Planning Authority. • The details contained within the SWMP are considered appropriate for the scale and nature of the proposed scheme and in accordance with the adopted Waste Core Strategy: Policy WCS2: Recycling & Reuse.				
MW5	Baseline data and assessment outcomes Baseline conditions are discussed in section 10.7 of the Environmental Statement, including material resources, generation and management of wastes. The developer has used national and local datasets including the Somerset Local Aggregate Assessment - 4th edition and Environment Agency waste management data for 2016 and the Somerset County Council 2016 Annual Monitoring Report. With regard to specific mitigation measures: • We trust that previous observations on the data presented in the baseline section and a third related to data within the SWMP have been taken on board (referenced within the Statement of Common Ground) • Whilst we do not feel that these observations affect the overall outcome of the assessment methodology for significant effects, we trust it may be helpful to clarify each matter at this stage to aid future development of the CEMP and associated appendices, in particular the SWMP. • We are satisfied with the assessment conclusions. We do not require any additional information or actions from the developer at this stage, other than those committed to in the application and supporting documents (as specified in para xx above).				
MW6	Continuing engagement Following the announcement of the preferred route in October 2017, there has been ongoing engagement between the Waste Planning Authority and Highways England, specifically through the format of the Environmental Technical Working Group (TWG). With regard to specific mitigation measures: • We trust that the additional local sources of information issued to Highways England may be of assistance to the developer in terms of developing specific local mitigation strategies - in particular, the inert waste topic paper published in 2015.				

Built Heritage

In summary, the construction and operation of the proposed dualling of the A303 has the potential to result in adverse impacts on heritage assets in South Somerset, particularly Hazlegrove Registered Park (RPG) and Garden where 14% of the RPG will be lost permanently. The District Council considers that Highways England has sought to design a scheme that minimises land take from the RPG, to avoid known archaeological sites and limit the impact on historic buildings and areas. The assessment of effects set out in the Environmental Statement is supported with the exception for a small number of heritage assets which have either been overlooked or the judgement of heritage value or magnitude of impact is challenged. The District Council seeks in these cases, a reassessment of the effects of the proposal on the heritage asset and sufficient mitigation to be secured through

the DCO for these effects, including a requirement for consultation with the District Council on matters relevant to its functions at the detailed design stage. Specific details of the mitigation considered necessary to conserve, protect or enhance assets for future generations are set out below.

Please see Appendix 1: Cultural Heritage Topic Paper for detailed information regarding local impacts

Ref	Specific Issue	Rating	Summary of Council's proposed mitigation (including link to other representation)	Relevant Planning Consideration Reference (NPS, Local Policy, Guidance, Local Evidence etc.)	Add/Amend DCO Requirement/Obligation (Y/N)
BH1	Camel Hill Farm and Outlying Farmsteads The value/sensitivity of Camel Hill Farm and outlying farmsteads is identified as being 'Low', in line with being an undesignated local heritage asset, but could rise to 'Medium' if it were found to be historically associated with the neighbouring Hazlegrove House estate. This would escalate the significance of effects for the construction impacts.		The Council requires the applicant to obtain further information on the association between the Hazlegrove House estate and Camel Hill Farm and outlying historical farmsteads to ensure an adequate understanding of the historical significance of the outlying historic buildings to the Hazlegrove House estate. Any resulting increase in heritage value of these assets should be included in the Cultural Heritage DBA and those with significant effects taken through to the Cultural Heritage ES with appropriate design, mitigation and enhancement measures included following consultation with the District Council.	Paragraph 5.125 of the NPS requires the Secretary of State to consider the impacts on non-designated heritage assets on the basis of clear evidence that the assets have a significance that merits consideration. Paragraphs 5.126 of the NPS requires the applicant to assess the significant heritage impacts of the proposed project. Paragraph 5.127 of the NPS requires the applicant to describe the significance of any heritage assets affected. Paragraph 4.20 of the NPS allows the Secretary of State to attach planning requirements for unresolved details. South Somerset Local Plan (2006-2028): Policy EQ3 (Historic Environment) requires heritage assets to be conserved and where appropriate enhanced for their historic significance and important contribution to local distinctiveness, character and sense of place.	Unclear - mitigation may be required and therefore a new Requirement may be sought for inclusion in the DCO, additional evidence from the applicant is required before this can be established by the District Council – see draft SoCG. The special protection for listed buildings is necessary and provisions for their protection should be included within the DCO. Such provisions might include a scheme to be approved by the Secretary of State and upon which the LPA is consulted which provides this protection prior to [a specified event/commencement of the development/the carrying out of any works which affect any listed building] The detailed amendments should be considered as part of the redrafting of the DCO.
BH2	W Sparrow Road Gullies Two 'W SPARROW LTD MARTOCK' stamped cast iron gullies survive at Camel Cross.		These undesignated heritage assets should be included in the Cultural Heritage DBA and an appropriate measure of mitigation included in the Cultural Heritage ES. A planning Requirement for the careful removal of the gully grates and	Paragraph 5.125 of the NPS requires the Secretary of State to consider the impacts on non-designated heritage assets on the basis of clear evidence that the assets have a significance that merits consideration. Paragraphs 5.126 of the NPS requires the applicant to assess the significant heritage impacts of the proposed project.	Yes – a new Requirement is sought for inclusion in the DCO.

Ref	Specific Issue	Rating	Summary of Council's proposed mitigation (including link to other representation)	Relevant Planning Consideration Reference (NPS, Local Policy, Guidance, Local Evidence etc.)	Add/Amend DCO Requirement/Obligation (Y/N)
			frames and their offer for accessioning to the museum collections of the South West Heritage Trust or other appropriate local museum, is sought in the DCO.	Paragraph 4.20 of the NPS allows the Secretary of State to attach planning requirements for unresolved details. South Somerset Local Plan (2006-2028): Policy EQ3 (Historic Environment) requires heritage assets to be conserved and where appropriate enhanced for their historic significance and important contribution to local distinctiveness, character and sense of place.	
BH3	Howell Hill Stone Boundary Wall A Camel Stone boundary wall exists on the east side of Howell Hill. This is a locally distinctive feature of heritage and landscape value.		The boundary wall should be retained through either its repair or retention on its current alignment or its rebuilding on the alignment of the revised boundary to the Howell Hill carriageway. This is sought in the detailed design of the scheme.	Paragraph 4.20 of the NPS allows the Secretary of State to attach planning requirements for unresolved details. South Somerset Local Plan (2006-2028): Policy EQ2 (General Development) requires "development to be designed to achieve a high quality, which . . . preserves or enhances the character and appearance of the district". Developments will be considered against, inter alia, conserving and enhancing the landscape character of the area.	Yes – an amendment to Requirement 5 (Landscaping) of the DCO is sought to include specific reference to the issue. Requirement 12 (Detailed Design) doesn't need to be amended but the details/plans to which the development is subject might need to be updated as necessary.
BH4	Pre-Worboys 'Cross Roads' Warning Sign A pre-Worboys 'Cross Roads' highway warning sign survives outside of The Gables in Podimore.		This is an undesignated highway heritage asset and should be included for assessment in the Cultural Heritage DBA Its inclusion on the register of sensitive environmental features in the CEMP under Planning Requirement 3 of the DCO is sought to raise awareness of this vulnerable roadside heritage asset to construction site personnel and avoid accidental damage.	Paragraph 4.20 of the NPS allows the Secretary of State to attach planning requirements for unresolved details. South Somerset Local Plan (2006-2028): Policy EQ3 (Historic Environment) requires heritage assets to be conserved and where appropriate enhanced for their historic significance and important contribution to local distinctiveness, character and sense of place.	Yes – amendments are sought to Requirement 3 (Construction Environmental Management Plan) of the DCO.
BH5	Turnpike Road (MM103) The heritage value, magnitude of impact and significance of effects for MM103 (the Martock to Sparkford Turnpike Road) requires reassessment.		The Council require the applicant to reassess heritage asset MM103 with any resulting increase in the significance of effects included in the Cultural Heritage ES with appropriate design, mitigation and	Paragraph 5.125 of the NPS requires the Secretary of State to consider the impacts on non-designated heritage assets on the basis of clear evidence that the assets have a significance that merits consideration. Paragraphs 5.126 of the NPS requires the applicant to assess the significant heritage impacts of the proposed project.	Unclear - mitigation may be required and therefore a new Requirement may be sought for inclusion in the DCO, additional evidence from the applicant is required before this can be

Ref	Specific Issue	Rating	Summary of Council's proposed mitigation (including link to other representation)	Relevant Planning Consideration Reference (NPS, Local Policy, Guidance, Local Evidence etc.)	Add/Amend DCO Requirement/ Obligation (Y/N)
			enhancement measures included following consultation with the District Council. Mitigation might include markers, information points or public art at intervals along the historic alignment of the Turnpike road (where it would no longer form the operational A303) to retain evidence of its historic route.	Paragraph 5.127 of the NPS requires the applicant to describe the significance of any heritage assets affected. South Somerset Local Plan (2006-2028): Policy EQ3 (Historic Environment) requires heritage assets to be conserved. All new development proposals relating to the historic environment will be expected to safeguard the significance of heritage assets.	established by the District Council – see draft SoCG.
BH6	Canegore Corner Listed Milestone (MM30) The magnitude of impact for MM30 is judged to be 'Moderate' despite the listed milestone being permanently removed from its location and its setting and relationship with the A303 being fundamentally altered on its relocation; which has yet to be identified. A greater magnitude of impact is considered appropriate.		The Council are seeking the inclusion of MM30 on the register of sensitive environmental features, and full details for its safe removal and storage in the CEMP under Planning Requirement 3 of the DCO. The applicant is required to identify a position for the relocation of MM30, approved by the Secretary of State in consultation with the local planning and highway authorities, in the detailed design of the scheme.	Paragraphs 5.126 of the NPS requires the applicant to assess the significant heritage impacts of the proposed project. Paragraph 4.20 of the NPS allows the Secretary of State to attach planning requirements for unresolved details. South Somerset Local Plan (2006-2028): Policy EQ3 (Historic Environment) requires heritage assets to be conserved. All new development proposals relating to the historic environment will be expected to safeguard the significance of heritage assets.	Yes – an amendment is sought to Requirement 3 (Construction Environmental Management Plan) of the DCO. Requirement 12 (Detailed Design) doesn't need to be amended but the details/plans to which the development is subject might need to be updated as necessary.
BH7	B3151 Listed milestone (MM13) Whilst it is agreed that the magnitude of impact for MM13 is negligible, the milestone is on the edge of the scheme and could be accidentally damaged if it is not identified and protected (the milestone is heavily covered in ivy and embedded in the hedge).		The Council would like MM13 to be included on the register of sensitive environmental features and full details for its protection during the construction works in the CEMP under Planning Requirement 3 of the DCO.	Paragraph 4.20 of the NPS allows the Secretary of State to attach planning requirements for unresolved details. South Somerset Local Plan (2006-2028): Policy EQ3 (Historic Environment) requires heritage assets to be conserved. All new development proposals relating to the historic environment will be expected to safeguard the significance of heritage assets.	Yes – amendments are sought to Requirement 3 (Construction Environmental Management Plan) the DCO.
BH8	Bakery (MM273) The magnitude of impact for asset MM273 is judged to be 'Moderate', a greater magnitude of impact is considered appropriate given that the realignment of the A303 will remove the		The Council requires the applicant to reconsider the magnitude of impact, with	Paragraph 5.125 of the NPS requires the Secretary of State to consider the impacts on non-designated	Yes a new Requirement should be included in the

Ref	Specific Issue	Rating	Summary of Council's proposed mitigation (including link to other representation)	Relevant Planning Consideration Reference (NPS, Local Policy, Guidance, Local Evidence etc.)	Add/Amend DCO Requirement/Obligation (Y/N)
	Bakery's location alongside a main through-route, thus fundamentally alter its relationship with its setting and threaten its historic use.		any resulting increase in the significance of effects included in the Cultural Heritage ES with appropriate design, mitigation and enhancement measures included following consultation with the District Council.	heritage assets on the basis of clear evidence that the assets have a significance that merits consideration. Paragraphs 5.126 of the NPS requires the applicant to assess the significant heritage impacts of the proposed project. South Somerset Local Plan (2006-2028): Policy EQ3 (Historic Environment) requires heritage assets to be conserved. All new development proposals relating to the historic environment will be expected to safeguard the significance of heritage assets.	DCO which addresses signage requirements.
BH9	Group Assessments Paragraph 2.1.1 of the Cultural Heritage DBA: Adjacent heritage assets are assessed within a common group and assigned a 'GR' reference. This works well for heritage assets of the same value/sensitivity, or where the Group value/sensitivity is equal to the highest individual asset in the group but it is potentially misleading in relation to individual buildings in a group where assets of 'High' value/sensitivity are part of a lower valued group. GR06 (Podimore), GR07 (Queen Camel Conservation Area) and GR08 (West Camel Conservation Area) are examples. These historic settlements are assigned 'Medium' value/sensitivity but include Grade I and II* listed buildings that would normally be considered to have a 'High' value/sensitivity. The assessment of the significance of effects for these 'High' value/sensitivity is therefore downgraded, and the assessment could mask a significant effect on a heritage asset both during construction of the scheme and during operation once constructed, that is not taken forward for further consideration.		The Council requires the applicant to reassess assets of higher value/sensitivity in a Group individually, with any resulting increase in the significance of effects included in the Cultural Heritage ES with appropriate design, mitigation and enhancement measures included following consultation with the District Council.	Paragraphs 5.126 of the NPS requires the applicant to assess the significant heritage impacts of the proposed project. Paragraph 5.131 of the NPS requires the Secretary of State to give great weight to the conservation of a designated heritage asset. South Somerset Local Plan (2006-2028): Policy EQ3 (Historic Environment) requires heritage assets to be conserved. All new development proposals relating to the historic environment will be expected to safeguard the significance of heritage assets.	Unclear - mitigation may be required and therefore a new Requirement may be sought for inclusion in the DCO, additional evidence from the applicant is required before this can be established by the District Council – see draft SoCG.
BH10	Impact of Potential Traffic Calming on the Conservation Area The Council is concerned about increased traffic on local roads including Sparkford High Street and West Camel during the construction phases and once the new A303 is operational (see Somerset County Council LIR issue Ref. TA4, TA9 and TA10). There is no reference in the Cultural Heritage DBA operational impact schedule of the potential increase in traffic passing through these villages and local Conservation Areas or by roadside Listed Buildings. Whilst an increase in vehicle flow can generate its own potential impacts, any proposed mitigation by way of an introduction of traffic calming measures (that the Council are seeking elsewhere through the DCO) in response to increased vehicle flow can also bring about an adverse impact on the character and appearance of a Conservation Area and setting of a Listed Building/s, i.e. highway lighting, signage, lining, bollards and build-out.		The applicant should then identify the impacts of increased traffic, both at construction and operational phases and impacts of any associated traffic calming measures and increased traffic-induced vibration on heritage assets and include an appropriate measure of mitigation in the Cultural Heritage ES. Inclusion of any associated traffic calming measures should be secured in the detailed design of the scheme.	Paragraphs 5.126 of the NPS requires the applicant to assess the significant heritage impacts of the proposed project. Paragraph 5.131 of the NPS requires the Secretary of State to give great weight to the conservation of a designated heritage asset. South Somerset Local Plan (2006-2028): Policy EQ3 (Historic Environment) requires heritage assets to be conserved. All new development proposals relating to the historic environment will be expected to safeguard the significance of heritage assets.	Inclusion of any associated traffic calming measures requires a mechanism to be agreed which secures this traffic calming.

Ref	Specific Issue	Rating	Summary of Council's proposed mitigation (including link to other representation)	Relevant Planning Consideration Reference (NPS, Local Policy, Guidance, Local Evidence etc.)	Add/Amend DCO Requirement/ Obligation (Y/N)
BH11	Hazlegrove Lane The Hazelgrove House RPG Statement of Significance does not cover the remnants of the lost Hazlegrove Lane in the south-east field of the RPG (Peaked Close) and the proposed landscape scheme does not retain the route or extant features of the former Lane.		The applicant is required to reassess the former route of Hazlegrove Lane in the Hazelgrove House RPG Statement of Significance, DBA and ES. Retention of the extant features and alignment of the former Hazlegrove Lane is sought in the detailed design scheme under the DCO and the landscaping scheme approved under Planning Requirement 5 of the DCO. Retention of the PRoW on its historic alignment is sought where feasible.	Paragraphs 5.126 of the NPS requires the applicant to assess the significant heritage impacts of the proposed project. Paragraph 5.127 of the NPS requires the applicant to describe the significance of any heritage assets affected. Paragraph 5.131 of the NPS requires the Secretary of State to give great weight to the conservation of a designated heritage asset. Paragraph 4.20 of the NPS allows the Secretary of State to attach planning requirements for unresolved details. South Somerset Local Plan (2006-2028): Policy EQ3 (Historic Environment) requires heritage assets to be conserved. All new development proposals relating to the historic environment will be expected to safeguard the significance of heritage assets.	Yes – amendments are sought to Requirement 5 (Landscaping) of the DCO.
BH12	Hazlegrove House RPG Coppiced-Banked Track The Hazelgrove House RPG Statement of Significance does not cover the coppiced bank and ditch feature on the eastern boundary of the RPG. The feature will be foreshortened by the realignment of the A303 and associated cutting and screen planting works.		The Council requires the applicant to assess the bank and ditch feature in the Hazelgrove House RPG Statement of Significance and these features should be taken through to the DBA and ES with appropriate design, mitigation and enhancement measures included following consultation with the District Council.	Paragraphs 5.126 of the NPS requires the applicant to assess the significant heritage impacts of the proposed project. Paragraph 5.127 of the NPS requires the applicant to describe the significance of any heritage assets affected. Paragraph 5.131 of the NPS requires the Secretary of State to give great weight to the conservation of a designated heritage asset. South Somerset Local Plan (2006-2028): Policy EQ3 (Historic Environment) requires heritage assets to be conserved. All new development proposals relating to the historic environment will be expected to safeguard the significance of heritage assets.	Unclear - mitigation may be required and therefore a new Requirement may be sought for inclusion in the DCO, additional evidence from the applicant is required before this can be established by the District Council – see draft SoCG.
BH13	Pond 5 Rawlins's Close is a field which retains the majority of its historical boundaries and three veteran parkland trees. It will be affected by the scheme and so mitigation is offered which reinstates the parkland but this is compromised by the inclusion of Pond 5. The pond is a considerable size and is accompanied by fencing, a maintenance track and other works. Its location in Rawlins's Close would further diminish the area of the historic parkland and introduce an alien feature into the RPG.		The applicant should relocate Pond 5 outside of the RPG in the detailed design scheme.	Paragraph 5.131 of the NPS requires the Secretary of State to give great weight to the conservation of a designated heritage asset. Paragraph 4.20 of the NPS allows the Secretary of State to attach planning requirements for unresolved details.	Yes – amendments are sought to Requirement 5 (Landscaping) of the DCO.

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				South Somerset Local Plan (2006-2028): Policy EQ3 (Historic Environment) requires heritage assets to be conserved. All new development proposals relating to the historic environment will be expected to safeguard the significance and character of heritage assets.	
BH14	Veteran Trees in Rawlins's Close The proposals for the three veteran trees is unclear as only one appears on the Environmental Masterplan. Furthermore, this area is proposed as an auxiliary compound and topsoil and materials storage area, but there is no reference to retaining and protecting the veteran trees.		The Council requires the retention and protection of the three veteran trees, therefore they should be included on the register of sensitive environmental features in the CEMP under Planning Requirement 3 of the DCO and retained in the landscaping scheme under Planning Requirement 5 of the DCO.	Paragraph 5.131 of the NPS requires the Secretary of State to give great weight to the conservation of a designated heritage asset. Paragraph 4.20 of the NPS allows the Secretary of State to attach planning requirements for unresolved details. South Somerset Local Plan (2006-2028): Policy EQ3 (Historic Environment) requires heritage assets to be conserved. All new development proposals relating to the historic environment will be expected to safeguard the significance of heritage assets.	Yes – amendments are sought to Requirement 3 (Construction Environmental Management Plan) and Requirement 5 (Landscaping) of the DCO.
BH15	Highway Lighting for Hazlegrove Junction It is assumed that the highway lights on the Hazlegrove Junction will be LED, the blue-white glare of LED is likely to be intrusive to the southern end of the RPG when the lamps are on.		The Council requires the siting of highway lighting columns on the north side of the roads so far as feasible and the use of lantern shields/hoods to prevent light glare intrusion into the RPG.	Paragraph 5.160 of the NPS requires careful consideration of materials and design for infrastructure.	Yes – an amendment is required to Regulation 15 (Highway Lighting) to clarify that SSDC is the “relevant planning authority” for consultation.
BH16	Bunds 6 and 7 Bunds 6 and 7 are not sufficiently high to screen HGVs, signage and lighting columns and will likely affect the character of the RPG. An environmental barrier with planting is proposed to screen the far south-east corner of the RPG. This is an important point in the RPG boundary as it aligns with the outward approach on the Hazlegrove drive. An environmental barrier in this prominent position would diminish the character and appearance of the RPG.		The applicant should increase the height of Bund 6 and extend Bund 7, as a substitute to the proposed environmental barrier, in the detailed design of the scheme.	Paragraph 5.131 of the NPS requires the Secretary of State to give great weight to the conservation of a designated heritage asset. Paragraph 4.20 of the NPS allows the Secretary of State to attach planning requirements for unresolved details. South Somerset Local Plan (2006-2028): Policy EQ3 (Historic Environment) requires heritage assets to be conserved. All new development proposals relating to the historic environment will be expected to safeguard the character of heritage assets.	Yes – an amendment to Requirement 5 (Landscaping) of the DCO is sought to include specific reference to the issue. Requirement 12 (Detailed Design) doesn't need to be amended but the details/plans to which the development is subject might need to be updated as necessary.
BH17	Hazlegrove House RPG Driveway Realignment The realignment does not respond to the landform and proximity of parkland features, such as the retained southern copse. It also passes close to the existing pond and a veteran tree and will require extensive groundworks.		The applicant should redesign the new alignment for the Hazlegrove House drive in the detailed design of the scheme.	Paragraph 5.131 of the NPS requires the Secretary of State to give great weight to the conservation of a designated heritage asset. Paragraph 4.20 of the NPS allows the Secretary of State to attach planning requirements for unresolved details.	Yes, an amendment to Requirement 5 (Landscaping) of the DCO is sought to include specific reference to the issue.

Ref	Specific Issue	Rating	Summary of Council's proposed mitigation (including link to other representation)	Relevant Planning Consideration Reference (NPS, Local Policy, Guidance, Local Evidence etc.)	Add/Amend DCO Requirement/Obligation (Y/N)
				South Somerset Local Plan (2006-2028): Policy EQ3 (Historic Environment) requires heritage assets to be conserved. All new development proposals relating to the historic environment will be expected to safeguard the character of heritage assets.	Requirement 12 (Detailed Design) doesn't need to be amended but the details/plans to which the development is subject might need to be updated as necessary.
BH18	Hazlegrove House RPG Restoration and Conservation Management Plans The Cultural Heritage ES identifies the design and mitigation measures proposed in response to the adverse effects on the Hazlegrove House RPG. These measures respond to individual issues but do not address the overall harm to the RPG from the permanent loss of approximately 14% of the RPG and further encroachment of the A303. Part of the mitigation includes for the reinstatement of parkland grazed grass land and specimen tree planting in the area which is currently arable farmland. However, the DCO does not include a historic landscape conservation management plan for this area or the remainder of the RPG. A conservation management plan for the whole RPG would help mitigate the permanent harm to the RPG.		The Council requires a planning requirement in the DCO for the preparation and implementation of a conservation management plan for the RPG approved by Secretary of State in consultation with the local planning authority.	Paragraph 5.131 of the NPS requires the Secretary of State to give great weight to the conservation of a designated heritage asset. Paragraph 4.20 of the NPS allows the Secretary of State to attach planning requirements for unresolved details. South Somerset Adopted Local Plan (2006-2028): Policy EQ3 (Historic Environment) requires heritage assets to be conserved. All new development proposals relating to the historic environment will be expected to safeguard the significance and character of heritage assets.	Yes – a new Requirement is required in the DCO.

Landscape					
In summary, the proposed dualling of the A303 has the potential to result in adverse effects on landscape character and visual amenity. In general the District Council agrees with the assessment undertaken by Highways England and the proposed mitigation works which have been carefully considered to counter local effects, however, the District Council disagrees with the conclusions made for five sensitive receptors and therefore seeks further mitigation for these. The District Council would like the applicant to reassess the effect of the proposal on these receptors and specific details of the mitigation considered necessary to avoid or minimise harm to landscape character, views and visual amenity are set out below. Please see Appendix 2: Landscape Topic Paper for detailed information regarding local impacts					
Ref	Specific Issue	Rating	Summary of Council's proposed mitigation (including link to other representation)	Relevant Planning Consideration Reference (NPS, Local Policy, Guidance, Local Evidence etc.)	Add/Amend DCO Requirement/Obligation (Y/N)
L1	Visual Receptors Nos. 14 and 17 (Green track of Slate Lane) The scheme will bring the Steart Hill Link and Downhead Junction Link roads in close proximity to Slate Lane and introduce an extensive belt of screen planting in the foreground. This linear belt of planting will not only screen the realigned A303 and its link roads but also remove all opportunities to appreciate the long distance views of the vast undulating landscape to the south. This permanent effect is not assessed in the impact schedules. For VR No. 14 there is no assessment on the effects on the vast, long distance view for the 15-year period once the extensive screen planting is established. For VR No. 17 there is no assessment of the long distance views during operation.		The Council requires the reassessment of VR No. 14 and VR No. 17 with an assessment of the effects from the loss of the vast, long distance view for the 15-year period. The inclusion of measures for retaining long distance panoramic views from Slate Lane in the detailed design of the scheme is sought.	Paragraph 4.20 of the NPS allows the Secretary of State to attach planning requirements for unresolved details. Paragraph 5.145 of the NPS requires the assessment to include any significant effects on landscape character. Paragraph 5.146 of the NPS requires the assessment to include potential impacts on views and visual amenity. South Somerset Local Plan (2006-2028): Policy EQ2 (General Development) requires “development to be designed to achieve a high quality, which . . . preserves or enhances the character and appearance of the district”. Developments will be considered against, inter	Yes, an amendment to Requirement 5 (Landscaping) of the DCO is sought to include specific reference to the issue. Requirement 12 (Detailed Design) doesn't need to be amended but the details/plans to which the development is subject might need to be updated as necessary.

Ref	Specific Issue	Rating	Summary of Council's proposed mitigation (including link to other representation)	Relevant Planning Consideration Reference (NPS, Local Policy, Guidance, Local Evidence etc.)	Add/Amend DCO Requirement/Obligation (Y/N)
				alia, conserving and enhancing the landscape character of the area.	
L2	Visual Receptor No. 25 The assessment of the effect on VR No. 25 is challenged as the boundary hedge to the A303 is visible on the horizon, as are HGVs and vans above the hedgerow.		The applicant should reassess VR No. 25 and include measures for enhanced screening of the A303 from Wales in the detailed design of the scheme.	Paragraph 5.146 of the NPS requires the assessment to include potential impacts on views and visual amenity. Paragraph 5.149 of the NPS requires projects to be designed carefully, taking account of the potential impact on the landscape. Paragraph 4.20 of the NPS allows the Secretary of State to attach planning requirements for unresolved details. South Somerset Local Plan (2006-2028): Policy EQ2 (General Development) requires "development to be designed to achieve a high quality, which . . . preserves or enhances the character and appearance of the district". Developments will be considered against, inter alia, conserving and enhancing the landscape character of the area.	Yes, an amendment to Requirement 5 (Landscaping) of the DCO is sought to include specific reference to the issue. Requirement 12 (Detailed Design) doesn't need to be amended but the details/plans to which the development is subject might need to be updated as necessary.
L3	Visual Receptor No. 27 & 28 The assessment of VR No.27 & No. 28 does not consider the harmful effect of an environmental barrier on the rural character of the farmstead setting.		The applicant is asked to reassess VR No. 27 & No.28 with consideration of the effects of an environmental barrier on the rural character and the inclusion of a bund instead of an environmental barrier in the detailed design of the scheme.	Paragraph 5.145 of the NPS requires the assessment to include any significant effects on landscape character. Paragraph 5.149 of the NPS requires projects to be designed carefully, taking account of the potential impact on the landscape. Paragraph 4.20 of the NPS allows the Secretary of State to attach planning requirements for unresolved details. South Somerset Local Plan (2006-2028): Policy EQ2 (General Development) requires "development to be designed to achieve a high quality, which . . . preserves or enhances the character and appearance of the district". Developments will be considered against, inter alia, conserving and enhancing the landscape character of the area. South Somerset Adopted Local Plan (2006-2028): Policy EQ3 (Historic Environment) requires heritage assets to be conserved. All new development proposals relating to the historic environment will be expected to safeguard the setting of heritage assets.	Yes, an amendment to Requirement 5 (Landscaping) of the DCO is sought to include specific reference to the issue. Requirement 12 (Detailed Design) doesn't need to be amended but the details/plans to which the development is subject might need to be updated as necessary.
L4	Visual Receptor No. 38 The assessment of the effects on VR No. 38 are challenged as it does not consider the adverse effect of an environmental barrier on the character of the RPG.		The applicant is required to reassess VR No. 38 and extend Bund 7, as a	Paragraph 5.145 of the NPS requires the assessment to include any significant effects on landscape character.	Yes, an amendment to Requirement 5 (Landscaping) of the

Ref	Specific Issue	Rating	Summary of Council's proposed mitigation (including link to other representation)	Relevant Planning Consideration Reference (NPS, Local Policy, Guidance, Local Evidence etc.)	Add/Amend DCO Requirement/Obligation (Y/N)
			substitute for the proposed environmental barrier, in the detailed design of the scheme.	Paragraph 5.146 of the NPS requires the assessment to include potential impacts on views and visual amenity. Paragraph 5.149 of the NPS requires projects to be designed carefully, taking account of the potential impact on the landscape. Paragraph 4.20 of the NPS allows the Secretary of State to attach planning requirements for unresolved details. South Somerset Local Plan (2006-2028): Policy EQ3 (Historic Environment) required heritage assets to be conserved. All new development proposals relating to the historic environment will be expected to safeguard the character of heritage assets.	DCO is sought to include specific reference to the issue. Requirement 12 (Detailed Design) doesn't need to be amended but the details/plans to which the development is subject might need to be updated as necessary.
L5	Design of Highway and Landscape Elements There is no detail for the design and materials for the highway and landscape features are required, i.e. the acoustic barriers, fences, gates, access road and track surfaces.		The Council requires the inclusion of details for hard landscaping works in the landscaping scheme approved under Planning Requirement 5 of the DCO.	Paragraph 5.149 of the NPS requires projects to be designed carefully, taking account of the potential impact on the landscape. Paragraph 5.160 of the NPS requires careful consideration of materials and design for infrastructure. Paragraph 4.20 of the NPS allows the Secretary of State to attach planning requirements for unresolved details.	Yes, an amendment to Requirement 5 (Landscaping) of the DCO is sought to include specific reference to the issue.
L6	Bridge Designs The proposed overbridge and underbridge for the scheme vary in form from the existing bridges on this section of the A303 by being supported on abutments rather than slender piers. This introduces a new form of bridge design with substantial elements of concrete facing panels.		The Council would like the applicant to consider the redesign of the bridges with a response to the character of the local landscape or road corridor in the detailed design of the scheme.	Paragraph 5.149 of the NPS requires projects to be designed carefully, taking account of the potential impact on the landscape. Paragraph 5.160 of the NPS requires careful consideration of materials and design for infrastructure. Paragraph 4.20 of the NPS allows the Secretary of State to attach planning requirements for unresolved details. South Somerset Local Plan (2006-2028): Policy EQ2 (General Development) requires "development to be designed to achieve a high quality, which promotes South Somerset's local distinctiveness and preserves or enhances the character and appearance of the district".	Yes – amendments are sought to the Preliminary Scheme Design.

Biodiversity

Highways England has considered the likely significant effects of the proposal on important ecological resources including designated sites, habitats and species and in their opinion have sought to design the proposed dualling scheme to avoid and minimise habitat loss in the long term. The District Council is however concerned about the potential impacts of the scheme both over the construction period and during the operation of the new A303 on habitat loss, tree coverage (loss and replacement), Bat survey and mitigation and species mortality. It considers that further surveys, analysis and assessment is required to clearly understand these likely significant effects and consultation with the District Council's consultant ecologist prior to undertaking this further work is strongly encouraged. The Council also believes that the mitigation currently proposed is not sufficient to avoid

significant harm to biodiversity interests and further mitigation is sought, details of much of this mitigation is currently unclear and therefore it is crucial that the DCO includes a requirement for the applicant to consult with the District Council on detailed scheme design matters.

Please see Appendix 3: Biodiversity Topic Paper for detailed information regarding local impacts

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B1	Evidence of sufficient biodiversity mitigation / enhancement being provided It is considered that the applicant has provided insufficient evidence to show that the scheme would not result in a net loss of habitat value.		The Council would like the applicant to use Defra's Biodiversity offsetting metric or Somerset's Habitats Evaluation Procedure to calculate the equivalent amount of habitat needed to replace that lost during construction. There is a lack of visibility as to what habitats are being lost and gained. Additional information would give confidence that the landscaping associated with the proposed road scheme provides sufficient mitigation. Where mitigation is insufficient the appropriate amount and type should be added to the scheme either on or off site. Furthermore, the scheme should show a resultant enhancement for biodiversity including through habitat creation. The Environmental Statement should be updated accordingly.	Paragraph 5.25 of the NPS allows the applicant to consider biodiversity offsetting to counteract any impacts on biodiversity which cannot be avoided or mitigated. Paragraph 5.20 of the NPS explains that 'Government policy for the natural environment is set out in the Natural Environment White Paper (NEWP). The NEWP sets out a vision of moving progressively from net biodiversity loss to net gain.' This has been taken forward in the more recent National Planning Policy Framework 2018 (NPPF) of which paragraph 170 states: 'Planning... decisions should contribute to and enhance the natural and local environment by... minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures'. South Somerset Local Plan Policy EQ4 (Biodiversity) states that 'All proposals for development... will: Maximise opportunities for... enhancement and connection of natural habitats...'	Unclear - mitigation may be required and therefore a new Requirement may be sought for inclusion in the DCO, additional evidence from the applicant is required before this can be established by the District Council – see draft SoCG.
B2	Habitat loss/replacement - Trees In addition to point B1 above, the loss of trees, including veteran trees and hedges is particularly concerning to the District Council. South Somerset has very low tree cover (just 4%) in comparison with the English county average (12%).		The loss of trees, including veteran trees and hedges is concerning and the Council considers that insufficient tree replanting is proposed. It is our	Paragraph 5.25 of the NPS allows the applicant to consider biodiversity offsetting to counteract any impacts on biodiversity which cannot be avoided or mitigated.	Requirement 5 (Landscaping) doesn't need to be amended but the details/plans to which the development is

Ref	Specific Issue	Rating	Summary of Council's proposed mitigation (including link to other representation)	Relevant Planning Consideration Reference (NPS, Local Policy, Guidance, Local Evidence etc.)	Add/Amend DCO Requirement/ Obligation (Y/N)
			understanding that the replanting and replacement of mature trees is on a 1 for 1 basis, this is insufficient and at least three trees should be replanted for each tree lost to achieve net gain and to account for natural losses. This should be amended by the applicant and specified in an updated landscape strategy/plan approved under Planning Requirement 5 of the DCO.	Paragraph 5.20 of the NPS explains that 'Government policy for the natural environment is set out in the Natural Environment White Paper (NEWP). The NEWP sets out a vision of moving progressively from net biodiversity loss to net gain.' This has been taken forward in the more recent National Planning Policy Framework 2018 (NPPF) of which paragraph 170 states: 'Planning... decisions should contribute to and enhance the natural and local environment by... minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures'. South Somerset Local Plan Policy EQ6 (Woodland and Forests) states 'Woodland areas, including ancient and semi-natural woodland should be... expanded where possible to provide a buffer to core areas of woodland' Targets for the policy include a net increase in area.	subject might need to be updated as necessary.
B3	Effects on bats and their foraging habitats There is insufficient survey work inside and on the edge of existing woodlands and the analysis of the available survey work lacks detail. The proposed mitigation is considered to be insufficient and requires further consideration following the recommended additional surveying.		The applicant is required to clarify the results of the survey work in the Environmental Statement to provide a clearer picture of where and what each species is doing along the route of the proposed dualling. The impacts on each species' local population should then be considered and analysed and mitigation measures provided accordingly. Further bat activity surveys of woodland affected by the proposed scheme needs to be carried out, reported and analysed in an updated Environmental Statement and mitigation proposed accordingly. As in point B1 above, the value of the habitat area lost should be calculated using either Somerset's	The NPS recognises in Paragraph 5.34 that many individual wildlife species receive statutory protection under a range of legislative provisions. With regard to bats this includes the Conservation of Habitats and Species Regulations 2017 regarding European protected species of which Regulation 43 makes it an offence to deliberately disturb wild animals, listed on Schedule 2, in such a way as to be likely to: a) impair their ability— (i) to survive, to breed or reproduce, or to rear or nurture their young; or (ii) in the case of animals of a hibernating or migratory species, to hibernate or migrate; or (b) <u>affect significantly the local distribution or abundance of the species to which they belong</u> Section 99 of the Government circular 2005/06 on biodiversity and geological conservation states that '<i>It is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision.</i>'	Yes a new Requirement should be included in the DCO which addresses signage requirements.

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			Habitat Evaluation Procedure or Defra's Biodiversity offsetting metric and mitigation provided accordingly.	Paragraph 5.20 of the NPS mentions that 'Government policy for the natural environment is set out in the Natural Environment White Paper (NEWP). The NEWP sets out a vision of moving progressively from net biodiversity loss to net gain.' This has been taken forward in the more recent National Planning Policy Framework 2018 (NPPF) of which paragraph 170 states: 'Planning... decisions should contribute to and enhance the natural and local environment by... minimising impacts on and providing net gains for biodiversity...' South Somerset Local Plan policy EQ4 (Biodiversity) states that 'All proposals for development... will: Protect and assist recovery of identified priority species; and Ensure that Habitat Features, Priority Habitats and Geological Features that are used by bats and other wildlife are protected and that the design including proposals for lighting does not cause severance or is a barrier to movement.'	
B4	Loss and fragmentation of habitat connectivity for bats Ten bat species were recorded during the crossing point surveys undertaken by the applicant between July and October 2017. Numerous important commuting corridors were also identified, mainly to the north of the existing A303, with more limited numbers south of the existing road, including a potential important crossing point south of Steart Wood, approximately 220 metres west of Conegore Corner. Mitigation is proposed by the applicant but the proposals are not considered to be effective mitigation for bats crossing the operational A303, a road which will be wider and with increased traffic speeds, and will lead to increased bat mortality rates. The surveying undertaken to inform the Environmental Statement and the proposed mitigation for the scheme is considered insufficient to determine bats crossing the existing A303 – surveys do not take account of the seasonal variation in prey availability and habitat use by some species of bats and no thermal imaging cameras of potential crossing points were deployed in the surveys as included in the Berthinussen and Altringham (2015) methodology.		The applicant is required to undertake further surveys for a full season and with thermal imaging cameras is required to determine how the existing A303 is being crossed by bats. This should then be included in an updated Environmental Statement. Rather than the hop-overs being proposed (which the Council considers to be ineffective in this instance) a 'green bridge' should be considered at Canegore Corner (see Berthinussen and Altringham, 2015) alongside the underpasses (which should be of appropriate dimensions) which are being provided as part of the proposed scheme. These mitigation	The NPS states in Paragraph 5.34 that 'Many individual wildlife species receive statutory protection under a range of legislative provisions'. With regard to bats this includes the Conservation of Habitats and Species Regulations 2017 regarding European protected species of which Regulation 43 makes it an offence to deliberately disturb wild animals, listed on Schedule 2, in such a way as to be likely to: a) impair their ability— (i) to survive, to breed or reproduce, or to rear or nurture their young; or (ii) in the case of animals of a hibernating or migratory species, to hibernate or migrate; or (b) <u>affect significantly the local distribution or abundance of the species to which they belong</u> The NPS state in paragraph 5.33, 'Development proposals potentially provide many opportunities for building in beneficial biodiversity or geological features as part of good design. When considering proposals, the Secretary of State should consider whether the applicant has maximised such opportunities in and around developments. The Secretary of State may use requirements or planning obligations where appropriate	Yes – the DCO should reflect the need for additional survey work and a mechanism to obtain the required mitigation once an accurate assessment of the effects has been undertaken. A mechanism which requires the applicant to consult the District Council regarding the detailed design of the scheme and its mitigation should also be required and included in the DCO.

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			measures need to be identified, designed and included in construction drawings in consultation with the District Council.	in order to ensure that such beneficial features are delivered.' The NPS states in Paragraph 5.36 'Applicants should include appropriate mitigation measures as an integral part of their proposed development, including identifying where and how these will be secured. In particular, the applicant should demonstrate that: - developments will be designed and landscaped to provide green corridors and minimise habitat fragmentation where reasonable; - opportunities will be taken to enhance existing habitats and, where practicable, to create new habitats of value within the site landscaping proposals, for example through techniques such as the 'greening' of existing network crossing points, the use of green bridges and the habitat improvement of the network verge The South Somerset District Council Local Plan policy EQ4 states 'All proposals for development..., will... promote coherent ecological networks'; 'Maximise opportunities for restoration, enhancement and connection of natural habitats'; and '... assist [the] recovery of identified priority species'. It also states that 'All proposals for development... will: Protect and assist recovery of identified priority species; and Ensure that Habitat Features, Priority Habitats and Geological Features that are used by bats and other wildlife are protected and that the design including proposals for lighting does not cause severance or is a barrier to movement'.	
B5	Bat roost provision As a result of the proposed scheme there will be a loss of roosts for bats including one house that would be demolished by the construction of the proposed road. The applicant recommends a replacement bat house and a minimum of 220 bat boxes are installed within suitable habitats adjacent to the scheme. It is not certain where the figure for bat boxes comes from or which bat populations would benefit from this seemingly a 'scatter gun' approach to provision.		The applicant is required to carry out further analysis as to roosting requirements of bats and consideration of provision for horseshoe species. Bat houses should be considered in place of boxes and the pole mounted house, which is likely to be a better long-term investment.	The NPS states in Paragraph 5.34 that 'Many individual wildlife species receive statutory protection under a range of legislative provisions'. With regard to bats this includes the Conservation of Habitats and Species Regulations 2017 regarding European protected species of which Regulation 43 makes it an offence to deliberately disturb wild animals, listed on Schedule 2, in such a way as to be likely to: a) impair their ability— (i) to survive, to breed or reproduce, or to rear or nurture their young; or	Yes – DCO should reflect the need for additional survey work and a mechanism to obtain the required mitigation once an accurate assessment of the effects has been undertaken. A mechanism which requires the applicant to consult the District

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				(ii) in the case of animals of a hibernating or migratory species, to hibernate or migrate; or (b) affect significantly the local distribution or abundance of the species to which they belong South Somerset Local Plan policy EQ4 (Biodiversity) states 'All proposals for development... will: Protect and assist [the] recovery of identified priority species'.	Council regarding the detailed design of the scheme and its mitigation should also be required and included in the DCO.
B6	Disturbance to bat species whilst occupying a place of rest A number of trees and buildings have been identified in the Environmental Statement as being of varying potential to support roosting bats. The report recommends that to reduce any impact from increased levels of disturbance from light, noise and vibration throughout construction and during operation of the scheme, a 10-metre buffer zone is observed around hedgerows and woodland, and where bat roosts have been identified. No evidence is given for these buffered distances and it is considered that the effects of disturbance from road construction (which is significant and includes piling and considerable earth movements) on roosting bats can occur up to 200m away.		The applicant is required to undertake a revised assessment of the potential disturbance to bat roosts which based on evidence and how this would be mitigated for in the construction programme should be included in an updated Environmental Statement. A condition should be included in the Construction Environmental Management Plan (CEMP) which would implement working methods to prevent disturbance to roosting bats during the construction process.	The NPS states in Paragraph 5.34 that 'Many individual wildlife species receive statutory protection under a range of legislative provisions'. It is illegal, under the Wildlife and Countryside Act 1981 (as amended) to intentionally or recklessly disturb an individual bat in its roost, which would include nearby construction activity.	Yes – the DCO should reflect the need for additional survey work and a mechanism to obtain the required mitigation once an accurate assessment of the effects has been undertaken. A mechanism which requires the applicant to consult the District Council regarding the detailed design of the scheme and its mitigation should also be required and included in the DCO. An amendment is also sought to Requirement 3 (Construction Environmental Management Plan).
B7	Species mortality - Otters The assumptions regarding otters made in the Environmental Statement states are queried. The ES assumes that otters do not cross the A303, however there are records of otter casualties and Somerset Otter Group were not consulted by the applicant's consultants. As well as being an issue currently, increased traffic speeds as a result of the proposed dualling is likely to increase the risk of future otter deaths unless adequately mitigated for.		Further mitigation is required to prevent species mortality. An underpass for otters should be provided near the Sparkford Roundabout supplemented by underpasses elsewhere. These can be designed into the scheme whilst there is opportunity to do so and included in the	The NPS states in Paragraph 5.34 that 'Many individual wildlife species receive statutory protection under a range of legislative provisions'. Paragraph 5.3.5 goes on to state '... species [which includes otters] and habitats have been identified as being of principal importance for the conservation of biodiversity in England and Wales and therefore requiring conservation action. The Secretary of State should ensure that applicants have taken measures to ensure these species and habitats are protected from the adverse effects of development. Where appropriate,	Yes – the ES needs to be updated and consultation with the appropriate bodies and mitigation measures secured in the DCO through a New Requirement on ecological protection.

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			appropriate construction drawings and specifications. Otters are a European protected species for which local populations need to be maintained at 'favourable conservation status', i.e. in this case the population to be maintained at its current level or increasing. The number of otter casualties on the A303 east of Sparkford Roundabout is significant both at a catchment level and Somerset wide.	requirements or planning obligations may be used in order to deliver this protection.' The NPS states in Paragraph 5.34 that 'Many individual wildlife species receive statutory protection under a range of legislative provisions'. With regard to otters this includes the Conservation of Habitats and Species Regulations 2017 regarding European protected species of which Regulation 43 makes it an offence to deliberately disturb wild animals, listed on Schedule 2, in such a way as to be likely to: a) impair their ability— (i) to survive, to breed or reproduce, or to rear or nurture their young; or (ii) in the case of animals of a hibernating or migratory species, to hibernate or migrate; or (b) <u>affect significantly the local distribution or abundance of the species to which they belong</u> The NPS also states in paragraph 5.33, 'Development proposals potentially provide many opportunities for building in beneficial biodiversity or geological features as part of good design. When considering proposals, the Secretary of State should consider whether the applicant has maximised such opportunities in and around developments. The Secretary of State may use requirements or planning obligations where appropriate in order to ensure that such beneficial features are delivered.' Section 99 of the Government circular 2005/06 on biodiversity and geological conservation states that '<i>It is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision.</i>' South Somerset Local Plan states 'All proposals for development..., will... promote coherent ecological networks'; 'Maximise opportunities for restoration, enhancement and connection of natural habitats'; and '... assist [the] recovery of identified priority species'.	

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B8	Species mortality - Badgers Field surveys have identified a total of 68 badger setts within 500 metres of the scheme, of which 5 have been classified as main setts. However, no surveys/monitoring of badger road casualties along the A303 have been carried out. It is considered a single unspecified underpass for badgers is not sufficient mitigation.		Further mitigation is required to prevent species mortality. Further monitoring of the existing A303 for badger mortality should be carried out and included in the Environmental Statement.	The NPS states in Paragraph 5.34 that 'Many individual wildlife species receive statutory protection under a range of legislative provisions'. Paragraph 5.3.5 goes on to state '... species [which includes otters] and habitats have been identified as being of principal importance for the conservation of biodiversity in England and Wales and therefore requiring conservation action. The Secretary of State should ensure that applicants have taken measures to ensure these species and habitats are protected from the adverse effects of development. Where appropriate, requirements or planning obligations may be used in order to deliver this protection.' The NPS states in Paragraph 5.34 that 'Many individual wildlife species receive statutory protection under a range of legislative provisions'. With regard to otters this includes the Conservation of Habitats and Species Regulations 2017 regarding European protected species of which Regulation 43 makes it an offence to deliberately disturb wild animals, listed on Schedule 2, in such a way as to be likely to: a) impair their ability— (i) to survive, to breed or reproduce, or to rear or nurture their young; or (ii) in the case of animals of a hibernating or migratory species, to hibernate or migrate; or (b) <u>affect significantly the local distribution</u> or abundance of the species to which they belong The NPS also states in paragraph 5.33, 'Development proposals potentially provide many opportunities for building in beneficial biodiversity or geological features as part of good design. When considering proposals, the Secretary of State should consider whether the applicant has maximised such opportunities in and around developments. The Secretary of State may use requirements or planning obligations where appropriate in order to ensure that such beneficial features are delivered.' Section 99 of the Government circular 2005/06 on biodiversity and geological conservation states that '<i>It is essential that the presence or otherwise of protected</i>	Yes – the ES needs to be updated and consultation with the appropriate bodies and mitigation measures secured in the DCO through a New Requirement on ecological protection.

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				<i>species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision.'</i> South Somerset Local Plan states 'All proposals for development..., will... promote coherent ecological networks'; 'Maximise opportunities for restoration, enhancement and connection of natural habitats'; and '... assist [the] recovery of identified priority species'.	
B9	Species mortality - Deer Deer casualties are not reported, and no survey of deer crossing has been included. Whilst deer are not considered of conservation concern they should be considered on health and safety grounds. No consultation appears to have been made with The Deer Initiative or Langbein Wildlife		Further mitigation is required to prevent species mortality. Consultation with The Deer Initiative and / or Langbein Wildlife concerning deer mortality and any related accident data for collisions and the results, along with any mitigation required, should be included in the Environmental Statement.	The NPS states in Paragraph 5.34 that 'Many individual wildlife species receive statutory protection under a range of legislative provisions'. Paragraph 5.3.5 goes on to state '... species [which includes otters] and habitats have been identified as being of principal importance for the conservation of biodiversity in England and Wales and therefore requiring conservation action. The Secretary of State should ensure that applicants have taken measures to ensure these species and habitats are protected from the adverse effects of development. Where appropriate, requirements or planning obligations may be used in order to deliver this protection.' The NPS states in Paragraph 5.34 that 'Many individual wildlife species receive statutory protection under a range of legislative provisions'. With regard to otters this includes the Conservation of Habitats and Species Regulations 2017 regarding European protected species of which Regulation 43 makes it an offence to deliberately disturb wild animals, listed on Schedule 2, in such a way as to be likely to: a) impair their ability— (i) to survive, to breed or reproduce, or to rear or nurture their young; or (ii) in the case of animals of a hibernating or migratory species, to hibernate or migrate; or (b) <u>affect significantly the local distribution</u> or abundance of the species to which they belong The NPS also states in paragraph 5.33, 'Development proposals potentially provide many opportunities for building in beneficial biodiversity or geological features as part of good design. When considering proposals,	Yes – the ES needs to be updated and consultation with the appropriate bodies and mitigation measures secured in the DCO through a New Requirement on ecological protection.

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				the Secretary of State should consider whether the applicant has maximised such opportunities in and around developments. The Secretary of State may use requirements or planning obligations where appropriate in order to ensure that such beneficial features are delivered.' Section 99 of the Government circular 2005/06 on biodiversity and geological conservation states that <i>'It is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision.'</i> South Somerset Local Plan states 'All proposals for development..., will... promote coherent ecological networks'; 'Maximise opportunities for restoration, enhancement and connection of natural habitats'; and '... assist [the] recovery of identified priority species'.	
B10	Effects on Barn Owls and their habitats The Environmental Statement states that temporary habitat loss for Barn Owls will have a Minor Adverse Effect whereas permanent loss of habitat through the realignment of the road and land take of the scheme will be Moderate Adverse Effect due the proximity of the works to the territory of one of the known breeding pairs. This would mean potential decrease in their foraging success without moving their territory. It appears that no mitigation is given for permanent loss of habitat affecting the viability of one breeding pair of barn owls.		The scheme should provide replacement habitat to offset the permanent loss of habitat to ensure the viability of the breeding pair of barn owls possibly through off site enhancement. Defra's Biodiversity offsetting metric or Somerset's Habitats Evaluation Procedure should be used to calculate the equivalent amount of habitat needed to replace that lost during construction. Both methods include temporal and risk factors and are compatible with each other. This would then give confidence that the landscaping associated with the proposed road scheme provides sufficient	The NPS states in paragraph 5.35, 'Other... species have been identified as being of principal importance for the conservation of biodiversity in England and Wales and therefore requiring conservation action. The Secretary of State should ensure that applicants have taken measures to ensure these... species are protected from the adverse effects of development...' Paragraph 5.20 of the NPS mentions that 'Government policy for the natural environment is set out in the Natural Environment White Paper (NEWP). The NEWP sets out a vision of moving progressively from net biodiversity loss to net gain.' This has been taken forward in the more recent National Planning Policy Framework 2018 (NPPF) of which paragraph 170 states: 'Planning... decisions should contribute to and enhance the natural and local environment by... minimising impacts on and providing net gains for biodiversity...' The South Somerset District Council Local Plan policy EQ4 states 'All proposals for development... will: Protect and assist [the] recovery of identified priority species'.	Yes – the ES needs to be updated and consultation with the appropriate bodies and mitigation measures secured in the DCO through a New Requirement on ecological protection.

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			mitigation and indeed provides enhancement. Where mitigation is insufficient the appropriate amount and type should be added to the scheme either on or off site. Furthermore, the scheme should show a resultant enhancement for biodiversity including through habitat creation. The mitigation, enhancement and monitoring set out in the report must be secured through the DCO.		
B11	Breeding birds Environmental Statement, Volume 6.3 Appendix 8.6 Breeding Bird Technical Report states that a total of 47 species were recorded during the surveys within the study area and a total of 45 species were recorded within the works boundary. Nine species are listed on Section 41 of the NERC Act 2006 and one, the Hobby, is listed on Schedule 1 of The Wildlife and Countryside Act 1981. A pair of Hobby was confirmed to be breeding within the study area but outside the scheme boundary as was the Song Thrush. Meadow Pipit, Mistle Thrush and Skylark, listed on Section 41 of the NERC Act 2006, were all also recorded immediately adjacent to the scheme boundary. The upgrade of the A303 along this section from a single carriageway to dual would change the ability of some species to move through the landscape due to the increased width of the road and associated landscaping and traffic speeds. The loss and fragmentation of breeding bird habitat would have a wide-ranging impact with about a third of all the species recorded utilising this habitats within the study area. The importance of hedgerows is especially pertinent considering the wider arable landscape. Mitigation is put forward but no assessment of impacts or mitigation for noise is given.		Defra's Biodiversity offsetting metric or Somerset's Habitats Evaluation Procedure should be used to calculate the equivalent amount of habitat needed to replace that lost during construction and subsequently due to traffic noise. Both methods include temporal and risk factors and are compatible with each other. This would then give confidence that the landscaping associated with the proposed road scheme provides sufficient mitigation and indeed provide enhancement. Where mitigation is insufficient the appropriate amount and type should be added to the scheme	The NPS states in paragraph 5.35, 'Other... species have been identified as being of principal importance for the conservation of biodiversity in England and Wales and therefore requiring conservation action. The Secretary of State should ensure that applicants have taken measures to ensure these... species are protected from the adverse effects of development...' The NPS states in Paragraph 5.34 that 'Many individual wildlife species receive statutory protection under a range of legislative provisions'. The hobby is listed on Schedule 1 of the Wildlife and Countryside Act 1981 (as amended) and is provided from additional protection from intentional or reckless disturbance whilst breeding and with dependent young. The South Somerset District Council Local Plan policy EQ4 states 'All proposals for development... will: Protect and assist [the] recovery of identified priority species'.	The ES requires updating as does the CEMP which is to be certified under art 43 to refer to this if necessary. Regulation 3 (Construction Environment Management Plan) may need to be amended or a New Requirement on ecological protection used.

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			either on or off site. Furthermore, the scheme should show a resultant enhancement for biodiversity including through habitat creation. This needs to be included in an updated Environmental Statement. A CEMP should include detailed measures for avoiding impacts nesting birds. This would also include details of the screening to protect the nesting hobbies form disturbance.		
B12	Consideration of Great Crested Newts Three distinct meta-populations of Great Crested Newts are identified, though only two would be subject to effects as a result of the scheme. Meta-population A, located at Downhead, has a medium population and meta-population C, located at Hazlegrove, has a medium population. Meta-population B located at Yarcombe was excluded from further assessment as all ponds associated with this meta-population are over 500 metres from the construction footprint of the scheme. The survey methods used are generally in accordance with best practice and fit for purpose. Pond 32 to the south of the A303 is possibly linked to ponds north of the A303 through dispersal of juveniles. The A303 is unlit and not heavily trafficked at night. Dualling will reduce the likelihood of successful dispersal occurring and increase the chances of mortality. What evidence is there that GCN's will cross / not cross roads? Are there other ponds to the south of the road that would support this apparently isolated population? No mitigation is given against potential hazards to great crested newts in the carriageway. Any gullies and kerbs can trap and cause mortality to the species.		The applicant is required to provide further evidence on the ability of GCNs to cross roads or not and whether the population south of the road is likely to become increasingly isolated following construction of a dual carriageway. Each of these local populations would still need to be assessed for Favourable Conservation Status and included in an updated Environmental Statement. In areas where dispersal is likely to occur, and if no underpasses are provided / possible, the carriageways need to be designed to be GCN friendly, e.g. with appropriate drainage such as using offset gullies and traversable kerbing. These need to be shown in the relevant construction plans.	The NPS states in Paragraph 5.34 that 'Many individual wildlife species receive statutory protection under a range of legislative provisions'. Paragraph 5.3.5 goes on to state '... species [which includes great crested newts] and habitats have been identified as being of principal importance for the conservation of biodiversity in England and Wales and therefore requiring conservation action. The Secretary of State should ensure that applicants have taken measures to ensure these species and habitats are protected from the adverse effects of development. Where appropriate, requirements or planning obligations may be used in order to deliver this protection.' The NPS states in Paragraph 5.34 that 'Many individual wildlife species receive statutory protection under a range of legislative provisions'. With regard to otters this includes the Conservation of Habitats and Species Regulations 2017 regarding European protected species of which Regulation 43 makes it an offence to deliberately disturb wild animals, listed on Schedule 2, in such a way as to be likely to: a) impair their ability— (i) to survive, to breed or reproduce, or to rear or nurture their young; or	Yes – the DCO should reflect the need for additional survey work and a mechanism to obtain the required mitigation once an accurate assessment of the effects has been undertaken. A mechanism which requires the applicant to update the ES and consult the District Council regarding the detailed design of the scheme and its mitigation should also be required and included in the DCO.

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				(ii) in the case of animals of a hibernating or migratory species, to hibernate or migrate; or (b) <u>affect significantly the local distribution</u> or abundance of the species to which they belong South Somerset Local Plan Policy EQ4 (Biodiversity) states 'All proposals for development... will: Protect and assist [the] recovery of identified priority species'.	
B13	Invertebrate survey and assessment As well as brown hairstreak (see below), a single white letter hairstreak, a BAP, s41 priority species was recorded on the southern perimeter of Site 5 (?). Six species of nationally scarce flies were recorded and nationally scarce mining bee on Sites 2 and 10 (?). It would be helpful if the site locations were stated. No assessment of the effects of increased carriageway widths due to dualling the A303 is given with regard to invertebrate dispersal and possible increased mortality. No mention is made of establishing areas of scrub in the landscape proposals which is also important for invertebrates and their prey.		The Environmental Statement should include an assessment of the effects of proposed dualling over the current situation on the existing A303 for the dispersal of invertebrates. The CEMP should include details of how the effects of construction would be mitigated to prevent harm to priority and nationally scarce species of invertebrates. Wood arising from any trees to be felled should be stacked into habitat piles to provide habitat for saproxylic species. These habitat piles should be placed in a range of sunny and shady locations. Details should be included in the CEMP. Landscape plans to include the establishment of scrub areas for invertebrates planted with host flora. This should be shown in updated landscape plans and management of such in the LEMP.	The NPS states in paragraph 5.35, 'Other... species have been identified as being of principal importance for the conservation of biodiversity in England and Wales and therefore requiring conservation action. The Secretary of State should ensure that applicants have taken measures to ensure these... species are protected from the adverse effects of development...' South Somerset Local Plan Policy EQ4 (Biodiversity) states 'All proposals for development... will: Protect and assist [the] recovery of identified priority species'.	Yes – the DCO should reflect the need for additional survey work and a mechanism to obtain the required mitigation once an accurate assessment of the effects has been undertaken. A mechanism which requires the applicant to update the ES and consult the District Council regarding the detailed design of the scheme and its mitigation should also be required and included in the DCO.
B14	Environmental Masterplan There are extensive areas of amenity grassland that should not be top soiled and seeded. This would favour nitrogen loving species and reduce the diversity of flora species and		The specification for soils in the Soils Handling and Management Plan should	Paragraph 5.33 of the NPS states that 'Development proposals potentially provide many opportunities for building in beneficial biodiversity or geological features	Yes – the DCO should reflect the need for additional survey work

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	hence invertebrates including pollinators. Similarly, the use of top soil for other habitat areas is likely to not fully exploit the diversity of species possible. It is noted that amenity grassland is specified for the routes of Public Rights of Way. Generally, the indicative species planting mixes are questionable for this part of Somerset and for the number of species.		state that amenity grassland areas be made with sub soil, chalk or planings and allowed to be colonised or seeded with a wild flower mix. These areas would then favour non-nitrogen loving species, provide a richer species diversity and reduce rank grassland, which in turn require less cutting and hence maintenance costs. Other areas of habitat enhancement should not be created using top soil but with sub soil, or sub soil with inverted top soil. This will promote flora species and an associated abundance of pollinators. Natural England requested that in the Landscape and Ecological Management Plan (LEMP), 'cut and remove' was employed for grassland management (including amenity grassland) to reduce nutrient levels and increase diversity¹. However, it is considered that this should be part of the Soils Handling and Management Plan. PROW can be maintained through being mown 1 metre wide through these areas when required. They do not especially need to be an amenity grass mix where a wild flower meadow mix would be of higher benefit to	as part of good design. When considering proposals, the Secretary of State should consider whether the applicant has maximised such opportunities in and around developments. The Secretary of State may use requirements or planning obligations where appropriate in order to ensure that such beneficial features are delivered.' The scheme provides an opportunity to contribute to the Somerset County Council's recently adopted Pollinator Action Plan and 'The National Pollinator Strategy: for bees and other pollinators in England' (Defra, 2014²). South Somerset Local Plan Policy EQ4 (Biodiversity) states 'Maximise opportunities for restoration, enhancement and connection of natural habitats; and Incorporate beneficial biodiversity conservation features where appropriate'.	and a mechanism to obtain the required mitigation once an accurate assessment of the effects has been undertaken. A mechanism which requires the applicant to update the ES and consult the District Council regarding the detailed design of the scheme and its mitigation should also be required and included in the DCO.

¹ https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010036/TR010036-000243-A303_8.2_SoCG_NE.pdf

² https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/409431/pb14221-national-pollinators-strategy.pdf

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			biodiversity. The Landscape Masterplan needs to be amended. The DCO requires amending and appropriate management given to habitats in a Landscape and Ecological Management Plan. Consultation with local ecologists and /or botanists is recommended prior to finalising planting mixes for landscaping.		

Economy and Community Impacts

The economic value and positive benefits that the proposed dualling scheme will provide through increased capacity, improved connectivity and journey resilience for South Somerset and the wider South West is recognised and supported by the District Council. The Council recognises this in its Local Plan Review where it looks at maximising the economic benefits of the proposed upgrade. The provision of a new construction workforce locally will also be beneficial for the economy. The Council is however aware that there is some concern amongst the business community that if approved, there may be disruption during the construction of the proposed scheme which would adversely impact upon businesses and that the viability of some route-reliant businesses will be adversely affected in the long-term. Suitable mitigation and compensation is sought, see below.

The benefits of a safer route are recognised and welcomed but there are concerns from the communities of West Camel, Queen Camel and Sparkford regarding increased vehicle movements through their communities as a result of the proposed scheme and the adverse effects of this. Additionally, there are some concerns about the potential impacts on communities further away from the scheme as a result of capacity issues that arise at Podimore Roundabout during the summer months because of the proposed scheme. Suitable mitigation is sought for these communities. Diversionary routes and the impacts upon communities is also of concern.

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ECI1	Local Impact Area The defined Local Impact Area for businesses is restrictive and does not allow impacts on various route-reliant businesses and visitor attractions to be taken into account. A number of small businesses and tourist attractions such as Haynes International Motor Museum, Hadspen House (Emily Estate to open spring 2019), Hauser and Wirth and Fleet Air Arm Museum are outside this tightly drawn area.		The applicant should consider widening the Local Impact Area and consideration should be given to the impact on the wider business community and RNAS Yeovilton who are a major employer in the area.	Paragraph 3.2 of the NPS recognises that the development of national road networks should be designed to minimise social impacts and improve quality of life. Paragraph 3.3 of the NPS requires applicants to provide evidence that they have considered opportunities to deliver social benefits as part of schemes. South Somerset Local Plan (2006-2028) seeks to support businesses and tourist facilities across the District.	Yes. Any identified adverse impacts of widening the Local Impact Area should be suitably mitigated through the requirements
ECI2	Signage and Traffic Management for Businesses It is recognised that Somerset County Council, as the Local Highway Authority, has approved the outline principle of the signage strategy (see T2 above), however the effective management of traffic and good signage, especially during the construction phase of the proposed route will be essential, to ensure that businesses and communities are not negatively impacted. The message should be clear that "South Somerset is still open for business".		Highways England should consult with tourist attractions, other businesses and employers within and outside the defined impact area in respect of	Paragraph 3.3 of the NPS requires applicants to provide evidence that they have considered opportunities to deliver social benefits as part of schemes.	Yes. Ensuring the signage requirements reflect the requirement for consultation with local businesses, tourist attractions and employers and secure

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			a signage strategy. The strategy should be both for during the construction period and after, when the road is fully operational. The applicant should mitigate any loss to the visitor attractions and businesses and employers suffered as a result of disruption during the period of construction and as a result of the development.	South Somerset Local Plan (2006-2028) seeks to support businesses and tourist facilities across the District.	mitigation for loss to be agreed either through a new requirement or obligation as appropriate.
ECI3	Increased Vehicle Movements through West Camel and Sparkford Vehicle movements increase as a result of the proposed scheme by 600 vehicles a day through West Camel (a 42% increase from 1,400 to 2,000 vehicles per day) and 1,800 vehicles a day through Sparkford High Street (a 37% increase from 4,900 to 6,700 vehicles a day). (See Somerset County Council LIR issue Ref. T4, T9 and T10). Whilst the level of significance of the increase in traffic through the village has not been assessed by the applicant (see Somerset County Council LIR issue Ref. T8) the effects would be significant for those communities and therefore traffic calming measures and other mitigation measures should therefore be explored and considered by the ExA, and a mechanism established to secure such mitigation. The baseline information for planning approvals used to generate traffic and transport movement has not considered employment development in Sparkford or surrounding employment locations which could generate additional transport movements – see response to ExA Question 1.9.5.		It is recommended that mitigation is introduced into the local highway such as traffic calming.	Paragraph 3.2 of the NPS recognises that the development of national road networks should be designed to minimise social impacts and improve quality of life. Paragraph 3.3 of the NPS requires applicants to provide evidence that they have considered opportunities to deliver social benefits as part of schemes. South Somerset Local Plan (2006-2028) Policy TA5 (Travel Impact of New Development) all new development is required to address its own transport implications.	The mitigation would need to be secured via a planning obligation.
ECI4	Podimore Roundabout and impact on surrounding communities The Council is also concerned about the ability of the Podimore roundabout to function, particularly during the summer months, and the impact that any queues and delays would have upon surrounding communities (see Somerset County Council LIR issue Ref.T11).		This junction is included for improvement as part of the A303 corridor however there is currently no certainty about the nature and timing of this improvement. It is therefore advised that an interim improvement to increase the capacity at the junction is developed; the nature of this will depend on the existing infrastructure and the current signal control systems. However, such measures should be	Paragraph 3.2 of the NPS recognises that the development of national road networks should be designed to minimise social impacts and improve quality of life. Paragraph 3.3 of the NPS requires applicants to provide evidence that they have considered opportunities to deliver social benefits as part of schemes. South Somerset Local Plan (2006-2028) Policy TA5 (Travel Impact of New Development) all new development is required to address its own transport implications.	The mitigation would need to be secured via a planning obligation

Ref	Specific Issue	Rating	Summary of Council's proposed mitigation (including link to other representation)	Relevant Planning Consideration Reference (NPS, Local Policy, Guidance, Local Evidence etc.)	Add/Amend DCO Requirement/Obligation (Y/N)
			sufficient to mitigate the impact		
EC15	Traffic Management and Diversionary Routes The District Council is concerned about the impacts of any diversionary routes on settlements during the construction of the scheme (see Somerset County Council LIR issue Ref. T4). The applicant notes that in 2015, an average of 23,500 vehicles a day used this stretch of the A303, this figure has no doubt increased. Given the lack of detail on this matter, the impact of the diversions on communities such as West Camel, Queen Camel, Marston Magna, Mudford and even Yeovil should be considered as it is of concern locally. Large volumes of traffic, including HGVs travelling through these communities, where the roads are not designed for such a purpose, creates significant concern.		See SCC comments at impact T4 above.	Paragraph 3.2 of the NPS recognises that the development of national road networks should be designed to minimise social impacts and improve quality of life. Paragraph 3.3 of the NPS requires applicants to provide evidence that they have considered opportunities to deliver social benefits as part of schemes. South Somerset Local Plan (2006-2028) Policy TA5 (Travel Impact of New Development) all new development is required to address its own transport implications.	See SCC comments at impact T4 above.

Air Quality					
Air quality is generally good in South Somerset, with low levels of sulphur, oxides of nitrogen and particulates in comparison to the rest of England. The District Council raises no significant air quality issues as a result of the proposed scheme, although the concerns over increased traffic in West Camel and Sparkford require the applicant to undertake additional investigative work.					
Ref	Specific Issue	Rating	Summary of Council's proposed mitigation (including link to other representation)	Relevant Planning Consideration Reference (NPS, Local Policy, Guidance, Local Evidence etc.)	Add/Amend DCO Requirement/Obligation (Y/N)
AQ1	Baseline and Assessment Methodology SSDC are confident that the baseline information and assessment methods used in respect of air quality modelling is satisfactory. There appears to be no significant changes to air quality from the proposed scheme itself and as such, no mitigation measures have been proposed.		N/A	The baseline and assessment methodology accords with the National Policy Statement (para 5.84-5.86) the National Planning Policy Framework and SSDC Local Plan Policy EQ7 (Pollution Control).	N
AQ2	West Camel and Sparkford High Street There are two areas of concern to the Council, West Camel and Sparkford High Street where it is predicted the scheme will result in significantly increased traffic movements which may have an adverse effect on air quality.		The District Council requires the applicant to undertake further investigation to ensure these areas will not exceed air quality limits and to determine whether appropriate mitigation measures are necessary. The Council seeks the opportunity to engage with the developer to ensure the national air		Yes – DCO should reflect the need for additional survey work and a mechanism to obtain the required mitigation once an accurate assessment of the effects has been undertaken. A mechanism which requires the applicant to consult the District Council regarding the detailed design of the

Ref	Specific Issue	Rating	Summary of Council's proposed mitigation (including link to other representation)	Relevant Planning Consideration Reference (NPS, Local Policy, Guidance, Local Evidence etc.)	Add/Amend DCO Requirement/Obligation (Y/N)
			quality objectives continue to be met within South Somerset.		scheme and its mitigation should also be required and included in the DCO.

Noise and Vibration

The Council raises no significant issues in respect of noise and vibration. There are concerns over increased traffic in West Camel and Sparkford.

Ref	Specific Issue	Rating	Summary of Council's proposed mitigation (including link to other representation)	Relevant Planning Consideration Reference (NPS, Local Policy, Guidance, Local Evidence etc.)	Add/Amend DCO Requirement/Obligation (Y/N)
NV1	Baseline and Assessment Methodology SSDC are confident that the baseline information and assessment methods used in respect of noise and vibration is satisfactory, the assessment methods used are appropriate and the presentation of the results clearly demonstrate the likely effects the proposed scheme will have during construction and when in operation. Noise modelling has been conducted and where appropriate has included mitigation measures, this coupled with low noise road surfacing will help to reduce the level of noise.		It is expected and understood that Best Practice Measures will be implemented during construction to mitigate the adverse effects of noise and vibration. Approval is to be obtained from the District Council through the Section 61 process which will ensure any mitigation identified will have no residual significant impacts.	With reference to the National Policy Statement, the National Planning Policy Framework and SSDC Local Plan Policy EQ7 – Pollution Control	N
NV2	West Camel and Sparkford High Street There are two areas of concern to the Council, West Camel and Sparkford High Street where it is predicted the scheme will result in significantly increased traffic movements which may have an adverse effect on local residents in terms of increased noise levels.		Any potential traffic calming mitigation offers the opportunity to “do something” to address the increased noise and we would welcome the opportunity to engage with the developer to ensure the national and local planning objectives continue to be met within South Somerset.		Yes – the ES should be updated to require further assessment and to be reflected in Regulation 14 which deals with noise mitigation.

7. Concluding Statement

- 7.1 The extent of agreement reached between the Joint Councils and Highways England on the impacts of the proposed development is set out in the Draft Statement of Common Ground submitted on the same day as this LIR. However, the Joint Councils remain very concerned that a range of adverse individual and cumulative impacts identified by Highways England and/or the Joint Councils in their respective assessments will not be mitigated adequately or at all.
- 7.2 Notwithstanding these concerns, the Joint Councils have in this LIR sought to identify constructively where further information and proposals are needed, to ensure that the adverse local impacts of the proposed development are adequately mitigated. Informed by on-going engagement with Highways England, the Joint Councils have proposed ways in which adverse local impacts from the dualling of the A303 between Sparkford and Ilchester can be satisfactorily mitigated by various mechanisms, such as planning obligations and requirements (including written approval of detailed mitigation measures). The Joint Councils will continue to engage with Highways England on mitigation measures as the Examination progresses.
- 7.3 The Joint Councils submit that their mitigation proposals, if delivered in their entirety, would ensure that necessary and proportionate mitigation is secured to address the impacts of the proposed development during construction and operation.



A303 Sparkford to Ilchester Dualling Scheme
PINS Reference: TR010036

Local Impact Report
Appendix 1
Cultural Heritage (Built Heritage) Topic Paper

A303 SPARKFORD TO ILCHESTER DUALLING SCHEME
APPENDIX 1
Cultural Heritage (Built Heritage) Topic Paper

Note: Please refer to the Cultural Heritage (Archaeology) Topic Paper for archaeological issues.

1. PURPOSE OF TOPIC PAPER

- 1.1 The purpose of this topic paper is to set out in further detail issues in relation to Cultural Heritage that have been raised in the Local Impact Report.

2. BACKGROUND

- 2.1 The dualling scheme has been designed to minimise land take from the Hazlegrove House Registered Park & Garden (RPG), to avoid known archaeological sites, and limit the impact on historic buildings and areas. Chapter 6, the Environmental Statement (ES) for Cultural Heritage, reports on those heritage assets that will continue to be affected by significant adverse effects following planned mitigation measures. These findings are supported with the exception for a small number of heritage assets that have either been overlooked in the underlying Desk Base Assessment (DBA) or the Hazlegrove House Statement of Significance, or where the judgement of heritage value or magnitude of impact is challenged. These cases are detailed in section 3. below.
- 2.2 The number of heritage assets that would be significantly adversely affected is expected to be higher than reported and will require additional mitigation measures.

3. ISSUES

3.1 Camel Hill Farm and Outlying Farmsteads

- 3.1.1 **Paragraph 6.7.10 of Chapter 6 Cultural Heritage, & Paragraph 7.2.1, Tables 7.1 of the DBA:** The ES identifies the establishment of post-medieval farmsteads. Some of the farmsteads and isolated houses are likely to be historically connected to the Hazlegrove House estate and other land holdings.

Camel Hill Farm in particular is a fine 19th century farmstead, largely unaltered, and with evidence of an earlier range to the rear of the farmhouse; a surprising omission from the National Heritage List for England. Its value/sensitivity is identified as being 'Low', in line with being an undesignated local heritage asset, but could rise to 'Medium' if it were found to be historically associated with the neighbouring Hazlegrove House estate.

A 'Medium' value would escalate the significance of effects for the construction impacts from 'Slight Adverse' to 'Moderate Adverse' and be considered 'significant'.

- 3.1.2 **Mitigation:** Information on the association between the Hazlegrove House estate and surrounding historical farmsteads would ensure an adequate understanding of the historical significance of the outlying historic buildings to the Hazlegrove House estate.

Any resulting increase in heritage value of these asset should be included in the Cultural Heritage DBA. Those with significant effects taken through to the Cultural Heritage ES with appropriate design, mitigation and enhancement measures.

- 3.1.3 **Policy:** Paragraph 5.125 of the NPS requires the Secretary of State to consider the impacts on non-designated heritage assets on the basis of clear evidence that the assets have a significance that merits consideration.

Paragraphs 5.126 of the NPS requires the applicant to assess the significant heritage impacts of the proposed project.

Paragraph 5.127 of the NPS requires the applicant to describe the significance of any heritage assets affected.

South Somerset Adopted Local Plan (2006-2028): Policy EQ3 (Historic Environment) requires heritage assets to be conserved and where appropriate enhanced for their historic significance and important contribution to local distinctiveness, character and sense of place.

3.2 **W Sparrow Road Gullies**

- 3.2.1 Two 'W SPARROW LTD MARTOCK' stamped cast iron gullies survive close to the entrance of Wayne's Bar & Bistro at Camel Cross, just south of the A303/B3151 junction. These were produced by a local foundry and are likely to be associated with the former route of the A303 between Camel Cross and Ilchester before the construction of the Ilchester bypass.

These undesignated heritage assets should be included in the Cultural Heritage DBA and an appropriate measure of mitigation included in the Cultural Heritage ES. Their accession to an appropriate local museum would be suitable.

- 3.2.2 **Mitigation:** A planning requirement requiring the careful removal of the gully grates and frames and their offer for accessioning to the museum collections of the South West Heritage Trust or other appropriate local museum.

- 3.2.3 **Policy:** Paragraph 5.125 of the NPS requires the Secretary of State to consider the impacts on non-designated heritage assets on the basis of clear evidence that the assets have a significance that merits consideration.

Paragraphs 5.126 of the NPS requires the applicant to assess the significant heritage impacts of the proposed project.

Paragraph 4.20 of the NPS allows the Secretary of State to attach planning requirements for unresolved details.

3.3 **Howell Hill Stone Boundary Wall**

- 3.3.1 A Camel Stone boundary wall exists on the east side of Howell Hill. This is a locally distinctive feature of heritage and landscape value, being on an historic boundary, constructed of the local creamy-grey White Lias building stone, and an unusual example of a field boundary stone wall in the area.

The boundary wall should be retained through either its repair and retention on its current alignment or its rebuilding on the alignment of the revised boundary to the Howell Hill carriageway.

- 3.3.2 **Mitigation:** Retention of the stone boundary wall in the detailed design scheme approved under Planning Requirement 12 of the DCO and the landscaping scheme approved under Planning Requirement 5 of the DCO.

- 3.3.3 **Policy:** Paragraph 4.20 of the NPS allows the Secretary of State to attach planning requirements for unresolved details.

South Somerset Adopted Local Plan (2006-2028): Policy EQ2 (General Development) requires “development to be designed to achieve a high quality, which . . . preserves or enhances the character and appearance of the district”. Developments will be considered against, inter alia, conserving and enhancing the landscape character of the area.

3.4 **Pre-Worboys ‘Cross Roads’ Warning Sign**

- 3.4.1 A pre-Worboys ‘Cross Roads’ highway warning sign survives outside of The Gables in Podimore. This is an undesignated highway heritage asset and should be included for assessment in the Cultural Heritage DBA. However, it would likely be considered unaffected by the scheme and not taken forward from the DBA scoping exercise.

Awareness of this vulnerability roadside heritage asset to construction site personnel would be advisable to avoid accidental damage.

3.4.2 **Mitigation:** Inclusion on the register of sensitive environmental features in the CEMP under Planning Requirement 3 of the DCO.

3.4.3 **Policy:** Paragraph 4.20 of the NPS allows the Secretary of State to attach planning requirements for unresolved details.

3.5 Turnpike Road (MM103)

3.5.1 **Paragraph 6.7.5 of Chapter 6:** The ES identifies the A303 corridor as an ancient route but with no further information on its historical development and significance.

Paragraph 7.2.1 Table 7.1 of the DBA: The DBA states that “The historic setting of the asset has already been lost due to the construction of modern roads along the route of the historic turnpike. However, its value is retained through the surviving route”, and the value / sensitivity is assessed as of ‘Medium’ value.

Paragraph 7.3.1 Table 7.2 of the DBA: In this table the value/sensitivity for MM103 is recorded as ‘Low’; a discrepancy with Tables 7.1 and 7.3 where it is recorded as being ‘Medium’.

The magnitude of impact for both the temporary and permanent works are judged to be ‘Negligible’ despite significant off-line realignment and severance in places, its incorporation for sections in link roads, and the remodelling of the road corridor with substantial bunding and planting for mitigation screening works. To date there has been little deviation of the modern A303 from the turnpiked route between the Hazlegrove roundabout to Camel Cross.

The heritage value, magnitude of impact, significance of effects for MM103 (the Martcok to Sparkford Turnpike Road) requires reassessment. Reference to Bentley JB and Murless BJ (1985) *The Legacy of the Turnpikes: Phase 1*. is recommended.

3.5.2 **Mitigation:** Reassessment of heritage asset MM103 with any resulting increase in the significance of effects included in the Cultural Heritage ES with appropriate mitigation measures.

Mitigation might include markers, information points or public art at intervals along the historic alignment of the Turnpike road (where it would no longer form the A303) to retain evidence of its historic route.

3.5.3 **Policy:** Paragraph 5.125 of the NPS requires the Secretary of State to consider the impacts on non-designated heritage assets on the basis of clear evidence that the assets have a significance that merits consideration.

Paragraphs 5.126 of the NPS requires the applicant to assess the significant heritage impacts of the proposed project.

Paragraph 5.127 of the NPS requires the applicant to describe the significance of any heritage assets affected.

South Somerset Adopted Local Plan (2006-2028): Policy EQ3 (Historic Environment) requires heritage assets to be conserved. All new development proposals relating to the historic environment will be expected to safeguard the significance of heritage assets.

3.6 **Canegore Corner Listed Milestone (MM30)**

- 3.6.1 **Paragraph 6.9.1 of the Chapter 6 Cultural Heritage ES & Paragraph 7.3.1, Table 7.2 of the DBA:** The magnitude of impact for MM30 (Milestone at Canegore Corner) is judged to be 'Moderate' despite the listed milestone being permanently removed from its location and its setting and relationship with the A303 being fundamentally altered on its relocation; which has yet to be identified.

A greater magnitude of impact is considered appropriate for the construction phase effects. Agreement on its relocation is also required.

Options for the re-siting are limited due to its association with the Ilchester Trust turnpike road (modern A303) and destination mileage on its cast iron plate. A position on the south side of the extended Steart Hill road (existing section of the A303) would be close to its current position and on a retained section of the turnpike road, albeit not on the new alignment.

- 3.6.2 **Mitigation:** Inclusion on the register of sensitive environmental features in the CEMP under Planning Requirement 3 of the DCO.

Full details for its safe removal and storage in the CEMP under Planning Requirement 3 of the DCO.

Identified position for its relocation, approved by the Secretary of State in consultation with the local planning and highway authorities, in the detailed design scheme approved under Planning Requirement 12 of the DCO.

- 3.6.3 **Policy:** Paragraphs 5.126 of the NPS requires the applicant to assess the significant heritage impacts of the proposed project.

Paragraph 4.20 of the NPS allows the Secretary of State to attach planning requirements for unresolved details.

South Somerset Adopted Local Plan (2006-2028): Policy EQ3 (Historic Environment) requires heritage assets to be conserved. All new development proposals relating to the historic environment will be expected to safeguard the significance of heritage assets.

Please note: Attempts to inspect this listed milestone recently have proved unsuccessful. It may have been removed or be hidden by vegetation.

3.7 **B3151 Listed milestone (MM13)**

- 3.7.1 **Paragraph 7.3.1, Table 7.2 of the DBA:** The magnitude of impact for MM13 (Milestone on B3151) is judged to be 'Negligible'. This is a fair assessment. However, the milestone is on the edge of the scheme and could be accidentally damaged if it is not identified and protected.

The milestone is heavily covered in ivy and embedded in the hedge. It's approximately 1.2 m high, of Ham stone and with its cast iron plate missing. It is positioned approximately 5 metres east of the field gate. Despite its size it is easily overlooked.

- 3.7.2 **Mitigation:** Inclusion on the register of sensitive environmental features in the CEMP under Planning Requirement 3 of the DCO.

Full details for its protection during the construction works in the CEMP under Planning Requirement 3 of the DCO.

- 3.7.3 **Policy:** Paragraph 4.20 of the NPS allows the Secretary of State to attach planning requirements for unresolved details.

3.8 **Bakery (MM273)**

- 3.8.1 **Paragraph 7.3.1, Table 7.2 of the DBA:** The magnitude of impact for asset MM273 (Bakery and former Methodist church) is judged to be 'Moderate' from the permanent realignment of the A303. A greater magnitude of impact is considered appropriate.

The bakery was established over 100 years ago to serve travellers on this strategic road and is a well-known facility on the A303 with its outside loaves of bread. The realignment of the A303 will remove the Bakery's location alongside a main through-route, thus fundamentally alter its relationship with its setting and threaten its historic use.

Table 6.3 of Annex 6 to Volume 11, Section 3, Part 2 of the DMRB outlines a Major impact as including 'comprehensive changes to the setting', which the

change in road alignment would appear to constitute for this asset. This would raise the significance of effects to a 'significant' level.

- 3.8.2 **Mitigation:** Reconsider the magnitude of impact, with any resulting increase in the significance of effects included in the Cultural Heritage ES with appropriate mitigation measures.

- 3.8.3 **Policy:** Paragraph 5.125 of the NPS requires the Secretary of State to consider the impacts on non-designated heritage assets on the basis of clear evidence that the assets have a significance that merits consideration.

Paragraphs 5.126 of the NPS requires the applicant to assess the significant heritage impacts of the proposed project.

3.9 **Group Assessments**

- 3.9.1 **Paragraph 2.1.1 of the Cultural Heritage DBA:** Adjacent heritage assets are assessed within a common group and assigned a 'GR' reference. This works well for heritage assets of the same value/sensitivity, or where the Group value/sensitivity is equal to the highest individual asset in the group.

It's potentially misleading in relation to individual buildings in a group where assets of 'High' value/sensitivity are part of a lower valued group. GR06 (Podimore), GR07 (Queen Camel Conservation Area) and GR08 (West Camel Conservation Area) are examples. These historic settlements are assigned 'Medium' value/sensitivity but include Grade I and II* listed buildings that would normally be considered to have a 'High' value/sensitivity.

The assessment of the significance of effects for these 'High' value/sensitivity is therefore downgraded, and the assessment could mask a significant effect on a heritage asset that is not taken forward for further consideration.

- 3.9.2 **Mitigation:** Higher value/sensitivity assets in a Group to be assessed individually, with any resulting increase in the significance of effects included in the Cultural Heritage ES with appropriate design, mitigation and enhancement measures.

- 3.9.3 **Policy:** Paragraphs 5.126 of the NPS requires the applicant to assess the significant heritage impacts of the proposed project.

Paragraph 5.131 of the NPS requires the Secretary of State to give great weight to the conservation of a designated heritage asset.

3.10 **Impact of Potential Traffic Calming on the Conservation Area**

- 3.10.1 **Paragraph 7.4.1, Table 7.3 of the DBA:** There is no reference in the Cultural Heritage DBA operational impact schedule on the potential increase in traffic passing through local conservation area or by roadside listed buildings arising from local traffic no longer using the realigned A303.

The potential impacts could include:

- a) An increase in vehicle flow and noise on the character of conservation area and listed buildings.
 - b) The introduction of traffic calming measures in response to increase vehicle flow and noise, introducing new traffic calming measures that would likely have an adverse impact on the character and appearance of a conservation area and setting of the listed buildings, i.e. highway lighting, signage, lining, bollards and build-out.
 - c) An increase in traffic-induced vibration from HGVs on the fragile fabric of roadside listed and historic buildings and bridges. There is also the potential issue of vibration from HGVs passing over traffic calming tables close to historic buildings.
- 3.10.2 **Mitigation:** Where traffic modelling for the scheme indicates an increase in traffic flow and HGV traffic as a direct outcome of the scheme, the impacts of increased traffic, associated traffic calming measures and increased traffic-induced vibration on heritage assets should be assessed and appropriate measure of mitigation included in the Cultural Heritage ES.

Inclusion of any associated traffic calming measures in the detailed design scheme under Planning Requirement 12 of the DCO.

- 3.10.3 **Policy:** Paragraphs 5.126 of the NPS requires the applicant to assess the significant heritage impacts of the proposed project.

Paragraph 5.131 of the NPS requires the Secretary of State to give great weight to the conservation of a designated heritage asset.

3.11 Hazlegrove Lane

- 3.11.1 **Hazlegrove House RPG Statement of Significance:** The Statement of Significance does not cover the remnants of the lost Hazlegrove Lane in the south-east field of the RPG (Peaked Close), possibly included with MM164 and an extension of MM163 in Appendix D.

The lane is depicted on the 1827 and 1848 Enclosure Maps of Queen Camel, and the 1888 First Edition OS, and remains the route of the PRoW. It can still be identified on the ground by clearly visible earthworks, the entrance to the copse, and the remains of an isolated parkland gate (with possible lias threshold and remnants of a veteran tree stump).

Figure 2.3, General Arrangement Plans Sheet 6 of 7: The proposed landscape scheme for the south-east field of the RPG (Peaked Close) does not retain the route or extant features of the former Hazlegrove Lane.

- 3.11.2 **Mitigation:** Assessment of the former route of Hazlegrove Lane in the Hazlegrove House RPG Statement of Significance and taken through to the DBA and ES with appropriate design, mitigation and enhancement measures.

Retention of the PRoW on its historic alignment where feasible.

Retention of the extant features and alignment of the former Hazlegrove Lane in the detailed design scheme approved under Planning Requirement 12 of the DCO and the landscaping scheme approved under Planning Requirement 5 of the DCO.

- 3.11.3 **Policy:** Paragraphs 5.126 of the NPS requires the applicant to assess the significant heritage impacts of the proposed project.

Paragraph 5.127 of the NPS requires the applicant to describe the significance of any heritage assets affected.

Paragraph 5.131 of the NPS requires the Secretary of State to give great weight to the conservation of a designated heritage asset.

Paragraph 4.20 of the NPS allows the Secretary of State to attach planning requirements for unresolved details.

South Somerset Adopted Local Plan (2006-2028): Policy EQ3 (Historic Environment) requires heritage assets to be conserved. All new development proposals relating to the historic environment will be expected to safeguard the significance of heritage assets.

3.12 **Hazlegrove House RPG Coppiced-Banked Track**

- 3.12.1 **Hazlegrove House RPG Statement of Significance:** The Statement of Significance does not cover the coppiced bank and ditch feature on the eastern boundary of the RPG, just north of the existing A303 at NGR ST 5994 2617. This feature extends to the south side of the A303 but neither section is identified on the Archaeological Aerial Survey Sheet.

The feature would be foreshortened by the realignment of the A303 and associated cutting and screen planting works.

3.12.2 **Mitigation:** Assessment of the bank and ditch feature in the Hazlegrove House RPG Statement of Significance and taken through to the DBA and ES with appropriate design, mitigation and enhancement measures.

3.12.3 **Policy:** Paragraphs 5.126 of the NPS requires the applicant to assess the significant heritage impacts of the proposed project.

Paragraph 5.127 of the NPS requires the applicant to describe the significance of any heritage assets affected.

Paragraph 5.131 of the NPS requires the Secretary of State to give great weight to the conservation of a designated heritage asset.

South Somerset Adopted Local Plan (2006-2028): Policy EQ3 (Historic Environment) requires heritage assets to be conserved. All new development proposals relating to the historic environment will be expected to safeguard the significance of heritage assets.

3.13 **Pond 5**

3.13.1 **Figure 2.3, General Arrangement Plans Sheet 6 of 7:** The scheme includes for Pond 5 to be located within the RPG, in a field historically known as Rawlins's Close. The field is on the north slope and foot of Camel Hill, surrounded by linear woodland, and has attractive and open views west to the Kingston Wood ridge. It was converted to arable farming in recent years but retains the majority of its historical boundaries and three veteran parkland trees.

The southern half and high ground of Rawlins's Close will be affected by the realigned A303, Camel Hill Link, Hazlegrove Junction underbridge, associated slip road, and realigned Hazlegrove House drive. The scheme has been concentrated in this area in an effort to minimise the harm to the RPG (paragraph 6.9.1 of the Chapter 6 Cultural Heritage ES).

The remaining area of Rawlins's Close is due to be reinstated to parkland as part of the mitigation measures, but this is compromised by the inclusion of Pond 5.

The pond is a considerable size, even as a dry scrape for much of the year, and is accompanied by fencing, a maintenance track and other works. Its location in Rawlins's Close would further diminish the area of the historic parkland and introduce an alien features into the RPG.

An alternative location in the adjacent field to the west would remove Pond 5 from the RPG and should be considered.

3.13.2 **Mitigation:** Relocation of Pond 5 outside of the RPG in the detailed design scheme approved under Planning Requirement 12 of the DCO and the landscaping scheme approved under Planning Requirement 5 of the DCO.

3.13.3 **Policy:** Paragraph 5.131 of the NPS requires the Secretary of State to give great weight to the conservation of a designated heritage asset.

Paragraph 4.20 of the NPS allows the Secretary of State to attach planning requirements for unresolved details.

South Somerset Adopted Local Plan (2006-2028): Policy EQ3 (Historic Environment) requires heritage assets to be conserved. All new development proposals relating to the historic environment will be expected to safeguard the significance and character of heritage assets.

3.14 **Veteran Trees in Rawlins's Close**

3.14.1 **Hazlegrove House RPG Statement of Significance, Tree Map & Figure 2.8 Environmental Masterplan Sheet 6 of 7:** Three veteran trees survive in Rawlins's Close. The proposals for these trees is unclear as only one appears on the Environmental Masterplan.

Paragraph 2.5.216 of Chapter 2 The Scheme: Furthermore, this area is proposed as an auxiliary compound and topsoil and materials storage area, but with no reference to retaining and protecting the three veteran trees.

The retention of all veteran tree is desirable as part of the surviving historic tree cover.

3.14.2 **Mitigation:** Retention of the three veteran trees as part of the parkland restoration for Rawlins's Close, including protection works during the construction period.

Inclusion of the veteran trees on the register of sensitive environmental features in the CEMP under Planning Requirement 3 of the DCO.

Retention of the veteran trees in the landscaping scheme under Planning Requirement 5 of the DCO.

3.14.3 **Policy:** Paragraph 5.131 of the NPS requires the Secretary of State to give great weight to the conservation of a designated heritage asset.

Paragraph 4.20 of the NPS allows the Secretary of State to attach planning requirements for unresolved details.

South Somerset Adopted Local Plan (2006-2028): Policy EQ3 (Historic Environment) requires heritage assets to be conserved. All new development proposals relating to the historic environment will be expected to safeguard the significance of heritage assets.

3.15 Highway Lighting for Hazlegrove Junction

3.15.1 **Figure 2.3, General Arrangement Plans Sheet 6 of 7; Paragraph 2.5.126 of Chapter 2 The Scheme; Paragraph 6.8.4 of Chapter 6 Cultural Heritage ES; & Figure 2.6 Proposed Lighting:** The blue-white glare of LED highway lights on the Hazlegrove Junction is likely to be intrusive to the southern end of the RPG when the lamps are on.

3.15.2 **Mitigation:** The siting of highway lighting columns on the north side of the roads so far as feasible and the use of lantern shields/hoods to prevent light glare intrusion into the RPG.

3.15.3 **Policy:** Paragraph 5.160 of the NPS requires careful consideration of materials and design for infrastructure.

3.16 Bunds 6 and 7

3.16.1 **Figure 2.3, General Arrangement Plans Sheet 6 of 7:** Bunds 6 and 7 are false cuttings to screen traffic on the A303 from the RPG but are not sufficiently high to screen HGVs, signage and lighting columns. These items are particularly noticeable elements of a road and will likely affect the character of the RPG.

The screening at the far south-east corner of the RPG is proposed to be provided by an environmental barrier with planting rather than an extension of Bund 7 with planting. This is an important point in the RPG boundary as it aligns with the outward approach on the Hazlegrove drive. An environmental barrier in this prominent position would diminish the character and appearance of the RPG.

An increase in the height of the bunds and an extension of Bund 7 would assist in removing the visibility of highway features from within the RPG. Cross sections through these areas would be helpful in explaining the proposed landforms and effective screening.

3.16.2 **Mitigation:** Increase in height of Bunds 6 and an extension of Bund 7, as a substitute to the proposed environmental barrier, in the detailed design

scheme approved under Planning Requirement 12 of the DCO and the landscaping scheme approved under Planning Requirement 5 of the DCO.

- 3.16.3 **Policy:** Paragraph 5.131 of the NPS requires the Secretary of State to give great weight to the conservation of a designated heritage asset.

Paragraph 4.20 of the NPS allows the Secretary of State to attach planning requirements for unresolved details.

South Somerset Adopted Local Plan (2006-2028): Policy EQ3 (Historic Environment) requires heritage assets to be conserved. All new development proposals relating to the historic environment will be expected to safeguard the character of heritage assets.

3.17 Hazlegrove House RPG Driveway Realignment

- 3.17.1 **Figure 2.3, General Arrangement Plans Sheet 6 of 7:** The realigned drive from the existing surface water drainage pond to the new entrance curves around the pond and is then a straight line. Whilst straight sections are a feature of the last manifestation of the drive, it's important for the alignment to respond to the landform and proximity of parkland features, such as the retained southern copse.

The realigned drive would also pass close to the existing pond and a veteran tree and will requires extensive groundworks.

The new drive alignment should maintain a naturalised synergy between the direction and the surrounding landform and avoid potential damage to veteran tree root systems. Cross sections through the existing pond area would be helpful in explaining the proposed landforms.

- 3.17.2 **Mitigation:** Redesign of the new alignment for the Hazlegrove House drive in the detailed design scheme approved under Planning Requirement 12 of the DCO and the landscaping scheme approved under Planning Requirement 5 of the DCO.
- 3.17.3 **Policy:** Paragraph 5.131 of the NPS requires the Secretary of State to give great weight to the conservation of a designated heritage asset.

Paragraph 4.20 of the NPS allows the Secretary of State to attach planning requirements for unresolved details.

South Somerset Adopted Local Plan (2006-2028): Policy EQ3 (Historic Environment) requires heritage assets to be conserved. All new development

proposals relating to the historic environment will be expected to safeguard the character of heritage assets.

3.18 **Hazlegrove House RPG Restoration and Conservation Management Plans**

- 3.18.1 **Paragraphs 6.8.3, 6.9.1, 6.9.3 & 6.13.1 of Chapter 6 Cultural Heritage ES:** The Cultural Heritage ES identifies the design and mitigation measures proposed in response to the adverse effects on the Hazlegrove House RPG. These measures respond to individual issues but do not address the overall harm to the RPG from the permanent loss of approximately 14% of the RPG and further encroachment of the A303.

Part of the mitigation includes for the reinstatement of parkland grazed grass land and specimen tree planting in the area which is currently arable farmland. However, the DCO does not include a historic landscape conservation management plan for this area or the remainder of the RPG. A conservation management plan for the whole RPG would help mitigate the permanent harm to the RPG.

The Outline Environmental Management Plan include a requirement for a Landscape and Ecological Management Plan, but this will be limited to a materials and workmanship specification for the hard and soft landscape works. It will not cover the history, development, and surviving state of the RPG and how this understanding of the significance will influence management principles and decisions on restoration, replacement and day-to-day management.

- 3.18.2 **Mitigation:** A planning requirement in the DCO for the preparation and implementation of a conservation management plan for the RPG approved by Secretary of State in consultation with the local planning authority.
- 3.18.3 **Policy:** Paragraph 5.131 of the NPS requires the Secretary of State to give great weight to the conservation of a designated heritage asset.

Paragraph 4.20 of the NPS allows the Secretary of State to attach planning requirements for unresolved details.

South Somerset Adopted Local Plan (2006-2028): Policy EQ3 (Historic Environment) requires heritage assets to be conserved. All new development proposals relating to the historic environment will be expected to safeguard the significance and character of heritage assets.



A303 Sparkford to Ilchester Dualling Scheme
PINS Reference: TR010036

Local Impact Report
Appendix 2
Landscape Topic Paper

A303 SPARKFORD TO ILCHESTER DUALLING SCHEME
APPENDIX 2
Landscape Topic Paper

1. PURPOSE OF TOPIC PAPER

- 1.1. The purpose of this topic paper is to set out in further detail issues in relation to Landscape that have been raised in the Local Impact Report.

2. BACKGROUND

- 2.1 The dualling scheme is generally an on-line solution, with the maximum off-set typically 100 metres north or south. It has been designed to minimise its impact on key views and landscape character through extensive screening measures; notably planting, cuttings, and false cuttings.
- 2.2 Modern highway design standards and the separation of local and strategic traffic requires a scheme of greater complexity and reach than the 5.6 km of new dual carriageway. The dualled route is accompanied by parallel access roads, link roads, bridges and junctions, which significantly broadens the 'road corridor' and the scale of the mitigation works.
- 2.3 The mitigation works have been carefully considered to counter local effects. Chapter 7, the Environmental Statement (ES) for Landscape, reports on where the scheme will have significant adverse effects on the landscape character or the visual amenity (represented by visual receptors) after mitigation measures. These findings are supported with the exception for the outcomes for five of the receptors. These cases are detailed in section 3.
- 2.5 Observations are also raised on the proposed designs for new structures and for the landscape and highway elements.
- 2.5 The overall impact will inevitable be an inward looking green corridor along the hill top that physically and visually divides the landscape.

3. ISSUES

3.1 Visual Receptors Nos. 14 and 17

- 3.1.1 **Appendix 7.2 Landscape Character Area; Table 1.1 of Appendix 7.4 Visual baseline and impact schedules; & Figure 2.8 Environmental Masterplan Sheet 4 of 7:** Visual Receptors No. 14 and No. 17 are on the green track of Slate Lane. This Road Used as a Public Path (RUPP) runs over the crest of West Camel Hill and offers occasional and stunning panoramic vistas both north and south through gaps in the linear boundary planting or at field gate opening, as identified in the landscape Character Area sheet

(Appendix 7.2) and the Visual baseline and impact schedules (Appendix 7.4). The LCA sheet for the LCA1 West Camel Hill identifies that “*some long distance views can be afforded within the area from high vantage points on West Camel Hill, Steart Hill and Camel Hill*”. The baseline view in the impact schedules for VR No. 14 is described as affording ‘*long distance open views across falling arable farmland*’ and ‘*A vast undulating landscape forms the background to the view*’. The baseline view for VR No. 17 is described as having ‘*long distance open views of gently undulating farmland with pockets of built form*’.

The scheme will bring the Steart Hill Link and Downhead Junction Link roads in close proximity to Slate Lane and introduce an extensive belt of screen planting in the foreground. This linear belt of planting will not only screen the realigned A303 and its link roads but also remove all opportunities to appreciate the stunning long distance views of the vast undulating landscape to the south. This permanent effect is not assessed in the impact schedules.

For VR No. 14 the assessment of the effects during the initial operation identifies that ‘*The vast, long distance view beyond the proposed scheme would remain in line with the baseline view*’. However, there is no assessment on the effects on the vast, long distance view for the 15-year period once the extensive screen planting is established.

For VR No. 17 there is no assessment of the long distance views during operation.

The Environmental Masterplan indicates that all panoramic vistas from Slate Lane would be lost.

- 3.1.2 **Mitigation:** Reassessment of VR No. 14 and VR No. 17 with an assessment of the effects from the loss of the vast, long distance view for the 15-year period.

Inclusion of measures for retaining long distance panoramic views from Slate Lane in the detailed design scheme approved under Planning Requirement 12 of the DCO and the landscaping scheme approved under Planning Requirement 5 of the DCO.

This could be achieved with gaps in the screen planting to the Downhead Junction Link and Steart Hill Link roads and/or advantage points off Slate Lane to allow for the continued appreciate the panoramic views.

- 3.1.3 **Policy:** Paragraph 4.20 of the NPS allows the Secretary of State to attach planning requirements for unresolved details.

Paragraph 5.145 of the NPS requires the assessment to include any significant effects on landscape character.

Paragraph 5.146 of the NPS requires the assessment to include potential impacts on views and visual amenity.

South Somerset Adopted Local Plan (2006-2028): Policy EQ2 (General Development) requires “development to be designed to achieve a high quality, which . . . preserves or enhances the character and appearance of the district”. Developments will be considered against, inter alia, conserving and enhancing the landscape character of the area.

3.2 **Visual Receptor No. 25**

3.2.1 **Table 1.1 of Appendix 7.4 Visual baseline and impact schedules & Figure 2.8 Environmental Masterplan Sheet 5 of 7:** Visual Receptors No. 25 is assessed to have a ‘Neutral’ effect for the construction and operation periods due to views of the A303 being obscured by intervening rising landform.

This assessment is challenged as the boundary hedge to the A303 is visible on the horizon, as are HGVs and vans above the hedgerow.

Enhanced planting or a false cutting (on the site of the CBGM Auxiliary compound and storage area G) would screen the scheme from Wales.

3.2.2 **Mitigation:** Reassessment of VR No. 25.

Inclusion of measures for enhanced screening of the A303 from Wales in the detailed design scheme approved under Planning Requirement 12 of the DCO and the landscaping scheme approved under Planning Requirement 5 of the DCO.

3.2.3 **Policy:** Paragraph 5.146 of the NPS requires the assessment to include potential impacts on views and visual amenity.

Paragraph 5.149 of the NPS requires projects to be designed carefully, taking account of the potential impact on the landscape.

Paragraph 4.20 of the NPS allows the Secretary of State to attach planning requirements for unresolved details.

South Somerset Adopted Local Plan (2006-2028): Policy EQ2 (General Development) requires “development to be designed to achieve a high quality, which . . . preserves or enhances the character and appearance of the district”. Developments will be considered against, inter alia, conserving and enhancing the landscape character of the area.

3.3 **Visual Receptor No. 28**

- 3.3.1 **Table 1.1 of Appendix 7.4 Visual baseline and impact schedules & Figure 2.8 Environmental Masterplan Sheet 5 of 7:** The rising ground of a modern bund currently restricts views of the A303. The scheme will move the alignment of the A303 to the north and closer to Camel Hill Farm and the other adjacent residential receptors. The scheme will make use of a 2 metre high environmental barrier to screen the construction and operational traffic with planting by Year 15 assisting with the screening of HGVs.

The assessment of 'Slight Adverse', 'Neutral' and 'Neutral' is agreed for the construction phase, Year 1 and Year 15, respectively, with regards to the intrusion of moving traffic, but does not consider the harmful effect of an environmental barrier on the rural character of the farmstead setting.

A 2 metre high environmental barrier could diminish the rural setting for this attractive historic farmstead. Consideration should be given to using a false bund or retained bank to screen the moving traffic rather than an environmental barrier.

- 3.3.2 **Mitigation:** Reassessment of VR No. 28 with consideration of the effects of an environmental barrier on the rural character.

Inclusion of a bund in the detailed design scheme approved under Planning Requirement 12 of the DCO and the landscaping scheme approved under Planning Requirement 5 of the DCO.

- 3.3.3 **Policy:** Paragraph 5.145 of the NPS requires the assessment to include any significant effects on landscape character.

Paragraph 5.149 of the NPS requires projects to be designed carefully, taking account of the potential impact on the landscape.

Paragraph 4.20 of the NPS allows the Secretary of State to attach planning requirements for unresolved details.

South Somerset Adopted Local Plan (2006-2028): Policy EQ2 (General Development) requires "development to be designed to achieve a high quality, which . . . preserves or enhances the character and appearance of the district". Developments will be considered against, inter alia, conserving and enhancing the landscape character of the area.

South Somerset Adopted Local Plan (2006-2028): Policy EQ3 (Historic Environment) requires heritage assets to be conserved. All new development proposals relating to the historic environment will be expected to safeguard the setting of heritage assets.

3.4 Visual Receptor No. 38

- 3.4.1 **Table 1.1 of Appendix 7.4 Visual baseline and impact schedules & Figure 2.8 Environmental Masterplan Sheet 6 of 7:** The view from VR No. 38 is from the Hazlegrove House drive, on the outward approach before it bends onto a new alignment. It is the closest point of the drive to the A303 realignment. Views of moving traffic and highway lighting on the A303 will be screened in part by the false cutting of Bund 7 and in part by a 2 metre high environmental barrier.

The assessment of the effects of the scheme on VR No. 38 are 'Very Large Adverse', 'Moderate Adverse', and 'Slight Adverse' for the construction phase, Year 1 and Year 15, respectively. The assessment of Slight Adverse is challenged as this does not consider the adverse effect of an environmental barrier on the character of the RPG.

The environmental barrier would be on the sight line from the Hazlegrove House drive, be in close proximity to the drive, would not be in keeping with the character of the RPG, and is likely to be visible through the planting particularly in autumn, winter and early spring months.

Consideration should be given to an extension of Bund 7 as a substitute for the proposed 2 metre high environmental barrier.

- 3.4.2 **Mitigation:** Reassessment of VR No. 38 with the intrusive nature of a 2 metre fence consider in the RPG considered in the assessment.

Extension of Bund 7, as a substitute for the proposed environmental barrier, in the detailed design scheme approved under Planning Requirement 12 of the DCO and the landscaping scheme approved under Planning Requirement 5 of the DCO.

- 3.4.3 **Policy:** Paragraph 5.145 of the NPS requires the assessment to include any significant effects on landscape character.

Paragraph 5.146 of the NPS requires the assessment to include potential impacts on views and visual amenity.

Paragraph 5.149 of the NPS requires projects to be designed carefully, taking account of the potential impact on the landscape.

Paragraph 4.20 of the NPS allows the Secretary of State to attach planning requirements for unresolved details.

South Somerset Adopted Local Plan (2006-2028): Policy EQ3 (Historic Environment) required heritage assets to be conserved. All new development proposals relating to the historic environment will be expected to safeguard the character of heritage assets.

3.5 **Design of Highway and Landscape Elements**

3.5.1 **Paragraphs 2.5.166 and 2.5.168 of Chapter 2 The Scheme:** Confirmation of the design and materials for the highway and landscape features are required, i.e. the acoustic barriers, fences, gates, access road and track surfaces.

3.5.2 **Mitigation:** Inclusion of details for hard landscaping works in the landscaping scheme approved under Planning Requirement 5 of the DCO.

3.5.3 **Policy:** Paragraph 5.149 of the NPS requires projects to be designed carefully, taking account of the potential impact on the landscape.

Paragraph 5.160 of the NPS requires careful consideration of materials and design for infrastructure.

Paragraph 4.20 of the NPS allows the Secretary of State to attach planning requirements for unresolved details.

3.6 **Bridge Designs**

3.6.1 **Paragraphs 2.5.118 and 2.5.123 of Chapter 2 The Scheme; Figure 2.5; and Figure 2.17:** The proposed overbridge and underbridge for the scheme vary in form from the existing bridges on this section of the A303 by being supported on abutments rather than slender piers. This introduces a new form of bridge design with substantial elements of concrete facing panels.

The current designs are not considered to reflect the character of the local landscape or that of this section of the A303 corridor.

Their designs should respond to the form of the existing A303 bridges or to the character of the local landscape, which could be through the use of the local Camel Stone, notably in the wall facings.

3.6.2 **Mitigation:** Redesign of the bridges with a response to the character of the local landscape or road corridor in the detailed design scheme approved under Planning Requirement 12 of the DCO.

3.6.3 **Policy:** Paragraph 5.149 of the NPS requires projects to be designed carefully, taking account of the potential impact on the landscape.

Paragraph 5.160 of the NPS requires careful consideration of materials and design for infrastructure.

Paragraph 4.20 of the NPS allows the Secretary of State to attach planning requirements for unresolved details.

South Somerset Adopted Local Plan (2006-2028): Policy EQ2 (General Development) requires “development to be designed to achieve a high quality, which promotes South Somerset’s local distinctiveness and preserves or enhances the character and appearance of the district”.



A303 Sparkford to Ilchester Dualling Scheme
PINS Reference: TR010036

Local Impact Report
Appendix 3
Biodiversity, Ecology and Natural Environment Topic Paper

A303 SPARKFORD TO ILCHESTER DUALLING SCHEME

APPENDIX 3

Biodiversity, Ecology and Natural Environment Topic Paper

1. PURPOSE OF TOPIC PAPER

- 1.1. The purpose of this topic paper is to set out in further detail issues in relation to biodiversity and ecology that have been raised in the Local Impact Report.

2. BACKGROUND

- 2.1 The proposed scheme is to provide a continuous dual-carriageway linking the Podimore Bypass and the Sparkford Bypass. The scheme would involve the removal of at-grade junctions and direct accesses. The Hazlegrove Junction would be constructed to grade-separated standards and Downhead Junction and Camel Cross Junction would be constructed to compact grade-separated standards, as illustrated on Figure 2.3 General Arrangement Plans, contained in Volume 6.2.
- 2.2 Chapter 8, Volume 6.3 the Environmental Statement and its supporting appendices considers the likely significant effects of the proposed scheme on important ecological resources including designated sites, habitats and species.
- 2.3 On reviewing these documents a number of issues have been identified including the need for further surveys, analysis and assessment, and inclusion of further mitigation. On occasion there is a lack of consultation on specific features where data and information should have been accessed from local ecologists and organisations. This will need to be included an updated Environmental Statement to provide a more comprehensive assessment or detailed measures be included but not exclusively within the Construction Environmental Management Plan. The identified issues where further information, assessment and or mitigation are:
 - Evidence of sufficient biodiversity mitigation / enhancement being provided
 - Effects on bats and their foraging habitats
 - Loss and fragmentation of habitat connectivity for bats
 - Bat roost provision
 - Disturbance to bat species whilst occupying a place of rest
 - Lighting effects on biodiversity
 - Ecological networks (generic)
 - Species mortality
 - Air quality effects on priority habitats
 - Effects on Barn Owls and their habitats
 - Breeding birds
 - Consideration of Hazel Dormice
 - Consideration of Great Crested Newts
 - Invertebrate survey and assessment

- Consideration of Brown Hairstreak Butterfly
- Environmental Masterplan

2.4 It is also noted generally that none of the submitted reports state the surveyors and their competencies as per the Chartered Institute of Ecology and Environmental Management guidelines of ecological impact assessment¹.

3. ISSUES

Evidence of sufficient biodiversity mitigation / enhancement being provided

Background

- 3.1 It is considered that there is insufficient evidence provided by the applicant to show that the scheme would not result in a net loss of habitat value.
- 3.2 6.1 Environmental Statement - Chapter 8: Biodiversity_ 8.10.9 Sets out the loss of habitats, including priority habitats during construction. The loss of hedgerows and woodland is particularly concerning. 8.10.58 sets out the amount of replacement / compensation for priority habitats for operational use. However, no consideration has been made for the timeframes to allow habitats to mature / support biodiversity.
- 3.3 6.3 Environmental Statement Appendix 8.3 Hedgerow Technical Report_- The impacts on hedgerow include loss, fragmentation between hedgerows (and woodlands – not mentioned) and severance of wildlife corridors. Approximately 2.8 kilometres would be permanently lost, and 7.7 kilometres would be a temporarily lost. Of the 10.6 kilometres of hedgerow likely to require removal, approximately 6 kilometres is species-rich, with 4.6 kilometres 'important' under the *Hedgerow Regulations 1997*². Approximately 1663 metres of species rich hedgerow and 1174 metres of species poor hedgerow would be permanently lost. A total of 1.8 kilometres of species-poor hedgerow would be replaced with species rich hedgerow.
- 3.4 6.3 Environmental Statement Appendix 8.4 Bat Technical Report_states that 'It is proposed that 4.57 hectares of woodland and 22.43 hectares of native trees and scrub are to be planted to compensate for the loss of these habitats as a result of construction and operation of the scheme. It has been recommended that compensatory woodland planting is incorporated into the Environmental Masterplan (Figure 2.8 of the Environmental Statement, Volume 6.2), with at least 1 tree planted for every 1 removed, with more incorporated into the design where possible'.

1

https://www.cieem.net/data/files/Publications/EcIA_Guidelines_Terrestrial_Freshwater_and_Coastal_Jan_2016.pdf

² The hedgerows were identified and mapped in accordance with the Hedgerow Regulations 1997. Although the methodology mentions woody species, ground flora and associated species, it fails to mention the potential for archaeological / historical features present, or where a hedgerow would qualify due to records of certain species being present listed in the Regulations.

- 3.5 For newly planted trees opportunities for roosting bats would not occur although this can be mitigated through the erection of bat boxes, if the trees are of sufficient firmness to support such in newly planted areas. However, a newly planted tree will not provide as much prey resource for bats as a mature tree for many years. This may affect the maintenance of the Favourable Conservation Status of local bat populations.

Mitigation

- 3.6 Defra's Biodiversity offsetting metric or Somerset's Habitats Evaluation Procedure should be used to calculate the equivalent amount of habitat needed to replace that lost during construction. Both methods include temporal and risk factors and are compatible with each other. This would then give confidence that the landscaping associated with the proposed road scheme provides sufficient mitigation and indeed provide enhancement. Where mitigation is insufficient the appropriate amount and type should be added to the scheme either on or off site. Furthermore, the scheme should show a resultant enhancement for biodiversity including through habitat creation. This could then be included in an updated Environmental Statement.
- 3.7 With regard to bats and trees proposals state that trees will be replaced on a one for one basis. At least three trees should be replanted for each tree lost to achieve net gain and to account for natural losses. This should be specified in a updated landscape strategy / plan.

Policy

- 3.8 The National Policy Statement for National Networks 2014 (NPS) states in Paragraph 5.25 that 'The applicant may also wish to make use of biodiversity offsetting in devising compensation proposals to counteract any impacts on biodiversity which cannot be avoided or mitigated.'
- 3.9 Paragraph 5.20 of the NPS mentions that 'Government policy for the natural environment is set out in the Natural Environment White Paper (NEWP). The NEWP sets out a vision of moving progressively from net biodiversity loss to net gain.'
- 3.10 This has been taken forward in the more recent National Planning Policy Framework 2018 (NPPF) of which paragraph 170 states: 'Planning... decisions should contribute to and enhance the natural and local environment by... minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures'.
- 3.11 The South Somerset District Council adopted Local Plan policy EQ4 states that 'All proposals for development... will: Maximise opportunities for... enhancement and connection of natural habitats...' Adopted Local Plan Policy EQ6: Woodland and Forests states 'Woodland areas, including ancient and semi-natural

woodland should be... expanded where possible to provide a buffer to core areas of woodland' Targets for the policy include a net increase in area.

Effects on bats and their foraging habitats

Background

- 3.12 6.3 Environmental Statement Appendix 8.4 Bat Technical Report -_Most of the activity recorded across the transect surveys were dominated by common pipistrelle and soprano pipistrelle. With Leisler's bat, noctule and serotine mainly recorded adjacent to open areas and noted to be foraging. Large numbers of *Myotis sp.* were also recorded across the transect surveys. Brown long-eared bat were recorded more occasionally, although likely to be under recorded, and occasional passes from rare bat species such as barbastelle, and lesser horseshoe were also recorded during transect surveys.
- 3.13 It is noted that no internal surveys of the four woodlands affected by the proposed development, for woodland foraging species such as Bechstein's bat, lesser horseshoe bat, etc, have been undertaken.
- 3.14 The terms of reporting low, moderate and high levels of bat activity are not defined per species considering each one's spatial ecology.
- 3.15 There would be the permanent loss of the following foraging habitats, which may be used by bats for foraging purposes:
- Arable land – 7.23 hectare
 - Poor semi-improved grassland – 7.20 hectare
 - Broadleaved plantation woodland – 0.06 hectare
 - Broadleaved semi-natural woodland – 0.60 hectare
 - Broadleaved parkland scattered trees – 0.03 hectare
 - Improved grassland – 3.92 hectare
- 3.16 In the Enhancement (not Mitigation?) section of the report it states that 'To compensate for the loss of suitable foraging habitats within the survey area, it is recommended that wildflower grassland is planted, comprising of species also associated with calcareous and neutral grassland. It is proposed that 49.01 hectares of wildflower and species rich grassland would be planted as compensatory grassland planting for habitat lost during construction and operation of the scheme'.

Mitigation

- 3.17 The results in the Environmental Statement need to be clarified for each transect are described for all species rather than describing the use of the transects per species, which would have resulted in a clearer picture of where and what each species is doing along the route of the proposed dualling. The results of the automated detector surveys could then be combined with those of the transect surveys. The impacts on each species' local population should then be considered and analysed. Figures could also be included in the text to illustrate

this per species. More effort needs to go into identifying the various *Myotis* species which have differing habitat requirements (for example see Barataud, 2015³). The assessment can then demonstrate that the scheme will or will not have an effect on the 'Favourable Conservation Status' of local populations.

- 3.18 Further bat activity surveys of woodland affected by the proposed scheme need to be carried out, reported and analysed in an updated Environmental Statement
- 3.19 Compensatory planting should be of a minimum area equal to the area to be lost as a result of the scheme. However, this may not be sufficient to mitigate habitat lost. The value of the habitat area lost should be calculated using either Somerset's Habitat Evaluation Procedure or Defra's Biodiversity offsetting metric (depending on the distribution of bat species), which includes temporal and difficulty/risk factors for the habitats created. The calculation should also allow for the effects of street lighting on the woodland planting at the Hazelgrove Junction (Figure 2.8, Sheet 7) and therefore should be excluded from the amount provided to bats.

Policy

- 3.20 The NPS states in Paragraph 5.34 that 'Many individual wildlife species receive statutory protection under a range of legislative provisions'. With regard to bats this includes the Conservation of Habitats and Species Regulations 2017 regarding European protected species of which Regulation 43 makes it an offence to deliberately disturb wild animals, listed on Schedule 2, in such a way as to be likely to:
 - a) impair their ability—
 - (i) to survive, to breed or reproduce, or to rear or nurture their young; or
 - (ii) in the case of animals of a hibernating or migratory species, to hibernate or migrate; or
 - (b) affect significantly the local distribution or abundance of the species to which they belong
- 3.21 Section 99 of the Government circular 2005/06 on biodiversity and geological conservation states that '*It is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision.*'
- 3.22 Paragraph 5.20 of the NPS mentions that 'Government policy for the natural environment is set out in the Natural Environment White Paper (NEWP). The NEWP sets out a vision of moving progressively from net biodiversity loss to net gain.' This has been taken forward in the more recent National Planning Policy Framework 2018 (NPPF) of which paragraph 170 states: 'Planning... decisions

³ Barataud, M. 2015. *Acoustic Ecology of European Bats: Species Identification, Study of their Habitats and Foraging Behaviour*. Paris: Muséum nationale d'Histoire naturelle

should contribute to and enhance the natural and local environment by... minimising impacts on and providing net gains for biodiversity...'

- 3.23 The South Somerset District Council adopted Local Plan policy EQ4 states that 'All proposals for development... will: Protect and assist recovery of identified priority species; and Ensure that Habitat Features, Priority Habitats and Geological Features that are used by bats and other wildlife are protected and that the design including proposals for lighting does not cause severance or is a barrier to movement.

Loss and fragmentation of habitat connectivity for bats

Background

- 3.24 6.3 Environmental Statement Appendix 8.4 Bat Technical Report - Numerous important commuting corridors were identified, mainly to the north of the existing A303, with more limited numbers south of the existing road. A potential important crossing point was also identified south of Steart Wood, approximately 220 metres west of Conegore Corner, and recorded as being utilised by common and rare species of bat, including barbastelle, greater horseshoe bat and lesser horseshoe bat (Bechstein's must also assumed to be present given that there is a lack of analysis of *Myotis* species). High levels of foraging activity were noted in the fields and woodland edges at the entrance of Hazlegrove School, with an array of common species recorded.
- 3.25 Ten bat species were recorded during the crossing point surveys undertaken between July and October 2017 using hedgerows and treelines for commuting purposes. These comprised:
- Lesser horseshoe
 - *Myotis* sp.
 - Leisler's bat
 - Noctule
 - *Pipistrellus* sp.
 - Common pipistrelle
 - Soprano pipistrelle
 - Serotine
 - Brown long-eared
 - Barbastelle
- 3.26 It is proposed to install bat hop-overs to reduce the impact of hedgerow severance where this cannot be avoided, and to reduce the impact of temporary loss or severance of hedgerows during construction. In order to reduce the impact of the scheme, particularly with regards to collisions of vehicles.
- 3.27 At Canegore Corner it is additionally suggested that a dense shrub layer should be planted along the verge to discourage bats from crossing the road low down, forcing them up and over the road, away from traffic. The presence of bat species known to fly through vegetation, such as brown long-eared bat, greater

horseshoe bat, lesser horseshoe bat, means that wooden screen/mesh is also recommended to be installed alongside the dense shrub. It is also stated that the scheme constructed at the bottom of this verge in a false cutting. This elevated verge will further encourage bats to fly up and over the road. I consider this would not work as those bats would still drop to 1 to 2m above ground level.

- 3.28 However, with regard to planted hop-overs, it is unlikely Highways England would want the maintenance issue of trees close to the highway. Hop-overs are unlikely to work for horseshoe, *Myotis* and other species which are likely to drop immediately to cross the carriageway, which is wider than normal estate roads.
- 3.29 Lack of cross connectivity of the proposed dual carriageway for some bats species is potentially an issue and increases the risk of mortality when linked with the increased width of the highway. There is no effective mitigation proposed for bats crossing the operational A303.
- 3.30 Crossing point surveys aimed to inform the impact assessment in relation to potential fragmentation of bat foraging and commuting habitat, and direct mortality. The methodology was in accordance with Berthinussen and Altringham (2015)⁴ that requires at least 6 visits per crossing point location. Twelve crossing point survey locations were identified based on assessment of mature hedgerows with good connectivity, woodland blocks, and riparian habitats likely to be important for commuting and foraging bats impacted by the scheme. Of these twelve survey locations, eleven were used due to health and safety constraints. Surveys were conducted from July 2017 until September 2017.
- 3.31 The consultants considered surveying in June to be wasted effort. This was so that surveys would correspond with the preferred route announcement from July to minimise wasted survey effort. However, it is considered it is the existing A303 that is being assessed not the proposed dualling and therefore the effort is not considered to be wasted as stated by the consultants.
- 3.32 Results were also assessed after the second survey to determine whether the crossing point required the full 6 surveys. This does not take account of the seasonal variation in prey availability and habitat use by some species of bats, e.g. horseshoe species. I have found spring and autumn peaks at certain locations for horseshoe bats where they are absent or in low number through the summer for example.
- 3.33 No thermal imaging cameras of potential crossing points were deployed in the surveys as included in the Berthinussen and Altringham (2015) methodology. At

⁴ Berthinussen, A. & Altringham, J. 2015. WC1060 Development of a Cost-Effective Method for Monitoring the Effectiveness of Mitigation for Bats Crossing Linear Transport Infrastructure.
<http://sciencesearch.defra.gov.uk/Default.aspx?Menu=Menu&Module=More&Location=None&Completed=0&ProjectID=18518>

this stage it is considered that the survey effort is not sufficient to determine bats crossing the existing A303.

Mitigation

- 3.34 Further surveys for a full season and with thermal imaging cameras is required to determine how the existing A303 is being crossed by bats.
- 3.35 The results should describe the use of the transects per species, which would result in a clearer picture of where and what each species is doing along the route of the proposed dualling. The results of the automated detector surveys could then be combined with those of the transect surveys. The impacts on each species' local population could then be considered. Figures could also be included in the text to illustrate this per species. More effort needs to go into identifying the various *Myotis* species. The assessment can then demonstrate that the scheme will or will not have an effect on the 'Favourable Conservation Status' of local populations. This should then be included in an updated Environmental Statement.
- 3.36 A 'green bridge' considered at Canegore Corner (see Berthinussen and Altringham, 2015) and elsewhere underpasses of appropriate dimensions are provided as part of the proposed scheme whilst there is opportunity and for future proofing. These need to be identified, designed and included in construction drawings.

Policy

- 3.37 The NPS states in Paragraph 5.34 that 'Many individual wildlife species receive statutory protection under a range of legislative provisions'. With regard to bats this includes the Conservation of Habitats and Species Regulations 2017 regarding European protected species of which Regulation 43 makes it an offence to deliberately disturb wild animals, listed on Schedule 2, in such a way as to be likely to:
- a) impair their ability—
 - (i) to survive, to breed or reproduce, or to rear or nurture their young; or
 - (ii) in the case of animals of a hibernating or migratory species, to hibernate or migrate; or
 - (b) affect significantly the local distribution or abundance of the species to which they belong
- 3.38 The NPS state in paragraph 5.33, 'Development proposals potentially provide many opportunities for building in beneficial biodiversity or geological features as part of good design. When considering proposals, the Secretary of State should consider whether the applicant has maximised such opportunities in and around developments. The Secretary of State may use requirements or planning obligations where appropriate in order to ensure that such beneficial features are delivered.'
- 3.39 The NPS states in Paragraph 5.36 'Applicants should include appropriate mitigation measures as an integral part of their proposed development, including

identifying where and how these will be secured. In particular, the applicant should demonstrate that:

- developments will be designed and landscaped to provide green corridors and minimise habitat fragmentation where reasonable;
- opportunities will be taken to enhance existing habitats and, where practicable, to create new habitats of value within the site landscaping proposals, for example through techniques such as the 'greening' of existing network crossing points, the use of green bridges and the habitat improvement of the network verge

3.40 The South Somerset District Council Local Plan policy EQ4 states 'All proposals for development..., will... promote coherent ecological networks'; 'Maximise opportunities for restoration, enhancement and connection of natural habitats'; and '... assist [the] recovery of identified priority species'. It also states that 'All proposals for development... will: Protect and assist recovery of identified priority species; and Ensure that Habitat Features, Priority Habitats and Geological Features that are used by bats and other wildlife are protected and that the design including proposals for lighting does not cause severance or is a barrier to movement'.

Bat roost provision

3.41 6.3 Environmental Statement Appendix 8.4 Bat Technical Report. There is a loss of roosts for bats including one house that would be demolished by the construction of the proposed road. To mitigate for the loss of the roosting resource, the installation of a bat house within suitable habitat is recommended. A bat house would aim to replace the potential roost lost and enhance the site for species such as lesser horseshoe and serotine which have been recorded and are less likely to use tree roost boxes. The report recommends bat houses that are at least 60 centimetres tall and have chambers that are at least 50 centimetres tall and 35 centimetres wide. They also require a landing area which extends below the entrance of at least 8 centimetres, although recessed partitions are also an acceptable option. At least 4 roosting chambers should be constructed inside the bat houses, with roost partitions spaces approximately 2.5 centimetres apart. The bat house should be installed between 3.5 metres and 6 metres high on a sturdy pole secured into the ground. However, these roosts would not be suitable for lesser horseshoe bats.

3.42 The report also considers that to ensure that the scheme has a positive contribution towards local bat populations, the report recommends that a minimum of 220 bat boxes are installed within suitable habitats adjacent to the scheme. However, it is not certain where this figure comes from, as seemingly a 'scatter gun' approach, and which bat populations this would benefit.

Mitigation

- 3.43 Further analysis in the Environmental Statement as to roosting requirements of bats and consideration of provision for horseshoe species. Bat houses should be considered in place of boxes and the afore described pole mounted house, which is likely to be a better long-term investment.

Policy

- 3.44 The NPS states in Paragraph 5.34 that 'Many individual wildlife species receive statutory protection under a range of legislative provisions'. With regard to bats this includes the Conservation of Habitats and Species Regulations 2017 regarding European protected species of which Regulation 43 makes it an offence to deliberately disturb wild animals, listed on Schedule 2, in such a way as to be likely to:
- a) impair their ability—
 - (i) to survive, to breed or reproduce, or to rear or nurture their young; or
 - (ii) in the case of animals of a hibernating or migratory species, to hibernate or migrate; or
 - (b) affect significantly the local distribution or abundance of the species to which they belong
- 3.45 The South Somerset District Council Local Plan policy EQ4 states 'All proposals for development... will: Protect and assist [the] recovery of identified priority species'.

Disturbance to bat species whilst occupying a place of rest

Background

- 3.46 6.3 Environmental Statement Appendix 8.4 Bat Technical Report - A total of 33 trees were assessed as being of high potential to support roosting bats within 120 metres of the scheme. A further 12 trees within 40 metres of the scheme were assessed as being of moderate potential to support roosting bats. A total of 11 low potential trees were within the boundary of the scheme. Of the 9 species recorded during these surveys, tree roosts were identified as belonging to brown long-eared bat, common pipistrelle, *Myotis sp.* and soprano pipistrelle, with a total of 8 trees recorded as being used as roosts. The largest of these was a roost of 38 *Myotis sp.* bats within one tree.
- 3.47 As a result of this assessment, 38 buildings were identified as being of either high potential and within 120 metres of the scheme or of moderate potential within 40 metres of the site. Of these 38 buildings, four could not be surveyed as land owners denied access to the buildings. Consequently, 34 buildings were subject to emergence re-entry survey between May and October 2017. Of the species recorded during the emergence and re-entry surveys of buildings, roosts were identified within buildings belonging to brown long-eared bat, common pipistrelle, *Pipistrellus sp.* and soprano pipistrelle, potential roosts belonging to common pipistrelle and serotine were also recorded.
- 3.48 The report considers that to reduce any impact from increased levels of disturbance from light, noise and vibration throughout construction and during

operation of the scheme, it is recommended that a 10-metre buffer zone is observed around hedgerows and woodland, and where bat roosts have been identified. There are five roosts within 30m. However, no evidence is given for the buffered distances. It is considered that the effects of disturbance from road construction on roosting bats can occur up to 200m away (pers. comm. Geoff Billington, Greena Ecological Consultancy, presentation to Somerset Highways 2006)

Mitigation

- 3.48 A revised assessment of potential disturbance to bat roosts based on evidence and how this would be mitigated for in the construction programme included in an updated Environmental Statement.
- 3.49 A condition for a Construction Environmental Management Plan (CEMP) would then implement working methods to prevent disturbance to roosting bats during the construction process.

Policy

- 3.50 The NPS states in Paragraph 5.34 that 'Many individual wildlife species receive statutory protection under a range of legislative provisions'. It is illegal, under the Wildlife and Countryside Act 1981 (as amended) to intentionally or recklessly disturb an individual bat in its roost, which would include nearby construction activity.

Lighting effects on biodiversity

Background

- 3.51 6.3 Environmental Statement Appendix 8.4 Bat Technical Report. With regard to lighting it is proposed that night time working during construction should also be avoided where possible, to decrease the requirement for artificial lighting, and reduce the impact of increase noise and vibration on foraging and commuting bats. In addition to this, it is recommended that a wildlife sensitive lighting strategy is adopted through construction and operation to further reduce the potential impact of artificial lighting on bats.
- 3.52 Operationally the following areas have been identified as affecting bat behaviour.
- Camel Cross Junction – there is a proposed increase in lighting levels in this area. Lesser horseshoe and barbastelle have been recorded in habitats adjacent to the junction, in addition to activity from more common species some of which are also light adverse.
 - Vale Farm Link – there is a proposed increase in the lighting levels south of Pepper Hill House, with 2 roosts identified in buildings here.

- Hazlegrove Junction – south of the hedgerow east of Pepper Hill Copse that runs north to south. This hedgerow has been noted for the levels of bat foraging and commuting activity.

Mitigation

- 3.53 A lighting scheme demonstrating that habitats used by bats are kept dark will need to be conditioned both for the construction period within the Construction Lighting Plan (3(g)x of Schedule 2 (3) the Construction and Environmental Management Plan in the DCO) and operationally should be detailed, including through Lux contour plans and technical specifications, in an updated Environmental Statement

Policy

- 3.54 The NPS states in Paragraph 5.34 that 'Many individual wildlife species receive statutory protection under a range of legislative provisions'. With regard to bats this includes the Conservation of Habitats and Species Regulations 2017 regarding European protected species of which Regulation 43 makes it an offence to deliberately disturb wild animals, listed on Schedule 2, in such a way as to be likely to:
- a) impair their ability—
 - (i) to survive, to breed or reproduce, or to rear or nurture their young; or
 - (ii) in the case of animals of a hibernating or migratory species, to hibernate or migrate; or
 - (b) affect significantly the local distribution or abundance of the species to which they belong
- 3,55 The South Somerset District Council Local Plan policy EQ4 states 'All proposals for development... will: Ensure that Habitat Features, Priority Habitats and Geological Features that are used by bats and other wildlife are protected and that the design including proposals for lighting does not cause severance or is a barrier to movement'.

Ecological networks (generic)

Background

- 3.56 6.1 Environmental Statement - Chapter 8: Biodiversity_- 8.3.24 *Somerset's Ecological Network* identifies the remaining areas of priority habitat, areas for biodiversity enhancement, and the connections that need to be made to link these areas up across the landscape. This is a joint project between Somerset Wildlife Trust, Somerset Environmental Records Centre and Somerset County Council using the BEETLE model developed by Forest Research. No consultation was held with Somerset County Council or Somerset Wildlife Trust regarding the ecological networks and no assessment is included in the statement.

Mitigation

- 3.57 The effects of the proposed scheme could be modelled, post construction, to identify changes in Somerset's ecological networks, particularly for woodland and appropriate mitigation applied. An additional section on this should be included in the Environmental Statement.

Policy

- 3.58 The NPS states in paragraph 5.36 that 'Applicants should include appropriate mitigation measures as an integral part of their proposed development, including identifying where and how these will be secured. In particular, the applicant should demonstrate that:

- developments will be designed and landscaped to provide green corridors and minimise habitat fragmentation where reasonable;
- opportunities will be taken to enhance existing habitats and, where practicable, to create new habitats of value within the site landscaping proposals, for example through techniques such as the 'greening' of existing network crossing points, the use of green bridges and the habitat improvement of the network verge.

- 3.59 The South Somerset District Council Local Plan states 'All proposals for development..., will... promote coherent ecological networks'; 'Maximise opportunities for restoration, enhancement and connection of natural habitats'; and '... assist [the] recovery of identified priority species'.

Species mortality

Background

- 3.60 6.3 Environmental Statement Appendix 8.10 Water Vole and Otter Technical Report - The report states that 'The records show that otters are using both the River Cam and the River Carey, with records south and north of the A303. Neither of these water courses cross the A303. Owing to the lack of connectivity, it is likely that there are 2 separate populations of otters south and north of the A303. There may be limited connection between the otters on each river but the existing A303 is a busy road and is likely to form a significant barrier'.
- 3.61 However, I disagree with this statement. Crossing is likely to take place at night when traffic frequency is far less. I have personally have observed a dead otter in the central carriageway of the A303 just east of the Sparkford roundabout, which was probably killed either coming from or to Dyke Brook. Furthermore, Somerset Otter Group, who were not consulted by the applicant's consultants, recorded at least another four dead otters at or near Sparkford Roundabout. This is a significant 'hot spot' in respect of otter mortality.
- 3.62 Furthermore, single otter road casualties have been recorded in the length of the proposed A303 upgrade. Otters can cross main roads between watersheds quite remote from any watercourse. As well as being an issue currently, increased traffic speeds resultant of the proposed dualling is likely to increase the risk of future otter deaths unless adequately mitigated for.

- 3.63 6.3 Environmental Statement: Confidential Badger Technical Report - Five main badger setts have been identified within 500 metres of the boundary of the scheme. The field surveys have identified a total of 68 badger setts within 500 metres of the scheme, of which 5 have been classified as main setts. However, no surveys/monitoring of badger road casualties along the A303 have been carried out. It is considered a single unspecified underpass for badgers is not sufficient mitigation.
- 3.64 Deer casualties are not reported, and no survey of deer crossing has been included. Whilst deer are not considered of conservation concern they should be considered on health and safety grounds. No consultation appears to have been made with the The Deer Initiative or Langbein Wildlife

Mitigation

- 3.65 The scheme needs to provide an underpass for otters near the Sparkford Roundabout supplemented by underpasses elsewhere. These can be designed into the scheme whilst there is opportunity to do so and included in the appropriate construction drawings and specifications.
- 3.66 Further monitoring of the existing A303 for badger mortality should be carried out and included in the Environmental Statement.
- 3.67 Consultation with The Deer Initiative and / or Langbein Wildlife concerning deer mortality and any related accident data for collisions and the results, along with any mitigation required, included in the Environmental Statement.

Policy

- 3.68 The NPS states in Paragraph 5.34 that 'Many individual wildlife species receive statutory protection under a range of legislative provisions'. Paragraph 5.3.5 goes on to state '... species [which includes otters] and habitats have been identified as being of principal importance for the conservation of biodiversity in England and Wales and therefore requiring conservation action. The Secretary of State should ensure that applicants have taken measures to ensure these species and habitats are protected from the adverse effects of development. Where appropriate, requirements or planning obligations may be used in order to deliver this protection.'
- 3.69 The NPS states in Paragraph 5.34 that 'Many individual wildlife species receive statutory protection under a range of legislative provisions'. With regard to otters this includes the Conservation of Habitats and Species Regulations 2017 regarding European protected species of which Regulation 43 makes it an offence to deliberately disturb wild animals, listed on Schedule 2, in such a way as to be likely to:
- a) impair their ability—
 - (i) to survive, to breed or reproduce, or to rear or nurture their young; or
 - (ii) in the case of animals of a hibernating or migratory species, to hibernate or migrate; or

(b) affect significantly the local distribution or abundance of the species to which they belong

- 3.70 The NPS also states in paragraph 5.33, 'Development proposals potentially provide many opportunities for building in beneficial biodiversity or geological features as part of good design. When considering proposals, the Secretary of State should consider whether the applicant has maximised such opportunities in and around developments. The Secretary of State may use requirements or planning obligations where appropriate in order to ensure that such beneficial features are delivered.'
- 3.71 Section 99 of the Government circular 2005/06 on biodiversity and geological conservation states that *'It is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision.'*
- 3.72 The South Somerset District Council Local Plan states 'All proposals for development..., will... promote coherent ecological networks'; 'Maximise opportunities for restoration, enhancement and connection of natural habitats'; and '... assist [the] recovery of identified priority species'.

Air quality effects on priority habitats

Background

- 3.73 6.1 Environmental Statement - Chapter 8: Biodiversity_– In relation to air quality changes 8.7.6 Whitesheet Hill Site of Special Scientific Interest (SSSI) is used which is in Wiltshire and remote from the site of the proposed dualling. Nitrogen oxide (NOx) deposition falls to background levels within 200m of roads. Sparkford Wood SSSI, located over 1 kilometre from the scheme, is considered sufficiently far away that it would not be subject to air quality impacts as a result of the works as would the next nearest SSSI Babcary Meadows, approximately 3.9km to the north. See also 8.10.50.
- 3.74 However, consideration should be given to the effects of air quality changes to nearby priority habitats existing and proposed, and Local Wildlife Sites (LWS). For example, the scheme is partially located within Gason Field Lane LWS, which is designated for its calcareous grassland habitat (paragraph 8.10.19). In addition, the statement in paragraph 8.10.52 states for Camel Hill Transmitter Site LWS and Hazlegrove Park LWS, it is anticipated that there would be increases in NOx concentrations once the scheme is operational. The report surmises without evidence that increases would affect the periphery of the LWSs and thus has the potential to result in a small area of habitat degradation.

However, the effects of NO_x deposition can occur up to 150 metres from a road (Bignall et al, 2004; 2007⁵).

Mitigation

- 3.75 An assessment of air quality changes on priority habitats within 200m of the road using the APIS⁶ methodology to assess deposition effects and an evaluation of the results and included in an updated Environmental Statement.

Policy

- 3.76 The NPS states in paragraph 5.35, 'Other... habitats have been identified as being of principal importance for the conservation of biodiversity in England and Wales and therefore requiring conservation action. The Secretary of State should ensure that applicants have taken measures to ensure these... habitats are protected from the adverse effects of development...'
- 3.77 All proposals for development, including those which would affect sites of regional and local biodiversity... will: Protect the biodiversity value of land...'

Effects on Barn Owls and their habitats

Background

- 3.78 6.3 Environmental Statement Appendix 8.5 Barn Owl Technical Report states that temporary habitat loss will have a minor effect as is considered that barn owls are not using the full amount of habitat available. However, permanent loss of habitat for barn owls would be through the realignment of the road and land take of the scheme. The impact for permanent habitat loss is considered to be Moderate Adverse due to the proximity of the works to the territory of one of the known breeding pairs. This would mean potential decrease in their foraging success without moving their territory. It appears that no mitigation is given for permanent loss of habitat affecting the viability of one breeding pair of barn owls.
- 3.79 Otherwise, I concur that further surveys are required prior to construction to ensure barn owls have not begun using potential nesting sites. The mitigation and enhancements recommended is also appropriate for the scheme.

Mitigation

- 3.80 Provision of replacement habitat to offset the permanent loss of habitat to ensure the viability of the breeding pair of barn owls possibly through off site enhancement. Defra's Biodiversity offsetting metric or Somerset's Habitats Evaluation Procedure should be used to calculate the equivalent amount of habitat needed to replace that lost during construction. Both methods include temporal and risk factors and are compatible with each other. This would then give confidence that the landscaping associated with the proposed road scheme

⁵ Bignall, K., Ashmore, M. & Power, S. 2004. *The ecological effects of diffuse air pollution from road transport*. English Nature Research Report No. 580. Peterborough: English Nature; Bignall, K. L., Ashmore, M. R., Headley, A. D., Stewart, K. & Weigert, K. 2007. Ecological impacts of air pollution from road transport on local vegetation. *Applied Geochemistry* 22, 6, June 2007, 1265–1271

⁶ <http://www.apis.ac.uk/>

provides sufficient mitigation and indeed provide enhancement. Where mitigation is insufficient the appropriate amount and type should be added to the scheme either on or off site. Furthermore, the scheme should show a resultant enhancement for biodiversity including through habitat creation.

- 3.81 The mitigation, enhancement and monitoring set out in the report must be secured through condition.

Policy

- 3.82 The NPS states in paragraph 5.35, 'Other... species have been identified as being of principal importance for the conservation of biodiversity in England and Wales and therefore requiring conservation action. The Secretary of State should ensure that applicants have taken measures to ensure these... species are protected from the adverse effects of development...'
- 3.83 Paragraph 5.20 of the NPS mentions that 'Government policy for the natural environment is set out in the Natural Environment White Paper (NEWP). The NEWP sets out a vision of moving progressively from net biodiversity loss to net gain.' This has been taken forward in the more recent National Planning Policy Framework 2018 (NPPF) of which paragraph 170 states: 'Planning... decisions should contribute to and enhance the natural and local environment by... minimising impacts on and providing net gains for biodiversity...'
- 3.84 The South Somerset District Council Local Plan policy EQ4 states 'All proposals for development... will: Protect and assist [the] recovery of identified priority species'.

Breeding birds

Background

- 3.85 Environmental Statement, Volume 6.3 Appendix 8.6 Breeding Bird Technical Report states that a total of 47 species were recorded during the surveys within the study area and a total of 45 species were recorded within the works boundary. Nine species are listed on Section 41 of the NERC Act 2006 and one, the Hobby, is listed on Schedule 1 of The Wildlife and Countryside Act 1981. A pair of hobby was confirmed to be breeding within the study area but outside the scheme boundary as was the song thrush. Meadow pipit, mistle thrush and skylark, listed on Section 41 of the NERC Act 2006, were all also recorded immediately adjacent to the scheme boundary.
- 3.86 It is agreed that the potential impacts of the development on breeding birds may include, but are not limited to:
- Damage and/or destruction of active birds' nests.
 - Loss of habitats used for breeding.
 - Loss and fragmentation of foraging habitat.
 - Increased levels of disturbance resulting from noise, light and the presence of people.

- 3.87 And that the resulting effects may include:
- A reduction in species richness and/or abundance.
 - Displacement of birds from areas used for breeding.
- 3.88 The report states that 'The development will impact and potentially contribute to the localised loss or displacement of relatively small numbers of notable bird species'.
- 3.89 Nonetheless, the upgrade of the A303 along this section from a single carriageway to dual would change the ability of some species to move through the landscape due to the increased width of the road and associated landscaping and traffic speeds. The loss and fragmentation of breeding bird habitat would have a wide-ranging impact with about a third of all the species recorded utilising this habitats within the study area. The importance of hedgerows is especially pertinent considering the wider arable landscape.
- 3.90 Mortality rates are not evenly distributed in space or in time. The area in which the road passes through and the behaviour of the birds present in that area can have an effect on the total number of road casualties recorded. Where the road is level without screening vegetation or elevated above the surrounding area birds are more likely to fly into the path of oncoming traffic. Birds also appear to be more susceptible on bends, where roads pass through areas of high habitat heterogeneity such as Camel Hill areas or where hedges line both sides of the road.
- 3.91 A pair of hobby was recorded nesting approximately 100 metres from the works boundary. Research as shown that whilst hobbies are unconcerned by the presence of humans inside vehicles near the nest site, they are usually alarmed by humans on foot close to the nest (Messenger & Roome, 2007⁷). Temporary screening would be provided around the works to avoid disturbance of the nest during the breeding season for hobby (May to September).
- 3.92 The report puts forward as mitigation, to avoid nesting birds, vegetation to be cleared should be done outside the breeding season and where not possible the vegetation will be surveyed prior to removal. If present an exclusion buffer will be placed around the nest. No diameter of exclusion buffer is given.
- 3.93 Nest boxes erected to replace those in the mature trees lost to the proposed scheme.
- 3.94 No assessment of impacts or mitigation for noise is given. Increased traffic speeds would increase existing levels and displace breeding birds further from

⁷ Messenger, A. & Roome, M. 2007. The breeding population of the Hobby in Derbyshire. *British Birds* 100: 594-608

the road (e.g. see Reijnen et al, 1997; Reijnen et al, 2005⁸) reducing habitat available to these species.

Mitigation

- 3.95 Defra's Biodiversity offsetting metric or Somerset's Habitats Evaluation Procedure should be used to calculate the equivalent amount of habitat needed to replace that lost during construction and subsequently due to traffic noise. Both methods include temporal and risk factors and are compatible with each other. This would then give confidence that the landscaping associated with the proposed road scheme provides sufficient mitigation and indeed provide enhancement. Where mitigation is insufficient the appropriate amount and type should be added to the scheme either on or off site. Furthermore, the scheme should show a resultant enhancement for biodiversity including through habitat creation. This needs to be included in an updated Environmental Statement.
- 3.96 A CEMP should include detailed measures for avoiding impacts nesting birds. This would also include details of the screening to protect the nesting hobbies from disturbance.

Policy

- 3.97 The NPS states in paragraph 5.35, 'Other... species have been identified as being of principal importance for the conservation of biodiversity in England and Wales and therefore requiring conservation action. The Secretary of State should ensure that applicants have taken measures to ensure these... species are protected from the adverse effects of development...'
- 3.98 The NPS states in Paragraph 5.34 that 'Many individual wildlife species receive statutory protection under a range of legislative provisions'. The hobby is listed on Schedule 1 of the Wildlife and Countryside Act 1981 (as amended) and is provided from additional protection from intentional or reckless disturbance whilst breeding and with dependent young.
- 3.99 The South Somerset District Council Local Plan policy EQ4 states 'All proposals for development... will: Protect and assist [the] recovery of identified priority species'.

Consideration of Hazel Dormice

Background

- 3.100 6.3 Environmental Statement Appendix 8.8 Dormouse Technical Report states that following the completion of the dormouse surveys involving monthly checks of nest tubes, no dormice or evidence of their presence was discovered. Whilst the nest tube surveys concluded the likely absence of dormice within 250 metres

⁸ Reijnen, R., Foppen, R. & Veenbaas, G. 1997. Disturbance by traffic of breeding birds: evaluation of the effect and considerations in planning and managing road corridors. *Biodiversity and Conservation* 6, 567-581 (1997); Reijnen, M., Veenbaas, G. & Foppen, R. 1995. *Predicting the effects of motorway traffic on breeding bird population*. Wageningen University & Research.

of the scheme, several areas of habitat within the scheme footprint are considered suitable for dormice. Taking into account the small size of the area within the project footprint and the amount of suitable habitat present within the wider area, the project site is considered to be of Local conservation value for dormice.

- 3.101 The reports states that any onsite loss of a dormice population would be unlikely to affect the conservation status of the species at a county level or higher, due to Somerset being a stronghold for the species. However, this statement provides no evidence that Somerset is a stronghold, the species is absent from areas of the County, and is considered dismissive of assessing the Favourable Conservation Status of the local population if present.
- 3.102 A precautionary approach is recommended, included a toolbox talk, when removing the four hedgerows affected. In the unlikely event that a dormouse is discovered, works would be stopped while an appropriately qualified ecologist is consulted. However, it is considered that site operatives cannot be relied on to observe or identify dormouse nest whilst amid construction activity.

Mitigation

- 3.103 The Environmental Statement should include consideration of the Favourable Conservation Status dormice at the local level, if present.
- 3.104 A method for dealing with any discovered dormouse or evidence of dormice should be include in the CEMP that does not rely on the sole observations of operatives.

Policy

- 3.105 The NPS states in Paragraph 5.34 that 'Many individual wildlife species receive statutory protection under a range of legislative provisions'. Paragraph 5.3.5 goes on to state '... species [which includes hazel dormice] and habitats have been identified as being of principal importance for the conservation of biodiversity in England and Wales and therefore requiring conservation action. The Secretary of State should ensure that applicants have taken measures to ensure these species and habitats are protected from the adverse effects of development. Where appropriate, requirements or planning obligations may be used in order to deliver this protection.'
- 3.106 The NPS states in Paragraph 5.34 that 'Many individual wildlife species receive statutory protection under a range of legislative provisions'. With regard to otters this includes the Conservation of Habitats and Species Regulations 2017 regarding European protected species of which Regulation 43 makes it an offence to deliberately disturb wild animals, listed on Schedule 2, in such a way as to be likely to:
- a) impair their ability—
 - (i) to survive, to breed or reproduce, or to rear or nurture their young; or
 - (ii) in the case of animals of a hibernating or migratory species, to hibernate or migrate; or

(b) affect significantly the local distribution or abundance of the species to which they belong

- 3.107 The South Somerset District Council Local Plan policy EQ4 states 'All proposals for development... will: Protect and assist [the] recovery of identified priority species'.

Consideration of Great Crested Newts

Background

- 3.108 6.3 Environmental Statement, Appendix 8.9 Great Crested Newt Technical Report reported the presence of great crested newts (GCN) within a number of these ponds. Three distinct meta-populations were identified, though only two would be subject to effects as a result of the scheme. Meta-population A, located at Downhead, has a medium population and meta-population C, located at Hazlegrove, has a medium population. Meta-population B located at Yarcombe was excluded from further assessment as all ponds associated with this meta-population are over 500 metres from the construction footprint of the scheme.
- 3.109 The survey methods used were generally in accordance with best practice. However, a study by Atkins (Sellars, 2010⁹) showed that ponds with poor suitability were likely to be present in 8% not 3% as stated in Table 2.1. Poor suitability ponds were not surveyed further in the survey, whereas a secondary check could have been made through eDNA analysis for 24 and 43. However, overall the survey is thorough and fit for purpose. The results are clearly presented although it would be helpful to give percentages of habitat lost. A radius of 250m gives an area of approximately 19.6ha. Area loss of hedgerow would also be appropriate in assessing habitat loss. Ninety percent of a great crested newt population were found to occur within 100m of a breeding pond in one study (Jehle, 2000¹⁰).
- 3.110 The Downhead population without mitigation would result in the temporary loss of terrestrial habitat within the core area (0-50 metres) of 0.23 hectare (ha) and the permanent loss would be 0.04ha within 50 metres of breeding ponds. Between 50 metres and 250 metres there would be 1.643ha permanently lost and 3.63ha temporarily lost. Between 250 and 500 metres there would be 1.22ha and 5.64 ha lost respectively.
- 3.111 The Hazlegrove House meta-population would have a permanent loss of terrestrial habitat amounting to 0.47 ha and a temporary loss 3.01ha within 250 and 500 metres of the proposed road construction amounting to some 4.5% of the habitat available being affected. No losses would occur at under 250 metres.

⁹ Sellars, C. 2010. Habitat Suitability Index Scores as an Indicator of the Presence of Great Crested Newts. *In Practice*, 69, 22 -23

¹⁰ Jehle, R. 2000, 'The terrestrial summer habitat of radio-tracked great crested newts (*Triturus cristatus*) and marbled newts (*T. marmoratus*)', *Herpetological Journal*, 10, 137-142.

- 3.112 Pond 32 to the south of the A303 is possibly linked to ponds north of the A303 through dispersal of juveniles. The A303 is unlit and not heavily trafficked at night. Dualling will reduce the likelihood of successful dispersal occurring and increase the chances of mortality. What evidence is there that GCN's will cross / not cross roads? Are there other ponds to the south of the road that would support this apparently isolated population?
- 3.113 No mitigation is given against potential hazards to great crested newts in the carriageway. Any gullies and kerbs can trap and cause mortality to the species.

Mitigation

- 3.114 It is generally agreed that the details given in Section 5 and Appendix F with regard to the mitigation to be applied. This will include replacement habitat creation which results in a net gain for the species. However, further evidence is required on the ability of GCNs to cross roads or not and whether the population south of the road is likely to become increasingly isolated following construction of a dual carriageway.
- 3.115 Each of these local populations would still need to be assessed for Favourable Conservation Status and included in an updated Environmental Statement.
- 3.116 In areas where dispersal is likely to occur, and if no underpasses are provided / possible, the carriageways need to be designed to be GCN friendly, e.g. with appropriate drainage such as using offset gullies and traversable kerbing. These need to be shown in the relevant construction plans.

Policy

- 3.117 The NPS states in Paragraph 5.34 that 'Many individual wildlife species receive statutory protection under a range of legislative provisions'. Paragraph 5.3.5 goes on to state '... species [which includes great crested newts] and habitats have been identified as being of principal importance for the conservation of biodiversity in England and Wales and therefore requiring conservation action. The Secretary of State should ensure that applicants have taken measures to ensure these species and habitats are protected from the adverse effects of development. Where appropriate, requirements or planning obligations may be used in order to deliver this protection.'
- 3.118 The NPS states in Paragraph 5.34 that 'Many individual wildlife species receive statutory protection under a range of legislative provisions'. With regard to otters this includes the Conservation of Habitats and Species Regulations 2017 regarding European protected species of which Regulation 43 makes it an offence to deliberately disturb wild animals, listed on Schedule 2, in such a way as to be likely to:
- a) impair their ability—
 - (i) to survive, to breed or reproduce, or to rear or nurture their young; or
 - (ii) in the case of animals of a hibernating or migratory species, to hibernate or migrate; or

(b) affect significantly the local distribution or abundance of the species to which they belong

- 3.119 The South Somerset District Council Local Plan policy EQ4 states 'All proposals for development... will: Protect and assist [the] recovery of identified priority species'.

Invertebrate survey and assessment

Background

- 3.120 6.3 Environmental Statement Appendix 8.11 Invertebrate Technical Report states that survey methods involved visual searching of nectaring sites and basking areas, the use of a hand net or pooter to capture individual species, sweeping vegetation, beating foliage, and grubbing. These methods were employed at all sites. Additionally, the use of pitfall traps was employed at Site 7. A series of pitfall traps were placed on the site, following Natural England guidelines. The use of pan-traps was employed at Site 2.
- 3.121 As well as brown hairstreak (see below), a single white letter hairstreak, a BAP, s41 priority species was recorded on the southern perimeter of Site 5 (?). Six species of nationally scarce flies were recorded and nationally scarce mining bee on Sites 2 and 10 (?). It would be helpful if the site locations were stated.
- 3.122 No assessment of the effects of increased carriageway widths due to dualling the A303 is given with regard to invertebrate dispersal and possible increased mortality.
- 3.123 No mention is made of establishing areas of scrub in the landscape proposals which is also important for invertebrates and their prey.

Mitigation

- 3.124 The environmental statement should include an assessment of the effects of proposed dualling over the current situation on the existing A303 for the dispersal of invertebrates.
- 3.125 The CEMP should include details of how the effects of construction would be mitigated to prevent harm to priority and nationally scarce species of invertebrates.
- 3.126 Wood arising from any trees to be felled should be stacked into habitat piles to provide habitat for saproxylic species. These habitat piles should be placed in a range of sunny and shady locations. Details should be included in the CEMP.
- 3.127 Landscape plans to include the establishment of scrub areas for invertebrates planted with host flora. This should be shown in updated landscape plans and management of such in the LEMP.

Policy

- 3.128 The NPS states in paragraph 5.35, 'Other... species have been identified as being of principal importance for the conservation of biodiversity in England and Wales and therefore requiring conservation action. The Secretary of State should ensure that applicants have taken measures to ensure these... species are protected from the adverse effects of development...'
- 3.129 The South Somerset District Council Local Plan policy EQ4 states 'All proposals for development... will: Protect and assist [the] recovery of identified priority species'.

Consideration of Brown Hairstreak butterfly

Background

- 3.130 6.3 Environmental Statement Appendix 8.12 Brown Hairstreak Technical Report states that the results show that brown hairstreak was not present on any hedgerows that had been recently flailed. However, brown hairstreak was recorded on hedgerows with varying levels of blackthorn abundance including hedgerows where blackthorn was considered rare. Brown hairstreak butterflies live in self-contained colonies within habitats that contain blackthorn, the larval food source, such as woodland and hedgerows.
- 3.131 It is agreed that vegetation clearance during construction would result in the loss of suitable brown hairstreak ovum laying habitat and may cause harm or disturbance to brown hairstreak. In addition, once operational, annual flailing of roadside hedgerows may result in the loss of suitable brown hairstreak ovum laying habitat and may cause harm or disturbance to brown hairstreak if present within the blackthorn.
- 3.132 The effects of proposed dualling the A303 has not been considered on the dispersal of brown hairstreak and whether there would be an increased mortality rate?

Mitigation

- 3.133 An assessment of the effects of dualling on the dispersal and mortality of brown hairstreak butterfly included in an updated Environmental Statement.
- 3.134 It is proposed that the new hedgerows should incorporate native broadleaved trees with frequent or occasional blackthorn. New hedgerow planting should ideally be undertaken prior to vegetation clearance to allow brown hairstreak to colonise new planting. The hedgerows should connect to existing hedgerows to retain the connectivity of the habitat and prevent habitat fragmentation. The landscape planting schedule will need to be checked to make sure that this is the case.
- 3.135 Hedgerow removal should ideally be carried out in the winter months. Where possible, blackthorn bushes with brown hairstreak ovum should be translocated into new hedgerow planting. This should allow brown hairstreak to become established within new hedgerow planting while preventing the loss of brown

hairstreak during vegetation clearance. This would need to be secured through a condition for the CEMP.

Policy

- 3.136 The NPS states in paragraph 5.35, 'Other... species have been identified as being of principal importance for the conservation of biodiversity in England and Wales and therefore requiring conservation action. The Secretary of State should ensure that applicants have taken measures to ensure these... species are protected from the adverse effects of development...'
- 3.137 The South Somerset District Council Local Plan policy EQ4 states 'All proposals for development... will: Protect and assist [the] recovery of identified priority species'.

Environmental Masterplan

Background

- 3.138 There are extensive areas of amenity grassland that should not be top soiled and seeded. This would favour nitrogen loving species and reduce the diversity of flora species and hence invertebrates including pollinators. Similarly, the use of top soil for other habitat areas is likely to not fully exploit the diversity of species possible.
- 3.139 It is noted that amenity grassland is specified for the routes of Public Rights of Way.
- 3.140 Generally, the indicative species planting mixes are questionable for this part of Somerset and for the number of species.

Mitigation

- 3.141 The specification for soils in the Soils Handling and Management Plan should state that amenity grassland areas be made with sub soil, chalk or planings and allowed to be colonised or seeded with a wild flower mix. These areas would then favour non-nitrogen loving species, provide a richer species diversity and reduce rank grassland, which in turn require less cutting and hence maintenance costs. Other areas of habitat enhancement should not be created using top soil but with sub soil, or sub soil with inverted top soil. This will promote flora species and an associated abundance of pollinators.
- 3.142 Natural England requested that in the Landscape and Ecological Management Plan (LEMP), 'cut and remove' was employed for grassland management (including amenity grassland) to reduce nutrient levels and increase diversity¹¹. However, it is considered that this should be part of the Soils Handling and Management Plan.

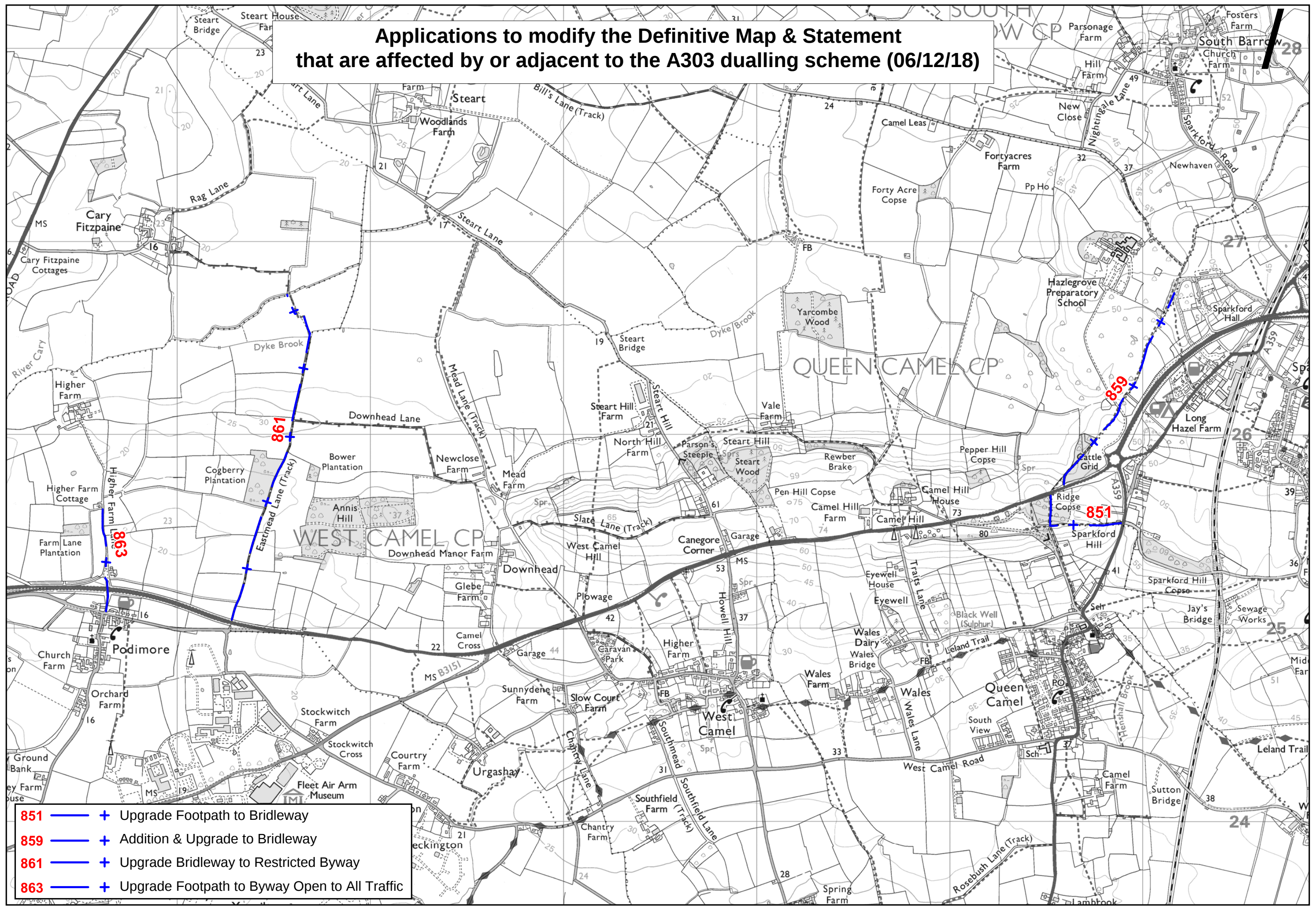
¹¹ https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010036/TR010036-000243-A303_8.2_SoCG_NE.pdf

- 3.143 PROW can be maintained through being mown 1 metre wide through these areas when required. They do not especially need to be an amenity grass mix where a wild flower meadow mix would be of higher benefit to biodiversity. The Landscape Masterplan needs to be amended.
- 3.144 Appropriate management given to habitats in a Landscape and Ecological Management Plan.
- 3.145 Consultation with local ecologists and /or botanists is recommended prior to finalising planting mixes for landscaping.

Policy

- 3.146 Paragraph 5.33 of the NPS states that 'Development proposals potentially provide many opportunities for building in beneficial biodiversity or geological features as part of good design. When considering proposals, the Secretary of State should consider whether the applicant has maximised such opportunities in and around developments. The Secretary of State may use requirements or planning obligations where appropriate in order to ensure that such beneficial features are delivered.'
- 3.147 The scheme provides an opportunity to contribute to the Somerset County Council's recently adopted Pollinator Action Plan and 'The National Pollinator Strategy: for bees and other pollinators in England' (Defra, 2014¹²).
- 3.148 The South Somerset District Council Local Plan policy EQ4 states 'Maximise opportunities for restoration, enhancement and connection of natural habitats; and Incorporate beneficial biodiversity conservation features where appropriate'.

Applications to modify the Definitive Map & Statement that are affected by or adjacent to the A303 dualling scheme (06/12/18)



- 851** — + Upgrade Footpath to Bridleway
- 859** — + Addition & Upgrade to Bridleway
- 861** — + Upgrade Bridleway to Restricted Byway
- 863** — + Upgrade Footpath to Byway Open to All Traffic

WILDLIFE AND COUNTRYSIDE ACT 1981

THE COUNTY OF SOMERSET DEFINITIVE MAP AND STATEMENT

The Somerset County Council (No. 2) Modification Order 2018

This Order is made by the Somerset County Council under section 53(2)(b) of the Wildlife and Countryside Act 1981 ("the Act"), because it appears to that authority that the County of Somerset Definitive Map and Statement require modification in consequence of the occurrence of an event specified in sections 53(3)(a) (i) and (iii) of the Act, namely, the coming into operation of the Orders specified in Part III of the Schedule.

The Somerset County Council hereby order that:

- 1) For the purposes of this order the relevant date is 22 June 2018.
- 2) The County of Somerset Definitive Map and Statement shall be modified as described in Part I and Part II of the Schedule and shown on the plans attached to the Order.
- 3) This Order shall take effect on the date it is made and may be cited as the Somerset County Council No. 2 Modification Order 2018

Dated 22 June 2018

**THE COMMON SEAL of the
COUNTY COUNCIL OF SOMERSET
Was hereto affixed in
The presence of:**

SCHEDULE

PART I

MODIFICATION OF THE DEFINITIVE MAP

Description of paths or ways to be deleted

1. Part of footpath Y 12/10 starting from Pill Bridge Lane (point Y on plan 2) and running in a generally north easterly direction for approximately 105 metres to point E.
2. Part of footpath Y 12/6 starting from Pill Bridge Lane (point Y on plan 2) and running in a generally south westerly direction for approximately 220 metres to point Z.
3. Part of footpath Y 12/4 starting from a point 152 metres west of its junction with footpath Y 12/10 (point H on plan 2) and running in a generally easterly direction for approximately 380 metres to point J.
4. Part of footpath Y 12/12 starting from grid ref ST51687 23258 (point A on plan 3) and running in a generally north westerly direction for approximately 57 metres to point E.
5. Part of footpath Y 12/11 starting from grid ref ST51607 22900 (point C on plan 3) and running in a generally westerly direction for approximately 89 metres to point D.

Description of paths or ways to be added

1. A footpath in the parish of Ilchester starts from the southern end of the adopted section of Roman Road (point A on plan 1) and runs in a generally south westerly direction for approximately 175 metres to point B.
2. A footpath in the parish of Ilchester starts from Roman Road at grid ref ST51898 22381 (point A on plan 2) and runs in a generally northerly direction for approximately 72 metres to point X and then in a generally easterly direction for approximately 56 metres to point B.
3. A footpath in the parish of Ilchester starts from grid ref ST 51397 22797 (point C on plan 2) and runs in a generally south easterly direction for approximately 290 metres to point D.
4. A footpath in the parish of Ilchester starts from Grid Ref ST51461 22720 (point F on plan 2) and runs in a generally northerly direction for approximately 92

metres and then in a generally east north easterly direction for approximately 50 metres to point E.

5. A footpath in the parish of Ilchester starts from Grid Ref ST51461 22720 (point F on plan 2) and runs in a generally southerly direction for approximately 180 metres to the county road at point G.
6. A footpath in the parish of Ilchester starts from grid ref ST51687 23258 (point A on plan 3) and runs in a generally north easterly for approximately 35 metres to footpath Y 12/14 at point B.
7. A footpath in the parish of Ilchester starts from grid ref ST51601 22900 (point C on plan 3) and runs in a generally westerly, south westerly and north north easterly direction for approximately 154 metres to point D.
8. A footpath in the parish of Charlton Mackrell starts from the northern end of the adopted section of Roman Road (point A on plan 4) and runs in a generally north easterly direction for approximately 590 metres to point X.
9. A footpath in the parish of Charlton Mackrell starts from grid ref ST53253 24978 (point Z on plan 4) and runs in a generally north easterly direction for approximately 300 metres to point Y.
10. A footpath in the parish of Charlton Mackrell starts from grid ref ST53400 25281 (point W on plan 4) and runs in a generally north easterly direction for approximately 600 metres to point B.
11. A footpath in the parish of Yeovilton starts from Higher Farm Cottage (point A on plan 5) and runs in a generally southerly direction along Higher Farm Lane for approximately 530 metres to the county road at Lower Farm (point B on plan 5).
12. A footpath in the parish of West Camel starts from the northern end of West Camel Road C389 (point A on plan 7) and runs in a generally north westerly direction for approximately 75 metres to point B.
13. A footpath in the parish of West Camel starting from grid ref ST56633 24940 (point C on plan 7) and runs in a generally south easterly direction for approximately 45 metres to point D.

PART II

MODIFICATION OF THE DEFINITIVE STATEMENT

Variations of particulars of paths or ways

RED TEXT TO BE REMOVED

GREEN TEXT TO BE ADDED

BLACK TEXT REMAINS THE SAME

Footpath Y 12/10 in the parish of Ilchester

From:- Footpath Y 12/5

To:- Footpath Y 12/9

Description: The Path is a footpath. It starts at Footpath 5 at a point marked 36 on Pill Bridge Lane and runs north east to the western end of footpath 12/9.

It starts from the junction of footpaths Y 12/5 and Y 12/6 and runs in a generally northerly direction for approximately 112 metres along the western side of the A303 to footpath Y 12/9.

Name of Parish: Ilchester

Kind of path: Footpath

Shown on 6" Ord Sht. No.: 73SE

Footpath Y 12/9 in the parish of Ilchester

From:- Ilchester Road Whitehall Nimmer

To:- Footpath Y 12/10

Description: The Path is a footpath. It starts at the Ilchester Road -Whitehall Nimmer and runs west across fields to Pill Bridge Lane F.P.10.

Name of Parish: Ilchester

Kind of path: Footpath

Shown on 6" Ord Sht. No.: 73SE

Footpath Y 12/6 in the parish of Ilchester

From:- Footpath Y 12/5

To:- County road

Description: The Path is a footpath. It starts at Pill Bridge Lane -footpath 5 and runs south across one field to footpath 4. It starts from the junction of footpath Y 12/5 and runs in a generally southerly direction for approximately 180 metres to the county road.

Name of Parish: Ilchester

Kind of path: Footpath

Shown on 6" Ord Sht. No.: 73SE

Footpath Y 12/4 in the parish of Ilchester

From:- County road by the Old School

To:- Parish boundary

Description: The Path is a footpath. The Ilchester Road near the School and runs in a westerly direction across fields to the Tintinhull parish boundary, where it continues as Y 26/15. It starts at the Ilchester Road near the School and runs in a westerly direction across fields on the northern side of the A37 for approximately 360 metres until it meets the A37. It then continues from the western side of the A303 slip road and runs to the Tintinhull parish boundary, where it continues as footpath Y 26/15.

Name of Parish: Ilchester

Kind of path: Footpath

Shown on 6" Ord Sht. No.: 73SE

Footpath Y 12/12 in the parish of Ilchester

From Ilchester Road

To South Mead Drove

Description: The Path is a restricted byway and a footpath. It starts from the Ilchester Road beside Brown Cottage and has a metalled surface for about 400 yards. Running in a north westerly direction it is bounded by a high

nursery wall on one side and a high hedge on the other, until it enters OS 25. It then runs across fields to the eastern side of the A303 where the footpath bifurcates. One section continues on the western side of the A303 to South Mead Drove at the parish and R.D. boundary. The other section runs from grid ref ST51687 23258 and runs in a generally north easterly for approximately 35 metres to footpath Y 12/14. The eastern section of this path is accepted as a CRF.

Name of Parish: Ilchester

Kind of path: Restricted Byway and Footpath

Shown on 6" Ord Sht. No.: 73SE

Footpath Y 12/19 in the parish of Ilchester

From Roman Road
To A303

Description: The Path is a footpath. It starts at the southern end of the adopted section of Roman Road and runs in a generally south westerly direction for approximately 175 metres to the A303.

Name of Parish: Ilchester

Kind of path: Footpath

Shown on 6" Ord Sht. No.: 73SE

Footpath Y 12/20 in the parish of Ilchester

From Roman Road
To West Street

Description: The Path is a footpath. It starts at Roman Road at grid ref ST51898 22381 and runs in a generally northerly direction for approximately 72 metres and then in a generally easterly direction for approximately 56 metres to West Street.

Name of Parish: Ilchester

Kind of path: Footpath

Shown on 6" Ord Sht. No.: 73SE

Footpath Y 12/5 in the parish of Ilchester

From grid ref ST 51397 22797
To grid ref ST51647 22656

Description: The Path is a footpath. It starts at grid ref ST 51397 22797 and runs in a generally south easterly direction for approximately 154 metres.

Name of Parish: Ilchester
Kind of path: Footpath
Shown on 6" Ord Sht. No.: 73SE

Footpath Y 30/30 in the parish of Yeovilton

From Roman Road
To A 303

Description: The Path is a footpath. It starts at the northern end of the adopted section of Roman Road and runs in a generally north easterly direction for approximately 590 metres to the A303.

Name of Parish: Yeovilton
Kind of path: Footpath
Shown on 6" Ord Sht. No.: 74SW

Footpath L 6/30 in the parish of Charlton Mackrell

From A303
To A37

Description: The Path is a footpath. It starts at grid ref ST53253 24978 on the northern side of the A303 and runs in a generally north easterly direction for approximately 300 metres to the A372.

Name of Parish: Charlton Mackrell
Kind of path: Footpath
Shown on 6" Ord Sht. No.: 74SW

Footpath L 6/31 in the parish of Charlton Mackrell

From A372
To A37

Description: The Path is a footpath. It starts at grid ref ST53400 25281 on the northern side of the A372 and runs in a generally north easterly direction for approximately 600 metres to the A37.

Name of Parish: Charlton Mackrell
Kind of path: Footpath
Shown on 6" Ord Sht. No.: 74SW

Footpath Y 30/31 in the parish of Yeovilton

From Higher Farm Cottage
To County Road at Lower Farm

Description: The Path is a footpath. It starts at Higher Farm Cottage and runs in a generally southerly direction along Higher Farm Lane for approximately 530 metres to the county road at Lower Farm.

Name of Parish: Yeovilton
Kind of path: Footpath
Shown on 6" Ord Sht. No.: 74SW

Footpath Y 27/28 in the parish of West Camel

From West Camel Road
To A303

Description: The Path is a footpath. It starts from the northern end of West Camel Road C389 and running in a generally north westerly direction for approximately 75 metres to the A303.

Name of Parish: West Camel
Kind of path: Footpath
Shown on 6" Ord Sht. No.: 74SW

Footpath Y 27/29 in the parish of West Camel

From grid ref ST56633 24940

To The A303

Description: The Path is a footpath. It starts from grid ref ST56633 24940 and running in a generally south easterly direction for approximately 45 metres to the A303.

Name of Parish: West Camel

Kind of path: Footpath

Shown on 6" Ord Sht. No.: 74SW

PART III

Orders referred to

1. The London-Penzance Trunk Road (Ilchester By-Pass and slip roads side roads) Order 1974

WILDLIFE AND COUNTRYSIDE ACT 1981

THE COUNTY OF SOMERSET DEFINITIVE MAP AND STATEMENT

**The Somerset County Council
(No. 2) Modification Order 2018**

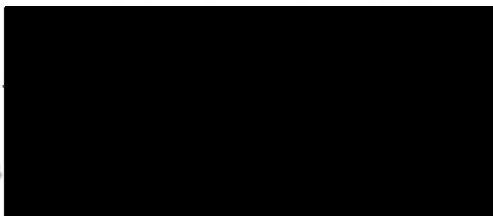
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- 2) The County of Somerset Definitive Map and Statement shall be modified as described in Part I and Part II of the Schedule and shown on the plans attached to the Order.
- 3) This Order shall take effect on the date it is made and may be cited as the Somerset County Council No. 2 Modification Order 2018

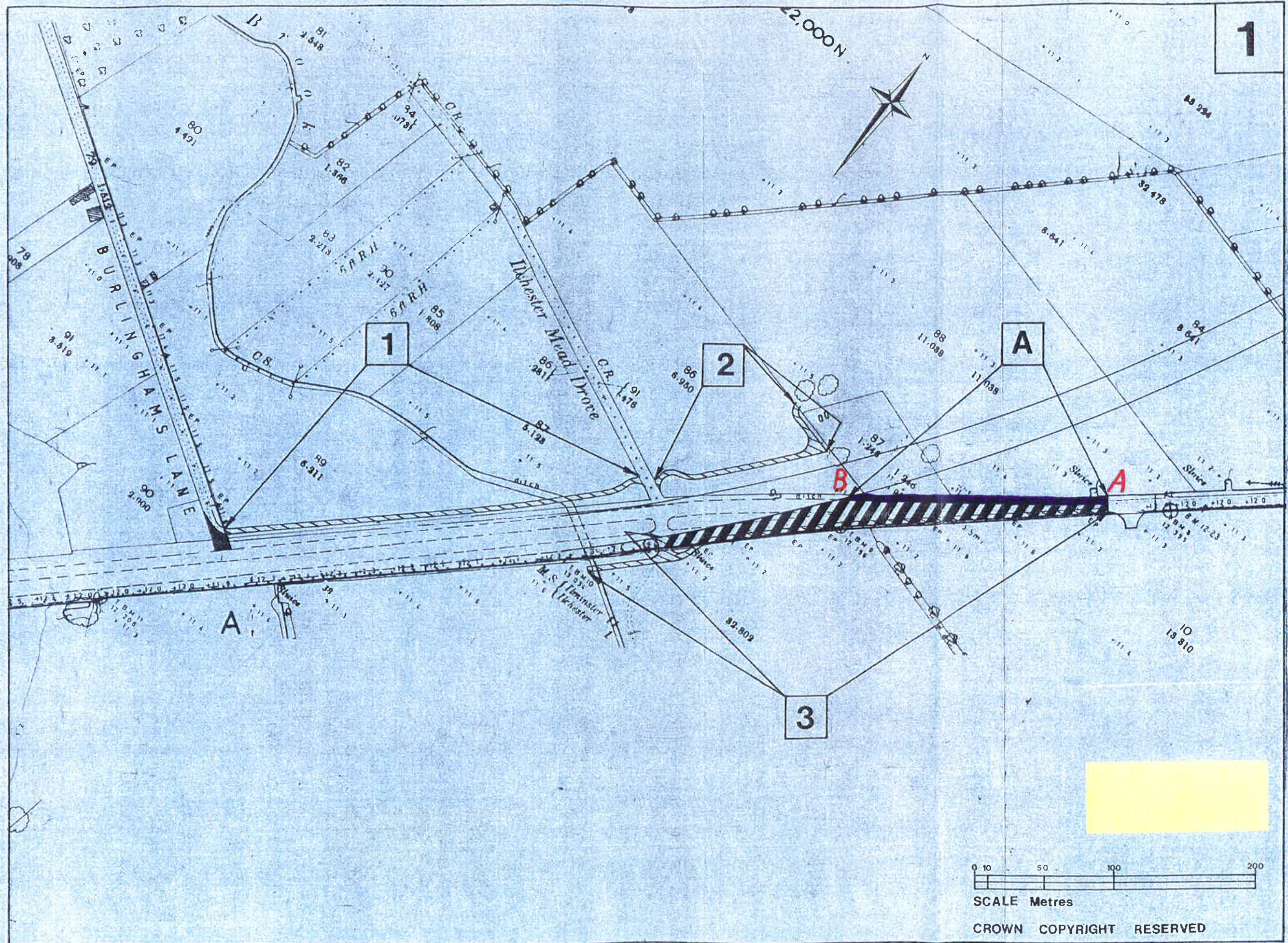
Dated 22 June 2018

**THE COMMON SEAL of the
COUNTY COUNCIL OF SOMERSET
Was hereto affixed in
The presence of:**



30912
Number in Register

ALTERATIONS TO LONDON - PENZANCE TRUNK ROAD (A303)

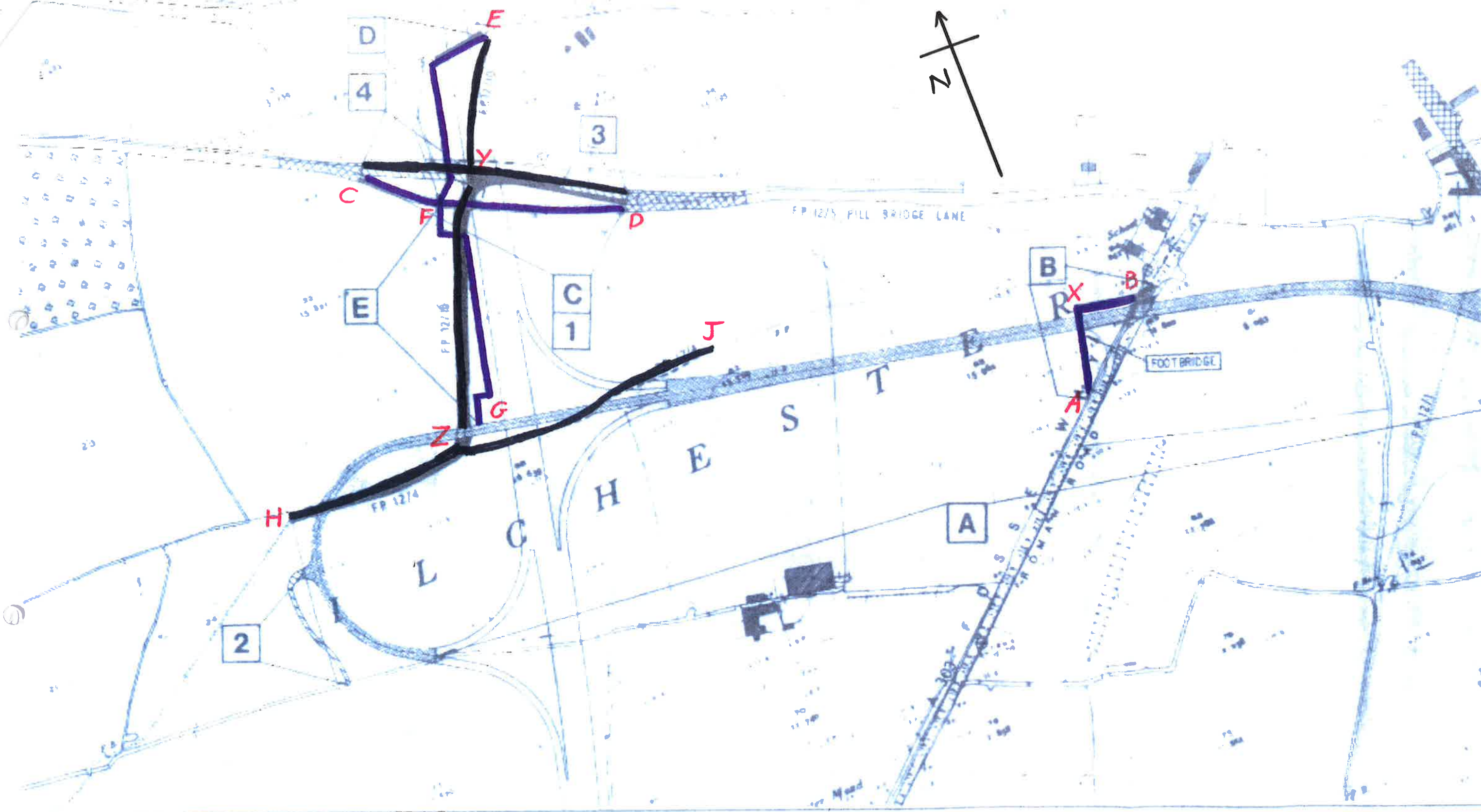


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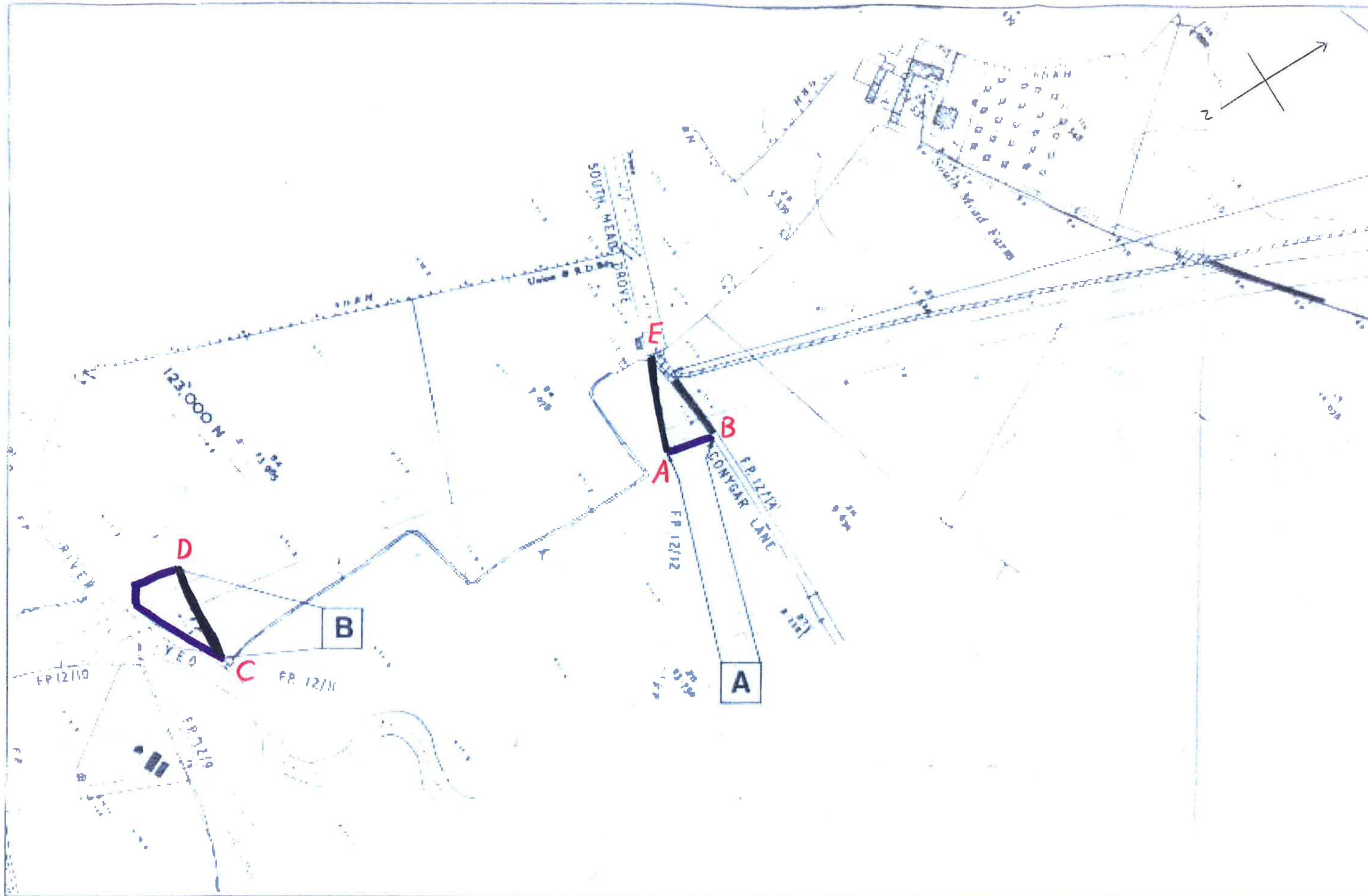
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BRISTOL - DORCHESTER ROAD (A37) AND OTHER ALTERATIONS

2

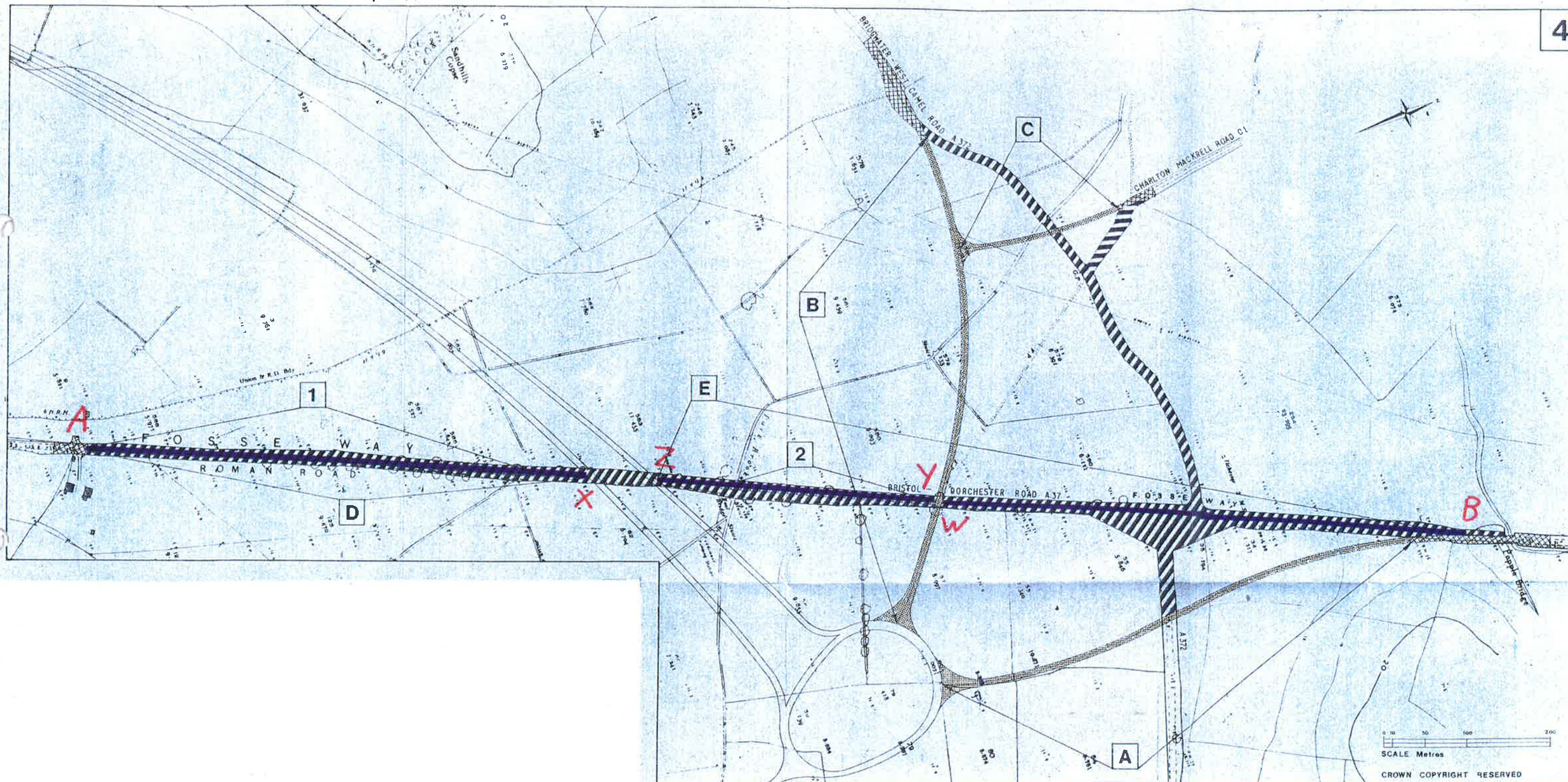


ILCHESTER - STREET ROAD (B3151) AND OTHER ALTERATIONS



BRISTOL - DORCHESTER ROAD (A37) AND OTHER ALTERATIONS

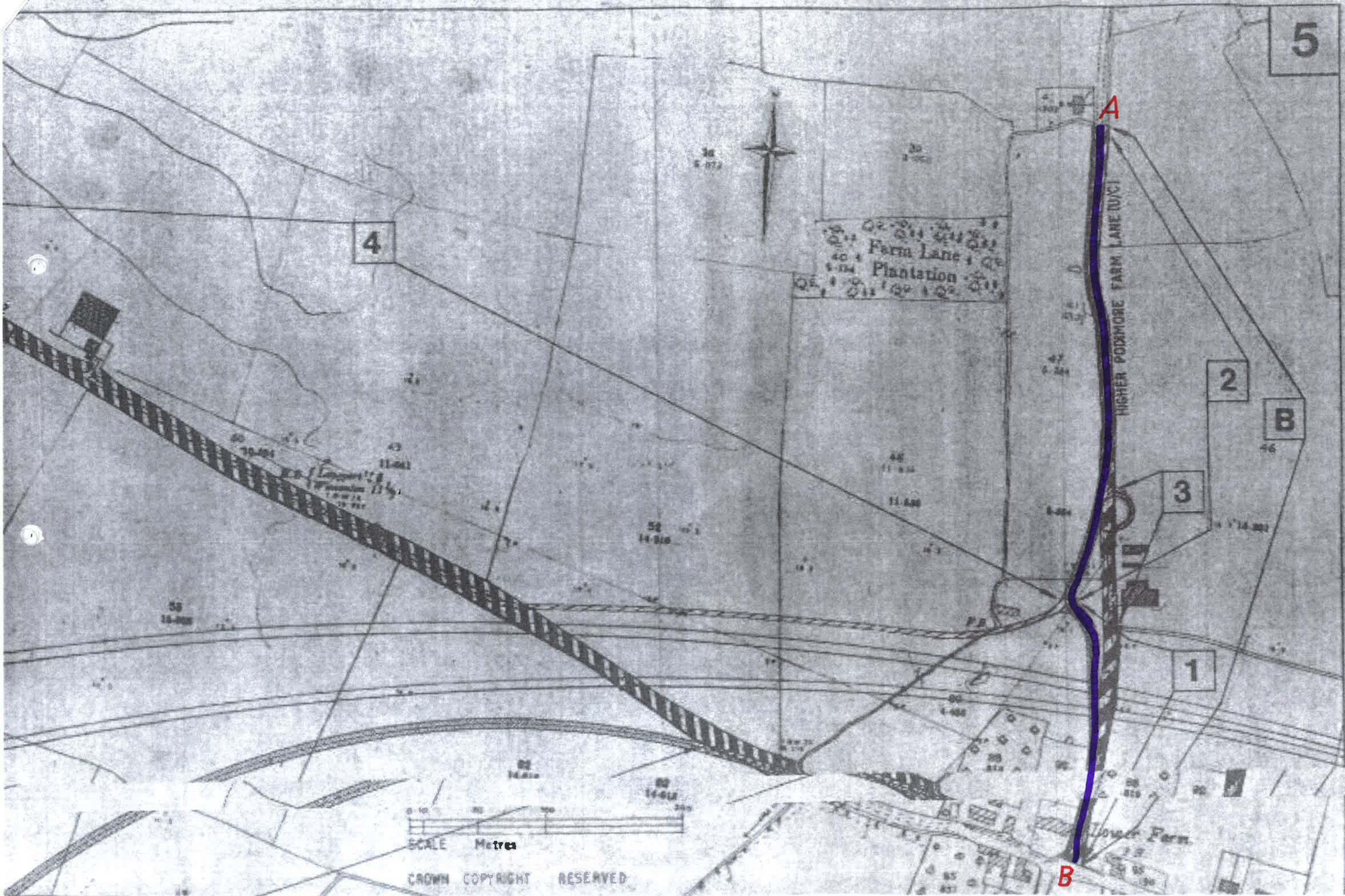
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372) AND OTHER ALTERATIONS



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LONDON - PENZANCE TRUNK ROAD (A303) AND OTHER ALTERATIONS

