



The Planning Inspectorate
Yr Arolygiaeth Gynllunio

SCOPING OPINION:

Proposed A358 Taunton to Southfields Dualling Scheme

Case Reference: TR010061

Adopted by the Planning Inspectorate (on behalf of the Secretary of State) pursuant to Regulation 10 of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017

May 2021

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1. INTRODUCTION

1.1 Background

- 1.1.1 On 25 March 2021, the Planning Inspectorate (the Inspectorate) on behalf of the Secretary of State (SoS) received a scoping request from Highways England (the Applicant) under Regulation 10 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) for the proposed A358 Taunton to Southfields Dualling Scheme (the Proposed Development).
- 1.1.2 In accordance with Regulation 10 of the EIA Regulations, an Applicant may ask the SoS to state in writing its opinion *'as to the scope, and level of detail, of the information to be provided in the environmental statement'*.
- 1.1.3 This document is the Scoping Opinion (the Opinion) provided by the Inspectorate on behalf of the SoS in respect of the Proposed Development. It is made on the basis of the information provided in the Applicant's report entitled 'A358 Taunton to Southfields Dualling Scheme Environmental Impact Assessment Scoping Report' (Volumes 1 and 2) (the Scoping Report). Volume 1 comprises the main report and Volume 2 contains the associated figures. This Opinion can only reflect the proposals as currently described by the Applicant. The Scoping Opinion should be read in conjunction with the Applicant's Scoping Report.
- 1.1.4 The Applicant has notified the SoS under Regulation 8(1)(b) of the EIA Regulations that they propose to provide an Environmental Statement (ES) in respect of the Proposed Development. Therefore, in accordance with Regulation 6(2)(a) of the EIA Regulations, the Proposed Development is EIA development.
- 1.1.5 Regulation 10(9) of the EIA Regulations requires that before adopting a scoping opinion the Inspectorate must take into account:
- (a) *any information provided about the proposed development;*
 - (b) *the specific characteristics of the development;*
 - (c) *the likely significant effects of the development on the environment; and*
 - (d) *in the case of a subsequent application, the environmental statement submitted with the original application.*
- 1.1.6 This Opinion has taken into account the requirements of the EIA Regulations as well as current best practice towards preparation of an ES.
- 1.1.7 The Inspectorate has consulted on the Applicant's Scoping Report and the responses received from the consultation bodies have been taken into account in adopting this Opinion (see Appendix 2).
- 1.1.8 The points addressed by the Applicant in the Scoping Report have been carefully considered and use has been made of professional judgement and experience in order to adopt this Opinion. It should be noted that when it comes to consider the ES the Inspectorate will take account of relevant legislation and guidelines.

The Inspectorate will not be precluded from requiring additional information if it is considered necessary in connection with the ES submitted with the application for a Development Consent Order (DCO).

- 1.1.9 This Opinion should not be construed as implying that the Inspectorate agrees with the information or comments provided by the Applicant in their request for an opinion from the Inspectorate. In particular, comments from the Inspectorate in this Opinion are without prejudice to any later decisions taken (eg on submission of the application) that any development identified by the Applicant is necessarily to be treated as part of a Nationally Significant Infrastructure Project (NSIP) or Associated Development or development that does not require development consent.
- 1.1.10 Regulation 10(3) of the EIA Regulations states that a request for a scoping opinion must include:
- (a) *a plan sufficient to identify the land;*
 - (b) *a description of the proposed development, including its location and technical capacity;*
 - (c) *an explanation of the likely significant effects of the development on the environment; and*
 - (d) *such other information or representations as the person making the request may wish to provide or make.*
- 1.1.11 The Inspectorate considers that this has been provided in the Applicant's Scoping Report. The Inspectorate is satisfied that the Scoping Report encompasses the relevant aspects identified in the EIA Regulations.
- 1.1.12 In accordance with Regulation 14(3)(a), where a scoping opinion has been issued in accordance with Regulation 10 an ES accompanying an application for an order granting development consent should be based on *'the most recent scoping opinion adopted (so far as the proposed development remains materially the same as the proposed development which was subject to that opinion)'*.
- 1.1.13 The Inspectorate notes the potential need to carry out an assessment under The Conservation of Habitats and Species Regulations 2017 ('the Habitats Regulations'), as amended by The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019. This assessment must be co-ordinated with the EIA in accordance with Regulation 26 of the EIA Regulations.

1.2 The Planning Inspectorate's Consultation

- 1.2.1 In accordance with Regulation 10(6) of the EIA Regulations the Inspectorate has consulted the consultation bodies before adopting a scoping opinion. A list of the consultation bodies formally consulted by the Inspectorate is provided at Appendix 1. The consultation bodies have been notified under Regulation 11(1)(a) of the duty imposed on them by Regulation 11(3) of the EIA Regulations to make information available to the Applicant relevant to the

preparation of the ES. The Applicant should note that whilst the list can inform their consultation, it should not be relied upon for that purpose.

- 1.2.2 The list of respondents who replied within the statutory timeframe and whose comments have been taken into account in the preparation of this Opinion is provided, along with copies of their comments, at Appendix 2, to which the Applicant should refer in preparing their ES.
- 1.2.3 The ES submitted by the Applicant should demonstrate consideration of the points raised by the consultation bodies. It is recommended that a table is provided in the ES summarising the scoping responses from the consultation bodies and how they are, or are not, addressed in the ES.
- 1.2.4 Any consultation responses received after the statutory deadline for receipt of comments will not be taken into account within this Opinion. Late responses will be forwarded to the Applicant and will be made available on the Inspectorate's website. The Applicant should also give due consideration to those comments in preparing their ES.
- 1.2.5 As a result of an administrative error, some consultation bodies were omitted from the scoping consultation exercise and were contacted subsequently to notify them of their duties. Any responses received after the consultation deadline as a result of this error will be published on the Inspectorate's website.

2. THE PROPOSED DEVELOPMENT

2.1 Introduction

2.1.1 The following is a summary of the information on the Proposed Development and its site and surroundings prepared by the Applicant and included in their Scoping Report. The information has not been verified and it has been assumed that the information provided reflects the existing knowledge of the Proposed Development and the potential receptors/ resources.

2.2 Description of the Proposed Development

2.2.1 The Applicant's description of the Proposed Development, its location and technical capacity (where relevant) is provided in Scoping Report Sections 2.4 and 2.5 paragraphs 2.4.1 to 2.5.15.

2.2.2 The Proposed Development is 13.6 kilometres (km) of new, rural all-purpose dual carriageway along the A358, which would connect the existing A303 at Southfields Roundabout near Ilminster with Junction 25 (J25) of the M5 at Taunton. It is depicted on Figures 1.1 and 2.1.

2.2.3 Modifications are proposed to J25, which include a designated left turn lane from the Taunton access (Toneway) onto the M5 northbound carriageway and widening of the southbound M5 off-slip. From an existing new roundabout junction ('Nexus 25') at J25 new dual carriageway would run offline from the existing A358 on low embankment, continue in a cutting between residential properties and then run parallel to the existing A358 at ground level before entering a deep cutting through Mattock's Tree Hill where an all movements grade separated junction would be constructed. It would then continue at ground level until it reached West Hatch Lane.

2.2.4 Between West Hatch Lane and the existing Griffin Lane Underbridge it would gradually adopt the horizontal and vertical alignment of the existing A358. The existing Griffin Lane Underbridge, which carries the single carriageway A358 over the top of Griffin Lane, would be retained to carry one half of the proposed dual carriageway and a new bridge would be constructed to carry the other half. The route would then initially follow the alignment of the existing A358 Hatch Beauchamp Bypass until reaching Capland. Between Capland and Kenny the route would run entirely offline just to the north-east of the existing A358, which would be retained as a local route between Ashill and Hatch Beauchamp and provide access to existing properties along the route.

2.2.5 From Kenny the route would follow the line of the existing A358, and new dual carriageway would be constructed through asymmetrical widening around the Ashill Bypass to Southfields Roundabout. A new all movements grade separated junction between the Proposed Development and the local road network would be constructed at Ashill. Minor changes would be made to Southfields Roundabout, mainly comprised of widening of the circulatory carriageway, a number of entry arms and the A303 eastbound exit (Ilminster Bypass).

- 2.2.6 A number of existing structures that provide crossings under the existing A358 would need to be widened or lengthened, or a new adjacent structure constructed before the existing structure is demolished or infilled. At some locations along the route the existing structure would convey the northbound carriageway and a new parallel structure would be constructed for the southbound carriageway. New structures would be required at grade separated junctions, proposed road crossings and where proposed offline sections of the A358 cross existing roads and watercourses. Table 2-2 ('Indicative types of structures in the proposed scheme') indicates that the Proposed Development could include improvements to five water structures and two underpasses; and five new road overbridges, one road underbridge, and seven watercourse structures. Changes are proposed to 25 local roads (set out in Table 2-3). In addition to the changes to existing and provision of new structures these include permanent closures and diversions. A number of PRow would be diverted and some would be permanently stopped up (indicated in Table 2-4).
- 2.2.7 Sustainable Drainage Systems (SuDS) would be utilised to either discharge surface water or provide surface attenuation and runoff control prior to discharge to adjacent water bodies. LED lighting would be mounted on either 8m, 10m or 12m columns at three of the junctions, including Southfields Roundabout. Diversion and/ or protection of water supply pipelines, sewers and overhead and underground high and low voltage electric and telecommunications would be required for the permanent works and potentially for the temporary works.
- 2.2.8 The construction programme would comprise two phases: Section 1, between the M5 J25 and the Hatch Lane junction on the existing A358; and Section 2, from Hatch Lane to the Southfields Roundabout on the A303. The expected start date is not indicated. It is anticipated that it would take 44 months to construct the Proposed Development and that it would open to traffic in 2028, subject to review.
- 2.2.9 A main site construction compound and several smaller satellite compounds, anticipated to be located at Mattock's Tree Green and Ashill, would be required. The proposed location of the main compound is not yet known although potential locations at the northern end of the Proposed Development, adjacent to the M5 J25, are under consideration. Haul routes would be created for construction traffic. Small temporary office and laydown areas would be required at bridge locations and at the tie-ins to the Nexus 25 roundabout and the A303 Southfields roundabout. Limited temporary road closures along the existing A358 may be required at night, weekends and bank holidays, together with other temporary traffic management measures including lane closures and contraflows.
- 2.2.10 The proposed application site comprises the existing section of the A358 between Taunton and Ilminster. It is predominantly single carriageway apart from two short sections of dual carriageway. At the western boundary of the site the A358 forms one of five arms of the M5 J25 roundabout which is a partially signalised three-lane roundabout under the M5 motorway. At the eastern boundary of the site the A358 forms one of five arms of the Southfields Roundabout which is situated on the A303 at the western end of the Ilminster Bypass. There are a number of at-grade local road junctions along the A358

between Taunton and Southfields Roundabout and other local roads that provide access to local villages and one grade separated crossing over the A358 which carries the A358 Hatch Beauchamp Bypass over Griffin Lane. A site location plan is provided at Figure 1.1 and the junctions and local roads are shown on Figure 2.2.

- 2.2.11 The existing A358 passes through a largely rural area between Taunton and Ilminster comprising agricultural land uses, villages, hamlets, scattered farms and individual dwellings. It provides direct access to a number of local communities and businesses including churches, indoor sports facilities, schools, care homes, doctors' surgeries and shops.
- 2.2.12 23 public rights of ways (PRoW) cross or meet the existing A358. The land adjacent to it is predominantly Grade 3 agricultural land, with small areas of Grade 4 land at the southern end of the A358 and associated with Venner's Water further north, although some Grade 1 and Grade 2 land is located in close proximity. Several potentially contaminative land uses have been identified along the A358, including historical landfills, sewage works, commercial activities and fuel storage sites. The East Reach Air Quality Management Area (AQMA) is located 2km to the west and Henlade AQMA is located 300m to the north of the existing A358.
- 2.2.13 There are a number of ecologically designated sites near the existing A358, including European sites, forming part of the National Site Network, Sites of Special Scientific Interest (SSSIs), a National Nature Reserve (NNR) and Local Nature Reserves (LNRs), and also a number of areas of semi-natural ancient woodland.
- 2.2.14 The existing A358 crosses Flood Zones (FZs) 2 and 3 and is in an area at risk of flooding from the Clatworthy and Luxhay Reservoirs located to the west of Taunton and from Chard Reservoir located to the north east of Chard. It is crossed by 12 known watercourses.
- 2.2.15 The Blackdown Hills Area of Outstanding Natural Beauty (AONB) is located approximately 2.2km to the west at its nearest point to the Proposed Development. 141 listed buildings are located within 1km of the existing A358, a Grade II Registered Park and Garden is located 490m to the east, and three conservation areas are located within 1km.

2.3 The Planning Inspectorate's Comments

Description of the Proposed Development

- 2.3.1 The ES should include the following:
 - a description of the Proposed Development comprising at least the information on the site, design, size and other relevant features of the development; and
 - a description of the location of the development and description of the physical characteristics of the whole development, including any requisite

demolition works and the land-use requirements during construction and operation phases

- 2.3.2 The Inspectorate notes that decommissioning has not been considered within the Scoping Report and that it is proposed that decommissioning is scoped out of the EIA on the basis that the Proposed Development would be unlikely to be decommissioned as it would form an integral part of the Strategic Road Network (SRN). The Inspectorate is content with this approach.
- 2.3.3 A number of the works to be included in the Proposed Development are described as temporary. The time period this covers should be defined in the ES for each of the temporary works, as the Inspectorate assumes that not all the temporary works will remain in place for the entire duration of the construction period.
- 2.3.4 Paragraph 5.3.2 states that the indicative redline boundary shown on Figure 1.1 includes 'a current indication of anticipated areas required for construction and environmental mitigation', although no areas are identified as such on Figure 1.1 or any other figure included in Volume 2 of the Scoping Report. Plans of the Proposed Development that form part of the DCO application ES should clearly identify any areas of land proposed to be allocated for mitigation purposes, and the ES should include an assessment of any potential likely significant effects (LSEs) arising from that use.
- 2.3.5 Paragraph 2.4.24 – 2.4.25 indicates that lighting would be provided at West Hatch Lane Junction and the 'proposed junction between the Kenny Link and the main road through Ashill'. It is unclear to which junctions these refer as Table 2-3 ('Treatment to local roads') indicates that West Hatch Lane would be permanently closed at the point where the Proposed Development crosses it and it is not included in the list of junctions provided in Table 2-1, which appears to describe existing junctions that are proposed to be altered or proposed new junctions. There is no other reference in the Scoping Report either to the 'Kenny Link' or to a new junction between it and Ashill. The description of the works associated with the Proposed Development provided in the ES should comprehensively and clearly identify each of the elements.
- 2.3.6 Paragraph 2.4.29 of the Scoping Report indicates that two National High Pressure (NHP) gas mains and the CenturyLink Atlantic Crossing Cables 1 and 2 would be affected by the Proposed Development. A description of the proposed works in relation to this infrastructure and any resulting potential effects and required mitigation should be included in the ES.
- 2.3.7 The description of the Proposed Development set out in Chapter 2 of the Scoping Report does not include the proposed permanent diversion of the River Ding, which is referenced in a number of technical chapters. The description contained in the ES must be comprehensive and provide detailed information on and plans depicting, where appropriate, each of the elements of the Proposed Development.

Alternatives

- 2.3.8 The EIA Regulations require that the Applicant provide 'A description of the reasonable alternatives (for example in terms of development design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects'.
- 2.3.9 The Inspectorate acknowledges the Applicant's intention to consider alternatives within the ES. The Inspectorate would expect to see a discrete section in the ES that provides details of the reasonable alternatives studied and the reasoning for the selection of the chosen option(s), including a comparison of the environmental effects.

Flexibility

- 2.3.10 The Inspectorate notes the Applicant's desire to incorporate flexibility into their draft DCO (dDCO) and its intention to apply a Rochdale Envelope approach for this purpose. Where the details of the Proposed Development cannot be defined precisely, the Applicant will apply a worst case scenario. The Inspectorate welcomes the reference to Planning Inspectorate Advice Note nine 'Using the 'Rochdale Envelope'¹ in this regard.
- 2.3.11 The Applicant should make every attempt to narrow the range of options and explain clearly in the ES which elements of the Proposed Development have yet to be finalised and provide the reasons. At the time of application, any Proposed Development parameters should not be so wide-ranging as to represent effectively different developments. The development parameters should be clearly defined in the dDCO and in the accompanying ES. It is a matter for the Applicant, in preparing an ES, to consider whether it is possible to robustly assess a range of impacts resulting from a large number of undecided parameters. The description of the Proposed Development in the ES must not be so wide that it is insufficiently certain to comply with the requirements of Regulation 14 of the EIA Regulations.
- 2.3.12 It should be noted that if the Proposed Development materially changes prior to submission of the DCO application, the Applicant may wish to consider requesting a new scoping opinion.

¹ Advice Note nine: Using the Rochdale Envelope. Available at:
<https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/>

3. ES APPROACH

3.1 Introduction

- 3.1.1 This section contains the Inspectorate's specific comments on the scope and level of detail of information to be provided in the Applicant's ES. General advice on the presentation of an ES is provided in the Inspectorate's Advice Note Seven 'Environmental Impact Assessment: Process, Preliminary Environmental Information and Environmental Statements'² and associated appendices.
- 3.1.2 Aspects/ matters (as defined in Advice Note Seven) are not scoped out unless specifically addressed and justified by the Applicant, and confirmed as being scoped out by the Inspectorate. The ES should be based on the Scoping Opinion in so far as the Proposed Development remains materially the same as the Proposed Development described in the Applicant's Scoping Report.
- 3.1.3 The Inspectorate has set out in this Opinion where it has/ has not agreed to scope out certain aspects/ matters on the basis of the information available at this time. The Inspectorate is content that the receipt of a Scoping Opinion should not prevent the Applicant from subsequently agreeing with the relevant consultation bodies to scope such aspects / matters out of the ES, where further evidence has been provided to justify this approach. However, in order to demonstrate that the aspects/ matters have been appropriately addressed, the ES should explain the reasoning for scoping them out and justify the approach taken.
- 3.1.4 The Inspectorate has made effort to ensure that this Scoping Opinion is informed through effective consultation with the relevant consultation bodies. In preparing the ES, Applicants are expected to have regard to consultation responses received from consultation bodies and to demonstrate how they have been taken into account, where relevant. Unfortunately, at this time the Inspectorate is unable to receive hard copy consultation responses, and this may affect a consultation body's ability to engage with the scoping process. The Inspectorate also appreciates that strict compliance with COVID-19 advice may affect a consultation body's ability to provide their consultation response. The Inspectorate considers that Applicants should make effort to ensure that they engage effectively with consultation bodies and where necessary further develop the scope of the ES to address their concerns and advice. The ES should include information to demonstrate how such further engagement has been undertaken and how it has influenced the scope of the assessments reported in the ES.
- 3.1.5 Where relevant, the ES should provide reference to how the delivery of measures proposed to prevent/ minimise adverse effects is secured through dDCO requirements (or other suitably robust methods) and whether relevant consultation bodies agree on the adequacy of the measures proposed.

² Advice Note Seven: Environmental Impact Assessment: Process, Preliminary Environmental Information and Environmental Statements and annex. Available from: <https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/>

3.2 Relevant National Policy Statements (NPSs)

- 3.2.1 Sector-specific NPSs are produced by the relevant Government Departments and set out national policy for NSIPs. They provide the framework within which the Examining Authority (ExA) will make their recommendation to the SoS and include the Government's objectives for the development of NSIPs. The NPSs may include environmental requirements for NSIPs, which Applicants should address within their ES.
- 3.2.2 The designated NPS relevant to the Proposed Development is the NPS for National Networks (NPSNN).

3.3 Scope of Assessment

General

- 3.3.1 The Inspectorate recommends that in order to assist the decision-making process, the Applicant uses tables:
- to demonstrate how the assessment has taken account of this Opinion;
 - to identify and collate the residual effects after mitigation for each of the aspect chapters, including the relevant inter-relationships and cumulative effects;
 - to set out the proposed mitigation and/ or monitoring measures including cross-reference to the means of securing such measures (eg, a dDCO requirement);
 - to describe any remedial measures that are identified as being necessary following monitoring; and
 - to identify where details are contained in the Habitats Regulations Assessment (HRA report) (where relevant), such as descriptions of National Site Network sites and their locations, together with any mitigation or compensation measures, that inform the findings of the ES.
- 3.3.2 Paragraph 2.4.1 states that the "*footprint*" of the Proposed Development is depicted on Figure 2.1, which shows a red line boundary, identified as such in the Legend. The Inspectorate assumes that that any references to the footprint denote the red line boundary. However, references are made throughout the Scoping Report to the "*construction/ engineering/ permanent footprint*", although these terms are not explained. The terminology used in the ES should be defined and the extent of the Proposed Development should be clearly and consistently reflected throughout the ES so that the baseline, study areas and potential effects can be fully understood.
- 3.3.3 The summary table of matters scoped out (Table 17-1) provided in Chapter 17 does not include all of the matters proposed to be scoped out within the technical chapters of the Scoping Report. In addition, it indicates that demolition has been scoped out during construction and operation although there are numerous references to demolition during construction, eg of existing bridges and

residential properties. The Inspectorate considers that an assessment of demolition effects during construction should be included within the assessment.

- 3.3.4 The Inspectorate considers that where a DCO application includes works described as 'Associated Development', that could themselves be defined as an improvement of a highway, the Applicant should ensure that the ES accompanying that application distinguishes between effects that primarily derive from the integral works which form the proposed (or part of the proposed) NSIP and those that primarily derive from the works described as Associated Development. This could be presented in a suitably compiled summary table. This will have the benefit of giving greater confidence to the Inspectorate that what is proposed is not in fact an additional NSIP defined in accordance with s22 of the PA2008.

Baseline Scenario

- 3.3.5 The ES should include a description of the baseline scenario with and without implementation of the development as far as natural changes from the baseline scenario can be assessed with reasonable effort on the basis of the availability of environmental information and scientific knowledge.
- 3.3.6 In light of the number of ongoing developments within the vicinity of the Proposed Development application site, the Applicant should clearly state which developments will be assumed to be under construction or operational as part of the future baseline.

Forecasting Methods or Evidence

- 3.3.7 The ES should contain the timescales upon which the surveys which underpin the technical assessments have been based. For clarity, this information should be provided either in the introductory chapters of the ES (with confirmation that these timescales apply to all chapters), or in each aspect chapter.
- 3.3.8 The Inspectorate expects the ES to include a chapter setting out the overarching methodology for the assessment, which clearly distinguishes effects that are 'significant' from 'non-significant' effects. Any departure from that methodology should be described in individual aspect assessment chapters.
- 3.3.9 The Inspectorate notes that Chapter 5 (Environmental assessment methodology) Table 5-2 combines the sensitivity of a receptor (very high to negligible) and the magnitude of an impact (major to no change) to determine the significance of an effect. Descriptions of the sensitivity and magnitude values are not provided and it is stated that where discipline-specific criteria and descriptors are available they are set out in the technical chapters of the Scoping Report. The ES overarching methodology chapter should include a description of the generic sensitivity and magnitude values that will be applied where there is no discipline-specific information available.
- 3.3.10 The ES should include details of difficulties (for example technical deficiencies or lack of knowledge) encountered compiling the required information and the main uncertainties involved.

Residues and Emissions

- 3.3.11 The EIA Regulations require an estimate, by type and quantity, of expected residues and emissions. Specific reference should be made to water, air, soil and subsoil pollution, noise, vibration, light, heat, radiation and quantities and types of waste produced during the construction and operation phases, where relevant. This information should be provided in a clear and consistent fashion and may be integrated into the relevant aspect assessments.
- 3.3.12 The Inspectorate notes that it is proposed that the assessment of heat and radiation is scoped out of the EIA because as a road improvement scheme it would not generate any notable emissions of heat and/ or radiation from the proposed works, technology or operation that could result in LSEs on the environment. Given the nature of the Proposed Development the Inspectorate is content with this approach.

Mitigation and Monitoring

- 3.3.13 Any mitigation relied upon for the purposes of the assessment should be explained in detail within the ES. The likely efficacy of the mitigation proposed should be explained with reference to residual effects. The ES should also address how any mitigation proposed is secured, with reference to specific dDCO requirements or other legally binding agreements.
- 3.3.14 The Inspectorate notes that an 'initial' Environmental Management Plan (EMP), that contains all the measures proposed to manage environmental effects during construction and operation, will be submitted as part of the DCO application. Clear and explicit cross-reference should be made from the information on mitigation contained in the ES to the relevant sections of the EMP, the measures within which must be secured in the DCO.
- 3.3.15 The ES should identify and describe any proposed monitoring of significant adverse effects and how the results of such monitoring would be utilised to inform any necessary remedial actions.

Risks of Major Accidents and/ or Disasters

- 3.3.16 The ES should include a description and assessment (where relevant) of the likely significant effects resulting from accidents and disasters applicable to the Proposed Development. The Inspectorate notes that there are two Major Accident Hazard Pipelines operated by National Grid Gas PLC that pass through the southernmost section of the application site. The Applicant should make use of appropriate guidance (eg, that referenced in the Health and Safety Executive's (HSE's) Annex to the Inspectorate's Advice Note 11) to better understand the likelihood of an accident or disaster and the Proposed Development's susceptibility to potential major accidents and hazards. The description and assessment should consider the vulnerability of the Proposed Development to a potential accident or disaster and also the Proposed Development's potential to cause an accident or disaster. The assessment should specifically assess significant effects resulting from the risks to human health, cultural heritage or the environment. Any measures that will be

employed to prevent and control significant effects should be presented in the ES.

- 3.3.17 Relevant information available and obtained through risk assessments pursuant to national legislation may be used for this purpose. Where appropriate, this description should include measures envisaged to prevent or mitigate the significant adverse effects of such events on the environment and details of the preparedness for and proposed response to such emergencies.
- 3.3.18 The Inspectorate notes that the Scoping Report has had regard to guidance contained in the Institute of Environmental Management and Assessment's (IEMA's) 'Major Accidents and Disasters in EIA: A Primer' (2020), and that it is proposed to scope out major accidents and disasters from the EIA on the basis of the findings of a Risk Identification exercise (contained in Appendix B of the Scoping Report), that considered the Proposed Development's resilience to potential major accidents and disasters and its potential to cause an accident or disaster. It is stated that the Risk Identification exercise concluded that all relevant major accidents and disasters considered would be appropriately assessed and mitigated through other environmental aspects reported in the ES, and that there were no risks of major accidents and disasters anticipated with suitable mitigation in place. The Inspectorate assumes that what is meant is that major accidents and disasters will be integrated into the ES rather than presented in a discrete technical chapter in the ES. For the avoidance of doubt, the Inspectorate does not agree that this matter may be scoped out in its entirety but agrees that a discrete major accidents and disasters chapter is not required in the ES on the basis that the matter will be considered within other ES technical chapters.

Climate and Climate Change

- 3.3.19 The ES should include a description and assessment (where relevant) of the likely significant effects the Proposed Development has on climate (for example having regard to the nature and magnitude of greenhouse gas emissions) and the vulnerability of the project to climate change. Where relevant, the ES should describe and assess the adaptive capacity that has been incorporated into the design of the Proposed Development. This may include, for example, alternative measures such as changes in the use of materials or construction and design techniques that will be more resilient to risks from climate change.

Transboundary Effects

- 3.3.20 Schedule 4 Part 5 of the EIA Regulations requires a description of the likely significant transboundary effects to be provided in an ES.
- 3.3.21 The Scoping Report concludes that the Proposed Development is not likely to have significant effects on a European Economic Area (EEA) State and proposes that transboundary effects do not need to be considered within the ES.
- 3.3.22 Having considered the information provided in Appendix A of the Scoping Report and the nature and location of the Proposed Development the Inspectorate is not aware that there are potential pathways of effect to any EEA States but

recommends that, for the avoidance of doubt, the ES details any such consideration and assessment.

A Reference List

- 3.3.23 A reference list detailing the sources used for the descriptions and assessments must be included in the ES.

3.4 Coronavirus (COVID-19) Environmental Information and Data Collection

- 3.4.1 The Inspectorate understands government enforced measures in response to COVID-19 may have consequences for an Applicant's ability to obtain relevant environmental information for the purposes of their ES. The Inspectorate understands that conducting specific surveys and obtaining representative data may be difficult in the current circumstance.
- 3.4.2 The Inspectorate has a duty to ensure that the environmental assessments necessary to inform a robust DCO application are supported by relevant and up to date information. Working closely with consultation bodies, the Inspectorate will seek to adopt a flexible approach, balancing the requirement for suitable rigour and scientific certainty in assessments with pragmatism in order to support the preparation and determination of applications in a timely fashion.
- 3.4.3 Applicants should make effort to agree their approach to the collection and presentation of information with relevant consultation bodies. In turn the Inspectorate expects that consultation bodies will work with Applicants to find suitable approaches and points of reference to allow preparation of applications at this time. The Inspectorate is required to take into account the advice it receives from the consultation bodies and will continue to do so in this regard.

3.5 Confidential and Sensitive Information

- 3.5.1 In some circumstances it will be appropriate for information to be kept confidential. In particular, this may relate to personal information specifying the names and qualifications of those undertaking the assessments and / or the presence and locations of rare or sensitive species such as badgers, rare birds and plants where disturbance, damage, persecution or commercial exploitation may result from publication of the information.
- 3.5.2 Where documents are intended to remain confidential the Applicant should provide these as separate documents with their confidential nature clearly indicated in the title and watermarked as such on each page. The information should not be incorporated within other documents that are intended for publication or which the Inspectorate would be required to disclose under the Environmental Information Regulations 2004.
- 3.5.3 The Inspectorate adheres to the data protection protocols set down by the Information Commissioners Office³. Please refer to the Inspectorate's National

³ <https://ico.org.uk>

Infrastructure privacy notice⁴ for further information on how personal data is managed during the Planning Act 2008 process.

⁴ <https://infrastructure.planninginspectorate.gov.uk/help/privacy-notice/>

4. ASPECT BASED SCOPING TABLES

4.1 Air Quality

(Scoping Report Section 6)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.1.1	6.2.8	PM ₁₀ emissions	<p>It is proposed that particulate matter (PM₁₀) emissions are scoped out of further assessment. This is on the basis that Defra's projected background concentrations in the study area are well below the national air quality objectives (AQOs) (set out in the Air Quality (England) Regulations 2000) and do not indicate that there is a risk of exceeding the PM₁₀ AQO or limit values (LVs); vehicle emission factors for PM₁₀ are 'relatively low and at least an order of magnitude lower than for Nitrogen oxides (NO_x)'; and there are no AQMAs in the study area declared for any exceedances of the PM₁₀ AQO.</p> <p>The Inspectorate notes that Defra's projected maximum background concentrations for the area covered by the Proposed Development alignment for 2019 are presented in Table 6-3 and show the PM₁₀ concentration as 14.2µg/m³. The Inspectorate agrees that this matter may be scoped out based on comparison with current limit values, and evidence supporting this position should be provided in the ES.</p>
4.1.2	6.7.6	Emissions from construction site equipment	<p>It is proposed that construction emissions from site equipment are scoped out of the assessment based on the temporary nature of the works and that the equipment is anticipated to have minimal impact on overall pollutant concentrations. The Inspectorate notes that best practice measures to reduce emissions from site equipment will be included in the EMP and agrees that this matter may be scoped out. This should be explained in the ES, including details of how plant and</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			equipment have been located to avoid effects on receptors, and cross-reference made to the relevant section(s) of the EMP.

ID	Ref	Other points	Inspectorate's comments
4.1.3	6.2.5	Study area	Reference is made to a figure outwith the Scoping Report that depicts the extent of Highways England's Project Control Framework (PCF) Stage 2 'affected road network' (ARN), which has been used to determine the study area. Relevant documents referenced in the text and relied upon for the purposes of the EIA should be submitted alongside or be appended to the ES.
4.1.4	6.2.7 & 6.4.4	Study area and potential impacts	The Inspectorate notes that information on construction traffic flows was not available prior to the submission of the Scoping Report and that therefore it is not yet known whether construction traffic vehicle movements will be screened into the assessment. It is proposed that a 'simple' assessment will be carried out if the vehicle movements exceed the Design Manual for Roads and Bridges (DMRB) air quality thresholds (as set out in paragraph 6.2.2 of the Scoping Report). The Inspectorate accepts this approach, although it considers that an estimate of construction traffic volumes would have supported a more definitive answer. The decision as to whether a simple assessment is required should be informed by an assessment of the sensitivity of the receiving environment.
4.1.5	6.3.2 & 6.3.7	Baseline	The East Reach AQMA is described in paragraph 6.3.7 as located approximately 2.5km west of the Proposed Development, although it is described as approximately 2km away in paragraph 6.3.2. Such discrepancies should be avoided in the ES and care taken to ensure that information provided in the ES is consistent throughout.

ID	Ref	Other points	Inspectorate's comments
4.1.6	6.3.12	Baseline	It is stated that there are five Defra Pollution Climate Mapping (PCM) links identified which overlap with the study area and that they are depicted on Figure 6.3, however only three links appear to be shown therein. Care should be taken to ensure that baseline information is accurately and clearly presented in the ES.
4.1.7	Section 6.5	Mitigation – construction	It is stated that best practice mitigation measures would be included in the EMP, activity permits and Traffic Management Plan (TMP) in relation to construction dust; and included in the EMP in relation to effects from construction vehicles. The ES should clearly identify potential effects and the measures proposed to mitigate them, and provide explicit cross-reference to the location of relevant information contained in other application documents, including in respect of where the measures are secured.
4.1.8	6.7.27	Methodology - operation	Paragraph 5.2.25 states that an assessment against the future baseline scenario would typically include the 'opening year' of the Proposed Development and the 'design year' (15 years after opening). However, the air quality chapter indicates that only the opening year would be assessed. The Inspectorate notes that it is explained that the opening year of the proposed scheme is likely to be the worst-case scenario for local air quality, as vehicle emissions and background pollutant concentrations are anticipated to decrease over time due to improvements in vehicles and fuel technologies. The Scoping Report does not address the potential for the Proposed Development to attract significant amounts of new traffic using the route to the M5. The Inspectorate considers that the air quality assessment should include consideration of the design year and the assessment should explain the future baseline and assumptions about future vehicle mix that underpin the assessment of the design year.

ID	Ref	Other points	Inspectorate's comments
4.1.9	6.7.30 & 6.7.39	Methodology - operation	It is indicated that the air quality assessment will consider potential effects only on designated ecological sites/ habitats. The ES should also include an assessment of potential effects on non-designated habitats and on species where significant effects are likely to occur.
4.1.10	6.8.8	Assumptions	It is stated that " <i>there is the potential</i> " for the Proposed Development to open in phases but that a single year of opening, " <i>when the greatest change in road traffic movements would be experienced</i> ", will be assumed for the air quality assessment, on which the quantitative assessment of road traffic emissions will therefore be based. (Paragraph 2.5.3 of the Scoping Report indicates that a section of the new carriageway would be opened to traffic before the full opening of the Proposed Development.) It should be clearly explained in the ES how this approach represents the worst case scenario for the assessment of effects on air quality.

4.2 Cultural heritage

(Scoping Report Section 7)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.2.1	7.7.2	Below ground archaeological deposits - operation	<p>The Scoping Report states that below ground archaeological deposits would not be affected by the operation of the new dual carriageway and are scoped out of further assessment.</p> <p>No further information has been provided to support this approach, such as an assessment of potential effects of compaction, vibration, and dewatering of palaeoenvironmental and archaeological deposits and features during operation. In the absence of sufficient justification the Planning Inspectorate does not agree that this matter may be scoped out.</p>

ID	Ref	Other points	Inspectorate's comments
4.2.2	7.3.3	Baseline - Listed buildings	<p>The list of Grade I Listed Buildings located within the 1km study area, does not include Hatch Court, which is just outside the study area, although Hatch Court (and its Grade II Listed Registered Park and Garden, which is within the 1km study area) are mentioned briefly in paragraph 8.3.11 of the Landscape chapter of the Scoping Report. Noting the statement in paragraph 7.2.1 that designated heritage resources lying outside the study area may also be considered, the Inspectorate advises that Hatch Court and its Grade II Listed Registered Park and Garden should be included in the cultural heritage assessment. Comprehensive cross-referencing should be provided as appropriate between the ES Cultural Heritage and Landscape chapters.</p>

ID	Ref	Other points	Inspectorate's comments
4.2.3	7.3.9 – 7.3.14 & Figure 7.1	Baseline - Non-designated heritage resources	The Inspectorate notes that the Scoping Report does not include a plan showing the location of non-designated heritage assets. Non-designated assets can also comprise an important part of the settings of designated assets. The ES should identify any non-designated features that could be significantly affected by the Proposed Development and include figures showing non-designated heritage assets and archaeological sites and findspots.
4.2.4	7.3.15	Baseline - Historic landscape	The Scoping Report sets out some Historic Landscape Character (HLC) classifications for the study area but does not refer to any HLC studies on which these are based. All information sources relied upon for the purposes of the assessment should be appropriately referenced in the text.
4.2.5	N/A	Phasing and assessment of temporary works	It should be ensured that that the potential impacts of phasing of temporary works and any diversions that might bring construction activities or traffic in closer proximity to designated heritage assets is fully assessed in the ES.

4.3 Landscape

(Scoping Report Section 8)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.3.1	8.3.14	Baseline - Local Landscape Character Areas (LLCAs)	<p>The Scoping Opinion states that the Proposed Development will extend through the Lower Lias Foothills and Lowland Local Landscape Character Area (LLCA) within Region 2 (Blackdown Hills Plateau Foothills and Valleys) of the Landscape of South Somerset character assessment, and that all other Regions and LLCAs have been scoped out due to their distance and lack of landscape relationship to the existing A358 and site of the Proposed Development.</p> <p>Two of the three plans comprising Figure 8.1 appear to show that the Proposed Development extends through several other LLCAs, including 1A Vale of Taunton Deane, 5A North Curry, 4A Fivehead Vale, and Ham Hill Plateau, Yeovil Sands Escarpments and Valleys. In light of this, the Inspectorate does not agree to scope this matter out.</p>
4.3.2	8.3.21	Baseline - Road users	<p>The Scoping Report notes that views from the roads away from the existing A358 are well-enclosed due to the narrow, meandering roads and the hedgerows and hedge banks, with more distant views for road users often limited to glimpses through field gates or along straighter stretches of road. It is thus proposed to scope out users of existing secondary roads.</p> <p>The Inspectorate agrees that this matter may be scoped out on the basis of the information provided.</p>
4.3.3	8.4.5	Potential landscape impacts - National Character Area (NCA) 146	<p>The Scoping Report states that as NCA 146 includes the existing A358 south of M5 J22, and the NCA also includes other major road corridors, it is unlikely that the nature of the change would have the</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			<p>potential to result in significant effects on NCA 146; and therefore it proposes to scope the NCA 146 out of the landscape assessment.</p> <p>The Inspectorate agrees that this matter may be scoped out on the basis of the information provided.</p>
4.3.4	8.4.6 & 8.4.10	Potential landscape impacts - NCA 147 and the Blackdown Hills AONB	<p>The Scoping Report states in paragraph 8.4.6 that it is unlikely that landscape change would result in significant effects on the landscape character of NCA 147 and the Blackdown Hills AONB, and proposes that both are scoped out of the landscape assessment. This is on the basis that the majority of NCA 147 and the Blackdown Hills AONB have a limited visual relationship with the A358 except for notable specific viewpoints, and as there would be no change to the NCA and AONB pattern, landform, scale or vegetation the Proposed Development would result only in perceptual changes to landscape character.</p> <p>The Inspectorate agrees that a landscape assessment of these features may be scoped out according to the information provided in the Scoping Report, and notes that the ES will contain a visual impact assessment, which will include potential impacts on long-distance views towards the Proposed Development from within the Blackdown Hills AONB and NCA 147. The visual impact assessment should include consideration of potential impacts of the Proposed Development arising from light pollution on views, where significant effects could occur.</p>

ID	Ref	Other points	Inspectorate's comments
4.3.5	8.3.22	Baseline - Viewpoints within the Blackdown Hills AONB	The Inspectorate welcomes the consideration of viewpoints from within the Blackdown Hills AONB looking towards the Proposed Development. There may be additional potential viewpoints that

ID	Ref	Other points	Inspectorate's comments
			should be included in the assessment, and the location of these should be discussed and agreed with relevant consultees. The Applicant's attention is drawn to the comments of Somerset West and Taunton Council in this regard.
4.3.6	8.4.16	Potential impacts - Adverse impacts on views at night	Due to the identified potential for the Proposed Development to have adverse effects on views at night, the ES should include an assessment of lighting impacts and details of the Applicant's lighting strategy.

4.4 Biodiversity

(Scoping Report Section 9)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.4.1	9.4.35	Invasive Non-Native Species (INNS)	It is proposed that INNS are scoped out according to the negligible value assigned to them (according to DMRB LA 108 – Biodiversity) and their limited presence across the Proposed Development. The Inspectorates agrees that this matter may be scoped out on this basis, but notes that further work will be undertaken to assess changes in the presence and distribution of INNS. Should the results of the further work indicate that there is potential for significant effects to occur the presence of INNS should be assessed. The Construction Environmental Management Plan (CEMP) submitted with the ES should outline the specific measures required to manage the two areas of giant hogweed identified in the Scoping Report.
4.4.2	9.4.20	Bracket's Coppice Special Area of Conservation (SAC) – operation and construction	Consideration of effects on this SAC is proposed to be scoped out on the basis that as the Proposed Development is outside the core sustenance zone (CSZ) for Bechstein's bats, for which Bracket's Coppice SAC is designated, it is considered unlikely that there would be any direct or indirect impact on bats associated with it. Given that the Bracket's Coppice SAC is located approximately 18.4km to the south east of the Proposed Development the Inspectorate agrees that this matter may be scoped out. However, the source of information on which the CSZ for Bechstein's bats was based should be included in the explanation provided in the ES of why the SAC was scoped out.
4.4.3	9.4.21	Thurlbear Woods and Quarrylands SSSI, Barrington Hill Meadows SSSI, Bickenhall Orchard LNR and	It is proposed that these sites are scoped out on the basis that no direct or indirect impact pathways are anticipated for habitats or species associated with these sites given the distance and limited connectivity to the Proposed Development.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		Children's Wood/Riverside Park LNR - operation and construction	On the basis of the information provided in the Scoping Report on the distance of these sites from the Proposed Development the Inspectorate agrees that these may be scoped out.
4.4.4	9.4.23	Air quality impacts on all LWSs beyond 300m - construction and operation.	It is proposed that these features are scoped out as it is considered that there are no impact pathways to them from the Proposed Development. The Inspectorate agrees that this is a reasonable approach and that these may be scoped out on this basis.

ID	Ref	Other points	Inspectorate's comments
4.4.5	9.3.2 & 9.3.12, Figures 9.1A & 9.1B	Baseline	Of the eight European sites identified, neither the Bracket's Coppice SAC nor the Beer and Quarry Caves SAC, identified as located within the wider 30km study area, are shown on the designated sites plan contained in Figures 9.1A. A number of the Ancient Woodland Inventory (AWI) sites identified in paragraph 9.3.12 do not appear to be included on Figure 9.2B. In addition, the individual site designations are not identified by name on the plans (although it is noted that hatching/a coloured boundary is used to denote the site type). Care should be taken to ensure that plans provided to support information contained in the ES clearly and accurately identify all of the relevant receptors and features considered therein.
4.4.6	9.3.5 – 9.3.6	Baseline	Although it is stated that there are 15 SSSIs within 200m of the ARN only 13 are subsequently identified. The information contained in the ES should be consistent throughout.
4.4.7	9.2.5, 9.2.8, 9.3.5 & Table 9-2	Study area	The study area for the assessment of effects on SSSIs is defined in paragraph 9.2.5 as 2km from the Proposed Development. In paragraph 9.2.8 the study area for the assessment of air quality

ID	Ref	Other points	Inspectorate's comments
			<p>effects on sensitive statutory designated sites is defined as within 200m of the ARN. Paragraph 9.3.5 states that there are two SSSIs within the 2km study area and 15 SSSIs within 200m of the ARN. However, only the two SSSIs within the 2km study area are included in Table 9-2 (Statutory designated sites within the study area), so the study area to be used for the assessment of effects on SSSIs is unclear. The study area must be clearly defined and encompass all receptors which could potentially experience significant effects, and an assessment of such should accordingly be provided in the ES.</p>
4.4.8	9.4.14	Potential impacts	<p>Consideration of the impacts of lighting on biodiversity features should include both the road infrastructure and the additional lighting generated by the predicted increase in vehicles on the A358 as a result of the Proposed Development.</p>
4.4.9	Table 9-5: Summary of impact, zones of influence and relevant ecological receptors	Potential impacts	<p>In respect of hydrological changes to surface and groundwater during construction and operation it is not explained why SPAs and Ramsar sites with hydrological connectivity are included but SACs are excluded, given that paragraph 9.3.3 indicates that the Severn Estuary SAC (and Ramsar site) is considered to be hydrologically linked to the Proposed Development.</p> <p>In relation to species disturbance from changes to noise, vibration, visual and light stimuli during construction and operation, SPAs and Ramsar sites designated for breeding or wintering birds are included, however SACs are excluded although bats are identified as a species that could be affected and four SACs designated for bats were identified (in paragraph 9.3.2) within the 30km study area, the nearest being 3.9km to the north west of the Proposed Development.</p> <p>The assessment must consider all receptors which could potentially experience significant effects arising from both the construction and operational phases of the Proposed Development, and it should be clear in the ES why particular sites/ habitats/ species previously</p>

ID	Ref	Other points	Inspectorate's comments
			identified as sensitive receptors have subsequently been excluded from the assessment.
4.4.10	9.5.2	Mitigation	<p>The Inspectorate notes the references to implementing mitigation measures to achieve Biodiversity Net Gain, which is welcomed. It should be made explicit in the ES which measures are designed to mitigate identified LSEs and which are intended to achieve BNG.</p> <p>The Applicant's attention is also drawn to the statement in Somerset West and Taunton Council's response that they have declared an ecological emergency, and will work with local, county, regional and national partners to increase wildlife habitats, green infrastructure and natural capital in their area. This should be recognised and addressed within the ES.</p>
4.4.11	9.5.3	Mitigation	The Inspectorate notes that protected species licences may be required from Natural England. The Applicant should identify any licences required and the stage that each licence application has reached at the time of the submission of the DCO application.

4.5 Geology and soils

(Scoping Report Section 10)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.5.1	10.4.2	Geology – construction	<p>The Scoping Report proposes to scope this matter out of the assessment on the basis that only one geological site of local importance has been identified within the region, which is 950m to the east of the Proposed Development site, and there are unlikely to be contamination linkages to this feature created during construction of the Proposed Development.</p> <p>The Inspectorate agrees that there are unlikely to be any significant effects on local geological features, given only one feature has been identified and its location, and that this matter may be scoped out.</p>
4.5.2	10.4.14	Geology – operation	<p>The Scoping Report proposes to scope this matter out of the assessment on the basis that no additional geological impacts are predicted during the operational phase. The Inspectorate notes that the potential for landslips has been identified within the vicinity of the Proposed Development and considers that the potential for future landslips to occur or affect the Proposed Development should be assessed for the operational phase.</p>
4.5.3	10.4.15	Operational impacts on soils and agricultural land	<p>The Scoping Report proposes to scope these matters out of the assessment. The Inspectorate agrees that operational impacts on agricultural land may be scoped out on the basis that the permanent loss of agricultural land would occur during the construction phase. Operational impacts on soils may be scoped out on the basis that the proposed best practice mitigation measures would be applied and a soil restoration plan would be implemented.</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.5.4	10.4.18	Operational impacts on surface water and groundwater from land contamination	The Scoping Report states that as potential contaminated land linkages would have been addressed during the construction phase, it is unlikely that there would be any additional impacts in relation to water receptors during the operational phase. The Inspectorate agrees that this matter may be scoped out, however it should be explained in the ES how the mitigation measures implemented during construction will ensure that contamination is prevented during operation.

ID	Ref	Other points	Inspectorate's comments
4.5.5	10.2.2	Study area	The Scoping Report states that the extent of the study area has been based on professional judgement. The Planning Inspectorate recommends that the study area is agreed with relevant statutory consultees where possible prior to the production of the ES.
4.5.6	10.3.27	Baseline - Assessment of the potential impact on groundwater and surface water	The ES should ensure that adequate cross-reference is provided between the groundwater/surface water assessment and the assessment of the potential effects of de-watering on palaeo-environmental and archaeological deposits contained in the Cultural Heritage chapter.

4.6 Material assets and waste

(Scoping Report Section 11)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.6.1	11.4.6 – 11.4.7	An assessment of materials and waste during the operational phase of the Proposed Development	The Scoping Report states that no significant maintenance activities would occur during the first year of operational activity and so no significant material use or waste generation would result. The Inspectorate agrees that this matter can be scoped out of the ES on the basis that it unlikely that significant effects would arise from the use of materials or generation of waste during the operational phase of the Proposed Development.
4.6.2	Table 11-10	Mineral sites and peat resources	<p>It is not clear whether mineral sites and peat resources are proposed to be scoped out of the assessment during construction and operation, however the Inspectorate has assumed that is the Applicant's intention.</p> <p>Paragraph 10.3.15 of the Scoping Report Geology and Soils chapter states that no recorded mineral sites have been identified in close proximity to the route and paragraph 11.3.26 of this chapter states that there are no peat resources located within the area of the Proposed Development. Providing that this is evidenced within the ES Material Assets and Waste chapter the Inspectorate agrees that these matters may be scoped out from all phases of the Proposed Development. Should peat deposits subsequently be identified during ground investigations the ES/CEMP should include mitigation measures to ensure the long term preservation of such deposits, where possible.</p>

ID	Ref	Other points	Inspectorate's comments
4.6.3	11.3.35– 11.3.37	Baseline - Inert landfill capacity	The Inspectorate notes that there are conflicting estimates of non-hazardous and inert waste capacity in Somerset from different sources. The Applicant should make every attempt to establish the most accurate figures in order to ensure that the assessment baseline and predicted impacts are robust.

4.7 Noise and vibration

(Scoping Report Section 12)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.7.1	12.2.7 & 12.4.9	Operational vibration	<p>The Scoping Report proposes that operational vibration is scoped out on the basis that, according to DMRB LA 111, a maintained road surface will be free of irregularities and so will not have the potential to give rise to significant adverse effects.</p> <p>The Inspectorate agrees that significant vibration effects are unlikely to arise during operation and that this matter can be scoped out.</p>

ID	Ref	Other points	Inspectorate's comments
4.7.2	12.5.6	Mitigation - Sound insulation of buildings	While noting that sound insulation is considered to be a last resort for noise mitigation, the Inspectorate advises that it should also be taken into account in the development of noise mitigation measures that sound insulation and improved glazing may not be applicable for older and/ or designated structures.
4.7.3	12.6.2	Likely significant effects - construction vibration	The Scoping Report states that there is potential for significant adverse construction vibration effects on human receptors in buildings and/ or resulting cosmetic damage to buildings from construction-induced vibration. It should also be reflected in the assessment that construction vibration has the potential to cause serious structural harm to buildings (especially older structures) in addition to cosmetic damage.
4.7.4	12.7.12	Methodology - predicted noise levels	The noise and vibration assessment should include figures mapping the predicted noise levels from the Proposed Development.

4.8 Population and health

(Scoping Report Section 13)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.8.1	N/A	N/A	No matters have been proposed to be scoped out of the assessment.

ID	Ref	Other points	Inspectorate's comments
4.8.2	13.2.2	Study area and methodology	It is stated that the proposed 500m buffer included in the land use and accessibility study area will be extended where likely effects are identified in the surrounding area, such as on the ARN, or where other impacts are identified. The methodology that will be used to determine the need to extend the study area should be explained in the ES.
4.8.3	13.3.46	Baseline	Yeovil AQMA is described as within 200m of the ARN, the study area for the air quality assessment. However, it is described as outside of the study area in the air quality chapter of the Scoping Report. Baseline information should be consistently reflected throughout the technical chapters of the ES, particularly where there are inter-relationships between different aspects, to ensure that each assessment considers all potential impacts which could give rise to a LSE.
4.8.4	13.3.50	Baseline	It is stated that baseline noise surveys will be undertaken when travel restrictions due to the COVID-19 pandemic are removed and the traffic flows are considered to be representative of the baseline conditions in the area. The ES should explain the methodology used to determine when traffic flows could be considered to be

ID	Ref	Other points	Inspectorate's comments
			representative. The ES should describe and justify any alternative approach used for data-gathering.
4.8.5	13.4.26	Potential impacts - operation	It is explained that there is potential for temporary access issues for some agricultural land holdings. A similar statement is made in relation to the construction phase of the Proposed Development. It is unclear whether this is a textual error or whether some temporary access impacts are anticipated during the operational phase in addition to the construction phase. This should be clarified in the ES and impacts assessed accordingly.

4.9 Road drainage and the water environment

(Scoping Report Section 14)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.9.1	14.3.17	Baseline - Sites of Special Scientific Interest	<p>The Scoping Report proposes that as the Thurlbear Wood and Quarrylands SSSI, Fivehead Woods and Meadow SSSI, and Fivehead Arable Field SSSI sites are not identified as water-dependent and are not hydraulically linked to the Proposed Development they will not be considered in the ES.</p> <p>The Planning Inspectorate agrees that these sites can be scoped out of the road drainage and water environment assessment.</p>

ID	Ref	Other points	Inspectorate's comments
4.9.2	14.3.22	Baseline - Flood Risk	The Inspectorate notes that the Proposed Development includes new river crossings and the alteration of existing crossings. The ES will need to include full descriptions of these and a robust assessment of potential impacts including hydrological modelling.
4.9.3	14.3.31	Baseline - existing road drainage	The Inspectorate considers that the ES baseline description should include mapping or figures setting out the location of the existing attenuation basins and controlled outlets.
4.9.4	14.4.4	Potential impacts - operation	The ES should contain detailed mapping of the proposed drainage scheme, including the location of Sustainable Drainage Systems (SUDS), attenuation ponds, lagoons, outfalls, and monitoring points. The Proposed Development also includes a diversion of the River Ding, with potential for significant hydrological, ecological, archaeological and other effects. Detailed designs and an assessment

ID	Ref	Other points	Inspectorate's comments
			of impacts arising from the new river channel should be included within the ES.

4.10 Climate change

(Scoping Report Section 15)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.10.1	15.4.5	Emissions associated with future decommissioning	The Inspectorate agrees that this matter may be scoped out on the basis that the Proposed Development would be unlikely to be decommissioned as once operational it would become part of the SRN.

ID	Ref	Other points	Inspectorate's comments
4.10.2	Section 15.3	Baseline	The Inspectorate notes that Somerset West and Taunton Council has declared a 'Climate Emergency', and has prepared a Carbon Neutrality and Climate Resilience (CNCR) Action Plan, which builds on the Somerset Climate Emergency Strategy. The Applicant is referred to the Somerset West and Taunton Council consultation response in this regard. The CNCR should be recognised and addressed in the ES.

4.11 Assessment of cumulative effects

(Scoping Report Section 16)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.11.1	N/A	N/A	No matters have been proposed to be scoped out at this stage of the assessment.

ID	Ref	Other points	Inspectorate's comments
4.11.2	16.3.1 & Appendix E	Stakeholder engagement and consultation	The Inspectorate notes that local planning authorities will continue to be consulted on the long and short list of other developments to be considered in the cumulative effects assessment, and that Appendix E of the Scoping Report contains the current provisional long list of other developments. The Applicant's attention is drawn to other developments that may also be relevant to the cumulative assessment that are highlighted in Somerset West and Taunton Council's consultation response.
4.11.3	16.4.13 & Table 16.2	Methodology - Zone of Influence	The Scoping Report outlines the proposed cumulative ZOIs, based on accepted industry guidance and relevant standards, for each of the environmental aspects to be considered in the ES. The ZOIs should be agreed with relevant statutory consultees, where possible.

5. INFORMATION SOURCES

5.0.1 The Inspectorate's National Infrastructure Planning website includes links to a range of advice regarding the making of applications and environmental procedures, these include:

- Pre-application prospectus⁵
- Planning Inspectorate advice notes⁶:
 - Advice Note Three: EIA Notification and Consultation;
 - Advice Note Four: Section 52: Obtaining information about interests in land (Planning Act 2008);
 - Advice Note Five: Section 53: Rights of Entry (Planning Act 2008);
 - Advice Note Seven: Environmental Impact Assessment: Process, Preliminary Environmental Information and Environmental Statements;
 - Advice Note Nine: Using the 'Rochdale Envelope';
 - Advice Note Ten: Habitats Regulations Assessment relevant to nationally significant infrastructure projects (includes discussion of Evidence Plan process);
 - Advice Note Twelve: Transboundary Impacts;
 - Advice Note Seventeen: Cumulative Effects Assessment; and
 - Advice Note Eighteen: The Water Framework Directive.

5.0.2 Applicants are also advised to review the list of information required to be submitted within an application for Development as set out in The Infrastructure Planning (Applications: Prescribed Forms and Procedures) Regulations 2009.

⁵ The Planning Inspectorate's pre-application services for applicants. Available from: <https://infrastructure.planninginspectorate.gov.uk/application-process/pre-application-service-for-applicants/>

⁶ The Planning Inspectorate's series of advice notes in relation to the Planning Act 2008 process. Available from: <https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/>

APPENDIX 1: CONSULTATION BODIES FORMALLY CONSULTED

TABLE A1: PRESCRIBED CONSULTATION BODIES⁷

SCHEDULE 1 DESCRIPTION	ORGANISATION
The Health and Safety Executive	Health and Safety Executive*
The National Health Service Commissioning Board	National Health Service England
The relevant Clinical Commissioning Group	NHS Somerset Clinical Commissioning Group
Natural England	Natural England*
The Historic Buildings and Monuments Commission for England	Historic England
The relevant fire and rescue authority	Devon and Somerset Fire and Rescue Service*
The relevant police and crime commissioner	Avon and Somerset Police and Crime Commissioner*
The relevant parish council(s) or, where the application relates to land [in] Wales or Scotland, the relevant community council	Stoke St Mary Parish Council*
	West Monkton Parish Council*
	Bickenhall Parish Council*
	West Hatch Parish Council*
	Hatch Beauchamp Parish Council*
	Thornfalcon Parish Council*
	Ruishton Parish Council*
	Ashill Parish Council*
	Donyatt Parish Council*
	Horton Parish Council*

⁷ Schedule 1 of The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (the 'APFP Regulations')

SCHEDULE 1 DESCRIPTION	ORGANISATION
	Ilminster Town Council*
	Broadway Parish Council*
	Beercrocombe Parish Council
The Environment Agency	The Environment Agency
The relevant Highways Authority	Somerset County Council
The relevant strategic highways company	Highways England South West
The relevant internal drainage board	Parrett Internal Drainage Board
Canal and River Trust	Canal and River Trust
Public Health England	Public Health England
The Crown Estate Commissioners	The Crown Estate
The Forestry Commission	The Forestry Commission (South West)
The Secretary of State for Defence	Ministry of Defence
The Office for Nuclear Regulation (the ONR)	The Office for Nuclear Regulation (the ONR)

* Due to an administrative error, these bodies were notified and consulted after other consultation bodies. Consequently responses received after the 42 day deadline will be forwarded to the Applicant. The Inspectorate expects the Applicant to have regard to such responses in accordance with paragraph 3.1.4.

TABLE A2: RELEVANT STATUTORY UNDERTAKERS⁸

STATUTORY UNDERTAKER	ORGANISATION
The relevant Clinical Commissioning Group	NHS Somerset Clinical Commissioning Group
The National Health Service Commissioning Board	National Health Service England

⁸ 'Statutory Undertaker' is defined in the APFP Regulations as having the same meaning as in Section 127 of the Planning Act 2008 (PA2008)

Scoping Opinion for
Proposed A358 Taunton to Southfields Dualling Scheme

STATUTORY UNDERTAKER	ORGANISATION
The relevant NHS Foundation Trust	Taunton and Somerset NHS Foundation Trust
	South Western Ambulance Service National Health Service Foundation Trust
Railways	Network Rail Infrastructure Ltd
	Highways England Historical Railways Estate
Canal or Inland Navigation Authorities	Canal and River Trust
Universal Service Provider	Royal Mail Group
Homes and Communities Agency	Homes England
The relevant Environment Agency	The Environment Agency
The relevant water and sewage undertaker	Wessex Water
The relevant public gas transporter	Cadent Gas Ltd
	Energy Assets Pipelines Ltd
	ES Pipelines Ltd
	ESP Networks Ltd
	ESP Connections Ltd
	Fulcrum Pipelines Ltd
	GTC Pipelines Ltd
	Harlaxton Gas Networks Ltd
	Independent Pipelines Ltd
	Indigo Pipelines Ltd
	Last Mile Gas Ltd
	Leep Gas Networks Ltd
	Murphy Gas Networks Ltd
National Grid Gas Plc	

STATUTORY UNDERTAKER	ORGANISATION
	Quadrant Pipelines Ltd
	Scotland Gas Networks Plc
	Southern Gas Networks Plc
	Wales and West Utilities Ltd
The relevant electricity generator with CPO Powers	Eclipse Power Networks
	Energy Assets Networks Ltd
	ESP Electricity Ltd
	Forbury Assets Ltd
	Fulcrum Electricity Assets Ltd
	Harlaxton Energy Networks Ltd
	Independent Power Networks Ltd
	Indigo Power Ltd
	Last Mile Electricity Ltd
	Leep Electricity Networks Ltd
	Murphy Power Distribution Ltd
	National Grid Electricity Transmission Plc
	The Electricity Network Company Ltd
	UK Power Distribution Ltd
	Utility Assets Ltd
	Vattenfall Networks Ltd
Western Power Distribution (South West) Plc	

TABLE A3: SECTION 43 LOCAL AUTHORITIES (FOR THE PURPOSES OF SECTION 42(1)(B))⁹

LOCAL AUTHORITY¹⁰
Bath and North East Somerset Council
Dorset Council
East Devon District Council
Exmoor National Park
Mendip District Council
North Devon Council
Mid-Devon District Council
Sedgemoor District Council
Somerset County Council
Somerset West and Taunton Council
South Somerset District Council
Wiltshire Council

TABLE A4: NON-PRESCRIBED CONSULTATION BODIES

ORGANISATION
West of England Combined Authority

⁹ Sections 43 and 42(B) of the PA2008

¹⁰ As defined in Section 43(3) of the PA2008

APPENDIX 2: RESPONDENTS TO CONSULTATION AND COPIES OF REPLIES

CONSULTATION BODIES WHO REPLIED BY THE STATUTORY DEADLINE:
Ashill Parish Council
Beercrocombe Parish Council
Broadway Parish Council
Cadent Gas Ltd
Canal and River Trust
Environment Agency
ESP Utilities Group Ltd
Hatch Beauchamp Parish Council
Health and Safety Executive
Historic England
Mid Devon District Council
Natural England
Neroche Parish Council (on behalf of Bickenhall Parish Council)
Network Rail
Office for Nuclear Regulation
Parrett Internal Drainage Board
Public Health England
Somerset West and Taunton Council
Stoke St Mary Parish Council
West Hatch Parish Council
West Monkton Parish Council
Wiltshire Council

Ashill Parish Council Response

A358 Taunton to Southfields Dualling Scheme

The Planning Inspectorate A358 Dualling Scheme

Statement

The Ashill residents and the Parish Council both strongly object to the way in which, during their lengthy planning process, Highways England have not fully considered at any point the many changes that have already been made, or are about to be made, by South Somerset District Council to Ashill village by approving more housing developments in the coming years along the main village road.

Currently, young families with children and pets are living in a very safe village environment, but if Highways England goes ahead with the planned junction arrangements along this new route, Ashill will be one of the villages that will be massively affected by a large increase in traffic movements through the small village. This will make the village road extremely busy, as it was before the current bypass was built.

Throughout their planning processes, Highways England have not given any consideration to the safety or the wellbeing of all who live in Ashill, or to the residents of surrounding villages also living along the A358.

It would be a sad day if it all went wrong and lives were lost.

Ashill Village

The long straight road through the village was one of the most dangerous stretches of road along the old A358, and we saw a number of people losing their lives in Ashill.

Once the bypass was built, it was not long before SSDC approved two developments along this road, and there are now a further **FOUR** waiting to be built, all including affordable homes for young families. The two most recent developments brought a big increase in cars being parked along the village road, and we are sure this will continue to increase when more houses are built.

The village also supports a lot of established wildlife, such as badgers, roe deer, foxes and hedgehogs, who regularly cross this road in various places, along this old road, Ashill has also been seeing a large increase in walkers, dog walkers, cyclists, and horse riders, and we do have an equestrian centre in Windmill Hill. Cats are also regularly seen crossing the road.

There will be an increase in children walking to school and to the playing field, and parents taking their children to school have to park along the main village road in mornings and afternoons.

During the winter, when the weather is bad, the School regularly uses the Village Hall for their PE (as they have no other facility) and children have to cross our road to get to the Hall. The crossing is in a blind spot area and already quite dangerous, so with the additional volume of traffic it would make it even more dangerous for them to cross over.

The winter also brings another dangerous condition on the road through Ashill, the village is on a hill and the road easily floods, and if the temperatures are very low it freezes over. Ashill is not on the Council's gritting programme, so we see a number of accidents every year, especially when parents are taking their children to school early in the morning. If additional traffic has to travel along this road, because of the new A358 junction arrangement, it will only make it more dangerous for everyone.

A358 Dualling Scheme Ashill Village Essential Junction Change.

Ashill / Ilton New Junction

- The Parish Council fully supports the siting of the new junction for Ashill and Ilton, as it is essential for the commercial vehicle movements to and from the Ilton Business Parks.
- The one question still to be answered is: Will Thickthorn Lane be closed off from this junction? If so, all residents from Thickthorne and Southtown, will face up to 7 miles round trip to access the A 358, compared to currently less than 1 mile.

Stewley Planned Flyover by Ashill

- The Parish Council fully supports the siting of the planned flyover from Stewley to the old A358 even though it will increase the volume of traffic through the village.
- Traffic wanting to travel to Taunton / M5 Motorway from the same area will now have to travel along part of the old A358 to the Hatch Beauchamp flyover, then through Hatch Beauchamp to the new junction at Thornfalcon. This does not affect Ashill but will possibly increase the traffic movement through Hatch Beauchamp. Alternatively they might travel through Ashill and pick up the new Ashill / Ilton junction for Taunton / M5.

Hatch Beauchamp Planned Flyover

- This planned flyover is the one which will cause a huge increase in traffic movement through the village of Ashill and horrendous difficulties for other villages in the surrounding area. I am sure the other Parish Councils will be sending a strong response to this major concern.
- The planned flyover, from the old A358 into Hatch Beauchamp **MUST be changed** to a **flyover with ON/OFF slip road junction**, to make sure traffic movements around the very small, dangerous roads (roads which are also in poor condition) are kept to a minimum and safe for all those who live along them and cannot avoid having to use them.
- The addition of this new slip road junction would prevent residents from Hatch Beauchamp, Beercrocombe, Bickenhall, Windmill Hill, Wood / Wood Road, Kenny, Stewley and Capland having to pass through Ashill village when accessing the A358 in both directions. This would be safer for these road users and help to minimise the tremendous impact that will be imposed on Ashill village residents due to other unavoidable additional traffic. *(Total population of these areas approx. 1350)*
- In the event of hold ups and tailbacks from Southfield roundabout the addition of this additional junction would allow local traffic to ease the congestion on the A358.
- If **Highways England** are not prepared to change this flyover to a **flyover with ON/OFF slip roads**, then the potential for additional vehicle movements through Ashill will be massive.
- The Parish Council cannot see people living in the above mentioned areas travelling all the way to the new junction at Thornfalcon and then travelling back along the new A358 to Ilminster / the A303.

The shortest route for them would be through Ashill.

Summing-up

The Ashill Parish Council and the residents of Ashill are extremely concerned that Highways England have not really got to grips with the local areas, and the travel movements around all the villages that actually take place using the current A358 junctions. This has been quite clearly shown throughout their planning process from the lack of, what we see as very important, information showing how we are expected to change our way of living, by closing all our local junctions to accommodate this A358 Dualling scheme.

With the A358 contract now awarded, we should not still be having to ask questions about:

Public Footpath Arrangements for Ashill,

Farmers' road usage

Horse riders/Equestrian users crossing the new A358

We have not received answers as to how the above 3 issues are to be addressed.

The critical points we would like to make are:

- Have Highways England consulted with all the Emergency Services with the new junction arrangement being proposed?
- The villages along this upgraded A358 are going to have put up with a large amount of extra traffic using a lot more of our unsuitable and dangerous roads to live their lives if the ON/OFF slip road at Hatch Beauchamp is not approved.
- What other studies have been carried out to make sure the wildlife living around these roads are not further affected by the increase of traffic movements around their established habitats?
- No other village along the route of the proposed new dual carriageway will suffer anything close to the volume of increased traffic movement that Ashill will be exposed to.

We appreciate the inconvenience to road users having to travel a few extra miles up to 5 times a week. However the residents of Ashill are faced with a considerable increase in traffic 24 hours a day if this recommendation is not implemented.

We hope the matters we are raising are taken seriously by yourself and you are able to make Highways England reconsider changing the Hatch Beauchamp flyover to an ON/OFF slip road, which we feel would greatly reduce the above mentioned traffic problems.

Thank You

Peter Lang
Ashill Parish Council Chairman.

28th April 2021

██████████, EIA Advisor
The Planning Inspectorate
Environmental Services, Operations
Temple Quay House
2 The Square
Bristol, BS1 6PN

Your Ref.	TR010061-000008
Telephone	██████████
Email	██
Date	22 April 2021

A358 Taunton to Southfields Dualling Scheme
Environmental Impact Assessment Scoping Report
Beercrocombe Parish Council's Opinion

1. The EIA does not reference two NPSNN road safety policies nor fulfils the requirements of these policies. The applicable NPSNN policies are:

4.64

The applicant should be able to demonstrate that their scheme is consistent with the Highways Agency's Safety Framework for the Strategic Road Network and with the national Strategic Framework for Road Safety. Applicants will wish to show that they have taken all steps that are reasonably required to:

- . minimise the risk of death and injury arising from their development;*
- . contribute to an overall reduction in road casualties;*
- . contribute to an overall reduction in the number of unplanned incidents; and*
- . contribute to improvements in road safety for walkers and cyclists.*

5.202

Development of national networks can have a variety of impacts on the surrounding transport infrastructure including connecting transport networks. Impacts may include economic, social and environmental effects. The consideration and mitigation of transport impacts is an essential part of Government's wider policy objectives for sustainable development.

2. As part of the local community we are extremely concerned by the scheme's proposal to close all direct access to the dualled A358 for the 5 mile section between the Ashill and Mattock's Tree Green junctions. The EIA records at paragraph 3.2.6 that HE took the decision to close all 11 local road links primarily as a cost cutting measure, without complete analysis of the suitability of the local network to handle the volume and types of traffic and the impact this traffic would have on the road safety of walkers, cyclists and horse riders (WCH). This extreme decision will have a serious negative impact on road safety, general well being and health of the local area and discourage the activities of walkers, cyclists and horse riders. The Applicant has not fulfilled the NPSNN 5.206 requirement to include within the EIA a full description of the impact of their decisions with mitigating commitments.

3. The scheme proposes local traffic divert through rural roads to access the A358 at either the Ashill or Mattock's Tree Green junctions necessitating long journeys through

narrow and often windy country lanes. Moreover, to reach either of these access points most local traffic will be funnelled through the villages of Hatch Beauchamp and Ashill and each will experience a large increase in traffic, which will inevitably have a negative impact on road safety within the villages. Both villages had bypasses built in the 1980s and 90s, which the scheme incorporates into the dualled A358, yet the implication of closing all local links will be to return the villages to traffic volumes that precipitated the need for a bypass.

4. The EIA notes at paragraph 13.3.20 that although walkers, cyclists and horse riders are not prohibited from using the A358, the current road is not suitable for this type of use due to traffic volumes and speed. Fortunately, the local rural roads are ideal for WCH users, which have increased following COVID restrictions. Local traffic currently joins the A358 at the numerous connections and consequently motorised traffic on the rural network is minimised. Forcing local traffic to remain within the local network for long distances will undoubtedly cause conflict with WCH users. Traffic volume and incompatibility will lead to a rise in accidents and incidents within the local rural road network and discourage WCH from using a valuable local resource. This outcome directly opposes the Government's wider policy objectives for sustainable development.

5. HE's analysis of the current deficiencies of the A358 at paragraph 2.1.1 avoids the primary reason for delays, which are the inadequacies of the roundabouts at the west and east ends of the A358. Junction 25 to the M5 and the approach through Henlade is the primary cause for delays heading west, as is Southfields roundabout and Ilminster bypass for easterly traffic. These two bottlenecks are the cause of traffic congestion along the A358. East of Thornfalcon traffic flow is never compromised by local traffic joining and HE's own data recorded at paragraph 13.3.55 proves that the current A358 with all the current links has a considerably lower accident rate than the national average (110 versus 171 accidents per billion vehicle kilometres).

6. As the scheme has insufficient funding for incorporating free flowing junctions at both ends of the A358, HE's analysis concentrates on the second order deficiencies along the A358. The scheme's proposals for improvement appear to follow motorway design specifications for maximum speed of through traffic from one roundabout to the other, with a consequential disproportionate negative impact to the local rural communities. The loss of historic accessibility to the A358 necessitating long diversion through windy and narrow lanes, incompatibility of traffic types (cars, vans, lorries and agricultural vehicles) with each other and WCH uses will increase mental and physical stress on local communities. School runs will become more stressful. Businesses will be handicapped. Community severance will increase. The scheme does not consider in any depth these effects nor offers any mitigation of substance.

7. With government approval of the Sparkford to Ilchester dualling scheme local communities now have a template to compare to the proposal for the A358. Both schemes originated from the government's Road Investment Strategy 2015-2020 published in 2014 and both are part of the long-term commitment to creating a new Expressway to the Southwest. However, the designs of the two schemes are different in several ways. Whereas the Sparkford to Ilchester scheme has free flowing connections to the existing A303, the A358 scheme terminates at existing roundabouts that will undergo only marginal improvements. The Sparkford to Ilchester scheme has also maintained connectivity for local traffic by including standard trunk road at-grade junctions at Downhead and Camel Cross approximately halfway along the 3-mile long

scheme. The EIA states at paragraph 2.4.2 that the A358 scheme is to be built to the same trunk road standards. However, the overwhelming priority given to through traffic and seasonal holiday traffic has produced decisions on local access to follow motorway specifications, with the consequential easy dismissal of the need for local connectivity between the Ashill and Mattock's Tree Green junctions.

8. We absolutely disagree with the assertion in paragraph 3.3.19 that the scheme will cause less disruption to existing patterns of movement for local communities. Local concerns regarding the loss of existing links to the A358 have been expressed at all opportunities including the Highways England sponsored Community Liaison Forums. We have proposed solutions to resolve these concerns but to date these concerns and our proposals have been ignored. The scheme development is now at Stage 3 – the last stage - when the Preferred Route is developed to the Preliminary Design level to allow planning consent applications to be made. We are deeply concerned that reversing, or even amending, decisions made in Stage 2 that led to the Preferred Route Announcement will not be achieved through local appeals and we look to the Inspectorate to convey these concerns to Government and to Highways England.

9. Improvements can be made that would mitigate many of our concerns. We also believe savings can be made in the current proposal to pay for changes we want. These are:

a. The new connection at Mattock's Tree Green Junction to the existing A358 and Henlade is unwarranted. The current traffic light controlled junction at Thornfalcon would suffice with the additional link to roundabout north. The link from Hatch Beauchamp Village road should go to the Thornfalcon junction as EIA Figure 2.1 indicates. Maintaining this junction as existing would save money and improve movement of local traffic and avoid severance.

b. The West Hatch Lane link to Somerset Progressive School and adjacent business park is impractical as the diversionary route proposed is some 3 miles distance along very narrow windy lanes. The link should be from the school/business park direct to Mattock's Tree Green roundabout south. Rerouting this link should be cost neutral.

c. Griffin Lane is too narrow, windy and hilly to be used as a major local road. WCH use this lane extensively so the scheme's proposal for greater use of this lane by local motorised traffic is dangerous.

d. Bickenhall Lane is a busy local route (over 500 AADT) favoured by farm traffic and lorries. We propose this lane is kept open by extending the planned service road from Ashill to Hatch Beauchamp overbridge to Bickenhall Lane. We also propose that a slip road access be provided onto the southern carriageway at the western end of this extended service road. Offset savings will be made by not requiring suitability assessments of the diversionary routes proposed and the remediation that would be required on these routes to make them acceptable.

e. The Hatch Beauchamp overbridge is considered to be unnecessarily complicated and sited at the most difficult and environmentally intrusive position. We believe the overbridge should be sited about 200 metres west, where the adjacent ground is higher, dryer and more stable, and aligned with and connected to Staple Fitzpaine Road (locally called Batten's Green Road). The overbridge

should span the dual carriageway and the extended service road. The existing Batten's Green Road junction with the A358, which has been perfectly acceptable to date, should remain connected to the service road, dispensing with the scheme's expensive link Hatch Beauchamp Road East.

f. HE traffic data for Village Road exceeds the criteria documented at Table 5.18a of CD123 Revision 2 for provision of slip road access. We therefore propose that the current Village Road from Hatch Beauchamp be modified to connect it to the northern carriageway via converging and diverging slip roads.

g. Although EIA Figure 2.1 shows Capland Lane connected to Village Road by a link, other briefs have not shown this connection. The link is a necessary mitigation, as Capland Lane west is the only flood free access to properties along Capland Lane and the northern part of Stewley Lane.

h. The Kenny overbridge is too complicated and therefore expensive for the requirement. A simple straight connection from Stewley Lane to Wood Road should be possible in spite of recent development at Stewley Cross. The existing roads at Stewley Cross should remain, as again they are perfectly satisfactory. We propose that the junction with the existing A358 remains and becomes the eastern extent of the service road. We also propose a slip road access from the southern carriageway onto the service road at this point.

i. For clarity and emphasis, we propose slip roads off and on the southern dual carriageway at the eastern and western ends of the service road. We also propose slip road access off and on the northern carriageway at Village Road, Hatch Beauchamp. These additional access points are low cost solutions to provide satisfactory connectivity to the dual carriageway by the local network. If provided, traffic through Ashill and Hatch Beauchamp would be greatly reduced as would the distances driven by users of the local rural network. Conflict with WCH users would be reduced, damage to the environment would be reduced as would the mental and physical stress felt by local communities.

j. The link to Ashill sewage works should be replaced by a simple works entrance off and on the northern carriageway, as is done in many locations on the national trunk network.

k. The EIA gives little information about the upgrade to Cope Lane and we question whether the depicted route will be able to cope with the level of traffic heading to Ilton.

10. To respond to this EIA local parishes have combined knowledge in order to provide a useful critique to the current scheme proposal together with proposals for mitigation. We realise that we do not hold all the necessary technical information, but our opinions are based on local knowledge, local concerns, local practices and likely behavioural responses. In these areas our knowledge exceeds that of HE.

Beercrocombe Parish Council
Robert Burrough
Councillor

From: [REDACTED]
To: [REDACTED]
Subject: T2SF - A358 Taunton to Southfields Dualling Scheme - EIA Scoping Notification and Consultation
Date: 25 April 2021 11:23:08

Dear Ms Down.

I refer to your email of 9 April.

In the time available, Broadway Parish Council has been unable to consider the EIA formally or in detail. However there are 3 issues which our Environmental Warden has drawn to our attention and which the Council believes should be taken into account.

1. The first is the 2 references to the need for site compounds at points along the route. In particular:

2.5.5 A scheme of this size requires a main site compound along with several, smaller, satellite compounds at strategic work locations along the route. Potential locations for the main site compound at the northern end of the proposed scheme adjacent to junction 25 of the M5 are being considered.

2.5.6 Satellite compounds are envisaged to facilitate works at the major junctions at Mattock's Tree Green and Ashill. Small temporary office and laydown areas will be required at bridge locations and the tie-ins to the new Nexus 25 roundabout and A303 Southfields roundabout.

Although the currently proposed preferred route crosses only a relatively small part of Broadway Parish, there is potential for site compounds to intrude further into the pastures either side of the line in the parish. Environmental assessments should therefore take account of the potentially wider impact on the environment in Broadway.

2. The Council is concerned at the potential impact of haul routes on the environment in Broadway. The reference here is:

2.5.7 To reduce the amount of construction traffic using the existing road network, haul routes will be created. Where practicable, these are likely to be routed along the new mainline route, however, where this is not practicable, additional temporary land use may be required adjacent to the works.

The currently preferred route along land in Broadway parish is along the existing line of the A358. Any haul routes to serve the construction of the new route would therefore have to be on as yet unidentified land in Broadway parish. As with the first point, therefore, the Council is concerned that the environmental assessment should take account of the wider impact of this on the village.

3. The Council was concerned to read a reference to the impact on the church cross. The reference here is:

7.4.2 The Cross in St Aldhelm and St Eadburga churchyard, a scheduled monument (NHLE 1017250), has the potential to be adversely affected as a result of changes to its setting beginning during construction but continuing through operation.

The Council is concerned at the singularity of referring to the church cross without also mentioning the Grade 1 listed church itself. It is also concerned at the uncertainty created by Highways England's focus on a scheduled monument on the western side of the church furthest away from the preferred route. If this implies that the impact of any works associated with the construction of the route would extend as far as the western side of the church, it would clearly be necessary to ensure that any environmental impact assessment extended as far as the built-up part of the village.

The Parish Council is still considering these papers and will convey any further comments it has as soon as it can.

Regards

Peter Gregory

Chairman, Broadway Parish Council

From: [REDACTED]
To: [A358 Taunton to Southfields](#)
Subject: Development Consent for the A358 Taunton to Southfields Dualling Scheme
Date: 08 April 2021 16:07:25

Good afternoon,

This development is outside of the Cadent network and therefore Cadent have no comments on this DCO.

Kind regards
Dean

Dean Hopewell
Land and Consents Officer
Capital Delivery

Cadent

[REDACTED] [@cadentgas.com](mailto:[REDACTED]@cadentgas.com)

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From: [REDACTED]
To: [A358 Taunton to Southfields](#)
Subject: T2SF - A358 Taunton to Southfields Dualling Scheme - EIA Scoping Notification and Consultation
Date: 09 April 2021 15:20:55
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.wmz](#)
[image006.png](#)
[image008.png](#)
[image009.png](#)
[image007.png](#)

Dear Sir

A358 Taunton Southfields dualling Scheme

Waterway: Bridgwater & Taunton Canal

Thank you for your consultation.

We are the charity who look after and bring to life 2000 miles of canals & rivers. Our waterways contribute to the health and wellbeing of local communities and economies, creating attractive and connected places to live, work, volunteer and spend leisure time. These historic, natural and cultural assets form part of the strategic and local green-blue infrastructure network, linking urban and rural communities as well as habitats. By caring for our waterways and promoting their use we believe we can improve the wellbeing of our nation. The Trust is a prescribed consultee in the Nationally Significant Infrastructure Projects (NSIPs) process and you have identified the Trust as a consultee in relation to this scoping Opinion..

The Trust has reviewed the details and it is unlikely that the proposal will have any impact on our waterway. We have **no** comment to make at this time.

Please do not hesitate to contact me with any queries you may have.

Yours sincerely,

Jane Hennell MRTPI

Area Planner

[REDACTED]

<https://canalrivertrust.org.uk/specialist-teams/planning-and-design>

Gloucester Waterways Museum, Llanthony Warehouse, The Docks, Gloucester, GL1 2EH



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Cadw mewn cysylltiad

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Mae Glandwr Cymru yn gwmni cyfyngedig drwy warant a gofrestrwyd yng Nghymru a Lloegr gyda rhif cwmni 7807276 a rhif elusen gofrestredig 1146792. Swyddfa gofrestredig: First Floor North, Station House, 500 Elder Gate, Milton Keynes MK9 1BB.

Alison Down
Planning Inspectorate
Environmental Services
Operations
Temple Quay House
2 The Square
Bristol,
BS1 6PN

Our ref: WX/2021/135149/01-L01
Your ref: TR010061-000008
Date: 23 April 2021

Dear Ms Down

EIA SCOPING OPINION - A358 HIGHWAY DUALLING SCHEME, M5 TAUNTON TO A303 SOUTHFIELDS ROUNDABOUT

Thank you for your consultation regarding the above.

Following a detailed review, the Environment Agency considers that the submitted documentation provides a comprehensive assessment of the environmental setting and potential effects of the proposed scheme. The identified assessment methodologies, together with the mitigation and enhancement proposals, have been noted.

Notwithstanding the proposed comprehensive scope of the EIA, as detailed, the following comments are provided to ensure the proposed assessment incorporates additional specific provisions, in respect of issues pertinent to the Agency's interests:

Road drainage and the water environment

14.3.31

The Agency would request mapping of the outlined attenuation basins and controlled outlets. Additionally, a monitoring strategy assessing how the current drainage arrangements are impacting on the environment would be beneficial.

14.4.4

The Agency would welcome the mapping associated with the proposed new drainage scheme, including the location of SUDS/attenuation/ lagoons/outfalls and appropriate monitoring points.

Additionally, the following comments must be noted:

- Agency discharge permits will be required for all temporary discharges (>3 months) during construction
- The Agency's Regulatory Position Statement (RPS) on 'Temporary dewatering from excavations to surface water' can be used for discharges (< 3 months), provided all conditions of the RPS are met.
- All permanent monitoring settlement/attenuation lagoons must have safe and accessible monitoring points, either at the outlet to a watercourse or at the outlet from the settlement/attenuation lagoon. This also applies to any temporary discharge locations.
- Where a connection to the foul sewerage system is not available, foul drainage from any compound areas, should be contained in a sealed tank for off-site disposal, in an approved manner. Where this arrangement is not practicable, any septic tank discharge to a soakaway or treatment plant discharge to a watercourse, must meet the General Binding Rules. If this is not possible, an Agency discharge permit will be required, prior to any discharge.
- Any pollution events will need to be reported immediately using the Agency's pollution incident hotline (0800 80 70 60).

Flood Risk Assessment

With regard to the requisite Flood Risk Assessment (FRA), the Agency will require the inclusion of a detailed assessment of the proposed new river crossings and those crossings where culverts will be extended, as a result of the proposed scheme. The proposed works must not result in an increase in flood risk.

Additionally, the Agency must advise that serious consideration is given to the provision of overall betterment by increasing upstream storage and contributing to the reduction in downstream flood risk.

The FRA may be included as an integral element of the EIA, or submitted as a separate document.

Groundwater

The Agency would highlight the requirement to fully assess any potential risks to the two licensed abstractions detailed hereunder, which are both groundwater fed supplies;

- 16/52/005/G/109 at NGR: ST26902440
- 16/52/005/G/564 at NGR: ST27932233

Biodiversity

The Agency fully supports the mitigation measures detailed in 9.5 (Design, mitigation and enhancement measures) and would encourage that these are adopted within the detailed design.

The Agency must encourage the inclusion of Biodiversity Net Gain throughout the proposed scheme, with an emphasis of increasing connectivity and habitat functionality to surrounding habitats. The Lawton Principle should be adopted and opportunities sought to connect habitats created within the scheme, to wider partnership projects. Accordingly, the project team is advised to work with the Somerset Local Nature Partnership, to maximise opportunities within and beyond the scheme footprint.

Species and habitat protection is emphasised and the commitment to avoidance of impacts on features of interest is supported. Where this is not possible the safeguards suggested 9.5.1 and 9.5.2 are also supported. Further to the additional measures stated in 9.5.3, where impacts on watercourses are unavoidable, design options should include further measures to protect and enhance the aquatic environment. Where possible, this should include softer landscaping options, which encourage natural processes and result in enhanced habitat features for target species, including: water vole, otter, bats and kingfisher. Riparian habitats should include nectar rich planting, which provide a year round source of food and enhanced habitat connectivity for pollinating insects. Drainage ponds and ditches should also be designed to provide habitat for small mammals and invertebrates, with bank profiles which encourage colonisation by water voles.

Appendix C (Species survey scope and methodology)

It is stated the habitat survey methodology for water vole is based on Strachan et al (2011). It must be noted this guidance has been superseded by The Water Vole Mitigation Handbook, Dean et al (2016). The approach to surveys for major road schemes is not as stated in Appendix 3 i.e. much longer surveys are now recommended as best practice. The new guidance should therefore be followed to establish water vole occupancy on the watercourses affected by the proposed scheme. The suggested 2021 follow up survey of 100m upstream and downstream of each crossing is therefore considered inadequate. This is particularly relevant where the River Ding will be diverted and a more significant length of the watercourse will be impacted.

Piped culverts have been proposed for use where the A358 passes over minor watercourses. These watercourses are still likely to contain populations of minor fish species, together with bullhead and European eels. The applicant must ensure the culverts are installed at or below bed level to prevent them from becoming a barrier to fish migration.

It is indicated that underpasses are to be used for larger watercourses. Clarification must be provided in respect of whether the footings/wingwalls will be located within the watercourse or further up the riverbanks. The Agency must advise that it would be preferable to site them away from the watercourse, to prevent the removal of natural riverbank sections. Underpass footings/wingwalls located within the watercourses are likely to result in erosion and will require long term maintenance, to reinforce the banks. Erosion will result in additional siltation and deposition downstream of the structures, which is likely to smother gravels and have a negative impact on salmonid spawning grounds.

The proposed diversion of the River Ding has the potential to result in a significant effect and therefore, detailed designs of the new river channel will be required. The design should ensure the diverted stretch of the river has appropriate habitat for fish species and not impede fish passage at any point. The riverbanks will also need to be suitably vegetated, to provide habitat for fish and minimise erosion.

Should you wish to discuss any specific issues, please use the contact details hereunder.

Yours sincerely

Dave Pring
Planning Specialist

Direct e-mail [REDACTED]@environment-agency.gov.uk

From: [ESP Utilities Group Ltd](#)
To: [A358 Taunton to Southfields](#)
Subject: Your Reference: TR010061-000008 Our Reference: PE156587. Plant Not Affected Notice from ES Pipelines
Date: 13 April 2021 11:28:48

A358 Dualling
Planning Inspectorate

13 April 2021

Reference: TR010061-000008

Dear Sir/Madam,

Thank you for your recent plant enquiry at: Bickenhall Lane, Taunton, TA3 6TN.

I can confirm that ESP Utilities Group Ltd has no gas or electricity apparatus in the vicinity of this site address and will not be affected by your proposed works.

ESP Utilities Group Ltd are continually laying new gas and electricity networks and this notification is valid for 90 days from the date of this letter. If your proposed works start after this period of time, please re-submit your enquiry.

Important Notice

Please be advised that any enquiries for ESP Connections Ltd, formerly known as British Gas Connections Ltd, should be sent directly to us at the address shown above or alternatively you can email us at: PlantResponses@espug.com

ESP have provided you with all the information we have to date however, there may be inaccuracies or delays in data collection and digitisation caused by a range of practical and unforeseeable reasons and as such, we recommend the following steps are taken as a minimum before work is commenced that involves the opening of any ground and reference made to HSG47 (Avoiding danger from underground services).

A. Plans are consulted and marked up on site

B. The use of a suitable and sufficient device to locate underground utilities before digging (for example the C.A.T and Genny)

C. Trial holes are dug to expose any marked up or traced utilities in the ground

D. If no utilities are shown on any plans and no trace is received using a suitable and sufficient device, trial holes are dug nonetheless using hand tools at the

location or at regular intervals along the location that the work is being carried out depending on the length of excavation work being undertaken
E. All location work is carried out by individuals with sufficient experience and technical knowledge who may choose to control this activity under a Safe System Of Work

Yours faithfully,

Plant Protection Team
ESP Utilities Group Ltd



Bluebird House
Mole Business Park
Leatherhead
KT22 7BA

☎ 01372 587500 📠 01372 377996

<http://www.espug.com>

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Comments on Highway England's Scoping Report for Environmental Impact Assessment of the proposed A358 dualling from Hatch Beauchamp Parish Council.

Hatch Beauchamp Parish Council (HBPC) thanks the Planning Inspectorate and Highways England (HE) for the opportunity to comment on the Scoping Report for the Environmental Impact Study (EIA).

Below are our comments on the actual document and its contents. Our comments are in red. Following on from our comments you will find our suggestions and arguments in relation to the scheme and its environmental impact followed by comments from local residents and other research data.

At this point we would like it to be noted that overall, we are extremely disappointed with the lack of detail contained within the document, particularly in relation to the community of Hatch Beauchamp. There are major omissions in relation to the businesses/services within the village and it is clear that HE have not even conducted adequate desk-top research let alone made any sort of physical visit to the area to understand the daily life of the village. Furthermore, numerous assumptions have been made which bear no resemblance to the reality or facts for the village. We, as the Parish Council, feel we need to remind HE that you are dealing with people and their everyday lives. At the House of Commons Transport Committee of 17 March 2021, it was stated:

One of the levers that could be hardwired into the system as part of Project Speed, so that when infrastructure happens, rightly or wrongly, is that there is clear accountability in place for local decision making so that these projects are built with and not to people.

Furthermore, given the majority of the data was already historic before the onset of the pandemic we would expect, in line with the comments expressed by Lord Hammond at the same Transport Committee, a full and thorough review of all data in a post Covid world.

Comments on EIA document

1.2.6 The existing road has many local roads and private accesses joining directly with it and it is regularly congested and is frustrating for people travelling to school and work. As a result, many drivers/road users try to avoid the traffic by diverting onto smaller local roads which increases the level of traffic in surrounding villages. **That is an assumption and many villages would dispute that.**

1.2.7 This proposed scheme proposes to upgrade the A358 to high-quality dual carriageway between Southfields Roundabout on the A303 and the M5 at Taunton to address the traffic issues and long delays currently experienced along the route. **The traffic issues are at either end of A358. It is false to say there are long delays along the route, the road runs smoothly most of the time on a daily basis with traffic flowing up to 60mph. The only issues are the approach to Southfields roundabout joining the A303 where the traffic on the A303 is the issue – traffic joining the A358 from A303 is free flowing. The other issue lies at the Henlade end when the dual section moves to single lane at the same time becoming 30mph zone plus roundabout at M5.**

1.4.1 The government recognises in the appraisal of sustainability accompanying the NPSNN that some developments will have some adverse local impacts on noise, emissions, landscape/visual amenity, biodiversity, cultural heritage and water resources. The significance of these effects and the effectiveness of mitigation is uncertain at the strategic and non locational specific level of the NPSNN. Therefore, whilst applicants should deliver developments in accordance with government policy and in an environmentally sensitive way, including considering opportunities to deliver environmental benefits, *some adverse local effects of development may remain. Why is that acceptable?*

1.4.4 The NPPF seeks to achieve sustainable development through three overarching objectives which are interdependent but need to be pursued in mutually supportive ways. The three objectives comprise: · an economic objective - to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and identifying and coordinating the provision of infrastructure. *The local economy in HB will be adversely impacted.*

· a social objective - to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; including a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being. *This scheme will reduce open spaces and destroy existing local communities.*

· an environmental objective - to contribute to protecting and enhancing our natural, built and historic environment; including the effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy. *You will be destroying medieval sites.*

2.2.1 The project objective is to create a dual carriageway link from the M5 at Taunton to the A303, incorporating upgraded stretches of the existing road into the strategic road network, where appropriate, which would address the traffic issues and long delays currently experienced along the route, and the negative impact this has on the south west economy. *'Where appropriate' is key, where is the proof of negative impact on economy particularly as the road is under 9 miles long? The traffic issues are at either end of A358. It is false to say there are long delays along the route, the road runs smoothly most of the time on a daily basis with traffic flowing up to 60mph. The only issues are the approach to Southfields roundabout joining the A303 where the traffic on the A303 is the issue – traffic joining the A358 from A303 is free flowing. The other issue lies at the Henlade end when the dual section moves to single lane at the same time becoming 30mph zone plus roundabout at M5.*

2.2.3 In order to deliver this ambition, the following scheme objectives have been set by Highways England: · Support economic growth: facilitate growth in jobs and housing by providing a free-flowing and reliable connection between the south east and the south west. *The connection is already free flowing and no roads are ever 100% reliable – look at the M25. The economic survey was carried out in 2012 using 2009 data with only a response rate of under 3%. Local businesses were not surveyed and the methodology used is questionable.*

· Resilience: to improve journey time reliability and resilience and provide extra capacity to make it easier to manage traffic when incidents occur. *See above comment.*

· Connectivity: to improve the connectivity of the south west to the rest of the UK and improve business and growth prospects. *The plans will severely reduce local connectivity impacting heavily on local businesses already operating in the area.*

· Local communities: to reduce community severance and promote opportunities for improving their quality of life. *The plans do not demonstrate any reduction in community severance in fact it will only achieve the polar opposite effect.*

- Safety: to improve safety for all, including pedestrians, cyclists and other nonmotorised users. **The scheme will fundamentally and significantly reduce safety for NMU by pushing traffic on to single track lanes.**
- Environment: to avoid unacceptable impacts on the surrounding landscape, natural historic environment while exploring opportunities for enhancement. **Creating 8m high flyovers directly in front of residential properties is unacceptable impact for a rural environment.**
- Capacity: to reduce delays and queues that occur during peak hours and at seasonal times of the year. **Local residents will be heavily penalised on a daily basis by making significant detours yet preference is being given to holiday makers who travel the route twice a year. Peak hour traffic will change fundamentally due to change in working landscape post-Covid and analysis of these working patterns needs to be included in any decision. Forecasts state a minimum 40% reduction in office based working.**

2.3.5 Along the A358 motorists currently experience high traffic, primarily because, for many sections of the route the traffic demand is above that for which they were designed. This is exacerbated in the summer when there is typically 30% growth in traffic along the A303 corridor from holiday traffic. There are also capacity issues at M5 junction 25 in the morning, mainly on the A358 westbound approach. **Traffic is free flowing in the summer except at Southfields where traffic is joining single carriageway of A303 heading towards London. Morning traffic will be altered post Covid plus the recent works done to Junction 25.**

2.3.8 The existing A358 passes through a largely rural area between Taunton and Ilminster, with various agricultural land uses and villages, hamlets and scattered farms and individual dwellings.

2.3.9 The A358 provides direct access to local communities (such as Ruishton, Haydon, Henlade, Thornfalcon, West Hatch, Hatch Beauchamp, Ashill, Broadway and Horton Cross) and businesses including churches, indoor sports facilities, schools, care homes, doctor's surgeries and shops. Taunton Gateway Park and Ride is located within 500m of the M5 at Taunton. Twenty-three public rights of ways (PRoW) as well as other routes cross or meet the A358 and have been identified as potentially impacted by the proposed scheme. **The above says it all – rural environment etc.**

2.4.8 Between Capland and Kenny the proposed scheme would take an entirely offline route just to the north-east of the existing road. This would enable the existing road to be retained as a local route between Ashill and Hatch Beauchamp and provide access to existing properties along the route. **Where is mention of flyover at Hatch Beauchamp?**

2.4.11 At the eastern limits of the proposed scheme, the proposed dual carriageway would connect to the existing Southfields Roundabout. The roundabout would receive minor improvements to accommodate the scheme. **This is the problem and the dualling will only exacerbate the congestion already there due to A303 single lane access.**

Table 2.2 does not mention flyover/bridge at HB.

Table 2.3 states Griffin Lane will remain open – GL is a single track road and often impassable. It is a lane! The whole table just demonstrates how many roads will be closed or fundamentally altered all involving detours and increased journey times for local residents on a daily basis.

3.3.19 The Pink Modified option meets the scheme objectives, was more affordable and reduces the impact on the countryside. Scheme objectives are met as follows: · Capacity - The Pink Modified option will provide relief to the traffic congestion in Henlade. The average daily traffic would reduce from 33,500 vehicles to 4,000 vehicles in 2038. By reducing congestion and increasing capacity it will allow mile-a-minute travel as the norm along the new A358. **This speed is already achievable from Thornfalcon to Southfields. Again, all arguments centre on Henlade area.**

- Safety - The new A358 will see the existing road junctions and private accesses closed with new connections and junctions provided, making journeys safer by avoiding conflicting traffic-turning movements. The Scheme will also improve safety by encouraging road users to use the new A358, rather than seeking alternative local routes to avoid congestion into Taunton. **This will definitely not make journeys safer for local residents. They will be forced to use un road worthy lanes endangering themselves and other road users.**
- Local communities - The Pink Modified option will allow local traffic using the A378 to connect with the upgraded A358 at Junction C. This would improve local journeys into Taunton. The Pink Modified option will also cause less disruption to existing patterns of movement for local communities. The reduction in traffic congestion at Henlade will improve residents' quality of life. **This may improve Henlade residents' lives but that would be the only local community, all other parishes particularly those in Section 2 will experience poorer quality of life on a number of levels.**
- Connectivity - Connectivity to the south-west from the south-east and London will be improved, making Taunton and the south-west region more accessible. Daily travel for commuters and local traffic into Taunton will be safer and more reliable, by separating local movements from traffic passing through the area. **Again emphasis on Taunton and no regard for journeys to Ilminster/Yeovil. Londoners may travel through area twice a year yet residents will encounter daily unsafe and longer journeys and although staycations may be popular there is a finite amount of holiday accommodation so increase will not be exponential.**
- Resilience - The new road offers connection between the new A358, Nexus 25 and M5 junction 25. This will help reduce congestion between West Hatch and M5 junction 25. **Nexus 25 has yet to be developed and must be under review given Covid plus already excess office/development space at Blackbrook Park on the other side of the J25 roundabout.**
- Economic growth - The Pink Modified option provides direct access to Nexus 25, as well as connecting to the A378. This will help Taunton to become a more attractive place to work and do business and helps facilitate growth in Somerset and the south-west. **Nexus 25 has yet to be developed and must be under review given Covid plus already excess office/development space at Blackbrook Park on the other side of the J25 roundabout.**
- Environmental impact - The Pink Modified option avoids the Ancient Woodland at Huish Copse and at Stoke Wood and removes the need to impact the open space. **Open space around Hatch Beauchamp will be severely impacted with the construction of an 8m high flyover.**

4.1.8 A strong feedback theme from the initial 2017 consultation was a wish to see more options for connecting with the M5, for providing traffic relief for Henlade, and for connecting more directly with the future 'Nexus 25' development (a major new employment site planned in the southeast quadrant of the existing M5 junction 25). **Post Covid what is viability of Nexus 25 and no mention of any need past Mattocks Hill.**

Table 6.2 – no diffusion testing in HB vicinity

6.3.2 SWTC has declared two Air Quality Management Areas (AQMA) in the local authority which are shown in Figure 6.1. This comprises the East Reach AQMA and Henlade AQMA which were both declared in 2003 for exceedances of the annual mean NO₂ AQO. The East Reach AQMA is located approximately two kilometres west of the proposed scheme and the Henlade AQMA is located approximately 300m north of the proposed scheme. The A358 currently goes into the Henlade AQMA and the new alignment of the A358 for the proposed scheme will bypass the Henlade AQMA, which is expected to lead to improvements in air quality. **Yet again emphasis on Henlade. A major flyover is going to be constructed within 50m of residential properties in Hatch Beauchamp but it appears no consideration has been given to air quality at this site.**

6.4.1 The proposed construction works have the potential to impact upon sensitive receptors within 200m of construction activities as a result of construction related dust and emissions. According to the PCF Stage 2 Environmental Assessment Report (EAR), the construction phase is expected to last at least three years, *exceeding the two-year threshold defined in the DMRB LA 105 standards. It is common knowledge that such projects always exceed their target completion dates so why is this considered acceptable? The Transport Committee on March 17 2021 confirmed that 75% of infrastructure projects run over budget and time.*

6.4.11 The operational phase of the proposed scheme has *the potential to directly affect ambient concentrations of NO₂ (for human health receptors) and nitrogen deposition (for ecological receptors) as:* · The change in road alignment associated with the proposed scheme has the potential to introduce a new source of traffic pollution within 200m receptors, or partially / completely remove existing sources of traffic pollution from within 200m of receptors; and · The proposed scheme has the potential to affect traffic flows and speeds on the road network, *and so affect local air quality beyond the physical extent of the proposed scheme at human health and ecological receptors.*

Construction

6.5.1 The assessment of construction impacts would be restricted to within 200m of construction activities, as stated in DMRB LA 105. During construction, there is a potential for changes in air quality due to dust emissions from construction activity (e.g. earthworks, batching, soil storage etc.), emissions from site plant equipment, HGV movements and also from changes in traffic flows along the proposed scheme and wider road network with traffic management in place. *Those properties by the proposed flyover, within 50m of the construction, are liable to experience vibrations too with potential to damage the properties.*

6.5.6 On the basis that the proposed scheme would have a significant positive impact (due to relieving congestion and moving the road away from the Henlade AQMA) on local air quality concentrations, no specific mitigation or Air Quality Action Plans are expected to be required for the operation of the proposed scheme. *Focus on Henlade again.*

6.6.3 The proposed scheme has the potential to directly affect nitrogen deposition during the operational phase. Significant effects will be determined based on traffic impacts which are yet to be assessed. *When will these be assessed?*

6.7.3 A qualitative assessment of the impacts of nuisance dust arising during construction will be undertaken, using standards set out in section 2.56 of DMRB LA 105. Properties and ecological receptors within 200m of dust producing activities will be identified and appropriate mitigation recommended where required. *When would these take place? How long would it take to evaluate findings? And then how long would it take to implement mitigation?*

6.7.7 The proposed scheme is anticipated to improve air quality in the **Henlade** AQMA as the new alignment of the A358 for the proposed scheme will bypass the AQMA. *So only Henlade will benefit. Also under 6.7 it talks about air quality may be impacted but doesn't state when that assessment will be made and if its' after construction starts then that's too late.*

6.7.32 Traffic data will be provided for the air quality assessment by the Project transport team. *When?*

6.8.5 It will not be possible to determine the long-term impacts of the Covid-19 pandemic on traffic patterns and the consequential impact this may have on air quality in relation to the proposed scheme impacts on traffic emissions. **Why not?**

7.3.5 “Although all the listed buildings will be fully assessed...”. **Residents of the listed buildings have not yet been contacted about the assessment in this comment.**

7.3.9 **The list of prehistoric heritage assets is incomplete. For example, there is no mention of Somerset HER 43250: Prehistoric finds, High Bridge, Hatch Beauchamp which lies on the proposed route.**

7.3.12 **no mention of the Somerset HER 44497: Shrunken village of Capland, Hatch Beauchamp**

7.3.13 **no mention of in particular Somerset HER 38503: Medieval to post-medieval field boundaries, southwest of Perry’s Farm, Hatch Beauchamp, which lie in the vicinity of the proposed flyover.**

7.3.14 **no mention of impact on Somerset HER 14360: Bottle Bridge and Somerset HER 39241: Pot Bridge which both may be affected by increased traffic to proposed flyover caused by severance of other local access roads. No mention of in particular of Somerset HER 38599: Post-medieval field boundaries south of Hatch Green, Hatch Beauchamp and 38600: Extractive pit of post-medieval to 19th century date south of Hatch Green, Hatch Beauchamp which lie in the vicinity of the proposed flyover.**

7.3.15 **no mention of rivers such as Fivehead river which is close proximity to the proposed development.**

7.4.3 states “There would be no operational impacts on archaeological remains as any change to sub-surface features would have occurred during construction.” **This cannot be proven and paragraph 7.6.2 in the same report contradicts this statement.**

The second sentence states “However, there is the potential for noise, lighting and traffic movement to have adverse impacts on the nearby scheduled monument, listed buildings and registered park and garden located within the study area. These would be assessed as part of the EIA.” **Landowners have not yet been consulted about this assessment.**

7.5.2 **HBPC would like sight of the Environmental Management Plan (EMP) mentioned here.**

7.7.2 **we do not believe this should be out of scope as paragraph 7.6.2 states** “It is unlikely that any below ground archaeological deposits remaining after construction would be further affected by the operation of the proposed scheme options, although there is the potential for effects of compression and dewatering of soils, which will be considered in the EIA.”

7.8.1 **states effectively that a full assessment of heritage resources has NOT been undertaken, merely a primary visual assessment and desktop exercise, yet 7.6.1 states** “The scheme is likely to result in adverse effects on designated and nondesignated heritage resources during construction. The close proximity of a scheduled monument, registered park and garden and listed buildings to the scheme presents the potential for significant effects arising from changes to their settings.”

7.8.3 states “Non-intrusive or intrusive archaeological surveys have not yet been undertaken across the study area for the scheme; therefore, the archaeological potential cannot be considered to have been fully examined or determined as yet. Further examination will be carried out for the ES.” **We believe this assessment should be carried out before the EIA can be finalised and not at the ES stage as mentioned in 7.8.3 so that options for avoidance can be properly considered. Indeed, Paragraph**

5.126-127 of the NPSNN requires that, where the development is subject to EIA, the applicant should assess any likely significant heritage impacts. The applicant should describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the asset's importance. Where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, the applicant should include an appropriate desk-based assessment and, where necessary, a field evaluation.

We believe, given the assessment is that the impact is assessed as potentially significant in para 7.6.1, that a field evaluation would be appropriate, particularly as Paragraph 7.7.11 states that even moderate adverse effects on heritage assets can be considered to be material decision-making factors.

Under section 8 there is much discussion of light pollution and views from Blackdown Hills but no mention of 8m high flyover at HB and subsequent light pollution.

8.3.5 Staple Fitzpaine not Stable Fitzpaine

8.3.16 "Through a process of desk-top review, and discussions with Tree Officers at Somerset and West Taunton Council and South Somerset District Council, it has been confirmed that no Tree Preservation Orders are present within or adjacent to the scheme." We believe this statement to be incorrect. There is in fact a TPO (Taunton Deane Borough (Hatch Beauchamp No.1) TPO 1995) ref. PD22/548TD629 relating to 2 oaks at the junction of Bickenhall Lane and the A358. Although we haven't seen details of the exact alignment of the new road it's our opinion these trees are adjacent to the scheme and likely to be highly vulnerable indeed.

8.3.23 the table 8.1 regarding Hatch Beauchamp, Hatch Green and Battens Green does not make mention of the proposed flyover which would have significant visual impact.

9.4.10 The proposed scheme would also fragment habitats to the north of the existing A358 between Hatch Beauchamp and Ashill through loss of habitats associated with the widening of the online section. Given the predominantly arable landscape, the severance of existing wildlife corridors along the proposed scheme (such as watercourses, field margins, hedgerows and tree lines) *could have significant effects on species in the area as the new highway could* act as a barrier across the landscape.

12.2.5 The study area will also include vibration sensitive receptors in areas where there is a reasonable stakeholder expectation that a construction vibration assessment will be undertaken. *When will these assessments take place? There is real danger of significant vibration for householders in proximity to flyover construction with the possibility of damage to properties. During or after the event is too late.*

12.3.7 Several of the NIAs along the A358 include individual or small groups of isolated dwellings. NIA 3497 includes a larger number of dwellings and is located in Henlade. *Again Henlade centric emphasis. Which NIA corresponds to Hatch Beauchamp in particular those households by the proposed flyover?*

12.4.9 DMRB LA 111 states that operational vibration should be scoped out of the assessment methodology as a maintained road surface will be free of irregularities so operational vibration will not have the potential to lead to significant adverse effects. It is considered that there is nothing within the initial design of the scheme that would change this assumption. Therefore, operational

vibration is scoped-out of the assessment. **How does this relate to the proposed flyover which will be in close proximity to residential properties?**

12.5.1 Mitigation measures for noise and vibration include measures embedded into a project design to reduce the overall environmental impact (e.g. new road alignment) and measures used solely to mitigate noise (e.g. noise barriers, restrictions on plant or activities during the construction phase, quieter road surfaces). **Why 'solely to mitigate noise' – surely vibration needs to be included?**

Table 12-3 – **this shows night and weekend working, residents by proposed flyover were given assurances that there would be no out of hours work.**

The noise levels have already significantly increased by the A358. So it is imperative to look at adequate measures of noise prevention to help prevent further "deforestation ".

13.1.2 Key policies from the NPSNN relevant to this discipline includes: · Paragraph 3.22 states that severance can be a problem in some locations. Where appropriate applicants should seek to deliver improvements that reduce community severance and improve accessibility. **Communities will experience severe severance and reduced accessibility.**

· Paragraph 5.205 states that applicants should consider reasonable opportunities to support other transport modes in developing infrastructure, and that the applicant should provide evidence that they have used reasonable endeavours to address any existing severance issues that act as a barrier to non-motorised users. **There is no public transport that serves Hatch Beauchamp and leaving the village with just single track lanes will make any introduction impossible.**

· Paragraph 4.82 of the NPSNN states that the applicant should identify measures to avoid, reduce or compensate for adverse health impacts as appropriate. These impacts may affect people simultaneously, so the applicant, and the SoS (in determining an application for development consent) should consider the cumulative impact on health. **Essential particularly as the village has an elderly demographic.**

· Paragraph 5.184 states that public rights of way, National Trails and other rights of access to land (e.g. open access land) are important recreational facilities for walkers, cyclists and equestrians. Applicants are expected to take appropriate mitigation measures to address adverse effects on coastal access, National Trails, other public rights of way and open access land and, where appropriate, to consider what opportunities there may be to improve access. In considering revisions to an existing right of way consideration needs to be given to the use, character, attractiveness and convenience of the right of way. **HB has a large cycling and equestrian community.**

· Paragraph 5.206 states that for road and rail developments, if a development is subject to EIA and is likely to have significant environmental impacts arising from impacts on transport networks, the applicant's environmental statement should describe those impacts and mitigating commitments. **Essential**

13.2.3 A wider context will also be considered to understand the sensitivity of routes within the study area used by walkers, cyclists and horse-riders (WCH) that could potentially be affected by the proposed scheme. For cyclists, recreational walkers and horse riders, consideration will be given to possible origins and destinations of up to 10km from the construction footprint of the proposed scheme, while a distance of up to 2km will be considered for regular walking journeys. The consideration of this wider context is deemed sufficient to provide insight into the likely purpose of journeys that cross the footprint of the proposed scheme since typical regular walking distances are up to 2km, while cycle commutes are typically up to 10km. *It is also considered sufficient to capture the context for horse riders and long-distance walkers who would typically travel more than 2km as part of a recreational journey.*

The bridlepath from Hatch Green Lane to Bickenhall Lane providing WCH access to cross A358 not considered, similarly the link to the Herepath using the underpass under A358 at Hatch Green. Two footpaths (T2/4 and T2/5) leaving the south end of Bickenhall Lane (one at the end of Bickenhall Lane and one 250m towards Taunton) and crossing the A358 towards Bickenhall, third leaves Village Road 50m past Hatch Green Coaches across the field parallel with the river and crosses the A358 across the field to Battens Green Farm (T14/5). The footpaths and the A358 crossings should be kept accessible.

13.3.10 There are a number of churches within the study area including The Church of Jesus in Taunton, St Mary's Church in Ashill and St Aldhelm and St Eadburgha's Church in Broadway. There is a Grade I listed church in Hatch Beauchamp. Seven Sowers Benefices of seven churches covers both sides of the A358.

13.3.11 Schools within the study area include Kiddi Caru Day Nursey in Taunton, Somerset Progressive School in West Hatch and Ashill Primary School. HB has a primary school.

13.3.12 Horton Cross Nursing Home is within the study area which provides care for the elderly. HB has a care home. The above omissions are staggering and begs the question what exactly is HE's knowledge of HB? This is crucial information for accessibility issues. Are we to assume that HE have based all their arguments on the dualling without factoring in these HB businesses/institutions? Any simple desktop research would have provided the information and these omissions would seem negligent.

13.3.15 There are over five hotels or B&Bs within the study area at Ruisthon, Henlade, Thornfalcon and Ilminster, and campsites at Ruishton and Thornfalcon. HB has a pub with B&B and also a restaurant with accommodation. HB also has a business park, Sterling Services as well as a timber business. Unicorn Arena is also due to open this year in Hatch Green with an increase of 8-12 horse boxes per day travelling to the site expected by the business owner.

13.3.22 There are limited safe crossing points for walkers, cyclists and horse-riders across the A358. There is an underpass at Griffin Lane which connects West Hatch and Hatch Beauchamp. This underpass is part of the East Deane Way long distance walk, around Taunton on to Sedgemoor. National Cycle Network Route 33 starts in Bristol, crosses Somerset at Taunton and ends at Seaton. A short stretch of the cycle route is through Hatch Beauchamp within the study area, but not along the A358. Griffin Lane is a lane with no passing places. By pushing traffic onto a single track road the safety of all users will be severely compromised. The bridlepath from Hatch Green Lane to Bickenhall Lane providing WCH access to cross A358 not considered, similarly the link to the Herepath using the underpass under A358 at Hatch Green.

Two footpaths (T2/4 and T2/5) leaving the south end of Bickenhall Lane (one at the end of Bickenhall Lane and one 250m towards Taunton) and crossing the A358 towards Bickenhall, third leaves Village Road 50m past Hatch Green Coaches across the field parallel with the river and crosses the A358 across the field to Battens Green Farm (T14/5). The footpaths and the A358 crossings should be kept accessible.

13.3.28 There is no public transport for HB.

13.3.29 The World Health Organization (WHO)109 constitution defines health as "a state of complete physical, mental and social well-being and not merely the absence of disease or infirmity". This scope of assessment therefore includes consideration of potential impacts of the proposed scheme on physical, mental and social health.

13.3.39-42 Census data from 2011 is being used, in light of Covid this needs to be reviewed and revised. The Transport Committee of 17 March 2021 stated:

Lord Hammond: In the short term, you have to expect that any major ongoing review that started before the Covid crisis will now need additional time to review its findings, and indeed its evidence, in the light of Covid. We do not yet know the new facts against which those decisions have to be retested. They will only emerge as the country comes out of lockdown and we see to what extent previous patterns of work-life behaviour re-emerge, or whether in fact those patterns have changed for good. What happens is that projects get announced, often with over-ambitious delivery dates and unrealistic budgets.

13.3.49 No air quality data for HB.

13.3.55 The A358-accident rate per billion vehicle – kilometres travelled for this period was 110 which compares to a national accident rate of 171, suggesting that the frequency of accidents is lower within this area. **This is a considerable difference between figures and must negate the argument that dualling will make the road safer. In fact, if dualling on section 2 goes ahead we can foresee an increase in accidents not just vehicular due to pushing more traffic onto small local roads by reducing community access points to the A358.**

13.3.58 The COVID-19 pandemic that has affected the UK in 2020 may influence future trends. For example, there may be an increase in people working from home even following the end of the pandemic. Some people may switch from the use of public transport to walking, cycling or using their own cars due to concern about communicable diseases. In addition, people may have an increased preference for outdoor recreation where social distancing is easier than in indoor leisure and recreation venues. The level to which these types of behaviour change may occur will depend on the trajectory of the pandemic and individual responses to their experience of 2020/21 (e.g. heightened anxiety or concern) which is, at this time, uncertain. These changes in behaviour will be picked up during survey work carried out for the EIA, e.g. PRoW user surveys). **People are already working from home contractually so there is already a permanent shift away from the daily commute. Please see comment above from Transport Committee.**

Table 13-10 Hatch Beauchamp primary school has been omitted as well as the business park, Unicorn Saddlery, Sterling Services and Weavo Timber.

Table 13-11 **It is stated that Landscape Amenity is LOW for Neroche – we dispute that statement in light of a proposed flyover being built directly in front of residential properties in Hatch Beauchamp.**

13.4.2 Construction of the proposed scheme may cause temporary and permanent changes to access for residential dwellings from sections of the existing A358, particularly where the offline bypass is proposed and where new junctions are proposed. Where existing local access onto the A358 is stopped up this could result in severance, and residents may face potential changes to journey times. **This is a definite outcome – there will be permanent severance and increased journey times.**

13.4.3 There may also be a temporary loss of amenity at homes close to areas of construction from factors such as dust, noise and visual intrusion. **There will be a definite PERMANENT loss of amenity, in particular noise and visual intrusion, for those households by the flyover in HB.**

13.4.7 Construction of the proposed scheme may cause temporary access issues to businesses from sections of the A358 undergoing online widening or where the construction of new junctions is proposed. **These will be PERMANENT access issues.**

13.4.15 Construction may result in delays to public and private transport journey times which can lead to impacts on mental health from actual or perceived social isolation. Longer journeys can exacerbate this with people potentially avoiding making journeys to avoid the construction disturbance (depending on the severity). Connectivity to Public Rights of Way along the proposed scheme and the existing A358 may also become restricted, limiting opportunities for active travel and recreation. **There is no 'MAY' about it – travel will be delayed and longer journeys will be fact.**

13.4.19 Research into the effects of the visual and aesthetic environment on well-being is mainly focused on the psychological effects of 'natural' versus 'man-made' or urban views. During construction it is unlikely that there would be any resulting health effects, primarily due to the temporary nature of construction. However, it could be argued that knowledge of the resulting long-term changes to the visual and landscape context as a result of the proposed scheme could override this assumption. **The flyover at HB will be a permanent construction and will create an urban view whereas the view is currently agriculturally land.**

13.4.23 The use of the new road could have an impact on access to homes and residential areas during operation. Impacts on access could occur from changes in traffic flows in the wider network (for example if higher flows are induced along particular residential streets), or through improvements to access from the proposed scheme, where a settlement is bypassed. These changes in traffic could also lead to changes in amenity at homes from factors such as dust, noise and visual intrusion. **The new road will definitely impact on access to homes and businesses etc and will lead to loss of amenity.**

13.4.28 That said, there would be potential beneficial impacts on access for WCH where the proposed scheme could address issues of past severance, poor accessibility and inadequate footway, cycleway and bridleway provision. Improvements in access may help more people access public transport hubs and bus stops. Improvements to provision could improve amenity for active travellers, for example through increasing segregation from fast traffic and HGVs. **This assumption is ridiculous – for HB severance will only increase, accessibility will become worse for all WCH. Again there is no public transport in HB. The bridleway network would be negatively impacted by the loss of the bridlepath from Hatch Green to Bickenhall Lane which provides a crossing point for the A358.**

13.4.31 There are a number of potential pathways between operational traffic flows and health outcomes with a number of interactions between several of them. The proposed scheme has the potential to reduce the exposure of the local communities to some of the negative pathways, for example through reducing traffic volumes that pass through some communities, therefore reducing exposure to vehicle emissions. Each of the relevant health determinants is listed below along with a description of how operation of the proposed scheme may affect them. **The proposed scheme will only increase traffic volumes in HB village as well as vehicle emissions.**

13.4.32 The proposed scheme is likely to improve access to health, community, recreational and educational facilities through improved journey times, improved connectivity and the removal of heavy traffic through settlements such that local amenity is improved (i.e. making facilities more pleasant and desirable to visit). **These outcomes are the polar opposite of what will happen in HB.**

13.4.34 An objective of the proposed scheme is to improve connectivity and journey reliability (durations) therefore connectivity to improving some of the social determinants of health such as access to employment, services and social networks would improve with subsequent benefits to health. Connectivity to and creation of improved PRow may also be improved, therefore benefiting opportunities for active travel and recreation which are known to improve health and well-being.

Again none of these objectives will be achieved for the local residents. Daily journeys will only increase and journey time will be totally unreliable if everyone is forced to use lanes.

13.4.35 Severance as a result of the proposed scheme passing through areas that were previously connected may also impact on the social networks and support systems previously existing, impacting on health. This is guaranteed to happen. Villagers are extremely concerned about the increased severance.

13.4.36 Alignment avoids all but a few settlements, especially along the western end, therefore the proposed scheme has the potential to decrease the size of the population exposed to air pollution; therefore decreasing the risk of the associated health conditions. We dispute this assumption.

13.4.37 The majority of changes would bring reductions in noise to the local communities. This would not be the case for HB where the road would be brought closer to the village plus the addition of a flyover directly in front of homes.

13.4.40 The proposed scheme aims to improve road safety; the introduction of pedestrian bridges or underpasses has the potential to improve pedestrian safety. In addition, the improved opportunities for active travel would result in the proposed scheme improving population health through increased opportunities for regular physical activity. The scheme would not improve road safety within the village or surrounding roads. The increase in traffic would deter WCH and decreases safety for these user groups.

13.4.41 Employment and a strong economy is related to social and psychological wellbeing. The proposed scheme would not directly provide employment opportunities, however, indirectly it provides improved transport networks which people use to connect with employment opportunities, and which can serve as economic catalysts for an area. Health benefits would be most likely to be experienced by those who previously found accessing employment difficult. The road would only make it more difficult and time consuming for local residents to travel to Taunton/Exeter and Ilminster/Yeovil.

13.5.3 Clear, regular and sensitive communication between the developer's land agents and affected parties would be maintained to reduce uncertainty and anxiety among the residential, business and agricultural communities. It is clear from this document alone that HE does not understand the local area, nor does it understand the local concerns. We, the residents, are the experts in relation to the consequences of this proposed scheme. The newly instigated Forums via Zoom for parish councils are extremely limited in nature and restrictive in attendees allowed. This does not give any reassurance and in fact seems to be an attempt to reduce our input.

13.6.3 The inclusion of the proposed bypass may mean that the settlement of Henlade, along the existing A358, would be subject to improved air quality. That said, the beneficial effect in Henlade may be partially offset by a worsening effect in Lower Henlade due to the new road. Again focus on Henlade. The air quality in HB may well worsen as a result of the scheme.

13.8.1 This scoping assessment has been undertaken based on a preliminary understanding of the baseline. Further potential receptors will be identified as part of the ongoing EIA process to close existing data gaps. If 2021 census data or more up to date mid-year estimates are available at the time of undertaking the final EIA these will be used where appropriate. Surely more up to date data than a census from 10 years ago must be a given?

Para 15.1.2 says “applicants should provide both evidence of the carbon impacts of a scheme and an assessment of these impacts against the Government’s carbon budgets.”

As part of the assessment process, we are told, the baseline position for the proposed scheme will be calculated for GHG sources identified in Table 15-1.

It is clear from the surrounding paragraphs that there is, as yet, neither a clear baseline on targets from Government nor, more importantly, any real work on the impact of the proposed scheme on local carbon emissions.

Two important knowledge gaps.

If someone wishes to explore the issue of local impact, they will have to rely on Table 15–1 as a starting point.

The Table tells us that the majority of transport-related GHG emissions in Somerset (County Total) in 2018 came from Industry and Commercial vehicles – 962 ktCO₂ over Domestic at 785 ktCO₂. As for total end use, almost all emissions come from road transport. Emissions from A-roads represent the largest proportion with Minor Roads coming just behind – 592 kyCO₂ and 466 kyCO₂ respectively.

When these different modes of transport are taken into account, we find that the total for A roads and Minor roads together, at 1058 kyCO₂, far exceeds Motorways. In other words, the potential impact from changes in the pattern of travel on A roads and Minor roads is much greater than the potential impact of conversion of A358 to an Expressway. Any improvement there would be small, much less relevant to total emissions than A roads and Minor roads.

The A358 scheme proposes what is almost a sealed corridor through large parts of the section from Thornfalcon to Southfields. It is obvious that transport through A roads and Minor roads will increase as a result.

In section 15.4, just after Table 15-8, on Page 231, comes the statement: “The vulnerability of the proposed scheme to climate change during its operation should be scoped in for further assessment.”

Is this a recognition that traffic impact on A and Minor roads has not yet been researched? Is it an oblique implication that they should be? I hope so. 15.6.3 on Page 263 offers little clarity, saying only that “the change in emissions due to the proposed scheme will be included in further study and presented against the relevant carbon budgets.”

It is obvious that a largely sealed corridor will drive traffic onto A roads and Minor roads. Therefore a study of the impact of reduced crossings is essential to an informed judgment on GHG. It is especially urgent because Highways England has proposed very few remaining crossings along the corridor. Some, like Griffin Lane, are totally unsuitable for any additional private transport and impassible for agricultural use. Many farm properties span the A358 and crossings by loaded tractors are frequent. The extra length and duration of their journeys must add to their carbon contribution substantially, as would, of course, the increased mileage of private vehicles.

If government is serious about GHG contribution, further directed research is absolutely essential. If the A358 goes ahead without it, the scheme will be “flying blind” and damage will have been done without due care, no way to meet the challenge of climate change.

In summary:

- (1) there is as yet no baseline from government on GHG emissions
- (2) no properly defined study of the impact on local traffic has been proposed
- (3) the limitations and poor selection of crossings will have an adverse impact and must be reconsidered
- (1) if climate change is a serious concern, and it should be, this scheme should not go forward without addressing these defects.

1. General Observations

The HM Government's Road Investment Strategy (RIS1 and RIS2) and the National Policy Statement for National Networks (NPSNN) both document the need for a strong Business Case. For example, NPSNN 4.5 states 'The economic case prepared for a transport business case will assess the economic, environmental and social impacts of a development.' and RIS2 pg 91 states 'We are committing funding to deliver the schemes named in RIS2 on the assumption that they continue to demonstrate a strong business case and ... and offer sufficient value for money to justify public investment'. It appears to HBPC that this Business Case was last assessed in detail before RIS1, i.e. before 2012 and which included data from 2009 as well as using some questionable methodology (ie the company conducting the company surveyed its own staff), it had a response rate of under 3% and not presented in detail for the present EIA. It should be re-examined in the context of the late 2020s and should include impact on local businesses and traffic.

Similarly, although Option routes for the dualling are discussed in the A358 EIA, more fundamental 'Alternatives', as demanded in NPSNN 4.26/27, and as presented on numerous occasions at prior consultation meetings and by correspondence with HE, do not appear in HE's draft EIA. Such alternatives will be discussed later under Heading 3. Suggested Mitigations.

The EIA does not reference two NPSNN road safety policies nor fulfils the requirements of these policies. The applicable NPSNN policies are:

4.64

The applicant should be able to demonstrate that their scheme is consistent with the Highways Agency's Safety Framework for the Strategic Road Network and with the national Strategic Framework for Road Safety. Applicants will wish to show that they have taken all steps that are reasonably required to:

- . minimise the risk of death and injury arising from their development;*
- . contribute to an overall reduction in road casualties;*
- . contribute to an overall reduction in the number of unplanned incidents; and*
- . contribute to improvements in road safety for walkers and cyclists.*

5.202

Development of national networks can have a variety of impacts on the surrounding transport infrastructure including connecting transport networks. Impacts may include economic, social and environmental effects. The consideration and mitigation of transport impacts is an essential part of Government's wider policy objectives for sustainable development.

As part of the local community we are extremely concerned by the scheme's proposal to close all direct access to the dualled A358 for the 5 mile section between the Ashill and Mattock's Tree Green junctions. The EIA records at paragraph 3.2.6 that HE took the decision to close all 11 local road links primarily as a cost cutting measure, without complete analysis of the suitability of the local network to handle the volume and types of traffic and the impact this traffic would have on the road safety of walkers, cyclists and horse riders (WCH). This extreme decision will have a serious negative impact on road safety, general well being and health of the local area and discourage the activities of walkers, cyclists and horse riders. The Applicant has not fulfilled the NPSNN 5.206 requirement to include within the EIA a full description of the impact of their decisions with mitigating commitments.

3. The scheme proposes local traffic divert through rural roads to access the A358 at either the Ashill or Mattock's Tree Green junctions necessitating long journeys through narrow and often windy country lanes. Moreover, to reach either of these access points most local traffic will be funnelled through the villages of Hatch Beauchamp and Ashill and each will experience a large increase in traffic, which will inevitably have a negative impact on road safety within the villages. Both villages had bypasses built in the 1980s and 90s, which the scheme incorporates into the dualled A358, yet the implication of closing all local links will be to return the villages to traffic volumes that precipitated the need for a bypass and negatively impact local businesses and residents.

4. The EIA notes at paragraph 13.3.20 that although walkers, cyclists and horse riders are not prohibited from using the A358, the current road is not suitable for this type of use due to traffic volumes and speed. Fortunately, the local rural roads are ideal for WCH users, which have increased following COVID restrictions. Local traffic currently joins the A358 at the numerous connections and consequently motorised traffic on the rural network is minimised. Forcing local traffic to remain within the local network for long distances will undoubtedly cause conflict with WCH users. Traffic volume and incompatibility would lead to a rise in accidents and incidents within the local rural road network and discourage WCH from using a valuable local resource. This outcome directly opposes the Government's wider policy objectives for sustainable development.

5. HE's analysis of the current deficiencies of the A358 at paragraph 2.1.1 avoids the primary reason for delays, which are the inadequacies of the roundabouts at the west and east ends of the A358. Junction 25 to the M5 and the approach through Henlade is the primary cause for delays heading west, as is Southfields roundabout and Ilminster bypass for easterly traffic. These two bottlenecks are the cause of traffic congestion along the A358. East of Thornfalcon traffic flow is never compromised by local traffic joining and HE's own data recorded at paragraph 13.3.55 proves that the current A358 with all the current links has a considerably lower accident rate than the national average (110 versus 171 accidents per billion vehicle kilometres).

6. As the scheme has insufficient funding for incorporating free flowing junctions at both ends of the A358, HE's analysis concentrates on the second order deficiencies along the A358. The scheme's proposals for improvement appear to follow motorway design specifications for maximum speed of through traffic from one roundabout to the other, with a consequential disproportionate negative impact to the local rural communities. The loss of historic accessibility to the A358 necessitating long diversion through windy and narrow lanes, incompatibility of traffic types (cars,

vans, lorries and agricultural vehicles) with each other and WCH uses will increase mental and physical stress on local communities. School runs will become more stressful. Businesses will be handicapped. Community severance will increase. The scheme does not consider in any depth these effects nor offers any mitigation of substance.

7. With government approval of the Sparkford to Ilchester dualling scheme local communities now have a template to compare to the proposal for the A358. Both schemes originated from the government's Road Investment Strategy 2015-2020 published in 2014 and both are part of the long-term commitment to creating a new Expressway to the Southwest. However, the designs of the two schemes are different in several ways. Whereas the Sparkford to Ilchester scheme has free-flowing connections to the existing A303, the A358 scheme terminates at existing roundabouts that will undergo only marginal improvements. The Sparkford to Ilchester scheme has also maintained connectivity for local traffic by including standard trunk road at-grade junctions at Downhead and Camel Cross approximately halfway along the 3-mile long scheme. The EIA states at paragraph 2.4.2 that the A358 scheme is to be built to the same trunk road standards. However, the overwhelming priority given to through traffic and seasonal holiday traffic has produced decisions on local access to follow motorway specifications, with the consequential easy dismissal of the need for local connectivity between the Ashill and Mattock's Tree Green junctions.

8. We absolutely disagree with the assertion in paragraph 3.3.19 that the scheme will cause less disruption to existing patterns of movement for local communities. Local concerns regarding the loss of existing links to the A358 have been expressed at all opportunities including the Highways England sponsored Community Liaison Forums. We have proposed solutions to resolve these concerns but to date these concerns and our proposals have been ignored. The scheme development is now at Stage 3 – the last stage - when the Preferred Route is developed to the Preliminary Design level to allow planning consent applications to be made. We are deeply concerned that reversing, or even amending, decisions made in Stage 2 that led to the Preferred Route Announcement will not be achieved through local appeals and we look to the Inspectorate to convey these concerns to Government and to Highways England.

The Planning Inspectorate should be made aware of these deficiencies.

2. Major Local Considerations

HE's A358 Section 2 dualling scheme proposes to close all direct crossings from Thornfalcon/Mattocks Green to Ashill, a distance of some 5 miles. The major concern of HBPC is that the Scope of the EIA does not sufficiently consider the impacts of this proposal on local residents, local businesses, local traffic flow, local social interactions, etc. These impacts will be discussed here under the broad heading of Population and Health. The sections 13.4.31-41 of HE's EIA give a completely misleading impression of the likely impact on the local populace.

Impacts on local Population and Health are an important consideration of government as expressed in the EU Directive, RIS, NPSNN and EIA documents. Thus, in NPSNN 4.15, it states that the Directive specifically requires an EIA to identify, describe and assess effects on human beings includes effects on health. HBPC believes that HE's Scoping Report does not achieve this. There is no detailed analysis on the potential disturbance to the local people which would impact on the health and well-being of communities either side of a dualled A358. Direct and indirect impacts of severance need to be considered.

Direct impacts include:-

- i. The severance impacts on families and friends split by the new proposal with its paucity of viable connections across the dualled highway. Following the pandemic, the ongoing reinstatement of these social links is having positive effects on the people's wellbeing. Further isolation would have a big impact.
- ii. Strongly related to well-being and mental health is the social contact provided by churches and social groups. Severance, in for example West Hatch, will impact journeys across A358 to the parish church of St. Andrews and the WH Village Hall and hence on community ties. Seven Sowers benefice covers both sides on the A358.
- iii. The economic viability of agricultural and other businesses could be detrimentally impacted by severance leading to mental stress of the owners and workers. A prime example is the four businesses at Nightingale Farm; the new route is a 4-5 km detour through narrow, twisty lanes and the hamlet of Lower West Hatch – impossible for the large articulated vehicles servicing these premises. The owners and workers at these businesses are already stressed by worries about their future.
- iv. Similarly affected by this 4-5 km detour is access to the Huish Woods Scout Camp, which receives trivial, almost insulting, mention in HE's EIA (Table 13-10). This nationally and internationally renowned facility contributes to the well-being and social development of young people and is in full-time use throughout the summer.
- v. Also impacted by this detour is Somerset Progressive School, an amenity helping with the development of disadvantaged children. Its viability is questionable if severed as will occur with A358 dualling.
- vi. Closure of Bickenhall Lane will directly impact access from the north, south and east via the A358 to the nationally important RSPCA Centre for Wildlife and to a less extent the Farmers Arms (neither considered in HE's EIA).

The major indirect effect of severance is the impact of consequential changes in traffic flow. Although these are difficult to predict, HE have not provided significant analyses of these changes, nor are such analyses proposed in detail in the EIA Scoping Report. However, severance, especially closure of the much-used Bickenhall Lane, inevitably will result in an increase in traffic along local lanes trying to find places to cross or join the A358. This will be clearly be the case for traffic, emanating from and to inter alia the Bickenhall, Curland, Staple Fitzpaine areas, trying to access or cross the A358 to head for Ilminster and the A303 or for Taunton and the M5 or for North Curry, Langport, etc. This increase in vehicular traffic will include domestic cars, service and delivery vans, bigger lorries, large agricultural and contractor vehicles, etc, etc. Roads in and around West Hatch and Slough Green are much used by horses and bicycles, and within 200m of Thurlbear SSSI. There are disasters waiting to happen.

The NSPNN requires that the EIA seriously considers, analyses and reduces the risk of accidents. Thus, NPSNN 4.54 asks that applicants demonstrate their proposed scheme is consistent with the National Strategic Framework for Road Safety, i.e. show *that they have taken all steps that are reasonably required to:*

- . *minimise the risk of death and injury arising from their development;*
- . *contribute to an overall reduction in road casualties;*
- . *contribute to an overall reduction in the number of unplanned incidents; and*

. contribute to improvements in road safety for walkers and cyclists. It is unclear to HBPC that HE have done or plan to do this in the HE's Scoping Report for the A358 EIA. They have not taken into account such considerations on local routes.

This, together with indirect impacts on human health and welfare need to be assessed in the EIA, including:-

- i. Mental stress of local inhabitants, particularly older residents, caused by driving with the increased traffic and consequent increased risk of accidents.
- ii. Mental and physical stress caused to walkers, cyclists and horse riders (WCH) using the local roads for pleasure, social activities or business.
- iii. Mental stress caused by noise, vibrations, diesel fumes and damage from large vehicles close to houses and gardens. Many local lanes pass very close to houses.

Other weaknesses in HE's Scoping Report for the A358 EIA include:-

Emission calculations should be updated, considering impact of government's new policies and requiring recalculation of carbon and nitrogen oxides emission savings for the years 2024-6 when i) electric cars will already be reducing traffic emissions and ii) slow and heavy local traffic will have increased.

Need for an assessment of Impact on flora, fauna etc of increased local traffic through areas close to SSSIs and LNRs, hedges and verges, etc.

Need for balancing alleged decrease risk of accidents on the Southfields to Mattocks Green section of the dualled A358 with the increased risk of accidents on local roads, particularly the higher risk of accident to vulnerable WCH, as a result of severance of local access to A358 causing increased local traffic. The accident rate on the present A358 is already significantly less than the national average (HE EIA 13.3.55).

3. Suggested Mitigations

HBPC and other parish councils along Section 2 of the A358 are concerned and convinced that HE's proposal for dualling will not have the desired effect of reducing congestion and speeding traffic flow but will have the undesired effect of separating communities and increasing local traffic problems.

In consultation with other local councils along Section 2 of the HE proposed scheme, HBPC has made suggestions for mitigating these issues.

3.1 Mitigation to ease Congestion at Southfields.

As local residents and frequent users of the A358, we are aware of the major issues affecting traffic flow. Congestion is an issue at both the Southfields and M5 junctions, with occasional minor collisions. Flow along the Section 2 of the A358 generally, however, progresses smoothly and safely with speeds between 50 and 60 mph from Southfields to the traffic

lights at Thornfalcon. The HE proposed dualling of the A358 will not reduce this congestion and only have a minor effect (>3 min) on journey time.

Congestion at Southfields will only be reduced by increasing capacity of the roundabout itself and providing extra designated lanes, e.g. from 200m on the eastbound A358 before, round and on the A303 after the roundabout. West bound congestion from the A303 to the A358 will also require a designated lane or two separate from the roundabout itself.

This suggestion then makes redundant any need for dualling the A358 Section 2 to Thornfalcon. Some minor works, e.g. slip roads, at local junctions would be helpful but not essential. Even if dualling goes ahead, this suggested work should be done first.

3.2 Mitigation for severance of local access and local traffic increases.

In respect of severance, NSPNN3.22 states '.... applicants should seek to deliver improvements that reduce community severance and improve accessibility.'

If suggestion 3.1 above is not adopted, HBPC and other local councils have developed schemes which would allay or ameliorate some of the concerns expressed above under Major Local Considerations.

Improvements can be made that would mitigate many of our concerns. We also believe savings can be made in the current proposal to pay for changes we want.

- a. The new connection at Mattock's Tree Green Junction to the existing A358 and Henlade is not warranted. The current traffic light controlled junction at Thornfalcon would suffice with the additional link to roundabout north. The link from Hatch Beauchamp Village road should go to the Thornfalcon junction as EIA Figure 2.1 indicates. Maintaining this junction as existing would save money and improve movement of local traffic and avoid severance.
- b. There is an agreed local need for access on and off the A358 between Ashill and Mattocks Green. We propose that there are slip roads on to the west bound carriageway and off the eastbound carriageway of the dualled A358 near Bickenhall Lane and Hatch Beauchamp Village Road, using an extended service road from Ashill and the HB overbridge to connect these slip roads. These 2 slip roads together with the extended service road will allow access on and off the A358 in both directions for traffic from Hatch Beauchamp, Hatch Green, Bickenhall, Curland, Staple Fitzpaine, Slough Green, West Hatch, Curry Mallet, Beercrocombe and, with a short extension, from Capland and Stewley. Bickenhall Lane is chosen because it is presently a preferred local route (HE's traffic analysis) and provides convenient access to the RSPCA premises. Interestingly slip roads appear to take priority over dualling in NSPNN 2.23.
- c. The West Hatch Lane link to Somerset Progressive School and adjacent business park is impractical as the diversionary route proposed is some 3 miles distance along very narrow windy lanes. The link should be from the school/business park direct to Mattock's Tree Green roundabout south. Rerouting this link should incur no major costs.

- d. Griffin Lane is too narrow, windy and hilly to be used as a major local road. WCH use this lane extensively so the scheme's proposal for greater use of this lane by local motorised traffic is frankly dangerous.
- e. Bickenhall Lane is a busy local route (over 500 AADT) favoured by farm traffic and lorries. We propose this lane is kept open by extending the planned service road from Ashill to Hatch Beauchamp overbridge to Bickenhall Lane. We also propose that a slip road access be provided onto the southern carriageway at the western end of this extended service road. Offset savings will be made by not requiring suitability assessments of the diversionary routes proposed and the remediation that would be required on these routes to make them acceptable. This would enable the retention of the current bridlepath connectivity between Bickenhall Lane and Hatch Green Lane which is extensively used by WCH, and the underpass path connection to the Herepath through the underpass under the A358 at Hatch Green to Battens Green, which are not considered in the EIA.
- f. The Hatch Beauchamp overbridge is considered to be unnecessarily complicated and sited at the most difficult and environmentally intrusive position. We believe the overbridge should be sited about 200 metres west, where the adjacent ground is higher, dryer and more stable, and aligned with and connected to Staple Fitzpaine Road (locally called Batten's Green Road). The overbridge should span the dual carriageway and the extended service road. The existing Batten's Green Road junction with the A358, which has been perfectly acceptable to date, should remain connected to the service road, dispensing with the scheme's expensive link Hatch Beauchamp Road East. Slip roads on the Hatch Beauchamp side should be provided to access the A358.
- g. HE traffic data for Village Road exceeds the criteria documented at Table 5.18a of CD123 Revision 2 for provision of slip road access. We therefore propose that the current Village Road from Hatch Beauchamp be modified to connect it to the northern carriageway via converging and diverging slip roads.
- h. Although EIA Figure 2.1 shows Capland Lane connected to Village Road by a link, other briefs have not shown this connection. The link is necessary, as Capland Lane west is the only flood free access to properties along Capland Lane and the northern part of Stewley Lane.
- i. The Kenny overbridge is too complicated and therefore expensive for the requirement. A simple straight connection from Stewley Lane to Wood Road should be possible in spite of recent development at Stewley Cross. The existing roads at Stewley Cross should remain, as again they are perfectly satisfactory. We propose that the junction with the existing A358 remains and becomes the eastern extent of the service road. We also propose a slip road access from the southern carriageway onto the service road at this point.
- j. For clarity and emphasis, we propose slip roads off and on the southern dual carriageway at the eastern and western ends of the service road. We also propose slip road access off and on the northern carriageway at Village Road, Hatch Beauchamp. These additional access points are low cost solutions to provide satisfactory connectivity to the dual carriageway by the local network. If provided,

traffic through Ashill and Hatch Beauchamp would be greatly reduced as would the distances driven by users of the local rural network. Confliction with WCH users would be reduced, damage to the environment would be reduced as would the mental and physical stress felt by local communities.

k. The link to Ashill sewage works should be replaced by a simple works entrance off and on the northern carriageway, as is done in many locations on the national trunk network.

l. The EIA gives little information about the upgrade to Copse Lane and we question whether the depicted route will be able to cope with the level of traffic heading to Ilton.

4. Summary

To respond to this EIA local parishes have combined knowledge in order to provide a useful critique to the current scheme proposal together with proposals for mitigation. We realise that we do not hold all the necessary technical information, but our opinions are based on local knowledge, local concerns, local practices and likely behavioural responses. In these areas our knowledge exceeds that of HE.

HBPC along with other local parish councils believe that HE has not made a satisfactory case for dualling the full length of the A358. The proposed dualling will not ease the major problems to traffic flow which are at both ends of the A358, particularly at Southfields.

HE has not investigated the direct and indirect effects of increased local traffic resulting from severance of local connections.

HE has not considered strong arguments and scheme improvements, presented at local consultations and by mail from Parish Councils over several years.

Through consultation and joint meetings, local Parish Councils are in general agreement with this HBPC report except for individual councillor's vested interests.

In line with Lord Hammond's comment at the House of Commons Transport Committee on 17 March 2021 we urge HE to carry a full review of data in light of a post Covid world.

We trust that the Planning Inspectorate will ensure that HE include the above concerns in a revised A358 Environmental Impact Assessment Scoping Report.

We further trust that the Planning Inspectorate will give our views and ideas full consideration and present them to the Secretary of State at the appropriate time.

30/4/21

APPENDIX 1

Comments from Hatch Beauchamp Residents

Proposed flyover at the Village road exit is visually bad and isolates many parts of our community.

Access to Ilminster is going to be very difficult through Ashill and then access to A358, especially when congestion from Southfields roundabout impacts that area.

Access to Capland is through unsuitable width roads for increased traffic flow.

Going West to Taunton remains unclear as new Thornfalcon design is vague. Fears that again access issues will be difficult if congestion builds from the new motorway roundabout.

Access to villages like Creech St Michael are possibly very difficult if the Henlade road is changed.

Emergency services may have difficulty if areas are not adequately and safely accessible, so our population/properties could be at risk.

New developments will only add to the new reduced quality of road layouts.

Overall the East and West ends of the 358 look unchanged, and these works proposed do not improve the congestion, but do reduce our options to move freely.

Agreed we do need better, safer access to the major road, but this seems to give us no better options with less choice and reduced community access.

Local requirements seem ignored to give us non beneficial inconvenience for the passing traffic volumes.

I want to make a point as a parishioner of West Hatch living on the east side of the A 358. We regularly attend West Hatch church, also, we have friends whom we often visit. If this mad idea goes ahead, the options of reaching our village without massive obstruction are pretty slim. If you looked at the A38 from the M5 going to Bristol airport, there are constant notices telling motorist to drive at 30 mph. Yes, people complain but it helps to keep the integrity of the villages in the surrounding area. All one has to do is add an extra 10 minutes onto the journey. It is all very well getting to the Southfields roundabout in super extra speedy time, but if this area is not given an update, ie, slip roads, then the bottlenecks will continue. Therefore, if we had sensible speed control there would be no need to spend millions on A, cutting our villages in half and B, a flyover in front of houses and cottages. There is nothing wrong with the A358. It is the junctions at either end which cause a problem.

The destruction necessary for this expressway breaks my heart. I was hoping the effects of the pandemic were going to lead to a reevaluation of our relationship with the earth and our voracious demand for material growth.

In my opinion what is the point in spending money on altering a road that has two major junctions that cause all the traffic problems. That is the roundabout at the M5 junction and the roundabout at the A303 junction. If these were improved then the A358 would not have to be improved. The proposed improvements will cause distress to many villages and the people who live there.

I do want to add my name to what must be a pile of disbelief to the newly announced Preferred Route. The A358 flows quite smoothly and several roads feed into it without a problem or slowing the traffic until you get to either end of it. The Taunton end is being dealt with and the success or otherwise remains to be seen. The roundabout at the other end which connects with many major

routes including the A303 is almost always backed up as are the roads feeding into it. This is the problem and dualling the A358 will make it a bigger problem.

APPENDIX 2

Post Covid working patterns

In a poll, a fifth of members of the motoring group the AA, said they would work more from home in future. This has implications for the UK government's £28bn road-building programme which assumes that traffic will rise by 1% per year - a conjecture that now looks unlikely. The AA, which for years was seen as the voice of motorists, has asked the government to think again about its £28bn road expansion. Its president, Edmund King, has suggested the money would be better spent on improving broadband.

Most office workers do not intend to spend five days a week in the workplace once the Covid-19 crisis is over, with both bosses and employees seeing home working as a long-term trend.. The pandemic has changed working patterns for good, a survey from the British Council for Offices (BCO) has found. In future white-collar workers will adopt a mixed approach, combining remote working with several days a week in the office.

<https://www.theguardian.com/business/2020/oct/05/covid-19-has-changed-working-patterns-for-good-uk-survey-finds>

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HSE email: NSIP.applications@hse.gov.uk

FAO Ms Alison Down
The Planning Inspectorate
Temple Quay House
Temple Quay
Bristol
BS1 6PN
By email only

Dear Ms Down,

22 April 2021

**PROPOSED A358 TAUNTON TO SOUTHFIELDS DUALLING SCHEME (the project)
PROPOSAL BY HIGHWAYS ENGLAND (the applicant)
INFRASTRUCTURE PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017 (as
amended) REGULATIONS 10 and 11**

Thank you for your letter of the 13 April 2021 regarding the information to be provided in an environmental statement relating to the above project. HSE does not comment on EIA Scoping Reports but the following information is likely to be useful to the applicant.

HSE's Land Use Planning Advice (CEM HD5 Contribution)

Will the proposed development fall within any of HSE's consultation distances?

With reference to **Figure 1.1 Proposed Scheme Location** contained within Highways England document **A358 Taunton to Southfields Dualling Scheme Environmental Impact Assessment Scoping Report - Volume 2: Figures HE551508-ARP-EGN-ZZ-RP-LE-000012 23/03/21** on which is shown a redlined area. Passing through the southernmost section of the redlined area are two Major Accident Hazard Pipelines operated by National Grid Gas PLC:

- 14 Feeder Barrington / Kenn [Transco ref: 1530, HSE ref: 7262]
- 20 Feeder Ilchester / Ottery St. Mary [Transco ref: 1531, HSE ref: 7263]

The redlined area does not currently fall within the consultation distances of any Major Accident Hazard Installation(s).

At this stage of the consultation process it is not possible for HSE to provide an indication of its public safety Land Use Planning advice; There is currently insufficient information available to determine to what extent the proposed development will impact on new or existing populations (permanent or temporary) that may fall within Major Accident Hazard Pipeline(s) HSE's public safety consultation zones.

Please note if at any time a new Major Accident Hazard Pipeline is introduced or existing Pipeline modified prior to the determination of a future application, then the HSE reserves the right to revise its advice.

Likewise if prior to the determination of a future application, a Hazardous Substances Consent is granted for a new Major Hazard Installation or a Hazardous Substances Consent is varied for an existing Major Hazard Installation in the vicinity of the proposed project, then again the HSE reserves the right to revise its advice.

Would Hazardous Substances Consent be needed?

The presence of hazardous substances on, over or under land at or above set threshold quantities (Controlled Quantities) may require Hazardous Substances Consent (HSC) under the Planning (Hazardous Substances) Act 1990 as amended. The substances, alone or when aggregated with others, for which HSC is required, and the associated Controlled Quantities, are set out in The Planning (Hazardous Substances) Regulations 2015.

Hazardous Substances Consent would be required if the proposed development site is intending to store or use any of the Named Hazardous Substances or Categories of Substances and Preparations at or above the controlled quantities set out in schedule 1 of these Regulations.

Further information on HSC should be sought from the relevant Hazardous Substances Authority.

Explosives sites

HSE has no comment to make as there are no licensed explosives sites in the vicinity.

Electrical Safety

No comment from a planning perspective.

During lockdown, please send any further communication on this project directly to the HSE's designated e-mail account for NSIP applications at nsip.applications@hse.gov.uk. We are currently unable to accept hard copies, as our offices have limited access.

Yours sincerely,

Monica

Monica Langton
CEMHD4 NSIP Consultation Team



Ms Alison Down
The Planning Inspectorate
Environmental Services, Operations
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Bristol
BS1 6PN

Direct Dial: [REDACTED]

Our ref: PL00745222

23 April 2021

Dear Ms Down

**The Town and Country Planning (Environmental Impact Assessment)
Regulations 2017
ENVIRONMENTAL IMPACT ASSESSMENT (EIA) SCOPING REPORT**

Thank you for your letter of 26 March 2021 consulting Historic England about the Environmental Impact Assessment (EIA) scoping report for the A358 Taunton to Southfields Dualling Scheme.

Historic England Advice

Historic England has reviewed the information submitted in the A358 Taunton to Southfields Dualling Scheme EIA Scoping Report - Volume 1: Main Report (dated 23/03/21) and associated figures together with our own records for the proposed development area. In our view this development could, potentially, have an impact upon a number of designated heritage assets and their settings in the area around the site.

General Advice

This letter sets out guidance on the process and level of information that should be included within the EIA documentation to enable the impact of the proposed development on the historic environment to be assessed.

a) Requirements under the National Networks National Policy Statement

In line with the advice in the National Networks National Policy Statement (NPS), we would expect the Environmental Statement to contain a thorough assessment of the likely effects which the proposed development might have upon those elements which contribute to the significance of heritage assets (NNPS Para 5.126 -7) and on the historic environment generally. In this way it should be possible to identify (and where possible avoid, minimise or if appropriate mitigate) any direct or indirect impacts on assets of local, regional and national importance (NPS Para 5.120





- 5.142).

b) General Considerations

In general terms, Historic England advises that a number of considerations will need to be taken into account when proposals of this nature are being assessed. In order for the potential impacts of the proposals and any ancillary infrastructure on the significance of both designated and non-designated heritage assets to be fully understood, we would recommend that the assessment takes the following issues into account:

- The potential impact upon the landscape, especially if a site falls within an area of historic landscape;
- Direct impacts on historic/archaeological fabric (buildings, sites or areas), whether statutorily protected or not;
- Other impacts, particularly the setting of listed buildings, scheduled monuments, registered parks and gardens, conservation areas etc., including long views and any specific designed views and vistas within historic designed landscapes. All grades of listed buildings should be identified. In some cases, intervisibility between historic sites may be a significant issue;
- The potential for buried archaeological remains;
- Effects on landscape amenity from public and private land;
- Cumulative impacts.

The level of carefully considered information required will need to be proportional to the severity of the potential issues which may arise from any proposed scheme, and directly related to the need to assess the overall sustainability of any development proposals.

Site Context

The route is approximately 8.5 miles in length and located between junction 25 of the M5 at Taunton and A303 at Southfields Roundabout near Ilminster. The scoping opinion has identified that there are a high proportion of heritage assets within 1km of the route.

a) Designated Heritage Assets within the Scoping Area

The scoping report lists 141 listed buildings including 4 grade I listed structures designated due to their exceptional special interest and 10 listed at grade II* due to their more than special interest. These include several churches which form spiritual and visual reference points within the landscape and prominent secular properties, which often have a close functional and/or aesthetic association to their setting. We note that other assets have been identified by the scoping report at greater distance



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from the scheme.

We would draw your attention, in particular although not exclusively, to the following:

- Musgrave Farmhouse, Grade II* (National Heritage List for England No. 1177045);
- Henlade House, Grade II* (National Heritage List for England No 1060397);
- Church of St Aldhelm and St Eadburgha, Grade I (National Heritage List for England No. 1248192) and the scheduled cross in its churchyard (SM 32155; National Heritage List for England No 1017250);
- Hatch Beauchamp complex associated with the grade I listed Hatch Court (National Heritage List for England No 1060405) and the grade II Registered Park and Garden (National Heritage List for England No 1001146); and
- Rowlands Farm and Mill, both listed at grade II*(National Heritage List for England No 1057097 and 1345847);
- Further afield is Castle Neroche a scheduled monument of national importance (SM 24006; National Heritage List No 1008252).

b) Non-Designated Heritage Assets within the Scoping Area

The Heritage Assessment should also consider the potential impacts on non-designated features of historic, architectural, archaeological or artistic interest, since these can also be of national importance and make an important contribution to the character and local distinctiveness of an area and its sense of place. Contact information is available via the local authority Historic Environment Record (www.heritagegateway.org.uk) and relevant local authority staff.

It should also be remembered that non-designated heritage assets, including archaeological remains, can contribute to the significance a designated heritage asset derives from its setting. It is important therefore to ensure that the historic environment assessment is integrated across the scheme and does not result in separate consideration of designated and non-designated assets.

Your consultants should seek input from the conservation officers at South Somerset District Council and Somerset West and Taunton Council for additional guidance on listed buildings, conservations areas and non-designated heritage assets to that set out above. In respect of non-designated archaeological remains, you should seek input from the archaeological advisers at the South West Heritage Trust.

Both parties will be able to assist with providing you with a better understanding of the local historic environment issues and priorities; how the proposal can be tailored to avoid and minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets.





Methodology of Assessment & Relevant Published Guidance

a) Historic England Published Advice

The methodology for and resulting heritage assessment should take full account of the most recent published advice including:

- *Historic Environment Good Practice Advice in Planning Notes (GPA1-3):* [<https://historicengland.org.uk/advice/planning/planning-system/>](https://historicengland.org.uk/advice/planning/planning-system/) in particular GPA 3 on The Setting of Heritage Assets (2nd edition 2017);
- *Historic England Advice Note 12: Statements of Heritage Significance: Analysing Significance in Heritage Assets (Historic England 2019);*
- *Conservation Principles, Policies and Guidance: Sustainable Management of the Historic Environment (English Heritage, 2008)* [<https://historicengland.org.uk/advice/constructive-conservation/conservation-principles/>](https://historicengland.org.uk/advice/constructive-conservation/conservation-principles/)

b) Design Manual for Roads and Bridges (DMRB)

There is a presumption within the scoping report that favours the DMRB methodology for the assessment of the historic environment. It is essential that the methodology also takes account of Historic England guidance which holds equivalent status to that of DMRB.

Whilst we appreciate the need to produce an assessment in line with DMRB and EIA regulations, we have reservations regarding the sole use of a tabular and atomised approach to the assessment of impact on individual heritage assets. In our view, this approach fails to properly engage with the nature of the significance of the assets and their relationships with each other, the surrounding topographic landscape, and their shared historic and archaeological landscape context. We consider that such matrices tend to confuse concepts of the significance, sensitivity and magnitude of impact whilst atomising complex relationships between features and apparent impacts.

c) GPA3 - Stepped Approach

As setting and views are matters of qualitative and expert judgment, we usually advise that this issue is addressed by ensuring that technical heritage analyses of this type are provided in support of a clearly expressed and non-technical narrative argument that sets out 'what matters and why' in terms of the heritage significance and setting of the assets affected, together with the effects of the development upon them (Historic England GPA3 2017, 8).

This approach should take its cue from the sensitivity of individual assets and groups





of assets which could be a combination of above and below ground assets as well as designated and non-designated.

The assessment needs to consider the specific types of change associated with the proposed development and what capacity the heritage assets have to absorb the effects of such change within their settings. We consider that an approach of this nature provides a more meaningful context for discussion, over one based on an assessment of sensitivity in line with the relative value of individual assets, which does not take into consideration other factors.

Historic England therefore recommends that an approach to the significance of designated heritage assets is reflective of the assessment criteria for the designation process, can be easily understood within the language of the NPPF regarding the significance of heritage assets and the impact of proposals on that significance. It will allow for the significance of the assets and their relationships with each other, the surrounding topographic landscape, and their shared historic and archaeological landscape context to be better articulated and understood.

Historic England's published guidance including HEAN 12 and GPA3 sets out a particularly useful stepped approach for assessing the impact of a development on the significance of the heritage asset. We encourage their use in order to allow for a more cohesive approach to the assessment.

d) Determination of Assessment Area

Historic England would expect the assessment to clearly demonstrate that the extent of the proposed study area is of the appropriate size to ensure that all heritage assets likely to be affected by this development have been included and can be properly assessed. Any assessment should be based on an understanding of the relationship between the assets and the development site rather than being based on an arbitrary distance away.

The assessment will need to include a clear methodology setting out how individual assets (particularly those outside the main study area) will be scoped in or out of the EIA. This should make use of a robust evidence base such as Zones of Theoretical Visibility (ZTV) to clearly articulate the definition of the study area.

e) Relationship with Landscape and Visual Impact Assessment in Identification of Key Viewpoints

In general, we recommend that there should be a close relationship between the Landscape and Visual Impact Assessment (LVIA) and the Heritage Assessments. Heritage Assets are key visual receptors and any impact upon them would need to be considered in depth with appropriate selection of viewpoints relevant to the





significance of the assets in question and the likely impacts.

We would recommend the inclusion of long views and any specific designed or historically relevant views and vistas within this historic landscape. The heritage consultants and consultees should be actively involved with the selection of views to demonstrate the impact on specific heritage assets and key designed views in order to ensure that sufficient information has been provided. This should ensure that viewpoints specifically related to the significance of individual designated assets are identified in addition to the inclusion of viewpoints more representative of general landscape character.

We have identified a number of sites that should be considered. This list includes Musgrave Farmhouse, Henlade House and views from within Hatch Beauchamp in particular designed views from within the registered landscape to the west. Further consideration may need to be given to the complex at Rowlands Farm as well as the assets at the Church of St Aldhelm and St Eadburgha.

This is not an exhaustive list, and through the assessment process the heritage consultants should identify any sensitive site that should be included within LVIA.

f) Landscape Character

This type of proposal can introduce significance change to landscape character. We advise that the EIA should ensure sufficient consideration is given to understanding the unique character of the historic landscape. This can assist in ensuring that the scheme is able to meet the challenges associated with the need to avoid, minimise or appropriately mitigate any harmful impacts through a sensitive response to those historic surroundings in the detailing and quality of any proposals.

g) Scheme Visualisations and Drawings

It is important that the assessment is designed to ensure that all impacts are fully understood. Section drawings and techniques such as photomontages are a useful part of this.

It is important that the heritage consultant is engaged in the process of picking the viewpoints in relation to any heritage receptors.

Photomontages are an extremely useful tool in understanding the potential visual impact of a scheme. Where montages are provided, these should look to show the impact of both the construction and operation phases. They should demonstrate the impact of the scheme over a period of time, for example at the point of completion, after 1 year and 15 years. This will allow the EIA process to assess the effect of any proposed mitigation work as it reaches maturity but also to assess whether this in itself





might be likely to have an impact on, for example, historic landscape character or within the setting of a designated heritage asset.

We would note our request to ensure that long sections are provided to help articulate changes in height from the existing levels in order to better understand what the impact on the identified heritage assets would be. These drawings/landscape profiles should illustrate the proposed surface height of the completed road in relation to the existing and where individual assets are affected in key views from or towards those or within which the road and the asset will be seen in conjunction with each other.

Furthermore, we would specifically request further details of the offline portion of the scheme through Henlade. This should include sections showing any cut and fill, long and short in order to better understand the potential impact in views from the grade II* listed Musgrove Farmhouse and Henlade House.

h) Other Environmental Factors Affecting Significance within Setting

Setting is not limited to views alone and consideration should be given to the elements that could impact on the experience of place. Some of these such as noise and vibration and air quality will be assessed within the EIA. Their conclusions need to be incorporated into the heritage assessment, explaining what the result of any changes would be on the significance of the asset.

We would advise that regardless of where these environmental factors are included within the EIA, heritage assets must be considered as sensitive receptors in their own right, not just their residents or visitors to them.

i) Temporary Effects

The EIA needs to assess all construction impacts including any temporary changes. One area that will require careful consideration is the phasing of works and the impact of any road closures on the surrounding historic landscape through the introduction, for example, of diversions that might bring traffic in closer proximity to designated heritage assets. The impact on individual and groups of assets will need to be considered in order to avoid and minimise any harm.

j) Other Environmental Factors for Assessment

The assessment should take account of the potential impact which associated activities (such as construction, servicing and maintenance, and associated traffic) might have upon perceptions, understanding and appreciation of the heritage assets in the area.

The assessment should also consider, where appropriate, the likelihood of alterations





to drainage patterns that might lead to in situ decomposition or destruction of below ground archaeological remains and deposits and can also lead to subsidence of buildings and monuments.

Recommendation

Thank you for consulting Historic England at this stage of the proposals.

We would urge Highways England to address the issues set out above to ensure that the Environmental Impact Assessment will provide a sound basis on which to assess the significance of any heritage assets affected and the effect on significance of the impacts of the proposed scheme. A sound EIA report is the basis on which to identify (and where possible avoid, minimise or mitigate) what may be substantial direct and indirect impacts on assets of local, regional and national importance.

Given the potential for the scheme to affect designated heritage assets within the area, we would welcome further joint discussions with Highways England and the relevant local authority advisers in order to agree the key sites and setting issues and approaches which will need to be addressed within the EIA.

Yours sincerely,

Rhiannon Rhys

Rhiannon Rhys
Inspector of Historic Buildings and Areas
[REDACTED]@HistoricEngland.org.uk



Alison Down
EIA Director
Environmental Services



Tel:

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Your Ref:

Date: 23rd April 2021

My Ref: 21/00597/PE

Contact: Angharad Williams
Area Team Leader

Dear Alison Down

**Proposal: Consultation Request: A358 Taunton to Southfields Dualling Scheme
(Reference: TR010061-000008)**
Location: A358 Taunton to Southfields Dualling Scheme

Thank you for consulting us on the above proposals.

At this time, the Local Planning Authority have no comments to make regards the proposals.

With kind regards,

Miss Angharad Williams

From: [REDACTED]
To: [A358 Taunton to Southfields](#)
Subject: T2SF - A358 Taunton to Southfields Dualling Scheme - EIA Scoping Notification and Consultation (NE ref: 350277)
Date: 30 April 2021 13:58:00
Attachments: [image002.png](#)

Dear Alison

Thank you for consulting us on the above, received on 09/04/21.

From our perspective, we advise that the EIA Scoping Report is satisfactory and we have no comments to make.

Kind regards

Darren Horn
Lead Planning Adviser
Somerset Team
Natural England

Sterling House, Dix's Field,
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Tel: [REDACTED]
[REDACTED]



For new consultations or to provide further information on existing consultations please send all correspondence to consultations@naturalengland.org.uk

Follow us on Twitter: [@NESouthWest](#)

Neroche Parish Council's response to Highways England proposal for the A358 link roads into Bickenhall.

On 22nd April an Extraordinary Meeting of the Parish Council was held to discuss the A358 proposal and the impact on our parishes. All 10 councillors were present. The Parish Clerk, the District Councillor and over 30 parishioners were also present.

Below is the agreed outcomes of the meeting and feedback we would like to be put forward to Highways England.

This document refers specifically to the link roads into Bickenhall, part of the Neroche Parish Council- referring to Figure 2.2 (Junctions and Local Roads) on the Highways England Proposal A358 Taunton to Southfields Dualling Scheme.

Highways England are proposing the closure of Bickenhall Lane and using as the main access point to the A358 the road that leads to Capland, referred to as Staple Fitzpaine Road in this document.

- It was agreed by all present that *neither* the Staple Fitzpaine Road nor Bickenhall Lane are suitable to be the main road linking Bickenhall to the A358. Both these options are single lane roads, with insufficient passing points. Neither road is suitable or wide enough to withstand the increased traffic of farm vehicles and other business delivery vans, lorries, and cars.
- By closing one of these routes, the traffic on the remaining road will increase enormously as most of the traffic uses the Bickenhall Lane route currently. This will have a dramatic impact on all those who live on, or near, the lane or use the lane for their leisure purposes.
- Whilst acknowledging that neither road is fit for this new purpose, we understand the need to have an access point to the A358 for our villages. Therefore, it was agreed that Staple Fitzpaine Road is our preferred choice, in line with the proposal from Highways England. Although the new A358 will create a barrier between communities, thereby segregating villages, this option provides locals with some social mobility and access to Hatch Beauchamp and was seen as the lesser of two evils.
- For the Staple Fitzpaine Road to be the main access point, there are improvements required to the road which are vital for both road safety and quality of life for those who live in the immediate area. These improvements are as follows:
 - Upgrading the route to include more passing points to be created in the lane. This single-track road does not currently have enough passing points, meaning all vehicles, large and small, are frequently required to reverse a significant distance to enable the flow of traffic. This is clearly a safety issue which needs to be addressed.
 - The Staple Fitzpaine Road will need re-surfacing as much of the carriageway has been worn away. There are sections of the route that abut a deep stream bed, which even with the current limited traffic flows, continually has issues with collapsing into the stream. This will be greatly exacerbated by the increased traffic levels.

- The bridge on the Staple Fitzpaine Road is not robust enough to accommodate any increase in traffic flow, and therefore, needs to be improved. The banks fall away to the side of the bridge, with over a 3-metre drop, with very weak barriers currently in place. There will be a greater risk of vehicles going off the road, into the river, due to increased traffic and congestion.
- The Staple Fitzpaine Road, like many roads in Bickenhall, often floods in the winter months, making it impassable. We wish to know how the road drainage will be improved.
- To aid the noise reduction from the A358, and the general environmental impact to the community, we would like the planting of trees and hedges along the road, with high banks where the topography allows, to act as noise barriers.
- To mitigate the additional noise, we insist on low noise road surface for the A358.
- Currently there is no lighting on either the Staple Fitzpaine Road or our section of the A358, we would like this to remain the same, to avoid any further light pollution.

From: [REDACTED]
To: [A358 Taunton to Southfields](#)
Subject: FW: TR010061-000008- A358 Taunton to Southfields
Date: 23 April 2021 12:22:00
Attachments: [image001.png](#)



Network Rail
1st Floor
Bristol Temple Point
Bristol
BS1 6NL

My Ref: P/TP21/199
Your Ref: TR010061-000008

Date: 23 April 2021

TOWN AND COUNTRY PLANNING ACT 1990 (as amended)

APPLICATION NO: TR010061-000008
PROPOSAL: Application by Highways England (the Applicant) for an Order granting Development Consent for the A358 Taunton to Southfields Dualling Scheme (the Proposed Development)
LOCATION: A358 Taunton to Southfields

Dear Sir/Madam,

Thank you for your email dated **26 March 2021** together with the opportunity to comment on this proposal.

Network Rail have no objection in principle to the above proposal for an Order granting Development Consent for the A358 Taunton to Southfields.

The physical proposal impacts the highway network from the M5 junction 25 roundabout to the A303 roundabout at Southfields with no physical activity directly impacting Network Rail. The area of influence extended to MLN1 161m 40c, and during the construction phase an increase in queuing traffic may be experienced over our structures in this location.

There is no objection from Structures providing the proposal has no direct impact on any Network Rail Structures (as a result of indirect influence such as increased regular traffic over our Structures). Due to the large extent of the proposal if the proposer feels at any point during the scheme that they might end up carrying out works near any Network Rail Structures that my impact them in any way we would require that they contact us prior to those works. The proposer should also be aware that the existing bridge has a weight limit and this must be respected as with any other proposal.

Yours Sincerely,

Grace Lewis
Town Planning Technician Wales and Western
Network Rail
Temple Point, Redcliffe Way, Bristol, BS1 6NL
E: [REDACTED]@networkrail.co.uk
www.networkrail.co.uk/property

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Network Rail Infrastructure Limited registered in England and Wales No. 2904587, registered office Network Rail, 2nd Floor, One Eversholt Street, London, NW1 2DN

From: [REDACTED] on behalf of [ONR Land Use Planning](#)
To: [A358 Taunton to Southfields](#)
Subject: RE: T2SF - A358 Taunton to Southfields Dualling Scheme - EIA Scoping Notification and Consultation
Date: 30 March 2021 11:04:02
Attachments: [image001.png](#)

Good morning,

This application is not within an ONR Land Use Planning consultation zone, therefore ONR have no comment to make.

You can find information concerning our Land Use Planning consultation process here:
(<http://www.onr.org.uk/land-use-planning.htm>).

Kind regards

Vicki

Vicki Enston

Regulatory Officer
Land Use Planning
Emergency Preparedness & Response
Office for Nuclear Regulation

E: ONR-Land.use-planning@onr.gov.uk



The Office for Nuclear Regulation's mission is to provide efficient and effective regulation of the nuclear industry, holding it to account on behalf of the public.

Website: www.onr.org.uk **Twitter:** [@ONRpressoffice](https://twitter.com/ONRpressoffice)

Our Ref: RK/SMP

Your Ref: A358 Taunton to Southfields Dualling Scheme

Date: 21 April 2021

Environmental Services
Operations
Temple Quay House
2 The Square
Bristol
BS1 6PN

Dear Sir/Madam

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017(the EIA Regulations) – Regulations 10 and 11

Application by Highways England (the Applicant) for an Order granting Development Consent for the A358 Taunton to Southfields Dualling Scheme (the Proposed Development)

Scoping consultation and notification of the Applicant's contact details and duty to make available information to the Applicant if requested

Thank you for giving the Parrett Internal Drainage Board the opportunity to comment in this Scoping consultation. The Board has examined the report and has the following comments to make.

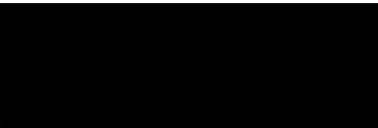
In its current configuration, the Proposed Development lies outside of the Board District however, surface water flows from the Proposed Development is likely to discharge into catchments where the Board has a duty to exercise a general supervision over all matters relating to the drainage of land within its District. This extends to duties with regard to the environment, and comments are made with that in mind.

Sustainable Drainage, if correctly implemented, can have a positive impact on water quality and flow control however, because of the topography of the locality the wider Parrett catchment is very slow reacting. Water is present within the catchment for a considerable time before making its way to sea, which is further constrained by the tide. This is why control of the volume and flow in the catchment is a key issue for the Drainage Board.

Without mitigation, the increase in impermeable area can have a significant detrimental impact on the environment and flood risk. The control of volume of flow is essential to the implementation of an effective sustainable drainage scheme.

Due to the above, the Board believes that section 14 of the report: 'Road drainage and the water environment' should be scoped into the Environmental Impact Assessment.

Yours faithfully


Rob Kidson
Development Control Officer

Cc 



Public Health
England

Environmental Hazards and
Emergencies Department
Centre for Radiation, Chemical and
Environmental Hazards (CRCE)
Seaton House
City Link
London Road
Nottingham
NG2 4LA

nsipconsultations@phe.gov.uk

www.gov.uk/phe

Your Ref: TR010061-000008

Our Ref: CIRIS 57092

Adrian Chadwick
EIA Advisor, Environmental Services Team
Major Casework Directorate
The Planning Inspectorate
Temple Quay House
Temple Quay
Bristol, BS1 6PN

23rd April 2021

Dear Mr Chadwick

**Nationally Significant Infrastructure Project
T2SF - A358 Taunton to Southfields Dualling Scheme - EIA Scoping Notification and
Consultation - Scoping Consultation Stage**

Thank you for including Public Health England (PHE) in the scoping consultation phase of the above application. Advice offered by PHE is impartial and independent.

PHE exists to protect and improve the nation's health and wellbeing and reduce health inequalities; these two organisational aims are reflected in the way we review and respond to Nationally Significant Infrastructure Project (NSIP) applications.

The health of an individual or a population is the result of a complex interaction of a wide range of different determinants of health, from an individual's genetic make-up, to lifestyles and behaviours, and the communities, local economy, built and natural environments to global ecosystem trends. All developments will have some effect on the determinants of health, which in turn will influence the health and wellbeing of the general population, vulnerable groups and individual people. Although assessing impacts on health beyond direct effects from for example emissions to air or road traffic incidents is complex, there is a need to ensure a proportionate assessment focused on an application's significant effects.

Having considered the submitted scoping report, we wish to make the following specific comments and recommendations:

Environmental Public Health

We understand that the promoter will wish to avoid unnecessary duplication and that many issues including air quality, emissions to water, waste, contaminated land etc. will be covered elsewhere in the Environmental Statement (ES). We believe the summation of relevant issues into a specific section of the report provides a focus which ensures that public health is given adequate consideration. The section should summarise key information, risk assessments, proposed

mitigation measures, conclusions and residual impacts, relating to human health. Compliance with the requirements of National Policy Statements and relevant guidance and standards should also be highlighted.

In terms of the level of detail to be included in an ES, we recognise that the differing nature of projects is such that their impacts will vary. The attached appendix summarises PHE's requirements and recommendations regarding the content of and methodology used in preparing the ES. Please note that where impacts relating to health and/or further assessments are scoped out, promoters should fully explain and justify this within the submitted documentation.

Recommendations

Air Quality

We note the applicant's intention to 'scope out' the assessment of particulate matter (PM₁₀) emissions and concentration changes from the ES. Although it may be anticipated that the bypass will improve air quality as sections of the A358 are realigned, there are no details, or identification of, any sensitive receptors (population, residences etc.) within 200 metres of the proposed scheme. From the maps of the proposed scheme included in the scoping documentation, there are many villages and residential properties that are shown to be in the direct vicinity of the proposed A358. We therefore would recommend that an assessment should be undertaken to ascertain the potential impacts of particulate matter (PM₁₀) on these local receptors with regards to local air quality. We consider that this assessment should be provided to allow an assessment of the potential population health impacts.

Our position is that pollutants associated with road traffic or combustion, particularly particulate matter and oxides of nitrogen are non-threshold; i.e. an exposed population is likely to be subject to potential harm at any level and that reducing public exposures of non-threshold pollutants (such as particulate matter and nitrogen dioxide) below air quality standards will have potential public health benefits.

We support approaches which minimise or mitigate public exposure to non-threshold air pollutants, address inequalities (in exposure), maximise co-benefits (such as physical exercise). We encourage their consideration during development design, environmental and health impact assessment, and development consent.

Noise

As the application is for a highway development, we have included guidance on the effects of noise on public health and wellbeing in Appendix B. Our guidance pertaining to noise is informed by the recommendations in the 2018 Environmental Noise Guidelines for the European Union published by the World Health Organization (WHO) and high-quality systematic reviews of the scientific evidence.

Human Health and Wellbeing

This section of our scoping response, identifies the wider determinants of health and wellbeing we expect the ES to address, to demonstrate whether they are likely to give rise to significant effects. We have focused our approach on scoping determinants of health and wellbeing under four themes, which have been derived from an analysis of the wider determinants of health mentioned in the National Policy Statements. The four themes are:

- Access
- Traffic and Transport
- Socioeconomic

- Land Use

Having considered the submitted scoping report we wish to make the following specific comments and recommendations:

Methodology

Temporal scope and reporting

The proposed 4-year construction timeline results in the need for very clear reporting on the temporal impacts and effects on the local population. In this context “temporary” impacts can extend over long periods, but the scoping report does not comment on how the temporal scope will be defined.

Recommendation

The reporting within the Preliminary Environmental Information and Environmental Statements (PEIR) should ensure a consistent, transparent and accurate approach to the reporting of temporary effects.

Population and human health

The scoping report does not identify any aspects to be scoped out of the assessment for population and human health. The list of wider determinants to be scoped into the ES, by the applicant, are very broad descriptions and each will contain an important range of potential impacts on health and wellbeing.

Table 1 (Appendix 1) lists the wider determinants, as a minimum, that should be scoped into an assessment of effects on population and human health under the broad descriptions identified within the scoping report.

Should the applicant wish to scope out any of these determinants the PEIR must provide adequate justification in accordance with the Planning Inspectorate Advice Note Seven (Environmental Impact Assessment: Process, Preliminary Environmental Information and Environmental Statements).

Recommendations

The report indicates that the ES will scope in population and housing, which should include an assessment of the potential impacts for non-home based construction workers, subject to the size and nature of the construction workforce.

The scoping report includes economic activity and impact on businesses, as such PHE expects the ES to assess and report on local economic impacts and social value where possible.

The consideration of the loss of private property must consider the potential vulnerability of the occupants. It is acknowledged that the assessment does not consider individual effects, but the sensitivity of the population at risk should be assessed and proportionate mitigation measures proposed.

Mental health

The scoping report accepts the broad definition of health proposed by the WHO and we welcome the specific reference to mental health. Mental well-being is fundamental to achieving a healthy, resilient and thriving population. It underpins healthy lifestyles, physical health, educational attainment, employment and productivity, relationships, community safety and cohesion and quality of life. A scheme of this scale and nature has impacts on the over-arching protective factors, which are:

- Enhancing control

- Increasing resilience and community assets
- Facilitating participation and promoting inclusion.

The scoping report identifies potential significant impacts on mental health and social community cohesion due to land take and the demolition of private domestic property.

Recommendation

There should be parity between mental and physical health, and any assessment of health impact should include the appreciation of both. A systematic approach to the assessment of the effects on mental health, including suicide, is required.

The PEIR should reference the methodology used to complete assessments for the effects on mental health and wellbeing. The Mental Well-being Impact Assessment (MWIA), could be used as a methodology. The assessment should identify vulnerable populations and provide clear mitigation strategies that are adequately linked to any local services or assets.

Robust and meaningful consultation with the local community will be an important mitigation measure, in addition to informing the assessment and subsequent mitigation measures.

Baseline health data

The scoping report provides the high-level baseline health data, including inequalities (IMD) and notes the intention to consult with the local Director of Public Health. This consultation should identify local priorities, including health inequalities. The assessment should include any positive or negative impacts on health inequalities.

Recommendation

The baseline health data should also include data regarding local mental health and wellbeing and details of how impacts on community cohesion will be considered.

The scoping report should include baseline health data available from the local Joint Strategic Needs Assessment (JSNA) and any Integrated Care System (ICS) plans, in addition to data provided by the Director of Public Health.

The ES should assess and report on any significant effects on health inequalities.

Physical activity and active travel / access to open space

The scoping report identifies significant potential impact through the loss or change in formal Public Rights of Way (PRoW), open space and the existing road network. Active travel forms an important part in helping to promote healthy weight environments and as such it is important that any changes have a positive long term impact where possible. Changes to routes have the potential to impact on usage, create displacement to other routes and potentially lead to increased road traffic collisions.

It is important to ensure that any impact on tranquillity in open spaces is considered.

Recommendations

The overall risk to walkers, cyclists and horse riders (WCH) and impact on active travel should be considered on a case-by-case basis, taking into account, the number and type of users and the effect that the temporary traffic management system will have on their journey and safety.

The scheme should continue to identify any additional opportunities to contribute to improved infrastructure provision for active travel and physical activity.

The potential significant impacts on public rights of way (PRoW) and the cycle network will require detailed consultation with the local community and the local authority, particularly to identify latent demand.

Any loss of accessible open space must include an assessment on equitable access to the local communities and the need to provide an alternative provision.

Yours sincerely

For and on behalf of Public Health England
nsipconsultations@phe.gov.uk

Please mark any correspondence for the attention of National Infrastructure Planning Administration.

Appendix: PHE recommendations regarding the scoping document

Introduction

The Planning Inspectorate's Advice Note 11: Working with Public Bodies covers many of the generic points of interaction relevant to the Planning Inspectorate and Public Health England (PHE). The purpose of this Annex is to help applicants understand the issues that PHE expect to see addressed by applicants preparing an Environmental Statement (ES) as part of their Nationally Significant Infrastructure Planning (NSIP) submission.

We have included a comprehensive outline of the type of issues we would expect to be considered as part of an NSIP which falls under the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations). PHE encourages applicants to contact us as early in the process as possible if they wish to discuss or clarify any matters relating to chemical, poison, radiation or wider public health.

General Information on Public Health England

PHE was established on 1 April 2013 to bring together public health specialists from more than 70 organisations into a single public health service. We are an executive agency of the Department of Health and are a distinct delivery organisation with operational autonomy to advise and support government, local authorities and the National Health Service (NHS) in a professionally independent manner.

We operate across 4 regions in England and work closely with public health professionals in Wales, Scotland and Northern Ireland, and internationally.¹ We have specialist teams advising on specific issues such as the potential impacts of chemicals, air quality, ionising and non-ionising radiation and other factors which may have an impact on public health, as well as on broader issues such as the wider determinants of health, health improvement and health inequalities.

PHE's NSIP related roles and responsibilities and geographical extent

PHE is a statutory consultee in the NSIP process for any *applications likely to involve chemicals, poisons or radiation which could potentially cause harm to people and are likely to affect significantly public health.*² PHE will consider the potential significant effects (direct and indirect) of a proposed development on population and human health and the impacts from chemicals, radiation and environmental hazards.

Under certain circumstances PHE may provide comments on ionising radiation to/on behalf of the Scottish Parliament. If a proposer is submitting a planning application in Scotland which may require advice on radiation you are recommended to contact the appropriate Scottish Planning Authority for advice on how to proceed.

In the case of applications in Wales, PHE remains a statutory consultee but the regime applies to a more limited range of development types. For NSIP applications likely to affect land in Wales, an applicant should still consult PHE but, additionally will be required to consult the Welsh Ministers.

Role of Public Health England and NSIP with respect to Environmental Impact Assessments

PHE has a statutory role as a consultation body under the EIA Regulations. Where an applicant has requested a scoping opinion from the Planning Inspectorate³ in relation to a proposed NSIP, PHE will be consulted by the Planning Inspectorate about the scope, and level of detail, of the information to be provided in the ES and will be under a duty to make information available to the applicant. PHE's standard recommendations in response to EIA scoping consultations are below.

¹ <https://www.gov.uk/government/organisations/public-health-england/about#priorities>

² The Infrastructure Planning (Interested Parties and Miscellaneous Prescribed Provisions) Regulations 2015

³ The scoping process is administered and undertaken by the Planning Inspectorate on behalf of the Secretary of State

PHE also encourages applicants to discuss with them the scope of the ES at an early stage to explore, for example, whether careful site selection or other design issues could minimise or eliminate public health impacts or to outline the requirement for, scope and methodology of any assessments related to public health.

PHE's recommendations to applicants regarding Environmental Impact Assessments

General approach

Applicants are reminded that Section 5(2)(a) of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 specifically includes a requirement that the EIA must identify, describe and assess in an appropriate manner, in light of each individual case, the direct and indirect significant effects of the proposed development on population and human health.

PHE is of the opinion that this requirement encompasses the wider determinants of public health, as well as chemicals, poisons and radiation. Further information on PHE's recommendations and requirements is included below.

It is the role of the applicant to prepare the ES. PHE provides advice relating to EIA within this document and during the NSIP consultation stages.

When preparing an ES the applicant should give consideration to best practice guidance such as the Government's Handbook for scoping projects: environmental impact assessment⁴, IEMA Guide to Delivering Quality Developments⁵, and Guidance: on Environmental Impact Assessment⁶

The Planning Inspectorate's Advice Note Seven: Environmental Impact Assessment: Process, Preliminary Environmental Information and Environmental Statements also provide guidance to applicants and other persons with interest in the EIA process as it relates to NSIPs. It is important that the submitted ES identifies and assesses the potential public health impacts of the activities at, and emissions from, the development.

PHE understands that there may be separate sections of the ES covering the assessment of impacts on air, land, water and so on, but expects an ES to include a specific section summarising potential impacts on population and health. This section should bring together and interpret the information from other assessments as necessary. The health and population impacts section should address the following steps.

1. Screening: Identify and significant effects.
 - a. Summarise the methodologies used to identify health impacts, assess significance and sources of information
 - b. Evaluate any reference standards used in carrying out the assessment and in evaluating health impacts (e.g., environmental quality standards)
 - c. Where the applicant proposes the 'scoping out' of any effects a clear rationale and justification should be provided along with any supporting evidence.
2. Baseline Survey :
 - a. Identify information needed and available, Evaluate quality and applicability of available information
 - b. Undertake assessment

⁴ <https://www.gov.uk/government/publications/handbook-for-scoping-projects-environmental-impact-assessment>

⁵ <https://www.iema.net/assets/newbuild/documents/Delivering%20Quality%20Development.pdf>

⁶ <https://www.gov.uk/guidance/environmental-impact-assessment#the-purpose-of-environmental-impact-assessment>

3. Alternatives:
 - a. Identify and evaluate any realistic alternative locations, routes, technology etc.
4. Design and assess possible mitigation
 - a. Consider and propose suitable corrective actions should mitigation measures not perform as effectively predicted.
5. Impact Prediction: Quantify and Assess Impacts:
 - a. Evaluate and assess the extent of any positive and negative effects of the development. Effects should be assessed in terms of likely health outcomes, including those relating to the wider determinants of health such as socio-economic outcomes, in addition to health outcomes resulting from exposure to environmental hazards. Mental health effects should be included and given equivalent weighting to physical effects.
 - b. Clearly identify any omissions, uncertainties and dependencies (e.g., air quality assessments being dependant on the accuracy of traffic predictions)
 - c. Evaluate short-term impacts associated with the construction and development phase
 - d. Evaluate long-term impacts associated with the operation of the development
 - e. Evaluate any impacts associated with decommissioning
 - f. Evaluate any potential cumulative impacts as a result of the development, currently approved developments which have yet to be constructed, and proposed developments which do not currently have development consent
6. Monitoring and Audit (not a statutory requirement)
 - a. Identify key modelling predictions and mitigation impacts and consider implementing monitoring and audit to assess their accuracy / effectiveness.

Any assessments undertaken to inform the ES should be proportionate to the potential impacts of the proposal, therefore we accept that, in some circumstances particular assessments may not be relevant to an application, or that an assessment may be adequately completed using a qualitative rather than quantitative methodology. In cases where this decision is made, the applicant should fully explain and justify their rationale in the submitted documentation.

Consideration of alternatives (including alternative sites, choice of process, and the phasing of construction) is widely regarded as good practice. Ideally, the EIA process should start at the stage of site selection, so that the environmental merits of practicable alternatives can be properly considered. Where this is undertaken, the main alternatives considered should be outlined in the ES⁷.

Human and environmental receptors

The applicant should clearly identify the development's location and the location and distance from the development of off-site human receptors that may be affected by emissions from, or activities at, the development. Off-site human receptors may include people living in residential premises; people working in commercial, and industrial premises and people using transport infrastructure (such as roads and railways), recreational areas, and publicly-accessible land.

Identify and consider impacts on residential areas and sensitive receptors (such as schools, nursing homes and healthcare facilities, as well as other vulnerable population groups such as those who are young, older, with disabilities or long-term conditions, or on low incomes) in the area(s) which may be affected by emissions, this should include consideration of any new receptors arising from future development

⁷ DCLG guidance, 1999 <http://www.communities.gov.uk/documents/planningandbuilding/pdf/155958.pdf>

Consideration should also be given to environmental receptors such as the surrounding land, watercourses, surface and groundwater, and drinking water supplies such as wells, boreholes and water abstraction points.

Impacts arising from construction and decommissioning

Any assessment of impacts arising from emissions or activities due to construction and decommissioning should consider potential impacts on all receptors and describe monitoring and mitigation during these phases. Construction and decommissioning will be associated with vehicle movements and cumulative impacts should be accounted for.

We would expect the applicant to follow best practice guidance during all phases from construction to decommissioning to ensure appropriate measures are in place to mitigate any potential negative impact on health from emissions (point source, fugitive and traffic-related) and activities. An effective Construction Environmental Management Plan (CEMP) (and Decommissioning Environmental Management Plan (DEMP)) will help provide reassurance that activities are well managed. The applicant should ensure that there are robust mechanisms in place to respond to any complaints made during construction, operation, and decommissioning of the facility.

Emissions to air and water

Significant impacts are unlikely to arise from industrial installations which employ Best Available Techniques (BAT) and which meet regulatory requirements concerning emission limits and design parameters. However, PHE has a number of comments regarding the assessment of emissions from any type of development in order that the ES provides a comprehensive assessment of potential impacts.

When considering a baseline (of existing environmental quality) and in the assessment and future monitoring of impacts these should:

- include appropriate screening assessments and detailed dispersion modelling where this is screened as necessary
- encompass the combined impacts of all pollutants which may be emitted by the development with all pollutants arising from associated development and transport, considered in a single holistic assessment (ie, of overall impacts)
- include Chemical Abstract Service (CAS) numbers alongside chemical names, where referenced in the ES
- consider the construction, operational, and decommissioning phases
- consider the typical operational emissions and emissions from start-up, shut-down, abnormal operation and accidents when assessing potential impacts and include an assessment of worst-case impacts
- fully account for fugitive emissions
- include appropriate estimates of background levels
 - when assessing the human health risk of a chemical emitted from a facility or operation, background exposure to the chemical from other sources should be taken into account
- identify cumulative and incremental impacts (ie, assess cumulative impacts from multiple sources), including those arising from associated development, other existing and proposed development in the local area, and new vehicle movements associated with the proposed development; associated transport emissions should include consideration of non-road impacts (ie, rail, sea, and air)
- include consideration of local authority, Environment Agency, Natural Resources Wales, Defra national network, and any other local site-specific sources of monitoring data
- compare predicted environmental concentrations to the applicable standard or guideline value for the affected medium. Where available, the most recent UK standards for the appropriate media (ie, air, water, and/or soil) and health-based guideline values should be used when quantifying the risk to human health from chemical pollutants
- where UK standards or guideline values are not available, use those recommended by the European Union or World Health Organization:

- If no standard or guideline value exists, the predicted exposure to humans should be estimated and compared to an appropriate health-based value (eg, a Tolerable Daily Intake or equivalent)
- This should consider all applicable routes of exposure (eg, include consideration of aspects such as the deposition of chemicals emitted to air and their uptake via ingestion)
- when quantitatively assessing the health risk of genotoxic and carcinogenic chemical pollutants, PHE does not favour the use of mathematical models to extrapolate from high dose levels used in animal carcinogenicity studies to well below the observed region of a dose-response relationship. When only animal data are available, we recommend that the ‘Margin of Exposure’ (MOE) approach¹ is used
- identify and consider impacts on residential areas and sensitive receptors (such as schools, nursing homes and healthcare facilities) in the area(s) which may be affected by emissions. This should include consideration of any new receptors arising from future development

Whilst screening of impacts using qualitative methodologies is common practice (eg, for impacts arising from fugitive emissions such as dust), where it is possible to undertake a quantitative assessment of impacts then this should be undertaken.

PHE’s view is that the applicant should appraise and describe the measures that will be used to control both point source and fugitive emissions and demonstrate that standards, guideline values or health-based values will not be exceeded due to emissions from the installation, as described above. This should include consideration of any emitted pollutants for which there are no set emission limits. When assessing the potential impact of a proposed installation on environmental quality, predicted environmental concentrations should be compared to the permitted concentrations in the affected media; this should include both standards for short and long-term exposure. Further to assessments of compliance with limit values, for non-threshold pollutants (ie, those that have no threshold below which health effects do not occur) the **benefits** of development options which reduce population exposure should be evaluated.

Additional points specific to emissions to air

When considering baseline conditions (of existing air quality) and the assessment and future monitoring of impacts, these should include:

- consideration of impacts on existing areas of poor air quality e.g. existing or proposed local authority Air Quality Management Areas (AQMAs)
- modelling using appropriate meteorological data (i.e. come from the nearest suitable meteorological station and include a range of years and worst-case conditions)
- modelling taking into account local topography, congestion and acceleration
- evaluation of the public health **benefits** of development options which reduce air pollution – even below limit values – as pollutants such as nitrogen dioxide and particulate matter show no threshold below which health effects do not occur

Additional points specific to emissions to water

When considering baseline conditions (of existing water quality) and the assessment and future monitoring of impacts, these should:

- include assessment of potential impacts on human health and not focus solely on ecological impacts
- identify and consider all routes by which emissions may lead to population exposure (e.g., surface watercourses, recreational waters, sewers, geological routes etc.)
- assess the potential off-site effects of emissions to groundwater (eg, on aquifers used for drinking water) and surface water (used for drinking water abstraction) in terms of the potential for population exposure
- include consideration of potential impacts on recreational users (eg, from fishing, canoeing etc.) alongside assessment of potential exposure via drinking water

Land quality

We would expect the applicant to provide details of any hazardous contamination present on site (including ground gas) as part of a site condition report.

Emissions to and from the ground should be considered in terms of the previous history of the site and the potential of the site, once operational, to give rise to issues. Public health impacts associated with ground contamination and/or the migration of material off-site should be assessed⁸ and the potential impact on nearby receptors and control and mitigation measures should be outlined.

Relevant areas outlined in the Government's Good Practice Guide for EIA include:

- effects associated with ground contamination that may already exist
- effects associated with the potential for polluting substances that are used (during construction / operation) to cause new ground contamination issues on a site, for example introducing / changing the source of contamination
- impacts associated with re-use of soils and waste soils, for example, re-use of site-sourced materials on-site or offsite, disposal of site-sourced materials offsite, importation of materials to the site, etc.

Waste

The applicant should demonstrate compliance with the waste hierarchy (e.g. with respect to re-use, recycling or recovery and disposal).

For wastes arising from the development the ES should assess:

- the implications and wider environmental and public health impacts of different waste disposal options
- disposal route(s) and transport method(s) and how potential impacts on public health will be mitigated

If the development includes wastes delivered to the installation:

- Consider issues associated with waste delivery and acceptance procedures (including delivery of prohibited wastes) and should assess potential off-site impacts and describe their mitigation

Other aspects

Within the ES, PHE would expect to see information about how the applicant would respond to accidents with potential off-site emissions (e.g., flooding or fires, spills, leaks or releases off-site). Assessment of accidents should: identify all potential hazards in relation to construction, operation and decommissioning; include an assessment of the risks posed; and identify risk management measures and contingency actions that will be employed in the event of an accident in order to mitigate off-site effects.

PHE would expect the applicant to consider the COMAH Regulations (Control of Major Accident Hazards) and the Major Accident Off-Site Emergency Plan (Management of Waste from Extractive Industries) (England and Wales) Regulations: both in terms of their applicability to the development itself, and the development's potential to impact on, or be impacted by, any nearby installations themselves subject to these Regulations.

There is evidence that, in some cases, perception of risk may have a greater impact on health than the hazard itself. A 2009 report⁹, jointly published by Liverpool John Moores University and the Health Protection Agency (HPA), examined health risk perception and environmental problems using a number of case studies. As a point to consider, the report suggested: "*Estimation of community anxiety and stress should be included as part of every risk or impact assessment of*

⁸ Following the approach outlined in the section above dealing with emissions to air and water i.e. comparing predicted environmental concentrations to the applicable standard or guideline value for the affected medium (such as Soil Guideline Values)

⁹ Available from: <http://www.cph.org.uk/wp-content/uploads/2012/08/health-risk-perception-and-environmental-problems--summary-report.pdf>

proposed plans that involve a potential environmental hazard. This is true even when the physical health risks may be negligible." PHE supports the inclusion of this information within ES' as good practice.

Electromagnetic fields (EMF)

This advice relates to electrical installations such as substations and connecting underground cables or overhead lines. PHE advice on the health effects of power frequency electric and magnetic fields is available on the Gov.UK website.¹⁰

There is a potential health impact associated with the electric and magnetic fields around substations, overhead power lines and underground cables. The field strengths tend to reduce with distance from such equipment.

The following information provides a framework for considering the health impact associated with the electric and magnetic fields produced by the proposed development, including the direct and indirect effects of the electric and magnetic fields as indicated above.

Policy Measures for the Electricity Industry

A voluntary code of practice is published which sets out key principles for complying with the ICNIRP guidelines.¹¹

Companion codes of practice dealing with optimum phasing of high voltage power lines and aspects of the guidelines that relate to indirect effects are also available.^{12, 13}

Exposure Guidelines

PHE recommends the adoption in the UK of the EMF exposure guidelines published by the International Commission on Non-ionizing Radiation Protection (ICNIRP). Formal advice to this effect, based on an accompanying comprehensive review of the scientific evidence, was published in 2004 by the National Radiological Protection Board (NRPB), one of PHE's predecessor organisations.¹⁴

Updates to the ICNIRP guidelines for static fields have been issued in 2009 and for low frequency fields in 2010. However, Government policy is that the ICNIRP guidelines are implemented as expressed in the 1999 EU Council Recommendation on limiting exposure of the general public (1999/519/EC):¹⁵

Static magnetic fields

For static magnetic fields, the ICNIRP guidelines published in 2009 recommend that acute exposure of the general public should not exceed 400 mT (millitesla), for any part of the body, although the previously recommended value of 40 mT is the value used in the Council Recommendation. However, because of potential indirect adverse effects, ICNIRP recognises that practical policies need to be implemented to prevent inadvertent harmful exposure of people with implanted electronic medical devices and implants containing ferromagnetic materials, and injuries due to flying ferromagnetic objects, and these considerations can lead to much lower restrictions, such as 0.5 mT.

Power frequency electric and magnetic fields

¹⁰ <https://www.gov.uk/government/collections/electromagnetic-fields#low-frequency-electric-and-magnetic-fields>

¹¹ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/37447/1256-code-practice-emf-public-exp-guidelines.pdf

¹² https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/48309/1255-code-practice-optimum-phasing-power-lines.pdf

¹³ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/224766/powerlines_vcop_microshocks.pdf

¹⁴

<http://webarchive.nationalarchives.gov.uk/20140629102627/http://www.hpa.org.uk/Publications/Radiation/NPRBArchive/DocumentsOfTheNRPB/Absd1502/>

¹⁵ http://webarchive.nationalarchives.gov.uk/+www.dh.gov.uk/en/PublicHealth/Healthprotection/DH_4089500

At 50 Hz, the known direct effects include those of induced currents in the body on the central nervous system (CNS) and indirect effects include the risk of painful spark discharge on contact with metal objects exposed to electric fields. The ICNIRP guidelines published in 1998 give reference levels for public exposure to 50 Hz electric and magnetic fields, and these are respectively 5 kV m⁻¹ (kilovolts per metre) and 100 µT (microtesla). The reference level for magnetic fields changes to 200 µT in the revised (ICNIRP 2010) guidelines because of new basic restrictions based on induced electric fields inside the body, rather than induced current density. If people are not exposed to field strengths above these levels, direct effects on the CNS should be avoided and indirect effects such as the risk of painful spark discharge will be small. The reference levels are not in themselves limits but provide guidance for assessing compliance with underlying basic restrictions and reducing the risk of indirect effects.

Long term effects

There is concern about the possible effects of long-term exposure to electromagnetic fields, including possible carcinogenic effects at levels much lower than those given in the ICNIRP guidelines. In the NRPB advice issued in 2004, it was concluded that the studies that suggest health effects, including those concerning childhood leukaemia, could not be used to derive quantitative guidance on restricting exposure. However, the results of these studies represented uncertainty in the underlying evidence base, and taken together with people's concerns, provided a basis for providing an additional recommendation for Government to consider the need for further precautionary measures, particularly with respect to the exposure of children to power frequency magnetic fields.

The Stakeholder Advisory Group on ELF EMFs (SAGE)

The Stakeholders Advisory Group on ELF EMFs (SAGE) was set up to explore the implications for a precautionary approach to extremely low frequency electric and magnetic fields (ELF EMFs), and to make practical recommendations to Government:¹⁶

Relevant here is SAGE's 2007 First Interim Assessment, which makes several recommendations concerning high voltage power lines. Government supported the implementation of low cost options such as optimal phasing to reduce exposure; however it did not support the option of creating corridors around power lines in which development would be restricted on health grounds, which was considered to be a disproportionate measure given the evidence base on the potential long term health risks arising from exposure. The Government response to SAGE's First Interim Assessment is available on the national archive website.¹⁷

The Government also supported calls for providing more information on power frequency electric and magnetic fields, which is available on the PHE web pages.

Ionising radiation

Particular considerations apply when an application involves the possibility of exposure to ionising radiation. In such cases it is important that the basic principles of radiation protection recommended by the International Commission on Radiological Protection¹⁸ (ICRP) are followed. PHE provides advice on the application of these recommendations in the UK. The ICRP recommendations are implemented in the Euratom Basic Safety Standards¹⁹ (BSS) and these form the basis for UK legislation, including the Ionising Radiation Regulations 1999, the Radioactive Substances Act 1993, and the Environmental Permitting Regulations 2016.

¹⁶ <http://www.emfs.info/policy/sage/>

¹⁷

http://webarchive.nationalarchives.gov.uk/20130107105354/http://www.dh.gov.uk/en/Publicationsandstatistics/Publications/PublicationsPolicyAndGuidance/DH_107124

¹⁸ These recommendations are given in publications of the ICRP notably publications 90 and 103 see the website at <http://www.icrp.org/>

¹⁹ Council Directive 96/29/EURATOM laying down basic safety standards for the protection of the health of workers and the general public against the dangers arising from ionising radiation.

As part of the EIA process PHE expects applicants to carry out the necessary radiological impact assessments to demonstrate compliance with UK legislation and the principles of radiation protection. This should be set out clearly in a separate section or report and should not require any further analysis by PHE. In particular, the important principles of justification, optimisation and radiation dose limitation should be addressed. In addition compliance with the Euratom BSS and UK legislation should be clear.

When considering the radiological impact of routine discharges of radionuclides to the environment PHE would, as part of the EIA process, expect to see a full radiation dose assessment considering both individual and collective (population) doses for the public and, where necessary, workers. For individual doses, consideration should be given to those members of the public who are likely to receive the highest exposures (referred to as the representative person, which is equivalent to the previous term, critical group).

Different age groups should be considered as appropriate and should normally include adults, 1 year old and 10 year old children. In particular situations doses to the fetus should also be calculated²⁰.

The estimated doses to the representative person should be compared to the appropriate radiation dose criteria (dose constraints and dose limits), taking account of other releases of radionuclides from nearby locations as appropriate. Collective doses should also be considered for the UK, European and world populations where appropriate.

The methods for assessing individual and collective radiation doses should follow the guidance given in 'Principles for the Assessment of Prospective Public Doses arising from Authorised Discharges of Radioactive Waste to the Environment August 2012'²¹

It is important that the methods used in any radiological dose assessment are clear and that key parameter values and assumptions are given (for example, the location of the representative persons, habit data and models used in the assessment).

Any radiological impact assessment, undertaken as part of the EIA, should also consider the possibility of short-term planned releases and the potential for accidental releases of radionuclides to the environment. This can be done by referring to compliance with the Ionising Radiation Regulations and other relevant legislation and guidance.

The radiological impact of any solid waste storage and disposal should also be addressed in the assessment to ensure that this complies with UK practice and legislation; information should be provided on the category of waste involved (e.g. very low level waste, VLLW). It is also important that the radiological impact associated with the decommissioning of the site is addressed.

Of relevance here is PHE advice on radiological criteria and assessments for land-based solid waste disposal facilities²². PHE advises that assessments of radiological impact during the operational phase should be performed in the same way as for any site authorised to discharge radioactive waste. PHE also advises that assessments of radiological impact during the post operational phase of the facility should consider long timescales (possibly in excess of 10,000 years) that are appropriate to the long-lived nature of the radionuclides in the waste, some of which may have half-lives of millions of years.

²⁰ HPA (2008) Guidance on the application of dose coefficients for the embryo, fetus and breastfed infant in dose assessments for members of the public. Doc HPA, RCE-5, 1-78, available at

<https://www.gov.uk/government/publications/embryo-fetus-and-breastfed-infant-application-of-dose-coefficients>

²¹ The Environment Agency (EA), Scottish Environment Protection Agency (SEPA), Northern Ireland Environment Agency, Health Protection Agency and the Food Standards Agency (FSA).

Principles for the Assessment of Prospective Public Doses arising from Authorised Discharges of Radioactive Waste to the Environment August 2012.

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/296390/geho1202bklh-e-e.pdf

²² HPA RCE-8, Radiological Protection Objectives for the Land-based Disposal of Solid Radioactive Wastes, February 2009

The radiological assessment should consider exposure of members of hypothetical representative groups for a number of scenarios including the expected migration of radionuclides from the facility, and inadvertent intrusion into the facility once institutional control has ceased.

For scenarios where the probability of occurrence can be estimated, both doses and health risks should be presented, where the health risk is the product of the probability that the scenario occurs, the dose if the scenario occurs and the health risk corresponding to unit dose.

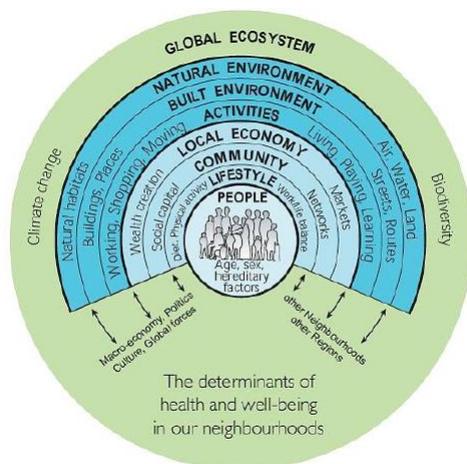
For inadvertent intrusion, the dose if the intrusion occurs should be presented. It is recommended that the post-closure phase be considered as a series of timescales, with the approach changing from more quantitative to more qualitative as times further in the future are considered.

The level of detail and sophistication in the modelling should also reflect the level of hazard presented by the waste. The uncertainty due to the long timescales means that the concept of collective dose has very limited use, although estimates of collective dose from the 'expected' migration scenario can be used to compare the relatively early impacts from some disposal options if required.

Wider Determinants of Health

World Health Organization (WHO's) defines health as "a state of complete physical, mental and social well-being and not merely an absence of disease or infirmity" (WHO, 1948).

The health of an individual or a population is the result of a complex interaction of a wide range of different determinants of health, from an individual's genetic make-up, to lifestyles and behaviours, and the communities, local economy, built and natural environments to global ecosystem trends. All developments will have some effect on the determinants of health, which in turn will influence the health and wellbeing of the general population, vulnerable groups and individual people.



Barton and Grant²³

PHE recognises that evaluating an NSIP's impacts on health through the wider determinants is more complex than assessing a project's direct impacts against clearly defined regulatory protections (e.g. protected species). However, this does not mean that their assessment should be side-lined; with the 2017 EIA Regulations clarifying that the likely significant effects of a development proposal on human health must be assessed.

We accept that the relevance of these topics and associated impacts will vary depending on the nature of the proposed development and in order to assist applicants PHE has focused its approach on scoping determinants of health and wellbeing under four themes, which have been derived from

²³ Barton H, Grant M. A health map for the local human habitat. The Journal of the Royal Society for the Promotion of Health 2006; 126(6): 252-3.

an analysis of the wider determinants of health mentioned in the National Policy Statements. PHE has developed a list of 21 determinants of health and wellbeing under four broad themes, which have been derived from an analysis of the wider determinants of health mentioned in the National Policy Statements (NPS). If the applicant proposes to scope any areas out of the assessment, they should provide clear reasoning and justification.

The four themes are:

- Access
- Traffic and Transport
- Socioeconomic
- Land Use

Methodology

PHE will expect assessments to set out the methodology used to assess each determinant included in the scope of the assessment. In some instances, the methodologies described may be established and refer to existing standards and/or guidance. In other instances, there may be no pre-defined methodology, which can often be the case for the wider determinants of health; as such there should be an application of a logical impact assessment method that:

- identifies effected populations vulnerable to impacts from the relevant determinant
- establishes the current baseline situation
- identifies the NSIP's potential direct and indirect impacts on each population
- if impacts are identified, evaluates whether the potential impact is significant in relation to the affected population
- identifies appropriate mitigation to minimise impacts or the subsequent effects on health
- identifies opportunities to achieve benefits from the scheme
- identifies appropriate monitoring programmes

Currently there is no standard methodology for assessing the population and human health effects of infrastructure projects, but a number of guides exist, including:

- Institute of Environmental Management and Assessment, 2017: Health in Environmental Assessment, a primer for a proportionate approach;
- NHS London Healthy Urban Development Unit (HUDU), 2015. Healthy Urban Planning Checklist and Rapid Health Impact Assessment Tool;
- Wales Health Impact Assessment Unit, 2012: HIA a practical guide;
- National Mental Wellbeing Impact Assessment Development Unit 2011: Mental Wellbeing Impact Assessment Toolkit;

Determining significant effects

Neither the EIA regulations nor the National Policy Statements provide a definition of what constitutes a 'significant' effect, and so PHE have derived a list of factors which it will take into consideration in the assessment of significance of effects, as outlined below. These list of factors should be read in conjunction with guidance from the above guides.

1. Sensitivity:

Is the population exposed to the NSIP at particular risk from effects on this determinant due to pre-existing vulnerabilities or inequalities (for example, are there high numbers in the local population of people who are young, older, with disabilities or long-term conditions, or on a low income)? Will the NSIP widen existing inequalities or introduce new inequalities in relation to this determinant?

2. Magnitude:

How likely is the impact on this determinant to occur? If likely, will the impact affect a large number of people / Will the impact affect a large geographic extent? Will the effects be frequent or continuous? Will the effects be temporary or permanent and irreversible?

3. Cumulative effects:

Will the NSIP's impacts on this determinant combine with effects from other existing or proposed NSIPs or large-scale developments in the area, resulting in an overall cumulative effect different to that of the project alone?

What are the cumulative effects of the impacts of the scheme on communities or populations. Individual impacts individually may not be significant but in combination may produce an overall significant effect.

4. Importance:

Is there evidence for the NSIP's effect on this determinant on health? Is the impact on this determinant important in the context of national, regional or local policy?

5. Acceptability:

What is the local community's level of acceptance of the NSIP in relation to this determinant? Do the local community have confidence that the applicants will promote positive health impacts and mitigate against negative health effects?

6. Opportunity for mitigation:

If this determinant is included in the scope for the EIA is there an opportunity to enhance any positive health impacts and/or mitigate any negative health impacts?

Scoping

The scoping report may determine that some of the wider determinants considered under human and population health can be scoped out of the EIA. If that, should be the case, detailed rationale and supporting evidence for any such exclusions must be provided. PHE will expect an assessment to have considered all of the determinants listed in Table1 of Appendix 1 as a minimum.

Vulnerable groups

Certain parts of the population may experience disproportionate negative health effects as a result of a development. Vulnerable populations can be identified through research literature, local population health data or from the identification of pre-existing health conditions that increase vulnerability.

The on health and wellbeing and health inequalities of the scheme will have particular effect on vulnerable or disadvantaged populations, including those that fall within the list of protected characteristics. Some protected groups are more likely to have elevated vulnerability associated with social and economic disadvantages. Consideration should be given to language or lifestyles that influence how certain populations are affected by impacts of the proposal, for example non-English speakers may face barriers to accessing information about the works or expressing their concerns.

Equality Impact Assessments (EqIA) are used to identify disproportionate effects on Protected Groups (defined by the Equality Act, 2010), including health effects. The assessments and findings of the Environmental Statement and the EqIA should be cross reference between the two documents, particularly to ensure the assessment of potential impacts for health and inequalities and that resulting mitigation measures are mutually supportive.

The Wales Health Impact Assessment Support Unit (WHIASU), provides a suggested list of vulnerable groups

Age related groups

- Children and young people
- Older people

Income related groups

- People on low income
- Economically inactive
- Unemployed/workless

- People who are unable to work due to ill health

Groups who suffer discrimination or other social disadvantage

- People with physical or learning disabilities/difficulties
- Refugee groups
- People seeking asylum
- Travellers
- Single parent families
- Lesbian and gay and transgender people
- Black and minority ethnic groups
- Religious groups

Geographical groups

- People living in areas known to exhibit poor economic and/or health indicators
- People living in isolated/over-populated areas
- People unable to access services and facilities

Mental health

PHE supports the use of the broad definition of health proposed by the World Health Organisation (WHO). Mental well-being is fundamental to achieving a healthy, resilient and thriving population. It underpins healthy lifestyles, physical health, educational attainment, employment and productivity, relationships, community safety and cohesion and quality of life. NSIP schemes can be of such scale and nature that will impact on the over-arching protective factors, which are:

- Enhancing control
- Increasing resilience and community assets
- Facilitating participation and promoting inclusion.

There should be parity between mental and physical health, and any assessment of health impact should include the appreciation of both. A systematic approach to the assessment of the impacts on mental health, including suicide, is required. The **Mental Well-being Impact Assessment (MWIA)** could be used as a methodology. The assessment should identify vulnerable populations and provide clear mitigation strategies that are adequately linked to any local services or assets

Perceptions about the proposed scheme may increase the risk of anxiety or health effects by perceived effects. “Estimation of community anxiety and stress should be included as part of every risk or impact assessment of proposed plans that involve a potential environmental hazard.

Evidence base and baseline data

An assessment should be evidence based, using published literature to identify determinants and likely health effects. The strength of evidence identifying health effects can vary, but where the evidence for an association is weak it should not automatically be discounted.

There will be a range of publicly available health data including:

- National datasets such as those from the Office of National Statistics,
- Public Health England (PHE), including the fingertips data sets,
- Non-governmental organisations,
- Local public health reports, such as the Joint Strategic Needs Assessment, Health and Wellbeing Strategies;
- Consultation with local authorities, including local authority public health teams;
- Information received through public consultations

Mitigation

If the assessment has identified that significant negative effects are likely to occur with respect to the wider determinants of health, the assessment should include a description of planned mitigation measures the applicant will implement to avoid or prevent effects on the population.

Mitigation and/or monitoring proposals should be logical, feasible and have a clear governance and accountability framework indicating who will be responsible for implementation and how this will be secured during the construction and/or operation of the NSIP.

Positive benefits from the scheme

The scale of many NSIP developments will generate the potential for positive impacts on health and wellbeing; however, delivering such positive health outcomes often requires specific enabling or enhancement measures. For example, the construction of a new road network to access an NSIP site may provide an opportunity to improve the active transport infrastructure for the local community. PHE expects developments to consider and report on the opportunity and feasibility of positive impacts. These may be stand alone or be considered as part of the mitigation measures.

Monitoring

PHE expects an assessment to include consideration of the need for monitoring. It may be appropriate to undertake monitoring where:

- Critical assumptions have been made
- There is uncertainty about whether negative impacts are likely to occur as it may be appropriate to include planned monitoring measures to track whether impacts do occur.
- There is uncertainty about the potential success of mitigation measures
- It is necessary to track the nature of the impact and provide useful and timely feedback that would allow action to be taken should negative impacts occur

How to contact PHE

If you wish to contact us regarding an existing or potential NSIP application please email: nsipconsultations@phe.gov.uk

Appendix 1

Table 1 – Wider determinants of health and wellbeing

Health and wellbeing themes			
Access	Traffic and Transport	Socioeconomic	Land Use
Wider determinants of health and wellbeing			
Access to : <ul style="list-style-type: none"> • local public and key services and facilities. • Good quality affordable housing. • Healthy affordable food. • The natural environment. • The natural environment within the urban environment. • Leisure, recreation and physical activities within the urban and natural environments. 	<ul style="list-style-type: none"> • Accessibility. • Access to/by public transport. • Opportunities for access by cycling and walking. • Links between communities. • Community severance. • Connections to jobs. • Connections to services, facilities and leisure opportunities. 	<ul style="list-style-type: none"> • Employment opportunities, including training opportunities. • Local business activity. • Regeneration. • Tourism and leisure industries. • Community/social cohesions and access to social networks. • Community engagement. 	<ul style="list-style-type: none"> • Land use in urban and/or /rural settings. • Quality of Urban and natural environments

1) **Access**

a. Access to local, public and key services and facilities

Access to local facilities can increase mobility and social participation. Body mass index is significantly associated with access to facilities, including factors such as the mix and density of facilities in the area. The distance to facilities has no or only a small effect on walking and other physical activities. Access to recreational facilities can increase physical activity, especially walking for recreation, reduce body weight, reduce the risk of high blood pressure, and reduce the number of vehicle trips, the distances travelled and greenhouse gas emissions.

Local services include health and social care, education, employment, and leisure and recreation. Local facilities include community centres, shops, banks/credit unions and Post Offices. Services and facilities can be operated by the public, private and/or voluntary sectors. Access to services and facilities is important to both physical and mental health and wellbeing. Access is affected by factors such as availability,

proximity to people's place of residence, existence of transport services or active travel infrastructure to the location of services and facilities, and the quality of services and facilities.

The construction or operation of an NSIP can affect access adversely: it may increase demand and therefore reduce availability for the existing community; during construction, physical accessibility may be reduced due to increased traffic and/or the blockage of or changes to certain travel routes. It is also possible that some local services and facilities are lost due to the land-take needed for the NSIP.

Conversely if new routes are built or new services or facilities provided the NSIP may increase access. NSIPs relating to utilities such as energy and water can maintain, secure or increase access to those utilities, and thereby support health and wellbeing.

b. Access to good-quality affordable housing

Housing refurbishment can lead to an improvement in general health and reduce health inequalities. Housing improvements may also benefit mental health. The provision of diverse forms and types of housing is associated with increased physical activity. The provision of affordable housing is strongly associated with improved safety perceptions in the neighbourhood, particularly among people from low-income groups. For vulnerable groups, the provision of affordable housing can lead to improvements in social, behavioural and health related outcomes. For some people with long term conditions, the provision of secure and affordable housing can increase engagement with healthcare services, which can lead to improved health-related outcomes. The provision of secure and affordable housing can also reduce engagement in risky health-related behaviours. For people who are homeless, the provision of affordable housing increases engagement with healthcare services, improves quality of life and increases employment, and contributes to improving mental health.

Access to housing meets a basic human need, although housing of itself is not necessarily sufficient to support health and wellbeing: it is also important that the housing is of good quality and affordable. Factors affecting the quality of housing include energy efficiency (eg effective heating, insulation), sanitation and hygiene (eg toilet and bathroom), indoor air quality including ventilation and the presence of damp and/or mould, resilience to climate change, and overcrowding. The affordability of housing is important because for many people, especially people on a low income, housing will be the largest monthly expense; if the cost of housing is high, people may not be able to meet other needs such as the need for heating in winter or food. Some proposals for NSIPs include the provision of housing, which could be beneficial for the health and wellbeing of the local population. It is also possible that some housing will be subject to a compulsory purchase order due to the land-take needed for an NSIP.

c. Access to affordable healthy food

Access to healthy food is related to the provision of public and active transport infrastructure and the location and proximity of outlets selling healthier food such as fruit and vegetables. For the general population, increased access to healthy, affordable food through a variety of outlets (shops, supermarkets, farmers' markets and community gardens) is associated with improved dietary behaviours, including attitudes towards healthy eating and food purchasing behaviour, and improved adult weight. Increased access to unhealthier food retail outlets is associated with increased weight in the general population and increased obesity and unhealthy eating behaviours among children living in low-income areas. Urban agriculture can improve attitudes towards healthier food and increase fruit and vegetable consumption.

Factors affecting access to healthy affordable food include whether it is readily available from local shops, supermarkets, markets or delivery schemes and/or there are opportunities to grow food in local allotments or community gardens. People in environments where there is a high proportion of fast food outlets may not have easy access to healthy affordable food.

d. Access to the natural environment

Availability of and access to safe open green space is associated with increased physical activity across a variety of behaviours, social connectedness, childhood development, reduced risk of overweight and obesity and improved physical and mental health outcomes. While the quantity of green space in a neighbourhood helps to promote physical activity and is beneficial to physical health, eg lower rates of mortality from cardiovascular disease and respiratory disease in men, the availability of green environments is likely to contribute more to mental health than to physical health: the prevalence of some disease clusters, particularly anxiety and depression, is lower in living environments which have more green space within a 1-km radius.

The proximity, size, type, quality, distribution, density and context of green space are also important factors. Quality of green space may be a better predictor of health than quantity, and any type of green space in a neighbourhood does not necessarily act as a venue for, or will encourage, physical activity. 'Walkable' green environments are important for better health, and streetscape greenery is as strongly related to self-reported health as green areas. Residents in deprived areas are more likely to perceive access to green space as difficult, to report poorer safety, to visit the green space less frequently and to have lower levels of physical activity. The benefits to health and wellbeing of blue space include lower psychological distress.

The natural environment includes the landscape, waterscape and seascape. Factors affecting access include the proximity of the natural environment to people's place of residence, the existence of public transport services or active travel infrastructure to the natural environment, the quality of the natural environment and feelings of safety in the natural environment. The construction of an NSIP may be an opportunity to provide green and/or blue infrastructure in the local area. It is also possible that green or blue infrastructure will be lost due to the land-take needed for the NSIP.

e. Access to the natural environment within the urban environment

Public open spaces are key elements of the built environment. Ecosystem services through the provision of green infrastructure are as important as other types of urban infrastructure, supporting physical, psychological and social health, although the quality and accessibility of green space affects its use, C19, ethnicity and perceptions of safety. Safe parks may be particularly important for promoting physical activity among urban adolescents. Proximity to urban green space and an increased proportion of green space are associated with decreased treatment of anxiety/mood disorders, the benefits deriving from both participation in usable green space near to home and observable green space in the neighbourhood. Urban agriculture may increase opportunities for physical activity and social connections.

A view of 'greenery' or of the sea moderates the annoyance response to noise. Water is associated with positive perceptive experiences in urban environments, with benefits for health such as enhanced contemplation, emotional bonding, participation and physical activity. Increasing biodiversity in urban environments, however, may promote the introduction of vector or host organisms for infectious pathogens, eg green connectivity may potentiate the role of rats and ticks in the spread of disease, and bodies of water may provide habitats for mosquitoes. Owing to economic growth,

population size and urban and industrial expansion in the EU, to maintain ecosystem services at 2010 levels, for every additional percentage increase in the proportion of 'artificial' land, there needs to be a 2.2% increase in green infrastructure.

The natural environment within the urban environment includes the provision of green space and blue space in towns and cities. Factors involved in access include the proximity of the green and/or blue space to people's place of residence, the existence of transport services or active travel infrastructure to the green and/or blue space, the quality of the green and/or blue space and feelings of safety when using the green and/or blue space. The construction of an NSIP may be an opportunity to provide green and/or blue infrastructure in the local urban environment. It is also possible that green or blue infrastructure in the urban environment will be lost due to the land-take needed for the NSIP.

- f. Access to leisure, recreation and physical activity opportunities within the urban and natural environments.

Access to recreational opportunities, facilities and services is associated with risk factors for long-term disease; it can increase physical activity, especially walking for recreation, reduce body mass index and overweight and obesity, reduce the risk of high blood pressure, and reduce the number of vehicle trips, the distances travelled and greenhouse gas emissions. It can also enhance social connectedness. Children tend to play on light-traffic streets, whereas outdoor activities are less common on high-traffic streets. A perception of air pollution can be a barrier to participating in outdoor physical activity. There is a positive association between urban agriculture and increased opportunities for physical activity and social connectivity. Gardening in an allotment setting can result in many positive physical and mental health-related outcomes. Exercising in the natural environment can have a positive effect on mental wellbeing when compared with exercising indoors.

Leisure and recreation opportunities include opportunities that are both formal, such as belonging to a sports club, and informal, such as walking in the local park or wood. Physical activity opportunities include routine activity as part of daily life, such as walking or cycling to work, and activity as part of leisure or recreation, such as playing football. The construction of an NSIP may enhance the opportunities available for leisure and recreation and physical activity through the provision of new or improved travel routes, community infrastructure and/or green or blue space. Conversely, construction may reduce access through the disruption of travel routes to leisure, recreation and physical activity opportunities.

2) **Traffic and Transport**

- a. Accessibility

Walkability, regional accessibility, pavements and bike facilities are positively associated with physical activity and negatively related to body weight and high blood pressure, and reduce the number of vehicle trips, the distances travelled and greenhouse gas emissions. Body mass index is associated with street network accessibility and slope variability.

Accessibility in relation to transport and travel has several aspects including whether potential users can gain physical access to the infrastructure and access to the services the infrastructure provides. The design and operation of transport infrastructure and the associated services should take account of the travel needs of all potential users including people with limited mobility. People whose specific needs should be considered include pregnant women, older people, children and young people and people with a disability. Other aspects of transport infrastructure affecting

accessibility include safety and affordability, both of which will affect people's ability to travel to places of employment and/or key local services and facilities and/or access their social networks.

b. Access to / by public transport

Provision of high-quality public transport is associated with higher levels of active travel among children and among people commuting to work, with a decrease in the use of private cars. Combining public transport with other forms of active travel can improve cardiovascular fitness. Innovative or new public transport interventions may need to be marketed and promoted differently to different groups of transport users, eg by emphasising novelty to car users while ensuring that the new system is seen by existing users as coherently integrated with existing services.

Transport facilitates access to other services, facilities and amenities important to health and wellbeing. Public transport is any transport open to members of the public including bus, rail and taxi services operated by the public, private or community sectors. For people who do not have access to private transport, access to public transport is important as the main agency of travel especially for journeys >1 mile. Access to public transport is not sufficient, however, and access by public transport needs to be taken into account: public transport services should link places where people live with the destinations they need or want to visit such as places of employment, education and healthcare, shops, banks and leisure facilities. Other aspects of access to public transport include affordability, safety, frequency and reliability of services.

c. Opportunities for / access by cycling & walking

Walking and cycling infrastructure can enhance street connectivity, helping to reduce perceptions of long-distance trips and providing alternative routes for active travel. Prioritising pedestrians and cyclists through changes in physical infrastructure can have positive behavioural and health outcomes, such as physical activity, mobility and cardiovascular outcomes. The provision and proximity of active transport infrastructure is also related to other long-term disease risk factors, such as access to healthy food, social connectedness and air quality. The perception of air pollution, however, appears to be a barrier to participating in active travel.

Perceived or objective danger may also have an adverse effect on cycling and walking, both of which activities decrease with increasing traffic volume and speed, and cycling for leisure decreases as local traffic density increases. Health gains from active travel policies outweigh the adverse effects of road traffic incidents. New infrastructure to promote cycling, walking and the use of public transport can increase the time spent cycling on the commute to work, and the overall time spent commuting among the least-active people. Active travel to work or school can be associated with body mass index and weight, and may reduce cardiovascular risk factors and improve cardiovascular outcomes. The distance of services from cycle paths can have an adverse effect on cycling behaviour, whereas mixed land use, higher densities and reduced distances to non-residential destinations promote transportation walking.

d. Links between communities

Social connectedness can be enhanced by the provision of public and active transport infrastructure and the location of employment, amenities, facilities and services.

e. Community severance

In neighbourhoods with high volumes of traffic, the likelihood of people knowing and

trusting neighbours is reduced.

f. Connections to jobs

The location of employment opportunities and the provision of public and active transportation infrastructure are associated with risk factors for long-term disease such as physical activity. Good pedestrian and cycling infrastructure can promote commuting physical activity. Improved transport infrastructure has the potential to shift the population distribution of physical activity in relation to commuting, although a prerequisite may be a supportive social environment. Mixed land use, higher densities and reduced distances to non-residential destinations promote transportation walking.

The ease of access to employment, shops and services including the provision of public and active transport are important considerations and schemes should take any opportunity to improve infrastructure to promote cycling, walking and the use of public transport

g. Connections to services, facilities and leisure opportunities

Mixed land use, higher densities and reduced distances to non-residential destinations promote transportation walking. Access to recreational opportunities and the location of shops and services are associated with risk factors for long-term disease such as physical activity, access to healthy food and social connectedness. Increased distance of services from cycle paths can have an adverse effect on cycling behaviour.

3) **Socio Economic**

a. Employment opportunities including training opportunities

Employment is generally good for physical and mental health and well-being, and worklessness is associated with poorer physical and mental health and well-being. Work can be therapeutic and can reverse the adverse health effects of unemployment for healthy people of working age, many disabled people, most people with common health problems and social security beneficiaries. Account must be taken of the nature and quality of work and its social context and jobs should be safe and accommodating. Overall, the beneficial effects of work outweigh the risks of work and are greater than the harmful effects of long-term unemployment or prolonged sickness absence. Employment has a protective effect on depression and general mental health.

Transitions from unemployment to paid employment can reduce the risk of distress and improve mental health, whereas transitions into unemployment are psychologically distressing and detrimental to mental health. The mental health benefits of becoming employed are also dependent on the psychosocial quality of the job, including level of control, demands, complexity, job insecurity and level of pay: transition from unemployment to a high-quality job is good for mental health, whereas transition from unemployment to a low-quality job is worse for mental health than being unemployed. For people receiving social benefits, entry into paid employment can improve quality of life and self-rated health (physical, mental, social) within a short time-frame. For people receiving disability benefits, transition into employment can improve mental and physical health. For people with mental health needs, entry into employment reduces the use of mental health services.

For vocational rehabilitation of people with severe mental illness (SMI), Supported Employment is more effective than Pre-vocational Training in helping clients obtain competitive employment; moreover, clients in Supported Employment earn more and

work more hours per month than those in Pre-vocational Training.

b. Local Business Activity

It is important to demonstrate how a proposed development will contribute to ensuring the vitality of town centres. Schemes should consider the impact on local employment, promote beneficial competition within and between town centres, and create attractive, diverse places where people want to live, visit and work

In rural areas the applicant should assess the impact of the proposals on a prosperous rural economy, demonstrate how they will support the sustainable growth and expansion of all types of business and enterprise in rural areas, promoting the development and diversification of agricultural and other land based rural businesses.

c. Regeneration

Following rebuilding and housing improvements in deprived neighbourhoods, better housing conditions are associated with better health behaviours; allowing people to remain in their neighbourhood during demolition and rebuilding is more likely to stimulate life-changing improvements in health behaviour than in people who are relocated. The partial demolition of neighbourhoods does not appear to affect residents' physical or mental health. Mega-events, such as the Olympic Games, often promoted on the basis of their potential legacy for regeneration, appear to have only a short-term impact on mental health.

d. Tourism and Leisure Industries

The applicant should assess the impact of the proposed development on retail, leisure, commercial, office, tourism, cultural, community and residential development needed in town centres. In rural locations assessment and evaluation of potential impacts on sustainable rural tourism and leisure developments that benefit businesses in rural areas, communities and visitors should be undertaken.

e. Community / social cohesion and access to social networks

The location of employment, shops and services, provision of public and active transport infrastructure and access to open space and recreational opportunities are associated with social connectedness. Access to local amenities can increase social participation. Neighbourhoods that are more walkable can increase social capital. Urban agriculture can increase opportunities for social connectivity. Infrastructure developments, however, can affect the quality of life of communities living in the vicinity, mediated by substantial community change, including feelings of threat and anxiety, which can lead to psychosocial stress and intra-community conflict.

f. Community engagement

Public participation can improve environmental impact assessments, thereby increasing the total welfare of different interest groups in the community. Infrastructure development may be more acceptable to communities if it involves substantial public participation.

4) **Land Use**

a. Land use in urban and / or rural settings

Land-use mix including infrastructure:

Land use affects health not only by shaping the built environment, but also through

the balance of various types of infrastructure including transport. Vulnerable groups in the population are disproportionately affected by decisions about land use, transport and the built environment. Land use and transport policies can result in negative health impacts due to low physical activity levels, sedentary behaviours, road traffic incidents, social isolation, air pollution, noise and heat. Mixed land use can increase both active travel and physical activity. Transportation walking is related to land-use mix, density and distance to non-residential destinations; recreational walking is related to density and mixed use. Using modelling, if land-use density and diversity are increased, there is a shift from motorised transport to cycling, walking and the use of public transport with consequent health gain from a reduction in long-term conditions including diabetes, cardiovascular disease and respiratory disease.

Proximity to infrastructure:

Energy resource activities relating to oil, gas and coal production and nuclear power can have a range of negative effects on children and young people. Residing in proximity to motorway infrastructure can reduce physical activity. For residents in proximity to rail infrastructure, annoyance is mediated by concern about damage to their property and future levels of vibration. Rural communities have concerns about competing with unconventional gas mining for land and water for both the local population and their livestock."

b. Quality of urban and natural environments

Long-term conditions such as cardiovascular disease, diabetes, obesity, asthma and depression can be moderated by the built environment. People in neighbourhoods characterised by high 'walkability' walk more than people in neighbourhoods with low 'walkability' irrespective of the land-use mix. In neighbourhoods associated with high 'walkability' there is an increase in physical activity and social capital, a reduction in overweight and blood pressure, and fewer reports of depression and of alcohol abuse. The presence of walkable land uses, rather than their equal mixture, relates to a healthy weight. Transportation walking is at its highest levels in neighbourhoods where the land-use mix includes residential, retail, office, health, welfare and community, and entertainment, culture and recreation land uses; recreational walking is at its highest levels when the land-use mix includes public open space, sporting infrastructure and primary and rural land uses. Reduced levels of pollution and street connectivity increase participation in physical activity.

Good-quality street lighting and traffic calming can increase pedestrian activity, while traffic calming reduces the risk of pedestrian injury. 20-mph zones and limits are effective at reducing the incidence of road traffic incidents and injuries, while good-quality street lighting may prevent them. Public open spaces within neighbourhoods encourage physical activity, although the physical activity is dependent on different aspects of open space, such as proximity, size and quality. Improving the quality of urban green spaces and parks can increase visitation and physical activity levels.

Living in a neighbourhood overlooking public areas can improve mental health, and residential greenness can reduce the risk of cardiovascular mortality. Crime and safety issues in a neighbourhood affect both health status and mental health. Despite the complexity of the relationship, the presence of green space has a positive effect on crime, and general environmental improvements may reduce the fear of crime. Trees can have a cooling effect on the environment – an urban park is cooler than a non-green site. Linking road infrastructure planning and green infrastructure planning can produce improved outcomes for both, including meeting local communities' landscape sustainability objectives.

Appendix 2

Noise and Public Health

Public Health England's mission is to protect and improve the nation's health and wellbeing and reduce health inequalities. Environmental noise can cause stress and disturb sleep, which over the long term can lead to a number of adverse health outcomes [1, 2].

The Noise Policy Statement for England (NPSE) [3] sets out the government's overall policy on noise. Its aims are to:

- avoid significant adverse impacts on health and quality of life;
- mitigate and minimise adverse impacts on health and quality of life; and
- contribute to the improvement of health and quality of life.

These aims should be applied within a broader context of sustainable development, where noise is considered alongside other economic, social and environmental factors. PHE expects such factors may include [4]:

- Ensuring healthy lives and promoting well-being for all at all ages;
- promoting sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all;
- building resilient infrastructure, promoting inclusive and sustainable industrialisation and fostering innovation;
- reducing inequality; and
- making cities and human settlements inclusive, safe, resilient and sustainable.

PHE's consideration of the effects of health and quality and life attributable to noise is guided by the recommendations in the 2018 Environmental Noise Guidelines for the European Region [1] published by the World Health Organization, and informed by high quality systematic reviews of the scientific evidence [2, 5, 6]. The scientific evidence on noise and health is rapidly developing, and PHE's recommendations are also informed by relevant studies that are judged to be scientifically robust and consistent with the overall body of evidence.

In line with its mission, PHE believes that Nationally Significant Infrastructure Projects (NSIP) should not only limit significant adverse effects, but also explore opportunities to improve the health and quality of life of local communities and reduce inequalities.

PHE also recognises the developing body of evidence showing that areas of tranquillity offer opportunities for health benefits through psychological restoration. NSIP applications need to demonstrate that they have given due consideration to the protection of the existing sound environment in these areas.

Significance of Impacts

Determining significance of impacts is an essential element of an Environmental Impact Assessment, and therefore significance needs to be clearly defined at the earliest opportunity by the Applicant. PHE recommends that the definition of significance is discussed and agreed with relevant stakeholders, including local authority environmental health and public health teams and local community representatives, through a documented consultation process. PHE recommends that any disagreement amongst stakeholders on the methodology for defining significance is acknowledged in the planning application documentation and could inform additional sensitivity analyses.

For noise exposure, PHE expects assessments of significance to be closely linked to the associated impacts on health and quality of life, and not on noise exposure per se (in line with the NPSE). The latest revision of the Design Manual for Roads and Bridges (DMRB) Table 3.49 LA111 [7] includes proposed values for the Lowest Observable Adverse Effect Level (LOAEL) and Significant

Observable Adverse Effect Level (SOAEL)²⁴ for operational noise, and these values are likely to inform judgements on significance of impact. Whilst DMRB does not explicitly reference the underpinning evidence that informed these numbers, the night time LOAEL and SOAEL of 40 dB L_{night} (outside, free-field) and 55 dB L_{night} (outside, free-field) respectively, correspond to the guideline value and interim target proposed in the WHO Night Noise Guidelines (2009) [8]. The Night Noise Guidelines emphasized that the interim target was “not a health-based limit value by itself. Vulnerable groups cannot be protected at this level”.

The daytime SOAEL of 68 dB $L_{A10,18\text{hr}}$ (façade) appears to be derived from the relative noise level in the Noise Insulation Regulations (NIR) [9], which is linked to the provision of enhanced noise insulation for new highway infrastructure. The NIR does not explicitly refer to the underpinning evidence on which the relevant noise level is based, and there is a lack of good quality evidence linking noise exposure expressed in the L_{A10} metric to health effects. Therefore, it is helpful to convert these levels to L_{den} and $L_{\text{Aeq},16\text{hr}}$ metrics, which are more widely used in the noise and health literature. Assuming motorway traffic, a level of 68 dB $L_{A10,18\text{hr}}$ (façade) is approximately equivalent to²⁵ free-field outdoor levels of 69dB L_{den} (or²⁶ 64 $L_{\text{Aeq},16\text{hr}}$). The corresponding internal noise levels are²⁷ approximately 54dB $L_{\text{Aeq},16\text{hr}}$ (open windows), 48dB $L_{\text{Aeq},16\text{hr}}$ (tilted windows) and 36dB $L_{\text{Aeq},16\text{hr}}$ (closed windows).

For construction noise the latest revision of the DMRB makes reference to Section E3.2 and Table E.1 in Annex E (informative) of BS 5228-1:2009+A1:2014 [10] for the definition of SOAELs. Table E.1 of BS 5228-1:2009+A1:2014 provides examples of threshold values in three categories, based on existing ambient values. Threshold values are higher when ambient noise levels are higher. Daytime (07:00-19:00, weekdays) thresholds can be traced back to principles promoted by the Wilson Committee in 1963 [11]: “Noise from construction and demolition sites should not exceed the level at which conversation in the nearest building would be difficult with the windows shut.” The Wilson committee also recommended that “Noisy work likely to cause annoyance locally should not be permitted between 22.00 hours and 07.00 hours.” BS 5228 states that these principles have been expanded over time to include a suite of noise levels covering the whole day/week period taking into account the varying sensitivities through these periods.

With reference to the noise exposure hierarchy table in the Planning Practice Guidance (Noise) [14], PHE is not aware of good quality scientific evidence that links specific noise levels to behavioural/attitudinal changes in the general population. Reactions to noise at an individual level are strongly confounded by personal, situational and environmental non-acoustic factors [16, 17], and large inter-personal variations are observed in the reaction of a population to a particular noise level [18-21]. For these reasons PHE is not able to provide evidence-based general recommendations for SOAELs that are able to achieve the aims and objectives of the Noise Policy Statement for England and the Planning Practice Guidance on noise. DMRB allows for project specific LOAELs and SOAELs to be defined if necessary, and PHE recommends that for each scheme the Applicant gives careful consideration of the following:

- i. The existing noise exposure of affected communities – in particular, consideration of any designated Noise Important Areas identified in proximity to the scheme;
- ii. The size of the population affected – for example an effect may be deemed significant if a large number of people are exposed to a relatively small noise change;
- iii. The relative change in number and type of vehicle pass-bys;
- iv. Changes in the temporal distribution of noise during day/evening/night, or between weekdays and weekends;

²⁴ As defined in the Noise Policy Statement for England [3] and the Planning Practice Guidance [14].

²⁵ Using equation 4.16 from [22], assuming free-field levels; $L_{A10,18\text{hr}}$ (free-field) = $L_{A10,18\text{hr}}$ (façade) – 2.5dB(A) as per CRTN [13].

²⁶ Using conversion factors in para. 2.2.13 Transport Analysis Guidance (TAG) Unit A3 [15]

²⁷ Using external – internal level differences reported by Locher et al. (2018) [12], based on measurements at 102 dwellings in Switzerland in 2016.

- v. Soundscape and tranquillity, in particular the value that communities put on the lack of environmental noise in their area, or conversely, on the lack of public areas within walking distance that are relatively free from environmental noise;
- vi. Opportunities for respite (predictable periods of relief from noise), either spatially or temporally;
- vii. Cumulative exposure to other environmental risk factors, including other sources of noise and air pollution,
- viii. Local health needs, sensitivities and objectives.

The WHO Environmental Noise Guidelines (2018) do not define LOAELs for environmental noise sources, partly because the scientific evidence suggests that there is no clear threshold where adverse impacts on health and quality of life cease to occur in the general population. Based on the systematic reviews that informed the 2018 WHO Environmental Noise Guidelines [2], the daytime operational noise LOAEL quoted in DMRB is equivalent to approximately 8% of the population Highly Annoyed²⁸, and the night time LOAEL is equivalent to approximately 2% of the population Highly Sleep Disturbed²⁹. Therefore, the impact assessment should acknowledge that adverse health effects will occur beyond the assessment threshold (LOAEL). PHE recommends that the Applicant explains what its chosen SOAELs for a specific scheme mean in population health terms in a similar fashion.

PHE does not believe that the current scientific evidence supports the modification of SOAELs and UAELs based on the existing noise insulation specification of residential dwellings, and in particular whether enhanced sound insulation avoids significant adverse effects on health and quality of life. See also sections on *Mitigation* and *Step Changes in Noise Exposure*.

Health Outcomes

PHE encourages the applicant to present noise exposure data in terms of the L_{den} metric (in addition to L_{eq} and L_{10}), to facilitate interpretation by a broad range of stakeholders. This is because most recent scientific evidence on the health effects of environmental noise is presented in terms of L_{den} [1, 5, 6]. PHE believes that quantifying the health impacts associated with noise exposure and presenting them in health-based metrics allows decision makers to make more informed decisions.

For transportation sources, PHE recommends the quantification of health outcomes using the methodology agreed by the Interdepartmental Group on Costs and Benefits - Noise subgroup [IGCB(N) [23] (currently under review)], and more recent systematic reviews [1, 5, 6]. PHE believes there is sufficient evidence to quantify the following health outcomes: long-term annoyance, sleep disturbance, ischaemic heart disease (IHD), and potentially stroke³⁰ and diabetes³¹. Effects can be expressed in terms of number of people affected, number of disease cases, and Disability Adjusted Life Years (DALYs). THE IGCB(N) guidance can also be used to translate these effects into monetary terms.

Some health outcomes, namely annoyance and self-reported sleep disturbance, can be influenced by the local context and situation. In these cases, it would be preferable to use exposure-response functions (ERFs) derived in a local context. However, PHE is not aware of any ERFs for road traffic

²⁸ 55 dB $L_{A10,18hr}$ (façade) is approximately equal to 57 dB L_{den} (free-field), assuming motorway traffic [13, 22]. Applying the exposure-response function presented in Guski et al., 2017 [19] for road traffic noise and annoyance (excluding Alpine and Asian studies), approximately 8% of a population is highly annoyed at 57 dB L_{den} .

²⁹ Applying the exposure-response function presented in Basner et al., 2018 [20] for road traffic noise and sleep disturbance gives the result that approximately 2% of a population is highly sleep disturbed at 40 dB L_{night} .

³⁰ A literature review commissioned by Defra [6] identified nine longitudinal studies on road traffic noise and incidence of stroke, and eight longitudinal studies on road traffic noise and stroke mortality.

³¹ A literature review commissioned by Defra [6] identified four longitudinal studies on road traffic noise and incidence of diabetes.

being available for a UK context from data gathered in the last two decades. Therefore, in PHE's view the ERFs presented in the WHO-commissioned systematic reviews offer a good foundation for appraisal of the health effects associated with road traffic noise [2]. For annoyance, the average curve derived excluding Alpine and Asian studies may be considered more transferable to a UK context. For metabolic outcomes, no ERF was published in the WHO ENG 2018. A recent meta-analysis of five cohort studies of road traffic noise and incidence of diabetes was reported by Vienneau in 2019 [24].

Where schemes have the potential to impact a large number of people, PHE expects the Applicant to carry out literature scoping reviews to ensure that the most robust and up-to-date scientific evidence is being used to quantify adverse effects attributable to the Scheme.

PHE expects to see a clear outline of the steps taken to arrive at the final judgement of significance based on these health outcomes, including a description of local circumstances and modifiers anticipated, and how reasonably foreseeable changes in these circumstances will be dealt with during the assessment process.

Identification and Consideration of Receptors

The identification of noise sensitive receptors in proximity to the proposed scheme - or route options - is essential in providing a full assessment of potential impacts. Examples of noise sensitive receptors include but are not limited to:

- i. Noise Important Areas
- ii. Residential areas
- iii. Schools, hospitals and care homes
- iv. Community green and blue spaces and areas valued for their tranquillity, such as local and national parks
- v. Public Rights of Way (PRoWs)

Noise Important Areas (NIAs) are areas with the highest levels of noise exposure at a national level and as such require very careful consideration in terms of protection from increased noise levels as well as opportunities for noise mitigation that can lead to an improvement in health and quality of life. DMRB requires a list of noise mitigation measures that the project will deliver in Noise Important Areas. PHE supports this requirement - new development should offer an opportunity to reduce the health burden of existing transport infrastructure, particularly for those worst affected. PHE would encourage this approach to extend beyond NIAs, in line with the third aim of NPSE [3].

Baseline Sound Environment

The greater the understanding of the baseline sound environment, the greater the potential for the assessment to reflect the nature and scale of potential impacts, adverse or beneficial, associated with the Scheme. PHE recommends that traditional averaged noise levels are supplemented by a qualitative characterisation of the sound environment, including any particularly valued characteristics (for example, tranquillity) and the types of sources contributing to it [25].

PHE recommends that baseline noise surveys are carried out to provide a reliable depiction of local diurnal noise variations for both weekdays and weekends, in a variety of locations, including the difference between day (07:00-19:00), evening (19:00-23:00) and night-time (23:00-07:00) periods. This is particularly important if there are areas within the scheme assessment boundary with atypical traffic day/evening/night distributions. Achieving these aims is likely to require long-term noise monitoring in multiple locations for a period greater than seven days. This information should be used to test the robustness of any conversions between noise metrics (e.g. converting from $L_{A10,18hr}$ to $L_{Aeq,2300-0700}$ and L_{den}).

PHE suggests that a variety of metrics can be used to describe the sound environment with and without the scheme – for example, levels averaged over finer time periods, background noise levels expressed as percentiles, and number of event metrics (e.g. N65 day, N60 night) – and that, where possible, this suite of metrics is used to inform judgements of significance. There is emerging

evidence that intermittency metrics can have an additional predictive value over traditional long-term time-averaged metrics for road traffic noise [27].

Mitigation

PHE expects decisions regarding noise mitigation measures to be underpinned by good quality evidence, in particular whether mitigation measures are proven to reduce adverse impacts on health and quality of life. For interventions where evidence is weak or lacking, PHE expects a proposed strategy for monitoring and evaluating their effectiveness during construction and operation, to ensure the effectiveness of said measures.

With regards to road traffic noise, low-noise road surfaces, acoustic barriers, traffic management and noise insulation schemes can all be considered. Priority should be given to reducing noise at source, and noise insulation schemes should be considered as a last resort. PHE expects any proposed noise insulation schemes to take a holistic approach which achieves a healthy indoor environment, taking into consideration noise, ventilation, overheating risk, indoor air quality and occupants' preference to open windows. There is, at present, insufficient good quality evidence as to whether insulation schemes are effective at reducing long-term annoyance and self-reported sleep disturbance [28], and initiatives to evaluate the effectiveness of noise insulation to improve health outcomes are strongly encouraged.

PHE notes the suggestion in DMRB methodology that post-construction noise monitoring cannot provide a reliable gauge for reference against predicted impacts of operational noise. The issues highlighted in DMRB relate to noise exposure, and not to health outcomes. PHE suggests that monitoring of health and quality of life can be considered pre and post operational phases, to ascertain whether mitigation measures are having the desired effect for local communities.

PHE expects consideration of potential adverse effects due to noise and vibration during construction and recommends that a full and detailed Construction Environmental Management Plan (CEMP) is developed and implemented by the Applicant and/or the contractor responsible for construction. PHE recommends that the CEMP includes a detailed programme of construction which highlights the times and durations of particularly noisy works, the measures taken to reduce noise at source, the strategy for actively communicating this information to local communities, and procedures for responding effectively to any specific issues arising.

There is a paucity of scientific evidence on the health effects attributable to construction noise associated with large infrastructure projects [5, 6] where construction activities may last for a relatively long period of time. PHE recommends that the Applicant considers emerging evidence as it becomes available and reviews its assessment of impacts as appropriate.

Green Spaces and Private Amenity Areas

PHE expects proposals to take into consideration the evidence which suggests that quiet areas can have both a direct beneficial health effect and can also help restore or compensate for the adverse health effects of noise in the residential environment [29-31]. Research from the Netherlands suggests that people living in noisy areas appear to have a greater need for areas offering quiet than individuals who are not exposed to noise at home [29]. Control of noise at source is the most effective mitigation for protecting outdoor spaces; noise insulation schemes do not protect external amenity spaces (such as private gardens and balconies or community recreation facilities and green spaces) from increased noise exposure.

PHE expects consideration to be given to the importance of existing green spaces as well as opportunities to create new tranquil spaces which are easily accessible to those communities exposed to increased noise from the scheme. These spaces should be of a high design quality and have a sustainable long-term management strategy in place.

Step-changes in Noise Exposure and the Change-effect

The Applicant should take into consideration the "change-Effect", i.e. the potential for a real or anticipated step-change in noise exposure to result in attitudinal responses that are greater or lower than that which would be expected in a steady state scenario [28, 32]. Where a perception of

change is considered likely, PHE recommends that the change-effect is taken into account in the assessment for the opening year of the proposed development. For longer term assessments, the effects of population mobility need to be taken into consideration.

Community Engagement and Consultation Feedback

PHE recommends that public consultations carried out during the planning application process clearly identify the predicted changes to the sound environment during construction and operation of the Scheme, the predicted health effects on neighbouring communities, proposed noise mitigation strategies and any proposed measures for monitoring that such mitigation measures will achieve their desired outcomes.

PHE encourages the Applicant to use effective ways of communicating any changes in the acoustic environment generated by the scheme to local communities. For example, immersive and suitably calibrated audio-visual demonstrations can help make noise and visual changes more intuitive to understand and accessible to a wider demographic. If the proposed scheme will have an impact over a relatively large geographical area, the Applicant should consider community-specific fact-sheets and/or impact maps, which are easily accessible to all individuals both in hard copy and online. If online, search functionality can potentially be included, for example, by postcode.

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Alison Down,
EIA Advisor on behalf of the Secretary of State
Environmental Services
Operations
Temple Quay House
2 The Square
Bristol, BS1 6PN

Our Ref: A358/EIA scoping/JCAB
Your Ref: TR010061-000008
Date: 22nd April 2021

By e-mail only to:
C/o, A358Dualling@planninginspectorate.gov.uk

Dear Madam,

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations).

Application by Highways England for an Order granting Development Consent for the A358 Taunton to Southfields Dualling Scheme.

Scoping consultation and notification of the Applicant's contact details and duty to make available information to the Applicant if requested

I thank you for allowing the Local Planning Authority at Somerset West and Taunton Council the opportunity to comment upon the current submitted Scoping Opinion. I can confirm that Somerset West and Taunton Council is an appropriate consultation body in this matter and I am pleased to make the following comments on the documentation submitted to date.

For the most part, the Local Planning Authority at Somerset West and Taunton Council is satisfied with the submission and has no further comments to make at this stage. However, there are a few specific issues I have identified, that I would be grateful if you could take into account.

In respect of the document 'Environmental Impact Assessment Scoping Report – Volume 1: Main Report (reference: HE551508-ARP-EGN-ZZ-RP-LE-000001), I have the following comments –

Section 7 (Cultural Heritage)

- The list of Grade I Heritage Assets at paragraph 7.3.3 should include Hatch Court. This is listed separately from the church of St. John the Baptist, which is

referenced in the document. Hatch Court is a grade I listed mansion built in about 1755 in the Palladian style. The site had been occupied since the mediaeval era by various forms of the manor house. Although Hatch Court might technically be just over the 1 km bandwidth for the study area, the importance of Hatch Court is such that it has to be considered in the survey. The potential impacts upon this Heritage Asset and its associated parkland (which is separately listed as a Grade II asset on the Register of Historic Parks and Gardens of Special Historic Interest in England, is likely to be significant. Please note that the parkland setting definitely comes within the 1 km bandwidth for the study area

- Although the listed parkland is referenced at paragraph 7.3.6, it is noted that there is no specific reference to this landscape feature in section 8 (landscaping) – only a very brief passing reference at the end of paragraph 8.3.11. The listed park and garden will need specific reference, assessment and careful mitigation in its own right, because this asset has a high landscape sensitivity and a consequential high visual sensitivity. It is assumed that the omission of any specific reference is an error and so it should be corrected.

Section 8 (Landscaping)

- Paragraph 8.3.22 identifies two specific viewpoints within the Blackdown Hills AONB, with views towards the line of the proposed new road alignment at Staple Hill and Castle Neroche. These are not the only two viewpoints from within the A.O.N.B that have sight of the existing and proposed A358 routes. In fact, I contend that these are probably not even the best viewpoints to assess the impact of the new road. They are certainly not the closest. Maybe other landmarks such as Pickeridge Hill or Orchard Wood (in between the settlements at Netherclay and Heale) could also be considered as representative of the potential impact upon views out from the A.O.N.B. No doubt the A.O.N.B. Service will have thoughts on this as well.
- Although the Hatch Beauchamp Conservation Area is referenced in Table 8.1, there is no reference here to the parkland, which is listed as a Grade II asset on the Register of Historic Parks and Gardens of Special Historic Interest in England. This is considered to be an unfortunate omission, given that it is a significant setting of landscape importance.
- I consider that the imposition of increased road signage, some of which will be large, lit and even gantry style, is a further source of potential adverse impact on the landscape resource, that should be referenced in paragraphs 8.4.2. and 8.4.13.

Section 9 (Biodiversity)

- It is not clear in paragraph 9.4.14 whether the term ‘operational road lighting’ is referring to fixed road lighting (road lighting columns, road sign lighting, gantry lighting and other operational lighting), or whether it is referring to additional lighting from vehicles (e.g. at night and poor weather conditions) caused by a predicted increase in vehicle usage of the road. The discussion of the effect of potential light pollution upon biodiversity, should refer to both. This should be included and reflected in table 9.5.
- There is no reference in this section to the fact that Somerset West and Taunton Council has declared an ecological emergency (which complements the climate emergency declaration it has also made). The motion recognises that societies and economies are intimately linked with and depend on

biodiversity and nature, and that steps need to be taken to protect and enhance our natural habitats. This declaration identifies, amongst its many aims, that the Council will work with local, county, regional and national partners to increase wildlife habitats, green infrastructure and natural capital in Somerset West and Taunton. It is not clear how Highways England intends to meet and support the aims of this declaration. A good starting point would be the recognition of this status within the scoping assessment.

Section 15 (Climate Change)

- No reference is made anywhere in this section to the fact that Somerset West and Taunton Council has declared a 'Climate Emergency'. The Council is committed to working towards making itself and the area it serves as a whole, carbon neutral by 2030. The Council has prepared a Carbon Neutrality and Climate Resilience (CNCR) Action Plan, building on the Somerset Climate Emergency Strategy. The Council's CNCR Action Plan details how the Council proposes to address the specific issues, meet the identified goals and deliver on the outcomes identified within it. It identifies a total of 345 potential actions to progress over the next ten years based on current understandings, but focuses on a Year 1 action plan with Year 2+ routemaps. This is considered to be an important consideration which should be referenced in the Environmental Statement for the A358 project.
- This section (15) needs to give much greater consideration to how the new road will assist in reducing carbon emissions by at least 80% (minimum) in 2050 from 1990 levels, as required by the Climate Change Act 2008. A new road, designed with significantly greater capacity and the intention to attract far greater volumes of traffic through the region, will inevitably lead to more traffic pollution and exhaust fumes. The document needs to be clearer on how the road can help reduce carbon emissions and what measures are being proposed to mitigate the associated unavoidable negative carbon impacts. It could for example consider encouraging a greater use of the road by public transport; the imposition of electric vehicle charging points along its route; use of renewable energy to power lighting to road signs and even lighting columns; the planting of trees, not just for landscaping and screening purposes, but also for carbon capture purposes; and the provision of cycle lanes. Some of this is alluded to in paragraph 15.5.2, but greater emphasis needs to be placed on these aims.

Appendix E (Provisional List of other developments for Cumulative Effects Assessment)

- There is one more Nationally Significant Infrastructure Project in the area that is worthy of a mention here, particularly as the new nuclear power station at HPC has been identified. This is the National Grid Hinkley Point C Connections Project, which was granted formal consent by the Secretary of State in February 2016 and is now being implemented. As with the new nuclear build though, this is unlikely to have any significant cumulative effects with the new road proposals.
- Appendix E references projects being implemented under the Transport and works act order (TWAo) and registers that there are none within 10 kilometres. I am aware of the Bridgwater Tidal Barrier Scheme which requires consent for construction and operation and this is being dealt with under the Transport and Works Act 1992. The application for a TWAo was submitted to the Secretary of State for Environment, Food and Rural Affairs, shortly before Christmas

2019. The works are primarily to construct a tidal barrier on the River Parrett to the north of Bridgwater. This is a joint scheme between the Environment Agency and Sedgemoor District Council. However, the Environment Agency is also planning to carry out additional works at 12 further sites, to remove barriers to fish and eel migration upstream of the barrier site, with five of these sites located within or near Taunton. Whilst the barrier itself may be (just) outside the 10 km search area (??), some of the satellite works on the tributaries will not be. So, this might be worth a mention at this point.

General omission

I am not certain which section this would best fit into, but there is no mention at all of the impact that the road will have in terms of light pollution, except in so far as it might impact upon biodiversity. What about the impact of increased lighting upon the 'dark skies' and landscaping in general? Whilst there are no parts of this area that benefit from either International Dark Sky Reserve Status or Dark Sky Park Status, this is a significantly rural area and does not suffer from general night time light pollution. Indeed, the Blackdown Hills A.O.N.B. is recorded as being the 5th darkest A.O.N.B. in England at night time. The potential of the new road, with its light junctions and signage and with the extra volumes of vehicles that it will attract, has the capacity to be significantly detrimental to the night time skies and for views in and out from the A.O.N.B. in particular. I would expect the Environmental Statement to cover this potential detriment and the current scoping exercise does not.

I hope you find this letter is of use to you, and I would be grateful if you could take the points it raises into account. However, should you require any further help or assistance in this matter, please do not hesitate to contact me.

Yours faithfully.

John Burton

Specialist (Hinkley Point and other Nationally Significant Infrastructure Projects)

Tel: [REDACTED]

Email: [REDACTED]@somersetwestandtaunton.gov.uk

From: [REDACTED]
To: [A358 Taunton to Southfields](#)
Cc: [REDACTED]
Subject: Re: T2SF - A358 Taunton to Southfields Dualling Scheme - EIA Scoping Notification and Consultation
Date: 23 April 2021 15:12:29

Dear Ms Down,

We confirm that Stoke St Mary Parish Council is one of the consultation bodies for this scheme.

We are obviously disappointed by the lack of time to respond. However, here are our main comments:

1. The report refers to noise mitigation measures such as low noise surfacing and noise barriers, amongst other measures. However, it makes no commitment to mitigate the impacts on health and quality of life from noise as a result of the new development. It is very concerning to see reference being made to the monetised noise benefit on those living close to the new alignment, when one key objective is "improve their quality of life".
2. Previous concern has been raised regarding the capacity constraints at the Nexus roundabout and J25 even with the original Pink route (138% degree of saturation). Now the Pink Modified route with no direct M5 south access roads (Junc A), there will be even more traffic through these junctions, with the consequent congestion backing up along the new A358. As the junction enhancements proposed are highly unlikely to alleviate this congestion at peak times, traffic will simply turn off at the new Mattocks Tree Green Junction leading to rat runs along narrow country roads to access Taunton and avoid J25. What measures do you propose to keep this traffic off these narrow lanes to eliminate any adverse environmental impact?
3. There is no reference made within the report to the land development pressures that have occurred purely as a result of the original A358 consultation in 2017. Given the significant areas of land now owned by Opportunist Developers, such as the 1154 acres by Taylor Wimpey at Orchard Portman, amongst many others along the northern section of the route, the A358 scheme should not facilitate significant housing development of Taunton across the existing M5 settlement boundary without further consultation with the Local Planning Authority and impacted communities (incl unparished wards).
4. All lobbying communications by developers and landowners (or their agents) should be openly & promptly published, as part of the transparency required of organisations such as HE, and their representatives.
5. During the second consultation HE chose not to meet with the Parishioners of Stoke St Mary Parish. Can we have confirmation that HE will meet with our parishioners to present their proposals over the coming months as the design progresses, and respond to questions.
6. Table 2-4 refers to diverting footpaths over the various bridges. In the case of the footpaths diverted via the Stoke Road overbridge, there are no pavements at any point along Stoke Road that can be used in place of the footpaths. Why not, as it poses additional risk hazards to those who would have used the existing footpaths?
7. One of the objectives of the scheme is to "reduce community severance", though there is no specific reference to social mobility, and the barrier that the A358 will cause splitting communities.

Please acknowledge receipt of these comments, and look forward to your responses to the points raised.

Kind Regards

Rob Hossell

Highways Officer

Stoke St Mary Parish Council

Comments on Highway England's Scoping Report for Environmental Impact Assessment of the proposed A358 dualling from West Hatch Parish Council.

West Hatch Parish Council (WHPC) thanks the Planning Inspectorate and Highways England (HE) for the opportunity to comment on the Scoping Report for the Environmental Impact Study (EIA) and responds under the following four headings:-

1. General Observations
2. Major Local Considerations
3. Suggested Mitigations
4. Summary

1. General Observations

The HM Government's Road Investment Strategy (RIS1 and RIS2) and the National Policy Statement for National Networks (NPSNN) both document the need for a strong Business Case. For example, NPSNN 4.5 states '*The economic case prepared for a transport business case will assess the economic, environmental and social impacts of a development.*' and RIS2 pg. 91 states '*We are committing funding to deliver the schemes named in RIS2 on the assumption that they continue to demonstrate a strong business case and and offer sufficient value for money to justify public investment*'. It appears to WHPC that this Business Case was last assessed in detail before RIS1, i.e. before 2014, and not presented in detail for the present EIA. It should be re-examined in the context of the late 2020s and should include impact on local businesses and traffic.

Similarly, although Option routes for the dualling are discussed in the A358 EIA, more fundamental '*Alternatives*', as demanded in NPSNN 4.26/27 and as presented on numerous occasions at prior consultation meetings and by correspondence with HE, do not appear to have been considered in HE's draft EIA. Such alternatives will be discussed later under Heading 3. Suggested Mitigations.

Perhaps more importantly, the Government recently revised targets for greenhouse gas emissions, following on from the Paris Agreement. Now set to be 68% of 1990 levels by 2030, the EIA Scoping document takes no account of these new targets which will inevitably mean the requirement for lower speeds on our roads and a concurrent reduced need for expressways.

In the past year there has been a major change in society's attitude to the importance of the global environment to the future of the planet. The effects of COVID on people's behaviour have demonstrated that it is possible to reduce greenhouse gases and enhance wildlife and biodiversity through changes in traffic activity. As planned the impact of the new road will have a major effect on our local environment which is very much against the trend of present societal expectations. The scoping document needs to take account of this change in expectation.

The Planning Inspectorate should be made aware of these deficiencies and ensure that they receive due attention.

2. Major Local Considerations

HE's A358 Section 2 dualling scheme proposes to close all direct crossings from Thornfalcon/Mattocks Green to Ashill, a distance of some 5 miles. The major concern of WHPC is that the Scope of the EIA does not sufficiently consider the impacts of this proposal on local residents, local businesses, local traffic flow, local social interactions, etc. These impacts will be discussed here under the broad heading of Population and Health. **The sections 13.4.31-41 of HE's EIA give a completely misleading impression of the likely impact on the local populace.**

Impacts on local Population and Health are an important consideration of government as expressed in the EU Directive, RIS, NPSNN and EIA documents. Thus, in NPSNN 4.15, it states that the *Directive specifically requires an EIA to identify, describe and assess effects on human beings ... includes effects on health*. WHPC believes that HE's Scoping Report does not achieve this. There is no detailed analysis on the potential disturbance to the local people which would impact on the health and well-being of communities either side of a dualled A358. Direct and indirect impacts of severance need to be considered.

Direct impacts include:-

- i. The severance impacts on families and friends split by the new proposal with its paucity of viable connections across the dualled highway. Following the pandemic, the ongoing reinstatement of these social links is having positive effects on the people's wellbeing. Further isolation would have a big impact.
- ii. Strongly related to well-being and mental health is the social contact provided by churches and social groups. Severance, e.g. by closure of Bickenhall Lane, will impact journeys across A358 to the parish church of St. Andrews and the WH Village Hall, local Scout troop premises at West Hatch, Neroche Film Night, Hatch Beauchamp Saturday Morning Market, Mobile library stops in Hatch Beauchamp, the planned community shop at Hatch Beauchamp, etc. All these and more activities support ties between our local communities either side of the A358.
- iii. The economic viability of agricultural and other businesses could be detrimentally impacted by severance leading to mental stress of the owners and workers. A prime example is the four businesses at Nightingale Farm; the new route is a 4-5 km detour through narrow, twisty lanes and the hamlet of Lower West Hatch – impossible for the large articulated vehicles servicing these premises. The owners and workers at these businesses are already stressed by worries about their future.
- iv. Similarly affected by this 4-5 km detour is access to the Huish Woods Scout Camp, which receives trivial, almost insulting, mention in HE's EIA (Table 13-10). This nationally and internationally renowned facility contributes to the well-being and social development of young people and is in full-time use throughout the summer.
- v. Also impacted by this detour is Somerset Progressive School, an amenity helping with the development of disadvantaged children. Its viability is questionable if severed as will occur with A358 dualling.
- vi. Closure of Bickenhall Lane will directly impact access from the north, south and east via the A358 to the nationally important RSPCA Centre for Wildlife and to a less extent the Farmers Arms (neither considered in HE's EIA).

The major indirect effect of severance is the impact of consequential changes in traffic flow. Although these are difficult to predict, HE have not provided significant analyses of these changes, nor are such analyses proposed in detail in the EIA Scoping Report. However, severance, especially closure of the much-used Bickenhall Lane, inevitably will result in an increase in traffic along local lanes trying to find places to cross or join the A358. (Griffin Lane, touted as a potential crossing route and much used by walkers, cyclists and horseriders (WCH) is unsuitable for normal traffic, very narrow, twisty and steep and only two passing places over the steep parts.) This will clearly be the case for traffic, emanating from and to the Bickenhall, Curland, Staple Fitzpaine, Slough Green, etc, areas, trying to access or cross the A358 to head for Ilminster and the A303 or for Taunton and the M5 or for North Curry, Langport, etc. This increase in vehicular traffic will include domestic cars, service and delivery vans, bigger lorries, large agricultural and contractor vehicles, etc, etc. Roads in and around West Hatch and Slough Green are much used by WCH, and within 200m of Thurlbear SSSI. Most of these roads are quite unsuitable for the large articulated, agricultural vehicles, etc, forced to use them because of severance. Our lanes do not have pavements, but rather defined footpaths, bridleways and cycle routes use the same space as motorised vehicles. The famous WCH Blackdown's Herepath shares stretches of the road in West Hatch and other parishes.

The proposed severance increases the risk of serious accidents.

The NSPNN requires that the EIA seriously considers, analyses and reduces the risk of accidents. Thus, NPSNN 4.64 asks that applicants demonstrate their proposed scheme is consistent with the National Strategic Framework for Road Safety, i.e. *show that they have taken all steps that are reasonably required to:*

- . *minimise the risk of death and injury arising from their development;*
 - . *contribute to an overall reduction in road casualties;*
 - . *contribute to an overall reduction in the number of unplanned incidents; and*
 - . *contribute to improvements in road safety for walkers and cyclists.*
- It is unclear to WHPC that HE have done or plan to do this in the HE's Scoping Report for the A358 EIA. They have not taken into account such considerations on local routes.

This, together with indirect impacts on human health and welfare need to be assessed in the EIA, including:-

- i. Mental stress of local inhabitants, particularly older residents, caused by driving with the increased traffic and consequent increased risk of accidents.
- ii. Mental and physical stress caused to walkers, cyclists and horse riders (WCH) using the local roads for pleasure, social activities or business.
- iii. Mental stress caused by noise, vibrations, diesel fumes and damage from large vehicles close to houses and gardens. Many local lanes pass very close to houses.

Other weaknesses in HE's Scoping Report for the A358 EIA include:-

Emission calculations should be updated, considering impact of government's new policies (see General Observations above) and requiring recalculation of carbon and nitrogen oxides emission savings for the years 2024-6 when i) electric cars will already be reducing traffic emissions and ii) slow and heavy local traffic will have increased.

Need for an assessment of Impact on flora, fauna etc of increased local traffic through areas close to SSSIs and LNRs, hedges and verges, etc.

Need for balancing alleged decrease risk of accidents on the Southfields to Mattocks Green section of the dualled A358 with the increased risk of accidents on local roads as a result of severance and increased local traffic. The accident rate on the present A358 is already significantly less than the national average (HE EIA 13.3.55).

3. Suggested Mitigations.

WHPCouncil and other parish councils along Section 2 of the A358 are concerned and convinced that HE's proposal for dualling will not have the desired effect of reducing congestion and speeding traffic flow but will have the undesired effect of separating communities and increasing local traffic problems.

In consultation with other local councils along Section 2 of the HE proposed scheme, WHPC has made suggestions for mitigating these issues.

1. Mitigation to ease Congestion at Southfields.

As local residents and frequent users of the A358, we are aware of the major issues affecting traffic flow. Congestion is an issue at both the Southfields and M5 junctions, with occasional minor collisions. Flow along the Section 2 of the A358 generally, however, progresses smoothly and safely with speeds between 50 and 60 mph from Southfields to the traffic lights at Thornfalcon. The HE proposed dualling of the A358 will not reduce this congestion and only have a minor effect (<3 min) on journey time.

Congestion at Southfields will only be reduced by increasing capacity of the roundabout itself and providing extra designated lanes, e.g. from 200m on the eastbound A358 before, round and on the A303 after the roundabout. West bound congestion from the A303 to the A358 will also require a designated lane or two separate from the roundabout itself.

This suggestion then makes redundant any need for dualling the A358 Section 2 to Thornfalcon. Some minor works, e.g. slip roads, at local junctions would be helpful but not essential.

Even if dualling goes ahead, this suggested work should be done first.

2. Mitigation for severance and local traffic increases.

In respect of severance, NSPNN3.22 states '.... *applicants should seek to deliver improvements that reduce community severance and improve accessibility.*'

If suggestion 1. above is not adopted, WHPC and other local councils have developed schemes which would allay or ameliorate some of the concerns expressed above under Major Local Considerations.

There is an agreed local need for access on and off the A358 between Ashill and Mattocks Green. We propose that the service road from Ashill to Hatch Beauchamp overbridge be extended west to Bickenhall Lane and a slip road provided there on to the west bound carriageway. A west bound slip on to the service road should also be provided off the A358 at the Ashill end. We also propose slip road access on to and off the eastbound carriageway of the dualled A358 at Hatch Beauchamp Village Road. These four simple slip roads together with the extended service road will allow access on and off the A358 in both directions for traffic from Hatch Beauchamp, Hatch Green, Bickenhall, Curland, Staple Fitzpaine, Slough Green, West Hatch, Curry Mallet, Beercombe and, with a short extension, from Capland and Stewley.

Bickenhall Lane is chosen because it is presently a preferred local route (HE's traffic analysis) and provides convenient access to the RSPCA premises.

Interestingly slip roads appear to take priority over dualling in NSPNN 2.23.

A final suggestion to mitigate against the ludicrous proposed route from the A358 to the Somerset Progressive School, the Huish Woods Scout camp and the four businesses at Nightingale Farm. Rather than the 4-5km tortuous route, WHPC suggests a spur be taken off

the south roundabout at Mattocks Green or off the Ashe Farm Road possibly using the dismantled railway to provide easy access to the premises.

These suggested improvements will considerably reduce traffic through Ashill, Hatch Beauchamp, Slough Green, etc. and we strongly recommend their consideration in the revised EIA and by the Planning Inspectorate.

3. Summary.

WHPC along with other local parish councils believe that HE has not made a satisfactory case for dualling the full length of the A358.

The proposed dualling will not ease the major problems to traffic flow which are at both ends of the A358, particularly at Southfields.

HE has not investigated the direct and indirect effects of increased local traffic resulting from severance of local connections.

HE has not considered strong arguments and scheme improvements, presented at local consultations and by mail from Parish Councils over several years.

Through consultation and joint meetings, local Parish Councils are in general agreement with this WHPC report.

We trust that the Planning Inspectorate will ensure that HE include the above concerns in a revised A358 Environmental Impact Assessment Scoping Report.

We further trust that the Planning Inspectorate will give our views and ideas full consideration and present them to the Secretary of State at the appropriate time.

Thank You

David Lodge,
Planning Officer,
West Hatch Parish Council,
28th April 2021.

From: clerk@westmonkton.net
To: [A358 Taunton to Southfields](#)
Subject: T2SF - A358 Taunton to Southfields Dualling Scheme - EIA Scoping Notification and Consultation
Date: 30 April 2021 10:05:14

T2SF - A358 Taunton to Southfields Dualling Scheme - EIA Scoping Notification and Consultation
<https://infrastructure.planninginspectorate.gov.uk/projects/south-west/a358-taunton-to-southfields/> Deadline 30th April 2021.

The Parish Council has considered the above consultation and has the following comments to make:

The Parish Council has concerns about the following environmental impacts of the proposal:

- Loss of trees
- Light pollution
- Impact on Bat lines
- Proximity to ancient woodland including Huish Woods and Stoke Hill
- Impact on biodiversity / wildlife
- The volume of land take included in the proposal and the particularly large junction proposed at Thornfalcon
- Noise pollution, detracting from the environment in the nearby woodland used as a scout and guide camp.

The Parish Council requests that the following mitigation measures are considered and included in the proposal:

- Planting of species to absorb particulates. The Royal Horticultural Society (RHS) states that: 'the bushy, hairy-leafed *Cotoneaster franchetii* is the latest 'super plant' to help boost the environment and improve human health because of its special ability to fight pollution by trapping harmful airborne particles'. A new RHS science paper that looks at the effectiveness of hedges as air pollution barriers reveals that in traffic hotspots, the *Cotoneaster franchetii* (Franchet's cotoneaster) is at least 20% more effective at soaking up pollution compared to other shrubs.' The Parish Council suggests planting of this type of shrub along the sides of the proposed new road to protect humans and livestock.
- Landscaping to protect surrounding areas and acoustic fencing.
- Preventative measures to avoid light pollution.

If you have any queries, please contact me.

Kind regards

Amy Shepherd
Clerk to West Monkton Parish Council



~~~~ By replying to this email you accept that any personal information therein is subject to the requirements of the General Data Protection Regulation 2018 and WMPC Privacy policy  
<https://westmonkton.net/wp-content/uploads/privacy-policy/WMPC-Privacy-Policy-June2018-1.docx>

30<sup>th</sup> March 2021

Alison Down  
EIA Advisor  
The Planning Inspectorate  
Environmental Services Operations  
Temple Quay House  
2 The Square  
Bristol  
BS1 6PN

Highways and Environment  
County Hall  
Bythesea Road  
Trowbridge  
Wiltshire  
BA14 8JN

Your ref: TR010061-000008  
Our ref: A358 Taunton to Southfields  
ES Scoping Report Letter

Dear Ms Down,

**RE: A358 Taunton to Southfields Dualling Scheme – Scoping Consultation for Environmental Statement (ES) for Proposed Development**

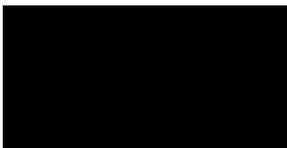
Thank you for your letter dated 26<sup>th</sup> March 2021 informing Wiltshire Council of Highway's England (the Applicant) application for an Order granting Development Consent for the A358 Taunton to Southfields Dualling Scheme (the Proposed Development) and seeking the Council's input into the scope of the Environmental Statement (ES) relating to this scheme.

Wiltshire Council can confirm that it does not have any comments on the Scoping Report for the A358 Taunton to Southfields Dualling Scheme.

The Council notes the name and address of the Applicant and also confirms that it will make available information in its possession that is considered relevant to the preparation of the Environmental Statement, if requested to do so by the Applicant.

Wiltshire Council welcomes the application for Development Consent for this scheme. Please do not hesitate to contact us if we can be of any further assistance in this matter.

Yours sincerely,



Parvis Khansari  
Director  
Highways and Environment

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