

From: [Routh, Charles](#)
To: [A303 Sparkford to Ilchester](#)
Subject: RE: NSIP A303 Sparkford to Ilchester Dualling Project - Examining Authority's Additional Written Questions.
RESPONSE DUE BY 3 MAY 2019 TR010036. NE ref: 281142
Date: 17 May 2019 15:28:28

Dear Sir/Madam, apologies for missing your requested deadline, largely due to Natural England resourcing limitations. Our responses to the questions addressed to us are set out in red below:

3.3.2	<p>Biodiversity effects</p> <p>a) Are SSDC and Natural England satisfied with the approach set out in the Biodiversity Offsetting Report [REP4-018]? Not entirely.</p> <p>b) If not, could they please explain precisely any concerns and what effect these concerns may have on the overall approach and results?</p> <p>Natural England reviewed this document and advised Highways England as follows:</p> <p>Natural England very much welcomes the use of the Biodiversity Offsetting Metric as a means to understand whether net gain is being delivered in line with the National Planning Policy Framework.</p> <p>We have not scrutinised this in detail, but are concerned that some of the assumptions made may be overly optimistic. Specifically, it is not readily apparent how Table 3.2: Post-construction Biodiversity Units was populated. In particular, it is not clear how the ratings for Distinctiveness, Difficulty, Condition and Time were arrived at. For example, were they taken from a widely agreed methodology, or were they professional judgement associated with this specific project? If the latter, we advise that the ratings may be inappropriately optimistic. For example, we query whether for Wildflower and Species Rich Grassland, is it reasonable that one can attain good condition of a highly distinctive habitat by mechanical management in 5 years, with only medium difficulty.</p> <p>As we understand it, revisions to the DEFRA metric are likely to be published this spring or summer, which will include standard ratings for Distinctiveness, Difficulty, Condition and Time.</p> <p>In response, Highways England's consultants, advised us that they are satisfied that the assumptions are consistent with Highways England's internal guidance, and we have chosen not to consider this matter further.</p>
3.3.3	<p>Biodiversity effects</p> <p>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</p>

	<p>has achieved this, giving examples from the evidence submitted how they have come to their conclusions?</p> <p>When we looked at the scheme proposals, no obvious significant opportunities to build in beneficial biodiversity features were apparent, due to the nature of the scheme (relatively small, with relatively small development footprint).</p>
3.3.4	<p>Bat surveys</p> <p>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> <p>a) Could the parties explain the latest situation?</p> <p>We do not normally assess development proposals for impacts on protected species outside of designated sites, and so have not a view on this matter.</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 than 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>We do not normally assess development proposals for impacts on protected species outside of designated sites, and so have not a view on this matter.</p>

Regards,

Charles Routh
Team leader – Wiltshire Conservation Team,
Somerset, Avon and Wiltshire Area Team, Natural England.

From: A303 Sparkford to Ilchester
[<mailto:A303SparkfordtoIlchester@planninginspectorate.gov.uk>]
Sent: 29 April 2019 12:12
To: SM-NE-Consultations (NE) <consultations@naturalengland.org.uk>
Cc: A303 Sparkford to Ilchester <A303SparkfordtoIlchester@planninginspectorate.gov.uk>
Subject: TR010036 - A303 Sparkford to Ilchester Dualling Project - Examining Authority's Additional Written Questions. RESPONSE DUE BY 3 MAY 2019

Dear Sirs

Please see the link below to the Examining Authorities Additional Written Questions in relation to the above project. Your organisation has been asked to respond to questions 3.3.2, 3.3.3 & 3.3.4.

<https://infrastructure.planninginspectorate.gov.uk/projects/south-west/a303-sparkford-to-ilchester-dualling/?ipcsection=docs>

Please can you send a response by **Friday 3 May 2019** to:

A303Sparkfordtollchester@planninginspectorate.gov.uk

Kind regards

Dean Alford
Case Officer
National Infrastructure Planning
The Planning Inspectorate, Temple Quay House, Temple Quay, Bristol BS1
6PN
Helpline: 0303 444 5000

Web: <https://infrastructure.planninginspectorate.gov.uk/> (National
Infrastructure Planning)

Web: www.gov.uk/government/organisations/planning-inspectorate (The
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