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Subject: A303 Sparkford to Ilchester Dualling - Deadline 6a Submission
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Attachments: [9.33 Responses to the Examining Authority's Third Written Questions - Rev A.PDF](#)
[Highways England Deadline 6a Submission Cover Letter.pdf](#)

Dear Michele

Please see the below list of documents that form the Deadline 6a submission from Highways England.

To confirm, the submission for Deadline 6a encompasses the following:

- Highways England Deadline 6a Submission Cover Letter
- 9.33 Responses to the Examining Authority's Third Round of Written Questions

If you have any queries, please don't hesitate to get in touch.

Kind regards

Elliot

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03 May 2019

Dear Sir/Madam

A303 Sparkford to Ilchester Dualling Development Consent Order – Deadline 6a Cover Letter

Deadline 6a submission

Please see below a list of documents that form the Deadline 6a submission from Highways England:

- 9.33 Responses to the Examining Authority's Third Round of Written Questions

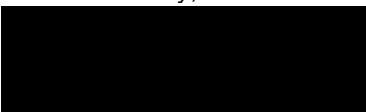
Response to Deadline 6 submission

The Applicant notes the detailed submissions made by South Somerset District Council (SSDC) and Somerset County Council (SCC) on the draft Development Consent Order (dDCO) at deadline 6. The Applicant has not had time to consider and respond meaningfully to those submissions by this deadline but intends to do so ahead of the hearings in order to make the time during the hearings as productive as possible.

The Applicant notes that SCC has submitted draft protective provisions and advises that these are not agreed by the Applicant. The Applicant and SCC had been discussing these and SCC is aware that the drafting submitted at D6 does not reflect what the Applicant has said it would include in those provisions. In particular, the Applicant does not agree that SCC approval of all detailed design should be required or that SCC should be paid as provided for in their draft.

Despite meeting with SCC to discuss these provisions in late April, SCC did not advise they intended to submit this draft or the Applicant would have submitted its draft at D6 as well. The Applicant considers that it is only fair and reasonable and of assistance to the forthcoming DCO hearing that both drafts are before the Examining Authority. Accordingly, a further submission on the protective provisions will be made before the hearings.

Yours sincerely,



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Highways England Project Manager
A303 Sparkford to Ilchester Project Team

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A303 Sparkford to Ilchester Dualling Scheme TR010036

9.33 Responses to the Examining Authority's Third Written Questions

Planning Act 2008

May 2019



Infrastructure Planning

Planning Act 2008

A303 Sparkford to Ilchester Dualling Scheme

Development Consent Order 201[X]

Responses to the Examining Authority's Third Written Questions

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1 Responses to the Examining Authority's Third Written Questions

1.1.1 This report provides the Applicant's responses to the Examining Authority's Third Written Questions during the Development Consent Order (DCO) Examination for the A303 Sparkford to Ilchester Dualling Scheme (hereafter referred to as 'the scheme').

1.1.2 Responses to these Written Questions are contained within Table 1.1 below.

Table 1.1: Responses to the Examining Authority's Third Written Questions

EXQ3	Question to	Question	The Applicant's Response
3.0	General and Cross-topic Questions		
3.0.1	The Applicant	<p>Policy Balance</p> <p>There are a number of areas where the scheme has the potential to give rise to harm. These include but are not limited to the effect on historic heritage and biodiversity. The NPSNN requires such harm to be balanced against the public benefits of the scheme, taking account of whether the over-riding public interest justifies the proposal.</p> <p>Should the ExA find that there is harm, what matters does the Applicant consider that the ExA should take into account when assessing the benefits of the scheme?</p>	<p>Paragraph 4.2 of the National Policy Statement for National Networks (NPSNN) makes it clear that: <i>“Subject to the detailed policies and protections in this NPS, and the legal constraints set out in the Planning Act, there is a presumption in favour of granting development consent for national networks NSIPs that fall within the need for infrastructure established in this NPS.”</i></p> <p>Importantly, the NPSNN also recognises that <i>“some developments will have some adverse local impacts on noise, emissions, landscape/visual amenity, biodiversity, cultural heritage and water resources.”</i> Paragraph 3.4 goes on to state that <i>“whilst applicants should deliver developments in accordance with Government policy and in an environmentally sensitive way, including considering opportunities to deliver environmental benefits, some adverse local effects of development may remain”</i>.</p> <p>The NPSNN provides guidance to the Examining Authority (ExA) and the Secretary of State (SoS) on what factors to take into account in the planning balance; paragraph 4.3 states: <i>“In considering any proposed development, and in particular, when weighing its adverse impacts against its benefits, the Examining Authority and the Secretary of State should take into account:</i></p> <ul style="list-style-type: none"> • <i>Its potential benefits, including the facilitation of economic development, including job creation, housing and environmental improvement, and any long-term or wider benefits;</i> • <i>Its potential adverse impacts, including any longer-term and cumulative adverse impacts, as well as any measures to avoid, reduce or compensate for any adverse impacts.</i> <p>This clarification is important as it demonstrates the approach to assessment that the ExA and SoS must take.</p>

EXQ3	Question to	Question	The Applicant's Response
			<p><u>Over-riding public interest</u></p> <p>The Applicant disputes the assertion in question 3.0.1 that the NPSNN requires the ExA to take account of whether the proposal is justified by an over-riding public interest. This is not a planning test (of over-riding public interest) set out in either the Act or the NPSNN. To apply this would be to apply the wrong planning test to the application and place any decision based on this approach at risk of legal challenge.</p> <p>The only reference within the NPSNN to 'over-riding public interest' is in respect of proposals where it is impossible to rule out an adverse effect on the integrity of a European site. In such an instance, this forms one of three tests that need to be met to apply for derogation from the Habitats Directive. As demonstrated in the Habitats Regulations Assessment Finding of No Significant Effects Report (APP-147) this is a very specific and clearly defined circumstance which does not apply to this scheme.</p> <p>The NPSNN clearly states (paragraph 2.2) that "<i>There is a critical need to improve the national networks to address road congestion and crowding on the railways to provide safe, expeditious and resilient networks that better support social and economic activity; and to provide a transport network that is capable of stimulating and supporting economic growth.</i>" This is further clarified in the NPSNN in the following paragraphs:</p> <p>Paragraph 2.10: "<i>The Government has therefore concluded that at a strategic level there is a compelling need for development of the national networks – both as individual networks and as an integrated system. The Examining Authority and the Secretary of State should therefore start their assessment of applications for infrastructure covered by this NPS on that basis</i>".</p> <p>Paragraph 2.22: "<i>Without improving the road network, including its performance, it will be difficult to support further economic development, employment and housing and this will impede economic growth and reduce people's quality of life</i>".</p>

EXQ3	Question to	Question	The Applicant's Response
			<p>With respect to balancing potential harm and benefits, Chapter 2 of the NPSNN sets out the need case for the development of national networks and the Government's policy, including the benefits from meeting this need. The summary box at the start of Chapter 2 titled <i>'Government's vision and strategic objectives for the national networks'</i>, summarises this as meaning:</p> <ul style="list-style-type: none"> • <i>"Networks with the capacity and connectivity and resilience to support national and local economic activity and facilitate growth and create jobs.</i> • <i>Networks which support and improve journey quality, reliability and safety.</i> • <i>Networks which support the delivery of environmental goals and move to a low carbon economy.</i> • <i>Networks which join up our communities and link effectively to each other."</i> <p>Schemes that are brought forward in line with the process set out in the NPSNN are therefore considered to contribute to achieving these outcomes. Paragraph 2.23 of the NPSNN is of particular relevance, stating that in order to implement the Government's wider policy to address need, enhancements will include <i>"improvements to trunk roads, in particular dualling of single carriageway strategic trunk roads..."</i></p> <p>This scheme will demonstrably contribute to the achievement of strategic objectives set out in the NPSNN.</p> <p>Therefore, even though the NPSNN does not include a specific test for over-riding public need in the overall planning balance, it could be argued that this need is established by the NPSNN through its assessment of transport demand and the drivers for growth. In this regard, the NPSNN states at paragraph 4.6: <i>"The Examining Authority and the Secretary of State do not need to be concerned with the national methodology and national assumptions around the key drivers of transport demand"</i>.</p>

EXQ3	Question to	Question	The Applicant's Response
			<p>In terms of the consideration of the impacts and benefits of the scheme, paragraph 4.5 of the NPSNN advises that schemes developed using DfT's Business Case guidance and WebTAG guidance <i>"will assess the economic, environmental and social impacts of a development..."</i> and that this information <i>"...will be important for the Examining Authority and Secretary of State's consideration of the adverse impacts and benefits of the proposed development."</i></p> <p>As stated in paragraph 6.1.2, 6.1.3, 6.1.9 and Appendix 2 of the Case for the Scheme (APP-149), the proposed dualling of the A303 has been developed using the Department for Transport's (DfT) Business Case and WebTAG guidance. Not only should the ExA and SoS take account of the benefits set out in this document, it should also recognise the balancing exercise that is inherent to the process set out by the NPSNN.</p> <p>Paragraph 4.27 of the NPSNN is also relevant to the consideration of the planning balance for this scheme. It states that <i>"[w]here projects have been subject to full options appraisal in achieving their status within Road and Rail Investment Strategies...option testing need not be considered by the examining authority or the decision maker. For national road and rail schemes, proportionate option consideration of alternatives will have been undertaken as part of the investment decision making process. It is not necessary for the Examining Authority and the decision maker to reconsider this process but they should be satisfied that this assessment has been undertaken."</i></p> <p>This is relevant in answer to question 3.0.1 as it demonstrates that the Applicant has followed a robust process to determine that this scheme provides the benefits set out in the business case and therefore the findings of that process should be taken into account in the planning balance.</p> <p>As set out in section 3.6 of the Case of the Scheme (APP-149), this scheme has been identified in Highways England Delivery Plan and Strategic Business Plan 2015-2020 to ensure consistency with the National Infrastructure Delivery Plan and Road Investment Strategy</p>

EXQ3	Question to	Question	The Applicant's Response
			<p>(RIS) 2015 - 2020. As set out in paragraph 4.1.3 of the Case for the Scheme (APP-149), this has helped identify seven scheme-specific objectives to deliver the strategic and local benefits and reduce potential for harm. These are set out below with cross-references to further evidence:</p> <ul style="list-style-type: none"> Capacity: Reduce delays and queues that occur during peak hours at seasonal times of the year. The Transport Report (APP-150) submitted by Highways England presents a transport model which assesses three weekday time periods that are consistent with the West Regional Traffic Model. These periods include an average AM peak hour period (07:00-10:00), an average hour in the inter-peak (10:00-16:00) and average PM peak period (16:00-19:00). In addition, a summer peak model was produced. Section 8 of the Transport Report (APP-150) refers to the wider impacts of the proposed development. Paragraph 8.1.2 of the Transport Report (APP-150) sets out that <i>“there is a decrease in journey times from the Do Minimum to Do Something across 2023 and 2038 and all time periods, indicating that the scheme is providing quicker journeys along the A303 corridor from Ilminster to Mere in both directions despite the fact that the scheme attracts higher flows”</i>. Table 8.1 and paragraphs 8.1.3 and 8.1.4 present the average savings in the eastbound direction (A303 Ilminster to Mere) across the three weekday periods are 02:12 (mm:ss) in 2023 and 02:33 (mm:ss) in 2038. In the westbound direction (A303 Mere to Ilminster), the scheme saves an average 01:30 (mm:ss) in 2023 and 02:15 (mm:ss) in 2038 across the three weekday time periods. Savings during the summer peaks are higher still for both directions. These savings will support economic development as envisaged by the NPSNN. Safety: Improve safety for all users of the A303 between Sparkford and Ilchester, as well as the wider A303 / A358 corridor. Section 9.2 of the Transport Report (APP-150)

EXQ3	Question to	Question	The Applicant's Response
			<p>shows that the scheme will result in significant safety improvements, based on a Cost and Benefit to Accidents – Light Touch model (COBALT). Paragraph 9.2.3 states a benefit generated by the scheme as traffic flows shift from poor quality links and junctions to those of higher quality, therefore providing safer links and junctions. Furthermore, Figure 9.3 in the Transport Report (APP-150) shows disbenefits in the A303 corridor as a result of more traffic from the M4 / M5, but the corridor will experience larger benefits locally due to the scheme and strategic alternative routes along the A303. Paragraph 9.2.5 concludes that “<i>the net result is a significant saving in collisions over the appraisal period</i>”.</p> <ul style="list-style-type: none"> • Support economic growth: Facilitate growth in jobs and housing by providing a free-flowing and reliable connection between the south east and the south west. As part of the Transport Assessment, an Analysis of Monetised Costs and Benefits was undertaken, and the results indicate that the proposed scheme is capable of providing an adjusted Benefits to Cost Ratio (including wider economic and reliability benefits) of 1.71. The DfT's value for money criteria demonstrates this scheme would provide medium value for money, however, in the overall value for money assessment of the scheme, other qualitative factors that cannot be monetised are taken into account. The Appraisal Summary Table (APP-151 Appendix M) presents that business users will benefit from the scheme as it provides a free-flowing route which decreases journey times. It is indicated that the assessment predicts value of journey time changes as £122.2m. In addition, travel time reliability benefits would occur and are estimated as £16.4m for all users, see Table 8.3 of the Transport Report (APP-150). • Environment: Avoid unacceptable impacts on the surrounding natural and historic environment and landscape and optimise opportunities for enhancement. The Environmental Statement (including main chapters, technical

EXQ3	Question to	Question	The Applicant's Response
			<p>appendices and supporting figures) present the Environmental Impact Assessment undertaken for the proposed scheme, detailing any mitigation techniques required to reduce adverse effects found. Furthermore, the Outline Environmental Management Plan (OEMP) (REP5-013) is updated through the examination period and documents these measures.</p> <ul style="list-style-type: none"> Local communities: Reduce community severance and promote opportunities for improving their quality of life. Within, Chapter 12 People and Communities of the Environmental Statement (APP-049), paragraph 12.10.54 sets out that during operation, the scheme would provide benefits to the local communities, as the proposed improvements would lead to improved access to community facilities. Connectivity: Improve the connectivity of the south west to the rest of the UK and improve business and growth prospects. The Transport Report (APP-150) presents the impacts of the scheme on the strategic routes and networks in the wider area. Paragraph 7.1.8 states that <i>“the results shown in section 7.1 suggest that the scheme makes the A303 corridor more attractive to traffic from zones near London and south-east zones”</i>, presenting the opportunity to improve business and growth prospects. Resilience: Improve journey time reliability and resilience and provide extra capacity to make it easier to manage traffic when incidents occur. Travel time reliability benefits occur with the improved capacity of the dual carriageway scheme. These were estimated as part of the economic assessment summarised in the Transport Report [App-150]. Further detail on the analysis is contained in the Combined Modelling and Appraisal Report [App-151] in paragraphs 13.3.19 to 13.3.23 which describes how the standard deviation of journey times on single and dual carriageway sections of the A303 have been compared to assess the benefits of implementing the dual carriageway scheme.

EXQ3	Question to	Question	The Applicant's Response
			<p>Dealing specifically with harm, the NPSNN takes care to specify how potential harm should be considered in relation to different circumstances with reference to the mitigation measures proposed. Specifically, paragraphs 5.20 to 5.35 set out how the planning balance should be considered and is structured to differentiate how the ExA and SoS should approach the planning balance for different levels of designation. NPSNN states (in Footnote 78) that the term 'harm' should be understood to mean significant harm.</p> <p>Potential harm to biodiversity is summarised in paragraphs 8.12.1 to 8.12.12 of Chapter 8 Biodiversity of the Environmental Statement (APP-045). The Case for the Scheme (APP-149) sets out how this identified harm has been mitigated with reference to paragraphs 5.20 to 5.35 of the NPSNN. All mitigation measures are set out in the OEMP (REP5-013).</p> <p>This demonstrates that, building on a thorough consideration of the national need and benefits in accordance with the NPSNN, a compliant assessment of impacts in line with the Infrastructure Planning (Environment Impact Assessment) Regulations 2017, any identified potential harm in respect of biodiversity has been identified, quantified and reduced as far as possible through mitigation in accordance with the approach set out by the NPSNN.</p> <p>In respect of the historic environment, paragraph 5.134 of NPSNN makes clear that <i>"where the proposed development will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal..."</i></p> <p>The identified harm on heritage assets is set out in paragraphs 6.13.1 to 6.13.4 of Chapter 6 Cultural Heritage of the Environmental Statement (APP-043) including the mitigation measures proposed.</p> <p>No substantial adverse impact to heritage assets has been identified, and a moderate adverse impact on the Hazlegrove House Registered</p>

EXQ3	Question to	Question	The Applicant's Response
			<p>Park and Garden (RPG) has been identified. Therefore paragraph 5.134 of NPSNN is the appropriate policy text for the ExA to consider as part of the overall planning balance. This demonstrates that the Applicant has been committed to avoiding or minimising conflict between conservation of a heritage asset and the impacts of aspects of the scheme in line with paragraph 5.129 of the NPSNN.</p> <p>The NPSNN does not limit the definition of 'public benefits' specified in paragraph 5.134, and the ExA should therefore include the national, regional and local benefits of the scheme in its entirety as set out in answer to this question 3.0.1.</p> <p>In terms of the wider benefits of the proposal, the economic impacts on employment sites within the Local Plan are set out in the Applicant's response to Question 3.0.9.</p> <p><u>Conclusion</u> The Environmental Statement submitted with the application demonstrates that the overall in combination residual effects of the scheme will be Moderate Adverse during construction, and Slight Adverse during operation. The scheme has the potential to contribute to the realisation of significant economic growth within the wider region and will also deliver improvements in terms of safety, resilience, connectivity, and reduction in community severance.</p> <p>The NPSNN highlights the potential wider economic benefits of road improvement schemes and also recognises that some developments will have "<i>some adverse local impacts on noise, emissions, landscape/visual amenity, biodiversity, cultural heritage and water resources</i>", and that "<i>some adverse local effects of development may remain</i>" (para. 3.4). Whilst the scheme may result in a slight adverse impact within the local area, this is entirely in accordance with the NPSNN and the contribution the scheme will make to the delivery of the Government's vision and objectives for the strategic road network.</p> <p>Although NPSs are the primary planning policy documents for decision making on NSIPs, development plans are still relevant to the scheme</p>

EXQ3	Question to	Question	The Applicant's Response
			<p>as they provide local land use designations and allocate land for future development. The local plans and policies deemed relevant to the scheme are detailed within Section 7.4 of the Case for the Scheme (APP-149), including justification as to how the scheme meets the identified policy requirements.</p>
3.0.2	The Applicant	<p>OEMP In the Applicant's Written Submissions of Oral Case at Hearings response at paragraph 5.2.8 [REP4-020] it is stated: "the OEMP to be submitted at Deadline 5 will provide a very broad indication of the extent to which construction vehicles may use surrounding roads".</p> <p>Paragraph 2.2.1 of the Outline Traffic Management Plan in the OEMP [REP5-013] says "Some of the minor side roads will have heavy plant crossings with traffic signal control." This would imply that no minor roads are to be used for construction traffic other than crossings.</p> <p>Could the Applicant please confirm whether minor roads will be used during construction, and if so, can the Applicant state which minor roads will be used?</p>	<p>The Applicant would like to highlight paragraphs 2.2.2, 2.2.3 and 2.3.4 and Figure 2.5 of the Outline Traffic Management Plan (Annex B.5 to REP5-013). Collectively these state that:</p> <ul style="list-style-type: none"> • Delivery routes to site will be from the east and west via the A303 and from the south via the A37. • The A359 has a weight limit and is therefore not suitable for HGV traffic. • The B3151 will not be used for works traffic south of the site. • Steart Hill will not be used for works traffic north of the site. <p>The B3151 and Steart Hill are specifically mentioned as they are adjacent to site compounds and may prove to be a particular attraction to works traffic if access is not controlled.</p> <p>Construction traffic control measures are not specifically mentioned for other local roads (such as Plowage Lane, Howell Hill and Traits Lane) as these roads are not adjacent to site compounds and have existing weight restrictions. Although this implies that the risk of mis-use of these narrow, local roads is lower than for some other local roads, the Applicant acknowledges that further detail will be required in the final traffic management plan to ensure use by construction traffic is minimised.</p> <p>It may be necessary, from time to time, for vehicles relating to the works to use these local roads, for example to inspect and maintain traffic management installations.</p>
3.0.3	The Applicant	<p>OEMP Could the Applicant please provide provisions for the Outline Traffic Management Plan so that proper consideration can be had to whether solutions</p>	<p>The Applicant would like to reiterate the point made in the Applicant's Written Submissions of Oral Case at Hearings (REP4-020) that this is a detailed design point and it is premature to provide that at this stage. The effectiveness of various possible measures in ensuring that traffic</p>

EXQ3	Question to	Question	The Applicant's Response
		proposed to mitigate the effects of self-diverting traffic would be effective.	uses formal diversion routes will be considered in due course and will be a matter to be approved under Requirement 11.
3.0.4	The Applicant	<p>OEMP In order to ensure that the special character of the Hazlegrove House RPG is protected as far as possible, could the Applicant please provide a draft Management Plan for that part of the RPG that falls within the red line boundary of the application site?</p>	<p>The impacts from the scheme on the area within the Order limits are managed through the DCO already, particularly through the inclusion of mitigation set out in Table 3.1 Register of Environmental Actions and Commitments (REAC) within the OEMP (REP5-013). During construction, proposed mitigation measures include the layout of the soil storage area at Hazlegrove House RPG to be designed in such a way to minimise the impact on views south west from the house and across the park; this will include the location of areas and functions of the compound and screening by way of suitable fencing or timber hoardings. A detailed landscaping scheme in line with the proposals included within the environmental masterplan is included within the OEMP. This will help to mitigate permanent and operational impacts. Consultation on the detailed design with Historic Buildings and Monuments Commission for England (HBMCE), South Somerset District Council (SSDC) and The Gardens Trust is also included in the OEMP. The Applicant does not agree that a Management Plan for that part of the RPG within the Order limits is required in order to ensure that the special character of the Hazlegrove House RPG is protected from the impacts of the scheme.</p>
3.0.5	The Applicant	<p>RNAS Yeovilton a) Has an assessment of the potential effects on RNAS Yeovilton been carried out? b) If so where do we find this information?</p>	<p>(a) An assessment of the potential effects on RNAS Yeovilton has been carried out in relation to bird strikes and height restrictions.</p> <p>(b) Appendix A of the draft Statement of Common Ground between the Applicant and the Defence Infrastructure Organisation (DIO) (REP4-010) details the assessment undertaken in relation to the risk of bird strikes. In summary, the assessment undertaken has suggested that the proposals are not high risk in terms of bird strikes as:</p> <ul style="list-style-type: none"> • There are limited records of problem bird species in the area. • Ponds are generally sheltered apart from pond 4, which may require some additional measures. • Adjacent road noise is likely to deter birds.

EXQ3	Question to	Question	The Applicant's Response
			<ul style="list-style-type: none"> • There will be no public access to these ponds to eliminate possible bird feeding. <p>In addition, as detailed within the draft Statement of Common Ground between the Applicant and the DIO (REP4-010) a calculation has been undertaken to determine the height restrictions adjacent to the airfield and this information has been passed on to the contractor. Generally, a height restriction of 21 metres above ground has been determined, although as noted in the Applicant's response to question 3.10.20 below, discussions are still ongoing with the DIO.</p> <p>The Applicant also notes that discussions with the DIO in relation to these matters are ongoing.</p>
3.0.6	The Applicant DIO	<p>Air Safety</p> <p>a) What evidence is there to demonstrate that the proposal has been designed to minimise adverse impacts on the operation and safety of RNAS Yeovilton and that reasonable mitigation is carried out?</p> <p>b) Is there any evidence to indicate whether the development would significantly impede or compromise the safe and effective use of defence assets or significantly limit military training?</p>	<p>(a) The Applicant refers the ExA to the answer provided to question 3.0.5.</p> <p>(b) The Applicant refers the ExA to the answer provided to question 3.0.5.</p>
3.0.7	The Applicant	<p>Scheme Objectives</p> <p>The Case for the Scheme [APP-149] sets out the scheme objectives. What evidence is there that scheme will deliver these objectives?</p>	<p>The evidence that the scheme will meet the objectives is set out in The Case for the Scheme (APP-149) shown in the Applicant's response to question 3.0.1.</p>
3.0.8	The Applicant	<p>Social and Environmental Impacts</p> <p>NPSNN 3.3 explains that the Government expects applicants to avoid and mitigate environmental and social impacts in line with the principles set out in the NPPF and the Government's planning guidance. Applicants should also provide evidence that they have considered reasonable opportunities to deliver environmental and social benefits as part of scheme.</p>	<p>The Applicant recognises the Government's expectation in NPSNN paragraph 3.3 to avoid and mitigate environmental and social impacts in line with NPPF principles and Government Planning guidance along with the detailed considerations in Chapter 5 of the NPSNN.</p> <p>The NPPF seeks to promote a strong and competitive economy with Local Plans identifying 'priority areas for economic regeneration, infrastructure provision, and environmental enhancement'.</p>

EXQ3	Question to	Question	The Applicant's Response
		<p>Where do we find evidence that the Applicant has considered such opportunities, rather than merely mitigate adverse impacts?</p>	<p>Paragraph 8 of NPPF Section 2 (Achieving Sustainable Development) sets out an economic, social and an environmental objective which cumulatively will achieve sustainable development. These objectives inform detailed NPPF policies and the applicant wishes to draw the ExA's attention to its explanation in the following paragraphs of how the business case and design process for this scheme is consistent with the principles below:</p> <p>Economic - to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure.</p> <p>Social – foster a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities, health, social and cultural well-being.</p> <p>Environmental – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land.</p> <p>In addition, section 9 of the NPPF refers to 'promoting sustainable transport' and within this section, paragraph 102 points out that transport issues should be considered from the earliest stages of development proposals so that "<i>the environmental impacts of impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigation any adverse effects</i>".</p> <p>With reference to the applicant's answer to question 3.0.1 the Applicant has, throughout the process of developing the business case and design for this scheme, adhered to social and environmental principles that relate to paragraph 3.3 of the NPSNN. Paragraph 4.5 of the NPSNN advises that schemes developed using DfT's Business Case guidance and WebTAG guidance "<i>will assess the economic, environmental and social impacts of a development...</i>" and that this</p>

EXQ3	Question to	Question	The Applicant's Response
			<p>information “...will be important for the Examining Authority and Secretary of State’s consideration of the adverse impacts and benefits of the proposed development.”</p> <p>As stated in paragraph 6.1.2, 6.1.3, 6.1.9 and Appendix 2 of the Case for the Scheme (APP-149), the proposed dualling of the A303 has been developed using the Department for Transport’s (DfT) Business Case and WebTAG guidance.</p> <p>Not only should the ExA and SoS take account of the benefits set out in this document, it should also recognise the balancing exercise that is inherent to the process set out by the NPSNN.</p> <p>Notwithstanding that, the Applicant has also provided evidence in the application documents that it has considered opportunities to deliver environmental and social benefits as part of the scheme, in line with paragraph 3.3 of the NPSNN, grounded in a robust EIA and pre-application consultation process, evidenced in the ES and consultation report (APP-023)</p> <p>The Environmental Statement details the Environmental Impact Assessment (EIA) undertaken for the proposed scheme, including any mitigation measures needed to reduce adverse effects. These mitigation measures are further documented within the OEMP (REP5-013) which is currently a live document that is being updated during the Examination. An Environmental Mitigation Route Map (REP5-021) has also been produced as a signposting document which sets out all the environmental mitigation measures included within the scheme and the details of where these are secured within the Development Consent Order documents.</p> <p>In addition to these mitigation measures, enhancement measures have been embedded within both the design and mitigation measures as part of the scheme. The scheme presents a biodiversity net gain, as detailed within Chapter 8 Biodiversity of the Environmental Statement (APP-045) and further reported within the Biodiversity Offsetting Report (REP4-017). The Environmental Masterplan (APP-107)</p>

EXQ3	Question to	Question	The Applicant's Response
			<p>presents the environmental design proposed as part of the scheme which has been designed to reflect and where possible enhance the local biodiversity, and landscape and heritage setting. Furthermore, the non-motorised user strategy proposed as part of the scheme will increase the network of footpaths and bridleways and provide better connectivity within the local area. The proposed drainage philosophy being applied is to replicate, as far as reasonably practicable, an undeveloped site response to rainfall, limiting both the rate and volume of surface water run-off. The proposals are not measured against the existing drainage performance. The highway drainage strategy will seek to capture the run-off from the highway, its associated earthworks and structures as well as existing lengths of the A303 that are to be retained and de-trunked. The run-off will undergo treatment and be attenuated before release into local watercourses. The strategy also takes into account a 40% allowance for the effects of climate change, in line with Environment Agency guidance.</p>
3.0.9	The Applicant SSDC SCC	<p>Benefits of the Scheme</p> <p>The Applicant's response [REP5-024] to the ExA's Further Written Question 2.6.4 [PD-014] suggests that the scheme would be beneficial in that it would assist with employment sites within the Local Plan to come forward.</p> <p>Are the sites referred to predicated on the implementation of this scheme, or are they allocations that would come forward in any event?</p>	<p>The Applicant submits that consideration of relationship between the scheme and employment sites must reflect the interactive nature of development (including employment development) and infrastructure as evidenced in the development plan documents referred to in the paragraphs. As stated in paragraphs 1.1.3 and 1.1.4, it is reasonable to conclude that there will be indirect employment benefits arising from improved connectivity and improved journey time savings along the A303.</p> <p>In terms of development plan employment allocations and delivery, the evidence set out below from SSDC's Local Plan demonstrates that there have been long-standing allocations of sites suitable for delivery. Combined with the Applicant's evidence in response [REP5-024] to the ExA's Further Written Question 2.6.4 (PD-014) this demonstrates why the scheme is anticipated to have a beneficial effect on bringing Local Plan employment allocations forward.</p> <p>Paragraph 2.1.9 of the Land Use and Economic Topic Paper (REP5-024) explains that the Heart of the South West of England LEP, SSDC and Somerset County Council all show support for the need for improvements to the key transport corridors in Somerset and believe</p>

EXQ3	Question to	Question	The Applicant's Response
			<p>that doing this can encourage economic growth across the key sectors of the local economy. Paragraph 2.1.10 goes on to say that the proposal corresponds with the local economic development objective of the local councils and the LEP and will help address the existing transport infrastructure capacity issues identified in the Local Plan, therefore benefitting local businesses.</p> <p>SSDC's Local Plan (2006-2028) sets out 9 goals within this Local Plan. Achieving these 9 goals will enable SSDC to achieve its vision over the plan period. Strategic objective number two sets out that "access to quality services and facilities designed around the needs of the community, enabling everyone to have fair and equitable access to what they need in their local area". The proposed development would be beneficial to South Somerset as it will alleviate congestion along the A303, whilst improving access to key employment centres.</p> <p>SSDC's Local Plan will assist the delivery of 11,250 jobs as a minimum, and 149.51 hectares of land for economic development between April 2006 and March 2028. Policy SS3 (Delivering New Employment Land) sets out that 96.54 hectares has been allocated as employment land, subsequently, creating a demand for an additional 52.97 hectares of land to be allocated to meet SSDC's target. Paragraph 2.1.4 of the Applicant's Land Use and Economic Topic Paper [REP4-024] sets out that the District Council's Employment Land Review predicts that there is an adequate supply of employment land to meet growth requirements at a District level up to 2026; however, some settlements have a shortage of suitable employment land, particularly in Yeovil, Milborne Port and South Petherton.</p> <p>The Local Plan includes 9 employment land sites (located in Yeovil, Crewkerne, Martock, Castle Cary and Wincanton), which were brought forward from South Somerset Local Plan 1991-2011. These sites continue to form part of the strategy set out in Policy SS3 and Policy EP1 (Strategic Employment Sites). Some of these sites were saved in Policy SS3 and some formed the residual element of the adopted South Somerset Local Plan (1991-2011) allocation, indicating they are long standing allocations which have been reviewed through the</p>

EXQ3	Question to	Question	The Applicant's Response
			<p>Employment Land Review and are considered to be deliverable. A few of these site allocations include consented planning permissions and currently undecided permissions being Lopen Head Nursery at South Petherton, Torbay Road at Castle Cary and Land at Lufton in Yeovil.</p> <p>Key employment centres are concentrated along the A303, including Yeovil, Wincanton, Ilminster, Crewkerne, Chard and Ilchester reflecting the significance of the strategic route in principle. Policy EP1 sets out four employment allocations that are strategically significant for local and inward investment. Three of these sites are located in Ilminster and cumulatively will deliver approximately 18.75 hectares of employment land as their location on the junction of the A303/A358 provides a strategically important opportunity to secure major investment into the district for a range of industries (including distribution).</p> <p>Preliminary research undertaken in 2015 for Highways England suggested that sites in and around Yeovil town will benefit from journey time savings to and from the A303 via the A37. Yeovil is the key location for employment growth within the District and this recognition has led it to being designated as the prime economic driver within the District.</p> <p>In addition, the A303 directly bypasses Ilchester, which is designated as a Rural Centre within the SSDC's Local Plan. As laid out in Policy SS1, Ilchester has a strong employment role due to its proximity to the Royal Navy Air Station Yeovilton, which has a major impact on the area as it employs around 2,500 people. Paragraph 8.30 of the SSDC's Local Plan states that due to "<i>proximity to the A303 and good connections to the south and north, it means that Ilchester will always enjoy the advantages brought by good road communications. There is likely to be a small local demand for employment sites and this should be supported to increase Ilchester's level of self-containment and offer an alternative to Yeovil</i>".</p> <p>Subsequently, the proposed development will address the existing transport infrastructure capacity issues and benefit local businesses in</p>

EXQ3	Question to	Question	The Applicant's Response
			<p>key centres and rural centres, which are reliant upon the A303. In addition, the proposed development will also aid SSDC in achieving its vision of Market Towns and Rural Centres “<i>providing economic regeneration, better housing, with the maintenance and enhancement of commercial and community services across the district, allowing better access for all</i>”.</p> <p>The Local Plan recognises the relationship between the A303 as a strategic route and stimulus for employment and economic growth. As discussed above, the local authority has identified numerous sites across the district to be brought forward for employment development. Some of these sites have been brought forward from the South Somerset Local Plan 1991 – 2011 because they have been reviewed and considered to be deliverable. They have also been saved from the previous Local Plan, forming part of the existing Policies (Policy SS3, Policy SS5, Policy EP1 and Policy HG1) presented in the current adopted Local Plan. This suggests these sites are long standing allocations which the Council deem to be suitable for delivery of employment development.</p> <p>The proposed scheme will improve the connections in the local area but also in the wider network, providing reliable and quicker connections to the South West and London. This scheme has the potential to be the catalyst for the delivery of these sites, along with the other allocated sites in the adopted plan. In turn, this will allow them to be brought forward for employment development quicker as the connections, journey reliability and resilience will be greatly improved.</p> <p>These sites are not predicated on the implementation of this scheme because they are long-standing development plan allocations that will come forward eventually. However, the improved connectivity and resilience the scheme will provide, will contribute to a more supportive context for employment land delivery.</p>
3.0.10	The Applicant	<p>MoD Land The Applicant was asked at ISH1 and in the ExA's Further Written Question 2.7.2 [PD-014] to provide details, including emails, as to the nature of discussions</p>	<p>The consideration of the inclusion of a parallel local road is set out in detail in the Applicant's Deadline 5 submission (REP5-025). The Applicant again notes that an immediately adjacent parallel local road is not considered a necessity for this scheme which is an all-purpose</p>

EXQ3	Question to	Question	The Applicant's Response
		<p>with the MoD in relation to the possibility of acquiring some additional land in order that a parallel road could be accommodated at Camel Hill.</p> <p>Can the Applicant please submit these documents?</p>	<p>trunk road with suitable local road connections already in place to provide necessary alternative routes. An immediately adjacent parallel local road is not demonstrated to be necessary through traffic modelling or for any other highway reason. The Applicant did consider the merits of providing one, however this highlighted challenges including the need for Ministry of Defence land managed by the Defence Infrastructure Organisation (DIO) which meant this option was not taken forward.</p> <p>The Applicant indicated in its Deadline 4 response (REP4-018) that discussions with the DIO have been ongoing since 2017. As part of those discussions, the Applicant asked about the possibility of using part of the DIO land for a parallel road. After considerable chasing, the DIO confirmed by email that in principle that they were content with the land take for a parallel road, provided that the cables and any equipment in the top soil could be protected and subject to agreement on working procedures. It is noted that it is likely that cables in the topsoil would have to be relocated not just protected in order to protect the functioning of the facility and future access for maintenance.</p> <p>The DIO response of accepting some use of DIO land was not received until three months prior to submission of the DCO application (April 2018). By that stage, design of the scheme without the parallel road had progressed and assessments of environmental impacts had been or were being undertaken. No information had been provided by the DIO with regard to the cables or equipment located in the top soil and so it was unknown whether these could be sufficiently protected or relocated.</p> <p>Given that powers of compulsory acquisition are not available for MOD land, agreement for non-essential elements would have had to be in place in good time before scheme design was finalised and assessed in order to protect deliverability of the scheme. With regard to the original main construction compound, the DIO had not raised any objection and so far as the Applicant knew was content before they advised of the intention to use that location for landing lights. This demonstrates the need for formal agreement from Crown bodies</p>

EXQ3	Question to	Question	The Applicant's Response
			<p>before the development can rely on using Crown land. To do so without formal agreement creates substantial risk to the project which cannot be mitigated through powers of compulsory acquisition as it can in other cases. Agreement in principle is accordingly not an acceptable basis for the Applicant to progress to submission. That is why despite agreement in principle on the footpath the alternative was retained in the DCO pending formal agreement.</p> <p>Nevertheless, the Applicant did undertake a high-level assessment of the possibility of including a parallel road at this location. However, it was found to be more expensive, buildability advice received stated that it would take longer to construct and high-level assessment indicated that the environmental impacts would be worse.</p> <p>The risk to the scheme of proceeding with a design to include a parallel road with no guarantee that consent would be forthcoming from the DIO was determined to be too great. Given that formal consent to the inclusion of land for a footpath (and not a bridleway, as requested) has only just been given by the DIO, and has taken over a year to obtain, it is clear that the complications around using DIO land to provide something far more substantial than a footpath would have been a lot more complex and difficult to resolve. In addition, given that the nature and extent of the services in the land are not known, the complexity of protecting and relocating these is not known.</p> <p>Any delays to the scheme's submission date as a result of the need to enter into an agreement with the DIO to secure the land, together with the further design work that would have been required to incorporate a parallel road would have meant that the Applicant would not have achieved submission of the DCO application in line with the schedule set by the DfT for the RIS 2015 – 2020. Consequently, funding for the scheme would have been put at risk. The Applicant is aware of other schemes which have missed Government targets and subsequently lost funding. Any loss of funding would have resulted in the DCO scheme not being progressed and this was not a risk that the Applicant wished to take, given the significant benefits that the scheme will deliver, particularly at a local level.</p>

EXQ3	Question to	Question	The Applicant's Response
			<p>All of the above resulted in too great a risk to the scheme's deliverability and so it was determined, prior to submission of the DCO application, not to progress consideration of the inclusion of a parallel road.</p> <p>Finally, the Applicant declines to provide the ExA with copies of correspondence containing private discussion and negotiation between parties which were not intended to be submitted into a public examination. It is not appropriate for such material to be disclosed in a public forum as it would seriously undermine Highway England's ability to properly and meaningfully negotiate with landowners.</p>
3.0.11	The Applicant	<p>NPSNN NPSNN 2.24 states that government policy is to bring forward individual schemes to tackle specific issues, including those of safety, rather than to meet unconstrained traffic growth (i.e. 'predict and provide').</p> <p>What are the specific issues this scheme seeks to tackle?</p>	<p>The scheme objectives are set out in The Case for the Scheme (APP-149). Please refer to the Applicant's response to third written question 3.0.7 for further information.</p>
3.0.12	The Applicant SCC SSDC	<p>Scheme Lighting Within the draft Statement of Common Ground between the Applicant, SCC and SSDC [REP5-017], SCC comments on the responsibility of the proposed lighting system. The Applicant states that this is a matter of detailed design.</p> <p>It is unclear why this should be a matter of detailed design. What mechanism is in place to address this detail?</p>	<p>It has been the Applicant's approach throughout this process that responsibility for lighting should be determined once the design has been prepared and agreed in line with the limits of responsibility for all of the relevant parts of the detailed design. The Applicant has attempted to consult with Somerset County Council in relation to the proposed lighting design since the outset of preparing the DCO application, but to date have not received any feedback from the County Council's lighting team. The design, and subsequent agreement regarding maintenance responsibility, will therefore now be the subject of Requirements 12 and 15 of the draft Development Consent Order (REP5-005). The details to be approved under Requirement 12 include the limits of responsibility. Requirement 15 secures the requirement for a detailed lighting design to be approved in writing by the Secretary of State following consultation with the relevant planning authority and the local highways authority.</p>
3.1	Archaeology and Cultural Heritage		

EXQ3	Question to	Question	The Applicant's Response
3.1.2	The Applicant	<p>Environmental Statement</p> <p>In the Summary Chapter of the Environmental Statement [APP-052], Table 15.1 does not provide a result for the significance of residual effect(s) after mitigation for traffic noise effects on the Hazlegrove House Group.</p> <p>Could this please be completed?</p>	<p>There would be a negligible change in traffic noise heard from the external areas of the Hazlegrove House Group in both the short-term and long-term using the noise change criteria set out in. However, given the existing situation where road noise forms part of the background ambient noise, this slight increase will not impact on the ability to understand the heritage value of the group. As such the assessment of no significant effect on the Hazlegrove House Group remains.</p>
3.1.3	The Applicant Historic England	<p>Camel Hill SAM</p> <p>In light of the additional information on the distance between the limits of deviation and the Camel Hill SAM as shown in Figure 1.1 of the Applicant's Response to the ExA's Further Written Questions [REP5-025]. Could the Applicant and Historic England please indicate the degree of harm within the analysis set out in the NPSNN to the Camel Hill SAM that they consider the proposal would create.</p>	<p>The level of harm to Camel Hill Scheduled Monument (SM) is considered less than substantial in NPSNN terms. The level of less than substantial harm would be at the lower end of the scale. This is because there is no physical intervention in Camel Hill SM, and the setting will be largely unaltered as demonstrated in the photomontage across the monument submitted at Deadline 5.</p>
3.1.5	The Applicant	<p>Hazlegrove House RPG</p> <p>On the basis of the acceptance of the Applicant's proposition as to the need for a Conservation Management Plan (CMP) as set out in its response to the ExA's Further Written Questions question 2.1.7, could the Applicant please explain where and how the CMP is to be secured in the DCO?</p>	<p>The Applicant does not agree that the response to question 2.1.7 in REP5-025 can reasonably be read as accepting the need for a Conservation Management Plan (CMP) and reiterates that it does not accept that position.</p> <p>The Applicant has been very clear that it does not accept that a CMP is required as mitigation for the DCO scheme. The impacts from the scheme on the area within the Order limits are managed through the DCO already, particularly through the inclusion of mitigation set out in Table 3.1 REAC within the OEMP (REP5-013) (further details of the proposed mitigation are included in the response to 3.0.4 above). The Applicant therefore does not agree that the CMP should be secured in the DCO.</p>
3.3	Biodiversity, Ecology and Natural Environment (including Habitat Regulations Assessment) (HRA)		
3.3.1	The Applicant	<p>Biodiversity effects</p> <p>The Applicant has referred to its Chief Highway Engineer Memorandum 422/18: "Supporting Transparency around our Biodiversity Performance" document in support of its biodiversity metric.</p>	<p>(a) A copy of this document has been included within Appendix A of this report.</p> <p>(b) The above document is based on Technical Paper: the metric for the biodiversity offsetting pilot in England (Defra 2012). There is</p>

EXQ3	Question to	Question	The Applicant's Response
		a) Could we please be provided with a copy? b) Could the differences between DEFRA's biodiversity metric and the biodiversity metric in the above document be fully explained?	no difference in how the existing and post-construction biodiversity units are calculated between the metric used in the above document and the Defra metric.
3.3.3	The Applicant SSDC Natural England	<p>Biodiversity effects Paragraph 5.33 of the NPSNN indicates that, when considering proposals, the SoS should consider whether the applicant has maximised any opportunities for building in beneficial biodiversity features as part of good design.</p> <p>Could the parties explain whether they consider that the Applicant has achieved this, giving examples from the evidence submitted how they have come to their conclusions?</p>	Ecological input into the scheme design has been provided throughout the design process in order to maximise biodiversity gains wherever possible. These have included: <ul style="list-style-type: none"> • Proposed seeding and maintenance of 'nutrient poor species rich managed grassland' in place of amenity grassland for all areas of the scheme where managed grassland is required, such as for sightlines and maintenance strips. • Considerable planting of woodland habitat resulting in a 2.71 hectares net gain of this habitat type. • The Highways England biodiversity metric (based on the Defra metric) has been applied to the scheme, which found a resultant biodiversity net gain. • A proposed wildlife area within the eastern extent of the scheme will comprise woodland; wildflower and species rich grassland; scattered trees; wet grassland and a wildlife pond, providing a matrix of habitats that will support a range of protected and notable species. • In addition to habitat planting, a range of mitigation and enhancement measures have been incorporated into the scheme design, including bird and bat boxes; barn owl nest boxes; a bat house and a badger tunnel.
3.3.4	The Applicant Natural England	<p>Bat surveys In the final SoCG between the Applicant and Natural England [REP5-015] it is stated that "landscape scale transects will not support the DCO. Therefore, they can be completed in 2018 and 2019 post submission but before construction commences."</p>	a) In accordance with Berthinussen <i>et al</i> (2015) 'Development of a cost-effective method for monitoring the effectiveness of mitigation for bats crossing linear transport infrastructure', landscape scale transects were completed in 2018 (pre-construction) to be repeated using the same methodology 5 years post construction. The aim of these surveys is to assess the effectiveness of the proposed bat mitigation.

EXQ3	Question to	Question	The Applicant's Response
		<p>a) Could the parties explain the latest situation?</p> <p>b) Could the Applicant set out how it reconciles this with paragraph 5.35 of the NPSNN which states "The Secretary of State should ensure that applicants have taken measures to ensure that species ... are protected from the adverse effects of development"?</p> <p>c) How are any post-construction surveys and any necessary mitigation to be secured?</p>	<p>b) A considerable number of bat surveys were completed for the scheme in 2017 to inform Chapter 8 Biodiversity of the Environmental Statement (APP-045). These comprised:</p> <ul style="list-style-type: none"> • Bat roost assessments of all trees within 250 metres of the scheme. • Bat roost assessments (including internal assessments where possible) of buildings offering low roosting potential within the footprint of the scheme; buildings offering moderate roosting potential within 40 metres of the scheme and buildings offering high roosting potential within 120 metres of the scheme. • Climbed inspection surveys of all trees offering moderate to high bat roosting potential within 250 metres of the scheme. • Nocturnal emergence / return surveys of the above trees and buildings. • Bat activity surveys completed monthly between April and October, each comprising 6 separate transects. • Static bat detectors were deployed at three locations per transect for 5 consecutive nights per month (April to October). • Crossing point surveys at 11 locations where bat commuting habitat would be bisected by the scheme (locations partly determined by the results of the bat activity surveys. Crossing point surveys were completed monthly between July and September. • Hibernation surveys of suitable buildings and structures up to 120 metres from the scheme. <p>The above survey effort was completed in accordance with the Bat Conservation Trust (BCT) Good Practice Guidelines and the scope of surveys was agreed with Natural England in May 2017. The survey effort is appropriate for the scale of the proposed scheme and provided a robust set of baseline data. The results of these surveys were analysed in order to obtain a clear picture of bat roosting, foraging and commuting activity within the scheme extent and surrounding land to inform necessary mitigation measures in</p>

EXQ3	Question to	Question	The Applicant's Response
			<p>order to ensure that bat species are protected from the adverse effects of development. The landscape scale bat transects are intended as a means of assessing the effectiveness of proposed mitigation measures and were not required (in addition to the above) to inform the impact assessment.</p> <p>c) Post-construction landscape scale bat transects are detailed within row B3 of Table 3.1 Register of Environmental Actions and Commitments within the OEMP (REP5-013), which is secured within the dDCO under Part 1 (3) of the Requirements. These surveys are a requirement from Natural England and a report on these surveys will be issued to them once completed. There is no obligation needed for future bat mitigation resulting from these surveys under the dDCO.</p>
3.4	Noise and Vibration		
3.4.1	The Applicant	<p>Pepperhill Cottage</p> <p>The assessment of construction noise on Pepperhill Cottage has been assessed as moderate adverse. Could the Applicant please explain what safeguards/mitigation are proposed to ensure this?</p>	<p>Pepper Hill Cottage is receptor R10 in Figure 11.3 and Table 11.23 of Chapter 11 Noise and Vibration of the Environmental Statement (APP-048) and would be subject to adverse effects due to construction noise. Temporary barriers would be used to reduce noise from the construction works as set out in paragraph 11.9.5 of Chapter 11 Noise and Vibration (APP-048).</p> <p>Further noise mitigation measures are set out in paragraphs 11.9.6 and 11.9.7 of Chapter 11 Noise and Vibration (APP-048) and are included within the OEMP (REP5-013) to be developed into a full Construction Environment Management Plan (CEMP). These mitigation measures include:</p> <ul style="list-style-type: none"> • Selection of quieter plant than was used in the assessment (that was based on worst-case assumptions). • Ensuring that silencers and mufflers are fitted and effective. • Restrictions on work times for noisy activity. • Avoiding leaving plant running unnecessarily. • Training and advice to the construction team with briefings on quiet working methods. • Good communication with residents about the planned works. • Provision of site contact number to address complaints.


EXQ3	Question to	Question	The Applicant's Response
			<ul style="list-style-type: none"> Implementation of a complaints handling procedure.
3.4.2	The Applicant SSDC	<p>Noise monitoring and Mitigation</p> <p>The ExA appreciates that the applicant's case is that the proposals will not have a significant adverse effect on the local communities in terms of noise.</p> <p>Notwithstanding this, do the parties consider that there is a need to monitor and if necessary, mitigate the noise impacts post construction?</p>	<p>The EIA regulations only require monitoring to be secured for significant adverse effects. The 2 significant adverse effects that have been identified within Chapter 11 Noise and Vibration of the Environmental Statement (APP-048) will be addressed through the provision of secondary glazing. As there are no further significant adverse effects due to operational noise, no monitoring is necessary.</p>
3.5	Landscape and Visual Effects		
3.5.1	The Applicant	<p>Artificial Lighting</p> <p>a) The accepted change [PD-012] includes a new location for the main site compound. Could the Applicant please explain on the basis the site specific location the effects of artificial lighting during the construction period in terms of its landscape and visual effects?</p> <p>b) Once these assessments have been undertaken could they please be included within the cumulative assessment of the proposal?</p>	<p>a) Paragraphs 2.5.228 to 2.5.229 of Chapter 2 The Scheme (APP-039) detail the requirements for temporary site lighting. Consideration of the overall effects of the presence of the compound in its revised location was assessed as a whole and text provided to describe the likely change in view from nearby visual receptors as well as the impact upon landscape character within the Environmental Statement Addendum (see paragraphs 5.10.1 to 5.10.7 of the Environmental Statement Addendum Main Text, OD-010) and revised visual impact schedules which are included within Appendix B of this report and will be appended to the ES Table of Errata to be submitted at Deadline 7.</p> <p>b) It is not considered that any updates are required to the cumulative effects assessment.</p>
3.5.3	The Applicant	<p>Cement bound granular material store (CBGM)</p> <p>In its response to question 2.5.7 of the ExA's Further Written Questions [REP5-025] the Applicant sets out where it considers the height of the CBGM store is assessed. However, the cited paragraphs do not set out the height of the CBGM.</p> <p>a) Could the Applicant direct us to where the overall height of the CBGM store is set out to allow for its consideration?</p>	<p>a) The anticipated height of the CBGM plant was not stated within the construction strategy section of Chapter 2 The Proposed Scheme (APP-039). It is assumed that the CBGM plant would be a maximum of 16 metres, based on typical plant available.</p> <p>b) During construction glimpsed oblique middle-distance views would be available of construction plant, care facilities, site offices, CBGM plant and machinery (assumed 16 metres in height as a worst-case) over hedgerow vegetation along field boundaries. Elements of lighting within the construction compound are likely to be visible. Small pockets of vegetation removed as part of the scheme would make a barely noticeable change in the view. Views from residential visual receptor 5 are predominantly facing north west with the</p>


EXQ3	Question to	Question	The Applicant's Response
		b) If such a height has not previously been given could the Applicant please set this out and provide a full analysis of the landscape and visual effects based on this height?	compound and associated infrastructure located in the north east. Existing mature vegetation along the boundary of visual receptor 5 would heavily screen views in the immediate foreground towards the compound from ground level, with oblique views potentially afforded from upper storey windows to the compound approximately 300 metres away. Given the distance and angle of view and the temporary nature, it is expected that there would be a Minor magnitude of impact resulting in a Slight Adverse effect. Please see Appendix B containing the residential receptors that would experience a change in view as a result of the relocation of the main site compound. These changes will be incorporated into the ES Table of Errata to be submitted as part of Deadline 7.
3.5.4	The Applicant	Landscape effects on LCA2 Hazlegrove In the draft SoCG between the Applicant and Historic England [REP5-016] there is reference to the consideration of the scale of effect on the LCA2 Hazlegrove being under discussion. Could the parties please explain fully their latest positions?	This item is still under discussion between the Applicant and Historic England. The response from both parties is subject to the outcome of the decision by the ExA in relation to the non-material change request (REP6-014) as this will influence how discussions are concluded.
3.6	Socio-Economic Effects on surrounding communities		
3.6.1	The Applicant	NMU Route ES Chapter 12, Table 12.23 [APP-049] assesses the effect of the scheme on Non-Motorised Users (NMU) routes. It states that there would be a decrease in journey lengths for NMU's using WN23/33. a) Is this correct? b) IPs say it would reduce NMU use and divide the village due to loss of direct route. What is the Applicant's comment on this matter?	a) This interpretation is not strictly correct. Table 12.23 assesses the impact of the scheme on the lengths of various journeys. Table 12.23 assesses 16 journeys, three of which currently use WN23/33 along part of their length. Two of those three journeys are assessed in Table 12.33 to increase in length as a result of the scheme. The third journey involves travel between Sparkford and Camel Hill, and this journey is decreased by 170m as a result of the scheme. The Applicant assumes that this journey is the subject of this question. The journey length decreases because the proposed NMU route around Hazlegrove Roundabout and then alongside the proposed 'Camel Hill Link' offers a more direct route than the current rights of way network. In addition to being more direct, this route is also considerably safer and more comfortable than the current provision which involves an at grade crossing of the A303 trunk road.

EXQ3	Question to	Question	The Applicant's Response
			<p>b) It is the Applicant's view that the proposals will not divide Sparkford Village. As indicated above, the proposed route between the village and Camel Hill is an improvement over existing facilities in terms of directness, safety and comfort.</p>
3.6.2	The Applicant	<p>Access to Community Facilities Where has the effect of the scheme on access to community facilities been assessed?</p>	<p>The assessment of effects of the scheme on access to community facilities has been undertaken as part of the Environmental Impact Assessment within Chapter 12 People and Communities of the Environmental Statement (APP-049). The methodology for assessing effects on community land and community facilities is set out in paragraphs 12.4.18 - 12.4.19, while the approach to assessing effects on severance are described in paragraphs 12.4.20 - 12.4.24 of Chapter 12 People and Communities (APP-049). Community facilities are identified in the Baseline section of Chapter 12 People and Communities (APP-049) (paragraphs 12.7.21 - 12.7.24). These are illustrated in Figure 12.5 Community Resources in the Local Impact Area (APP-140).</p> <p>Construction effects on community land and community facilities are set out at paragraph 12.10.10, while construction effects relating to severance are set out in paragraphs 12.10.11 - 12.10.16 and Table A.2 of Appendix 12.3 (APP-095). Operational effects on community land and community facilities are set out in paragraphs 12.10.54 - 12.10.55. Operational effects on severance are not assessed as effects on severance are considered to arise during construction (as stated in paragraph 12.4.24).</p>
3.6.3	The Applicant	<p>Driver Stress Could the Applicant explain why it considers that there would be a slight beneficial effect on driver stress on local roads?</p>	<p>Paragraphs 12.10.42 to 12.10.45 of Chapter 12 People and Communities (APP-049) identify both adverse and beneficial effects as a result of the scheme on driver stress along local roads within the 250 metre study area. This considers differences in average peak flows and speeds between the Do Minimum and Do Something scenarios in the design year (2038) in accordance with DMRB Volume 11 Section 3 Part 9. Table A.1 of Appendix 12.5 (APP-097) identifies that in the study area, there would be a slight increase in driver stress along the B3151, but that there would also be a reduction in stress along the unnamed road through Podimore and also Howell Hill. No change in driver stress is predicted along other local roads within the study area with nominal changes in average peak flows speeds. Given that a</p>

EXQ3	Question to	Question	The Applicant's Response
			greater number of local roads would see benefits in driver stress in the study area than disbenefits an overall Slight Beneficial effect is pertinent.
3.6.4	The Applicant	Anti-Social Behaviour What provision has been made to monitor incidents of crime and anti-social behaviour in the newly formed cul-de-sacs which may occur as suggested by SCC [REP5-032]?	The Applicant has no statutory duty or role in the monitoring of anti-social behaviour. The Applicant has not made any provisions to monitor incidents of crime and anti-social behaviour in the newly formed cul-de-sacs being created as part of the scheme. These areas will all form part of the local highway network, the responsibility for which will sit with Somerset County Council, as local highway authority. Furthermore, it is also the role of the Police to monitor incidents of crime and anti-social behaviour and take necessary action.
3.6.5	The Applicant	Anti-Social Behaviour The Applicant refers to the concentration of low-level criminal activity at the service station. a) What evidence is there to indicate that such behaviour occurs at present? b) Does the evidence indicate that such problems occur, or are worse at, particular times of day or year? c) What is the basis of the Applicant's belief that the risk of such activity extending to the underbridge is negligible? d) To what extent are the alterations to the local road network in the vicinity of the services station likely to alter the propensity for criminal activity in this location?	a) The police.uk website contains a crime map which is able to be searched to ascertain levels of criminal activity in any given area. The crime map shows that, during 2018, the service station area was subject to the following: <ul style="list-style-type: none"> • 9 records of "other theft" (includes theft by an employee, blackmail and making off without payment). • 3 records of shoplifting. • 2 records of anti-social behaviour (includes personal, environmental and nuisance anti-social behaviour). • 2 records of public order (includes offences which cause fear, alarm or distress). • 1 record of violence and sexual offences (includes offences against the person such as common assaults, Grievous Bodily Harm and sexual offences). • 1 record of vehicle crime (includes theft from or of a vehicle or interference with a vehicle). • 1 record of "other crime" (includes forgery, perjury and other miscellaneous crime). Throughout 2018, there were therefore a total of 19 records of criminal activity at the service station. b) The police.uk website provides a breakdown of criminal activity records by month, but not by time of day. In 2018, the records

EXQ3	Question to	Question	The Applicant's Response
			<p>indicate the following records of criminal activity at the service station in the following months:</p> <ul style="list-style-type: none"> • January: 1 record of other theft. • February: 3 records of shoplifting. • March: 2 records of anti-social behaviour and 3 records of other theft. • April: 3 records of other theft. • May: 1 record of other theft. • June: 1 record of public order. • July: no reported criminal. • August: 1 record of public order. • September: 1 record of violence and sexual offences. • October: 1 record of other theft. • November: 1 record of vehicle crime. • December: 1 record of other crime. <p>The records for 2018 would suggest that there is no particular pattern of behaviour, although the highest levels of criminal activity were reported between February – April.</p> <p>c) The majority of criminal activity reported in 2018 relates to “other theft”. This would include, for example, vehicles driving off without paying for fuel. Shoplifting is then the second most frequently occurring criminal activity (3 incidents), which again would be linked to the shops and food outlets located at the service station. All other criminal activity is limited to 1 – 2 reported incidents for the year. It is therefore reasonable to conclude that the majority of the criminal activity that occurs at the service station is linked to uses that simply are not present in the underbridge.</p> <p>d) It is the Applicant's position that the alterations to the local road network in the vicinity of the services are unlikely to alter the propensity for criminal activity in this location. As stated above, the majority of criminal activity appears to be related to the service</p>

EXQ3	Question to	Question	The Applicant's Response
			station use, and the scheme does not propose any change to this use.
3.6.6	The Applicant	Severance How does the scheme reduce severance in accordance with the scheme objectives?	Please see the Applicant's response to third written question 3.0.7.
3.6.7	The Applicant	Underbridge The Applicant's responses to the ExA's Further Written Questions 2.6.6 and 2.6.8 [PD-014] acknowledges that due to its enclosed nature the underbridge may introduce a brief reduction in comfort and attractiveness and that this will need to be addressed by way of detailed design. Can the Applicant provide an indication as to how the design could address this matter?	<p>The provision of a bridleway alongside the M1 Motorway as it passes underneath the A41 in Hertfordshire has been the subject of discussion during liaison with the South Somerset Bridleways Association (SSBA). This scheme was constructed approximately 10 years ago and involves the lateral and vertical separation of the bridleway from the motorway traffic. This is shown in the image below (courtesy of the SSBA). Although it may not be possible to achieve the same level of separation alongside the proposed Camel Hill Link, the M1 / A41 scheme is considered to be an excellent model for what could be provided.</p> 

EXQ3	Question to	Question	The Applicant's Response
			<p>It may also be possible to provide sloping abutment or wing-walls (as at the Bayford Lane underpass approximately 2.5 kilometres east of the Wincanton Interchange on the A303, see image below). This solution would be less imposing than vertical faces and would also deflect traffic noise upwards away from non-motorised users.</p>  <p>These, and other design solutions, will be explored during detail design and submitted for approval under Requirement 12 of the dDCO.</p>
3.7	Traffic and Transport		
3.7.1	The Applicant	<p>Resilience NPSNN Paragraph 4.32 states that the Secretary of State needs to be satisfied that national networks infrastructure projects are sustainable and as aesthetically sensitive, durable, adaptable and resilient as they can reasonably be.</p> <p>a) What does resilience mean in context of this scheme?</p> <p>b) What criteria will be used to assess the resilience of the scheme?</p>	<p>NPSNN paragraph 4.33 explains how an applicant should approach the statement in paragraph 4.32. This is relevant in answer to question 3.7.1 a) as explained below.</p> <p>Following on from the statement in NPSNN paragraph 4.32, that “...<i>the Secretary of State needs to be satisfied that national networks infrastructure projects are sustainable and as aesthetically sensitive, durable, adaptable and resilient as they can reasonably be,</i>” NPSNN paragraph 4.33 states: “<i>The applicant should therefore take into account as far as possible, both functionality (including fitness for purpose and sustainability) and aesthetics (including the scheme’s contribution to the quality of the area in which it would be located).</i>”</p>

EXQ3	Question to	Question	The Applicant's Response
			<p>The NPSNN therefore defines resilience as a function of design and in context of the chapter within which it sits ('Criteria for "good design" for national network infrastructure) is one of the criterion that an application should consider.</p> <p>Paragraph 4.28 goes on to state that applicants should include design as an integral consideration from the outset of the proposal as in this context 'resilience' is should be a consideration throughout the design process.</p> <p>Furthermore, paragraph 4.35 states that "<i>...the Examining Authority and Secretary of State should take into account the ultimate purpose of the infrastructure...</i>" meaning that when assessing whether the scheme meets design criteria such as resilience, the ExA and SoS should also be considered in relation to the scheme objectives that represent the ultimate purpose for the infrastructure.</p> <p>With reference to evidence cited in the answer to question 3.0.1, the ExA should take into account the fact that the objectives of this scheme have been developed through a business case and design process consistent with that set out in NPSNN in order to deliver the resilient strategic network objective set out at the start of NPSNN chapter 2 in the box headed "<i>Government's vision and strategic objectives for the national networks</i>".</p> <p>The NPSNN is also explicit in stating at paragraph 2.23 that "<i>improvements to trunk roads, in particular dualling of single carriageway strategic trunk roads ... to increase capacity and to improve performance and resilience...</i>" is a key part of its wider policy approach.</p> <p>The applicant would like to draw the ExA's attention to the Cabinet Office document 'Keeping the Country Running: Natural Hazards and Infrastructure' published October 2011. This document guides improvements to the resilience of critical infrastructure and essential services and explains that "<i>resilience is the ability of assets, networks and systems to anticipate, absorb, adapt to and/or rapidly recover from a disruptive event</i>". Paragraph 2.16 refers to how resilience can be</p>

EXQ3	Question to	Question	The Applicant's Response
			<p>achieved, stating that it is provided through good design of the network and system to ensure it has the necessary resistance, reliability and spare capacity and also by establishing good organisational resilience to provide the ability and capability to respond to a traffic incident in this case.</p> <p>As set out in the specific objectives for this project in Paragraph 4.1.3 of Document 7.1 Case for the Scheme, resilience is included in the following scheme objective to <i>"Improve journey time reliability and resilience and provide extra capacity to make it easier to manage traffic when incidents occur."</i></p> <p>The bullet paragraphs in the response to Third Written Question 3.0.1 sets out aspects in which the safety and resilience will be improved as a result of providing a modern standard dual carriageway which will deliver increased capacity and safer and more reliable journeys.</p> <p>In conclusion, the concept of 'resilience' is clearly defined in the NPSNN at the strategic network level (Chapter 2 – Government vision and strategic objectives summary box, p9) and as one aspect of design criteria (paragraphs 4.32 and 4.33).</p> <p>This scheme has secured investment through RIS 1 and the Outline Strategic Business Case set out in Appendix 2 Document 7.1 Case for the Scheme and therefore supports the strategic network resilience objectives of the NPSNN.</p> <p>The design criterion in NPSNN is reflected in the scheme objective Paragraph 4.1.3 of Document 7.1 Case for the Scheme has therefore formed an integral part of the scheme design from an early stage.</p>
3.7.2	The Applicant	<p>Resilience The Extract from Road Investment Strategy: Overview, Department for Transport, December 2014 (Appendix A of the Funding Statement) [APP-021] states that taken together the improvements to the A303 will transform the route into an Expressway to the South West.</p>	<p>The existing A303 is a single carriageway road with a poor accident record and limited resilience to incidents which cause partial or full closure of the carriageway. In addition to incidents, the A303 at this location is also known to suffer from congestion at peak times, particularly holiday periods. This is exacerbated by the existing at-grade roundabouts at Hazlegrove and Podimore which impose blocking turning movements on A303 through traffic.</p>

EXQ3	Question to	Question	The Applicant's Response
		<p>In the light of this commitment how resilient would the scheme be in the absence of a parallel road?</p>	<p>During these occurrences, congestion does result and drivers will inevitably seek alternative routes to bypass the congestion. These routes often involve local and often unsuitable roads through local communities. The villages of Queen Camel and West Camel are known to be particularly affected by these informal diversions.</p> <p>Delivery of the scheme will address many of the causes of these closures. The dualling of the A303 and removal of the at-grade roundabout at Hazlegrove will provide significant additional capacity minimising peak time congestion. The number of incidents (which often involve right turning and head on conflicts) will be reduced due to the high-quality geometry, banned right turns, limited number of junctions and continuous barrier along the central reserve. There will be greater availability of road-space on the dual carriageway for traffic to pass any incidents. Maintenance of the carriageway will also be simplified. Again there will be greater availability of road space for maintenance work to take place alongside through traffic, and maintenance activities will be planned to take place during periods of low flow.</p> <p>The new dual carriageway will be significantly more resilient than the existing A303 in terms of planned works and incident response. In addition, suitable diversion routes already exist.</p> <p>Therefore, although a continuous parallel local road would provide an alternative route when the carriageway is compromised, there should be far fewer occasions when this occurs.</p>
3.7.3	The Applicant SCC	<p>Road Safety</p> <p>a) To what extent would the scheme be likely to contribute to safety improvements at the Hazlegrove and Podimore roundabouts?</p> <p>b) Would the inclusion of a Pegasus crossing make a positive contribution to safety?</p>	<p>(a) The Scheme will provide grade separation of A303 through traffic at Hazlegrove Roundabout resulting in fewer casualties due to reduced traffic conflicts at this location. This contributes to the reduction of casualties with the Scheme reported in the ComMA report (App 151) Table 14.5. The Scheme does not include any modifications to Podimore Roundabout. However, as mentioned in REP4-018 section 1.3.3, the operation and safety of the roundabout will be monitored as part of routine operations.</p>

EXQ3	Question to	Question	The Applicant's Response
			<p>(b) The Applicant would like to reiterate its response in paragraph 2.3.8 of the Applicant's Written Statement of Oral Case at Hearings (REP4-020). For the reasons stated in that paragraph it is considered that there is not safety justification for a pegasus crossing at this location.</p>
3.7.4	The Applicant	<p>Parallel Road ES chapter 3, paragraph 5.3.5 [APP-040] explains that the parallel road option put forward by IPs was not taken forward due to the pinch point at Camel Hill and the additional cost. The PCs and other IPs suggest that the parallel road scheme would be more cost effective by comparison with the current proposal since it would not require the Steart Hill Overbridge.</p> <p>a) Is the view expressed by the Applicant in the Consultation Report [APP-023] based on the provision of a parallel road in addition to the overbridge?</p> <p>b) If so, does the Applicant agree with IPs that if a parallel road was provided in this location that the overbridge would not be necessary?</p>	<p>Proposals for an additional parallel road are not part of the proposed scheme for which the DCO application was submitted, and the Applicant is therefore not considering any proposals for a parallel road during the Examination. The Applicant considers that there is already a local parallel road that runs to the south of the existing A303 (West Camel Road) which is currently used by local traffic and will be available for use by local traffic following construction of the proposed scheme.</p>
3.7.6	The Applicant	<p>Road Safety Audit In the Statement of Common Ground between the Applicant and SCC and SSDC, SCC suggest that if the post-construction Road Safety Audit identifies any problems with the lighting strategy any remedial work should be completed prior to handover. The Applicant disagrees since this will require a change to the ES.</p> <p>a) In the absence of remedial work would the proposal fall short of the desirable safety standards and possibly have adverse safety effects on road users including NMUs?</p> <p>a) In the event that the post-construction Road Safety Audit identified further works how would these be secured?</p>	<p>The Applicant does not entirely agree that the introduction to the question expresses its position correctly. The Applicant is not ruling out changes being made in response to Road Safety Audits (RSAs) but is pointing out that it cannot commit in the DCO to undertake works under that order which do not fall within the scope of the ES and therefore the consent. For example, it is known that SCC would prefer lighting on junctions where the Applicant has assessed that there is no safety need for it and which has not been included in the Environmental Statement assessment.</p> <p>a) Scheme proposals are compliant with all technical appraisal and design standards.</p> <p>b) It is further noted that RSA3, which is the stage at which it is determined whether the road is safe to open to traffic, is</p>

EXQ3	Question to	Question	The Applicant's Response
			<p>undertaken pre-completion. RSA4 will, if required, make recommendations based on observed problems. The ultimate responsibility for addressing the identified problems raised by the RSA rests with Highways England's designer as only they will have a sufficiently broad and balanced understanding of all constraints and only they have the regulatory liability for the design. If a problem is identified for which lighting may be a possible solution, this will be considered along with other solutions which may be more appropriate given the environmental sensitivity of the location. Works required by RSA are a mandatory requirement for all trunk road highway improvement schemes in the UK in order to comply with the duty to improve road safety under the Road Traffic Act 1988. The requirements of a Road Safety Audit are contained in the Design Manual for Roads and Bridges and should not be secured through the DCO to prevent duplication.</p>
3.7.7	The Applicant SCC SSDC Parish Council's	<p>Traffic Monitoring and Mitigation The ExA appreciates that the Applicant's case is that the proposals will not have a significant adverse effect on the local road network.</p> <p>Notwithstanding this, do the parties consider that there is a need to monitor and if necessary, mitigate the traffic impacts post construction?</p>	<p>As no significant adverse effects on the local network are anticipated once the scheme is in operation, the Applicant does not consider that monitoring or mitigation measures are necessary or justified under the Infrastructure Planning (EIA) Regulations 2017 to mitigate any traffic impacts post construction.</p>
3.10	Draft Development Consent Order [REP5-005 & REP5-006]		
3.10.1	The Applicant SCC SSDC	<p>General Comment Several requirements do not have implementation clauses, for example Requirements 14 and 15. Appropriate implementation timetables need to be included to ensure mitigation is provided at the appropriate time.</p>	<p>It is the Applicant's position that implementation clauses are not required.</p> <p>Taking Requirements 14 and 15 as examples:</p> <p>Requirement 14 concerns noise mitigation for the operational phase of the scheme. That mitigation will need to be in place prior to the completion of the development. Delivery will be phased during construction in accordance with the build programme. Requirement 14 requires that noise mitigation is delivered in accordance with the approved details. As was previously set out in response to question</p>

EXQ3	Question to	Question	The Applicant's Response
			<p>1.10.42 (REP2-004), the mitigation referred to in this requirement is noise mitigation which will be included within the detailed design and constructed as part of the scheme. Elements such as bunds, barriers and road surfacing are integral parts of the scheme. Accordingly, this is already covered by the requirement to undertake the development in accordance with the approved detailed design.</p> <p>Requirement 15 is approval of a written scheme for proposed highway lighting. Highway lighting will be installed as part of construction. No separate implementation clause is therefore required.</p>
3.10.2	The Applicant SCC SSDC	<p>Article 2 Interpretation</p> <p>a) Is there a reason that Articles 2 does not include a definition of local highway authority?</p> <p>b) Do the parties agree that "local highway authority" has the same meaning as in the 1980 Act? Would that be a suitable definition?</p>	<p>Article 2 of the DCO does include a definition of "the local highway authority", which is defined to mean "Somerset County Council". It is not thought necessary to define this any further.</p> <p>Under the Highways Act 1980, "local highway authority" means a highway authority other than the Minister or a strategic highways company. Adding a definition which referred to the 1980 Act would therefore not add any further clarity and it is considered that the definition currently included is sufficiently clear.</p>
3.10.3	The Applicant SCC SSDC	<p>Article 2 Interpretation</p> <p>Do the parties agree that the definition of "non-motorised user" is required to include walkers, cyclists, horse riders and carriage drivers?</p>	<p>The Applicant does not believe that such a definition is necessary. It is clear from Part 11 of Schedule 3 of the DCO the public rights of way that are being provided as part of the scheme and which class of user they will be open to. The term "non-motorised user" is only used once in the DCO in the description of Work No. 93 and that part of Work No 93 which involves the creation of a non-motorised user route is shown on the Rights of Way and Access Plans (as route BT-BU and BR-BS on Sheet 4) (REP5-004) and described in Part 11 of Schedule 3. Including a definition of "non-motorised user" is therefore unnecessary.</p>
3.10.4	The Applicant SCC SSDC	<p>Article 2 Interpretation</p> <p>a) Is there a reason that the definition of local planning authority has been removed?</p> <p>b) Do the parties agree that "the relevant planning authority" means the local planning authority for the land and matter in question, being South Somerset District Council or Somerset County Council. Would this be a suitable definition?</p>	<p>a) The definition of "local planning authority" has been removed as that term is not used within the DCO.</p> <p>b) It is not thought to be necessary to provide a definition of "relevant planning authority" as that term is defined in the Planning Act 2008. The definition suggested by the ExA does not align with the definition in the 2008 Act and so it is not thought to be appropriate to include it.</p>

EXQ3	Question to	Question	The Applicant's Response
3.10.5	The Applicant SSCD	<p>Article 21(8)(c) Do the parties agree that if the development results in damage to a listed building so as to affect its special character as a building or special architectural or historic interest it makes sense for the contractor to notify the local planning authority so that it can consider what works are necessary to rectify the damage?</p>	<p>The Applicant notes that the DCO does not contain an article 21(8)(c). The Applicant assumes that the ExA is referring to article 21(8) more generally. If any damage is caused to a listed building as a result of the development, it will be the responsibility of the owner of the listed building to consider what works would be required to rectify the damage. Compensation for that damage will be payable by the Applicant to fund any work. It is not appropriate for the Applicant to usurp the role of the owner in these circumstances and so the Applicant does not agree that it is appropriate for the contractor to notify the local planning authority of any damage caused.</p>
3.10.6	The Applicant SCC SSCD	<p>Article 43 The Environmental Mitigation Route Map is to be referred to in Requirement 3, and the Limits of Responsibility Drawing(s) will be used in connection with Requirement 12.</p> <p>Do the parties agree that these documents should be added to the list of documents at Article 43?</p>	<p>No. The Applicant is not aware that it has proposed the inclusion of reference to the Environmental Mitigation Route Map in Requirement 3, nor is it aware that it has proposed a reference to the Limits of Responsibility Drawings in Requirement 12.</p> <p>The Environmental Mitigation Route Map is simply a signposting document for provisions set out in the Environmental Statement (ES). The Applicant is of the view that it would result in unnecessary duplication if this were included in Requirement 3 or article 43, given that the mitigation set out in the Environmental Mitigation Route Map is already secured through the ES, which is included within the documents to be certified under Article 43.</p> <p>With regard to the Limits of Responsibility Drawings, these documents do not yet exist and are to be developed and approved as part of the detailed design. They therefore cannot be certified following the making of the Order but will be approved as part of the approval of detailed design under Requirement 12. As they will not exist at the time the Order is confirmed, they should not be included in Article 43.</p>
3.10.7	The Applicant SCC SSCD	<p>Schedule 2 - Requirement 1 Interpretation The definition of "LEMP" includes mitigation measures for "Schedule 1 birds", however "Schedule 1 Birds" is not defined.</p> <p>Do the parties agree that "Schedule 1 birds" needs to be defined in the interests of clarity?</p>	<p>The approval of the LEMP is required under Requirement 3, as it must form part of the CEMP to be approved under that Requirement. It is thought that any person qualified to consider and approve the LEMP would not require any further clarification on what is meant by "Schedule 1 birds" as this is a recognised professional term. However, if the ExA is minded to include such a definition in the DCO, the Applicant would not object to this and would suggest that the term</p>

EXQ3	Question to	Question	The Applicant's Response
			could be defined to mean "those birds listed within Schedule 1 of the Wildlife and Countryside Act 1981".
3.10.8	The Applicant SCC SSDC	<p>Schedule 2 - Requirement 1 Interpretation The Applicant has accepted (response to the ExA's Further Written Question 2.1.7) the need for a Conservation Management Plan for that part of the RPG within the red line boundary.</p> <p>Do the parties agree that a definition of "Conservation Management Plan" for the Hazlegrove House Registered Park and Garden is required?</p>	<p>The Applicant does not agree that the response to question 2.1.7 in REP5-025 can reasonably be read as accepting the need for a CMP for that part of the RPG within the Order limits.</p> <p>The Applicant has been very clear that it does not accept that a CMP is required as mitigation for the DCO scheme. The impacts from the scheme on the area within the Order limits are managed through the DCO already, particularly through the inclusion of mitigation set out in the REAC within the OEMP (REP5-013) (further details of the proposed mitigation are included in the response to 3.0.4 above). The Applicant therefore objects to any inclusion of a CMP in the DCO and considers the definition proposed to be unnecessary as the defined plan is unnecessary.</p>
3.10.9	The Applicant SCC SSDC	<p>Schedule 2 - Requirement 1 Interpretation European protected species" and "priority species" are not defined in the Planning Act 2008 (as amended).</p> <p>Do the parties agree that for the purposes of Schedule 2:</p> <p>a) "European protected species" has the same meaning as in regulations 40 (European protected species of animals) and 44 (European protected species of plants) of the Conservation of Habitats and Species Regulations 2017 (as amended); and</p> <p>b) A definition for "priority species" should be provided?</p>	<p>a) The Applicant is content with the suggested definition and will incorporate this wording into Schedule 2 of the DCO and submit a revised version at Deadline 7.</p> <p>b) The Applicant is willing to provide a definition of "priority species" and suggests that this should follow the definition used in the Conservation of Habitats and Species Regulations 2017. This defines "priority species" by reference to Article 1(h) of the Habitats Directive. The Applicant will propose this change in the version of the DCO to be submitted at Deadline 7.</p>
3.10.10	The Applicant SCC SSDC	<p>Schedule 2 - Requirement 3(2)(d) Construction Environmental Management Plan Do the parties agree that this requirement should include a reference to the Environmental Mitigation Route Map in the interests of clarity?</p>	<p>The Applicant does not agree with this suggestion and objects to such an inclusion. As set out in the above response to question 3.10.6, the Environmental Mitigation Route Map is simply a signposting document for provisions set out in the Environmental Statement (ES). The Applicant is of the view that it would result in unnecessary duplication if</p>

EXQ3	Question to	Question	The Applicant's Response
			this were included in Requirement 3 or Article 43, given that the mitigation set out in the Environmental Mitigation Route Map is already secured thorough the ES, which is included within the documents to be certified under Article 43.
3.10.11	The Applicant SCC SSDC	<p>Schedule 2 - Requirement 8(3) Contaminated Land and Groundwater Do the parties agree that for the avoidance of doubt this clause should read: "In the event that contaminated land or material, including impacted groundwater..."?</p>	The Applicant does not agree with the amended wording. The change proposed would make the Requirement more restrictive by creating doubt as to whether contaminated material which is not 'land' is caught by its terms.
3.10.12	The Applicant	<p>Schedule 2 - Requirement 10 Ecology, Priority and Protected Species Should the reference to the Explanatory Note be removed?</p>	Yes, this is a formatting error which will be corrected in the next revision of the dDCO to be submitted at Deadline 7.
3.10.13	The Applicant SCC	<p>Schedule 2 – Requirement 12 The ExA understands the Applicant's position that all matters should be subject to the approval of the SoS rather than any matters being the subject to local approval.</p> <p>However, if the ExA concluded that those parts of the proposal that are to ultimately to be the responsibility of SCC pursuant to the Limits of Responsibility Drawing(s) (Article 43) should be subject to the approval of SCC, as local highway authority, with the Applicant paying the Council's reasonable costs associated with such approval, what wording would the Applicant and SCC suggest to facilitate such an arrangement?</p>	<p>As set out at answer 3.10.6 the Applicant does not agree that the limits of responsibility drawings can be included in Article 43.</p> <p>As set out in the Applicant's Deadline 5 submissions REP5-025, the Applicant does not accept that it is practical, appropriate or reasonable to divide the discharging authority role as suggested. As was explained in response to Second Written Question 2.10.2 (REP5-025), the Applicant rejects in principle the suggestion that there should be a split in the responsibilities of the discharging authority between the County Council and Secretary of State.</p> <p>The Applicant does not consider it practical, helpful or reasonable to have two discharging authorities for a DCO, especially given that the underpinnings of the DCO regime include an objective of reducing the number of consenting authorities from which a single project needs to obtain consents. The DCO regime streamlines consenting in part to help to prevent conflicts between the requirements of different authorities, not to create new ones.</p> <p>It is not practical to separate the project in the terms suggested, particularly given that the limits of responsibility drawings will be one of</p>

EXQ3	Question to	Question	The Applicant's Response
			<p>the matters to be approved. The project has been designed as a whole and changes to one section will have consequences for another. Changes cannot be made to the local highway sections without considering the impact of those on the trunk road sections and vice versa.</p> <p>The Applicant maintains the position that such a split would also in practice only cause delay in cases where SCC decisions were appealed to the SOS who could then consider them in the context of the scheme as a whole. The decision would ultimately be made at the level proposed by the Applicant but with attendant, avoidable delay.</p> <p>The Applicant maintains its position that it is not reasonable to request that it put forward drafting for proposals which it considers to be unacceptable and unworkable.</p> <p>The Applicant is not providing wording for the draft DCO given that it fundamentally objects to the workability of the proposal and that such a proposal would inevitably lead us to revisit the viability of the scheme business case.</p>
3.10.14	The Applicant SCC SSDC	<p>Schedule 2 - Requirement 12(3) Detailed Design In order to be consistent with Section 7(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended), do the parties agree that in place of "permanent change or alteration of the listed features", the following text should be substituted since this terminology is well known and understood?</p> <p><i>"permanent change or alteration in any manner which would affect its character as a building of special architectural or historic interest"</i></p>	<p>The Applicant has no objection to the amended wording and will include this in the next revision of the dDCO to be submitted at Deadline 7.</p>
3.10.15	The Applicant SCC	<p>Schedule 2 - Requirement 12(6) Detailed Design Do the parties agree that this requirement should include "and shall be electronically notified to the</p>	<p>The Applicant is willing to amend the DCO to add this notification requirement and will submit a revised version of the DCO incorporating this change at Deadline 7.</p>

EXQ3	Question to	Question	The Applicant's Response
	SSDC	Environment Agency, the local highway authority, the local planning authority, and where the works relate to the Hazlegrove House Registered Park and Garden, the Historic Buildings and Monuments Commission for England" in order to ensure that appropriate notification of amendments takes place?	
3.10.16	The Applicant	<p>Schedule 2 - Requirement 13 Surface Water Drainage</p> <p>a) Should 13(1) include the Somerset Drainage Board Consortium in those consulted?</p> <p>b) Does 13(6) need to be re-written for clarity? It may be that the punctuation needs resolving.</p>	<p>a) Requirement 13 already includes provision for consultation to be undertaken with the relevant planning authority, the lead local flood authority, the local highway authority and the Environment Agency. It is not thought necessary to also consult the Somerset Drainage Board Consortium and that body has not expressed a wish to be consulted on this Requirement, nor has it raised the lack of consultation in the Statement of Common Ground, which has now been agreed (REP5-018).</p> <p>b) The Applicant has reviewed 13(6) and will propose amended wording when the dDCO is next submitted at Deadline 7.</p>
3.10.17	The Applicant SCC SSDC	<p>Schedule 2 - Requirement 13 Surface Water Drainage</p> <p>While the dDCO limits the relevant discharge rates, it does not provide for the maintenance of the Sustainable Drainage Systems (SuDS) schemes. Therefore, it could lead to excessive water retention on the site with unassessed effects. By ensuring that the SuDS schemes are managed and maintained this avoids this issue.</p> <p>a) Therefore, is a scheme for the management including maintenance of the SuDS schemes to ensure long-term effective operation required?</p> <p>b) Should be this scheme for the approval of the Local Lead Flood Authority as this this is the statutory authority and thus would be the appropriate level for authorisation?</p>	<p>a) Under the Floods and Water Management Act the Applicant is a risk management authority and so has a duty to undertake its statutory responsibilities in an appropriate and sustainable way. This includes operating managing and maintaining drainage. Given this statutory duty, there is no necessity or justification for a requirement duplicating that.</p> <p>The Flood Risk Assessment (FRA) included in the Environmental Statement submitted with the DCO application (APP-059) assessed the risks of all form of flooding, including surface water flood risk and highway drainage, as a result of the scheme (see section 6 of the FRA). It was acknowledged in the FRA that the scheme has the potential to cause an adverse effect on flood risk as greater volumes of run-off are generated, which could be discharged rapidly to receiving watercourses.</p> <p>As set out in section 6.2 of the FRA, the proposed drainage philosophy being applied to the scheme is to replicate, as far as reasonably practicable, an un-developed site – therefore creating a betterment. A 40% allowance for climate change has been incorporated within the scheme design, which is the upper end of</p>

EXQ3	Question to	Question	The Applicant's Response
			<p>the Environment Agency's suggested allowances until the 2080s. Therefore, all effects have been assessed.</p> <p>The Environmental Statement includes a Drainage Strategy Report (APP-060) which indicates broad principles for maintenance of the drainage system forming part of the DCO scheme. The Environmental Statement is a certified document pursuant to article 43 of the DCO and so the Applicant is obliged to comply with the measures set out in this document.</p> <p>The Applicant would object to a requirement for a detailed maintenance scheme for the SuDs as any drainage assets to be maintained by the Applicant following construction of the scheme will be dealt with by Highways England's Operations department. Given that the highways drainage is a long-term feature (and is considered permanent under the ES) maintenance will be a long-term, operational responsibility which cannot be too tightly constrained. It is important that flexibility is maintained to ensure any future innovation can be accommodated or maintenance can be adjusted to meet new environmental standards as these come into force, as well as being able to comply with then current good and best practice guidance. Similarly, some drainage assets will be maintained by Somerset County Council and the Applicant does not wish to restrict the Council in terms of its standard maintenance processes.</p> <p>b) As stated above, the Applicant is of the view that such a scheme is not required. If the ExA were minded to include such a scheme within Requirement 13, it is the Applicant's position that the Secretary of State should approve this scheme, in consultation with the local lead flood authority and the Environment Agency. This aligns with all of the other DCO requirements, including the remainder of Requirement 13, whilst still ensuring that the relevant statutory bodies are fully consulted, and their views taken into account.</p>
3.10.18	The Applicant	Schedule 2 Potential New Requirement – LEMP	Requirement 3 of the DCO includes a requirement for the Applicant to provide a CEMP, which must include certain management plans, listed

EXQ3	Question to	Question	The Applicant's Response
	SCC SSDC	<p>Much of the mitigation is to be provided in accordance with the LEMP, however, limited information has been submitted to indicate the matters that should be included within the LEMP. The limited information does not appear to be specific to this scheme, but reflects the general headings within Highways England (2001) Manual of Contract Documents for Highway Works Volume 1 Specification for Highway Works: Series 3000 Landscape and Ecology.</p> <p>In order to ensure that the LEMP provides the necessary mitigation in the short term and the long term, do the parties agree that a separate requirement with the following wording is desirable?</p> <p><i>"No part of the authorised development is to commence until a LEMP, substantially in accordance with the outline LEMP, for that part has been submitted to and approved in writing by the Secretary of State, following consultation with the relevant planning authority and local highway authority to the extent that it relates to matters relevant to its function.</i></p> <p><i>The LEMP shall reflect the survey results and the biodiversity, ecological and landscape design, mitigation and enhancement measures included in the environmental statement.</i></p> <p><i>The scheme shall be implemented in accordance with the LEMP."</i></p>	<p>at Requirement 3(2)(f). One of these management plans is the Landscape and Ecological Management Plan (LEMP) (see 3(2)(f)(i)), which is defined in paragraph 1 of Schedule 2 to mean "the landscape and ecological management plan, including a reptile mitigation strategy and mitigation measures for Schedule 1 birds".</p> <p>As part of the CEMP, the LEMP must be provided prior to commencement of the authorised development and must be approved by the Secretary of State, in consultation with the Environment Agency, the relevant planning authority and the local highway authority.</p> <p>The Applicant therefore submits that the LEMP is already secured through the DCO and no further requirement is necessary.</p>
3.10.19	The Applicant SCC SSDC	<p>Schedule 2 Potential New requirement -Restoration of land used temporarily for construction</p> <p>a) The dDCO does not include any provision for the restoration of the land following the completion of construction. Do the parties agree that such a requirement is necessary?</p>	<p>a) The Applicant submits that this is already included in article 33(4) of the DCO, which states that, before giving up possession of any land of which temporary possession has been taken, the undertaker must remove all temporary works and restore the land to the reasonable satisfaction of the owners of the land (subject to certain exceptions listed in the article).</p>

EXQ3	Question to	Question	The Applicant's Response
		<p>b) If so, would the following wording make appropriate provision for restoration?</p> <p><i>“Any land within the Order limits which is used temporarily for construction of the works and not ultimately incorporated in the permanent works or approved landscaping, must be reinstated in accordance with details submitted to and approved in writing by the relevant planning authority in consultation with, where appropriate, the relevant highway authority. Such work shall be completed no later than the end of the first planting or seeding season following the opening of the scheme to traffic.”</i></p>	<p>b) As stated above, the Applicant does not believe that any additional wording is required to be added to the DCO and submits that the wording proposed by the ExA would conflict with the provisions already included at article 33(4) and so should not be incorporated in the DCO.</p>
3.10.20	The Applicant DIO	<p>Schedule 2 – Potential New requirement- Construction Equipment Height The ExA notes that the DIO and the Applicant have agreed that the height of construction equipment should be limited. This matter is not included within the dDCO.</p> <p>Could the parties please submit appropriate wording in accordance with Appendix B of the (draft) Statement of Common Ground?</p>	<p>Discussions with the DIO as part of the SOCG are currently ongoing. Wording in relation to the height of construction equipment will be included in the next iteration of the SOCG between the Applicant and the DIO.</p>
3.10.21	The Applicant	<p>Schedule 2 –Potential New Requirement Conservation Management Plan for the Hazlegrove House RPG Requirement 5 requires the landscaping scheme to be appropriately designed. However, Requirement 6 doesn't deal specifically with the longer term maintenance which would be necessary for the area within the RPG outside the normal landscaping maintenance for longer than 5 years. It is considered that the HEMP would not be sufficient for this given the specialist historic interest of the park and garden.</p> <p>Could the Applicant set out appropriate wording for a Requirement to ensure that such longer term</p>	<p>The Applicant does not accept that the HEMP is insufficient; paragraph 3.1.1 of the OEMP states that the REAC is an integral part of the OEMP and will continue to be integral to the CEMP and HEMP throughout the progression of the scheme. Row CH5 Table 3.1 Register of Environmental Actions and Commitments of the OEMP (REF) states that <i>“the landscape scheme at Hazlegrove House RPG including screening, landscape planting, erection of fences, surfacing and appearance of the balancing pond should reflect the parkland character of the RPG. This includes location of planting and species to be used. The landscaping scheme including maintenance will be prepared in consultation with SSSC, The Gardens Trust and, Historic England prior to undertaking any landscape works within the RPG”</i>. The OEMP does therefore contain specific provisions for such</p>

EXQ3	Question to	Question	The Applicant's Response
		maintenance was delivered in order to protect the specialist historic interest of the park and garden?	maintenance as measures included within the OEMP will subsequently be secured within the HEMP. The securing of principles in the HEMP is the most appropriate approach given the permanent nature of the landscaping. Trying to be too prescriptive in a permanent regime risks creating inflexibility and would restrict any future innovation, or maintenance being adjusted to meet new environmental standards as these come into force, as well as being able to comply with then current good and best practice guidance.
3.10.22	The Applicant	<p>Schedule 2 – Potential New Requirement Signage Strategy Although detail of some of the intended signs have been submitted, the dDCO does not include a signage strategy.</p> <p>Could a signage strategy be added to the dDCO please?</p>	<p>The signage strategy simply guides the signage which will be included within the details to be approved under requirement 12. It was provided for information to address queries from local businesses, not as a document which is required to be secured. The Applicant does not consider that this needs to be secured in and of itself.</p> <p>If the ExA did wish to secure it, the Applicant would suggest it is more appropriately added to Requirement 12 where the details will be approved than through creation of a new requirement.</p>
3.10.23	The Applicant	<p>Schedule 2 – Potential New Requirement – Upgrade of Higher Farm Lane The ExA understands the Applicant's position that it considers that there is no need to upgrade footpath Y30/UN (Higher Farm Lane) to a bridleway and appreciates that this is outside the red line boundary.</p> <p>However, if the ExA were to consider that the proposed diversion via the Downhead junction were to be of excessive length and such an upgrade was necessary to provide appropriate mitigation to address adverse effects, by way of a negatively worded Requirement (akin to a Grampian condition) what new Requirement would the Applicant suggest to facilitate this to ensure that the upgraded facility were in place before the existing route were closed?</p>	<p>As stated in the question, it is the Applicant's position that an upgrade to footpath Y30/UN is not required as mitigation for the DCO scheme. As the Applicant has set out in REP3-006 Topic Paper: Right of Way Y30-28 (Eastmead Lane) there is currently no RoW connection over the A303 between the southern section of Eastmead Lane and the existing local road on the other side of the A303. Therefore, the Applicant should not be expected to remedy this missing link as part of its DCO scheme. A westerly connection (as advocated by SCC, SSSDC and SSBA) has not been identified as required mitigation for the DCO scheme and does not form part of the current design.</p> <p>The Applicant would strongly object to the inclusion of a Grampian style condition to secure this upgrade. Not only is this footpath outside of the Order limits but there is no guarantee, even if the Applicant were to make an application for this upgrade, that (a) such an application would be granted; and (b) it would be dealt with in a timely manner by Somerset County Council. The latter point is of particular concern given the large backlog of applications and likely processing time of</p>

EXQ3	Question to	Question	The Applicant's Response
			<p>such applications that was indicated by the County Council at the hearings in February. The result of imposing such a Requirement would be the scheme not being delivered because the funding timescales could not be complied with resulting in funding being lost.</p> <p>The Requirement suggested would not be enforceable as it is dependent on third party consent, is not necessary to make the scheme acceptable and is not reasonable. The Applicant notes that SCC has all of the necessary powers to promote this change, it has chosen not to do so to date. The Council can, and has been able for decades to, promote an upgrade of this path, it has clearly not considered that to be necessary.</p> <p>If the ExA is of the view that the route is a diversion, the Applicant would seek that the change to the original footpath is considered as being stopped up with no reasonably convenient alternative provided. This would then need to be weighed into the planning balance by the ExA and the SoS in determining whether or not to grant the DCO.</p>
3.13	Acquisition and / or Temporary Possession and / or Rights over land		
3.13.1	The Applicant	<p>Compulsory acquisition and temporary possession: general</p> <p>With regard to the outcomes from on-going diligence, the Applicant is requested to complete the attached Objections Schedule with information about any objections to the compulsory acquisition and temporary possession proposals in the application. (See Annex A to ExQ3 below).</p>	<p>No objections in relation to compulsory acquisition have been received to date. However, the Applicant has been in discussion with the Hewlett family who expressed their concerns in relation to a footpath through their land; the Applicant has subsequently proposed to remove a footpath through their land as part of the non-material change request that was submitted on 30 April 2019 (REP6-014).</p>

Appendix A: CHE Memorandum 422/18 'Supporting Transparency around our Biodiversity Performance' document

The CHE Memorandum 422/18 'Supporting Transparency around our Biodiversity Performance' document is contained below and has been submitted in response to the Examining Authority's Third Written Question 3.3.1.

- | | | |
|---|--|--|
| 1 | MPD Cascade Coordinator
OD Cascade Coordinator | Mike Wilson
Chief Highways Engineer
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- Date: 28 March 2018

CHE MEMORANDUM 422/18 – Supporting Transparency around our Biodiversity Performance

1. SCOPE

Highways England has commitments to reduce net loss of biodiversity across the Strategic Road Network (SRN)¹²³⁴; including a commitment to develop a biodiversity metric.



Figure 1. Timeline of biodiversity net loss commitments

All maintenance, renewal or improvement projects (delivered by Operations Directorate, Major Projects Directorate, other relevant Directorates, or DBFOs) where environmental assessments and survey activities are undertaken, provide opportunities to feed into this metric by establishing the ecological baselines and biodiversity units within project footprints.

This memorandum supports consistent reporting of biodiversity units, where project teams are collecting information. This is currently an optional provision and can be used forthwith on highways and/or roads projects, including those currently being progressed or under construction, where projects are already contracted to undertake biodiversity reporting. Projects, where procurement of works has reached a stage at which the memorandum’s use would result in either significant additional expense, or delay progress can be exempt subject to the decision of the project manager (or appropriate decision maker).

For projects that are already under construction this memorandum also offers a consistent and proportionate approach, which may be adopted to report the post-project position (see Section 3).

¹ Department for Transport, 2015. Road investment strategy for the 2015 to 2020 road period.

² Highways England, 2015. Highways England Delivery Plan 2015-2020.

³ Highways England, 2016. Highways England Delivery Plan 2016 to 2017.

⁴ Highways England, 2017. Highways England Delivery Plan 2017 to 2018.

2. SUMMARY

Why now?

Reporting of biodiversity units by projects can support groundtruthing and corporate performance.

3. MAIN TEXT

We recommend that projects use the following approach for reporting of biodiversity units.

1. Report biodiversity units before works by:
 - recording the areas of habitat plots (in hectares) using standard habitat categories listed within Annex B; and
 - evaluating and reporting the condition of these habitat plots, using condition assessment stated within Annex B.
2. Report biodiversity units after works by:
 - recording the areas of habitat plots (in hectares) using standard habitat categories listed within Annex B; however
 - habitat condition will be assigned by Highways England's SES Environment Group centrally.

The calculation of biodiversity units, based on established industry practice⁵, is:

$$\text{Biodiversity Units} = \text{Distinctiveness Score} \times \text{Condition Score} \times \text{Area}$$

Where:

Distinctiveness Score - (high, medium, or low) based on broad habitat types. Further information on allocation of distinctiveness is included in Annex B.

Condition Score – (good, moderate, or poor) based on habitat condition assessment. Further information on allocation of condition is included in Annex B.

Area - hectares of habitat type.

Awareness of the memorandum will be increased using Highways England's Update Bulletin and Leadership Link. Training and embedment will be delivered through Tier 0.

4. BUSINESS IMPLICATIONS

This information will inform annual reporting in support of performance monitoring and developing of reporting in this area.

5. COSTS

The approach set out in this memorandum supports efficiency in the calculation and reporting of biodiversity units, where this work is commissioned.

This memorandum also supports reporting against Highways England's Delivery Plans KPIs^{6,7} and Highways England's License requirements⁹.

The information collected in support of this reporting is based on existing project development approaches; specifically environmental assessment and design requirements. As such, these are expected to form part of existing contractual requirements.

⁵ Defra, 2012. Biodiversity Offsetting Pilots Technical Paper: the metric for the biodiversity offsetting pilot in England.

⁶ Highways England, 2015. Highways England Delivery Plan 2015-2020.

⁷ Highways England, 2016. Highways England Delivery Plan 2016 to 2017.

⁸ Highways England, 2017. Highways England Delivery Plan 2017 to 2018.

⁹ Department for Transport 2015. Highways England: Licence.

6. IMPLEMENTATION / ACTIONS REQUIRED BY MAJOR PROJECTS AND OPERATIONS (AND OTHER DIRECTORATES)

Project Managers/ Project Sponsors (Operations Directorate, Major Projects Directorate, and other relevant Directorates) can cascade this advice to all service providers and contractors.

7. WITHDRAWAL OF DOCUMENT

It is envisaged that this CHE memo will be assimilated into an established Highways England document set such as DMRB, MCHW or the Operational Metric Manual.

8. CONTACT DETAILS

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Annexes (including)

1. Annex A - Draft letter to Operations and Major Projects Supply Chain
2. Annex B - Guidance for allocating distinctiveness and condition.

ANNEX A: DRAFT LETTER TO OPERATIONS AND MAJOR PROJECTS SUPPLY CHAIN

This document shall be implemented with immediate effect subject to the general requirements set out in GD 1.

The publication of this document has the potential to require you to modify your systems or methods of Providing the Services as a result of a change to the Employer's standards or procedures. Please review the likely impact of this instruction to establish whether a compensation event has been triggered.

Highways England's Delivery Plans¹⁰¹¹¹² and Highways England's License¹³ have, contained within them, commitments to reduce the net loss of biodiversity across the Strategic Road Network (SRN), along with commitments to develop a biodiversity metric. Metrics provide a means of enabling complex information to be summarised to inform management decisions and reporting. We appreciate your support, as part of our supply chain, in aiding the achievement of these commitments.

Highways England's SES Environment Group have developed a biodiversity baseline, for the SRN, and methodology for assessing the effects that projects have upon this baseline. To support this we recommend that project teams report their biodiversity units before works and after works. Habitat surveys are routinely performed before and after works; it is envisaged that the guidance within this CHE memo will not require further effort from surveyors.

We recommend that projects use the following approach for reporting of biodiversity units.

1. Report biodiversity units before works by:
 - recording the areas of habitat plots (in hectares) using standard categories listed within Annex B; and
 - evaluating and reporting the condition of these habitat plots, using condition assessment stated within Annex B.
2. Report biodiversity units after works by:
 - recording the areas of habitat plots (in hectares) using standard habitat categories listed within Annex B; however
 - habitat condition will be assigned by Highways England's SES Environment Group centrally.

¹⁰ Highways England, 2015. Highways England Delivery Plan 2015-2020.

¹¹ Highways England, 2016. Highways England Delivery Plan 2016 to 2017.

¹² Highways England, 2017. Highways England Delivery Plan 2017 to 2018.

¹³ Department for Transport 2015. Highways England: Licence.

The calculation of biodiversity units, based on established industry practice¹⁴ is:

$$\text{Biodiversity Units} = \text{Distinctiveness Score} \times \text{Condition Score} \times \text{Area}$$

Where:

Distinctiveness Score - (high, medium, or low) based on broad habitat types. Further information on allocation of distinctiveness is included in Annex B.

Condition Score – (good, moderate, or poor) based on habitat condition assessment. Further information on allocation of condition is included in Annex B.

Area - hectares of habitat type.

Please contact environment@highwaysengland.co.uk for further information and to submit data.

This CHE memo is to be used with immediate effect subject to any implementation instructions included in the CHE memo. The publication of this CHE memo can potentially require modification of your systems and methods of providing services as a result of a change to procedures. Please review the likely impact of this instruction to establish whether a compensation event has been triggered.

If you consider that a compensation event applies, please submit a quotation within the timeframe specified in your contract. Your quotation shall identify the forecast increase or decrease in costs and the existing costs of carrying out the relevant operation to demonstrate that the forecast defined cost of carrying out the relevant operation is increased or decreased by more than the amount specified in the contract, which shall be ignored when assessing a compensation event.

¹⁴ Defra, 2012. Biodiversity Offsetting Pilots Technical Paper: the metric for the biodiversity offsetting pilot in England.

ANNEX B: GUIDANCE FOR ALLOCATING DISTINCTIVENESS AND CONDITION

Distinctiveness	Score
High	6
Medium	4
Low	2

Number of condition criteria matched	Condition	Score
3	Good	3
2	Moderate	2
1	Poor	1
0	Poor	1

Each habitat type in Table 3 has three condition criteria; these criteria have been broadly based on the condition assessment contained within Natural England's Farm Environment Plan (FEP) Manual¹⁵. There are three possible condition assessment categories: good, moderate, and poor. These scores are allocated based on the number of criteria the surveyed habitat matches (as shown in Table 2).

Phase 1 Habitat type	FEP habitat type	Distinctiveness	Condition criteria
A1.1.1 Woodland- Broadleaved - Semi natural	T08 Native semi-natural woodland	High	<ol style="list-style-type: none"> UK native species represent $\geq 90\%$ (estimated) of the habitat (vegetation cover); AND Vegetation of diverse maturity, >1 age class. Vegetation free from physical damage associated with stock or wild animals (estimated in the last five years) across $\geq 90\%$ (estimated) of the habitat. Examples can include: damage from mammals (browsing/ ringbarking), also droughting, or wind damage. $\geq 90\%$ (estimated) of vegetation free from physical damage associated with human activity (excluding habitat management interventions e.g. thinning/ coppicing). Examples of physical damage associated with human activity can include: machinery storage, signage, soil compaction, littering, burning, or other damaging management activities.
A1.1.2 Woodland- Broadleaved - Plantation			
A1.3.1 Woodland - Mixed - Semi natural			

¹⁵ Natural England, 2010. Higher Level Stewardship, Farm Environment Plan (FEP) Manual.
CHE Memo 422/18

Table 3. Assigning Distinctiveness and Condition Scores			
Phase 1 Habitat type	FEP habitat type	Distinctiveness	Condition criteria
A1.2.1 Woodland - Coniferous - Semi natural	T06* Plantations on woodlands site	A1.2.2 on an ancient woodland site, and A1.2.1 Woodland - Coniferous - Semi natural:	1. >1 ancient woodland ground flora indicator species present; AND Vegetation of diverse maturity, >1 age class. Ancient woodland ground flora indicator species: Barren Strawberry, Bluebell, Common Cow-wheat, Dog's Mercury, Early Dog-violet, Herb-paris, Pignut, Primrose, Ramsons, Sanicle, Sweet Woodruff, Tutsan, Wood Anemone, Wood-sorrel, Wood Speedwell, Wood Spurge, and Yellow Pimpernel.
A1.2.2 Woodland - Coniferous - Plantation		High A1.2.2 not on an ancient woodland site: Low	2. Vegetation free from physical damage associated with stock or wild animals (estimated in the last five years) across ≥90% (estimated) of the habitat. Examples can include: damage from mammals (browsing/ ringbarking), also droughting, or wind damage. 3. ≥90% (estimated) of vegetation free from physical damage associated with human activity (excluding habitat management interventions e.g. thinning/ coppicing). Examples of physical damage associated with human activity can include: machinery storage, signage, soil compaction, littering, burning, or other damaging management activities.
A1.3.2 Woodland - Mixed - Plantation	T06 Mixed woodland	Medium	1. UK native species represent ≥90% (estimated) of the habitat (vegetation cover); AND Vegetation of diverse maturity, >1 age class. 2. Vegetation free from physical damage associated with stock or wild animals (estimated in the last five years) across ≥90% (estimated) of the habitat. Examples can include: damage from mammals (browsing/ ringbarking), also droughting, or wind damage. 3. ≥90% (estimated) of vegetation free from physical damage associated with human activity (excluding habitat management interventions e.g. thinning/ coppicing). Examples of physical damage associated with human activity can include: machinery storage, signage, soil compaction, littering, burning, or other damaging management activities.

Table 3. Assigning Distinctiveness and Condition Scores			
Phase 1 Habitat type	FEP habitat type	Distinctiveness	Condition criteria
A3.1 Parkland and scattered trees - Broadleaved	T03 Wood pasture and parkland	A3.1 Parkland and scattered trees - Broadleaved, or	<ol style="list-style-type: none"> UK native species represent $\geq 90\%$ (estimated) of the habitat (vegetation cover); AND Vegetation of diverse maturity, >1 age class. The balance between the trees, scrub and grassland should be typical of wood pasture in the local area: AND Cover of bare ground (including localised areas, for example, rabbit warrens) $<10\%$ (estimated); AND Vegetation free from physical damage associated with stock or wild animals (estimated in the last five years) across $\geq 90\%$ (estimated) of the habitat. Examples can include: damage from mammals (browsing/ ringbarking), also droughting, or wind damage. $\geq 90\%$ (estimated) of vegetation free from physical damage associated with human activity (excluding habitat management interventions e.g. cutting). Examples of physical damage associated with human activity can include: machinery storage, signage, soil compaction, littering, burning, or other damaging management activities.
A3.2 Parkland and scattered trees - Coniferous		A3.3 Parkland and scattered trees - Mixed: High	
A3.3 Parkland and scattered trees - Mixed		A3.2 Parkland and scattered trees - Coniferous: Medium	

Table 3. Assigning Distinctiveness and Condition Scores			
Phase 1 Habitat type	FEP habitat type	Distinctiveness	Condition criteria
B1.1 Acid grassland - Unimproved	G05 Lowland dry acid grassland	High	<ol style="list-style-type: none"> 1. ≥4 Indicator species present; OR If 3 indicators present must be present throughout the habitat. Indicator species¹⁶: Bell Heather, Betony, Bilberry, Bird's-foot Trefoil, Biting Stonecrop, Bitter-vetch, Blue Fleabane, Buck's-horn Plantain, Common Centaury, Common Rockrose, Common Stork's-bill, Devil's-bit Scabious, Harebell, Heath Bedstraw, Heath Speedwell, Heather, Lady's Bedstraw, Lesser Hawkbit, Lichens, Lousewort, Maiden Pink, Milkworts, Mouse-ear-hawkweed, Parsley Pierts, Pignut, Purple Milk-vetch, Rough Hawkbit, Saw-wort, Sheep's-bit, Sheep's Sorrel, Shepherd's-cress, Thymes, Tormentil, Violets, Wild Strawberry, Wood Anemone, and Wood Sage. 2. Cover of coarse grass species (e.g. Yorkshire-fog and Cock's- foot) <20% (estimated); AND Cover of Bracken <20% (estimated); AND Cover of scrub and bramble <5% (estimated); AND Cover of bare ground (including localised areas, for example, rabbit warrens) <10% (estimated); AND Cover of indicator species of poor condition <5% (estimated). Indicator species of poor condition: Creeping Thistle, Spear Thistle, Curled Dock, Broad-leaved Dock, Common Ragwort, Common Nettle, Rosebay Willowherb, Marsh Thistle, Musk Thistle, and Greater Plantain. 3. ≥90% (estimated) of vegetation free from physical damage associated with human activity (excluding habitat management interventions e.g. cutting). Examples of physical damage associated with human activity can include: machinery storage, signage, soil compaction, littering, burning, or other damaging management activities.

¹⁶ Sites that are mosaics or transitional between two or more BAP grassland habitats may not meet the quality thresholds for any one habitat, but indicators of the different habitat types should be used interchangeably and a judgement made as to which BAP habitat best describes the site.

Table 3. Assigning Distinctiveness and Condition Scores			
Phase 1 Habitat type	FEP habitat type	Distinctiveness	Condition criteria
B1.2 Acid grassland - Semi- improved	G02 Semi- improved grassland	Medium	1. Species typical of the habitat represent ≥50% (estimated) of the habitat (vegetation cover); AND ≥4 indicator species present; OR If 3 indicators present must be present throughout the habitat. Typical species: Cock's-foot, Common Bent, Creeping Bent, Crested Dog's-tail, False Oat-grass, Meadow Fescue, Meadow Foxtail, Red Fescue, Sweet Vernal-grass, Timothy, Tufted Hair-grass and Yorkshire-fog.
B2.2 Neutral grassland - Semi- improved			Indicator species: Autumn Hawkbit, Black Medick, Cuckooflower, Bulbous Buttercup, Common Cat's-ear, Common Sorrel, Field Wood-rush, Germander Speedwell, Lesser Trefoil, Ribwort Plantain, Meadow Buttercup, Red Clover, Selfheal, and Yarrow.
B3.2 Calcareous grassland - Semi- improved			2. Cover of rye-grass <25% (estimated); AND Cover of invasive trees and shrubs <10% (estimated); AND Cover of bare ground (including localised areas, for example, rabbit warrens) <10% (estimated).
B6 Poor Semi- improved grassland			3. ≥90% (estimated) of vegetation free from physical damage associated with human activity (excluding habitat management interventions e.g. cutting). Examples of physical damage associated with human activity can include: machinery storage, signage, soil compaction, littering, burning, or other damaging management activities.

Table 3. Assigning Distinctiveness and Condition Scores			
Phase 1 Habitat type	FEP habitat type	Distinctiveness	Condition criteria
B2.1 Neutral grassland - Unimproved	G06 Lowland meadows	High	<ol style="list-style-type: none"> 1. Cover of wildflowers and Sedges throughout the sward (excluding the undesirable species listed and Creeping Buttercup and White Clover) >20% (estimated); AND ≥4 indicator species present; OR If 3 indicators present must be present throughout the habitat. Indicator species¹⁷: Agrimony, Autumn Hawkbit, Betony, Bird's-foot Trefoil, Bittervetch, Black Knapweed, Bugle, Burnet Saxifrage, Common Bistort, Common Meadow-rue, Cowslip, Devil's-bit Scabious, Dropwort, Dyer's Greenweed, Eyebright, Fen Bedstraw Field Scabious, Goat's-beard, Great Burnet, Greater Bird's-foot-trefoil, Lady's Bedstraw, Lady's-mantles, Marsh-bedstraw, Marsh Marigold, Marsh Valerian, Meadow Vetchling, Meadowsweet, Milkworts, Narrow-leaved Water-dropwort, Orchids, Oxeye Daisy, Pepper Saxifrage, Pignut, Ragged Robin, Rough Hawkbit, Salad Burnet, Saw-wort, Sneezewort, Tormentil, Water Avens, Water Mint, Wood Anemone, Yellow Rattle, and small blue/green Sedges (glaucous, common, carnation) 2. Cover of invasive trees and shrubs <5% (estimated); AND Cover of indicators of water logging (e.g. large Sedges, Rushes, or Reeds) <30% (estimated); AND Cover of bare ground (including localised areas, for example, rabbit warrens) <10% (estimated); AND Cover of indicator species of poor condition <5% (estimated). Indicator species of poor condition: Creeping Thistle, Spear Thistle, Curled Dock, Broad-leaved Dock, Common Ragwort, Common Nettle, Marsh Ragwort, Cow Parsley, and Bracken. 3. ≥90% (estimated) of vegetation free from physical damage associated with human activity (excluding habitat management interventions e.g. cutting). Examples of physical damage associated with human activity can include: machinery storage, signage, soil compaction, littering, burning, or other damaging management activities.

¹⁷ Sites that are mosaics or transitional between two or more BAP grassland habitats may not meet the quality thresholds for any one habitat, but indicators of the different habitat types should be used interchangeably and a judgement made as to which BAP habitat best describes the site.

Table 3. Assigning Distinctiveness and Condition Scores			
Phase 1 Habitat type	FEP habitat type	Distinctiveness	Condition criteria
B3.1 Calcareous grassland - Unimproved	G04 Lowland calcareous grassland	High	<p>1. Cover of wildflowers and sedges throughout the sward (excluding the indicator species of poor condition listed, Creeping Buttercup, and White Clover) >30% (estimated); AND ≥5 Indicator species present; OR If 4 indicators present must be present throughout the habitat.</p> <p>Indicator species¹⁸: Betony, Bird's-foot-trefoil, Bloody Crane's-bill, Carline Thistle, Clustered Bellflower, Common Rock-rose, Cowslip, Dropworts, Devil's-bit Scabious, Eyebright, Fairy Flax, Field Scabious, Gentians, Greater Knapweed, Hairy Violet, Harebell, Hoary Plantain, Hoary Rock-rose, Horseshoe Vetch, Kidney Vetch, Lady's Bedstraw, Lesser Hawkbit Marjoram, Milkworts, Mouse-ear-hawkweed, Orchids, Oxeye Daisy, Purple Milk-vetch, Rest Harrow, Rough Hawkbit, Salad Burnet, Saw-wort, Small Scabious, Squinancywort, Stemless Thistle, Thyme-leaved Sandwort, Wild Basil, Wild Thyme, Yellowwort.</p> <p>2. Cover of invasive trees and shrubs <5% (estimated); AND Cover of bare ground (including localised areas, for example, rabbit warrens) <10% (estimated); AND Cover of indicator species of poor condition <5% (estimated). Indicator species of poor condition: Creeping Thistle, Spear Thistle, Curled Dock, Broad-leaved Dock, Common Ragwort, or Common Nettle.</p> <p>3. ≥90% (estimated) of vegetation free from physical damage associated with human activity (excluding habitat management interventions e.g. cutting). Examples of physical damage associated with human activity can include: machinery storage, signage, soil compaction, littering, burning, or other damaging management activities.</p>

¹⁸ Sites that are mosaics or transitional between two or more BAP grassland habitats may not meet the quality thresholds for any one habitat, but indicators of the different habitat types should be used interchangeably and a judgement made as to which BAP habitat best describes the site.

Table 3. Assigning Distinctiveness and Condition Scores			
Phase 1 Habitat type	FEP habitat type	Distinctiveness	Condition criteria
B4 Improved grassland J1 Cultivated/ disturbed land	No FEP Habitat	Low	<ol style="list-style-type: none"> Species typical of semi-improved grassland habitat represent $\geq 50\%$ (estimated) of the habitat (vegetation cover); AND ≥ 3 indicator species present; OR If 2 indicators present must be present throughout the habitat. Typical species: Cock's-foot, Common Bent, Creeping Bent, Crested Dog's-tail, False Oat-grass, Meadow Fescue, Meadow Foxtail, Red Fescue, Sweet Vernal-grass, Timothy, Tufted Hair-grass and Yorkshire-fog. Indicator species: Autumn Hawkbit, Black Medick, Cuckooflower, Bulbous Buttercup, Common Cat's-ear, Common Sorrel, Field Wood-rush, Germander Speedwell, Lesser Trefoil, Ribwort Plantain, Meadow Buttercup, Red Clover, Selfheal, and Yarrow. Cover of rye-grass $< 50\%$ (estimated); AND Cover of invasive trees and shrubs $< 10\%$ (estimated); AND Cover of bare ground (including localised areas, for example, rabbit warrens) $< 10\%$ (estimated). $\geq 90\%$ (estimated) of vegetation free from physical damage associated with human activity (excluding habitat management interventions e.g. cutting). Examples of physical damage associated with human activity can include: machinery storage, signage, soil compaction, littering, burning, or other damaging management activities.

Table 3. Assigning Distinctiveness and Condition Scores			
Phase 1 Habitat type	FEP habitat type	Distinctiveness	Condition criteria
B5 Marsh/ marshy grassland	GO7 Purple Moorgrass and Rush pasture	High	<p>1. ≥4 indicator species present; OR If 3 indicators present must be present throughout the habitat.</p> <p>Indicator species¹⁹: Bog Asphodel, Sphagnum, Bog Pimpernel, Bugle, Common Valerian, Cross-leaved Heath, Devil’s-bit Scabious, Fen Bedstraw, Globeflower, Greater Burnet, Greater Bird’s-foot-trefoil, Hemp Agrimony, jointed Rushes, Lesser Spearwort, Lesser Water-parsnip, Lousewort, Marsh Bedstraw, Marsh Cinquefoil, Marsh Hawk’s-beard, Marsh Marigold, Marsh Pennywort, Marsh Valerian, Marsh Violet, Meadow Rue, Meadow Thistle, Meadowsweet, Orchids, Ragged Robin, Rough Hawkbit, Saw-wort, Sneezewort, Tormentil, Water Avens, Water Mint, Whorled Caraway, Wild Angelica, small blue/green Sedges (glaucous, common, carnation)</p> <p>2. Cover of large sedge species <30% (estimated); AND Cover of large grasses such as Tufted Hair-grass and Reeds, <20% (estimated); AND Cover of invasive trees and shrubs <5% (estimated); AND Cover of non-jointed Rushes (soft, hard and compact) <50% (estimated); AND Cover of bare ground (including localised areas, for example, rabbit warrens) <10% (estimated); AND Cover of indicator species of poor condition <10% (estimated).</p> <p>Indicator species of poor condition: Creeping Thistle, Spear Thistle, Curled Dock, Broad-leaved Dock, Common Ragwort, Common Nettle, Cow Parsley, Marsh Thistle and Marsh Ragwort</p> <p>3. ≥90% (estimated) of vegetation free from physical damage associated with human activity (excluding habitat management interventions e.g. managed burning, or cutting). Examples of physical damage associated with human activity can include: machinery storage, signage, soil compaction, littering, unmanaged burning, or other damaging management activities.</p>

¹⁹ Sites that are mosaics or transitional between two or more BAP grassland habitats may not meet the quality thresholds for any one habitat, but indicators of the different habitat types should be used interchangeably and a judgement made as to which BAP habitat best describes the site.

Table 3. Assigning Distinctiveness and Condition Scores			
Phase 1 Habitat type	FEP habitat type	Distinctiveness	Condition criteria
A2.1 Scrub - Dense/ continuous	V05 Scrub of high environmental value	Medium	<ol style="list-style-type: none"> 1. ≥3 woody species present; BUT No one woody species (with the exception of Common Juniper, Sea Buckthorn or Box) representing >75% (estimated) of the habitat 2. Vegetation of diverse maturity, >1 age class; AND Clearings and glades present; AND The scrub has a well-developed edge with ungrazed tall herbs. 3. ≥90% (estimated) of vegetation free from physical damage associated with human activity (excluding habitat management interventions e.g. cutting). Examples of physical damage associated with human activity can include: machinery storage, signage, soil compaction, littering, burning, or other damaging management activities.
A2.2 Scrub- Scattered ²⁰			
C1.1 Bracken – Continuous	V05* Bracken of high environmental value	If matches criteria in FEP ²¹ :	<ol style="list-style-type: none"> 1. Bracken forms mosaic with other habitat types; OR There is a network of paths or other openings in the Bracken canopy, providing germination sites for flowering plants 2. <15 cm depth of dead Bracken litter or standing trash beneath the Bracken canopy. 3. ≥90% (estimated) of vegetation free from physical damage associated with human activity (excluding habitat management interventions e.g. cutting). Examples of physical damage associated with human activity can include: machinery storage, signage, soil compaction, littering, burning, or other damaging management activities.
C1.2 Bracken - Scattered		If does not meet the criteria: Low	

²⁰ If scrub is occurring (or encroaching) on over habitat types (e.g. grasslands) then the habitat should be recorded and assessed as the original habitat type (e.g. grasslands).

²¹ Guidance on identifying high environmental value bracken is provided within the Farm Environment Plan 'V05* – Bracken of high environmental value' and includes: sheltered, south-facing bracken stands, below 300 m; is recorded as one of the interest features in a Site of Special Scientific Interest (SSSI) designation; or bracken where any UK BAP butterfly species, any animal species protected under the Wildlife and Countryside Act, or any Red Data Book species have been recorded.

Table 3. Assigning Distinctiveness and Condition Scores			
Phase 1 Habitat type	FEP habitat type	Distinctiveness	Condition criteria
D1 Dry dwarf shrub heath (in lowlands)	M03 Lowland heath	High	1. Cover of dwarf shrubs 25%-95% (estimated) (with ≥ 2 dwarf shrub species); AND Vegetation of diverse maturity, >1 age class with cover of young (pioneer stage) Heather and cover of old (late-mature/degenerate stages).
D2 Wet dwarf shrub heath (in lowlands)			2. Cover of trees and/or scrub <15% (estimated); AND Cover of indicator species of poor condition <10% (estimated). Indicator species of poor condition: Bracken, injurious weeds, and invasive non-native plants.
			3. $\geq 90\%$ (estimated) of vegetation free from physical damage associated with human activity (excluding habitat management interventions e.g. cutting). Examples of physical damage associated with human activity can include: machinery storage, signage, soil compaction, littering, burning, or other damaging management activities.
D1 Dry dwarf shrub heath (in uplands)	M04 Upland heath	High	1. For dry heath cover of dwarf shrubs $\geq 50\%$ (estimated), OR For wet heath cover of dwarf shrubs 20%-75% (estimated) (with ≥ 2 dwarf shrub species); AND For both wet and dry heath vegetation of diverse maturity, >1 age class with cover of young (pioneer stage) heather and cover of old (late-mature/degenerate stages).
D2 Wet dwarf shrub heath (in uplands)			2. Cover of trees and/or scrub <15% (estimated); AND Cover of indicator species of poor condition <10% (estimated). Indicator species of poor condition: Bracken, injurious weeds, and invasive non-native plants.
			3. $\geq 90\%$ (estimated) of vegetation free from physical damage associated with human activity (excluding habitat management interventions e.g. cutting). Examples of physical damage associated with human activity can include: machinery storage, signage, soil compaction, littering, burning, or other damaging management activities.

Table 3. Assigning Distinctiveness and Condition Scores			
Phase 1 Habitat type	FEP habitat type	Distinctiveness	Condition criteria
E1.6.1 Bog - Blanket bog	M06 Blanket bog	High	<ol style="list-style-type: none"> 1. Species typical of the habitat represent $\geq 90\%$ (estimated) of the habitat (vegetation cover) with $< 10\%$ (estimated) damaged e.g. dead/ bleached or crushed/ broken/ pulled); OR Cover of dwarf shrubs (at least two species) 20%-75% (estimated). Typical species: Sphagnum, Cottongrasses with a mix of Deergrass, Purple Moor-grass, and dwarf shrubs. 2. Cover of grasses, sedges, and rushes $< 75\%$ (estimated). 3. $\geq 90\%$ (estimated) of vegetation free from physical damage associated with human activity (excluding habitat management interventions such as drain blocking). Examples of physical damage associated with human activity can include: machinery storage, signage, soil compaction, littering, burning, artificial drainage designed to dry out the bog, or other damaging management activities.
E1.6.2 Bog - Raised bog	W05 Lowland raised bog	High	<ol style="list-style-type: none"> 1. Cover of sphagnum 30-60% (estimated); AND Heather and cottongrasses should be present 2. Cover of scrub should be $< 10\%$ (estimated); AND Cover of undesirable species should be $< 5\%$ (estimated). Undesirable species include: Docks, Thistles, and Ragworts 3. $\geq 90\%$ (estimated) of vegetation free from physical damage associated with human activity. Examples of physical damage associated with human activity can include: machinery storage, signage, soil compaction, littering, burning, artificial drainage designed to dry out the bog, or other damaging management activities.

Table 3. Assigning Distinctiveness and Condition Scores			
Phase 1 Habitat type	FEP habitat type	Distinctiveness	Condition criteria
E2 Flush and Spring E3 Fen	W04 Fens	High	<ol style="list-style-type: none"> 1. Surface water present or the ground being wet enough for a 6-inch nail to be easily pushed in throughout the year. 2. Cover of scrub <10% (estimated); AND Cover of bare ground <10% (estimated); AND <25% (estimated) of the fen area has a continuous cover of litter (i.e. dead vegetation); AND Cover of indicator species of poor condition <10% (estimated). Indicator species of poor condition: Common Nettle, Docks, Creeping/ Spear Thistles, Common Ragwort, and Indian (Himalayan) Balsam. 3. ≥90% (estimated) of vegetation free from physical damage associated with human activity (excluding habitat management interventions e.g. cutting, or grazing). Examples of physical damage associated with human activity can include: machinery storage, signage, soil compaction, littering, burning, artificial drainage designed to lower the water level of the fen, or other damaging management activities.
F1 Swamp ²²	W08 Reedbeds	High	<ol style="list-style-type: none"> 1. The vegetation consists of ≥60% (estimated) reeds; AND Surface water is present over at least part of the reedbed for most of the year. 2. Cover of scrub within the reedbed <10% (estimated); AND Cover of indicator species of poor condition <10% (estimated). Indicator species of poor condition: Common Nettle, Docks, Creeping/ Spear Thistles, Common Ragwort, and Indian (Himalayan) Balsam 3. ≥90% (estimated) of vegetation free from physical damage associated with human activity (excluding habitat management interventions e.g. cutting, or grazing). Examples of physical damage associated with human activity can include: machinery storage, signage, littering, burning, artificial drainage designed to lower the water level of the reedbed, or other damaging management activities.

²² Surveyor discretion should be used to determine whether a Phase 1 F1 habitat translates to the FEP habitats of F02, or W08.
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Table 3. Assigning Distinctiveness and Condition Scores			
Phase 1 Habitat type	FEP habitat type	Distinctiveness	Condition criteria
G1 Standing water ²³	W03 Eutrophic standing waters W06 Mesotrophic lakes	W06 Mesotrophic lakes, or W03 UKBAP (naturally occurring) Eutrophic Standing Waters: High W03 Water bodies heavily enriched as a result of human activity: Low	<ol style="list-style-type: none"> 1. Marginal fringe of emergent vegetation is present; AND Range of submerged and floating leaved plants is present; AND Clear water is dominated by plants (and the water is not turbid or green). 2. No evidence of damaging non-native plant or animal species. Damaging plants include: Water Fern, Australian Swamp stonecrop, Parrot's Feather, Floating Pennywort, and Japanese Knotweed (on the bank). Damaging animals include: non- native crayfish, reptiles and amphibians. 3. ≥90% (estimated) of vegetation free from physical damage associated with human activity. Examples can include: machinery storage, signage, littering, artificial drainage designed to lower the water level, or other damaging management activities.
G1 Standing water ²⁴	W07 Ponds	High	<ol style="list-style-type: none"> 1. The pond should experience only natural fluctuations in water levels; AND The pond is set within a semi-natural habitat and <500 m of another wetland feature (such as a pond, river or fen). 2. There should be an absence of damaging non-native plant or animal species; AND Not stocked with fish or supporting damaging numbers of wildfowl. Damaging plants include: Water fern, Australian Swamp stonecrop, Parrot's Feather, Floating Pennywort, and Japanese Knotweed (on the bank). Damaging animals include: non-native crayfish, non-native reptiles and non-native amphibians. 3. ≥90% (estimated) of vegetation free from physical damage associated with human activity. Examples can include: machinery storage, signage, littering, artificial drainage designed to lower the water level of the pond, or other damaging management activities.

²³ Surveyor discretion should be used to determine whether a Phase 1 G1 habitat translates to the FEP habitats of F02, W03, W06, or W07.

²⁴ Surveyor discretion should be used to determine whether a Phase 1 G1 habitat translates to the FEP habitats of F02, W03, W06, or W07.

Table 3. Assigning Distinctiveness and Condition Scores			
Phase 1 Habitat type	FEP habitat type	Distinctiveness	Condition criteria
F1 Swamp ²⁵ G1 Standing water ²⁶	F02 High environmental value boundaries (for wet ditches)	High	<ol style="list-style-type: none"> 1. Water level is ≥ 30 cm throughout the year; AND $>25\%$ (estimated) has a gently sloping profile or berms and shelves. 2. $<75\%$ (estimated) of the vegetation cover is Common Duckweed, Fennel Pondweed, and Yellow Water-lily; AND $<10\%$ (estimated) of the vegetation cover is New Zealand Pygmyweed, Floating Pennywort, Waterfern, and Parrot's Feather; AND $<30\%$ (estimated) cover of macro-algae in the summer; AND $<20\%$ (estimated) of the ditch is in heavy shade (unless the ditch is adjacent to a hedge or within a woodland). 3. $\geq 90\%$ (estimated) of vegetation free from physical damage associated with human activity. Examples can include: machinery storage, signage, littering, artificial drainage designed to lower the water level of the ditch, or other damaging management activities.
I1 Natural exposures	M07 Upland cliffs and screes	High	<ol style="list-style-type: none"> 1. Cover of Bracken, scrub and trees $<25\%$ (estimated); AND Cover of undesirable species represent $<1\%$ (estimated) of the habitat (vegetation cover). Undesirable species include: Creeping and Spear Thistles, Docks, Brambles, Common Ragwort and Common Nettle. 2. $<50\%$ (estimated) of live leaves (broad-leaved plants), fronds (Ferns) or shoots (dwarf shrubs) show signs of grazing or browsing; AND Cover of disturbed bare ground $<10\%$ (estimated); 3. $\geq 90\%$ (estimated) of vegetation free from physical damage associated with human activity. Examples can include: machinery storage, signage, littering, or other damaging management activities.

²⁵ Surveyor discretion should be used to determine whether a Phase 1 F1 habitat translates to the FEP habitats of F02, or W08.

²⁶ Surveyor discretion should be used to determine whether a Phase 1 G1 habitat translates to the FEP habitats of F02, W03, W06, or W07.

Table 3. Assigning Distinctiveness and Condition Scores			
Phase 1 Habitat type	FEP habitat type	Distinctiveness	Condition criteria
J2.1 Boundaries - Hedges - Intact	F02 High environmental value boundary	High	No condition assessment is required for hedgerows that have been planted, laid or coppiced within the last five years.
J2.2 Boundaries - Hedges - Defunct			1. ≥4 UK native woody species in a 30m section within 2m of the hedgerow UK native woody species: Alder, Alder Buckthorn, Apple, Crab, Ash, Aspen, Beech, Bird Cherry, Black-poplar, Blackthorn, Box, Broom, Buckthorn, Butcher's-broom, Common juniper, Dogwood, Downy birch, Downy Currant, Elder, Elm, Field Maple, Gooseberry, Gorse, Grey Poplar, Guelder Rose, Hawthorn, Hazel, Holly, Hornbeam, Large-leaved Lime, Mezereon, Midland Hawthorn, Mountain Currant, Osier, Pedunculated Oak, Plymouth Pear, Rose, Rowan, Sea-buckland, Sessile oak, Silver Birch, Small-leaved Lime, Spindle, Spurge-laurel, Walnut, Wayfaring-tree, Western Gorse, White Poplar, Whitebeam, Wild Cherry, Wild Pear, Wild Privet, Wild Service-tree, Willow, and Yew.
J2.3 Boundaries - Hedges - With trees			2. ≥2 m in height. Gaps are not included, nor are hedgerow trees. Where a bank is present, the height of the bank must be excluded; AND ≥1.5 m in width. This should be assessed along the whole length of the hedgerow and the most common width used. Gaps are not included; AND <10% (estimated) of bank or hedgerow length should be occupied by gaps; AND No one gap should be greater than 5 m wide (excluding access points and gates). 3. ≥90% (estimated) of vegetation free from physical damage associated with human activity (excluding habitat management interventions e.g. thinning/ cutting). Examples can include: machinery storage, signage, littering, or other damaging management activities.

Appendix B: Amended visual impact schedules for receptors anticipated to experience a change in view during construction

Table B.1 below details the residential receptors that would experience a change in view as a result of the relocation of the main site compound. These changes will be incorporated into the ES Table of Errata to be submitted as part of Deadline 7. This table supports the Applicant's response to the Examining Authority's Third Written Question 3.5.3.

Table B.1: Revised visual and baseline impact schedules in relation to the change in main site compound

Visual receptor no.	Visual receptor	Existing view	Proposed view during construction	Proposed view during operation	Effects on visual receptors
5	Representative of view from Stockwitch Lodge residential receptor (High sensitivity)	View across a flat field with a fence line boundary hedgerow in the middle distance. Glimpsed views of HGVs can be seen traversing the view above highway and field boundary vegetation in the long distance. The background of the view is formed by a ridgeline in the far distance and mature vegetation amongst the arable land.	During construction glimpsed oblique middle distance views would be available of construction plant, care facilities, site offices, Cement Bound Granular Mixtures (CBGM) and machinery over hedgerow vegetation along field boundaries. Elements of lighting within the construction compound are likely to be visible. Small pockets of vegetation removed as part of the scheme would make a barely noticeable change in the view. It is expected that there would be a Negligible magnitude of impact resulting in a Slight Adverse effect.	During operation the view from this residential property of the widened A303 is predicted to be more filtered than the existing baseline view of the existing A303. This is due to the proposed hedgerow and tree planting along the scheme. However, in Year 1 it is predicted that proposed additional vegetation would be too immature to provide a screening function. The majority of this view would remain in line with the baseline view in Year 1, but by Year 15 the proposed planting scheme would have a positive effect on the view. It is predicted that overall there would be No Change to the magnitude of impact in this view in Year1 due to the road appearing similar to the baseline view, this would result in a Neutral effect. By Year 15 when the proposed planting regime has established a Negligible magnitude of impact is expected resulting in a Slight Beneficial effect.	Construction: Slight Adverse Operation: Year 1: Neutral Year 15: Slight Beneficial

Visual receptor no.	Visual receptor	Existing view	Proposed view during construction	Proposed view during operation	Effects on visual receptors
7	View looking north from northern extent of PROW Y 27/11 (High sensitivity)	This short distance view comprises an arable field in the foreground bounded by a mature hedgerow. To the right of the view, glimpsed views of traffic on the A303 are available at the junction of the B3151 and the A303 adjacent to Wayne's Bar and Bistro. Mature trees and vegetation along the B3151 form the background of the view except where the road junction is to the right of the view.	During construction glimpsed views of construction machinery and plant would be available over construction hoarding where the existing linear belt of shrubs and trees and boundary hedgerow have been removed. In the middle distance, direct, open views onto the A303 would be available. There may be lighting impacts from the construction compound and night works to connect the junction. It is considered that there would be a Major magnitude of effect which would result in a Large Adverse effect.	During operation replacement planting and mitigation works would restore the linear belt of shrubs and trees that have been lost as a result of the scheme. However, glimpsed views of new signage along the B3151 would be visible in the short and middle distance over the proposed replacement hedge in the foreground. In Year 1 the immaturity of the proposed planting would result in their being no mitigating effect. The proposed Camel Cross Junction would move closer to the visual receptor as part of the scheme affording angled views of the proposed A303 as it come out of cutting. Direct open views of traffic and new signage on the dualled A303 and original A303 would be available in Year 1, creating a discordant feature in the view. As proposed native tree and shrub planting matures views of the scheme and the original A303 would be reduced. It is expected that there would be a Moderate magnitude of impact in Year 1 which would result in a Moderate Adverse effect.	Construction: Large Adverse Operation: Year 1: Moderate Adverse Year 15: Slight Adverse

Visual receptor no.	Visual receptor	Existing view	Proposed view during construction	Proposed view during operation	Effects on visual receptors
				However, by Year 15 it is expected that there would be a Negligible magnitude of impact which would result in a Slight Adverse effect.	
19	View from Howell Hill representative of view from Coneygore Farm residential receptor (High sensitivity)	The view across an arable field is heavily screened to the left by a mature tree in the foreground. The arable fields in the short to middle distance are bound by a mature hedge which partially screens the traffic on the A303. In the long distance highway signage and HGVs on the A303 can be seen against the skyline at the crest of Camel Hill.	During construction short to medium distance views would be available of the proposed A303 realignment and embankment works across an arable field. In the long distance glimpsed views over undulating land would be available of the Camel Hill topsoil storage area. Temporary night time effects associated with construction lighting may be afforded in the instance that short term night works are required to integrate the existing A303 with the proposed dualling works. Where vegetation is cleared along the existing A303 open short distance and middle-distance views towards traffic will be available. It is expected that there would be a Major magnitude of impact resulting in a Large Adverse effect.	During operation the proposed replacement and mitigation planting would integrate the proposed scheme with the wider environment and land required for temporary works would be returned to their previous conditions. A proposed 2m bund on top of the proposed embankments would be planted with native planting trees and shrubs. Together these would screen views of traffic on the A303 in Year 15. However, in Year 1 views of the tops of HGVs would be available where planting is still immature. Overall, the volume of visible traffic would be reduced in Year 1 and further reduced in Year 15. It is expected that in Year 1 there would be a Minor magnitude of impact in the view resulting in a Moderate Adverse effect. By Year 15 when proposed planting has matured it is expected that there would be a Negligible magnitude of impact and resulting in a	Construction: Large Adverse Operation: Year 1: Moderate Adverse Year 15: Slight Beneficial

Visual receptor no.	Visual receptor	Existing view	Proposed view during construction	Proposed view during operation	Effects on visual receptors
				Slight Beneficial effect in the view.	
20	View from southern extent of Howell Hill Road representative of residential receptors to the northern extent of West Camel immediately adjacent (High sensitivity)	Open view across rising and undulating pastoral farmland bounded by hedgerow vegetation. To the left of the view residential properties are present and along the ridgeline views of traffic on the A303 are available where no screening vegetation is present. Mature deciduous vegetation can be seen intermittently across the ridge.	During construction long distance open and filtered views would be available of the embankment works. Along the ridge of Camel Hill partially filtered views of the topsoil storage area would be available. Vegetation removed would remove the tall mature trees which form the background of the view. To the left of the view filtered views of embankment works would be available over a native hedgerow in the middle distance. Impacts from lighting are expected where the proposed dualling would connect to the existing A303. It is expected that there would be a Moderate magnitude of impact during construction resulting in a Moderate Adverse effect.	During operation the proposed mitigation and replacement planting works would provide a vegetated screen along the proposed A303 filtering and screening views of traffic. However, in Year 1 the replacement planting would have a minimal effect due to the immaturity of the planting. The Camel Hill topsoil storage area and haul route would be reinstated to previous conditions. Along the western extent of the proposed embankment a proposed 2m bund would be provided to create a false cutting and contain views of most traffic, although glimpsed views of the top of HGVs would be available in Year 1. In Year 15 when planting has matured the proposed road would be screened. Overall it is expected that there would be a Negligible magnitude of change in the view in Year 1 resulting in a Slight Adverse effect. In Year 15 it is predicted that there would be a Minor magnitude of change	Construction: Moderate Adverse Operation: Year 1: Slight Adverse Year 15: Slight Beneficial.

Visual receptor no.	Visual receptor	Existing view	Proposed view during construction	Proposed view during operation	Effects on visual receptors
				in the view resulting in a Slight Beneficial effect.	
21	View from the Leland Trail and Residential Receptors in West Camel Conservation Area (High sensitivity)	The view comprises short distance views of the open space at the centre of West Camel surrounded by characteristic houses and single mature trees. In the long distance glimpsed views of Camel Hill and traffic on the A303 are available. Visible traffic is predominantly from the HGVs which appear against a backdrop of mature trees.	The long distance glimpsed view of Camel Hill between residential properties and mature vegetation would afford views of construction plant and embankment works for the A303 realignment. Temporary night time effects associated with construction lighting may be afforded in the instance that short term night works are required to integrate the existing A303 with the proposed dualling works. Construction works would form a minor part of the overall view. It is expected that there would be a Negligible magnitude of impact resulting in a Slight Adverse effect.	During operation, glimpsed views of the proposed scheme would be available. Proposed linear native trees and shrub vegetation would provide screening of the proposed scheme in Year 15, however in Year 1 they would be too immature to provide screening. There is expected to be an increase of traffic on the road which would slightly increase the visual influence of the road. In Year 1 it is expected that there would be a Negligible magnitude of impact in the resulting in a Slight Adverse effect. In Year 15 it is expected that overall there would be No Change to the magnitude of impact resulting in a Neutral effect.	Construction: Slight Adverse Operation: Year 1: Slight Adverse Year 15: Neutral.
22	View from PROW Y27/5 Leland Trail Long Distance Footpath representative of view from Church of All Saints Grade I Listed Building (Conservation Area) (High sensitivity)	Pastoral farmland with a managed hedgerow can be seen in the foreground. Glimpsed views of rising farmland are available through vegetation and form the extent of the view. Glimpsed long distance views of traffic on the	During construction long distance filtered views would be available of embankment works and Camel Hill topsoil storage area. To the left of the view heavily filtered views of embankment works would be available over a native hedgerow in the	During operation the proposed mitigation and replacement planting along the A303 would filter and screen views of the proposed screening vegetation. However, in Year 1 vegetation would be too immature to provide a proficient screen. The Camel	Construction: Slight Adverse Operation: Year 1: Neutral Year 15: Slight Beneficial

Visual receptor no.	Visual receptor	Existing view	Proposed view during construction	Proposed view during operation	Effects on visual receptors
		A303 are available through intervening vegetation largely in the foreground.	long distance. Temporary night time effects associated with construction lighting may be afforded in the instance that short term night works are required to integrate the existing A303 with the proposed dualling works.. It is expected that there would be a Minor magnitude of impact during construction resulting in a Slight Adverse effect.	Hill topsoil storage area would be returned to its previous state. Glimpsed long distance views would be available of traffic in Year 1 but this would be a very small element within the view. It is expected that there would be No Change in the magnitude of change resulting in a Neutral effect in Year 1. In Year 15 it is expected that there would be a Negligible magnitude of change resulting in a Slight Beneficial effect due to glimpsed views of traffic being removed.	
23	Representative of views from PROW WN 23/8 Leland Trail Long Distance Footpath (High sensitivity)	Open view across undulating pastoral farmland, mature trees along the immediate field boundary interrupt views in the middle and long distance. Glimpsed long distance views are available of clusters of residences across the landscape. In front of the tree lined ridgeline forming the background of the view traffic can be seen on the A303, however at this distance this is a small element of the overall view.	During construction heavily filtered long distance views would be available of embankment works, the haulage route and Camel Hill topsoil storage area. To the left of the view partially filtered views of embankment works would be available through linear mature trees in the middle distance. Impacts from lighting are expected where the proposed dualling would connect to the existing A303. Partially filtered views of the haul route would be	During operation the proposed mitigation and replacement planting along the A303 would filter and screen views of the proposed screening vegetation. However, in Year 1 vegetation would be too immature to provide a proficient screen. The proposed topsoil storage area and haulage route would be returned to its previous state. Glimpsed long distance views would be available of traffic on the A303 in Year 1 but this would be a very small element within the view. It is expected	Construction: Slight Adverse Operation: Year 1: Neutral Year 15: Slight Beneficial

Visual receptor no.	Visual receptor	Existing view	Proposed view during construction	Proposed view during operation	Effects on visual receptors
			available to the left of the view in the long distance where it crosses the field boundaries on Howell Hill. It is expected that there would be a Minor magnitude of impact during construction resulting in a Slight Adverse effect.	that there would be No Change in the magnitude of change resulting in a Neutral effect in Year 1. In Year 15 it is expected that there would be a Negligible magnitude of change resulting in a Slight Beneficial effect due to glimpsed views of traffic being removed.	
24	Representative of view from PROW WN 23/8 Leland Trail Long Distance Footpath and Wales Farm residential receptor (High sensitivity)	Open view across undulating pastoral farmland, mature trees along the immediate field boundary interrupt views in the middle and long distance. Farm buildings and equipment obstruct the right of the view. Heavily filtered long distance views are available of clusters of residences dotted in the landscape. Intermittent glimpses of traffic are available in front of the tree lined ridgeline forming the background of the view. At this distance traffic on the A303 only forms a small part of the overall view.	During construction long distance, partially filtered views would be available of embankment works and Camel Hill topsoil storage area. To the left of the view heavily filtered views of embankment works would be available over a native hedgerow in the long distance. Temporary night time effects associated with construction lighting may be afforded in the instance that short term night works are required to integrate the existing A303 with the proposed dualling works It is expected that there would be a Minor magnitude of impact during construction resulting in a Slight Adverse effect.	During operation the proposed mitigation and replacement planting along the A303 would filter and screen views of the proposed screening vegetation. However, in Year 1 vegetation would be too immature to provide a proficient screen. The proposed topsoil storage area would be returned to its previous state. Glimpsed long distance views would be available of traffic in Year 1 but this would be a very small element within the view. It is expected that there would be No Change in the magnitude of change resulting in a Neutral effect in Year 1. In Year 15 it is expected that there would be a Negligible magnitude of change resulting in a Slight Beneficial effect due to	Construction: Slight Adverse Operation: Year 1: Neutral Year 15: Slight Beneficial

Visual receptor no.	Visual receptor	Existing view	Proposed view during construction	Proposed view during operation	Effects on visual receptors
				glimpsed views of traffic being removed.	
31	Representative of view from eastern extent of PROW WN 23/7 Leland Trail Long Distance Footpath (High sensitivity)	Short distance views available across a pastoral field are shortened by mature tree vegetation along the River Cam. Where gaps in vegetation are available farmland can be seen rising to a ridge lined by mature trees. There are no views of the A303 or traffic.	During construction, heavily filtered views would be available of the construction access and along the top of Camel Hill. Glimpsed views of construction plant and machinery would be available across the top of the field. Existing mature vegetation along the River Cam heavily filters views of the Camel Hill construction plant and the Howell Hill embankment works. Overall it is predicted that there would be a Negligible magnitude of impact resulting in a Slight Adverse effect.	During operation it is not expected that there would be any direct impacts on the views. It is predicted that there would be No Change to the magnitude of impact in Year 1 and Year 15 resulting in a Neutral effect.	Construction: Slight Adverse Operation: Year 1: Neutral Year 15: Neutral
32	Representative of view from Englands Mead residential receptors (High sensitivity)	Long distance open view across the undulating pastoral farmland which rises to a ridge in the long distance. Isolated houses and farmsteads are scattered across the landscape. Fields are bounded by formal hedgerows some including tall mature trees. Well established mature trees along the River Cam are present in the middle distance. Along the ridge	During construction it is predicted that long distance partial views would be available of the Camel Hill topsoil storage area. Long distance glimpsed views of the embankment and construction works at Howell Hill would be available through filtered vegetation. Long distance views towards construction access would be available along Camel	During operation the topsoil storage area would be returned to previous conditions and replacement and mitigation native planting would be implemented along the highways corridor to restore and enhance the linear vegetation along the highway. In Year 1 replacement planting would be too immature to provide any integration or screening. However, by Year 15 vegetation would have	Construction: Slight Adverse Operation: Year 1: Slight Adverse Year 15: Neutral

Visual receptor no.	Visual receptor	Existing view	Proposed view during construction	Proposed view during operation	Effects on visual receptors
		line mature trees and the Queen Camel Radio Station masts can be seen against the skyline. Glimpsed views of HGVs are available	Hill, which would show construction plant tracking across the top of the field. Vegetation removed as part of the works would form a small part of the view overall. It is predicted that there would be a Negligible magnitude of impact resulting in a Slight Adverse effect.	matured to mitigate and integrate the proposed scheme. In Year 1 it is expected that there would be a Negligible magnitude of impact resulting in a Slight Adverse effect. By Year 15 it is judged that there would be a No Change in the magnitude of impact against the baseline view, this would result in No Change to the effect.	
33	View looking north representative of residential properties off West Camel Road (High sensitivity)	Long distance open view comprises a low hedge in the foreground which screens short and middle distance views with Camel Hill and Sparkford Hill forming a ridgeline background. Rural fields and hedgerows cover the slopes of the rising ground with small clusters of houses and isolated farmsteads also visible. Deciduous woodland along the ridgeline screens views of the A303, however to the left of the view glimpsed views of HGVs can be seen where there is no screening vegetation, however these are tiny elements within an expansive view.	During construction it is predicted that long distance views would be available of the Camel Hill topsoil storage area. Long distance open views of the embankment construction works at Howell Hill would also be visible at this distance. Vegetation removed as part of the works would form a small part of the view overall. It is predicted that there would be a Minor magnitude of impact resulting in a Slight Adverse effect.	During operation the topsoil storage area would be returned to previous conditions and replacement and mitigation native planting would be implemented along the highways corridor. This would enhance the linear vegetation along the highway. In Year 1 replacement planting would be too immature to provide any integration or screening. However, by Year 15 vegetation would have matured to mitigate and integrate the proposed scheme. In Year 1 it is expected that there would be a Negligible magnitude of impact resulting in a Slight Adverse effect. By Year 15 it is judged that there would be a No Change in the	Construction: Slight Adverse Operation: Year 1: Slight Adverse Year 15: Neutral

Visual receptor no.	Visual receptor	Existing view	Proposed view during construction	Proposed view during operation	Effects on visual receptors
				magnitude of impact against the baseline view, this would result in No Change to the effect.	
46	Representative of view from Eye Well Bungalow residential receptor and PROW WN 23/36 (High sensitivity)	Short distance view from Eye Well Bungalow, looking south, comprises an orchard in the southern extents of the property boundary, fence lines and a low hedgerow along the eastern and western property boundaries. The existing intersection of Traits Lane with Blackwell Road is currently perceptible in the view. The background of the view is comprised by field boundary vegetation. The view looking north from PROW WN 23/36 comprises immediate views of properties adjacent to Traits lane, including a low boundary hedgerow, a fence line and an orchard in the immediate foreground. Narrow views up Traits Lane are also afforded. Long distance views can be seen over the low hedge on the eastern side of Traits Lane, across arable fields with far distance mature	It is expected that there would be a noticeable change in the view during construction due to the proximity of activities and machinery required for the junction widening and land taken to accommodate the works which will bring works closer in view from Eye Well Bungalow across their garden to the new intersection alignment. Small lengths of hedgerow and fence lines will also be temporarily removed as part of the widening works. Short distance direct views would be available from the PROW WN 23/36 to the construction area. Given the localised scale and temporary nature of the works, overall it is considered there would be a Moderate Change in the magnitude of impact resulting in a Moderate Adverse effect.	During operation it is predicted that overall there would be a Minor Change to the magnitude of impact in this view in Year 1 due to the new intersection appearing similar in nature, albeit slightly wider than the baseline view given the works would bring the junction slightly closer to Eye Well Bungalow, this would result in a Slight Adverse effect in year 1 as any replacement planting would have yet to establish. By Year 15, due to the replacement of lost elements along the properties boundaries (fence line and hedgerow) it is predicted that there would be No Change to the magnitude of impact resulting in a Neutral effect.	Construction: Moderate Adverse Operation: Year 1: Slight Adverse Year 15: Neutral

Visual receptor no.	Visual receptor	Existing view	Proposed view during construction	Proposed view during operation	Effects on visual receptors
		vegetation and Queen Camel Radio Station forming the background of the view. In the middle distance of the view boundary hedgerows, several electrical pylons and associated overhead lines traverse the fields. There are no views available of the A303.			