

A303 Sparkford to Ilchester Improvement.

Statutory Public Consultation Response.

Somerset County Council. 08 March 2018.

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1.0. INTRODUCTION

- 1.1. Somerset County Council understands that Highways England is undertaking a statutory consultation on the proposed A303 Sparkford to Ilchester dual carriageway improvement prior to entering the formal process of seeking consent to construct the scheme.
- 1.2. As a nationally significant infrastructure project, this scheme will be dealt with under the Development Consent Order (DCO) process. The role of the Council within this process is therefore as a statutory consultee.
- 1.3. The Council notes the information that has been provided in the material published for consultation. We note that a preliminary environmental information report forms part of the consultation material and that provisional local traffic information has been provided.
- 1.4. The scheme design has progressed to an outline stage whereby there are firm proposals; and the layout of the of the new road, lanes, junctions, bridges and changes to the local road network are clearly defined. We note that an Environmental Statement will form part of the application but has not yet been published. We note that a transport assessment has not been provided at this stage in the process. We are therefore only able to comment on whether the proposed layout is appropriate 'in-principle' from an engineering design and safety audit perspective. We are not able to comment on whether the layout is an appropriate solution to accommodate forecast levels of traffic and further information should therefore be provided in the form of a transport assessment to confirm that the proposed layout is appropriate in traffic terms. Our initial review of the proposed layout has identified some points of concern that are set out within this response.
- 1.5. It will be necessary for further information to be made available to the Council in due course to enable us to fully assess the proposals and prepare a report on adequacy of consultation, a local impact report and a statement of common ground.
- 1.6. In our response to the non-statutory stage of consultation in March 2017, and in subsequent correspondence; The Council requested that engagement take place with Highways England to agree the scope and sequencing of the technical activity necessary to support the DCO submission and to agree appropriate Governance and resourcing arrangements.
- 1.7. The Council submitted a formal response to the Environmental Impact Assessment scoping report for the scheme in December 2017 noting the importance of fully quantifying the impact of the proposed scheme and associated junction strategy on local traffic movement, congestion, safety and accessibility; so that impacts can be understood by all parties, and any necessary mitigations agreed. The Council noted that further consideration should be given to:
 - Suitability and validity of the South West Regional Traffic Model for identifying local impacts

- Definition of study area for severance and people & community effects noting that severance impacts related to re-routing traffic may occur outside the proposed study area.
- Stated assumptions about local impacts.
- Inclusion of mitigation for adverse traffic impacts arising from the scheme within the DCO.
- Inclusion of receptors outside the immediate area due to impacts which may be created by re-routing traffic.

1.8. It is disappointing that following these formal submissions; neither the scope and sequencing of activity or the Governance and resourcing arrangements have been fully discussed and agreed despite several requests from the Council. We consider this a risk to the DCO process given the challenging timescales going forward.

1.9. The Council has requested access to several technical reports that are being used to inform Highways England's proposals (e.g. Local Model Validation Report, Traffic Forecasting Report and Land Use & Economic Development Report). A traffic forecasting report was received on 5 March 2018, and other documents are still awaited. It is disappointing that the necessary documents were not made available in time for audit and review to inform this response, making it increasingly challenging for us to undertake our statutory role in preparing a statement of common ground and local impact report within the timescale for DCO submission envisaged by Highways England.

1.10. The Council wish to make clear to Highways England that it is fully committed to the DCO process, and supports the proposal for a dual carriageway improvement between Sparkford and Ilchester in-principle, but subject to further detailed design changes being agreed and appropriate local impact mitigation being agreed as the process of audit and appraisal continues.

1.11. The Council would welcome further dialogue to agree arrangements for engagement in the process going forward and envisages setting out a schedule of the information that we feel will be necessary to enable us to meet our obligations as statutory consultee and as the authority responsible for the local highway network. Any commentary set out in this response should therefore not be considered exhaustive and is made without prejudice to further information that we may request or further observations we may have during the process going forward.

2.0. THE ROLE OF LOCAL AUTHORITIES IN THE DCO PROCESS AND NEED FOR APPROPRIATE RESOURCING

2.1. Local Authorities have an important and significant role to play in Nationally Significant Infrastructure Projects. This is neatly demonstrated by reference to Planning Inspectorate Advice Note 2 – The Role of Local Authorities in the Development Consent Process. It is widely accepted that a local authority will provide an important local perspective at the pre-application stage, in addition to the views expressed directly to the developer by local residents, groups and businesses. Pre-application discussions are likely to include the provision of environmental and technical information and advice; working towards a Statement of Common Ground; and, preparing a report to the Planning Inspectorate in respect of Local Impacts.

2.2. Local authorities are likely to become responsible for discharging many of the requirements (akin to planning conditions) associated with a Nationally Significant Infrastructure Project (NSIP) in their area if development consent is granted. Local authorities are also likely to have a role in monitoring and enforcing many of the Development Consent Order (DCO) provisions and requirements.

- 2.3. There will subsequently be considerable work involved for Somerset County Council and it is therefore important that the Council has adequate resources to perform our functions effectively. At present, the Council does have concerns in the context of having a fair chance to put our case and ensuring an adequate examination of the issues.
- 2.4. The Council has previously sought advice directly from Government on the issue of resourcing in relation to large, complex planning applications. In response, it was confirmed that where the size and importance of a proposal makes it appropriate, local authorities should seek to agree Planning Performance Agreement's (PPA) with developers; PPA's being the only way in which they can be helped with resources for the exercise of their statutory functions. The alternative is for the Council to fund the work itself at substantial cost to Somerset Council tax payers, which is considered neither desirable nor realistic.
- 2.5. Therefore in order for the County Council to meaningfully and fully engage in the project and undertake the work which is necessary if the Council is to undertake the task which Advice Note 2 encourages them to undertake it is requested that a Planning Performance Agreement (PPA) is entered into.
- 2.6. The Council provided a formal response to proposed working group arrangements in December 2017, raising concerns with the proposed arrangements. A response has not yet been received. The Council's primary concern in addition to the absence of a PPA, is an absence of any overarching joint group to oversee the input to the scheme development and DCO process and manage any risks and issues that arise. Such a group would also ensure that there is good information flow between the working groups and correct sequencing and coordination of activity. This would avoid a risk to the DCO process arising from a failure to agree common ground and local impact mitigation.

3.0. THE NEED FOR A DUAL CARRIAGEWAY IMPROVEMENT

- 3.1. The Council strongly supports the need for the single carriageway section of the A303 between Sparkford and Ilchester to be upgraded to dual carriageway as part of an end-end whole route improvement of the A303/A358 between the M3 and the M5 at Taunton. If designed appropriately, the improvement will improve connectivity and access to the South West Region, improve the resilience of the strategic road network and help to promote economic growth in the region.
- 3.2. An economic impact study commissioned by the Council, published in February 2013¹ noted the following key benefits of an end-end route improvement based on comprehensive business & tourism surveys and transport economic assessment.
- 21,400 jobs
 - £41.6bn boost to the economy (GVA)
 - £1.9bn in transport benefits from reduced journey times
 - Improve transport resilience to cope with incidents and during flooding
 - Save over 1800 fatal or serious casualties over 60 years
 - Reduce carbon emissions by 9%
- 3.3. The Council considers that a whole route improvement is necessary and that complementary improvements to the A303/A30 route between Ilminster and Honiton play a vital role in delivering those wider economic benefits and resilience in the strategic road network as part of the whole

¹ A303 A358 A30 Corridor Improvement Programme Economic Impact Study, Parsons Brinkerhoff, Feb 2013

route improvement. Regional resilience will not be fully achieved until the A303/A30 is also sufficiently improved.

3.4. A sectional economic analysis² demonstrated that the Sparkford-Ilchester dualling provided high value for money in its own right due to estimated journey time and safety improvements, with the scheme reducing congestion and delay on this section including a reduction in incidents, forming part of some 50km of uninterrupted dual carriageway.

3.5. The Council appreciates that the technical appraisal of the route has further developed since 2013, through feasibility studies undertaken by Department for Transport³ and through subsequent work by Highways England. The DfT feasibility study and the Technical Appraisal Report published in support of the non-statutory consultation demonstrated that the scheme will meet its stated objectives and the most recent Scheme Appraisal Report that the Council has access to notes the preferred route scheme will present medium value for money as an investment.

3.6. The Council continues to strongly support the proposal to provide a dual carriageway improvement between Sparkford and Ilchester and urges the Government to ensure sufficient funds are allocated to deliver the scheme alongside the further schemes required to improve the remaining sections of single carriageway to dual carriageway as part of a whole-route improvement.

4.0. HIGHWAYS AND TRANSPORT ISSUES

4.1. The Council has engaged with Highways England at a strategic level in developing the proposals but anticipates several matters in relation to the proposed route will have to be resolved in detail with Highways England if adversarial representation to the Planning Inspectorate Examination is to be avoided following submission of the DCO application. Such matters are likely to include:

- Operational performance of the proposed scheme layout.
- Impact of the scheme on the local road network and local communities; and agreement in relation to the technical appraisal and validation of local impacts as well as matters of construction access and construction vehicle routing.
- Design of local road elements of the scheme, including location of key junctions, alterations of junctions and side roads as appropriate, provision of local access roads and any required local impact mitigation.
- Flood risk and surface water drainage.
- Rights of way and access, including segregated crossings.
- De-trunking and transfer of assets between the Council and Highways England if necessary.
- Requirements for local Traffic Regulation Orders.

Operational performance of the proposed scheme layout and impact of the scheme on the local road network and local communities.

4.2. The Council has reviewed the documentation submitted at the time of writing and concludes that information provided to date affords insufficient scope and level of detail to enable the Highway Authority to fully understand the operational performance of the proposed layout and impact of the proposed scheme on the local network. We therefore consider that a transport assessment will be required.

² A303 A358 A30 Corridor Sectional Economic Analysis, Parsons Brinkerhoff, Jan 2013.

³ A303, A358 and A30 Corridor Feasibility Summary Report, DfT, March 2015.

- 4.3. The absence of a robust transport assessment means that The Council is not able to comment on whether the layout is an appropriate solution to accommodate forecast levels of traffic. The provisional local traffic information does not provide any insight into the operational performance of the proposed layout and The Council will require operational traffic assessments of the proposed junctions, to comment on the appropriateness of the layouts and any associated local congestion impacts.
- 4.4. A transport assessment will be required to fully understand the operational performance of the scheme and transport impact on the local network. The scope of the transport assessment will require agreeing between Highways England and the Council as Local Highway Authority. Typically the Local Highway Authority would expect the transport assessment to include but not be limited to the following:
- Definition of study area
 - Baseline assessment
 - Committed development
 - Methodology
 - Wider routing impacts
 - Projected outcomes including operational performance of proposed junctions
 - Mitigation
- 4.5. The provisional local traffic information document published for consultation affords insufficient scope and level of detail to provide the necessary clarity, as it is not possible to comment on the validity of the data shown, or the quantification of local impacts without access to the supporting technical documentation. Even if the data provided were to be taken at face-value as an accurate and robust assessment of forecast traffic flows (subject to confirmation through subsequent audit and review) then wider traffic re-routing impacts are still unclear due to the geographic limitations of the information provided. As an example, the traffic flow data shows a re-routing away from the A359 onto the A303 but this must presumably place pressure on other routes between the A303 and Yeovil such as the A37 or A3088.
- 4.6. Notwithstanding comments above on the validity of the traffic information; The provisional local traffic information provided does highlight that the proposals are likely to create a local impact on the village of West Camel though attracting additional traffic to travel via Howell Hill/ Parsonage Road. The Council requests that Highways England introduce measures to either remove or mitigate this local impact as part of their final scheme. The Council requests that Highways England consider traffic calming or some other mechanism to reduce the volume and speed of traffic travelling along that route and better balance the traffic flows across the various local roads noting that the forecasts show traffic reducing significantly on some other local roads in the vicinity once the A303 improvement is in place.
- 4.7. The Council has received correspondence from West Camel Parish Council and several members of the community objecting to the proposed local access junction arrangements which they feel are the cause of this impact. The Council urges Highways England to more transparently assess variations on the provision of local access junctions and local access roads to establish if a solution can be developed that avoids creating any adverse impacts on local roads; and engage with The Council and local communities in coming to conclusions.

4.8. Having reviewed the preliminary environmental information report The Council would like Highways England to consider the following detailed points which are relevant to community impacts and mitigation; and amend as appropriate going forward:

- P165 – Impact on local economy does not mention local businesses such as the roadside cafes and the bakery etc.
- P169 – Driver stress does not appear to consider drivers using local roads.
- P170 - Temporary increases in journey length and journey time resulting from diversions or closures to NMU routes are considered in the report as beneficial to health and wellbeing (presumably in the basis that people would have to walk further to use them). This would not be the case if the diversions or closures discourage people from walking which would be a more likely outcome. We would expect diversions and closures to be avoided.
- The effect of local road traffic changes on human health and wellbeing does not appear to be considered in the assessment (e.g. volume and speed of traffic adversely affecting the health and wellbeing of vulnerable road users).
- It is not clear in the Air Quality report why certain roads have been included or excluded from the local affected road network and regional affected road network. Greater clarity on the methodology for defining this network should be provided.

Construction management.

4.9. The impact of scheme construction and movement of materials is not set out in the consultation documents at this stage and The Council anticipates that a detailed construction traffic management plan will need to be agreed as part of the DCO process, explaining how construction impacts, in particular movement of materials will be minimised and mitigated. There could be considerable impact on the local highway network and in such circumstances the Council will seek to protect its roads under the legal provisions available.

Engineering Design comments on proposed layout.

4.10. Ongoing engagement with The Council will be essential in order that safe and appropriate layouts and designs are agreed for any elements of the scheme interfacing with or impacting on the local road network. This includes junctions, overbridges and underpasses, changes to alignment of side roads or any other elements of the scheme.

4.11. Initial comments on the proposed highway layout are set out in the report attached at Appendix A1 (Ref sa-6-0059-002-2). At this stage in the process and in the context of available information, we are only able to comment on whether the proposed layout is appropriate 'in-principle' from an engineering design and safety audit perspective.

4.12. Several engineering design concerns with the proposed layout have been highlighted in the attached report. Engineering design concerns regarding the proposed layout should be read in the context of para 4.7 of this covering response which makes wider in-principle observations about the potential traffic impacts of the local access arrangements at Downhead.

4.13. A more detailed engineering design technical audit report on highway layout has been provided to Highways England under separate cover as part of ongoing dialogue on scheme development notwithstanding the requirement for a transport assessment to confirm the layout is appropriate in traffic terms.

4.14. Audit and review of the proposals is also planned in response to provision of more detailed packages of information from Highways England on the following matters:

- Sign Strategy
- Drainage strategy
- Structures
- Non-Motorised User proposals
- Construction proposals including traffic management
- Road lighting
- De trunking and proposed extents of responsibility

Flood Risk and Drainage.

4.15. Initial discussions have taken place between Highways England and The Council (as lead local flood authority), the Environment Agency and Somerset Internal Drainage Board, regarding the proposed drainage design for the scheme. Attenuation would largely be through open storage basins with permanent ponds to aid water quality treatment. Linear features would be used where possible to collect, treat, store and convey water as close to source as possible.

4.16. Based on the information provided to date it is considered that the proposals are broadly appropriate and meet the requirements for managing surface water, subject to ongoing dialogue regarding detailed design.

4.17. There may be opportunities for the proposals if designed accordingly to provide additional enhancements to water management in the area benefitting local flood resilience. Further discussion with local communities and stakeholders regarding potential opportunities is encouraged.

Public Rights of Way and Non-Motorised User provision

4.18. The proposals appear ambiguous about requirements for Non-Motorised User (NMU) provision at this stage, as NMU's may be banned from expressways and an objective for the scheme is to be expressway compatible. The scheme will need to ensure appropriate long-term provision for NMU movement is made particularly as the proposed scheme does not leave a local road in place particularly for east-west movement.

Rights of Way General Approach

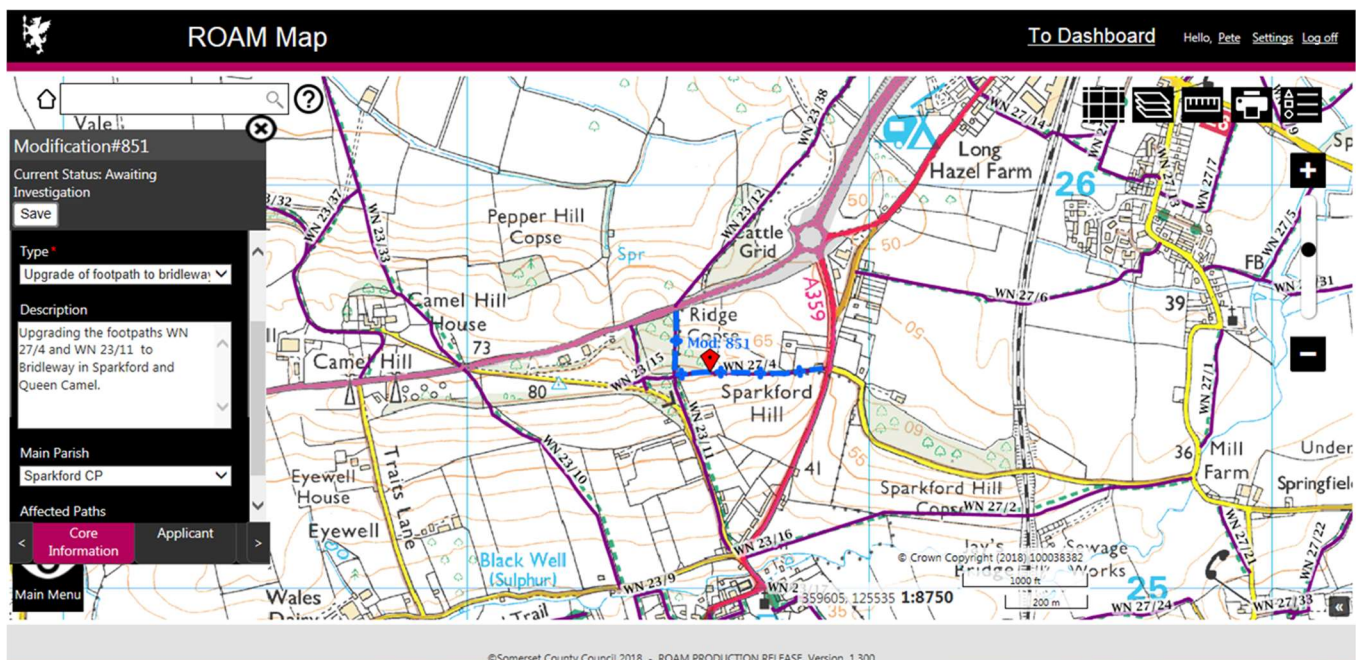
4.19. The diagrammatic map of NMU crossing points is lacking several public rights of way, but broadly speaking the general approach in relation to NMUs appears acceptable. However, it is difficult to judge until all the detail has been considered, particularly in relation to the layout and status of the new crossing points and associated network. The adopted Rights of Way Improvement Plan 2 states that '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.' The Council therefore requires Highways England to adopt this policy approach when developing the detail for NMU provision.

Rights of Way Issues

4.20. Prior to the DCO being made the Council needs to bring the Definitive Map & Statement up to date with historic legal events. The electronic record is up to date; however, the legal record is not and needs to be updated to reflect the 1974 and 1996 side road orders. This will require a Legal Event Modification Order, which needs to be made in advance of the DCO. The Council requires clarification from Highways England as to the legal effect of the 1996 order as to whether it created a bridleway or not.

4.21. Any existing or new overbridges intended for equestrian use should have a 1.8m high parapet. Any deviation from this requires further discussion as to the precise detail. Highways England need to consider how improvements to the nearby accommodation bridge at Pill Bridge Lane, Ilchester, can be built into the scheme to not only achieve any economies of scale but also avoid the potential of a s130a Highways Act notice being served for obstruction of a bridleway.

4.22. The Council has recently received an application to modify the Definitive Map (see diagram below) which has the reference 851M. This is an application to upgrade the footpaths to bridleways. Highways England need to give very careful consideration as to how the scheme may impact or need to be modified, should the application be successful. The Council is also aware of potential applications for other equestrian routes in the area. Normally any development that may compromise a modification application is put on hold until such time as the application has been determined. Whilst we are not suggesting that this scheme is put on hold until such time as these applications have been determined beyond legal challenge (which could be many years), it is recommended that Highways England put forward a mitigation plan for discussion and formal agreement. The Council requests an early discussion regarding these matters. This is with a view to avoiding any unfortunate circumstances several years in the future, akin to the existing obstruction at nearby Pill Bridge Lane.



De-trunking and transfer of former Highways England assets to Somerset County Council.

4.23. The proposal provides for sections of the existing A303 to be replaced by a new route. The existing road, where superseded by the new route, will be 'detrunked', downgraded or stopped up as circumstances require. Redundant sections of road will revert either to The Council as the Local Highway Authority, or to private interests if stopped up.

4.24. The proposals do not identify the end uses of all parts of the road, but suggest that sections will need to be kept open for local use. For those sections which fall to the responsibility of the Council under DCO de-trunking procedures, it is normal practice for the Local Highway Authority to be compensated by Highways England for the additional maintenance burden the roads will present to the Council. The Council therefore needs to have agreed, when the DCO application is submitted, what the compensatory arrangements will be and what will be the end uses of all redundant sections of the A303 route. The Council urges Highways England to prioritise discussions on these matters within the programme going forward.

Requirements for local Traffic Regulation Orders.

4.25. The Council will need to be assured, before the DCO application is made, that all identified necessary TROs are included in the process, in particular that it is not left for the Council to address TROs necessary to regulate traffic on the existing county road network before, during or after construction, or on any de-trunked sections of the existing A303.

5.0.COMMENTS FROM SOMERSET COUNTY COUNCIL AS MINERALS AND WASTE PLANNING AUTHORITY

5.1. From a minerals perspective it is important that a suitable means of access is retained to West Camel Hill quarry.

5.2. Regarding waste matters: Subject to certain caveats, uncontaminated soil and other naturally occurring excavated material that is re-used on site is not subject to the Waste Management Acts. In line with the principles of the “waste hierarchy”, The Council is keen for excavated material to be re-used on site during the construction phase to provide embankments or other physical features of the road project. We thus seek a deliberate approach being taken to achieve an earthworks balance. If this principle is not followed, once excavated or otherwise removed, material may enter the control regime as set out by the Waste Management Acts.

6.0. ENVIRONMENTAL AND SOCIAL IMPACTS

Overview

6.1. The Council notes that initial environmental and social impact assessments have been undertaken and that consultation is ongoing with the statutory environmental bodies. The Council notes that there are varying levels of impact on Noise, Air Quality and Greenhouse Gases, Landscape, Archaeology, Listed Buildings, Historic Environment, Biodiversity, Water Environment, Physical Activity, Journey Quality and Severance.

6.2. At this stage in the process The Council refers Highways England primarily to South Somerset District Council and South West Heritage Trust consultation response in respect of matters of landscape and visual impact, air quality and emissions, cultural heritage, biodiversity and ecology, noise and vibration as set out below:

Cultural heritage (from SWHT)

6.3. The consultation document outlines the major issues concerning the cultural heritage with an assessment of the impacts on the designated and non-designated heritage assets. Historic England

are responsible for assessing the impacts on designated assets so this response concerns the non-designated assets (buried archaeology).

6.4. The document uses the DMRB Manual to describe the sensitivity of asset, magnitude of impact and significance of effect during the differing processes associated with the development. SWHT agrees with the conclusions of the initial assessment.

6.5. The conclusions clearly show that the information presented is incomplete and based on an initial desk-based review and consultation with SWHT/SSDC/HE. The further work described by the conclusions includes in-depth analysis of sources and impacts, geophysical survey, monitoring of geotechnical work and trial trenching. These will provide information on the significance of any buried assets and enable the design of a mitigation strategy.

6.6. The consultation document accords with professional practice and the assessment methodology described is in line with national standards.

Landscape and Heritage Impacts (from SSDC)

6.7. There will undoubtedly be landscape and heritage impacts arising from the proposed dualling of the A303. The effect of development upon Hazelgrove registered historic park and garden in particular will be both substantial and adverse, and the Council recognises that this will need to be balanced against public benefit.

6.8. The Council's Conservation Team has been in dialogue with the Highways England's design team and sit on the Environmental working Group, they are satisfied that the adverse effects identified for both Hazelgrove, and other points along the selected route, can be mitigated to a degree. This mitigation will be informed by the findings of both a landscape and visual impact assessment, and heritage assessment, within the EIA process. The ideas generated to date from dialogue with Highways England's design team has led to junction arrangements and a route alignment that will limit - as far as is possible – the extent of the adverse effects, and the Council will continue in that dialogue to seek to secure an outcome where adverse effect is minimised.

6.9. The Council urges Highways England to produce the landscape and visual impact assessment and heritage assessment as soon as possible give that the timeline to DCO submission is short. Sufficient time should be given to the Council to enable us to consider the contents of these reports and whether they have the potential to require further amendments to the scheme design before DCO submission.

Air Quality & Emissions, Noise & Vibration (from SSDC)

6.10. It is important to ensure the impacts of air quality and noise should be fully assessed and mitigated at all stages of the development in accordance with the Environmental Impact Assessment.

6.11. The Council were consulted on the EIA Scoping Report, where we stated that it would be useful to include the rationale for the LOAEL and SOAEL in table 12.1 and confirm that these are pre-mitigation levels for assessing noise impact. We would like to restate this comment to ensure that Highways England have addressed the matter.

6.12. Noise levels are, and continue, to cause concern locally, with the need to moderate noise impacts for residents of the park home site at West Camel raised, due to their construction these

home are not afforded the same level of noise protection as conventionally built residential properties.

- 6.13. Noise should be minimised through design from the outset, as such any new road should be built using quiet road surface, as reducing noise at source is normally more effective than trying to deal with noise after it has been generated.

Biodiversity and Ecology (from SSDC)

- 6.14. The Council's ecologist does not raise any particular concerns. The proposed scope of the Environmental Impact Assessment appears appropriate with regard to protected species and locally designated sites. The Council welcomes continued involvement of the ecologist in the Environment Working Group to ensure this continues to be the case as the scheme evolves to DCO submission.

- 6.15. As stated in the Council's comments to the EIA Scoping Report, South Somerset has a particularly low level of tree-cover (only around 4% as opposed to a national county average of 12%). A significant amount of new woodland plantings have been undertaken within and adjoining the areas of affected by the proposed scheme and it is likely that the removal of a large quantity of adjoining trees and hedgerows will be required. The Council's Arboricultural officer welcomes involvement in the Environment Working Group to explore possible mitigation measures.

Biodiversity (from SCC)

- 6.16. As surveys were carried out in 2017 it is surprising that these have not been included in the biodiversity section as least in summary to inform the response.

- 6.17. Table 8.2 sets out an evaluation of ecological receptors a number of which should be listed as s41 priority habitats (of the Natural Environment and Rural Communities Act 2006) nationally. The local BAP is no longer extant and has not been updated on expiry. It is considered that calcareous grassland and parkland is of national not regional importance as stated. Local Wildlife Sites can also support features of national importance, e.g. parkland and veteran trees, and it should not be considered that all have potential for substitution. Note that SSSI are only a sample of nationally important wildlife sites. Barn owls, as opposed to 'breeding birds', are listed on Schedule 1 of the Wildlife and Countryside Act 1981 (as amended) and are an s41 priority species so would consider the species to be of more than regional value.

- 6.18. The assessment also needs to take account of the Somerset Ecological Network, which is not mentioned in the biodiversity section. This shows areas of habitat networks, e.g. priority grassland, woodland, etc., in core areas, stepping stones and matrix habitats.

- 6.19. The Study Area is confined to a zone of influence around the proposed scheme of up to 2km for various ecological receptors. However, no zone of influence is given for bats which is surprising as these are highly mobile species which can forage at some distance from their roost sites and are likely to be affected by fragmentation due to the increased width of road. In addition, the proposed scheme as well as affecting access to foraging areas could also affect migratory movements between summer and winter roost sites. Potentially the 'Favourable Conservation Status' of local populations of these European protected species could be affected. Although it is stated that bat activity and roost surveys have occurred no details are given to give informed comment on these.

- 6.20. The Council disagrees in part with Paragraph 8.10.16 which states that ‘The existing A303 is also considered to be an existing barrier to bats due to the frequent use of HGVs. Therefore, the development of the scheme is not going to create a new barrier to dispersal as the existing baseline already has this present’. In general this paragraph lacks evidence to support its views. This is currently a single width highway of two or three lanes width. Bats are quite capable of crossing roads especially at night when dark and the frequency of use during the night, from experience, is not sufficient to present to a barrier to all species. For example see Lesiński, G., Sikora, A. & Olszewski, A. (2010). Bat casualties on a road crossing a mosaic landscape. *Eur. J. Wildl. Res.* 57. 217-223. Sufficient bat activity surveys should have been carried out to identify where bats are crossing and proven mitigation methods used to provide a safe passage post construction included within the scheme.
- 6.21. Lighting mitigation should also consider the use of back and/or side shields to reduce impacts on habitats for light sensitive species.
- 6.22. A dead otter was found on the A303 just east of the Sparkford roundabout a few years ago.
- 6.23. It appears that no surveys for deer were carried out.
- 6.24. The tables at the end of the section give a slight adverse response for a number of receptors, including woodland, parkland, hedgerows, bats, etc. This is concerning where a ‘no net loss’ should be sought and indicates a lack of mitigating measures or enhancements to compensate for biodiversity losses.

Community Impacts (from SSDC)

- 6.25. The Council supports the provision for non-motorised users as set in Figure 5 of the consultation document. However we are aware that a resident of Downhead has voiced concerns in respect of “the convoluted equestrian and pedestrian route that would be necessary to cross the A303”. The Council’s view is that safety is paramount and it is difficult to see how this could otherwise be improved in a safe manner. Nevertheless Highways England should consider this comment prior to any finalisation of the design.
- 6.26. To ensure that route-reliant businesses and visitor attractions are not adversely affected, Highways England should give further details on the location and nature of advance and approach signage along the proposed new route.
- 6.27. During the construction of the new route, to ensure minimum disruption locally, the Council requests that Highways England considers maintaining local access, mitigating traffic and temporary signage, together with the implementation of an enforcement regime using ANPR to ensure compliance with temporary Road Traffic Orders.
- 6.28. Locally, there is a desire for Highways England to revisit the retention of the “old” A303 as a local route between Podimore and Hazelgrove roundabouts to improve resilience of the network. This option provides the additional benefit of potentially supporting existing local businesses that are largely dependent on trade from the A303 and assist the movement of slower moving traffic such as agricultural traffic and cyclists who are unable to use an Expressway.

Community Impacts (from SCC)

6.29. Highways England should consider setting up a community fund scheme such as that put in place for the A14 Cambridge to Huntingdon Improvement. <https://www.cambscf.org.uk/A14.html>

7. Consultation and Engagement

7.1. Continued engagement with the affected communities, landowners, the Councils, environmental bodies and the South West Heritage Trust will be essential as Highways England develop their plans up to DCO to ensure potential community and environmental impacts of the preferred route are identified and mitigated.

7.2. The Council urges Highways England to set up an ongoing Community Forum to enable effective engagement with the most affected communities to ensure they are kept informed of progress and issues arising from the further scheme development.

END

APPENDIX A1 – SCC Infrastructure Programmes Group Engineering Design Response.

**** Separate Attachment: Report sa-6-0059-002-2 ****