

## A303 Sparkford to Ilchester Dualling Scheme TR010036

### 8.4 Statement of Common Ground with Somerset County Council and South Somerset District Council

APFP Regulation 5(2)(g)  
Planning Act 2008  
Infrastructure Planning (Applications: Prescribed  
Forms and Procedure) Regulations 2009  
June 2019



Infrastructure Planning

Planning Act 2008

**The Infrastructure Planning  
(Applications: Prescribed Forms and  
Procedure) Regulations 2009**

**A303 Sparkford to Ilchester Dualling  
Scheme**

Development Consent Order 201[X]

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**STATEMENT OF COMMON GROUND**

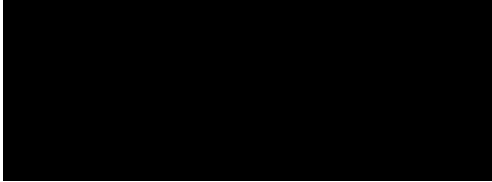
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<b>Regulation Number:</b>	Regulation 5(2)(q)
<b>Planning Inspectorate Scheme Reference</b>	TR010036
<b>Application Document Reference</b>	8.4
<b>Author:</b>	A303 Sparkford to Ilchester Dualling Scheme Project Team, Highways England

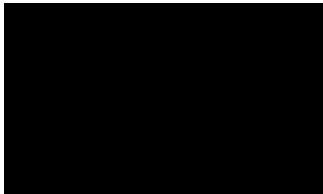
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Rev 0	October 2018	First draft
Rev A	January 2019	Submission for Deadline 2
Rev B	April 2019	Submission for Deadline 5
Rev C	June 2019	Submission for Deadline 8

**STATEMENT OF COMMON GROUND**

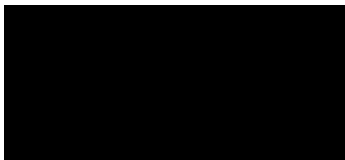
**This Statement of Common Ground has been prepared and agreed by (1) Highways England Company Limited and (2) Somerset County Council and South Somerset District Council.**



**Signed.....**  
**Hannah Sanderson**  
**Senior Project Manager**  
**on behalf of Highways England**  
**Date: 10/06/2019**



**Signed.....**  
**Andy Coupé**  
**Strategic Manager – Infrastructure**  
**Programmes Group**  
**on behalf of Somerset County Council**  
**Date: 10/06/2019**



**Signed.....**  
**Jan Gamon**  
**Lead Specialist – Strategic Planning**  
**on behalf of South Somerset District**  
**Council**  
**Date: 10/06/2019**

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## **1. Introduction**

### **1.1 Purpose of this document**

- 1.1.1 This Statement of Common Ground ("SoCG") has been prepared in respect of the proposed A303 Sparkford to Ilchester Dualling ("the Application") made by Highways England Company Limited ("Highways England") to the Secretary of State for Transport ("Secretary of State") for a Development Consent Order ("the Order") under section 37 of the Planning Act 2008 ("PA 2008").
- 1.1.2 This SoCG does not seek to replicate information which is available elsewhere within the Application documents. All documents are available in the deposit locations and / or on the Planning Inspectorate website.
- 1.1.3 The SoCG has been produced to confirm to the Examining Authority where agreement has been reached between the parties to it, and where agreement has not been reached. SoCGs are an established means in the planning process of allowing all parties to identify and so focus on specific issues that may need to be addressed during the examination.
- 1.1.4 This document relates solely to technical topic based matters and does not include a separate detailed commentary on the provisions within the draft Development Consent Order in its entirety.

### **1.2 Parties to this Statement of Common Ground**

- 1.2.1 This SoCG has been prepared by (1) Highways England as the Applicant and (2) Somerset County Council and South Somerset District Council.
- 1.2.2 Highways England became the Government-owned Strategic Highways Company on 1 April 2015. It is the highway authority in England for the strategic road network and has the necessary powers and duties to operate, manage, maintain and enhance the network. Regulatory powers remain with the Secretary of State. The legislation establishing Highways England made provision for all legal rights and obligations of the Highways Agency, including in respect of the Application, to be conferred upon or assumed by Highways England.
- 1.2.3 Somerset County Council and South Somerset District Council (the Joint Councils) are "interested parties" under the Planning Act 2008 in relation to the project and are planning authorities and SCC is the local highway authority in relation to the proposed works. Additionally, the Joint Councils have a number of other statutory responsibilities in relation to housing, public rights of way, flood management and environmental health, and discretionary powers in relation to well-being and enforcement.

### **1.3 Terminology**

- 1.3.1 In the tables in the Issues chapter of this SoCG, "Not Agreed" indicates a final position, and "Agreed" indicates where the issue has been resolved.

## **1.4 Record of Engagement**

- 1.4.1 Engagement between Highways England and Somerset County Council and South Somerset District Council has been good. In addition to formally consulting Somerset County Council and South Somerset District Council on the scheme design through the consultation process, a number of technical and strategic working groups were formed prior to the submission of the DCO application. These working groups have continued to meet post submission of the application and have helped shape this Statement of Common Ground.
- 1.4.2 A record of engagement is available upon request.

## 2. Issues

### Somerset County Council

Topic	Somerset County Council comment	Highways England response	Status
<b>Traffic and Economics</b>			
Base model	The development of the base traffic model was examined and the following was agreed:	-	-
	The use of the South West Regional Traffic Model (SWRTM) is sufficient to ascertain the rerouting of strategic and local traffic for the proposed scheme	The South West Regional Traffic Model (SWRTM) with local enhancements has been used as the basis for modelling. Therefore, the model gives a good representation of strategic and local traffic for the scheme assessment.	<b>AGREED</b>
	The three time periods in the weekday model and the average hour that represents the summer Friday to Sunday flows are suitable for assessing the proposed scheme.	The base model represents an average weekday in March 2015, whilst a separate summer model has also been developed to represent peak traffic flows during the year for the economic appraisal.	<b>AGREED</b>
	The SWRTM includes the appropriate strategic and local roads near the scheme	The enhanced SWRTM has used a more detailed local network and zoning system as well as local traffic data to provide a good representation of local traffic.	<b>AGREED</b>
	The base year model (March 2015) has been calibrated and validated to an acceptable level against WebTAG criteria. For all three time periods,	The base SATURN model convergence meets WebTAG criteria in all time periods. The model achieves a good	<b>AGREED</b>

Topic	Somerset County Council comment	Highways England response	Status
	<p>models meet WebTAG convergence statistics. Modelled versus observed flows comparison of screenlines shows that the AM and PM models meet WebTAG criteria. The inter peak model is slightly short of meeting the WebTAG 85 percent of the screenlines, instead it meets 83 percent of the screenlines. The model calibration process and resulting model validation is appropriate for assessing the proposed scheme.</p>	<p>level of flow and screenline calibration with required WebTAG criteria is being met in all time periods. The model also achieves link flow validation in line with the WebTAG criteria and screenline validation close to WebTAG criteria. Both journey time routes and segments meet or nearly meets the WebTAG criteria across all time periods.</p> <p>Therefore, the base model calibrates and validates to within acceptable margins of WebTAG criteria and therefore demonstrates a good representation of traffic behaviour in the study area and a robust basis from which forecasts can be developed to assess proposed scheme.</p>	
	<p>The weekday model also has a variable demand component and the VDM was subjected to Realism test in accordance with WebTAG guidance. The results show that, whilst the elasticities for individual trip purposes by car are either weaker or stronger than the WebTAG recommended values, for the trips by car as whole is very close to the recommended value. The variable demand model (VDM) developed for this study is a reasonable tool for assessing the proposed scheme.</p>	<p>The March weekday model is subject to variable demand modelling in accordance with WebTAG. The demand model was subjected to fuel cost, public transport fare and journey time realism testing. The realism test results show that corresponding elasticities are close to WebTAG recommended values. Therefore, the demand model with standard WebTAG parameters provide a sound basis for forecasting.</p>	<b>AGREED</b>
	<p>Based on SCC's analysis the base year model considered to be a reasonable basis on which</p>	<p>The base model calibrates and validates to within acceptable margins of WebTAG</p>	<b>AGREED</b>



Topic	Somerset County Council comment	Highways England response	Status
	develop traffic forecasts and test the impacts of the scheme.	criteria and therefore demonstrates a good representation of traffic behaviour in the study area and a robust basis from which forecasts can be developed to assess proposed scheme.	
	Local information regarding the type and levels of new developments and committed infrastructure changes have been collated and incorporated into the development of the forecast models.	The traffic forecasts account for future proposals for residential and employment developments in the local area as well as corresponding transport network changes. These were identified by undertaking an assessment of the likelihood of each of these proposals coming forward. This was last updated with information from local authorities in December 2017 / January 2018 prior to the traffic modelling and assessment work undertaken for the Development Consent Order application.	<b>AGREED</b>
	The traffic assessment shows network impacts of the proposed scheme in 2023, 2031, 2038 and 2051; these are based on the forecast year of opening of the scheme (2023) and fifteen years after the year of opening. The final forecast year of 2051 model has been used in the economic assessment only, as such the impact of the 2051 growth assumptions on the network are not directly assessed. These are appropriate years for testing the scheme.	Forecast models have been prepared for two forecasting scenarios (Do Minimum – without the proposed scheme and Do Something – with the proposed scheme) and four forecast years (2023 scheme opening year, 2031 intermediate year, 2038 design year and 2051 final forecast year). Intermediate year of 2031 and final forecast year of 2051 were mainly derived for economic appraisal purposes only. Each of the years also included	<b>AGREED</b>

Topic	Somerset County Council comment	Highways England response	Status
		corresponding summer forecasts. The years selected provide data/information for scheme design and appraisal purposes.	
	<p>The forecast matrices have been developed in line with WebTAG guidance. The demand assignments in the forecast models have been tested and the forecast models for all four modelled years (2023, 2031, 2038 and 2051) meet WebTAG criteria. The models are therefore appropriate for testing the scheme and understanding the strategic impacts.</p>	<p>Forecast matrix development involved spatially allocating developments in the core area and then controlling overall demand to National Trip End Model (NTEM) and Road Traffic Forecasts (RTF) as required by WebTAG. Both demand and assignment models meet WebTAG convergence criteria for each forecast year and time period. Forecast model outputs show that traffic flow, routing and journey time impacts at strategic and local levels are sensible.</p>	<b>AGREED</b>
	<p>The results of the checks on the matrix estimation process have shown that the matrix for HGVs (user class 5) does not meet WebTAG criteria.</p>	<p>It is accepted in the documentation that HGV demand does not meet WebTAG thresholds on the matrix estimation changes. This is due to the fact that demand matrices for HGVs in the SWRTM were based on adjustments to the DfT's 2006 Base Year Freight Model matrices and that HGV trip patterns would have changed over the last 10 years. HGVs are only one element of the total vehicles. Since the base model calibrates and validates well for total vehicles and cars it is considered that</p>	<b>AGREED</b>

Topic	Somerset County Council comment	Highways England response	Status
		<p>HGV levels are represented reasonably well though there are changes higher than WebTAG recommended thresholds during matrix estimation. In addition, the recent (2018) lower forecasts issued by the DfT for growth of HGVs mean that this would also be less of a concern.</p>	
Operational assessment	<p>Operational assessments have been carried out for a number of the junctions in the area of the scheme and it is agreed that the operational assessment of individual junctions has been carried out using appropriate tools.</p>	<p>Operational assessments were carried out at the key junctions on the A303 and in the local area using appropriate tools for opening and design years. None of the junctions exceed their capacity in the scheme scenario. The junctions for testing were selected where congestion problems may occur with or without the scheme or where there will be increases in traffic with the scheme.</p>	<b>AGREED</b>
Areas of further discussion	<p>A number of large zones have been disaggregated into smaller zones however the communities of West Camel and Queen Camel have not been defined as individual zones. A select link analysis has been provided to SCC and this gives a better picture of the trips through these zones and resolves this issue.</p>	<p>One of the main activities carried out when adopting SWRTM was to disaggregate large zones near the scheme. Communities in West Camel and Queen Camel have been allocated individual zones. Therefore, traffic movements from these zones are separately identified. Select link analyses were provided to demonstrate the changes for locally-based and longer distance movements in the study area.</p>	<b>AGREED</b>

Topic	Somerset County Council comment	Highways England response	Status
	<p>Impact on West Camel and Sparkford villages – the modelling shows that the scheme is likely to increase traffic through these communities.</p>	<p>It is acknowledged in the reports that West Camel and Sparkford villages experience increased traffic flows compared to Do Minimum.</p> <p>West Camel - Higher forecast traffic flows on the A303 make it difficult for local traffic joining the A303 in the Do Minimum. Therefore, some traffic re-routes through Podimore accessing A303 at Podimore roundabout in forecast Do Minimum forecast years whereas in the Do Something traffic can access A303 using the proposed grade separated junction near West Camel.</p> <p>Sparkford – the increase in southbound traffic in the Do Something case is due to a re-routing of some traffic from the A37 to A359 and the scheme. The increase in northbound direction is due to traffic travelling from south and continuing on the A359 to the north rather than using the A303 for the short stretch from Hazlegrove to the Camelot link to A359 on A303 Sparkford Bypass.</p>	<p><b>AGREED</b></p>
	<p>The County Councils believe that there is a gap in the assessment methodology to determine the impact of the increases in traffic through local villages.</p>	<p>Highways England does not consider the measures suggested to be necessary to make the scheme acceptable and they therefore do not form part of the proposed mitigation measures. Reasons</p>	<p><b>NOT AGREED</b></p>

Topic	Somerset County Council comment	Highways England response	Status
	<p>Due to the increase in traffic through the villages of West Camel and Sparkford and because the County Council believes there is a gap in the assessment methodology to determine the impact of these increases, consideration should be given by the ExA to whether mitigation is required and a mechanism is agreed to secure it.</p>	<p>are set out within the Applicant's response to Action Point 11 (REP7-027) submitted as part of Deadline 7.</p>	
	<p>An Operational assessment of junctions has been carried out for the summer traffic. It is accepted that on Sparkford High Street / The Avenue junction that the summer traffic will be less than the neutral period and will therefore remain under capacity.</p>	<p>Traffic levels at Sparkford High Street / The Avenue junction in the summer are less than in March.</p>	<b>AGREED</b>
	<p>An operational assessment of the junction was carried out using a LINSIG traffic model. This shows that in the 2038 scenario with the A303 improvement is nearing capacity in the evening peak hour as shown in table 12.18 of the ComMA report. As a result, concerns were raised about the ability of the roundabout to cope with peak summer traffic and the impact that this might have on the local road network. Another assessment was carried out by MMSJV to establish the impact of the summer traffic on the junction, the results are set out in the Podimore Roundabout Summer LinSig Analysis Technical Note (HE551507-MMSJV-MTR-000-RP-TR-0035). The results of this work are summarised in the table below, all of these are for the summer interpeak period as per the model. The queue lengths are approximated based on the Linsig outputs by assuming a passenger car unit</p>	<p>As stated within Section 12.4 of the Combined Modelling and Appraisal Report submitted as part of the DCO (APP-151), the 2038 Do-Something scenario based on the March-based traffic assignment model leads to a maximum Degree of Saturation (DoS) of 0.87 which is under the desirable capacity threshold of 0.9. A maximum queue length in 2038 of 22 PCUs is predicted.</p> <p>It is acknowledged that higher traffic flows occur on the A303 corridor during summer peak periods due to higher levels of strategic traffic movement. These peak levels of traffic would not usually be considered in design on the</p>	<b>AGREED</b>

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	<p>(PCU) is 6m long and using the guidance for approximating queues which states “When a Lane is oversaturated the Maximum Queue within each cycle will grow progressively over the modelled time period. This means that the Mean Maximum Queue will be approximately half the final queue at the end of the modelled time period”.</p> <p>SCC considered that interim mitigation measures would be appropriate until such times as an upgrade as part of a wider scheme could be delivered and that a commitment to do this is secured through the DCO..</p> <p>The matter has been discussed over the course of the Examination and Highways England has since provided a note on the active management of Podimore Roundabout (REP7-027), which SCC accepts.</p> <p>Table:</p> <table border="1" data-bbox="398 1031 1061 1177"> <thead> <tr> <th rowspan="2">Roundabout entry arm</th> <th colspan="2">2023</th> <th colspan="2">2031</th> <th colspan="2">2038</th> </tr> <tr> <th>DoS</th> <th>Queue length (m)</th> <th>DoS</th> <th>Queue length (m)</th> <th>DoS</th> <th>Queue length (m)</th> </tr> </thead> <tbody> <tr> <td>A303 EB</td> <td>97%</td> <td>467</td> <td>106.6%</td> <td>960</td> <td>110.4%</td> <td>1232</td> </tr> <tr> <td>A372</td> <td>94.8%</td> <td>148</td> <td>100.7%</td> <td>379</td> <td>109.2%</td> <td>509</td> </tr> <tr> <td>A37</td> <td>89.5%</td> <td>65</td> <td>119.3%</td> <td>840</td> <td>103.7%</td> <td>364</td> </tr> </tbody> </table>	Roundabout entry arm	2023		2031		2038		DoS	Queue length (m)	DoS	Queue length (m)	DoS	Queue length (m)	A303 EB	97%	467	106.6%	960	110.4%	1232	A372	94.8%	148	100.7%	379	109.2%	509	A37	89.5%	65	119.3%	840	103.7%	364	<p>grounds of disproportionate cost and impact that catering for the very highest peak traffic levels would require. However, it is expected that the higher traffic levels would be mitigated by adjusting the traffic signal timings at Podimore Roundabout as far as is practicable to cater for the higher summer traffic flows. Therefore, the Applicant does not agree that measures should be taken to address the increased queues at Podimore Roundabout as part of the scheme.</p>	
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<b>Engineering</b>																																					

Topic	Somerset County Council comment	Highways England response	Status																																
Layout	SCC have accepted in principle the proposed layout of local roads and junctions, as per the published scheme. Detailed design matters have not yet been agreed.	-	<b>AGREED</b>																																
Layout	<p>SCC have accepted the design speeds as follows:</p> <table border="1"> <thead> <tr> <th>Link</th> <th>Design speed</th> </tr> </thead> <tbody> <tr> <td>B3151 Link</td> <td>85kph</td> </tr> <tr> <td>Camel Cross Junction Link</td> <td>30kph</td> </tr> <tr> <td>Downhead Junction Link</td> <td>30kph</td> </tr> <tr> <td>Downhead Lane</td> <td>50kph</td> </tr> <tr> <td>Stearth Hill Link</td> <td>50kph</td> </tr> <tr> <td>Stearth Hill Link to Old A303</td> <td>85kph</td> </tr> <tr> <td>Howell Hill Link (West)</td> <td>50kph</td> </tr> <tr> <td>Howell Hill Link (east)</td> <td>50kph</td> </tr> <tr> <td>Traits Lane</td> <td>50kph</td> </tr> <tr> <td>Gason Lane</td> <td>50kph</td> </tr> <tr> <td>Vale Farm Link</td> <td>30kph</td> </tr> <tr> <td>Camel Hill Link</td> <td>60kph</td> </tr> <tr> <td>Ridge Copse Link</td> <td>85kph</td> </tr> <tr> <td>Stearth Hill (north)</td> <td>30kph</td> </tr> <tr> <td>Stearth Hill (south)</td> <td>30kph</td> </tr> </tbody> </table>	Link	Design speed	B3151 Link	85kph	Camel Cross Junction Link	30kph	Downhead Junction Link	30kph	Downhead Lane	50kph	Stearth Hill Link	50kph	Stearth Hill Link to Old A303	85kph	Howell Hill Link (West)	50kph	Howell Hill Link (east)	50kph	Traits Lane	50kph	Gason Lane	50kph	Vale Farm Link	30kph	Camel Hill Link	60kph	Ridge Copse Link	85kph	Stearth Hill (north)	30kph	Stearth Hill (south)	30kph	No response needed.	<b>AGREED</b>
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Layout	SCC have accepted the carriageway cross sections as follows:	No response needed.	<b>AGREED</b>																																

Topic	Somerset County Council comment		Highways England response	Status
	<b>Link</b>	<b>Design speed</b>		
	B3151 Link	7.3m carriageway. No hardstrips		
	Camel Cross Junction Link	6.5m carriageway. No hardstrips 6.6M + Widening (TD40/94)		
	Downhead Junction Link	6.5m carriageway. No hardstrips 6.6M + Widening (TD40/94)		
	Downhead Lane	6.5m carriageway. No hardstrips		
	Steart Hill Link	6.5m carriageway. No hard-strips		
	Steart Hill Link to Old A303	7.3m carriageway. No hard-strips		
	Howell Hill Link (West)	6.5m carriageway. No hardstrips		
	Howell Hill Link (east)	6.5m carriageway. No hardstrips		
	Traits Lane	Existing carriageway		
	Gason Lane	Existing carriageway		
	Vale Farm Link	6.5m carriageway. No hardstrips		



Topic	Somerset County Council comment		Highways England response	Status
	Camel Hill Link	7.3m carriageway. No hard strips		
	Ridge Copse Link	6.5m carriageway. No hardstrips		
	Stearth Hill (north)	6.5m carriageway. No hardstrips		
	Stearth Hill (south)	6.5m carriageway. No hardstrips		
Layout	SCC have agreed that, where proposals comprise departures from standards on local roads, agreement to this via the Engineering Technical Working Group and subsequent technical approval via Highways England's WebDAS system would also constitute technical approval by SCC.		No response needed.	<b>AGREED</b>
Layout	Somerset County Council agree with the proposed layout of Downhead Junction.		Noted.	<b>AGREED</b>
	Particular attention is required to the visibility splay at the Downhead Lane entry to the junction. This is yet to be resolved to the satisfaction of SCC.  Req13(1) will require amending to ensure that SCC has the ability to review and approve the detailed design of this junction configuration.		This issue will be specifically raised in the audit brief for subsequent road safety audits, with a request for recommendations.  SCC will be involved in further Road Safety Audits regarding proposed local roads.  The dDCO provides at Requirement 13 that the detailed design will be submitted to the Secretary of State for approval following consultation with the relevant	<b>NOT AGREED</b>

Topic	Somerset County Council comment	Highways England response	Status
		<p>planning authority and local highway authority. Under Requirement 5, details of that consultation (including changes sought and whether they have been made, and where changes have not been made why not), must be submitted along with the application for approval of the detailed design. The Secretary of State will therefore have the views of the Councils before him when making any decision on the detailed design.</p>	
Layout	<p>SCC believe the retained section of Steart Hill should be widened to 6.5m in order to carry traffic to Camel Hill Quarry.</p> <p>NEXT STEP: Req13(1) will require amending to ensure that SCC has the ability to review and approve this point of detail.</p>	<p>This issue will be specifically raised in the audit brief for subsequent road safety audits, with a request for recommendations.</p> <p>SCC will be involved in further Road Safety Audits regarding proposed local roads.</p> <p>The dDCO provides at Requirement 13 that the detailed design will be submitted to the Secretary of State for approval following consultation with the relevant planning authority and local highway authority. Under Requirement 5, details of that consultation (including changes sought and whether they have been made, and where changes have not been made why not), must be submitted along</p>	<b>NOT AGREED</b>

Topic	Somerset County Council comment	Highways England response	Status
		with the application for approval of the detailed design. The Secretary of State will therefore have the views of the Councils before him when making any decision on the detailed design.	
Layout	<p>Further optimisation of some access arrangements, including geometry and visibility, is required.</p> <p>If any amendments affect the existing public highway they will require the approval of the LHA who will be responsible for that infrastructure.</p> <p>NEXT STEP: Req13(1) will require amending to enable SCC to review and approve the detail where it impacts upon the LRN.</p>	The dDCO provides at Requirement 13 that the detailed design will be submitted to the Secretary of State for approval following consultation with the relevant planning authority and local highway authority. Under Requirement 5, details of that consultation (including changes sought and whether they have been made, and where changes have not been made why not), must be submitted along with the application for approval of the detailed design. The Secretary of State will therefore have the views of the Councils before him when making any decision on the detailed design.	<b>NOT AGREED</b>
Layout	There are multiple locations where the proposed A303 and associated earthworks are in close proximity to the retained sections of the former A303. This raises concerns regarding the ability to provide road restraint systems or fencing should it be deemed necessary. Furthermore, given the parallel alignment there is also a concern regarding the potential for dazzle particularly during the hours of darkness. Consideration will need to be given to the installation of anti-dazzle fencing.	<p>Highways England will consult Somerset County Council during further development of proposals at these locations, regardless of proposed ownership.</p> <p>The dDCO provides at Requirement 13 that the detailed design will be submitted to the Secretary of State for approval following consultation with the relevant</p>	<b>NOT AGREED</b>

Topic	Somerset County Council comment	Highways England response	Status
	<p>Instances of close proximity between the new dual carriageway and proposed local infrastructure occur at the following locations:</p> <ul style="list-style-type: none"> <li>• Ch2100 – Ch2300: Close proximity to “Former A303 (Camel Hill to Steart Hill)</li> <li>• Ch3000 – Ch3300. Close proximity to ‘Howell Hill Link (east)</li> <li>• Ch3250 – Ch3400. Close proximity to ‘Steart Hill (south)’</li> <li>• Ch4350 – Ch4550. Close proximity to Vale Farm Link</li> <li>• Ch4550 – Ch4800. Close proximity to ‘Camel Hill Services Turning Head’</li> </ul> <p>NEXT STEP: Req13(1) will require amending to ensure that SCC has the ability to review and approve the detail design.</p>	<p>planning authority and local highway authority. Under Requirement 5, details of that consultation (including changes sought and whether they have been made, and where changes have not been made why not), must be submitted along with the application for approval of the detailed design. The Secretary of State will therefore have the views of the Councils before him when making any decision on the detailed design.</p>	
Non-motorised user provision	<p>NMU survey results cannot be relied upon as a true representation of usage levels of public rights of way due to the methodology used.</p>	<p>The survey methodology and results are summarised in Appendix 12.1 of the Environmental Statement (APP-093). This document explains that two sets of surveys were conducted in 2016. One survey was undertaken during the summer holiday period (albeit on weekdays) and one survey was undertaken during term time in</p>	<b>NOT AGREED</b>

Topic	Somerset County Council comment	Highways England response	Status
		<p>September (again, during weekdays).</p> <p>The objective of the surveys was to capture a snap-shot of the overall level of usage of rights of way, and in this respect the results have proved useful. The surveys highlighted a selection of relatively well used rights of way within an area that is otherwise lightly used. It is not considered that results during daylight evenings or weekends on this relatively lightly trafficked network would have provided a significantly different conclusion, given that the surveys were undertaken in good weather and during school holidays.</p>	
Non-motorised user provision	<p>There is currently no mitigation in place for unrecorded rights that could be impacted by the development if they are later found to exist. There are currently 2 applications to modify the Definitive Map, which will be directly affected by the development, and a further one abutting and one in close proximity.</p> <p>Normal practice is that a development/ developer would not proceed until rights had been clarified and subsequently stopped up or diverted, as the risks are high should the route(s) have to be reinstated following construction (and likely obstruction). In this case we have been prepared</p>	<p>Highways England believes there are currently 4 applications to modify the Definitive Map and Statement registered on Somerset County Council's Rights of Way portal (<a href="https://roam.somerset.gov.uk/roam/map">https://roam.somerset.gov.uk/roam/map</a>) within or in the vicinity of the scheme. It is not practical in the DCO to include multiple contingent status for these rights of way and any determination of higher rights after grant of the DCO should be addressed in the normal process. Further information is given within the response to Action Point 6 submitted at Deadline 5</p>	<b>NOT AGREED</b>

Topic	Somerset County Council comment	Highways England response	Status
	<p>not to object to the development proceeding prior to clarification of the existence of any rights/ higher rights, but this has been on the basis of seeking the applicant to provide a scheme of mitigation.</p> <p>The issue has been discussed over the course of the Examination. SCC provided their final position on the matter in their Deadline 7 response (REP7-035). In summary, SCC maintains the position that the applicant should commit to mitigation for the potential event that it is determined that unrecorded rights exist that the development will impact upon.</p>	(REP5-020).	
Non-motorised user provision	The proposals for rights of way are in broad terms generally acceptable, to SCC.	Noted.	<b>AGREED</b>
Non-motorised user provision	SCC do not agree with the decision to omit the upgrade of right of way Y30/UN (Higher Farm Lane) from the proposed DCO.	Higher Farm Lane is located outside of the scheme extents and therefore the Applicant is not proposing to upgrade the bridge as part of these works.	<b>NOT AGREED</b>
Non-motorised user provision	SCC has raised concerns that there is the possibility that the 1996 Sparkford to Ilchester Side Roads Order has some validity even though the scheme was not constructed. SCC's final position on the matter is detailed in the Deadline 7 response (REP7-035). In summary, the current drafting promoting partial revocation within the order limits would result in a number of cul-de-sacs and isolated sections of right of way. Whilst the applicant gave reassurance at ISH5 that the issue in relation to Y 30/29 could be addressed	Highways England have revoked the Side Road Orders within the dDCO in so far as it is in force and within the Order limits, with the exception of the bridleway lying to the north of Track 1 (being Y30/29), which bridleway is not revoked. Further information is contained within the Applicant's Additional Legal Submission document (document	<b>NOT AGREED</b>

Topic	Somerset County Council comment	Highways England response	Status
	<p>through DCO redrafting, the additional legacy issues that have been identified call into question the best way to approach this issue. It would not be an acceptable outcome to the County Council to update the Definitive Map and Statement with the effect of the 1996 SRO and then further update with the effects of the partial revocation within the DCO limits. It would create a nonsensical rights of way network in places, which the County Council should not be burdened with to resolve.</p> <p>The County Council's position is thus; that the 1996 SRO should be revoked in full, save for:</p> <ul style="list-style-type: none"> <li>• Schedule 1 – new highway A (bridleway)</li> <li>• Schedule 2 – new highway G (bridleway)</li> </ul>	<p>reference 9.40, Volume 9, Revision A) submitted as part of Deadline 8.</p>	
Non-motorised user provision	<p>Traffic Management Plan and Construction Environment Management Plan do not fully incorporate off-road traffic</p>	<p>Accepted. The outline Traffic Management Plan which was issued to SCC in December 2018 clarifies that Highways England's main contractor will be in the best position to develop these aspects as they will depend upon the exact sequencing of the works. The latest version of the Outline TMP is contained within Annex B.5 of the Outline Environmental Management Plan (REP7-020).</p>	<b>AGREED</b>
Non-motorised user provision	<p>Two routes between Traits Lane and Gason Lane is considered excessive. One would suffice.</p>	<p>Agreed. Following discussions with the Defence Infrastructure Organisation (DIO), consent has been obtained under</p>	<b>NOT AGREED</b>

Topic	Somerset County Council comment	Highways England response	Status
	<p>SCC's final position on the matter is detailed in the Deadline 7 response (REP7-035) – see covering letter and section titled “Examination Timetable - Comments on the accepted non-material change Request”</p>	<p>section 135(1) of the Planning Act 2008 from the appropriate Crown authority to the inclusion of the Crown land within the DCO. A letter was submitted to the Examining Authority by the DIO dated 11 April 2019 which confirmed this consent (AS-028) for a footpath, rather than bridleway status. Therefore, the Applicant now proposes using the Crown land, which avoids taking land from Mr Hewlett. This was included within the non-material change request submitted by the Applicant in April 2019 (REP6-014) which has subsequently been accepted by the ExA.</p>	
<p>Non-motorised user provision</p>	<p>33% gradient between BE-BY considered excessive for equestrians.</p>	<p>Accepted. This is a short section of bridleway that is positioned on an engineered slope. The gradient will need to be softened during detail design</p>	<p><b>AGREED</b></p>
<p>Non-motorised user provision</p>	<p>A schedule of widths and limitations is required as part of the DCO to enable the Definitive Map &amp; Statement to be accurately updated.</p> <p>As set out in SCC's Deadline 6 response (REP6-019), whilst the widths and limitations of public rights of way has been addressed in part, the Council requires the approval of this detail as they are best placed to ensure that the widths and limitations are compliant with the relevant Rights of</p>	<p>This will be part of the detailed design and is not currently available and so cannot be provided as part of the DCO. The protective provisions within the DCO proposed by the Applicant in favour of SCC include an obligation to provide a schedule of widths and limitations to SCC for consultation before any works</p>	<p><b>NOT AGREED</b></p>



Topic	Somerset County Council comment	Highways England response	Status															
	Way and equalities legislation, and will be capable of being legally evented onto the Definitive Map & Statement and are not in conflict with the RoW & Access Plans with regard to placement and alignment. Any ambiguity will only cause to create problems for the Council in the future in its roles as Highway Authority and Surveying Authority.	are commenced that interfere with the local highway.																
Non-motorised user provision	Schedules 3 and 4 have a number of minor errors (as previously referenced) that require correction/clarification.	These have been amended and included within the dDCO (Article 13(9)).	<b>AGREED</b>															
Non-motorised user provision	A schedule of privately maintained rights of way is required, otherwise they will default to Highway Authority responsibility.	These have been amended and included within the dDCO (Article 13 (9)).	<b>AGREED</b>															
Signage	SCC have accepted the proposed signing strategy as shown on the following drawings:	No response needed.	<b>AGREED</b>															
	<table border="1"> <thead> <tr> <th>No</th> <th>Title</th> <th>Rev</th> </tr> </thead> <tbody> <tr> <td>HE551507-MMSJV-HGN-000-DR-CH-0206</td> <td>Tourist Signage Strategy</td> <td>P09</td> </tr> <tr> <td>HE551507-MMSJV-HGN-000-DR-CH-0212</td> <td>Primary Route Signage Strategy</td> <td>P09</td> </tr> <tr> <td>HE551507-MMSJV-HGN-000-DR-CH-0213</td> <td>Non-Primary Route Signage Strategy</td> <td>P09</td> </tr> <tr> <td>HE551507-MMSJV-HGN-000-DR-CH-0214</td> <td>Local Route Signage Strategy</td> <td>P08</td> </tr> </tbody> </table>			No	Title	Rev	HE551507-MMSJV-HGN-000-DR-CH-0206	Tourist Signage Strategy	P09	HE551507-MMSJV-HGN-000-DR-CH-0212	Primary Route Signage Strategy	P09	HE551507-MMSJV-HGN-000-DR-CH-0213	Non-Primary Route Signage Strategy	P09	HE551507-MMSJV-HGN-000-DR-CH-0214	Local Route Signage Strategy	P08
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Topic	Somerset County Council comment			Highways England response	Status
	HE551507-MMSJV-HGN-000-DR-CH-0207	Cycle Signage Strategy	P05		
Signage	<p>SCC have requested design approval of traffic sign faces.</p> <p>NEXT STEP: Req13(1) will require amending to ensure that SCC has the ability to review and approve the detail design proposals.</p>			<p>Highways England will consult Somerset County Council regarding detail design proposals for all advance direction sign and advance direction sign faces, regardless of proposed ownership.</p> <p>The dDCO provides at Requirement 13 that the detailed design will be submitted to the Secretary of State for approval following consultation with the relevant planning authority and local highway authority. Under Requirement 5, details of that consultation (including changes sought and whether they have been made, and where changes have not been made why not), must be submitted along with the application for approval of the detailed design. The Secretary of State will therefore have the views of the Councils before him when making any decision on the detailed design.</p>	<b>NOT AGREED</b>
Signage	<p>No through road signs will be required at the southern limits of Traits Lane and Gason Lane. These are currently not included in the published scheme proposals. This could be included within a S. 171 (instead of a S. 278).</p>			<p>Highways England agree with the benefits of this and are willing to enter into a section 278 agreement to secure provision of these signs voluntarily.</p>	<b>AGREED</b>

Topic	Somerset County Council comment	Highways England response	Status
	<p>A mechanism for securing this needs to be agreed.</p> <p>SCC has prepared a note for Deadline 8 providing justification in relation to why the S.278 does meet the legal tests for inclusion within the DCO.</p> <p>In addition, SCC is concerned that if the applicant has no formal commitment to enter into the S.278 agreement there would be no formal requirement for the applicant to provide the necessary signage, which is essential in ensuring highway safety.</p> <p>In addition, the detail of signage locations will need to be agreed and therefore an appropriate mechanism for securing this will be required.</p>	<p>Highways England is preparing a Section 278 agreement to secure this mechanism, rather than a Section 171 agreement. The Applicant does not believe that the provision of a section 278 agreement meets the legal tests for it to be included as a requirement within the DCO and so it is proposed that this is entered into outside of the DCO. The Applicant has made submissions to this effect to the ExA (REP7-027 and REP7-028).</p>	<b>NOT AGREED</b>
Structures	<p>In principle, SCC do not object to any of the proposals for structures associated with the Strategic Road Network (however note comment below).</p>	<p>No response needed.</p>	<b>AGREED</b>
Structures	<p>The LHA have advised that footpath Y30/31 is upgraded to bridleway status and this would require changes to the parapets on the accommodation bridge that carries Y30/3.</p> <p>NEXT STEP Agreement in relation to the accommodation bridge is still required.</p>	<p>Higher Farm Lane is located outside of the scheme extents and therefore Highways England is not proposing to upgrade the bridge as part of these works. There are therefore no further actions in relation to this item.</p>	<b>NOT AGREED</b>
Regulatory measures	<p>SCC have accepted proposals in principle for speed limits as set out in the Permanent Speed</p>	<p>Noted.</p>	<b>AGREED</b>

Topic	Somerset County Council comment	Highways England response	Status
	Limit Order Plans and Schedule 3 of the draft Development Consent Order.		
	Consideration is being given to whether the Schedule can be amended to ensure that SCC have the ability to review and approve the detail relating to the extents of speed restriction.	The dDCO provides at Requirement 13 that the detailed design will be submitted to the Secretary of State for approval following consultation with the relevant planning authority and local highway authority. Under Requirement 5, details of that consultation (including changes sought and whether they have been made, and where changes have not been made why not), must be submitted along with the application for approval of the detailed design. The Secretary of State will therefore have the views of the Councils before him when making any decision on the detailed design.	<b>NOT AGREED</b>
Regulatory measures	SCC have accepted proposals in principle for roads classification as set out in the Classification of Roads Plans and Schedule 3 of the draft Development Consent Order.	Noted.	<b>AGREED</b>
Regulatory measures	SCC require the section of existing B3151 carriageway that is subject to the national speed limit, between the limit of Highways England's scheme and the commencement of the existing 40mph speed limit just north of the cross-roads at Bridgehampton, to be subject to a 50mph speed limit.	Noted.	<b>AGREED</b>
	Noted that HE intend to implement the speed limit via a S.278.	Agreed, Highways England is preparing a Section 278 agreement voluntarily to	<b>AGREED</b>

Topic	Somerset County Council comment	Highways England response	Status
		secure this mechanism, rather than a Section 171 agreement.	
	<p>Mechanism for securing this and the funding for the Traffic Regulation Order legalising the speed limit alteration will need to be agreed.</p> <p>SCC has prepared a note for Deadline 8 providing justification in relation to why the S.278 does meet the legal tests for inclusion within the DCO.</p> <p>In addition, SCC is concerned that if the applicant has no formal commitment to enter into the S.278 agreement there would be no formal requirement for the applicant to provide the necessary speed limit, which is essential in ensuring highway safety.</p>	Highways England is preparing a Section 278 agreement to secure this mechanism. The Applicant does not believe that the provision of a section 278 agreement meets the legal tests for it to be included as a requirement within the DCO and so it is proposed that this is delivered outside of the DCO. The Applicant has made submissions to this effect to the ExA (REP7-027 and REP7-028).	<b>NOT AGREED</b>
Limits of maintenance responsibility	SCC have accepted in principle that they will become responsible for all classified A, B and unclassified roads identified in the Classification of Roads Plans and Schedule 3 of the draft Development Consent Order.	Noted.	<b>AGREED</b>
	The timing provisions as set out within the DCO are however not yet agreed and Article 14 will need amending accordingly.	The Applicant does not agree that Article 14 needs amending.	<b>NOT AGREED</b>
	NEXT STEP– Req13(1) will require amending to enable SCC to review and approve the detail relating to the boundary/interface between SRN and the LRN.	The dDCO provides at Requirement 13 that the detailed design will be submitted to the Secretary of State for approval following consultation with the relevant planning authority and local highway authority. Under Requirement 5, details	<b>NOT AGREED</b>

Topic	Somerset County Council comment	Highways England response	Status
		of that consultation (including changes sought and whether they have been made, and where changes have not been made why not), must be submitted along with the application for approval of the detailed design. The Secretary of State will therefore have the views of the Councils before him when making any decision on the detailed design.	
Limits of maintenance responsibility	SCC require that limits of responsibility for the finished works are clearly defined.	Agreed, the limits of responsibility will be confirmed as part of the detailed design for the scheme. This is secured through Requirement 13(2)(i) of the DCO.	<b>AGREED</b>
	SCC require to be the approving authority under Requirement 13.	The dDCO provides at Requirement 13 that the detailed design will be submitted to the Secretary of State for approval following consultation with the relevant planning authority and local highway authority. Under Requirement 5, details of that consultation (including changes sought and whether they have been made, and where changes have not been made why not), must be submitted along with the application for approval of the detailed design. The Secretary of State will therefore have the views of the Councils before him when making any decision on the detailed design.	<b>NOT AGREED</b>
De-trunking	SCC have accepted <b>in principle</b> (with one exception noted below) the proposal to de-trunk the	The Applicant has provided a response to this issue to Action Point 8 <i>Report of</i>	<b>NOT AGREED</b>

Topic	Somerset County Council comment	Highways England response	Status
	<p>elements of existing A303 carriageway identified in the de-trunking plans (HE5515507-MMSJV-LSI-000-DR-UU-2162 to 2164, and for them to be incorporated into the local road network.</p> <p>SCC have provided comments at Deadline 6 (REP6-019) in respect of amendments to the DCO to exclude sections of de-trunked roads which are of little or no public benefit by separating schedule 3 part 2 into Part 2A (de-trunked roads to become vested in SCC) and Part 2B (de-trunked roads to remain under the control and management of the Applicant):</p> <p>The timing provisions as set out within the DCO are not yet agreed and Article 14 will need amending accordingly.</p>	<p><i>discussions between the parties on potential design change on road passing Camel Hill Services and Other proposed dul-de-sacs</i> (see paragraphs 1.2.3 to 1.2.11 of REP6-007). The Applicant considers that changing the status of the road to the diner and the petrol filling station, as well as the consented coffee shop location, into a private road would be detrimental to those businesses. It would transfer liability for a road, which is required to be open to use by the public in order for these businesses to trade, to a private road which these businesses would then have to maintain. It would be unreasonable that these businesses, while paying taxes and rates, would not benefit from the current provision of access to a publicly maintainable highway. The Applicant does not consider that this is a realistic or fair suggestion and will not be promoting it.</p> <p>Article 14 of the dDCO has been amended as appropriate (REP5-006).</p>	
De-trunking	SCC have accepted the proposal to reduce the width of the former A303 (between Camel Cross and Steart Hill) to 7.3m (with no hard-strips).	No response needed.	<b>AGREED</b>

Topic	Somerset County Council comment	Highways England response	Status
De-trunking	SCC have accepted the proposal to reduce the width of the former A303 (west of Howell Hill) to 6.5m (with no hard-strips).	No response needed.	<b>AGREED</b>
De-trunking	SCC have accepted the proposal to reduce the width of the former A303 (east of Steart Hill) to 6.5m (no hard-strips).	No response needed.	<b>AGREED</b>
De-trunking	SCC have accepted the proposal to reduce the width of the former A303 (west of Hazlegrove Roundabout) to 6.5m (with no hard-strips). SCC objects to de-trunking of this length of the A303 given the limited public utility that would exist, the risk of anti-social behaviour (including illegal gypsy and traveller encampments) SCC have provided comments at Deadline 6 (REP6-019) in respect of amendments to the DCO to exclude sections of de-trunked roads which are of little or no public benefit by separating schedule 3 part 2 into Part 2A (de-trunked roads to become vested in SCC) and Part 2B (de-trunked roads to remain under the control and management of the Applicant):	Highways England's position is set out within the response to Action Point 8 of the Deadline 6 report (REP6-007).	<b>NOT AGREED</b>



Topic	Somerset County Council comment	Highways England response	Status
De-trunking	<p>There is a need for a minimum 12 month maintenance period, Stage 3 and 4 Road Safety Audits and for any remedial work to be completed as a result of the Road Safety Audits. prior to the roads being incorporated into the local highway network, and Article 14 will need amending accordingly</p> <p>Amended Protective Provisions have been proposed by the County Council.</p>	<p>Highways England's contractor will provide a 52 week defect liability period from completion on all works.</p> <p>Highways England agree that Road Safety Audits 3 and 4 will be undertaken and have invited SCC to take part. Highways England will review the recommendations and undertake the remedial works as required.</p> <p>The requirement to undertake these Audits is secured through the protective provisions in favour of SCC proposed by the Applicant as part of the DCO.</p> <p>The Stage 3 RSA and any subsequent works will be undertaken prior to transfer to SCC.</p>	<b>NOT AGREED</b>
	<p>SCC require that the assets to be de-trunked are clearly recorded, inspected, rehabilitated and commissioned prior to hand-over. Although both SCC's and the Applicant's version of the Protective Provisions make some provision for this, SCC is of the view that the schedule of condition should be extended to include all affected highways (not just those within the order limits) and the Applicant's version does not provide sufficient reassurance that the assets will be rehabilitated prior to hand-over</p>	<p>This is provided for in the draft Protective Provisions.</p>	<b>NOT AGREED</b>

Topic	Somerset County Council comment	Highways England response	Status
	because the Applicant does not accept SCC being the approval authority. .		
Private means of access	SCC are concerned regarding the transmission of mud and loose material from proposed private accesses onto the local road network.	All accesses will be of a bound construction for a distance of 5 metres back from the edge of the local road carriageway, or until the point at which the access drains away from the local road, whichever is greatest.	<b>AGREED</b>
	NEXT STEP: Req13(1) will require amending to ensure that SCC has the ability to review and approve the detailed design of the access where they adjoin the LRN.	The dDCO provides at Requirement 13 that the detailed design will be submitted to the Secretary of State for approval following consultation with the relevant planning authority and local highway authority. Under Requirement 5, details of that consultation (including changes sought and whether they have been made, and where changes have not been made why not), must be submitted along with the application for approval of the detailed design. The Secretary of State will therefore have the views of the Councils before him when making any decision on the detailed design.	<b>NOT AGREED</b>
Lighting	It is SCC's practice to apply guidance by the Institution of Lighting Professionals and provide street lighting at conflict areas – being junctions, intersections, roundabouts and pedestrian crossings where significant streams of motorised traffic intersect with each other, or with other road	A change to the lighting strategy would require a change to the Environmental Impact Assessment that has been submitted in the form of the Environmental Statement as part of the DCO submission. The Applicant provided	<b>NOT AGREED</b>

Topic	Somerset County Council comment	Highways England response	Status
	users such as pedestrians and cyclists. However we recognise that the Applicant has undertaken an assessment using DMRB in proposing where street lighting should be provided. We also note that the scheme has already been the subject of a stage 1 Road Safety Audit and it will also be subject to a Road Safety Audit post completion. It will be important that the post completion Road Safety Audit and any remedial work is completed prior to the highway becoming maintainable by the Local Highway Authority. Provision for this should be made in Articles 13 and 14.	a response to Action Point 9 detailing the underbridge lighting assessment that has taken place (REP7-027).	
Lighting	SCC require DNO supply to their lighting installations to be from a live un-metred supply. This will be a factor in the determination of maintenance responsibility.	Noted, although this is a detailed design point and so the Applicant is not in a position to agree this at stage.	<b>NOT AGREED</b>
Lighting	Responsibility for proposed system of lighting at Hazlegrove Roundabout is yet to be resolved, although SCC's view at this time is that Highways England would retain maintenance responsibility.	Noted, although this is a detailed design point and so the Applicant is not in a position to agree this at stage.	<b>NOT AGREED</b>
Drainage	Detailed drainage proposals confirming that only surface water runoff from the local highway network discharges to Pond 4 will need to be submitted before SCC are able to accept maintenance responsibility for this pond.	Highways England have confirmed that they will be the maintaining authority for all ponds proposed as a result of the scheme.	<b>AGREED</b>
	Further consideration of alternative drainage features that reduce the maintenance burden on the adopting authority is required.	The dDCO provides at Requirement 13 that the detailed design will be submitted to the Secretary of State for approval following consultation with the relevant planning authority and local highway	<b>NOT AGREED</b>

Topic	Somerset County Council comment	Highways England response	Status
	<p>Req13(1) will require amending to ensure that SCC has the ability to review and approve the detailed aspects of the proposed drainage where it impacts upon the LRN.</p>	<p>authority. Under Requirement 5, details of that consultation (including changes sought and whether they have been made, and where changes have not been made why not), must be submitted along with the application for approval of the detailed design. The Secretary of State will therefore have the views of the Councils before him when making any decision on the detailed design.</p>	
<p>Traffic Management</p>	<p>Details for the management of traffic during construction are not yet clear through the proposed formation of a Traffic Management Working Group in 2019 is noted. SCC have commented in detail on potential traffic management impacts in its Local Impact Report (REP2-019).</p> <p>NEXT STEP: The DCO needs to include provision for construction traffic management proposals to be submitted to SCC for review and approve.</p>	<p>Highways England have developed an Outline Traffic Management Plan (REP7-020) and have begun consulting Somerset County Council on these proposals. The main contractor will continue to develop these proposals throughout 2019 and leading up to commencement on site. This will include the formation of a Traffic Management Working Group in 2019 comprising membership from Highways England, the main contractor and Somerset County Council. The objective of this group will be to:</p> <ul style="list-style-type: none"> <li>• Ensure ongoing co-ordination and co-operation between HE and SCC.</li> <li>• Ensure adequate information is prepared for review by SCC as</li> </ul>	<p><b>NOT AGREED</b></p>

Topic	Somerset County Council comment	Highways England response	Status
		<p>the consenting authority for TTROs.</p> <ul style="list-style-type: none"> <li>• Ensure any significant TM operations (for example full closure of the A303) are planned well in advance.</li> </ul> <p>The dDCO provides at Requirement 13 that the detailed design will be submitted to the Secretary of State for approval following consultation with the relevant planning authority and local highway authority. Under Requirement 5, details of that consultation (including changes sought and whether they have been made, and where changes have not been made why not), must be submitted along with the application for approval of the detailed design. The Secretary of State will therefore have the views of the Councils before him when making any decision on the detailed design.</p>	
Traffic Management	Where the site boundary incorporates the local highway network, confirmation of roles and responsibilities relating to winter maintenance, hedge cutting, visibility splay maintenance and gully cleansing will need to be submitted and approved by SCC. Pre-construction condition surveys / dilapidation surveys will also be required, as will agreement on response times to rectify damage /	The Protective Provisions in favour of SCC proposed by the Applicant as part of the DCO now include an obligation on the Applicant to use reasonable endeavours to agree a DLOA with SCC. However, it has been noted that the Applicant does not accept the request for SCC to have approval rights. The Outline	<b>NOT AGREED</b>

Topic	Somerset County Council comment	Highways England response	Status
	<p>intervention level.</p> <p>NEXT STEP: The DCO needs to include provision for a Detailed Local Operating Agreement to be submitted to SCC for review and approval</p>	<p>Environmental Management Plan (which contains the Outline Traffic Management Plan) is secured as a certified document under Article 43. Anything required in that is therefore required by the DCO.</p>	
Drainage	<p>SCC believe that there are further opportunities to include sustainable drainage systems within the scheme.</p> <p>It's noted that the applicant has amended Requirement 14; this amendment is acceptable.</p>	<p>Text has been added within Requirement 14 of the dDCO for a review of the SUDS opportunities at detailed design.</p> <p>Highways England and Somerset County Council will hold a working group meeting at the commencement of the detailed design stage, aimed at identifying possible additional sustainable drainage features that could be considered for incorporation into the consented scheme.</p>	<b>AGREED</b>
	<p>Noted that HE intend to hold a working group meeting, however this needs to be secured as part of the DCO. Matters could be agreed by virtue of a planning Requirement.</p>	<p>The dDCO provides at Requirement 13 that the detailed design will be submitted to the Secretary of State for approval following consultation with the relevant planning authority and local highway authority. Under Requirement 5, details of that consultation (including changes sought and whether they have been made, and where changes have not been made why not), must be submitted along with the application for approval of</p>	<b>NOT AGREED</b>

Topic	Somerset County Council comment	Highways England response	Status
		the detailed design. The Secretary of State will therefore have the views of the Councils before him when making any decision on the detailed design.	
Drainage	<p>Surveys and connectivity reports of all existing drainage systems affected by the works are required.</p> <p>NEXT STEP: Provision within the DCO is required (Requirement 14) to enable SCC to determine the extent of the scope of the connectivity surveys, review the findings and request improvements, where necessary. In addition, SCC seek at amendment to Requirement 13 to include “Local Highway Authority” as a consultee.</p>	<p>The scope of drainage surveys for any drainage that is due to be severed, diverted or stopped up as part of the works will include a Connectivity Report. Requirement 14 concerns drainage design and sets out specific surveys which are to be carried out. Requirement 14 now details the local highway authority as a consultee. This includes surveys of drainage assets at proposed connections. These surveys are accordingly already secured within the DCO.</p>	<b>AGREED</b>
Drainage	<p>Req13(1) will require amending to enable SCC to review and approve the detail design of the private access drainage arrangements where they adjoin the LRN.</p>	<p>The dDCO provides at Requirement 13 that the detailed design will be submitted to the Secretary of State for approval following consultation with the relevant planning authority and local highway authority. Under Requirement 5, details of that consultation (including changes sought and whether they have been made, and where changes have not been made why not), must be submitted along with the application for approval of the detailed design. The Secretary of</p>	<b>NOT AGREED</b>

Topic	Somerset County Council comment	Highways England response	Status
		State will therefore have the views of the Councils before him when making any decision on the detailed design.	
Drainage	Confirmation is sought that the proposed design will control the overall volume, as well as the overall rate of runoff with sufficient attenuation provided.	Attenuation has been provided, with discharge limited to 1% annual exceedance probability (1 in 100-year event) plus 40% to account for the effects of climate change (Flood risk assessments: climate change allowances, Environment Agency), to no greater than the undeveloped rate of runoff, determined by the calculation of the mean annual peak runoff for a greenfield site (Qbar).	<b>AGREED</b>
Drainage	The drainage proposal is generally supported. It is recommended that opportunities are sought, where possible, during the design to enhance water management in the area, benefitting local flood resilience.	Accepted. The strategy to retrospectively imposed Qbar discharge criterion provides a significant betterment to the baseline condition across the development.  A Flood Risk Assessment has been conducted and a drainage strategy has been developed to ensure the scheme does not increase the susceptibility of the local area to flooding.  Evidence in Flood Risk Assessment (APP-059) and Drainage Strategy Report (APP-060), included with Environmental Statement.	<b>AGREED</b>



Topic	Somerset County Council comment	Highways England response	Status
Drainage	Confirmation is sought over the responsibility of the drainage assets.	Agreed, the limits of responsibility will be confirmed as part of the detailed design for the scheme. This is secured through Requirement 13(2)(i) of the DCO.	<b>AGREED</b>
	SCC require to be the approving authority under Requirement 13.	The dDCO provides at Requirement 13 that the detailed design will be submitted to the Secretary of State for approval following consultation with the relevant planning authority and local highway authority. Under Requirement 5, details of that consultation (including changes sought and whether they have been made, and where changes have not been made why not), must be submitted along with the application for approval of the detailed design. The Secretary of State will therefore have the views of the Councils before him when making any decision on the detailed design.	<b>NOT AGREED</b>
Effects on archaeological interests	<p>The early documents that formed the original application are accepted as meeting the requirements of the initial phase of the assessment.</p> <p>SCC can confirm that we have received the Documents (REP2-005).</p> <p>The reports are acceptable in terms of professional standards and contain sufficient information to describe the significance of the archaeology.</p>	Geophysics and a trench evaluation for the majority of the scheme, excluding the revised compound location, has been completed. The results of the geophysics surveys and archaeological trial trenching were submitted as part of the Examination on 23 January 2019 (REP2-005) and have been shared with SSDC and SCC. The results are considered	<b>AGREED</b>

Topic	Somerset County Council comment	Highways England response	Status
	<p>It is noted that archaeological evaluation by way of geophysics and trench evaluation undertaken for the revised compound location has been undertaken. South West Heritage Trust on behalf of SCC provided comments on the draft OHWSI. A final OHWSI was submitted by the Applicant at Deadline 6 (REP6-003).</p>	<p>sufficient to inform detailed design and mitigation.</p> <p>Archaeological evaluation by way of geophysics and trench evaluation is being undertaken for the revised compound location. The results of these surveys have been shared with SSDC and SCC and submitted to the Examining Authority (REP6-008 and REP6-009).</p> <p>A draft outline heritage Written Scheme of Investigation (OHWSI) informed by the results of the geophysical investigation and trial trenching, was issued to Historic England (HBMCE), SSDC and SCC for comment. The final OHWSI was submitted to the Examination at Deadline 6 (REP6-003).</p>	
Effects on archaeological interests	<p>Regarding the Archaeological Trenching Methodology, the idea for weekly monitoring meetings is supported and it is noted that the results will feed into the DCO process due to timescales.</p>	<p>This is noted. Agreement that the method of archaeological evaluation geophysics / trench evaluation is appropriate (including trial trench spec). Weekly monitoring visits with SCCs archaeological advisor have been undertaken during the trench evaluation works.</p>	<b>AGREED</b>
Material Assets and	Assessment methodology	No comments.	<b>AGREED</b>

Topic	Somerset County Council comment	Highways England response	Status								
Waste											
Material Assets and Waste	Study area	No comments	<b>AGREED</b>								
Material Assets and Waste	<p>The Councils are satisfied with the approach, assessment methodology, identified likely effects and proposed mitigation measures presented by the developer in the documents reviewed. We do, however, have a number of observations on the baseline data presented in Chapter 10 of the Environmental Statement and the proposed Site Waste Management Plan which link to waste generation in Somerset; latest data for landfill capacity in Somerset, including inert landfill; and, the operational status of Somerset waste sites, but we do not consider these affect the overall outcome of the assessment.</p> <p>With regard to the baseline data, SCC previously advised that the quoted data was from the 2016 AMR, Table 1 "as published in WTP1/Waste Core Strategy" ie the baseline data. More recent data in the public domain can be found in Table 2 - Somerset waste site capacity data 2016 and this reports a significant decrease in inert landfill capacity, with further discussion on page 12. Due to the limited remaining capacity of inert landfill in Somerset, the AMR process has introduced additional monitoring of inert recovery waste sites (the number of sites making an annual site return to the EA and annual tonnage receipts) and this can</p>	<p>Somerset County Council were contacted via email on 12 November 2018 to provide updated data in relation to landfill capacity in Somerset, including inert landfill, and the operational status of Somerset waste sites. Highways England received this updated data from Somerset County Council via email on 18 November 2018.</p> <p>The revised data has been reviewed against that which was reported within Chapter 10 Material Assets and Waste of the Environmental Statement (APP-047). Table 2 of the 2015/16 AMR presents the following waste site capacity data for 2016 in Somerset:</p> <table border="1"> <tbody> <tr> <td>Recycling</td> <td>3,075,987 tonnes pa</td> </tr> <tr> <td>Other recovery</td> <td>0 tonnes pa</td> </tr> <tr> <td>Non-hazardous landfill capacity</td> <td>3,155,391m<sup>3</sup></td> </tr> <tr> <td>Inert landfill capacity</td> <td>50,357m<sup>3</sup></td> </tr> </tbody> </table>	Recycling	3,075,987 tonnes pa	Other recovery	0 tonnes pa	Non-hazardous landfill capacity	3,155,391m <sup>3</sup>	Inert landfill capacity	50,357m <sup>3</sup>	<b>AGREED</b>
Recycling	3,075,987 tonnes pa										
Other recovery	0 tonnes pa										
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Inert landfill capacity	50,357m <sup>3</sup>										

Topic	Somerset County Council comment	Highways England response	Status
	<p>be found on pages 14/15. Further discussion of the management of inert wastes in Somerset can also be found in the Inert Waste Review published by the county council in 2015. The report can be accessed via the county council website: <a href="http://www.somerset.gov.uk/policies-and-plans/policies/somerset-waste-plan/">http://www.somerset.gov.uk/policies-and-plans/policies/somerset-waste-plan/</a></p>	<p>This data reports a higher recycling capacity, a lower recovery capacity and lower remaining landfill capacity for both non-hazardous and inert landfill than the data which was presented within Chapter 10 Material Assets and Waste of the Environmental Statement (APP-047). However, it is noted in Chapter 10 Material Assets and Waste of the Environmental Statement (APP-047) that the capacity of inert landfill disposal in Somerset is extremely limited and is likely to be used up within the next few years at the current disposal rates, which is consistent with the information contained within the 2016 Somerset Inert Waste Review.</p> <p>The assessment presented within Chapter 10 Material Assets and Waste of the Environmental Statement (APP-047) has been undertaken assuming a 'worse-case' scenario which assumes that all inert waste would require disposal in landfill. Under this scenario, the assessment concluded that the scheme would result in a reduction or alteration in the capacity of waste infrastructure in Somerset which would result in Significant Adverse effects. Taking into</p>	

Topic	Somerset County Council comment	Highways England response	Status
		<p>consideration the differing capacity data outlined in the table above, it is not considered that this would alter the outcomes of the assessment, and therefore, we do not propose to update the Chapter as there would be no material change to the assessment or mitigation proposals. Mitigation that has been proposed is in line with Policy WCS2 (Recycling and Reuse of Inert Waste) of the Waste Core Strategy and includes the production and implementation of the Site Waste Management Plan and identifying ways to re-use or recycle inert waste such as in quarry restoration. An Outline Site Waste Management Plan has been produced (submitted as part of the Outline Environmental Management Plan) (REP7-020) which will be updated as the proposals become more detailed. The CEMP (secured under Requirement 3(2)(f)(vi) of the DCO) must contain a Site Waste Management Plan and both SCC and SSDC will be consulted on the CEMP. The full Site Waste Management Plan will be taken into consideration the limited availability of inert landfill capacity in Somerset.</p>	

Topic	Somerset County Council comment	Highways England response	Status
Material Assets and Waste	Potential impacts	No comments	<b>AGREED</b>
Material Assets and Waste	Design and mitigation measures	No comments	<b>AGREED</b>
Material Assets and Waste	Assessment of likely significant effects (construction)	No comments	<b>AGREED</b>
Material Assets and Waste	Assessment of likely significant effects (operation)	No comments	<b>AGREED</b>
Material Assets and Waste	Monitoring	No comments	<b>AGREED</b>

### South Somerset District Council

Topic	Sub-section	South Somerset District Council Comment	Highways England Response	Status
Air Quality	Baseline and Assessment Methodology	SSDC are confident that the baseline information and assessment methods used in respect of air quality modelling is satisfactory. There appears to be no significant changes to air quality from the proposed scheme itself and as such, no mitigation measures have been proposed.	Noted.	<b>AGREED</b>
Air Quality	Study Area	SSDC content with the receptors included within the assessment but raised the point that this designated site Whitesheet Hill Site of Special Scientific Importance (SSSI) was outside the South Somerset District Council boundary and therefore advised consultation with surrounding local authorities about air quality as the Affected Road Network (ARN) is so large.	The Applicant also contacted Wiltshire Council informing them of the Affected Road Network (ARN) and assessment results. No response from Wiltshire Council was received.	<b>AGREED</b>
Air Quality	West Camel and Sparkford High Street	There are two areas of concern to the Council, West Camel and Sparkford High Street where it is predicted the scheme will result in significantly increased traffic movements which may have an adverse effect on air quality. Further investigation is needed to ensure these areas will not	Chapter 5 Air Quality of the Environmental Statement (APP-042) outlines the assessment undertaken for air quality impact of the scheme during operation at the worst affected receptors.  The consideration of the impact at Hazel Grove Lodge on Sparkford High Street (1 of	<b>AGREED</b>

Topic	Sub-section	South Somerset District Council Comment	Highways England Response	Status
		<p>exceed air quality limits and to determine whether appropriate mitigation measures are necessary. The Council seeks the opportunity to engage with the developer at the detailed design stage to ensure the national air quality objectives continue to be met within South Somerset.</p>	<p>the worse affected receptors) concludes that concentrations of PM<sub>10</sub> and NO<sub>2</sub> at these human health receptors are expected to be well below the respective air quality objectives. The predicted effects from the operation of the scheme on local air quality in Sparkford is therefore concluded to be not significant so no mitigation measures are proposed.</p> <p>The impact at receptors in West Camel is not significant as the predicted change in traffic flows through West Camel on Fore Street is below the criteria for assessment, as set out in the Design Manual for Roads and Bridges (DMRB) guidance. Nonetheless, "The Hollies" on Plowage Lane which is located adjacent to the existing A303 has been modelled and this receptor is predicted to experience an improvement in air quality as a result of the scheme due to the change in alignment of the A303 (the A303 moves further away from the receptor).</p>	
Noise and Vibration	Baseline and Assessment Methodology	<p>SSDC are confident that the baseline information and assessment methods used in respect of noise and vibration is satisfactory, the assessment methods used are appropriate and the presentation of the results clearly demonstrate the likely effects the</p>	<p>As detailed within Schedule 2 Part 1 of the draft Development Consent Order (dDCO) (APP-017), no part of the authorised development is to commence until a Construction Environmental Management Plan (CEMP) has been prepared in consultation with the relevant planning</p>	<b>AGREED</b>



Topic	Sub-section	South Somerset District Council Comment	Highways England Response	Status														
		<p>proposed scheme will have during construction and when in operation.</p> <p>Noise modelling has been conducted and where appropriate has included mitigation measures, this coupled with low noise road surfacing will help to reduce the level of noise.</p> <p>It is expected and understood that Best Practice Measures will be implemented during construction to mitigate the adverse effects of noise and vibration. Approval is to be obtained from the District Council through the Section 61 process which will ensure any mitigation identified will have no residual significant impacts.</p>	<p>authority and the local highway authority, and submitted and approved in writing by the Secretary of State. The CEMP must be substantially in accordance with the outline construction environmental management plan certified under article 43.</p> <p>Table 4.1 of the Outline Environmental Management Plan (APP-148) that was submitted as part of the Development Consent Order (DCO) application details that a Section 61 is required to deliver the CEMP. The Section 61 would be agreed with the Environmental Health Officer at South Somerset District Council. The requirement for a Section 61 agreement is further noted within Table 4.1 of the Consents and Agreements Position Statement (APP-019).</p>															
Noise and Vibration	Baseline and Assessment Methodology	Hawk House Bed-and-Breakfast could be regarded as a residential receptor due to the owners living on the site.	<p>Our assessment did not classify Hawk House Bed and Breakfast as residential. The OS property type code was "CH". See table below for the LA10 18hr façade levels at Hawk House.</p> <table border="1"> <thead> <tr> <th rowspan="2">Receiver</th> <th colspan="4">LA10 18hr façade</th> </tr> <tr> <th>DMDY Day</th> <th>DSO Y Day</th> <th>DMDY Day</th> <th>DSD Y Day</th> </tr> </thead> <tbody> <tr> <td>HAWK HOUSE</td> <td>71.2 dB</td> <td>64.0 dB</td> <td>71.4 dB</td> <td>65.0 dB</td> </tr> </tbody> </table>	Receiver	LA10 18hr façade				DMDY Day	DSO Y Day	DMDY Day	DSD Y Day	HAWK HOUSE	71.2 dB	64.0 dB	71.4 dB	65.0 dB	<b>AGREED</b>
Receiver	LA10 18hr façade																	
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HAWK HOUSE	71.2 dB	64.0 dB	71.4 dB	65.0 dB														

Topic	Sub-section	South Somerset District Council Comment	Highways England Response	Status
Noise and Vibration	West Camel and Sparkford High Street	There are two areas of concern to the Council where we believe there would be a significant increase in traffic movements, namely West Camel and Sparkford High Street. This may have an adverse effect on local residents in terms of increased noise levels.	<p>The noise reduction in the opening year is 7.2dB which is classified as major beneficial</p> <p>On the particular issue of the Sparkford Community, the noise increase of up to 1.3dB (detailed in paragraph 11.10.61 of Chapter 11 Noise and Vibration, APP-048) is due to increased traffic on Sparkford High Street. This is because the scheme will reduce journey times between Sparkford and Ilchester making the route via the High Street more attractive to vehicles travelling from Frome to destinations south-west of Ilchester, and vice-versa. It is expected that some traffic that currently uses the A361 and A37 for this route would divert to using the A361, A359 and A303 so increasing the traffic along Sparkford High Street.</p> <p>An early iteration of the noise model seen by the local authorities showed large noise increases in West Camel due to a modelling error associated with speed banding. Results from the model used in the assessment are given in Table 1 of Appendix A of this document and show that the largest increase is a 2.3dB increase in the short-term (classified as 'minor' by DMRB) to a noise level of 46.5dB LA10,18h which is below LOAEL, the lowest observable adverse effect level. No significant adverse effects are</p>	<b>NOT AGREED</b>

Topic	Sub-section	South Somerset District Council Comment	Highways England Response	Status
			anticipated in West Camel and most receptors are exposed to noise below LOAEL with a very few exposed above this level and then by less than 3dB.	
Noise and Vibration	West Camel and Sparkford High Street	The EPU agree with the assessment and the findings of the noise assessment described above.	Noted.	<b>AGREED</b>
Noise and Vibration	West Camel and Sparkford High Street	If traffic calming is provided for West Camel or Sparkford as a result of the scheme and this gives rise to increased noise, we would welcome the opportunity to engage with the developer to ensure the national and local planning objectives continue to be met within South Somerset.	Highways England does not consider the measures suggested to be necessary to make the scheme acceptable and they therefore do not form part of the proposed mitigation measures. Reasons are set out within the Applicant's response to Action Point 11 (REP7-027) submitted as part of Deadline 7.	<b>NOT AGREED</b>
Noise and Vibration	Mitigation	There are 2 properties that will be significantly affected by operational noise once the scheme is open to traffic (as stated in Figure 11.5 in Chapter 11 Noise and Vibration of the ES), however, the mitigation embedded in the scheme design and secondary double glazing for the 2 properties will be sufficient to mitigate the effects of the operational noise.	Noted.	<b>AGREED</b>
Noise and Vibration	Construction	The District Council ask that piling is avoided at night in locations where it	As detailed within Schedule 2 Part 1 of the dDCO (APP-017), no part of the authorised	<b>AGREED</b>

Topic	Sub-section	South Somerset District Council Comment	Highways England Response	Status
		may have a noise or vibration impact during construction.	development is to commence until a CEMP has been prepared in consultation with the relevant planning authority and the local highway authority and submitted and approved in writing by the Secretary of State. The CEMP must be substantially in accordance with the outline construction environmental management plan certified under article 43. NV4 of Table 3.1 in the OEMP includes this mitigation measure.	
Noise and Vibration	Assessment Methodology during Construction	The District Council seek a number of clarifications associated with the monitoring to be undertaken during construction, including the locations where MMSJV would anticipate monitoring to take place, an outline of the methodology that would be applied, and what actions would be taken in the event of a breach.	<p>As detailed within Schedule 2 Part 1 of the dDCO (APP-017), no part of the authorised development is to commence until a CEMP has been prepared in consultation with the relevant planning authority and the local highway authority and submitted and approved in writing by the Secretary of State. The CEMP must be substantially in accordance with the outline construction environmental management plan certified under article 43.</p> <p>Row NV6 of Table 3.1 in the Outline Environmental Management Plan (APP-148) states that '<i>Routine noise and vibration monitoring to be carried out during construction works in addition to monitoring at those properties identified as at risk from significant adverse effects from linear works and in the vicinity of construction compounds.</i></p>	<b>AGREED</b>

Topic	Sub-section	South Somerset District Council Comment	Highways England Response	Status
			<p><i>Monitoring would include long term measurements at locations where construction activity is likely to exceed 10 working days'. Table 4.1 of the Outline Environmental Management Plan (APP-148) details that a Section 61 is required to deliver the CEMP, which will also detail monitoring requirements during construction. The Section 61 would be agreed with the Environmental Health Officer at South Somerset District Council. The requirement for a Section 61 agreement is further noted within Table 4.1 of the Consents and Agreements Position Statement (APP-019).</i></p>	
Noise and Vibration	Construction	<p>It will be necessary to inform both South Somerset District Council and residents of the dates of the works and likely level of disturbance but most important the end date of each activity.</p>	<p>As detailed within Schedule 2 Part 1 of the dDCO (APP-017), no part of the authorised development is to commence until a CEMP has been prepared in consultation with the relevant planning authority and the local highway authority and submitted and approved in writing by the Secretary of State. The CEMP must be substantially in accordance with the outline construction environmental management plan certified under article 43.</p> <p>Table 4.1 of the Outline Environmental Management Plan (APP-148) that was submitted as part of the DCO application details that a Section 61 is required to deliver</p>	<b>AGREED</b>

Topic	Sub-section	South Somerset District Council Comment	Highways England Response	Status
			<p>the CEMP. The Section 61 would be agreed with the Environmental Health Officer at South Somerset District Council. The requirement for a Section 61 agreement is further noted within Table 4.1 of the Consents and Agreements Position Statement (APP-019).</p> <p>Row NV3 of Table 3.1 in the Outline Environmental Management Plan (APP-148) also details this mitigation.</p>	
Noise and Vibration		<p>The District Council require a manned hotline for complaints during construction to be provided that will enable the Local Authority to direct any complaints made to them direct to the contractors.</p>	<p>As detailed within Schedule 2 Part 1 of the dDCO (APP-017), no part of the authorised development is to commence until a CEMP has been prepared in consultation with the relevant planning authority and the local highway authority and submitted and approved in writing by the Secretary of State. The CEMP must be substantially in accordance with the outline construction environmental management plan certified under article 43.</p> <p>Table 4.1 of the Outline Environmental Management Plan (APP-148) that was submitted as part of the DCO application details that a Section 61 is required to deliver the CEMP. The Section 61 would be agreed with the Environmental Health Officer at South Somerset District Council. The</p>	<b>AGREED</b>

Topic	Sub-section	South Somerset District Council Comment	Highways England Response	Status
			<p>requirement for a Section 61 agreement is further noted within Table 4.1 of the Consents and Agreements Position Statement (APP-019).</p> <p>Row NV3 of Table 3.1 in the Outline Environmental Management Plan (APP-148) also details this mitigation.</p>	
Cultural Heritage	Baseline and Assessment Methodology	The scheme is within an area of high historic and cultural value and whilst the assessment has been undertaken in accordance with the Design Manual for Roads and Bridges (DMRB), which is the accepted methodology for infrastructure projects, and sets out a logical sequence for assessment and review, the assessment for some assets is queried by the District Council.	Noted.	<b>AGREED</b>
Cultural Heritage	Baseline and Assessment Methodology	A draft list of heritage assets to be scoped in for the cultural heritage detailed assessment (to be included within the Environmental Statement (ES)) was consulted upon and SSDC were broadly supportive of the list but asked that the list be restructured so it was easier to understand where assets had been grouped.	Prior to the DCO submission, the list of assets was agreed with the Conservation Officer. This officer has since left the District Council and the Council is securing external support for the project on cultural heritage and landscape matters.	<b>AGREED</b>

Topic	Sub-section	South Somerset District Council Comment	Highways England Response	Status
		<p>This officer has since left the District Council and the Council is securing external support for the project on cultural heritage and landscape matters.</p>		
Cultural Heritage	Baseline and Assessment Methodology	<p><b>Group Assessments</b> <b>Paragraph 2.1.1 of the Cultural Heritage DBA:</b> Adjacent heritage assets are assessed within a common group and assigned a 'GR' reference. This works well for heritage assets of the same value/sensitivity, or where the Group value/sensitivity is equal to the highest individual asset in the group.</p> <p>It's potentially misleading in relation to individual buildings in a group where assets of 'High' value/sensitivity are part of a lower valued group. GR06 (Podimore), GR07 (Queen Camel Conservation Area) and GR08 (West Camel Conservation Area) are examples. These historic settlements are assigned 'Medium' value/sensitivity but include Grade I and II* listed buildings that would normally be considered to have a 'High' value/sensitivity.</p>	<p>The value of the group has been derived from the cumulative value of the heritage assets and the contribution the group makes to the historic resource as defined in Table 6.1 of Chapter 6, Cultural Heritage (APP-043) and Table 2.1 of Appendix 6.1 Cultural Heritage Desk Based Assessment (APP-067). It takes into account the range of assets within each group. Where initial work suggested that assets were likely to experience different levels of significant effect, these were removed from the groups and assessed as individual assets. It also ensured that assets outside the 1 kilometre study area, but still made a contribution to the heritage value of an important group, were included in the assessment.</p> <p>The reason to group assets in this way was to ensure a proportionate assessment as required by paragraph 5.127 of the National Policy Statement for National Networks (NPSNN).</p>	<b>NOT AGREED</b>



Topic	Sub-section	South Somerset District Council Comment	Highways England Response	Status
		<p>The assessment of the significance of effects for these 'High' value/sensitivity is therefore downgraded, and the assessment could mask a significant effect on a heritage asset that is not taken forward for further consideration.</p> <p>The Council requires the applicant to assess assets of higher value/sensitivity in a Group individually, with any resulting increase in the significance of effects included in the Cultural Heritage ES with appropriate design, mitigation and enhancement measures to be agreed with the District Council.</p> <p>The Applicant's response is considered to confirm the Council's misgiving with this element of the methodology. The value for the group is derived from the cumulative, i.e. combined, value of the heritage assets. Therefore, a grade I or grade II* listed building, which would normally be assigned a 'high' value under the DMRB, is assessed a 'medium' value.</p>	<p>The Applicant notes that the approach was agreed with SSDC's Conservation Officer during the Environmental Technical Working Groups in December 2017 and February 2018 prior to completion of the Environmental Statement.</p>	

Topic	Sub-section	South Somerset District Council Comment	Highways England Response	Status
		<p>The Applicant states that where the initial work suggested that assets were likely to experience different levels of significant effect, these assets were removed from a group and assessed individually. However, this approach introduces an additional element of professional judgement rather than relying on a uniform application of the DMRB assessment criteria.</p> <p>Only three of the scoped-in Groups comprise of mixed value assets (GR06 Podimore, GR07 Queen Camel CA, and GR08 West Camel CA). They contain a total of 6 grade I or II* listed buildings, whose individual assessment would not be disproportionate.</p>		
Cultural Heritage	Baseline and Assessment Methodology	Cultural assets in Sparkford require a detailed assessment because of increased traffic movements.	During the environmental assessment process, the increased traffic movements along Sparkford High Street were considered when reviewing assets brought forward for full assessment. Although an increase in traffic was identified, the type of level of increase was not considered to impact the setting of heritage assets along Sparkford High Street. Sparkford High Street is already	<b>AGREED</b>

Topic	Sub-section	South Somerset District Council Comment	Highways England Response	Status
			<p>part of the strategic road network and sees traffic levels which already impact the historic setting of the heritage assets along Sparkford High Street. These traffic movements have changed the character of Sparkford High Street from a quiet rural settlement, to a modern traffic through route lined with a mix of modern and historic buildings. As such the additional traffic movements are not considered to change this current situation and will not adversely impact the setting any further.</p> <p>Vibration effects in terms of peak particle velocity (which is the parameter used to assess the impact of vibration on vulnerable buildings) would remain the same with increased traffic during operation, and therefore, no impacts are anticipated. This is because the peak particle velocity (ppv), as measured in mm/s, is a function of each vehicle pass-by and not a cumulative measure. Increasing the number of vehicles would increase the number of measured events, but not the magnitude of any individual event. Seen graphically as a function of time, increasing the number of vehicles would increase the number of peaks in the particle velocity profile, but not increase the value of any particular peak.</p>	

Topic	Sub-section	South Somerset District Council Comment	Highways England Response	Status
Cultural Heritage	Baseline and Assessment Methodology	The inclusion of Royal Naval Air Station (RNAS) Yeovilton for detailed assessment was discussed and SSDC thought that with the scale of the asset, and the fact that it was inward looking with modern development dominating, that a detailed assessment was not required.	RNAS Yeovilton was included in the list of heritage assets to be brought forward for full assessment and it was agreed not to be assessed any further by the SSDC Conservation Officer. This list can be found in in Appendix B, Table B.1 of Appendix 6.1, Cultural Heritage Desk Based Assessment (APP-067), of the Environmental Statement.	<b>AGREED</b>
Cultural Heritage	Baseline and Assessment Methodology	It was agreed during the Environmental TWG that given its historic association with Naish's Farm in West Camel and the potential for designed views across the A303, Parsons Steeple monument should be included in the list of heritage assets.	Parsons Steeple was included in the list of heritage assets to be brought forward for full assessment and it was agreed to be assessed by the SSDC Conservation Officer. This list can be found in in Appendix B, Table B.1 of Appendix 6.1 Cultural Heritage Desk Based Assessment (APP-067), of the Environmental Statement.	<b>AGREED</b>
Cultural Heritage	Baseline and Assessment Methodology	<b>Camel Hill Farm and Outlying Farmsteads</b> The value/sensitivity of Camel Hill Farm and outlying farmsteads is identified as being 'Low', in line with being an undesignated local heritage asset, but could rise to 'Medium' if it were found to be historically associated with the neighbouring Hazlegrove House estate. This would	Areas farmed by Camel Hill Farm have historically been within Hazlegrove House RPG. From research undertaken for the Statement of Significance (APP-068) it appears land owned by the Hazlegrove Estate has been tenanted by owners of Camel Farm. However, there is no evidence of Camel Farm being owned by or directly serving the Estate at Hazlegrove. Therefore, the heritage value of the Camel Hill Farm buildings is not considered to be of higher	<b>AGREED</b>

Topic	Sub-section	South Somerset District Council Comment	Highways England Response	Status
		<p>escalate the significance of effects for the construction impacts.</p> <p>The Council requires the applicant to obtain further information on the association between the Hazlegrove House estate and Camel Hill Farm and outlying historical farmsteads to ensure an adequate understanding of the historical significance of the outlying historic buildings to the Hazlegrove House estate.</p> <p>Any resulting increase in heritage value of these assets should be included in the Cultural Heritage DBA and those with significant effects taken through to the Cultural Heritage ES with appropriate design, mitigation and enhancement measures to be agreed with the District Council.</p>	<p>value than local. This is reflected by the fact they have not been nationally designated. As such The Applicant considers the assessment found in tables 7.2 and 7.3 in Appendix 6.1, Cultural Heritage Desk Based Assessment, of the Environmental Statement (APP-067) reflects the likely effects on the value of the Camel Hill Farm Buildings.</p>	
Cultural Heritage	Baseline and Assessment Methodology – Omission	<p><b>W Sparrow Road Gullies</b> Two 'W SPARROW LTD MARTOCK' stamped cast iron gullies survive at Camel Cross.</p> <p>These undesignated heritage assets should be included in the Cultural Heritage DBA and an appropriate measure of mitigation included in the</p>	<p>It should be noted that one of the cast iron gullies, outside Wayne's Diner and a third found during the accompanied site visit on Plowage Lane, are outside the red line boundary (RLB) and therefore will not be impacted by the scheme. The offering of the gully on the B3151, which will be impacted by the scheme, to a museum or archive has been included in the OHWSI which submitted</p>	<b>AGREED</b>

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		Cultural Heritage ES, such as the careful removal of the gully grates and frames and their accessioning to the museum collections of the South West Heritage Trust or other appropriate local museum, is sought in the DCO.	as part of the Examination at Deadline 6 (REP6-003). A draft of the OHWSI was shared for comment with Historic England HBMCE, SSDC and SCC and comments addressed as appropriate to ensure all parties were in agreement prior to submission.	
Cultural Heritage	Baseline and Assessment Methodology - Omission	<p><b>Pre-Worboys 'Cross Roads' Warning Sign</b> A pre-Worboys 'Cross Roads' highway warning sign survives outside of The Gables in Podimore.</p> <p>This is an undesignated highway heritage asset and should be included for assessment in the Cultural Heritage DBA. Its inclusion on the register of sensitive environmental features in the CEMP under Planning Requirement 3 of the DCO is sought to raise awareness of this vulnerable roadside heritage asset to construction site personnel and avoid accidental damage.</p>	<p>This was not assessed as an individual asset as it would not be physically impacted by the scheme. It forms one of the assets which makes up the Podimore Group. The assessment for this group can be found GR06 in tables 7.2 and 7.3 in Appendix 6.1, Cultural Heritage Desk Based Assessment, of the Environmental Statement (APP-067).</p> <p>The Outline Traffic Management Plan (TMP) was submitted as part of the Deadline 7 submission (REP7-020) and includes mitigation measures to ensure that construction traffic will not be routed past the cross roads sign.</p>	<b>AGREED</b>
Cultural Heritage	Baseline and Assessment Methodology - Omission	<p><b>Hazlegrove Lane</b> The Hazlegrove House RPG Statement of Significance does not cover the remnants of the lost Hazlegrove Lane in the south-east field of the RPG (Peaked Close) and</p>	Highways England consider that the significance of Hazlegrove Lane has been explored in the Hazlegrove House Registered Park and Garden Statement of Significance (APP-068). It is discussed as part of the	<b>NOT AGREED</b>

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		<p>the proposed landscape scheme does not retain the route or extant features of the former Lane.</p> <p>The applicant is required to assess the former route of Hazlegrove Lane in the Hazlegrove House RPG Statement of Significance, DBA and ES.</p> <p>In paragraph 1.7.19 the Applicant states that the significance of Hazlegrove Lane had been considered in section 6.4 of the Hazlegrove House RPG Statement of Significance (APP-068). This amounts to <i>“The 1795 driveway appears to be a north turn off the existing lane which led to Hazlegrove House”</i>.</p> <p>There is no discussion on the function and history of this route, which also demarks the boundary between the parishes of Sparkford and Queen Camel and continues to be defined by the PRoW. The visible alignment and extant features of the lane will be lost under the lower embankment of Bund 7.</p>	<p>assessment of heritage value of the former driveways (see Section 6.4).</p> <p>Features related to this lane and the driveways have been considered within the assessment of Hazlegrove House RPG under GR11 in tables 7.2 and 7.3 in Appendix 6.1 Cultural Heritage Desk Based Assessment (APP-067).</p>	

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		<p>The lack of a proper assessment of Hazlegrove Lane is a notable flaw in the Statement of Significance. However, information on the significance of this historic lane would unlikely alter the design of the proposed scheme.</p>		
Cultural Heritage	Baseline and Assessment Methodology - Omission	<p><b>Hazlegrove Lane</b></p> <p>Retention of the extant features and alignment of the former Hazlegrove Lane is sought in the detailed design scheme approved under Planning Requirement 13 of the DCO and the landscaping scheme approved under Planning Requirement 6 of the DCO.</p> <p>Retention of the PRow on its historic alignment is sought where feasible.</p> <p>There is a gate in the field to the north of the woods that appears to be on the route of the PRow and the location / retention of this should be covered in the design.</p> <p>The Outline Heritage WSI (Version P02 March 2019) identifies archaeological investigation,</p>	<p>Mitigation has been proposed within Table 3.1 Register of Environmental Actions and Commitments in the Outline Environmental Management Plan (OEMP) (APP-148) including protection measures to ensure retained driveway earthworks are protected during construction (CH6) and recording of the earthworks related to the historic driveways, including Hazlegrove Lane (CH10).</p> <p>The field gate has been viewed on site, its interest is in its location, marking the route of Hazlegrove Lane. It is a common type of stock fencing found throughout the country and is therefore of negligible historic interest in its own right. The recording of this gate would be included within the WSI.</p> <p>The recording of the driveways has been included in the OHWSI submitted as part of the Examination at Deadline 6 (REP6-003). A draft of the OHWSI was shared for comment</p>	<b>AGREED</b>



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		<p>mitigation, and recording measures for the following:</p> <p>SMR7 – Strip, map and record for driveways and Hazlegrove Lane within the park and woodland.</p> <p>SMR9 - Strip, map and record for the 19<sup>th</sup> century realignment of Hazlegrove Lane.</p> <p>BH3 – Building recording of the field gate associated with the former Hazlegrove lane.</p> <p>These measures and their aims, as outlined in section 3.1 and 3.3, are supported.</p> <p>The OHWSI does not include an investigation for the abandoned section of Hazlegrove Lane; between the realigned spur (SMR7) and the woodland (SMR9), which remains as a PRoW and parish boundary. The NGR coordinates for either end of this section being 359864, 126093 to 359694, 125896.</p>	<p>with HBMCE, SSDC and SCC prior to submission.</p> <p>The dDCO provides at Requirement 13 that the detailed design will be submitted to the Secretary of State for approval following consultation with the relevant planning authority and local highway authority. Under Requirement 5, details of that consultation (including changes sought and whether they have been made, and where changes have not been made why not), must be submitted along with the application for approval of the detailed design. The Secretary of State will therefore have the views of the Councils before him when making any decision on the detailed design.</p>	

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		This heritage asset should be included for investigation in the OHWSI (for those parts impacted by the works) unless the findings of an earlier trial trench has met the objectives set out in section 3.1.1 relating to Hazlegrove Lane.		
Cultural Heritage	Baseline and Assessment Methodology - Omission	<p><b>Hazlegrove House RPG Coppiced-Banked Track</b></p> <p>The Hazlegrove House RPG Statement of Significance does not cover the coppiced bank and ditch feature on the eastern boundary of the RPG. The feature will be foreshortened by the realignment of the A303 and associated cutting and screen planting works.</p> <p>The Council requires the applicant to assess the bank and ditch feature in the Hazlegrove House RPG Statement of Significance and these features should be taken through to the DBA and ES with appropriate design, mitigation and enhancement measures, to be agreed with the District Council.</p>	<p>The earthwork referred to is linear woodland on the eastern edge of the RPG north of the A303 centered on NGR ST 59955 26187 historic mapping suggests is the 19<sup>th</sup> century realignment of Hazlegrove Lane. A review of lidar data has shown extant features within the woodland along the same route as the realigned path.</p> <p>All earthworks within the RPG have been assessed as part of the Hazlegrove House RPG group (GR11). This assessment can be found in Tables 7.2 and 7.3 in Appendix 6.1, Cultural Heritage Desk Based Assessment (APP-067), of the ES (APP-067). The extent of the earthwork within the red line boundary (RLB) has been included in the OHWSI which will be submitted as part of the Examination at Deadline 5. A draft of the OHWSI will be shared for comment with HBMCE, SSDC and SCC prior to submission.</p>	<b>AGREED</b>
Cultural Heritage	Baseline and Assessment	<p><b>Turnpike Road (MM103)</b></p> <p>The heritage value, magnitude of</p>	Highways England considers that the assessment for the Martock to Sparkford	<b>NOT AGREED</b>

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	Methodology	<p>impact and significance of effects for MM103 (the Martock to Sparkford Turnpike Road) requires reassessment.</p> <p>The Council ask the applicant to reassess heritage asset MM103 with any resulting increase in the significance of effects included in the Cultural Heritage ES with appropriate mitigation measures to be agreed with the District Council.</p> <p>Mitigation might include markers, information points or public art at intervals along the historic alignment of the Turnpike road (where it would no longer form the A303) to retain evidence of its historic route.</p>	<p>Turnpike Road is appropriate. The turnpike road is over 10 miles long. The extent of the route affected by the scheme is around 3 miles. The character and heritage value of the turnpike has been significantly altered with the introduction of modern surfacing and traffic. Although the scheme deviates from the turnpike route in some locations, the route will remain as local roads. As such the overall impact on the full extent of the asset has been assessed as negligible (Chapter 6 Cultural Heritage, APP-043).</p>	
Cultural Heritage	Baseline and Assessment Methodology	<p><b>Canegore Corner Listed Milestone (MM30)</b></p> <p>The magnitude of impact for MM30 is judged to be 'Moderate' despite the listed milestone being permanently removed from its location and its setting and relationship with the A303 being fundamentally altered on its relocation; which has yet to be identified. A greater magnitude of impact is considered appropriate.</p>	<p>Since the submission of Chapter 6 Cultural Heritage of the ES (APP-043) and Appendix 6.1 Cultural Heritage Desk Based Assessment (APP-067) the milestone appears to have been removed. The assessment and mitigation will remain in place in case the milestone is discovered during works.</p> <p>The impact reported is significant. A higher level of impact was considered but</p>	<b>AGREED</b>

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		<p>The Council are seeking the inclusion of MM30 on the register of sensitive environmental features, and full details for its safe removal and storage in the CEMP under Planning Requirement 3 of the DCO.</p> <p>The applicant is required to identify a position for the relocation of MM30, approved by the Secretary of State in consultation with the local planning and highway authorities, in the detailed design scheme approved under Planning Requirement 13 of the DCO.</p>	<p>discounted for the following reasons. The milestone is likely to have been originally associated with the turnpike administered by the Ilchester Turnpike Trust. Its original setting would have been alongside a probably metalled road with limited traffic of carriages, horses, pedestrians and livestock. This historic setting has been replaced by a modern road with significant motorised traffic, especially during the summer months. It is no longer used as a road sign and is a remnant indicating the historic development of the road. As such, other than its roadside setting the original function and setting has been substantially lost.</p> <p>It has been assumed that the milestone is in its original location, its presence is marked on historic mapping in this approximate location and the distances are approximately correct. However, given the age and size of the milestone it potentially could have been moved within the immediate area over its lifetime as the road was widened and altered. It is not unusual for this to happen to milestones and other roadside markers over their lifetime.</p> <p>The milestone is to be relocated not replaced, therefore all historic fabric will be retained.</p>	

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			<p>Prior to removal the milestone will be recorded both as part of the historic record, and to ensure that any damage can be repaired in an appropriate manner. The milestone will still sit road edge on the southern carriageway as close as possible to its existing location. The distances shown will still be approximately correct. The setting will still be a modern road with busy motorised traffic. Therefore, the setting and the ability to understand the heritage value of the milestone will not be substantially changed. The exact position of the milestone will be decided during detailed design as there is the potential for the location of works to change within the limits of deviation, which may affect any agreed location of the milestone.</p> <p>In section 3, Table 3.1, CH5 of the Outline Environmental Master Plan (OEMP) (APP-148) there is an undertaking that the milestone would be recorded, removed, safely stored, restored and reinstated. A methodology for the removal and relocation, including the new position of the milestone, would be prepared. It would then be agreed with the South West Heritage Trust and SSDC. Historic England would also be consulted as the work is considered demolition and reinstatement.</p>	

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			<p>The removal, restoration, storage and reinstatement of the milestone has been included in the OHWSI (REP-6-003) which has been submitted as part of the Examination at Deadline 6. The OHWSI has been shared for comment with HBMCE, SSDC and SCC prior to submission.</p> <p>The dDCO provides at Requirement 13 that the detailed design will be submitted to the Secretary of State for approval following consultation with the relevant planning authority and local highway authority. Under Requirement 5, details of that consultation (including changes sought and whether they have been made, and where changes have not been made why not), must be submitted along with the application for approval of the detailed design. The Secretary of State will therefore have the views of the Councils before him when making any decision on the detailed design.</p>	
Cultural Heritage	Baseline and Assessment Methodology	<p><b>B3151 Listed milestone (MM13)</b> Whilst it is agreed that the magnitude of impact for MM13 is negligible, the milestone is on the edge of the scheme and could be accidentally damaged if it is not identified and</p>	<p>The requirement for protection of the listed milestone on the B3151 has been added to row CH-13 of Table 3.1 in the OEMP (APP-148). A revised draft of the OEMP including this requirement has been submitted as part of the Examination at Deadline 5 (REP5-</p>	<b>AGREED</b>

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		<p>protected (the milestone is heavily covered in ivy and embedded in the hedge).</p> <p>The Council would like MM13 to be included on the register of sensitive environmental features and full details for its protection during the construction works in the CEMP under Planning Requirement 3 of the DCO.</p>	013).	
Cultural Heritage	Baseline and Assessment Methodology	<p><b>Bakery (MM273)</b> The magnitude of impact for asset MM273 is judged to be 'Moderate', a greater magnitude of impact is considered appropriate given that the realignment of the A303 will remove the Bakery's location alongside a main through-route, thus fundamentally alter its relationship with its setting and threaten its historic use.</p> <p>The Council requires the applicant to reconsider the magnitude of impact, with any resulting increase in the significance of effects included in the Cultural Heritage ES with appropriate mitigation measures to be agreed with the District Council.</p>	<p>The moderate effect reported for the bakery is significant. A higher effect was discounted during assessment as the asset itself will remain along with its evidential value. The asset will still have a roadside setting, however it will be a local road rather than a main route. It is acknowledged that this change of setting is significant and there are potential indirect impacts from loss of passing trade. The low value of the asset results in a moderate effect.</p> <p>Mitigation measures were considered during the Environmental Statement process, however suitable mitigation, for example signage, cannot be delivered through the scheme.</p>	<b>AGREED</b>

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Cultural Heritage	Effects on Hazlegrove Registered Park and Garden	<p><b>Assessment of harm</b> In terms of the NPSNN, the assessment of harm from the scheme on the special historic interest of the RPG and on the setting of the listed Hazlegrove House and garden structures should consider the following factors:</p> <ul style="list-style-type: none"> <li>• The loss of parkland, historic driveways, earthworks, copse, boundaries, veteran trees and other features in the southern end of the RPG.</li> <li>• The impact on the character and integrity of the whole RPG.</li> <li>• The impact on the setting of the RPG and its listed structures.</li> <li>• The mitigation measures.</li> <li>• The scale of loss in relation to the whole RPG.</li> <li>• The existing degradation in the southwest of the RPG.</li> <li>• The previous loss and truncation from the construction of the Sparkford bypass.</li> </ul> <p>In the draft SoCG between the Applicant and Historic England (Ref APP-158 and REP4008), the</p>	<p>Through design development the level of harm as defined in the NPPF/NPPG has been reduced from substantial harm to less than substantial harm. However it is recognised EIA terms the scheme still has a significant impact and effect on the RPG. Whilst the introduction of woodland planting along the bunds will help to mitigate the visual impact of the road and traffic from the Park and House once mature, it will not reduce the visual encroachment and physical impact of the scheme on the character and setting of the park.</p>	<b>AGREED</b>



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		<p>Applicant states that: "Through design development the level harm as defined in the NPPF/NPPG has been reduced from substantial harm to less than substantial harm. However it is recognised EIA terms the scheme still has a significant impact and effect on the RPG. Whilst the introduction of woodland planting along the bunds will help to mitigate the visual impact of the road and traffic from the Park and House once mature, it will not reduce the visual encroachment and physical impact of the junction on the character and setting of the park."</p> <p>This position regarding National Planning Policy is accepted by the Council, albeit at the top end of 'less than substantial harm'.</p>		
Cultural Heritage	Effects on Hazlegrove Registered Park and Garden	<p><b>Pond 5</b> Rawlins's Close is a field which retains the majority of its historical boundaries and three veteran parkland trees. It will be affected by the scheme and so mitigation is offered which reinstates the parkland but this is compromised by the inclusion of Pond 5.</p>	<p>Following additional discussions with SSDC in relation to pond 5, a non-material change request was submitted to the Planning Inspectorate in April 2019 (REP6-014) and accepted in to the Examination. In order to address concerns raised, the Applicant has proposed to relocate Pond 5 slightly south and west, further into the corner of the RPG. The Applicant also proposes to realign the maintenance track for Pond 5 to follow the</p>	<b>NOT AGREED</b>

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		<p>The pond is a considerable size and is accompanied by fencing, a maintenance track and other works. Its location in Rawlins's Close would further diminish the area of the historic parkland and introduce an alien feature into the RPG.</p>	<p>western perimeter of the pond, resulting in the eastern perimeter fence of the Pond being moved westwards by approximately 20 metres.</p> <p>Row CH-11 in Table 3.1 of the revised draft of the OEMP submitted at Deadline 5 (REP5-013) requires the landscape proposals developed during detailed design, including planting and fencing, respect the character of the RPG and are agreed with HBMCE and SSDC prior to implementation.</p> <p>The dDCO provides at Requirement 13 that the detailed design will be submitted to the Secretary of State for approval following consultation with the relevant planning authority and local highway authority. Under Requirement 5, details of that consultation (including changes sought and whether they have been made, and where changes have not been made why not), must be submitted along with the application for approval of the detailed design. The Secretary of State will therefore have the views of the Councils before him when making any decision on the detailed design.</p>	
Cultural Heritage	Effects on Hazlegrove	<p><b>Veteran Trees in Rawlins's Close</b> The proposals for the three veteran</p>	Following the non-material change request which has been accepted (REP6-014), the	<b>AGREED</b>

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	Registered Park and Garden	<p>trees is unclear as only one appears on the Environmental Masterplan. Furthermore, this area is proposed as an auxiliary compound and topsoil and materials storage area, but there is no reference to retaining and protecting the veteran trees.</p> <p>The Council requires the retention and protection of the three veteran trees, therefore they should be included on the register of sensitive environmental features in the CEMP under Planning Requirement 3 of the DCO and retained in the landscaping scheme under Planning Requirement 6 of the DCO.</p>	<p>design tweaks (including the realignment of the school access drive) now mean that just 1 veteran tree will be lost as a result of the scheme. Other veteran trees within Rawlin's Close will be retained. Row B1 of Table 3.1 Register of Environmental Actions and Commitments of the Outline Environmental Management Plan (REP7-020) states the following in relation to the veteran tree that will be lost as a result of the scheme: <i>To mitigate the loss of 1 veteran tree, the intact hulk of the veteran tree should be felled and relocated in close proximity to a nearby veteran tree, woodland or parkland area. This will provide an opportunity for those invertebrates and fungi resident within the tree to relocate, provided there is suitable habitat nearby and will ensure that the hulk of the tree continues to provide deadwood resource in the future.</i></p>	
Cultural Heritage	Effects on Hazlegrove Registered Park and Garden	<p><b>Highway Lighting for Hazlegrove Junction</b></p> <p>The blue-white glare of LED highway lights on the Hazlegrove Junction is likely to be intrusive to the southern end of the RPG when the lamps are on.</p> <p>The Council requires the siting of highway lighting columns on the north</p>	<p>The exact specification of luminaires will be determined as part of the detailed design, but consideration will be given to the concern regarding the likely intrusive nature of blue-white glare from LED lighting.</p> <p>The dDCO provides at requirement 16(1) that no part of the authorised development is to commence until a written scheme of the</p>	<b>AGREED</b>

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		side of the roads so far as feasible and the use of lantern shields/hoods to prevent light glare intrusion into the RPG.	proposed highway lighting to be provided for that part of the authorised development has been submitted to and approved in writing by the Secretary of State, following consultation with the relevant planning authority and (in the case of proposed lighting for any highway for which the undertaker is not, or will not be following implementation of article 14(2), the highway authority) the local highway authority.	
Cultural Heritage	Effects on Hazlegrove Registered Park and Garden	<p><b>Bunds 6 and 7</b> Bunds 6 and 7 are not sufficiently high to screen HGVs, signage and lighting columns and will likely affect the character of the RPG.</p> <p>An environmental barrier with planting is proposed to screen the far south-east corner of the RPG. This is an important point in the RPG boundary as it aligns with the outward approach on the Hazlegrove drive. An environmental barrier in this prominent position would diminish the character and appearance of the RPG.</p> <p>The applicant should increase the height of Bund 6 and extend Bund 7,</p>	<p>Landscape cross sections through the bunds have been prepared and were submitted as part of the Deadline 4 submission (REP4-018).</p> <p>Following additional discussions with SSDC in relation to bund 6 and 7, a non-material change request was submitted to the Planning Inspectorate in April 2019. The Applicant investigated the possibility of extending Bund 7 to the east in order to avoid the need for the timber fence alongside the proposed dual carriageway in the south eastern corner of the park. However, this was not possible as it would have compromised proposed drainage outfalls from the carriageway. Instead, it is proposed to provide additional localised screening planting at this location to soften the</p>	<p><b>BUND 6: AGREED</b></p> <p><b>BUND 7: NOT AGREED</b></p>

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		<p>as a substitute to the proposed environmental barrier, in the detailed design scheme approved under Planning Requirement 13 of the DCO and the landscaping scheme approved under Planning Requirement 6 of the DCO.</p>	<p>appearance of the fence.</p> <p>The Applicant notes that SSDC is content with the balance presented by the Applicant for Bund 6, but for Bund 7 SSDC does not believe that the justification for not extending Bund 7 has been demonstrated, does do not believe that the semi-mature planting proposed to screen the environmental barrier would be adequate during leaf fall, and objects to the harmful impact for both sides of the barrier..</p> <p>The dDCO provides at Requirement 13 that the detailed design will be submitted to the Secretary of State for approval following consultation with the relevant planning authority and local highway authority. Under Requirement 5, details of that consultation (including changes sought and whether they have been made, and where changes have not been made why not), must be submitted along with the application for approval of the detailed design. The Secretary of State will therefore have the views of the Councils before him when making any decision on the detailed design.</p>	
Cultural Heritage	Effects on Hazlegrove Registered Park	<p><b>Hazlegrove House RPG Driveway Realignment</b> The realignment does not respond to</p>	Historically, the driveways through the park took the most direct route from the entrance	<b>AGREED</b>

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	and Garden	<p>the landform and proximity of parkland features, such as the retained southern copse. It also passes close to the existing pond and a veteran tree and will require extensive groundworks.</p> <p>The applicant should redesign the new alignment for the Hazlegrove House drive in the detailed design scheme approved under Planning Requirement 13 of the DCO and the landscaping scheme approved under Planning Requirement 6 of the DCO.</p>	<p>to the house. They did not follow topography, and the parkland appears to have been designed around the drives and not the other way around. The route chosen is the most direct to link to the historic 19th century route of the driveway, in the same place as the current access. The first approximately 300 metres of the current access is not historic and was built as part of the construction of the Sparkford bypass.</p> <p>The landscaping design set out in the environmental masterplan (APP-107) is considered to present a sense of arrival which is sympathetic with the historic arrival to the house through the RPG. The proposed journey from the Hazlegrove off slip will initially take the viewer through woodland for approximately 125 metres, emerging into the RPG with woodland on the immediate right-hand side and parkland on the left-hand side for approximately 165 metres. The viewer will then travel through reinstated parkland for approximately 490 metres before joining the 19th route of the driveway. This reflects the pre-19th century arrival through woodland into the parkland proper.</p> <p>Cross sections showing the relationship between the proposed driveway and</p>	

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			<p>landscaping have been submitted as part of the Examination at Deadline 4 (REP4-018).</p> <p>Following additional discussions with SSDC during the Examination, a non-material change request has been submitted to the Planning Inspectorate in April 2019 (REP6-014) and has subsequently been accepted in to the Examination. It is proposed to realign the access to the School by moving it approximately 20 metres northwards, which has the beneficial effect of avoiding the veteran tree in this location. In order to improve the sense of arrival in the RPG the Applicant is also proposing additional planting between the realigned Pond 5 access track and the access track to Hazlegrove School. Additional woodland planting is proposed to be provided to the south west of Pond 5 so that the arrival point into the RPG is an emergence from woodland with views to Hazlegrove House.</p> <p>The dDCO provides at Requirement 13 that the detailed design will be submitted to the Secretary of State for approval following consultation with the relevant planning authority and local highway authority. Under Requirement 5, details of that consultation (including changes sought</p>	

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			<p>and whether they have been made, and where changes have not been made why not), must be submitted along with the application for approval of the detailed design. The Secretary of State will therefore have the views of the Councils before him when making any decision on the detailed design.</p>	
Cultural Heritage	Effects on Hazlegrove Registered Park and Garden	<p><b>Hazlegrove House RPG Restoration And Conservation Management Plans</b></p> <p>The Cultural Heritage ES identifies the design and mitigation measures proposed in response to the adverse effects on the Hazlegrove House RPG. These measures respond to individual issues but do not address the overall harm to the RPG from the permanent loss of approximately 14% of the RPG and further encroachment of the A303.</p> <p>Part of the mitigation includes for the reinstatement of parkland grazed grass land and specimen tree planting in the area which is currently arable farmland. However, the DCO does not include a historic landscape conservation management plan for</p>	<p>If a Conservation Management Plan is prepared as part of the DCO it will only be able to address works which directly mitigate the scheme, rather than be a holistic document which allows for the long-term management of the complete RPG.</p> <p>Within row CH12 of Table 3.1 in the revised draft of the OEMP the following provisions have been put in place;</p> <p><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 agreed with SSDC, The Gardens Trust and Historic England prior to undertaking any landscape</i></p>	<b>NOT AGREED</b>



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		<p>this area or the remainder of the RPG. A conservation management plan for the whole RPG would help mitigate the permanent harm to the RPG. The Council requires a planning requirement in the DCO for the preparation and implementation of a conservation management plan for the RPG approved by Secretary of State in consultation with the local planning authority.</p>	<p><i>works within the RPG.”</i></p> <p>Highways England, as landowner, recognises the need to properly manage its assets and has committed to undertake a Conservation Management Plan for the RPG in its capacity as landowner, but this is not included within the DCO. This will enable the whole of the RPG to be included within the Conservation Management Plan rather than only the work which will result in direct mitigation for the scheme. Highways England has prepared a memorandum of understanding and shared this with SSDC, demonstrating their commitment to undertaking a Conservation Management Plan.</p>	
Cultural Heritage	Mitigation	<p><b>Impact of Potential Traffic Calming on the Conservation Area</b> The Council is concerned about increased traffic on local roads including Sparkford High Street and West Camel. There is no reference in the Cultural Heritage DBA operational impact schedule of the potential increase in traffic passing through these villages and local Conservation Areas or by roadside Listed Buildings.</p> <p>Whilst an increase in vehicle flow can generate its own potential impacts,</p>	<p>No traffic calming measures are proposed in Sparkford or West Camel as part of the scheme.</p>	<b>AGREED</b>

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		<p>any proposed mitigation by way of an introduction of traffic calming measures in response to increased vehicle flow can also bring about an adverse impact on the character and appearance of a Conservation Area and setting of a Listed Building/s, i.e. highway lighting, signage, lining, bollards and build-out.</p> <p>The Council requires clarification as to where traffic modelling for the scheme indicates an increase in traffic flow and HGV traffic as a direct outcome of the scheme. The applicant should then identify the impacts of increased traffic, associated traffic calming measures and increased traffic-induced vibration on heritage assets and include an appropriate measure of mitigation in the Cultural Heritage ES.</p> <p>Inclusion of any associated traffic calming measures should be secured in the detailed design scheme under Planning Requirement 13 of the DCO.</p>		
Cultural Heritage	Mitigation	<p><b>Howell Hill Stone Boundary Wall</b> A Camel Stone boundary wall exists on the east side of Howell Hill. This is</p>	The northern 50 metres of the wall will be removed to make way for the permanent works. However it will be possible to set the	<b>NOT AGREED</b>

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		<p>a locally distinctive feature of heritage and landscape value.</p> <p>The boundary wall should be retained through either its repair or retention on its current alignment or its rebuilding on the alignment of the revised boundary to the Howell Hill carriageway.</p> <p>There is no reason for any of the wall to be lost. The top of Howell Hill will be realigned to form a gentle bend, allowing for sufficient length to rebuild the full length of the wall on the new boundary of the highway, replacing the proposed fence.</p> <p>This point was discussed at the SSDC / Highways England meeting in Yeovil on 28<sup>th</sup> March 2019.</p>	<p>stone aside for reuse elsewhere on the scheme. This action has been included in the Outline Environmental Management Plan submitted as part of Deadline 5 (REP5-013). The middle 35 metres section will need to be removed temporarily to make way for the earthworks haulage route. The wall will be reinstated along its existing line following completion of the earthworks. The southern 25 metres section will be retained in situ. The extent that is to be removed has been identified in the Outline Heritage Written Scheme of Investigation for a level 2 building recording prior to demolition (REP6-003).</p>	
Landscape	Baseline and Assessment Methodology	<p>The methodology for establishing the landscape and visual baseline in the ES is comprehensive and clearly sets out the study area, designated sites, landscape character and its sensitivity to change, and the visual baseline and its sensitivity to change. The assessment has been undertaken in accordance with the DMRB, Interim</p>	<p>No response needed.</p>	<b>AGREED</b>

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		Advice Note 135/10 Landscape and Visual Effects Assessments (replacing parts of the DMRB) and the Landscape Institute Guidelines for Landscape & Visual Impact Assessments. The DMRB is the accepted methodology for infrastructure projects and the Landscape Institute guidance is a long-established industry tool.		
Landscape	Baseline and Assessment Methodology	Key viewpoints being used to inform the LVIA were agreed in advance by the District Council.	The Applicant's Landscape Architect agreed the key viewpoint locations with the SSDC Landscape Architect prior to producing the Landscape and Visual Impact Assessment (LVIA) chapter of the Environmental Statement.	<b>AGREED</b>
Landscape	Design and mitigation measures	<b>Visual Receptors Nos. 14 and 17 (Green track of Slate Lane)</b>  The scheme will bring the Steart Hill Link and Downhead Junction Link roads in close proximity to Slate Lane and introduce an extensive belt of screen planting in the foreground. This linear belt of planting will not only screen the realigned A303 and its link roads but also remove all opportunities to appreciate the long	A review of visual receptor nos. 14 and 17 has been undertaken and is documented within Appendix E of the Deadline 4 Supporting Information (REP4-018). The assessment conclusions for visual receptors 14 and 17 remain the same. In reviewing this viewpoint in winter, it is considered that arable land would remain in the immediate foreground of the view. Mitigation planting will then be visible in the middle ground of the view. In Year 1, this would provide limited screening of the road. By Year 15, while the	<b>AGREED</b>

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		<p>distance views of the vast undulating landscape to the south. This permanent effect is not assessed in the impact schedules.</p> <p>For VR No. 14 there is no assessment on the effects on the vast, long distance view for the 15-year period once the extensive screen planting is established.</p> <p>For VR No. 17 there is no assessment of the long distance views during operation.</p> <p>The Council requires the reassessment of VR No. 14 and VR No. 17 with an assessment of the effects from the loss of the vast, long distance view for the 15-year period.</p> <p>The inclusion of measures for retaining long distance panoramic views from Slate Lane in the detailed design scheme approved under Planning Requirement 13 of the DCO and the landscaping scheme approved under Planning Requirement 6 of the DCO are sought.</p>	<p>planting would provide visual screening of the road and moving traffic, given its relatively close proximity to the viewpoint, and the scale of the planting, it is expected that the long views to the distant ridgeline would become obscured. This is likely to be the case in both summer and winter views. However, it is noted that for the majority of the length of PROW Y 27/20 in this part of Slate Lane, including in winter, the view is enclosed by the lane-side vegetation, and a receptor can only gain panoramic views as represented by the photographs where gaps are created to enable access to the fields. The impacts assessed therefore apply principally to these gaps, and not necessarily to the whole experience for receptors using this PROW.</p>	

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		<p>The review of the visual receptors in Appendix E of the Applicant's Deadline 4 Supporting Information (REP4-018) acknowledges the loss of the long distance views from VR Nos. 14 and 17. Whilst the gaps are few and intermittent, the stunning views they afford are, thus, all the more dramatic. They share a relationship with the otherwise enclosed nature of PRow and are the outstanding element of the experience. It is at these locations that receptors are likely to pause or rest. The assessment of the effects on the visual receptors is considered to overlook this aspect.</p>		
Landscape	Design and mitigation measures	<p>Implementation The Applicant is known to be supportive of retaining glimpses of the panoramic views, and its response offers a potential means to achieve this.</p> <p>However, during brief discussions on this matter as part of the Bristol and Yeovil meetings (22nd and 28th March 2019) it was acknowledged that maintaining the long distance</p>	<p>Row L5 Table 3.1 Register of Environmental Actions and Commitments in the Outline Environmental Management Plan (REP5-013) now contains the following commitment: <i>"A review of the landscape design as part of the environmental masterplan to be undertaken to ensure the retention of long-distance views from the PRow along Slate Lane looking south. It will be important to ensure that these long-distance views are designed whilst still ensuring that the landscape screening of views to the</i></p>	<b>AGREED</b>

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		<p>views would be in conflict with screening the scheme.</p> <p>On further consideration, the Council notes that at this point the dualled carriageway would be in a cutting and this might allow for the belt of extensive screen planting between the cutting and Slate Lane to be redesigned (in terms of its extent and species mix for lower plant height) to maintain a gap in the planting without compromising the landscaping and screening of the A303.</p> <p>A reconsideration of the planting in this area is requested as part of the outline plan in order to establish this principle for the detailed design stage.</p>	<p><i>proposed Downhead Junction are retained. Consultation with South Somerset District Council's Landscape Architect to be undertaken as part of the detailed design when retaining these long-distance views is required".</i></p>	
Landscape	Design and mitigation measures	<p><b>Visual Receptor No. 25</b></p> <p>The assessment of the effect on VR No. 25 is challenged as the boundary hedge to the A303 is visible on the horizon, as are HGVs and vans above the hedgerow.</p> <p>The applicant should reassess VR No. 25 and include measures for enhanced screening of the A303 from Wales in the detailed design scheme</p>	<p>A review of visual receptor no. 25 has been undertaken and is documented within Appendix E of the Deadline 4 Supporting Information (REP4-018). Amendments have been made to both the construction and operational effects, with effects during construction anticipated to be Slight Adverse (previously assessed as Slight Adverse), and during operation Neutral during winter months (previously assessed as Neutral), and Slight Beneficial during the summer</p>	<b>AGREED</b>

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		approved under Planning Requirement 13 of the DCO and the landscaping scheme approved under Planning Requirement 6 of the DCO.	months at Year 15 (previously assessed as Neutral).	
Landscape	Design and mitigation measures	<p><b>Visual Receptor No. 27 and 28</b> The assessment of VR No.28 does not consider the harmful effect of an environmental barrier on the rural character of the farmstead setting.</p> <p>The applicant is asked to reassess VR No. 28 with consideration of the effects of an environmental barrier on the rural character and the inclusion of a bund instead of an environmental barrier in the detailed design scheme approved under Planning Requirement 13 of the DCO and the landscaping scheme approved under Planning Requirement 6 of the DCO.</p> <p>The review of the visual receptors in Appendix E of the Applicant's Deadline 4 Supporting Information (REP4-018) notes that the east end of the barrier will be visible from VR 28 until planting is established.</p> <p>Visual Receptor No. 27 and 28 are representative for the area. The</p>	<p>Row L5 Table 3.1 Register of Environmental Actions and Commitments in the Outline Environmental Management Plan (REP5-013) now contains the following commitment: "Investigate other means of screening the proposed A303 from Camel Hill farm that would be more in keeping with the rural character, such as a stone-faced bund. Consultation with South Somerset District Council's Landscape Architect to be undertaken as part of the detailed design when designing the visual screening in this location".</p>	<b>AGREED</b>



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		<p>presence of the barrier will impact on the perception of the rural character even if not always in view from these and other points. The Applicant acknowledges the unsuitability of environmental barriers to rural locations in its response to ExA's Q1 1.1.32: <i>"Any additional barriers, such as fencing, will have an additional impact on setting as they will not reflect the rural character of the property"</i>.</p> <p>The Applicant's conviction that planting can effectively screen the barrier is not shared.</p> <p>The purpose of the barrier is supported. However, other means of screening that would be more in keeping with the rural character should be investigated, such as a stone-faced bund.</p> <p>The negative impact of a barrier on the rural character is not only important when experienced from the vicinity of Camel Hill Farm, but also for the perception of the area with travellers on the A303.</p>		

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Landscape	Design and mitigation measures	<p><b>Visual Receptor No. 38</b> The assessment of the effects on VR No. 38 are challenged as it does not consider the adverse effect of an environmental barrier on the character of the RPG.</p> <p>The applicant is required to reassess VR No. 38 and extend Bund 7, as a substitute for the proposed environmental barrier, in the detailed design scheme approved under Planning Requirement 13 of the DCO and the landscaping scheme approved under Planning Requirement 6 of the DCO.</p> <p>The review of the visual receptor in Appendix E of the Applicant's Deadline 4 Supporting Information (REP4-018) notes that the environmental barrier would be visible in the short and medium term, but screened by Year 15. Additional planting is proposed for the early years subject to the position of highway elements.</p> <p>The effectiveness of the screen planting for all years is challenged</p>	<p>The presence of the proposed fencing is mentioned in the assessment (see the Visual Baseline and Impact Schedules, APP-072). Proposed planting will screen this over time, and as such the fencing is only anticipated to be visible in early years.</p> <p>A review of visual receptor no. 38 has been undertaken and is documented within Appendix E of the Deadline 4 Supporting Information (REP4-018). The assessment conclusions for visual receptor 38 remains the same.</p> <p>The dDCO provides at Requirement 13 that the detailed design will be submitted to the Secretary of State for approval following consultation with the relevant planning authority and local highway authority. Under Requirement 5, details of that consultation (including changes sought and whether they have been made, and where changes have not been made why not), must be submitted along with the application for approval of the detailed design. The Secretary of State will therefore have the views of the Councils before him when making any decision on the detailed design.</p>	<b>NOT AGREED</b>

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		<p>due to the narrow width of planting available in this area and the considerable gap in the planting from the drainage channels. What screen planting can be included would have a minimal impact during leaf fall for six months of the year. This is evident from established planting along the existing A303 in this area.</p> <p>The revised assessment of the effects on the visual receptors is therefore challenged as the barrier is considered to remain a visible feature. The Applicant acknowledges the unsuitability of environmental barriers to rural locations in its response to ExA's Q1.1.32: <i>"Any additional barriers, such as fencing, will have an additional impact on setting as they will not reflect the rural character of the property"</i>. They are equally harmful for the special character of the RPG.</p> <p>The negative impact of a barrier on the rural character is not only important when experienced from the Hazlegrove Park but also for the perception of the area with travellers</p>		

Topic	Sub-section	South Somerset District Council Comment	Highways England Response	Status
		on the A303.		
Landscape	Design and mitigation measures	<p><b>Visual Receptor No. 38 - Implementation</b></p> <p>For the reasons stated above, the proposed mitigation measures are not considered effective. The Council considers that appropriate measures would be to relocate the drainage ditches and culverts to the east and to extend Bund 7 to the east, thus removing the need for the environmental barrier.</p> <p>The views of the Council were shared at the Bristol meetings on 22<sup>nd</sup> March 2019, with a helpful response from the Applicant to look at redesigning this area as part of the outline plan.</p>	<p>Following additional discussions with SSDC in relation to bund 6 and 7, a non-material change request was submitted to the Planning Inspectorate in April. The Applicant investigated the possibility of extending Bund 7 to the east in order to avoid the need for the timber fence alongside the proposed dual carriageway in the south eastern corner of the park. However, this was not possible as it would have compromised proposed drainage outfalls from the carriageway. Instead, it is proposed to provide additional localised screening planting at this location to soften the appearance of the fence; this is detailed on the updated Environmental Masterplan (REP7-030).</p>	<b>NOT AGREED</b>
Landscape	Design and mitigation measures	<p><b>Design of Highway and Landscape Elements</b></p> <p>There is no detail for the design and materials for the highway and landscape features are required, i.e. the acoustic barriers, fences, gates, access road and track surfaces.</p> <p>The Council requires the inclusion of details for hard landscaping works in the landscaping scheme approved under Planning Requirement 6 of the</p>	<p>A review of the materials required will be undertaken and details provided to SSDC as appropriate. Full details would not be available until the detailed design stage of the scheme commences. The landscape requirements within the dDCO have been amended to be more prescriptive.</p>	<b>AGREED</b>

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		DCO.		
Landscape	Design and mitigation measures	<p><b>Bridge Designs</b> The proposed overbridge and underbridge for the scheme vary in form from the existing bridges on this section of the A303 by being supported on abutments rather than slender piers. This introduces a new form of bridge design with substantial elements of concrete facing panels.</p> <p>Due to the prominence of these features in the landscape and association with the character of the district with travellers on the A303, the Council seeks greater assurance that these features will be constructed to appropriate design.</p> <p>This could be achieved with a new Requirement for the bridges with an agreed background documents establishing the parameters for the bridge designs.</p>	This is considered to be a detailed design aspect and so would not be undertaken as part of the DCO for this scheme.	<b>NOT AGREED</b>
Biodiversity	Habitat Loss	SSDC sought the Defra Metric and Somerset's Habitat Evaluation Procedure to be applied to the scheme.	<p><u>Calculations of habitat losses / gains</u> Natural England agreed in February 2018 that the Defra Metric was not necessary for the scheme in planning terms. However, following comments from SSDC, the metric was completed in February 2019 in order to</p>	<b>AGREED</b>

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			<p>quantify the habitat losses/ gains as a result of the scheme. This quantification only represents information already included within the DCO application. This quantification was submitted as part of Deadline 4 of the DCO.</p> <p>As agreed with SSDC on 16 January 2019, the project team are not required to carry out the Somerset's Habitat Evaluation Procedure.</p>	
Biodiversity	Habitat Loss	<p><b>Evidence of sufficient biodiversity mitigation / enhancement being provided</b></p> <p>It is considered that the applicant has provided insufficient evidence to show that the scheme would not result in a net loss of habitat value.</p> <p>The Council would like the applicant to use Defra's Biodiversity offsetting metric or Somerset's Habitats Evaluation Procedure to calculate the equivalent amount of habitat needed to replace that lost during construction. This would give confidence that the landscaping associated with the proposed road scheme provides sufficient mitigation. Where mitigation is insufficient the</p>	<p>Natural England agreed in February 2018 that the Defra Metric was not necessary for the scheme in planning terms. However, following comments from SSDC, the metric was completed in February 2019 in order to quantify the habitat losses/ gains as a result of the scheme. This quantification only represents information already included within the DCO application. This quantification was submitted as part of Deadline 4 of the DCO.</p> <p>As agreed with SSDC on 16 January 2019, the project team are not required to carry out the Somerset's Habitat Evaluation Procedure.</p>	<b>AGREED</b>

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		<p>appropriate amount and type should be added to the scheme either on or off site. Furthermore, the scheme should show a resultant enhancement for biodiversity including through habitat creation. The Environmental Statement should be updated accordingly and reviewed by the District Council to ensure it is content with the net habitat gain.</p>		
Biodiversity	Habitat Loss - trees	<p>The Council considers that insufficient tree replanting is proposed, at least three trees should be replanted for each tree lost to achieve net gain and to account for natural losses. This should be amended by the applicant and specified in an updated landscape strategy/plan approved under Planning Requirement 6 of the DCO.</p>	<p><u>Trees</u></p> <p>It is proposed that the following measures will be taken to mitigate the loss of mature and veteran trees (as well as tree planting mentioned in the section above): intact hulk of the veteran tree should be felled and relocated in close proximity to a nearby veteran tree, woodland or parkland area. This will provide an opportunity for those invertebrates and fungi resident within the tree to relocate, provided there is suitable habitat nearby and will ensure that the hulk of the tree continues to provide significant deadwood resource in the future.</p> <p>In terms of tree planting, we will be planting a</p>	<b>AGREED</b>

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			<p>greater number than we are losing, but exact figures for tree numbers will be confirmed during detailed design. The net gain in tree planting is demonstrated within the relevant sections of table provided to SSDC (in advance on the DEFRA metric being completed), which shows:</p> <ul style="list-style-type: none"> <li>• 0.8 hectares loss of broadleaved parkland scattered trees (loss of 14 individual trees)</li> <li>• 2.2 hectares net gain in woodland habitat</li> <li>• 20.25 hectares linear belt of trees and shrubs to be planted</li> <li>• Planting of 51 individual trees.</li> </ul>	
Biodiversity	Habitat Loss - trees	The loss of trees, including veteran trees and hedges is particularly concerning. The replanting and replacement of mature trees on a 1 for 1 basis is insufficient and new planting should be on a 3 for 1 basis which would allow for natural losses. An appropriate ecological management plan will need to be in place to ensure that all the re-created habitats are	The largest block of woodland to be lost (1.33 hectares) is south of Hazlegrove House. This woodland is poorly structured with limited understorey and a species composition not indicative of ancient woodland. Other small areas of broadleaved semi-natural woodland and plantation woodland will be lost but the structure / species composition did not indicate ancient woodland. There will be a substantial net gain of woodland habitat as a result of the scheme (2.2 hectares). Refer to Table 8.10 within Chapter 8 Biodiversity	<b>AGREED</b>



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		<p>managed to the intended habitat and for the duration of the scheme.</p> <p>The District Council understands that the exact number of trees proposed is a detailed design matter which will be addressed through the CEMP and other associated management plans.</p> <p>The Environmental Statement will need to be updated and the District Council will need to review its contents to ensure it is content.</p>	<p>(APP-045) of the ES for details of priority habitat replacement and compensation as a result of the scheme.</p> <p>There is a net loss of hedgerow length of 91.91 metres. However, 30% of hedgerow to be lost comprises defunct and species poor hedgerows and habitat planting will comprise species rich hedgerows. The DEFRA metric demonstrates that hedgerow biodiversity units will remain largely the same and therefore net loss of hedgerow is negligible. Refer to Table 8.10 within Chapter 8 Biodiversity (APP-045) of the ES for details of priority habitat replacement and compensation as a result of the scheme.</p> <p>An ecological management plan will be produced for the scheme.</p> <p>Refer to the section above for measures proposed to mitigate the loss of trees. These mitigation measures are also detailed within Row L3 of Table 3.1 REAC in the Outline Environmental Management Plan (APP-148)</p>	
Biodiversity	Bats	<p><b>Effects on bats and their foraging habitats</b></p> <p>There is insufficient survey work and the analysis of the survey work that has been undertaken lacks detail.</p> <p>The proposed mitigation is insufficient</p>	<p><u>Bat survey effort</u></p> <p>Considerable bat survey effort has been completed at the site, which was agreed with Natural England, and includes the following:</p>	<b>AGREED</b>

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		<p>and requires further consideration following additional surveying.</p> <p>The applicant is required to clarify the results of the survey work in the Environmental Statement to provide a clearer picture of where and what each species is doing along the route of the proposed dualling. The impacts on each species' local population should then be considered and analysed and mitigation measures provided accordingly.</p> <p>Further bat activity surveys of woodland affected by the proposed scheme need to be carried out, reported and analysed in an updated Environmental Statement and mitigation proposed accordingly.</p> <p>The value of the habitat area lost should be calculated using either Somerset's Habitat Evaluation Procedure or Defra's Biodiversity offsetting metric and mitigation provided accordingly.</p> <p>The Applicant has presented heat</p>	<ul style="list-style-type: none"> <li>• Bat roost assessments and further nocturnal emergence / return surveys (where necessary) of buildings within 250 metres of the scheme.</li> <li>• Bat roosts assessments followed by climb and inspect surveys and nocturnal emergence / return surveys (where necessary) of trees within 250 metres of the scheme.</li> <li>• Bat activity surveys along the scheme extent.</li> <li>• Deployment of static bat detectors at 18 locations along the extent of the scheme.</li> <li>• Crossing point surveys of linear features to be bisected by the proposals (12 locations in total).</li> <li>• Hibernation surveys of potentially suitable sites within 250 metres of the scheme.</li> </ul> <p><u>Analysis of bat survey data</u></p> <p>Heat maps have been produced to reflect bat activity at the site. A detailed account of the bat activity recorded on each survey has been provided within the bat survey report, detailing movements of different species during surveys, with recordings of key species highlighted. A summary of this information has also been provided. Heat</p>	

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		<p>maps showing distribution of bats per species on 20 February 2019.</p>	<p>maps showing distribution of bats per species were presented to the SSDC biodiversity officer at a meeting held on the 20 February 2019. These maps did not highlight any areas of concern regarding species distribution in the context of the scheme and the mitigation measures detailed within the ES remain valid (Section 8.6 of Chapter 8 Biodiversity, APP-045). These mitigation measures are also detailed within Row B3 of Table 3.1 REAC in the Outline Environmental Management Plan (APP-148).</p> <p>The bat surveys that took place in summer 2018 were part of the landscape-scale bat transect surveys that were not related to the Phase 2 protected species surveys, and were been requested by Natural England. These were completed in accordance with relevant guidance.<sup>1</sup> The results were not needed to inform the ecological assessment and subsequent environmental mitigation strategy, for the Development Consent Order application.</p> <p><u>Bechstein's bats</u></p> <p>It was agreed with Natural England that these were not required as no historic records of</p>	

<sup>1</sup> Berthinussen A & Altringham J (2015) WC1060 *Development of a Cost-Effective Method for Monitoring the Effectiveness of Mitigation for Bats Crossing Linear Transport Infrastructure*. Defra.

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			<p>Bechstein's were returned, no evidence of Bechstein's roosts across any of the surveys was identified, and the only Special Area of Conservation (SAC) designated for Bechstein's was over 17 kilometres away from the scheme and would not be affected. Any Bechstein's associated with the SAC are highly unlikely to be present in proximity to the scheme. In addition, there are only a few small blocks of woodland within the surrounding landscape and therefore the likelihood of Bechstein's being present in this area is assessed as being low. The only woodland undergoing habitat clearance is that at Hazlegrove school, with no trees within this woodland block assessed as requiring further bat surveys due to their age and lack of potential roosting features.</p> <p><u>Woodland surveys</u></p> <p>The transect route went through Annis Hill Wood (north-west of Downhead Manor Farm) as there were distinct footpaths and open areas, which meant that surveyors would be able to get better recordings of bat calls (as dense vegetation causes calls to become distorted) and could also observe the behaviour of the bats, even in the darker periods of the transect. There were no other woodland areas within the survey areas</p>	

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			<p>where this was feasible. The transects were instead designed to follow the woodland edges, such as at Pepper Hill Copse and at Hazlegrove school. A transect also ran south of Rewber Brake which was at the edge of the survey area. Access was not permitted to Steart Wood or Pen Hill Copse to complete surveys; however, the transects ran along the edge of these woodland areas. Trees within woodland areas were generally young or semi-mature with no mature specimens present. No trees supporting roosting bats are proposed to be felled within woodland areas.</p>	
Biodiversity	Bats	<p><b>Loss and fragmentation of habitat connectivity for bats</b> Ten bat species were recorded during the crossing point surveys undertaken by the applicant between July and October 2017. Numerous important commuting corridors were also identified, mainly to the north of the existing A303, with more limited numbers south of the existing road, including a potential important crossing point south of Steart Wood, approximately 220 metres west of</p>	<p><u>Crossing point survey methodology</u> The relevant guidelines<sup>2</sup> only require the use of thermal or night vision equipment for surveys of underpasses due to the dark conditions in these locations. Although the benefits of their use are highlighted within the guidelines, they are not a standard requirement. The crossing point surveys were completed in accordance with the guidelines and as such are considered sufficiently robust to inform the impact assessment. The guidelines require surveys to be completed between June and August. Crossing point</p>	<b>AGREED</b>

<sup>2</sup> Berthinussen A & Altringham J (2015) WC1060 *Development of a Cost-Effective Method for Monitoring the Effectiveness of Mitigation for Bats Crossing Linear Transport Infrastructure*. Defra.

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		<p>Conegore Corner.</p> <p>Mitigation is proposed by the applicant but the proposals are not considered to be effective mitigation for bats crossing the operational A303 and will lead to increased bat mortality rates.</p> <p>The surveying undertaken to inform the Environmental Statement and the proposed mitigation for the scheme is considered insufficient to determine bats crossing the existing A303 – surveys do not take account of the seasonal variation in prey availability and habitat use by some species of bats and no thermal imaging cameras of potential crossing points were deployed in the surveys as included in the Berthinussen and Altringham (2015) methodology.</p> <p>The applicant is required to undertake further surveys for a full season and with thermal imaging cameras is required to determine how the existing</p>	<p>surveys were completed between July and September 2017. The timings for the surveys were considered appropriate based on the southerly location of the scheme as well as the potential for hibernation, transition, and swarming sites within the surrounding landscape.</p> <p>Bat activity transects were completed across the full survey season, as per Bat Conservation Trust (BCT) guidelines and therefore any changes in bat activity reflecting seasonal variation in prey availability would be recorded during these surveys.</p> <p><u>Bat mitigation</u></p> <p>The projected night-time traffic flows due to the scheme are not predicted to increase substantially (from the Do-Minimum scenario).</p> <p>Bats are already recorded crossing the road at the location 220 metres east of Canegore Corner. The hedgerow is currently bisected by the existing A303 (17 metre gap). It is considered that, based on the predicted traffic flows, bat mortalities as a result of traffic collisions are not anticipated to increase significantly.</p>	

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		<p>A303 is being crossed by bats. This should then be included in an updated Environmental Statement.</p> <p>A 'green bridge' should be considered at Canegore Corner (see Berthinussen and Altringham, 2015) alongside the underpasses (which should be of appropriate dimensions) which are being provided as part of the proposed scheme. These mitigation measures need to be identified, designed and included in construction drawings.</p>	<p>Bat Conservation Trust Guidance<sup>3</sup> indicates that bat hop overs are appropriate mitigation for a range of species. A bat hop-over has been proposed at Canegore Corner. Chapter 8 Biodiversity of the Environmental Statement (APP-045) states that this hop over will be formed of more permanent planting, designed into the soft landscaping strategy, ensuring that the height of the hop over builds gradually to encourage bats to fly up and over the A303. In addition to this, a dense shrub layer should be planted along the verge to discourage bats from crossing the road low down, forcing them up and over the road, away from traffic. The presence of bat species known to fly through vegetation such as brown long-eared bat, greater horseshoe bat, lesser horseshoe bat, means that wooden screen / mesh is also proposed to be installed alongside the dense shrub. Following consultation with the SSDC biodiversity officer, additional measures to consider in developing the detailed design for the scheme at this location will include planting to encourage bats to use the nearby underbridge (located to the west) and potentially illuminated bollards to be installed in the verge to deter species such as lesser</p>	

<sup>3</sup>[https://cdn.bats.org.uk/pdf/Our%20Work/Landscape\\_and\\_urban\\_design\\_for\\_bats\\_and\\_biodiversityweb.pdf?mtime=20181101151349](https://cdn.bats.org.uk/pdf/Our%20Work/Landscape_and_urban_design_for_bats_and_biodiversityweb.pdf?mtime=20181101151349)

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			<p>horseshoe bats crossing the road. SSDC will be consulted on the detailed design process.</p> <p>These mitigation measures are detailed within Row B3 of Table 3.1 REAC in the Outline Environmental Management Plan (APP-148)</p>	
Biodiversity	Bats	<p><b>Bat roost provision</b> As a result of the proposed scheme there will be a loss of roosts for bats including one house that would be demolished by the construction of the proposed road. The applicant recommends a replacement bat house and a minimum of 220 bat boxes are installed within suitable habitats adjacent to the scheme.</p> <p>It is not certain where the figure for bat boxes comes from or which bat populations would benefit from this seemingly a 'scatter gun' approach to provision.</p> <p>The applicant is required to carry out further analysis as to roosting requirements of bats and consideration of provision for horseshoe species. Bat houses should be considered in place of</p>	<p>The proposed bat boxes are an enhancement and will offset a number of trees with bat roosting potential that will be lost as a result of the scheme (although no trees with confirmed bat roosts will be removed). The scheme is over 90 hectares in area, and so bat boxes will be spread out throughout this area. A range of bat boxes will be used, to provide roosting opportunities for a range of species, including barbastelles; Myotis bats; noctules; long eared bats and pipistrelles, ensuring that no particular species will be favoured through these enhancements. The locations of bat boxes will be confirmed during detailed design. Their locations will take consideration of public access and land ownership in order to minimise the potential for them to be disturbed in the future. There are currently no plans to monitor these boxes.</p> <p>A bat house is also proposed as part of the scheme, potentially to be located within the wildlife area close to the Sparkford Junction.</p>	<b>AGREED</b>



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		<p>boxes and the pole mounted house, which is likely to be a better long-term investment.</p> <p>SSDC's Ecologist now agrees with the focused bat box approach.</p>	<p>The exact location will be confirmed during detailed design.</p> <p>In terms of impacts of the proposed scheme on bat roosts, 1 residential property with evidence of bats is proposed to be demolished. It was found to have 2 old pipistrelle droppings which indicated historic use by a very low number/individual bat. The 2017 emergence surveys found no evidence of current use. Based on the very limited historic evidence found and the negative emergence/re-entry surveys, it is not considered that the construction of a standalone bat house (in addition to the bat boxes and pole mounted bat house proposed) is proportionate mitigation for the loss of this roost.</p> <p>However, following discussions with SSDC, it has been agreed to reduce the number of bat boxes proposed as part of the scheme from 220 to around 60, with the precise number to be confirmed at detailed design. This will reduce the risk of encouraging pipistrelle species into the area, which would potentially out-compete rarer bat species such as lesser and greater horseshoe bats, which would not use bat boxes.</p> <p>These mitigation measures are detailed</p>	

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			within Row B3 of Table 3.1 REAC in the Outline Environmental Management Plan (APP-148).	
Biodiversity	Bats	<p><b>Disturbance to bat species whilst occupying a place of rest</b> A number of trees and buildings have been identified in the Environmental Statement as being of varying potential to support roosting bats.</p> <p>The report recommends that to reduce any impact from increased levels of disturbance from light, noise and vibration throughout construction and during operation of the scheme, a 10-metre buffer zone is observed around hedgerows and woodland, and where bat roosts have been identified. No evidence is given for these buffered distances and it is considered that the effects of disturbance from road construction on roosting bats can occur up to 200m away.</p>	<p>The 10 metre buffer proposed within the ES chapter is based on professional judgement and experience and it is considered that typical construction works associated with the scheme within this buffer could cause significant disturbance which could lead to the abandonment or decline of the roost site. However, it is acknowledged that the 10 metre buffer to mitigate disturbance is not referenced within any publications/literature. Therefore, it is proposed that the buffer zones around confirmed roost sites are extended to 15 metres where possible, which is in line with Natural England Standing Advice for Ancient Woodland<sup>4</sup>. This buffer can be maintained for all roosts with the exception of:</p> <ul style="list-style-type: none"> <li>• WS56543: Inactive day roost for brown long-eared bats. Works are currently proposed within 8 metres. Pre-commencement bat surveys will be undertaken and if the bat roost has become active again, appropriate mitigation measures will be put in place.</li> </ul>	<b>AGREED</b>

<sup>4</sup> <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

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		<p>The applicant is required to undertake a revised assessment of the potential disturbance to bat roosts which based on evidence and how this would be mitigated for in the construction programme should be included in an updated Environmental Statement.</p> <p>A condition should be included in the Construction Environmental Management Plan (CEMP) which would implement working methods to prevent disturbance to roosting bats during the construction process.</p> <p>The applicant has undertaken additional work and the ecologist is now only concerned about one roost of myotis species which are outside the red line boundary on the southern side of the A303, which is likely to be sensitive to disturbance at up to 200m. Until the area to which Article 5(2) is confirmed this is relevant. The ES needs to be updated and reviewed.</p>	<ul style="list-style-type: none"> <li>• ST106774: Active day roost for brown-long eared bats. Works within 7 metres will comprise removing fixtures (such as stiles) associated with an existing Public Right of Way. Therefore, this roost will not be subject to disturbance impacts.</li> <li>• ST84283: Active day roost for 1 soprano pipistrelle; 2 common pipistrelles and 1 serotine (unconfirmed). Works are proposed 14.5 metres from this roost.</li> </ul> <p>It is recognized that disturbance beyond this could affect roost sites at much greater distances, such as the illumination of a commuting route to and from a roost site. However, mitigation to prevent this type of disturbance is specified within Section 5 of Appendix 8.4 Bat Technical Appendix (APP-077). These mitigation measures are also detailed within Row B3 of Table 3.1 REAC in the Outline Environmental Management Plan (APP-148).</p>	

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Biodiversity	Species mortality - Otters	<p>The assumptions regarding otters made in the Environmental Statement are queried. The ES assumes that otters do not cross the A303, however there are records of otter casualties and Somerset Otter Group were not consulted by the applicant's consultants. As well as being an issue currently, increased traffic speeds as a result of the proposed dualling is likely to increase the risk of future otter deaths unless adequately mitigated for.</p> <p>An underpass for otters should be provided near the Sparkford Roundabout supplemented by underpasses elsewhere. These can be designed into the scheme whilst there is opportunity to do so and included in the appropriate construction drawings and specifications.</p>	<p><u>Otters</u> Surveys completed during 2017 of all potentially suitable waterbodies within the 2 kilometre survey area, found evidence of otters only within Area A (Dyke Brook and a tributary). These waterbodies are over 1.2 kilometres north of the proposed carriageway. Area A is connected to Area C, a ditch which then connects to a point approximately 180 metres north-west of the proposed Sparkford Junction. However, no otter signs were identified along Area C during the surveys. Therefore, the surveys concluded that there was a low risk of otters being present within close proximity of the scheme, as all otter signs were some distance away.</p> <p>The Somerset Otter Group returned 6 records of dead otter since 2002. Of these:</p> <ul style="list-style-type: none"> <li>• One record was from the B3151 rather than the A303.</li> <li>• Two records were along the A303 but outside the scheme extent.</li> <li>• Two records did not have associated grid references and therefore it is not known where they were from (of these, 1 is unconfirmed).</li> <li>• One record is at the Sparkford Junction within the extent of the scheme. This record is from 2008.</li> </ul>	<b>AGREED</b>

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			<p>There is only 1 record of an otter death along the A303 within the scheme extent from the previous 17 years. Our surveys did not confirm this species to be present within waterbodies closer than 1.2 kilometres from the scheme. Therefore, the risk of otter crossing the carriageway is considered to be low.</p> <p>Otter casualties along the extent of the scheme will be monitored by the Highways England Operations Directorate, which is carried out routinely on major roads.</p>	
Biodiversity	Species mortality - Badgers	<p>Field surveys have identified a total of 68 badger setts within 500 metres of the scheme, of which 5 have been classified as main setts. However, no surveys/monitoring of badger road casualties along the A303 have been carried out. It is considered a single unspecified underpass for badgers is not sufficient mitigation.</p> <p>Further monitoring of the existing A303 for badger mortality should be carried out and included in the Environmental Statement.</p>	<p>Badger bait marking surveys were completed for 4 out of the 5 main setts identified during the course of protected species surveys for the scheme. Access to the 5th sett was not granted and therefore bait marking surveys could not be undertaken. Surveys found that badgers were crossing the carriageway at 1 location, to the west of Trait's Lane. A badger underpass and associated fencing is proposed at this location. Specifications of the tunnel would be in line with the referenced literature and will be decided during detailed design. SSDC will be consulted on the design process. In addition, badger casualties along the scheme extent would be monitored during the operational phase, as with otters.</p>	<b>AGREED</b>

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Biodiversity	Species mortality - Deer	<p>Deer casualties are not reported, and no survey of deer crossing has been included. Whilst deer are not considered of conservation concern they should be considered on health and safety grounds. No consultation appears to have been made with The Deer Initiative or Langbein Wildlife</p> <p>Consultation with The Deer Initiative and / or Langbein Wildlife concerning deer mortality and any related accident data for collisions and the results, along with any mitigation required, should be included in the Environmental Statement.</p>	<p>The Deer Initiative returned records of 50 deer casualties within 1 kilometre of the proposed scheme (between Yeovil and Wincanton) from 2008 to 2016. 12 of these are within the scheme extent. The plan provided by the DI indicates hot spots for casualties further east of the scheme but no particular hotspots within the scheme itself, although it should be noted that deer casualties are likely to be under recorded. The Road Safety Audit team are reviewing the likely risk to Health and Safety of potential deer collisions. The ES is not an appropriate place to report impacts to deer, as this species is not legally protected. As with other animals, deer casualties along the extent of the scheme will be monitored by the Highways England Operations Directorate.</p>	<b>AGREED</b>
Biodiversity		<p><b>Effects on Barn Owls and their habitats</b></p> <p>The Environmental Statement states that temporary habitat loss for Barn Owls will have a Minor Adverse Effect whereas permanent loss of habitat through the realignment of the road and land take of the scheme will be Moderate Adverse Effect due the proximity of the works to the territory</p>	<p>There is a loss in the area of grassland habitat available to barn owls as a result of the scheme. However, improved and poor semi-improved grassland will be replaced with species rich grassland, which will be well structured to provide optimal foraging habitat for barn owls, which will compensate for that which will be lost. The surrounding landscape comprises open countryside which is dominated by areas of grassland that would provide foraging habitat for barn owls. The lack of suitable nesting places for this species</p>	<b>AGREED</b>

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		<p>of one of the known breeding pairs. This would mean potential decrease in their foraging success without moving their territory. It appears that no mitigation is given for permanent loss of habitat affecting the viability of one breeding pair of barn owls.</p> <p>The scheme should provide replacement habitat to offset the permanent loss of habitat to ensure the viability of the breeding pair of barn owls possibly through off site enhancement. Defra's Biodiversity offsetting metric or Somerset's Habitats Evaluation Procedure should be used to calculate the equivalent amount of habitat needed to replace that lost during construction. Both methods include temporal and risk factors and are compatible with each other. This would then give confidence that the landscaping associated with the proposed road scheme provides sufficient mitigation and indeed provide enhancement.</p>	<p>is generally the limiting factor for population success and such provision is included within the scheme.</p> <p>Confirmed barn owl roosting and nesting places are all outside the red line boundary of the scheme (to the north), in proximity to suitable off-site grassland habitat that will be unaffected. The primary area of grassland to be created as part of the scheme is appropriately located in close proximity to the 2 'occupied breeding site' recorded, which will provide a feeding resource for these barn owls.</p> <p>Additional mitigation / enhancements measures provided for barn owls include:</p> <ul style="list-style-type: none"> <li>• To reduce mortality a barrier of a minimum of 3 metres high from the road surface along the majority of the scheme. This would be through a combination of screening planting, landscaping bunds and the alignment of the road. These mitigation measures are detailed within Row L3 of Table 3.1 REAC in the Outline Environmental Management Plan (APP-148).</li> <li>• Measures to deter barn owls from the highways verge, such as provision of</li> </ul>	

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		<p>Where mitigation is insufficient the appropriate amount and type should be added to the scheme either on or off site. Furthermore, the scheme should show a resultant enhancement for biodiversity including through habitat creation.</p> <p>The mitigation, enhancement and monitoring set out in the report must be secured through condition.</p>	<p>low-level permanent ground cover such as dense bramble or gorse alongside the carriageway. These mitigation measures are detailed within Row L3 of Table 3.1 REAC in the Outline Environmental Management Plan (APP-148).</p> <ul style="list-style-type: none"> <li>• Installation of barn owl boxes and hunting posts. The location of hunting posts will be determined during detailed design but will be placed away from the carriageway so as not to increase the risk of barn owl mortality. These mitigation measures are detailed within Row B4 of Table 3.1 REAC in the Outline Environmental Management Plan (APP-148).</li> </ul>	
Biodiversity		<p><b>Breeding birds</b> Environmental Statement, Volume 6.3 Appendix 8.6 Breeding Bird Technical Report states that a total of 47 species were recorded during the surveys within the study area and a total of 45 species were recorded within the works boundary. Nine species are listed on Section 41 of the NERC Act 2006 and one, the Hobby, is listed on Schedule 1 of The Wildlife</p>	<p>The pair of breeding hobbies were recorded approximately 280 metres north of proposed construction works. Consideration will be made of measures to minimise disturbance impacts to this species, such as timing of works in this area to avoid the breeding season or screening of the works using hoarding or similar, to be detailed within the OEMP.</p>	<b>AGREED</b>



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		<p>and Countryside Act 1981. A pair of Hobby was confirmed to be breeding within the study area but outside the scheme boundary as was the Song Thrush. Meadow Pipit, Mistle Thrush and Skylark, listed on Section 41 of the NERC Act 2006, were all also recorded immediately adjacent to the scheme boundary.</p> <p>The upgrade of the A303 along this section from a single carriageway to dual would change the ability of some species to move through the landscape due to the increased width of the road and associated landscaping and traffic speeds. The loss and fragmentation of breeding bird habitat would have a wide-ranging impact with about a third of all the species recorded utilising this habitats within the study area. The importance of hedgerows is especially pertinent considering the wider arable landscape.</p> <p>Mitigation is put forward but no assessment of impacts or mitigation for noise is given.</p>	<p><u>Noise</u></p> <p>The breeding bird report states: <i>“The current noise levels for the existing road will likely not be significantly less than the noise levels after the upgrade, and noise impacts on birds are likely to be reduced where the scheme is in cutting and / or is immediately adjacent to woodlands or noise barriers.”</i></p> <p><u>Increased risk of mortality</u></p> <p>In order to deter low flying birds from the road to minimise collisions with traffic, a barrier of a minimum of 3 metres high would be provided along the majority of the scheme. This would be through a combination of screening planting, landscaping bunds and the alignment of the road. Higher flying bird surveys would not be at increased risk.</p>	

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		<p>Defra’s Biodiversity offsetting metric or Somerset’s Habitats Evaluation Procedure should be used to calculate the equivalent amount of habitat needed to replace that lost during construction and subsequently due to traffic noise. Both methods include temporal and risk factors and are compatible with each other. This would then give confidence that the landscaping associated with the proposed road scheme provides sufficient mitigation and indeed provide enhancement. Where mitigation is insufficient the appropriate amount and type should be added to the scheme either on or off site. Furthermore, the scheme should show a resultant enhancement for biodiversity including through habitat creation. This needs to be included in an updated Environmental Statement.</p> <p>A CEMP should include detailed measures for avoiding impacts nesting birds. This would also include</p>		

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Biodiversity		<p>details of the screening to protect the nesting hobbies from disturbance.</p> <p><b>Consideration of Great Crested Newts</b></p> <p>Three distinct meta-populations of Great Crested Newts are identified, though only two would be subject to effects as a result of the scheme. Meta-population A, located at Downhead, has a medium population and meta-population C, located at Hazlegrove, has a medium population. Meta-population B located at Yarcombe was excluded from further assessment as all ponds associated with this meta-population are over 500 metres from the construction footprint of the scheme.</p> <p>The survey methods used are generally in accordance with best practice and fit for purpose.</p> <p>Pond 32 to the south of the A303 is possibly linked to ponds north of the A303 through dispersal of juveniles. The A303 is unlit and not heavily</p>	<p>The great crested newt (GCN) Mitigation Guidelines state: <i>“The potential for newts to cross roads successfully depends largely on traffic volume and the presence of any barriers, such as kerbs. Small roads and tracks with low vehicle numbers appear to present no major problems for newts, whilst larger, busier ones can limit dispersal and result in high mortality.”</i></p> <p>The A303 is the main trunk road connecting the southwest with the rest of the UK. Therefore, it is considered a ‘main road’ and would not come under the description of ‘small roads and tracks’. As such it is considered a significant barrier to GCN dispersal. No other ponds surveyed to the south of the road were found to support GCN, although it is likely that these are present outside our survey area.</p> <p>Regarding kerbs and gulleys, the following is provided within the GCN Technical Appendix: <i>The proposed drainage design along the main carriageway is for shallow sloping v-profile concrete or grass drains with associated gully pots. There are no associated kerbs and so the risk of GCN</i></p>	<p><b>AGREED</b></p>

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		<p>trafficked at night. Dualling will reduce the likelihood of successful dispersal occurring and increase the chances of mortality. What evidence is there that GCN's will cross / not cross roads? Are there other ponds to the south of the road that would support this apparently isolated population?</p> <p>No mitigation is given against potential hazards to great crested newts in the carriageway. Any gullies and kerbs can trap and cause mortality to the species.</p> <p>The applicant is required to provide further evidence on the ability of GCNs to cross roads or not and whether the population south of the road is likely to become increasingly isolated following construction of a dual carriageway. Each of these local populations would still need to be assessed for Favourable Conservation Status and included in an updated Environmental Statement.</p> <p>In areas where dispersal is likely to occur, and if no underpasses are provided / possible, the carriageways</p>	<p><i>becoming trapped is significantly reduced as there are no kerbs to channel GCN into the gully pots and act as pitfall traps. However, there is still potential for individual GCN to fall into the gully pots and become trapped. Kerbs and gully pots will be used on link roads, however, none of these are within 500 metres of any of the GCN ponds.</i></p> <p><i>To minimise the risk of killing and injury of GCN due to them becoming trapped in drainage gully pots associated with the new road, no kerbs should be installed around the gully pots which are within 500m of meta-population A and C. If kerbs are essential, the gully pots should be located at least 10cm from the edge of the kerb to reduce the risk of GCN being channelled into the gully pots. Sloped kerbs should also be used to minimise the barrier effect for newts. It is understood that no kerbs are proposed in the drainage design within 500m of any GCN metapopulation. Additionally, gully pots within 500m of the meta-populations should be fitted with Amphibian Gully Pot Ladders (British Herpetological Society) to allow a means of escape for any amphibians which become trapped.</i></p>	

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		<p>need to be designed to be GCN friendly, e.g. with appropriate drainage such as using offset gullies and traversable kerbing. These need to be shown in the relevant construction plans.</p>	<p>Natural England have provided a Letter of No Impediment for the GCN ghost licence – they are satisfied that the Favourable Conservation Status of GCN will be maintained.</p>	
Biodiversity		<p><b>Invertebrate survey and assessment</b> As well as brown hairstreak (see below), a single white letter hairstreak, a BAP, s41 priority species was recorded on the southern perimeter of Site 5 (?). Six species of nationally scarce flies were recorded and nationally scarce mining bee on Sites 2 and 10 (?). It would be helpful if the site locations were stated.</p> <p>No assessment of the effects of increased carriageway widths due to dualling the A303 is given with regard to invertebrate dispersal and possible increased mortality.</p> <p>No mention is made of establishing areas of scrub in the landscape proposals which is also important for invertebrates and their prey.</p>	<p><u>Impacts of widening the A303</u> The current A303 is a considerable barrier for dispersal of invertebrate species. The existing carriageway is approximately 17 metres wide and subject to significant air disturbance as a result of traffic which would impede movement of invertebrates. Therefore, dualling of the scheme will not further inhibit the dispersal of invertebrates.</p> <p><u>Mitigation for invertebrate species</u> Details of mitigation measures for invertebrate species are provided in Section 5 of Appendix 8.11 Invertebrate Technical Report (APP-084). These mitigation measures are also detailed within Row B10 of Table 3.1 REAC in the Outline Environmental Management Plan (APP-148). This is summarised below in the context of the distance of notable species from the scheme.</p>	<b>AGREED</b>

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			<p>Nationally scarce species on Site 2:</p> <ul style="list-style-type: none"> <li>Site 2 is 590 metres north of the red line boundary. Therefore, impacts are not anticipated.</li> </ul> <p>Nationally Scarce thick-headed fly <i>Leopoldius signatus</i> (Site 4):</p> <ul style="list-style-type: none"> <li>Site 4 is located approximately 10 metres to the north of the red line boundary.</li> </ul> <p>This invertebrate species is mainly associated with ivy blossom and therefore ivy will be planted to provide mitigation for this species. Ivy is not specified on indicative species list (although it is just indicative at this stage). Ivy will be added to the OEMP.</p> <p>White Letter Hairstreak (Site 5):</p> <ul style="list-style-type: none"> <li>Site 5 is 760 metres north of red line boundary. Therefore, no impacts anticipated</li> </ul> <p>Nationally Scarce soldierfly <i>Chorisops nagatomii</i> (Site 8):</p> <ul style="list-style-type: none"> <li>The ecology of this species is poorly understood and therefore its specific mitigation requirements are not</li> </ul>	

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			<p>known. However, the woodland where this species was recorded will be retained and enhanced with additional woodland planting adjacent.</p> <p>The mining bee <i>Lasioglossum pauxillum</i> (Site 10):</p> <ul style="list-style-type: none"> <li>• Site 10 is 180 metres north of red line boundary. Therefore, no direct / indirect impacts to habitat supporting this species.</li> <li>• Also, due to a considerable recent increase in both range and frequency, the species no longer fulfils the criteria to qualify for its current Nationally Scarce status. Therefore, no specific mitigation and enhancement recommendations are considered necessary.</li> </ul> <p>Nationally Scarce soldierfly <i>Chorisops nagatomii</i> (Site 15):</p> <ul style="list-style-type: none"> <li>• The hedgerow where the species was found will be retained.</li> <li>• Semi-improved grassland adjacent and to the south is outside the site</li> </ul>	

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			<p>boundary. Therefore, impacts are not anticipated.</p> <ul style="list-style-type: none"> <li>Planting of priority habitats will benefit this species.</li> </ul> <p><u>Dead wood</u> Dead wood will be retained on site where possible to provide habitat for saproxylic species. In particular, the feasibility of retaining the tree will be investigated. This mitigation measure is detailed within Row B1 of Table 3.1 REAC in the Outline Environmental Management Plan (APP-148).</p>	
Biodiversity		<p><b>Environmental Masterplan</b> There are extensive areas of amenity grassland that should not be top soiled and seeded. This would favour nitrogen loving species and reduce the diversity of flora species and hence invertebrates including pollinators. Similarly, the use of top soil for other habitat areas is likely to not fully exploit the diversity of species possible.</p> <p>It is noted that amenity grassland is specified for the routes of Public Rights of Way. Generally, the</p>	<p>It is agreed that areas of amenity grassland should be replaced with nutrient poor grassland, subject to cut and remove where possible. The Environmental Masterplan has already been updated to reflect this (following comments from Natural England on the ghost GCN licence).</p>	<b>AGREED</b>



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		<p>indicative species planting mixes are questionable for this part of Somerset and for the number of species.</p> <p>The specification for soils in the Soils Handling and Management Plan should state that amenity grassland areas be made with sub soil, chalk or planings and allowed to be colonised or seeded with a wild flower mix. These areas would then favour non-nitrogen loving species, provide a richer species diversity and reduce rank grassland, which in turn require less cutting and hence maintenance costs. Other areas of habitat enhancement should not be created using top soil but with sub soil, or sub soil with inverted top soil. This will promote flora species and an associated abundance of pollinators.</p> <p>Natural England requested that in the Landscape and Ecological Management Plan (LEMP), 'cut and remove' was employed for grassland management (including amenity grassland) to reduce nutrient levels</p>		

Topic	Sub-section	South Somerset District Council Comment	Highways England Response	Status
		<p>and increase diversity<sup>5</sup>. However, it is considered that this should be part of the Soils Handling and Management Plan.</p> <p>PROW can be maintained through being mown 1 metre wide through these areas when required. They do not especially need to be an amenity grass mix where a wild flower meadow mix would be of higher benefit to biodiversity. The Landscape Masterplan needs to be amended.</p> <p>The DCO requires amending and appropriate management given to habitats in a Landscape and Ecological Management Plan. Consultation with local ecologists and /or botanists is recommended prior to finalising planting mixes for landscaping.</p>		
People and Communities (and Non-Motorised Users)		Only light touch proposals regarding construction methodology and traffic management have been submitted to date. The Councils will therefore look to ensure that a mechanism is included within the wording of the	The dDCO provides at Requirement 13 that the detailed design will be submitted to the Secretary of State for approval following consultation with the relevant planning authority and local highway authority. Under Requirement 5, details of	<b>AGREED</b>

<sup>5</sup> [https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010036/TR010036-000243-A303\\_8.2\\_SoCG\\_NE.pdf](https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010036/TR010036-000243-A303_8.2_SoCG_NE.pdf)

Topic	Sub-section	South Somerset District Council Comment	Highways England Response	Status
		<p>DCO to secure an approved construction traffic management plan.</p> <p>SCC and SSSDC want a mechanism included in a Regulation to enable active involvement in the design of traffic management during construction.</p> <p>This issue was raised at the Hearings under Article 15(4), Article 19(4) and Requirement 12 where South Somerset District Council wishes to be a consultee on the basis of the social impact the as the potential to effect other functions of the relevant traffic management will have on the residents as well planning authority.</p>	<p>that consultation (including changes sought and whether they have been made, and where changes have not been made why not), must be submitted along with the application for approval of the detailed design. The Secretary of State will therefore have the views of the Councils before him when making any decision on the detailed design.</p>	
People and Communities (and Non-Motorised Users)		<p>Road closures are included within outline proposals. However, only outline details have been received to date. Whilst it is suggested that the majority of closures be overnight, the potential impacts on residents and the business community will need to be considered. This further re-enforces the need to ensure that there is appropriate provision within the DCO drafting to include a commitment for detailed measures to be agreed with</p>	<p>A full Traffic Management Plan will be produced by the appointed contractor prior to construction.</p> <p>Chapter 12 People and Communities includes an assessment on driver stress, community facilities and the local economy, which were completed in accordance with the Design Manual for Roads and Bridges (DMRB) Volume 11 Section 3 Parts 6, 8 and 9. The assessments consider both direct and indirect effects arising as a result of the construction of the scheme. The assessment</p>	<b>AGREED</b>

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		<p>the Local Highway Authority and Local Planning Authority, especially given that Yeovil Refresh includes highways improvements that may come forward during the construction period.</p> <p>This issue was raised at the Hearings under Article 15(4), Article 19(4) and Requirement 12 where South Somerset District Council wishes to be a consultee on the basis of the social impact the as the potential to effect other functions of the relevant traffic management will have on the residents as well planning authority.</p>	<p>for community facilities and the local economy identifies social and community resources in the study area, as well as receptors relevant to the topic, and identifies the activities relating to the scheme that could have an effect on those receptors and resources. The driver stress assessment considers the effect of the scheme on driver frustration, fear of potential accidents and route uncertainty during construction.</p>	
People and Communities (and Non-Motorised Users)		<p><b>Signage and Traffic Management</b> The effective management of traffic and good signage, especially during the construction phase of the proposed route will be essential, to ensure that businesses and communities are not negatively impacted.</p>	<p>The Principal Contractor will consult with tourist attractions and other business prior to the development of the Traffic Management Plan.</p>	<b>AGREED</b>
People and Communities (and Non-Motorised Users)		<p><b>Increased Vehicle Movements through West Camel and Sparkford</b> Vehicle movements increase as a result of the proposed scheme by 600 vehicles a day through West Camel (a 42% increase from 1,400 to 2,000 vehicles per day) and 1,800 vehicles a</p>	<p>Significant adverse effects on driver stress have not been predicted for vehicle travellers within the study area for the scheme, when taking into account average traffic flows and speeds at peak hours as required by the DMRB Volume 11 Section 3 Part 9.</p>	<b>NOT AGREED</b>

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		<p>day through Sparkford High Street (a 37% increase from 4,900 to 6,700 vehicles a day). This increase of vehicles would result in a significant adverse effect and should be mitigated through the DCO.</p> <p>Mitigation should be sought in consultation with the affected parishes and Somerset County Council.</p>	<p>Highways England does not consider the measures suggested to be necessary to make the scheme acceptable and they therefore do not form part of the proposed mitigation measures.</p>	

## Appendix A

Table 1: Early results from the noise model discussed with the EHOs

Receptor	LA10 18Hr freefield [dB]			
	DM OY	DS OY	DM DY	DS DY
[REDACTED]	47.1	48.5	47.6	49.4
[REDACTED]	44.2	46.5	44.7	47.4
[REDACTED]	45.2	46.2	45.8	47.2
[REDACTED]	46.5	47.6	47.1	48.6
[REDACTED]	47.0	47.5	47.6	48.4
[REDACTED]	44.5	45.6	45.1	46.6
[REDACTED]	47.2	47.2	47.8	48.1
[REDACTED]	46.8	46.7	47.5	47.6
[REDACTED]	47.5	46.8	48.1	47.8
[REDACTED]	56.4	51.3	57.1	52.2
[REDACTED]	52.7	49.5	53.4	50.4
[REDACTED]	49.7	50.5	50.3	51.5