

**From:** [Jo Wilkins](#)  
**To:** [A303 Sparkford to Ilchester](#)  
**Subject:** TR010036 - Deadline 6  
**Date:** 01 May 2019 16:22:28  
**Attachments:** [image002.png](#)  
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[D6 Comments on submissions received by D5.pdf](#)

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Dear Ms Coffey

**PLANNING ACT 2008**  
**APPLICATION BY HIGHWAYS ENGLAND FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR THE A303 SPARKFORD TO ILCHESTER DUALLING**

**SUBMISSION MADE PURSUANT TO DEADLINE 6**

This submission is in response to the Examining Authority ("ExA") Rule 8 letter dated 21<sup>st</sup> December 2018 and comprises the relevant information requested from South Somerset District Council.

The submission includes the following: -

- South Somerset District Council's comments on D5 submissions.

South Somerset District Council's comments on the applicant's revised draft DCO will be forwarded later to-day.

Yours sincerely

Jo Wilkins

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**Application by Highways England for an Order Granting Development Consent for the A303 Sparkford to Ilchester Dualling Project (Case Ref: TR010036)**

**South Somerset District Council's Comments on Submissions Received by D5**

The District Council makes the following comments in relation to document 9.21 The Applicant's Environmental Mitigation Route Map:

Reference	Document Reference	Objective	Action (including specific location and any monitoring required)	Securing mechanism	South Somerset District Council Comments
B1	ES - CH8 (APP-045)	Protection and creation of priority habitats	<p>During works:</p> <ul style="list-style-type: none"> <li>• Where hedgerows are required to be removed to facilitate the works, these will be replaced within the same location and any existing gaps planted with appropriate native species. Topsoil, containing the seedbank, will be translocated from the woodland within Hazlegrove RPG (works numbers 100 and 101 on the works plans, <b>AS-004</b>) and used within the new areas of woodland creation, notably the area either side of Pepper Hill Copse.</li> <li>• Minimal topsoil to be applied for all grassland areas to encourage the establishment of nutrient poor species rich grassland.</li> <li>• To mitigate the loss of 2 veteran trees, the intact and will</li> </ul>	dDCO Schedule 2 (Requirements) Part 1 (Requirements) Requirement 3 (Construction Environmental Management Plan) Part (2) (a)	2 <sup>nd</sup> bullet: suggest that 'Minimal topsoil' is replaced 'with no topsoil' or 'top soil inverted with subsoil'.

			<p>ensure that the hulk of the tree continues to provide deadwood resource in the future.</p> <ul style="list-style-type: none"> <li>• Works to install vehicular access across the ditch within the main compound area would be supervised by an Ecological Clerk of Works to ensure that access is positioned in the most appropriate place to minimise potential habitat degradation.</li> <li>• Once works have been completed, the ditch habitat would be reinstated and enhanced. This would include removal of any material used to construct the crossing and planting of aquatic and marginal vegetation in line with the landscape masterplan.</li> </ul> <p>During operation:</p> <ul style="list-style-type: none"> <li>• ‘Cut and remove’ to be employed for grassland management (including amenity grassland) to reduce nutrient levels and increase diversity.</li> </ul>		
B2	ES – Confidential Badger Report which will be issued to the PC.	Protection of badgers	<p>Before works:</p> <ul style="list-style-type: none"> <li>• In advance of construction works commencing on site, a badger survey would be undertaken to ensure that the status of the setts remains the same and also to identify any additional setts which may have</li> </ul>	dDCO Schedule 2 (Requirements) Part 1 (Requirements) Requirement 3 (Construction Environmental Management Plan)	A Development Licence is required from Natural England under the Protection of Badgers Act 1992.

			<p>been excavated within the construction footprint since.</p> <ul style="list-style-type: none"><li>• Permanent closure of setts 1a, 1b, 1c, sett 19, sett 30 and sett 64 (licensable period is between 1 July – 30 November, with 21 clear days of badger activity required).</li><li>• Temporary closure of setts 5,18,63 (licensable period is between 1 July – 30 November, with 21 clear days of badger activity required).</li><li>• Refer to Appendix D of the Confidential Badger Report for the badger sett mitigation locations.</li></ul> <p>During works:</p> <ul style="list-style-type: none"><li>• Cover open excavations or provide ramps.</li><li>• Exclusion zone of 30 metres for all works around the retained badger setts (or until the exclusion of badger setts to be closed has been completed, for those being permanently closed).</li><li>• Refer to Appendix B of the Confidential Badger Report for badger sett locations.</li></ul> <p>Operational:</p>		
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			<ul style="list-style-type: none"> <li>• Installation of badger tunnel and badger fencing and around the tunnel.</li> <li>• Monitoring of badger tunnel, twice annually for 2 years.</li> </ul>		
B3	ES - CH8 and Bat Technical Report ( <b>Appendix 8.4, APP-077</b> )	Protection of bats	<ul style="list-style-type: none"> <li>• Before works: An internal inspection of the building (F001 at land parcel WS64408, grid reference ST581256) to be scheduled a year prior to the planned demolition, along with emergence and re-entry surveys. Results from these surveys to be used to determine whether roosts within the building have become active again, and therefore the need for an EPS licence.</li> <li>• Installation of a bat house within suitable habitat, to mitigate the loss of building F001 at land parcel WS64408.</li> <li>• Temporary hop overs installed, using sizeable trees placed in tubs or dead hedging, approximately 220m east of Canegore Corner, which links to the northern soil bund vegetated with trees and edges, leading to Steart Wood.</li> </ul> <p>During works:</p> <ul style="list-style-type: none"> <li>• Building F001 to be re-surveyed for bats 1 year prior to</li> </ul>	dDCO Schedule 2 (Requirements) Part 1 (Requirements) Requirement 3 (Construction Environmental Management Plan)	Depending on the distance between trees, hop overs would be ineffective for some species as they are likely to immediately drop to ground level once in the open gap. Planted tubs between the two points should be considered at night and removed in the morning when access is required.

			<p>demolition. Building to be subject to a soft strip immediately prior to demolition.</p> <ul style="list-style-type: none"><li>• Bat house to be constructed within ecological mitigation area to the east of F001.</li><li>• Habitat on site to be retained where possible; habitat loss to be minimised.</li><li>• Where hedgerows require removal only during the construction phase, hedgerows to be reinstated and enhanced</li><li>• Hedgerow removal to be minimised where possible, and gaps restricted to 10m wide where this is feasible to reduce the potential for severing commuting lines. However, there are areas within the scheme where larger extents of hedgerow require removal to accommodate the scheme design.</li><li>• All areas of hedgerow to be retained must be fenced to prevent encroachment of plant and materials.</li><li>• Buffer zones of at least 10m to be retained between construction activities and all hedgerows and woodland, and a buffer of at least 15m to be retained between construction activities and any trees and</li></ul>		
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			<p>buildings, where roosts have been identified. It is not possible to retain a 15m buffer between works and roosts WS56543; ST106774 and ST84283. However, WS56543 is inactive and works within 15m of ST106774 are minor and will not lead to disturbance impacts. Works are proposed 14.5m from ST84283 (supporting a small number of common species); this buffer is considered appropriate. Please refer to Figure E.7 of <b>Appendix 8.4 Bat Technical Report (document reference TR010036/APP/6.3)</b> for confirmed bat roost locations.</p> <ul style="list-style-type: none"><li>• 'Dead hedging' to be put in place to maintain linear features during construction.</li><li>• Night time working to be avoided where possible to minimise the need for artificial lighting.</li><li>• Where artificial lighting is required, directional and wildlife sensitive lighting to be used to prevent light spill onto hedgerows and treelines.</li><li>• Approximately 60 bat boxes to be installed within suitable habitats adjacent to the scheme (location of boxes to</li></ul>		
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			<p>be determined during detailed design). Bat boxes will be of a range of designs to support a variety of different bat species.</p> <ul style="list-style-type: none"><li>• All trees to be felled for the scheme should be re-inspected for roosting bats prior to felling. This should comprise climb and inspect surveys with endoscopes.</li><li>• Where no further evidence of bats is identified, then trees must be soft felled, and left on the ground for at least 1 day before being disposed of.</li><li>• Where evidence of bats is recorded, the tree must not be felled as further emergence and return surveys may be required to establish which species of bat is roosting within the tree, and the type of roost. Natural England will then need to be consulted and an EPSM licence prepared.</li></ul> <p>Operational</p> <ul style="list-style-type: none"><li>• Planting of mature trees to act as a hop over for the hedgerow approximately 220m east of Canegore Corner, which links to the northern soil bund vegetated with trees and edges, leading to Steart Wood. In addition, planting to encourage bats to</li></ul>		
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			<p>use the nearby underbridge (located to the west) and potentially installing illuminated bollards in the verge to deter species, such as lesser horseshow bats, crossing the road should be considered during the detailed design. South Somerset District Council should be consulted on the detailed design for mitigation in this location.</p> <ul style="list-style-type: none"> <li>• Annual monitoring of bat boxes and bat house for 3 years post construction.</li> <li>• Annual crossing point surveys at locations which were subject to severance, 3 years post construction.</li> <li>• Annual landscape scale transects, 3 years post construction.</li> </ul>		
B7	ES - CH8 and Hazel Dormouse Technical Report ( <b>Appendix 8.8, APP-081</b> )	Protection of hazel dormice	<ul style="list-style-type: none"> <li>• Before works: Prior to any clearance of woodland, scrub or hedgerow vegetation, personnel should receive a toolbox talk by a suitably qualified ecologist, covering the identification, ecology, conservation status and legislative protection of dormice.</li> <li>• All retained woodland and hedgerow habitat to be fenced off so that it is protected from</li> </ul>	dDCO Schedule 2 (Requirements) Part 1 (Requirements) Requirement 3 (Construction Environmental Management Plan)	Suggest adding that vegetation to be cleared is checked by a licensed dormouse ecologist prior to removal. If found, an EPS licence would be required.

			physical disturbance during the construction phase.		
N/A	ES - CH8 (APP-045)	Measures embedded in the scheme design to reduce or eliminate adverse effects on badgers in operation	Where badgers are affected the most at Hazlegrove House RPG, habitat creation would be undertaken to provide foraging habitats of higher quality than the existing. These would include the new attenuation and wildlife ponds and surrounds, woodland, trees and species-rich grassland. The landscape would also provide opportunities for badger sett creation.	dDCO Schedule 2 (Requirements) Part 1 (Requirements) Requirement 5 (Landscaping, Requirement 6 (Implementation and maintenance of landscaping) and Requirement 10 (Protected species)	A Badger underpass is not mentioned.
N/A	ES - CH8 (APP-045)	Measures embedded in the scheme design to reduce or eliminate adverse effects on barn owls in operation	To potentially reduce the number of barn owls killed by vehicles, barn owls should be encouraged to fly over the road at a height of at least 3 metres. This would be achieved by planting continuous hedges and shrubs and trees greater than 3 metres high adjacent to the carriageway along both sides of the road as screening. This would encourage barn owls to fly up and over the passing vehicles.  Areas of rough species-rich grassland would be created away from the road verge to provide barn owls with foraging habitat. Thirteen additional nest	dDCO Schedule 2 (Requirements) Part 1 (Requirements) Requirement 5 (Landscaping, Requirement 6 (Implementation and maintenance of landscaping) and Requirement 10 (Protected species)	The Barn Owl Trust recommends: <ul style="list-style-type: none"> <li>• Plant high hedges or lines of closely-spaced trees <u>next to the road surface</u> on both sides.</li> <li>• Or, plant trees 3-4 metres back from the road-edge and allow the side branches to reach within 1 metre of the road surface.</li> </ul>

			<p>boxes would be provided at least every 1 kilometre. Boxes should be installed where there is suitable roosting and foraging habitat. It is recommended that these are placed no closer than 1 kilometre, ideally 3 kilometres, from the scheme and in pairs within 500 metres of each other at a density of about 1 pair per kilometre.</p> <p>As barn owls are nocturnal, light emissions from the road would be minimised by using directed luminaires and back plates to reduce spill.</p>		
N/A	ES - CH8 (APP-045)	Measures embedded in the scheme design to reduce or eliminate adverse effects on brown hairstreak in operation	<p>New hedgerows would be planted at an amount equivalent to hedgerow loss. The new hedgerows would incorporate native broadleaved trees with frequent or occasional blackthorn. Where possible, the new hedgerow planting would be undertaken prior to vegetation clearance to allow brown hairstreak to colonise new planting. The hedgerows would connect to existing hedgerows to retain the connectivity of the habitat and prevent habitat fragmentation.</p>	dDCO Schedule 2 (Requirements) Part 1 (Requirements) Requirement 5 (Landscaping, Requirement 6 (Implementation and maintenance of landscaping) and Requirement 10 (Protected species)	Hedgerows need to be planted so that there is enhancement not merely an equivalent. For example, frequent trees and diverse species. Operational management will determine value following construction, e.g. need to be tall, wide and bushy.

N/A	ES – CH11 (APP-049)	Embedded design measures to mitigate noise emissions on communities in operation	<p>The mitigation within the design includes consideration of horizontal alignment, use of cuttings and embankments, noise barriers and low-noise running surfaces.</p> <p>Four barriers would be included along the alignment of the A303, 1 located at a property known as The Spinney, 1 located at Steart Hill and 2 located near Camel Hill. A total of 7 bunds would be provided along the scheme. Two bunds would be located towards the western end of the scheme, where the B3151 joins the A303 near Hawk House, another would be located to the east of Downhead junction, a false cutting would be provided between Howell Hill and Traits Lane, and 3 false cuttings would be provided at Hazlegrove Junction.</p> <p>A thin surface course would be applied to new carriageways associated with the scheme. These measures are all included on the Environmental Masterplan.</p>	dDCO Schedule 2 (Requirements) Part 1 (Requirements) Requirement 14 (Noise Mitigation)	Details of the physical dimensions of the noise bund or any other barriers that are required to mitigate the noise impact at the two noise sensitive properties – The Spinney and Annis Hill Farm should be provided. It is important that SSDC understands this mitigation so that we can ensure the design implementation is completed.
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