

From: [REDACTED]
To: [A303 Sparkford to Ilchester](#)
Cc: Michelle.Luscombe@defra.gsi.gov.uk
Subject: response to deadline 6 from the South Somerset Bridleways Association
Date: 30 April 2019 15:52:18
Attachments: [Response for Deadline 6 April 30 2019.docx](#)

Michelle,

Here is a response for deadline 6. Please do ask if you have any queries or need clarification.

Thank you

Sarah Bucks
South Somerset Bridleways Association

A303 Sparkford – Ilchester dualling project

To: Examining Inspector, PINS,

From Sarah Bucks, Chair, South Somerset Bridleways Association

30th. April 2019

Our comments for DEADLINE 6

3.0.8 The social impacts of a network of NMU routes are important and improvements are welcome. The benefits of outdoor exercise are both mental and physical. The provision of NMU routes will provide safe off road routes for walkers, cyclists and equestrians of all ages.

3.0.10 MOD land. It now transpires that the proposed right of way along the southern edge of the MOD land at Camel Hill is only going to be dedicated as a footpath. This is a change from the original proposal which we understood was for bridleway status. The British Horse Society is consulting with the MOD to understand why, if a public right of way is to be dedicated, it could not include horse riders. On at least 2 occasions during this process the possibility of a tunnel or overbridge at the northern end of Gason or Traits Lane has been mooted to shorten the distance to the rights of way network from the east and north east. Had the MOD communicated their change of mind sooner, the designers of the DCO scheme might have been able to consider this idea more thoroughly. We understand that it is too late for this to be considered now. If only footpath rights are going to be dedicated, the proposed alternative route for equestrians is using Gason Lane, Blackwell Lane and Traits Lane. This is a 2.3 km diversion on roads rather than the 0.3 km route along the MOD land. This will also mean that riders from the stables at Camel Hill will have to ride over six and a quarter kilometres to reach the public rights of way network starting at the eastern end of Slate Lane. A round trip of around 13 kilometres for them if they should want to set hoof on a bridleway or restricted byway. This is too long for a diversion and will sever the network. We would like to suggest, in order of preference, the following possible ways of mitigating the situation:

- a) For the MOD to reconsider their current stance and revert to dedicating a bridleway along the southern edge of their land.
- b) Would it be possible to fit a restricted byway or bridleway along the northern side of the MOD land, so slipping it between the MOD land and the new carriageways? This is within the DCO land envelope but may only be possible if the new carriageways were slightly realigned.
- c) 'As the crow flies' it is less than 1 kilometre from the eastern end of Slate Lane to the public road at Camel Hill Farm. Would it be possible to compensate the landowner(s) to dedicate bridleway or restricted byway rights along the enclosed lane (approximately 300 meters long) leading eastwards from Slate Lane and across the one field (approximately 700 meters long) to the public road on the northern side of the A303 at Camel Hill. This will not involve buying land, but will secure a safe off road route and join up the network. The landowner(s) of the track and field will, I presume, already be receiving compensation for the use of his/their land as a construction track. Could compensation also be given to procure definitive bridleway or restricted byway rights over the land that has been set out and used as a construction track? The ownership of the land would still revert to the landowner.

d) If this cannot be achieved, could consideration to the bridge or tunnel at the northern end of either Traits Lane or Gason Lane to the public road at Camel Hill be reconsidered? This crossing is in use now, and will be stopped up within the DCO scheme and replaced by a diversion on roads to the Hazlegrove roundabout and back along the southern side of the A303 of over 2 kilometres. To add over another 2 kilometres to reach the northern end of Traits Lane, and another 2.4 kilometres to reach Slate Lane is an unrealistic length as a diversion.

3.4.2 Please could attention be given in the detailed design to the noise inside the tunnel, in particular the vehicular road surface, and also the echoing within the tunnel.

3.6.6 The scheme should, wherever possible, produce a network of NMU routes. Several of these are already shown in the plans, and more details of the designs would be welcome. There are also some important links which have not been included:

a) The overbridge at Podimore and link to Eastmead Lane – see 3.10.23

b) A link between Camel Cross and Podimore along tracks 4 and 9 and continuing westward into Podimore. This would, we understand, be possible if another quarter to half an acre of land was purchased to mitigate the problem with a pinch point at approximately ST 5553 2495. Could Designated Funds be applied for to purchase this land, and thus enable an NMU route of 1.25 kilometres linking Camel Cross with Podimore. This purchase would be excellent value of public money and make best use of maintenance tracks 4 and 9. Creating an NMU route here would, together with an NMU route over Podimore Bridge and along to Eastmead Lane, add rather than severe links between communities.

c) There is a footpath from the dead end public road behind Wayne's diner going northwards to the existing A303 westbound carriageway. When, as part of the dualling scheme, this carriageway is downgraded to a local road, could the section of footpath between the two be upgraded to a restricted byway, so connecting the dead end road with what will become a local road? This would require rights to be dedicated as the higher rights were legally extinguished over 20 years ago. This short section (60 meters?) would be a useful link to the NMU network and the width and surface are already in place. As this is outside the land envelope of the DCO scheme, could processing this upgrade be achieved by using Designated funds? Would such an application be best made by HE or their consultants? The land is not registered and presumably still belongs to the rating authority.

d) See comments relating to the MOD land, 3.0.10

3.6.7 The underbridge/tunnel. Ideally the NMU route should not be alongside the vehicular carriageways. Where this is to be the case, as much separation as possible should be designed. Raising the NMU surface well above oncoming headlights whilst not compromising the head height would be helpful, as would quiet surfacing on the vehicular carriageways and a non-echoing surface on the NMU route. Some sort of physical barrier is obviously essential and this should also have noise deadening properties. Lighting is important as vehicular headlights are often used in daylight and so disguising as much as possible with tunnel lights would be helpful.

3.7.2 An Expressway. This point has been mooted but we are told is not going to be taken forward for the foreseeable future. However, if and when such a designation was put on this stretch of road, we believe that the rights of horse riders and carriage drivers would be removed. What provision is being built into this scheme?

3.7.3 Safety at the Hazlegrave roundabout. The plans show a NMU route in the verge along the southern side of the roundabout, yet the written description was 'footway and cycle way'. Most people would deduce that 'footway and cycleway in verge' puts equestrians in the vehicular carriageway. If the situation suggests that pedestrians and cyclists would be safer on an NMU route, the same applies even more strongly for equestrians. Unless this is amended, a layperson's interpretation may be that equestrians must use the carriageway of the roundabout itself. This would be to ride clockwise from the southern end of the NMU tunnel across where the road coming from the westbound A303 off ramp comes onto the roundabout, share the space with the motorised traffic from the east and going south west on the A359. We think it is important that it is made clear that equestrians can use the verge, both clockwise and anti-clockwise, past the garage and across to the tunnel road so they are not obliged to ride on the roundabout carriageway. This may be clear to those with legal minds, but many people would assume that footway and cycleway excluded horses and that could make for awkward situations.

The sight lines to the south are not ideal on the A359 crossing point, and crossing both directions of traffic together is far from ideal. The situation would be greatly improved if a holding pen/chicane could be installed on the traffic island. This would involve increasing the size of the traffic island and thus the northbound carriageway of the A359 may have to take up some of the land on the south west corner of the verge, and the NMU route move over slightly. This appears to be possible within the DCO land envelope. The British Horse Society is able to produce designs for an appropriate post and rail structure.

If there is not space for an appropriate chicane, please could a Pegasus crossing be installed? This would only interrupt the traffic flow if and when vulnerable users wished to cross the northern end of the A359.

3.7.4 Without the overbridge, the non-motorised routes would be severed and there would be no crossing points between Podimore and Sparkford. We believe the Stert Hill overbridge is essential, as is the connection over the bridge at Podimore.

3.10.3 Definition of NMU route. Surely it is essential that all the NMU routes should be legally defined as either footpaths, cycle tracks, bridleways or restricted byways. Leaving it as NMU will cause the same confusions as 'RUPP's, 'ORPA's, 'occupation roads', 'private carriage roads', 'green lanes' and other loose terminology which provokes such heat at public inquiries, and could possibly need legislation in future years to clarify the meaning, possibly track by track. We feel that it is paramount that NMU routes are for all non-motorised and vulnerable users, i.e. walkers, cyclists, and all equestrians including carriage drivers. Thus the definitive status of these NMU routes should be restricted byway. Where there are site specific reasons that carriage drivers cannot be accommodated. The definitive status should be bridleway. This is a matter of safety as well as providing best value for public money.

3.10.19 Please see comments in 3.0.10 above relating to the construction track from the eastern end of Slate Lane to Camel Hill Farm.

3.10.23 We too would like the situation between Podimore and Eastmead Lane resolved to produce an NMU link. We were disappointed at the hearing on Friday 1st. March 2019 to hear that the intention was to revoke, without consultation, the side roads order which created this bridleway. Such rights were negotiated in good faith over a couple of decades ago, and it is not the fault of the horse riders that the surveying authority has not had the resources to correctly record and put in

place this bridleway. It had always been assumed that the Higher Farm Lane road bridge carried public vehicular rights as suggested by the speed limit and dead end signage. A DMMO application which includes highway maintenance record evidence has been submitted. We would hope that a new NMU route would be dedicated within the DCO land envelope on the south side of the hedge to replace Y30/29 as not doing so would be contrary to all HE policies on connectivity and making provision for all road users including equestrians and cyclists. The connection between Eastmead Lane and Podimore depends on this bridleway.

Since Eastmead Lane connects two restricted byways and there is already a DMMO application to upgrade Eastmead Lane to a restricted byway, the link from Higher Farm Lane to Eastmead Lane should also be of restricted byway status. We would hope definitive routes could be sorted out as part of the works, and not left to chance after the new road has been completed.

We believe the connection over Higher Farm Lane bridge is essential, but only relevant if the connection to Eastmead Lane is in place.