

## **Appendix E – Organisation responses by letter to consultation**

This appendix outlines in full, all responses received from organisations. Highways England has responded to points raised in the following correspondence in Appendix D.

This appendix includes responses from:

- **A303/A358/A30 Steering Group**
- **Babcary Parish Council**
- **British Horse Society**
- **Campaign for Better Transport**
- **Campaign to Protect Rural England**
- **Carry Moor Parish Council**
- **CLA**
- **The Heart of the South West Local Enterprise Partnership**
- **Historic England**
- **Ilchester Parish Council**
- **King's School, Bruton**
- **National Trust**
- **Natural England**
- **National Farmers Union**
- **Somerset County Council**
- **Ramblers Association**
- **Somerset County Council**
- **Somerset Wildlife Trusts**
- **South Somerset Bridleways Association**
- **Sparkford Parish Council**
- **The Coal Authority**
- **West Camel Parish Council**
- **Woodland Trust**



Fri 17/03/2017 16:38

Mike O'Dowd-Jones <MODowdJones@somerset.gov.uk>

Consultation response from the A303/A358/A30 Steering Group

To A303 Sparkford to Ilchester Dualling

Cc Stock, David



A303 Steering Group Response Sparkford to Ilchester March 2017.pdf  
3 MB

Please see attached a response to the current consultation on the A303 Sparkford to Ilchester Improvement Scheme on behalf of the A303/A358/A30 Steering Group comprising Somerset, Devon, Wiltshire and Dorset Council's along with the Local Enterprise Partnerships covering those areas.

A separate detailed response will follow in due course from Somerset County Council.

Kind Regards

**Mike O'Dowd-Jones**

Strategic Commissioning Manager – Highways and Transport  
Somerset County Council on behalf of the A303/A358/A30 Steering Group

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Travel safely: [www.somersetroadsafety.org](http://www.somersetroadsafety.org)

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17 March 2017

To Highways England  
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### **A303 Sparkford to Ilchester Consultation on Proposed Options**

This is a response to the consultation on proposed options from the A303/A358/A30 Steering Group comprising representatives of Somerset County Council, Devon, County Council, Wiltshire Council, Dorset County Council, the Heart of the South West Local Enterprise Partnership and Swindon & Wiltshire Local Enterprise Partnership.

We are pleased that the Government is following through on commitments within the Road Investment Strategy to upgrade all remaining sections of the A303 between the M3 and the A358 to dual carriageway standard, together with creating a dual carriageway link from M5 at Taunton to the A303, as part of a long-term commitment to creating a new Expressway to the South West. The Government has also committed to set aside funding for smaller-scale improvements to the A303/A30 section between Southfields and Honiton to improve safety and journey quality for road users.

These investments are vitally important to the UK and South West economy as demonstrated by our independent economic assessment, validated by DfT, which demonstrates that improving the whole A303/A30/A358 corridor would:

- create 21,400 jobs and deliver a £41.6bn boost to the economy
- deliver £21.2bn of taxation, welfare savings, disposable income and tourism benefits
- create £1.9bn in transport benefits from reduced journey times and greater resilience
- save 1807 fatal or serious casualties
- reduce carbon emissions by 9%

In our view it is vital that the Government delivers these improvements on the ground at the earliest opportunity, and that the detailed design of the schemes is such that the full potential of the improvements in delivering economic growth and productivity benefits for the region and the UK can be realised.

The Steering Group believes that commentary on the choice of route for the Sparkford to Ilchester Improvement, is primarily a matter for the local communities and the locally elected authorities. Somerset County Council will submit its own separate response to the consultation.

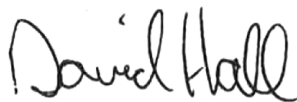
The Steering Group's desire is for the improvement scheme to maximise both the transport economic benefits and safety benefits by gaining the greatest possible reduction in journey times and collisions; providing junctions with adequate capacity

to accommodate peak traffic flows at strategic points of access to other key road links; and ensuring there are good strategic connections with economic growth centres to maximise the wider economic benefits of the scheme for business productivity.

The economic assessment produced by the Steering Group demonstrates that the full economic benefit of the improvements can only be achieved by providing an 'end-to-end' dual carriageway standard route linking the M3 with the M5 and urges the Government to provide sufficient resource within the road investment strategy to deliver this outcome.

The Sparkford to Ilchester scheme along with the other schemes currently being progressed at Amesbury to Berwick Down and Ilminster to M5 at Taunton are vital first steps towards achieving a whole route improvement, and as such are strongly supported by the Steering Group.

Yours Sincerely

A handwritten signature in black ink that reads "David Hall".

**Cllr David Hall**

Deputy Leader of Somerset County Council and Cabinet Member for Business, Inward Investment and Policy

A handwritten signature in black ink that reads "Andrew Leadbetter".

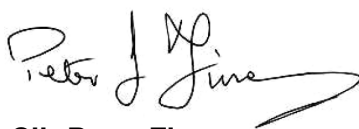
**Cllr Andrew Leadbetter**

Cabinet Member for Economy. Devon County Council

A handwritten signature in blue ink that reads "Fleur de Rhe-Philippe".

**Cllr Fleur De Rhe-Philippe**

Cabinet Member for Economy, Transport and Skills. Wiltshire Council

A handwritten signature in black ink that reads "Peter J. Finney".

**Cllr Peter Finney**

Deputy Leader of Dorset County Council and Cabinet Member for Environment



Wed 22/03/2017 14:29

Simon Hoar <sihoar@yahoo.co.uk>

A303 Dualling Consultation - Parish Council

To A303 Sparkford to Ilchester Dualling

Cc Jasmine Tucker



I write on behalf of Babcary Parish Council (which lies immediately to the North of the proposed road and will be effected by any changes) to express our unanimous opposition to the Option 2, Sparkford Vale, route.

I would be grateful if you would give due consideration to the following:

1. Option 1 is essentially a brownfield site; it utilises the existing major trunk road to a considerable extent; impacting on homes and businesses already blighted by proximity to a main road. Option 2 is literally a greenfield site; it would put 3 miles of tarmac through the remarkably unspoilt Sparkford Vale and lose it for ever. Sparkford Vale is a sparsely populated and undeveloped farmland area rich in wildlife, very quiet and very dark (at night). This will be destroyed.
2. Sparkford Vale is very flat, low lying, and already prone to flooding. The Environment Agency flood map doesn't show it but the lane from Steart Hill to Babcary regularly floods throughout it's length and is impassable to ordinary vehicles perhaps two or three times a year. Three miles of tarmac will create more of a problem. Where will the run off go? What will be done to prevent the existing flooding of Steart Lane from becoming worse? How much will the new road need to be raised to avoid this? How much more screening of light and noise pollution will be needed as a result? How much will all this cost? From talking to Highways England staff at consultation sessions it appears that the true costs of this option are very unclear.
3. Sparkford Vale is prone to low lying fog. This is particularly the case at the foot of Steart Hill where it seems to "pool". This will create a severe risk for high speed traffic. What can be done to mitigate this risk?
4. Option 2 will be detrimental to four farm businesses in Sparkford Vale by carving a line right through them.

Save the Sparkford Vale!

many thanks

*Simon*

Simon Hoar  
Chairman, Babcary Parish Council

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## A303 Sparkford to Ilchester Dualling Scheme Public Consultation

### Response of The British Horse Society

The consultation does not appear to accord with Highways England recently published Accessibility Strategy.

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/526226/S150749\\_Accessibility\\_Strategy\\_4pp\\_V3.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/526226/S150749_Accessibility_Strategy_4pp_V3.pdf)

This Strategy states:-

‘Our vision focuses on supporting our road users’ journeys, pedestrians, cyclists, equestrians, those with disabilities (such as users with mobility or sensory impairments) and other vulnerable users – while delivering longer-term benefits for communities and users alike. We want to address the barriers our roads can sometimes create, help expand people’s travel choices, enhance and improve network facilities, and make everyday journeys as easy as possible. This will be achieved by ensuring our network supports and contributes to accessible, inclusive and integrated journeys which are safe, secure, comfortable and attractive.

Update our design standards and assessment tools to raise the level of provision for vulnerable users on our network and improve the capability of our planners, designers, supply chain and service providers through training and development. This will also support us to meet our obligations under current equality legislation.

Improve our engagement with key stakeholders and delivery partners, pursuing a collaborative approach to the identification, development and implementation of interventions

Increase awareness of vulnerable users and support their confidence and hazard awareness by working with partners to deliver positive messaging about safety for all users of the network.

Develop and deliver programmes of work which support the development of a safer, more secure, convenient, comfortable, and attractive network. This will incrementally improve and upgrade crossings across the network, increase the provision of dedicated multi-user routes, and accommodate multiple users on existing routes.

Ensure that wider network investments incorporate facilities for vulnerable users. For example, when we invest in road network improvements, the needs of these will be considered, both during design, construction and as part of any completed scheme. As we invest in network maintenance, we will consider opportunities to improve provision.’

Nor does it appear to comply with many of Transport Focus' recommendations in ' Cyclists, pedestrians and equestrians: a summary of priorities for Highways England's Network' which state:-

- User input to design – prior to any new scheme entering the design process, Highways England should engage with cyclists, pedestrians and equestrians to ensure that their needs are at the heart of planning. This should include national representative groups for generic input which can then be shared internally within Highways England. Local user groups should also be consulted for project-specific detail. If designs change after initial engagement, Highways England should re-engage to find the next best solution.
- Crossing the network – any new road scheme or major upgrade should incorporate crossings for cyclists, pedestrians and equestrians from the very beginning, taking into account both current and potential use. These should, where possible, be along 'lines of desire' between key points. Careful thought should be given to installing the most appropriate type of crossing whether it be on the surface, an underpass or bridge.
- Connecting networks – careful thought should be given to how crossing roads can improve connectivity between communities and amenities. This should include collaboration with local authorities and local interest groups to maximise strategic and county-wide schemes to encourage non-motorised travel.
- Junctions and roundabouts – Highways England should seek to improve the experience of cyclists, pedestrians and equestrians at junctions and roundabouts. This should include the creation of traffic-free alternative routes.
- Segregated paths – Highways England should investigate ways for new and existing road schemes to incorporate segregated paths for cyclists, pedestrians and equestrians. Where possible these should be physically separated from the carriageway, but with minimal diversion from the intended route.
- Connecting Public Rights of Way (PRoW) – where a PRoW commences or terminates at the edge of a Highways England 'A' road, Highways England should explore options to connect it with a PRoW on the other side of the road, especially if they are staggered by only a few hundred metres. Where this is not practicable, Highways England should engage with landowners and local authorities with a view to re-routing rights of way or constructing a path outside the current Highway boundary.

The Society has the following specific comments in respect of the consultation:

1. Horse riders and carriage drivers are vulnerable road users and no mention or account of them is taken in this consultation. Best value would be to designate restricted byways rather than the proposed cycle paths.
2. Crossing points for all vulnerable users (not only pedestrians and cyclists), either by over bridge or underpass, should be to bridleway or restricted byway status.
3. Provision should be made for all vulnerable users at any at-grade crossing or junction.

4. Horse tourism is important and this means that cross county routes, both north to south as well as east-west, are vital. It is important that whichever route option is chosen does not sever any long distance routes.
5. Route option 1, which is mainly along the existing route, has some crossing points which have become dangerous for horse riders. If this option is chosen, we would expect these crossing points to be diverted onto a bridge or through an underpass.
6. There are a number of restricted byways, bridleways, and minor roads in the area through which Route option 2 will pass, and we would hope that Highways England will substitute new routes of the same status in lieu of any which have to be stopped up or diverted.
7. We believe that the definitive map is not up to date. For example, when this road was last improved in 1996 a bridleway was dedicated. Until recently, and possibly still, this has not yet been added to the Definitive map. We have repeatedly asked Somerset County Council to process this LEMO. Please be aware of this and other failings in the definitive map for Somerset. We are happy to provide further details in respect of these.
8. There are several routes which, we believe, have under-recorded rights. In due course we will submit DMMO applications for these, and they should then be taken into account in the ensuing consultation. In particular the bridleway which comes to the A303 at Camel Hill, and also a route from Camel Hill House, past Rewber Brake, and on to Vale Farm.

For Option 1, please could consideration be given to providing safe crossing points at the following:

1. Eastmead Lane/ Podimore Lane (ST 5527 2502) This already has a vehicular bridge and any replacement should be to the same standard)
2. Downhead Road/ Camel Cross (ST 5665 2491) Currently this junction is a confusion of an unclassified road from the north, a footpath crossing the A303 at grade, a class 2 road coming from the southwest, and a classified un-numbered road coming to within a short distance of the junction and terminating in a footpath. Obviously there will have to be some solution to make this crossing safe, and we request that it, whether over bridge or underpass, be made to at least restricted byway status.
3. Flowage crossing (ST 5710 2506) This crossing point currently takes riders from the restricted byway south of the A303 (Cottis Lane) across to connect up to Slate Lane. It is important to keep the north south crossing available, and obviously any improvement to safety would be welcome as this crossing is not currently safe.
4. Conegar Corner (ST 5785 2538) It is presumed that a bridge or underpass would be constructed to accommodate this crossing. If there is to be some form of at-grade junction, such as a roundabout, please could consideration be given to installing Pegasus crossing. This would satisfy cyclists as well as horse riders.
5. Traits Lane (ST 5874 2552). We understand that provision is already under consideration for this junction.



6. Sewed crossing at Camel Hill / Gason Lane (ST 5900 2555). This is important to horse riders and our association would be happy for some form of safe crossing could be provided, possibly combined with the one for Traits Lane. We believe that there are under-recorded bridleway rights going north west from this junction up to Vale Farm.
7. Fidge Copse (ST 5952 2570) We believe there are under-recorded bridleway rights at Fidge Copse and are submitting a DMMO application. It appears that this will join the section of the A303 which will be downgraded to a service road.

For Option 2, please could consideration be given to maintaining routes for vulnerable users where they already exist. Until the line of the route is more accurately drawn, there is little point in listing each potential crossing. What is important to us is to maintain and hopefully improve the north – south routes across the county.

Dated 24 March 2017

Mark Weston

Director of Access

The British Horse Society

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## **A303 Sparkford to Ilchester Consultation – response from Campaign for Better Transport**

### **Contents:**

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# 1. Campaign for Better Transport's Response

## 1.1 Introduction

Increasing road capacity will undermine key policy goals on environmental protection, modal shift, carbon reduction, air pollution and public health. A recent major report, reviewing over 80 Post Opening Project Evaluation reports on new roads, found that road building is failing to provide the congestion relief and economic boost promised, while devastating the environment<sup>1</sup>. Building new roads should therefore be considered as a last resort.

Given this evidence, we are concerned that new road building is being considered in this location before all other options have been fully appraised, contrary to the principles of sustainable development. The primary purpose of this scheme is not to improve the local environment, but as the consultation documents indicate, to contribute to a long distance cross-country route, at great financial and environmental cost. While any benefits would be only temporary, the adverse impacts would be permanent.

A truly sustainable approach would have considered other, less damaging alternatives first. Our preference for the A303/A30/A358 corridor would be for significant investment in rail infrastructure and services to the south west, combined with bus improvements (both local and longer distance) and local walking and cycling enhancements. Road alterations should be constrained to small-scale online improvements to address local environment, safety or severance issues, combined with a strategic approach to freight movements.

## 1.2 Opposition to offline proposals

We object to the offline proposals for the significant harm they would cause the local environment. While a seemingly attractive solution, as it would allow construction to take place while the A303 remained open, the cost of its impact on the surroundings, including loss of agricultural land, would be too high.

## 1.3 Concern about the online proposals

If this road is taken forward to construction, our preference would be for the online option as this corridor already is impacted upon by the road, so the footprint of this development would be smaller. However, it would not be without its issues. Aside from construction being more complex, a higher speed road would increase noise pollution for local residents, rising as it would to 70mph from the current 50mph limit. Air pollution is also likely to increase at these higher speeds.

There would also need to be greater thought given to severance issues as a dual carriageway would not be an attractive prospect for pedestrians and cyclists to either use, or to try and cross. Yet this issue appears to have received very little attention. It is mentioned that there would be a new bridge under the dual carriageway at Traits Lane, but no mention is made of new crossing points (bridges or underpasses) at:

- Downhead Lane / Plowgate Lane
- Steart Hill / Howell Hill
- Gason Lane

other than the existing junctions probably wouldn't be suitable for a new high speed dual carriageway.

## 1.4 Cumulative impacts not addressed

We are concerned that this scheme is being progressed at the same time as, but otherwise in isolation to, other schemes being proposed along the A303/A30/A358 corridor. This means that the full impact of these schemes is likely to be severely underreported. If all these sections are expanded to dual carriageways, alongside junction capacity increases, this is likely to result in a big increase in traffic along this corridor, both

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<sup>1</sup> "The end of the road? Challenging the road-building consensus", CPRE 2017

induced and reassigned from other routes, over and above what is estimated for each scheme in isolation. This will bring even greater noise and pollution than is currently being suggested.

Linked to the likely large increase in traffic along this corridor, it is most probable that carbon emissions will increase significantly. This will further undermine the ability of the Department for Transport to reduce carbon emissions from transport. Given that transport emissions have been flagged as being of concern by the Committee on Climate Change in its Progress Report to Parliament in June 2016, Highways England cannot keep ignoring the fact that its road building programme is driving up emissions.

### **1.5 Vulnerable road users**

We are very concerned that little information has been provided on what pedestrian and cycle facilities would be provided either to move along the A303 corridor or across it. Indeed, as noted above in 1.3, we are concerned that some important linkages across the A303 could be severed as there is no mention of them having new bridges or underpasses.

It is important that these links are kept open. While Highways England has said that it has monitored pedestrians and cycle movements, these may not be representative of what the potential, as the current A303 already forms a barrier to these modes.

New cycle facilities will need to be designed to the latest standards as laid out in Interim Advice Note: 195/16 and sealed surfaces of adequate width should be provided to ensure all cyclists can use them.

### **1.6 Conclusion**

Overall, we are not happy with the expansion of the A303/A30/A358 road corridor which, if all of the various single carriageway sections are converted into dual carriageways, will significantly increase traffic over and above what might be expected from expanding just one section in isolation. This will lead to a worsening of congestion overall and if it encourages more people to drive to the south west, it could overload many of the rural roads that are an attractive feature of the area.

It would be far better to encourage tourism and improve access by investing in public transport, walking and cycling to cut both longer distance and local motorised traffic.

**28 March 2017**

Chris Todd  
Campaign for Better Transport

Campaign for Better Transport's vision is a country where communities have affordable transport that improves quality of life and protects the environment. Achieving our vision requires substantial changes to UK transport policy which we aim to achieve by providing well-researched, practical solutions that gain support from both decision-makers and the public.

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Registered Charity 1101929. Company limited by guarantee, registered in England and Wales: 4943428



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[www.cpresomerset.org.uk](http://www.cpresomerset.org.uk)



By email to: [A303SparkfordtolchesterDualling@highwaysengland.co.uk](mailto:A303SparkfordtolchesterDualling@highwaysengland.co.uk)

24th March 2017

Dear Sirs

### A303 SPARKFORD TO ILCHESTER DUALLING

We are grateful for the opportunity to respond to the consultation on the proposals for widening the A303 from Sparkford to Ilchester and we would like to begin with the following **general statement**:

We feel that this consultation is fundamentally flawed. We are presented with a choice between two options, both of which will cause environmental damage and will, in our opinion, do little to lessen traffic problems in the long term. In addition to this, we consider that both options will fail to provide benefit to local communities and business. CPRE's new report ["The End of the Road"](#) provides compelling evidence that road-building is not delivering the congestion relief promised or the boost to local economies hoped for, while the environmental impacts are worse than feared. Our report found that:

- of 25 road schemes justified on the basis that they would benefit the local economy, only five had any evidence of any economic effects
- The effect of road schemes in generating traffic means that they also cause substantial increases in carbon emissions

"The End of the Road" proves that we need to reset roads policy - and also the pattern of car-dependent development that ensues - to reduce the need to travel by car and make road building the option of last resort.

The National Audit Office, has cast further doubt on the feasibility and value for money of these works in their recent report, "Progress with the Road Investment Strategy". The NAO has so far identified 16 projects which present a risk to value for money, including the

The Somerset Branch of the Campaign to Protect Rural England exists to promote the beauty, tranquility and diversity of rural England by encouraging the sustainable use of land and other natural resources in town and country.

A303, and has insisted that Highways England must review their portfolio of road enhancement projects to improve value for money.

**We would also like to make the following, specific points:**

- Option 2 is completely unacceptable to CPRE as it will mean the destruction of an unspoilt valley and would take up approx. 25 hectares of good quality, sensitively managed farmland. The new road would run close to four rural wildlife sites and ancient woodland and would cut through registered parkland in this unpopulated unspoilt valley. It would bisect and disrupt several Public Rights of Way. Option 2 would also dramatically increase levels of noise and light pollution in this tranquil, open landscape.
- Option 1 is also unacceptable to us for the reasons stated earlier. As well as our fundamental objection to the principle of road building, there are many unanswered questions about the proximity of the road to existing homes, how much land will be taken up, what the junction layouts will be - and what, if any, economic impact there will be for this part of Somerset. “Soft” tourism in the form of appreciation of landscape, tranquillity, heritage and culture is an important part of the local economy and is not fully quantified in any of the supporting documents behind the road proposal. The historic, cultural and natural environment plays a key role in the local and wider, regional economy, bringing in valuable business from the UK and abroad, supporting local small enterprises in this rural area as well as the adjacent urban areas such as Yeovil and Sherborne.
- CPRE is aware that some feel that Option 2 is preferable to Option 1 as it will enable the construction work to be carried out without major disruption to motorists. CPRE rejects this approach. We all have a responsibility to think longer term and take some responsibility for how future generations will view the decisions we make. Sparkford Vale has been managed by farmers for generations. Are we really going to destroy this just because we can't bear the thought of a few minutes extra journey time for a few months?
- From our experience and knowledge of the sub region, and from a careful study of both Google's congestion maps as well as Highways England's own figures, the road plays a rather more local role than purely as an end-to-end expressway. The subtle and vital connections into local towns and smaller communities will be irreversibly changed by this proposal yet no appraisal of these has been made as part of the overall planning process.
- In our view the evaluation made of the economic advantages of turning the A303 into an expressway (A303/358/30 Corridor Improvement Programme Economic impact study Feb 2013) is not sufficiently rigorous or inclusive. This study is light on local information and is in considerable disagreement in its final analysis with the more thorough “London to South West and South Wales Multi Modal Study” report carried out by Halcrow Group Ltd for the Government Office for the South West in 2001.
- The figures presented by Highways England at the last of the Taunton consultation meetings, but not made public as yet, predict that the traffic on the road will grow between 25% and 55%. The impact on South Somerset, its landscape and its communities in the light of these predicted figures has not been assessed and not been explained fully to local consultees. We believe that this error must be urgently rectified.

In CPRE Somerset's view, both options are unacceptable but, if there is to be a widening scheme at Sparkford, then Option 1 is very much preferable as it causes less damage to the countryside. Fundamentally, however, we believe that connectivity for the South West could be achieved in far less damaging and intrusive ways. There remains the desire for a robust railway link from Waterloo to Exeter and beyond via Basingstoke. Improved internet services would dramatically improve the business viability of the rural areas of the South West. Any money allocated to this scheme should be spent on repairing potholes, public transport, and harnessing new technology to make more efficient use of existing road space.

We hope you will take our views into account.

Yours faithfully

A handwritten signature in black ink, appearing to read "Becky Collier", is centered within a light green rectangular background.

Becky Collier - Branch Manager

# Cary Moor Parish Council

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(Incorporating the villages of Alford, Lovington, North and South Barrow)

Clerk: Mrs Liz Eaton, Sutton Dene, Torbay Road, Castle Cary, Somerset, BA7 7DW. Tel: 01963 350536

E-Mail: [ejmeaton@gmail.com](mailto:ejmeaton@gmail.com)

28 March 2017

By email to: [A303SparkfordtoIlchesterDualling@highwaysengland.co.uk](mailto:A303SparkfordtoIlchesterDualling@highwaysengland.co.uk)

Dear Sirs

## **A303 Sparkford to Ilchester Dualling Scheme Public Consultation – Response of Cary Moor Parish Council**

Cary Moor Parish Council includes the village of South Barrow the southern boundary of which borders the northern boundary of Hazelgrove House Registered Park and Gardens extending in a westerly direction into the Sparkford Vale adjacent to the parishes of Sparkford and Babcary. Hence Cary Moor Parish Council represents the interests of residents directly affected by Option 2. The Parish Council considered this matter at its meeting on 21 March and, in fully recognising the need for this road improvement scheme, unanimously supported Option 1 for the following reasons.

Option 1 follows the general direction and alignment of the existing single carriageway. Hence dualling it would involve minimal change to the existing environment; just 'more of the same' one might say. Option 2 on the other hand, would drive straight across that part of the Sparkford Vale to the North of the present road, destroying an area of natural beauty which includes four farms and affecting the Hazelgrove House Registered Park and Gardens to a much greater degree than Option 1. The view of the Sparkford Vale from the villages of Babcary and South Barrow would be ruined forever, to say nothing of the noise and light pollution and increased liability to flooding, resulting from the high water table in the area.

Hence we would urge Highways England to reject Option 2 in favour of Option 1 and look forward to receiving confirmation accordingly at the earliest possible opportunity to allay the fears and concerns that this ill conceived and deeply damaging proposal has engendered in our local community and beyond.

Yours faithfully

Mrs Liz Eaton  
Clerk to Cary Moor Parish Council





A303 Sparkford to Ilchester Project Team  
Highways England  
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2 The Square  
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BRISTOL  
BS1 6HA

28 March 2017

Dear Sirs

## **A303 SPARKFORD TO ILCHESTER DUALLING SCHEME**

### **Introduction**

The CLA is the membership organisation for owners of land, property and businesses in rural England and Wales. We speak for everyone who believes in a living and working countryside. Through the experience and expertise of our 30,000 members and staff, we seek to ensure the positive development of the rural economy.

We support the Highways England proposal to make significant improvements to the important A303 route through the counties of Wiltshire and Somerset. You will understand that whilst we can and do on occasion support the principle of major development projects, our major concerns relate to the protection and representation of members' property rights and interests, for instance in relation to valuation and compulsory purchase. The question of route selection is often one on which different members' interests and opinions conflict and therefore it would be highly unusual for us to seek to express views relating to route selection.

It is therefore significant that on this occasion we write to lodge our objection to Option 2 as set out in your consultation for the A303 Sparkford to Ilchester Dualling Scheme.

### **Background**

Improving this stretch of the A303 is, of course, not a new idea. Similar proposals were brought forward for consideration in 1993 and were the subject of a public inquiry in 1994. You will be familiar with the outcome of that inquiry and the reasoning of the Inspector in reaching his decision to favour the route that broadly followed the existing alignment of the A303. Suffice to say here that the Inspector found against the northerly route alignment, very similar if not identical to the Option 2 alternative set out in the current consultation, on the

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grounds of landscape, visual, ecological and environmental impact together with, in his view, the unnecessary and negative impacts caused by the severance of agricultural holdings and footpaths. In summary, he found that departing from the existing A303 corridor into the unspoilt, undisturbed, quiet and quintessentially rural Sparkford Vale was unjustified.

Nothing has changed that should lead the current consideration of routing options to reach a different conclusion.

### **Technical evaluation**

The technical evaluation indicates that whilst Option 1 exhibits higher Present Value Costs, it also exhibits higher Net Present Value.

However, we have seen nothing in the evaluation relating to land acquisition costs. We understand that elements of the Option 1 route may already have been the subject of compulsory purchase and a significant percentage of the Option 1 route lies directly on line with the current corridor. By contrast, the entirety of the Option 2 route would be subject to acquisition and compensation costs, which in our opinion would be considerable and material to the overall cost comparison between the two options. Whatever they might turn out to be, it seems clear to us that land acquisition and compensation costs will be significantly higher for Option 2 than for Option 1 which will give further NPV benefits to Option 1, giving added weight to the conclusion that this should be the preferred route.

We are also concerned that at this stage of the evaluation the requirements for engineered structures to address severance and access issues can at best only be approximations and note that, to our knowledge, there have not yet been discussions with affected landowners as to the impact of, and the mitigation measures (including the quantum of compensation) required to address, severance issues.

We note that Benefit Cost Ratios show only a marginal difference between Option 1 and Option 2 but would expect that difference to close further, if not switch round, to place the BCR and ABCR of Option 1 ahead of Option 2 when the considerations referred to above and subsequently are taken into full account.

Marginal benefits are claimed for Option 2 over Option 1 in relation to road safety. We acknowledge the importance of road safety but would observe that, whilst hard design is part of the consideration, Highways England also has options at its disposal in relation to mandatory traffic management systems and driver awareness and advisory measures to deliver higher standards of road safety.

The consultation also suggests a benefit of Option 2 as being that the existing route would remain as a relief road. We consider this to be an unsustainable concept and certainly not one that should weigh significantly in the balance between the two options. If applied across the length of the A303, the logical outcome would be to realign many parts, if not the entirety, of the route.

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## **Environmental evaluation**

The consultation documents clearly indicate that Option 1 is superior, and should be the preferred alternative in terms of having a lower environmental impact.

### Landscape

The evaluation concludes that the landscape impact of Option 2 would be largely adverse compared to Option 1 which is considered moderately adverse. Clearly, choosing a route that cuts through a hitherto unspoilt but highly visible landscape will have a severe landscape impact and no viable mitigation measures could address the negative impact. Selection of Option 1 would conflict with National Policy Statements for National Networks (section 5.149) relating to the requirement to take account of landscape considerations and to avoid or minimise harm to the landscape.

### Historic Environment

The consultation rates each alternative as being moderately adverse, but in our opinion the balance in terms of protecting the historic environment clearly should favour Option 1 as being the preferred route.

Option 1, which follows the existing corridor, has no additional impact beyond that which currently exists, with the exception that both schemes would impact on Hazelgrove Park. The existing corridor already sits in its context within the historic environment and Option 1 will not change that.

By contrast, there are several Scheduled Monuments in the Vale of Sparkford including the moated site at Coages Park and the earthworks of the Saxon settlement at Downend. The context of Parsons Steeple and Yarcombe Wood ancient semi-natural woodlands would be significantly changed. Furthermore, whilst the historic environment of the existing A303 corridor has been well investigated and researched, much of the Sparkford Vale is not and it is regarded as an Area of High Archaeological Potential.

### Biodiversity

The consultation summary rates Option 2 as having a moderately adverse biodiversity impact compared to Option 1 which is considered to have a slightly adverse impact.

We would expect that Highways England does not yet have a sufficiently detailed appraisal of the existing biodiversity of the area potentially affected by Option 2. Much work has been done in recent years by land managers operating under various agri-environment schemes and by FWAG, which we understand has also written to object to Option 2. Option 2 will have severe and significant impacts, for example the severance of linear hedges which provide wildlife corridors that cannot easily be replaced.

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Furthermore, the requirement for a cutting at the western end of the scheme will potentially have a significant impact on Annis Hill Wood.

In our opinion, giving the unspoilt nature of the Sparkford Vale and the considerable conservation efforts of local landowners over the past two decades, we believe that the balance of probability is that the consultation documents significantly underestimate the potential biodiversity impact of Option 2 but note nonetheless that HE has concluded that the impacts of Option 2 are greater than those of Option 1.

### Water

We note that the consultation documentation considers the impact on the water environment to be approximately similar rating each option as having slightly adverse impacts. We find this surprising, given that water impacts and management within the existing A303 corridor are known and mitigation and management measures established and understood whereas in the case of Option 2, they are not..

Given the low lying nature of the land on the Option 2 route, its proximity to Flood Zone 3/2 Dyke Brook , we suspect that in reality water management and flood mitigation measures may prove more challenging and costly than currently anticipated. Clearly, more will be understood once detailed hydrology and hydro-geological investigations have taken place. There are no indications that current assumptions are based on such detailed investigations.

### Severance

It is accepted that major road schemes result to a greater or lesser extent in severance issues. However, in our view, adherence so far as practicable to the existing corridor will minimise the occurrence of new severance consequences.

The consultation assessments consider the impacts of each option to be similar however, given that Option 2 is an entirely new route, it seems highly likely that in reality highway, PROW and natural corridor severances will be more significant under Option 2 proposals. Furthermore, due account should be taken of the significant consequences for the landowners of the severance of their landholdings with the attendant impacts on their business enterprises.

### Environmental pollution

We note that the greater impact of greenhouse gas emissions arising because of the longer route of Option 2, has been monetised in the financial appraisal. However, Option 1 is more environmentally efficient and it seems counter intuitive to propose a new and longer route which not only creates greater vehicle emissions but also, as addressed above, creates great biodiversity, landscape and historic environment impacts.

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## Conclusion

We have considered carefully both the proposed options and strongly conclude that Option 1 should be the preferred alternative.

We have reached this conclusion based on the financial, technical and environmental information provided in the consultation document. We believe that the NPV of Option 1, which currently indicates Option 1 as being the stronger option, will be further increased when full account of acquisition and compensation costs are included.

Option 2 is clearly more environmentally damaging and we believe will be shown to be even more so when detailed evaluations of impacts have taken place.

Therefore, we urge Highways England to have due regard to the decision reached in 1994 and to our views expressed here and accordingly to reject Option 2, choosing instead to remain within the existing corridor of the A303, as set out in Option 1.

Yours faithfully

A handwritten signature in black ink, appearing to read 'John Mortimer', is written in a cursive style.

John Mortimer

Director CLA South West

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27 March 2017

### **A303 Sparkford to Ilchester Public Consultation**

The Heart of the South West Local Enterprise Partnership welcomes the opportunity to respond to this consultation on upgrading the Sparkford to Ilchester section of the A303.

#### **Principle of the Proposal**

The Local Enterprise Partnership strongly supports the objective outlined in the consultation document, to reduce congestion and improve safety through providing a dual carriageway to replace the single carriageway section between Sparkford and Ilchester.

As members of the partnership of Local Enterprise Partnerships and Local Authorities which includes Dorset and Swindon and Wiltshire LEPS, and the Councils of Devon, Somerset, Dorset and Wiltshire, we are pleased that the Government is following through on its commitments within the Road Investment Strategy. These include upgrading all remaining sections of the A303 between the M3 and the A358 to dual carriageway standard, together with creating a dual carriageway link from M5 at Taunton to the A303, as part of a long-term commitment to creating a new Expressway to the South West. The Government has also committed to set aside funding for smaller-scale improvements to the A303/A30 section between Southfields and Honiton to improve safety and journey quality for road users.

These investments are vitally important to the UK and South West economy as demonstrated by our independent economic assessment, validated by DfT, which demonstrates that improving the whole A303/A30/A358 corridor would:

- create 21,400 jobs and deliver a £41.6bn boost to the economy
- deliver £21.2bn of taxation, welfare savings, disposable income and tourism benefits;
- create £1.9bn in transport benefits from reduced journey times and greater resilience;
- save 1807 fatal or serious casualties;
- reduce carbon emissions by 9%

In our view it is vital that the Government delivers these improvements on the ground at the earliest opportunity, and that the detailed design of the schemes is such that the full potential of the improvements in delivering economic growth and productivity benefits for the region and the UK can be realised.

The partnership's desire is for the improvement scheme to maximise both the transport economic benefits and safety benefits by gaining the greatest possible reduction in journey times and collisions; providing free-flow junctions at strategic points of access to other key road links; and ensuring there are good strategic connections with economic growth centres to maximise the wider economic benefits of the scheme for business productivity.

The economic assessment produced by the Steering Group demonstrates that the full economic benefit of the improvements can only be achieved by providing an 'end-to-end' dual carriageway standard route linking the M3 with the M5 and urges the Government to provide sufficient resource within the road investment strategy to deliver this outcome.

## **Creating opportunities in Devon, Plymouth, Somerset and Torbay**

Mobile: 07817 497135 email: [chris.garcia@heartofswlep.co.uk](mailto:chris.garcia@heartofswlep.co.uk)

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The Sparkford to Ilchester scheme, along with the other schemes currently being progressed at Stonehenge and Ilminster to M5 at Taunton, are vital first steps towards achieving a whole route improvement, and as such are strongly supported.

### Detailed Route Options

The Heart of the South West Local Enterprise Partnership does not have a fixed view on whether the on line route or the off line route should be chosen.

However, we would stress:-

- the importance of creating a free flowing route with grade separation of new junctions
- the desirability of reducing the number of junctions
- the need to consider alternative future provision for cyclists and agricultural vehicles to enable the route to be of expressway standard.

Yours sincerely,



Chris Garcia  
Chief Executive





Historic England

SOUTH WEST OFFICE

Mr David Stock  
Highways England  
2/07K Temple Quay House  
2 The Square  
Temple Quay  
Bristol  
BS1 6HA

Direct Dial: 0117 9750699

Our ref: PL00069502

29 March 2017

Dear Mr Stock

**A303 Sparkford to Ilchester improvement - non-statutory public consultation on shortlisted options**

Thank you for consulting Historic England at an early stage in the development of proposals. Prior to this public consultation exercise we have been involved in the scheme via attendance at a series of Value Management Workshops which informed the selection of the options now in consultation. We have also been involved in site visits to designated heritage assets potentially affected by the road improvement. The most recent site visit was on 15th March 2017 when I visited Hazelgrove House Registered Park and Garden together with our Landscape Architect, Kim Auston.

**Role of Historic England**

We are the government's expert advisor on England's heritage and we have a statutory role in the planning system. Central to our role is the advice we give to local planning authorities, government departments, developers and owners on development proposals affecting the historic environment.

'Constructive Conservation' expresses the role we play in promoting a positive and collaborative approach to conservation that focuses on actively managing change. The aim is to accommodate the changes necessary to ensure the continued use and enjoyment of heritage assets while recognising and reinforcing their historic significance. Our advice seeks to minimise the loss of significance to these assets. We also look for opportunities to enhance the historic environment.

Our remit in relation to this proposed road improvement is the protection of the Scheduled Monuments No 1020936 *Romano-British Settlement Immediately South West of Camel Hill Farm* (hereafter referred to as "the Roman settlement") and No 1021260 *Medieval Settlement Remains 100m and 250m North of Downhead Manor Farm* (hereafter referred to as "the Medieval settlement") together with their settings. Although we normally restrict our advice on Registered Parks & Gardens to Grade I and Grade II\* sites, in this case we are advising on the potential impacts upon the



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Grade II Registered Park & Garden (RPaG) No 1000422 *Hazelgrove House* due to the potential severity of the impact of the new road, whichever option is selected.

### **Scheduled Monuments**

It would appear, from the information available within the consultation documents, that neither option would directly impact upon either of the Scheduled Monuments. However, Option 1 runs close to the southern edge of the Roman settlement and we would wish to be assured that any new land-take necessary to construct the road improvement took place on the south side of the current road, away from the monument. We also note the potential for additional archaeological remains of this settlement beyond the scheduled area, as noted in the scheduling description. If identified during archaeological assessment and evaluation work to inform the road improvement, these may be considered to be of equivalent significance to the scheduled remains.

Option 2 avoids the Roman settlement but runs to the north of the Downhead Medieval settlement. Whilst not directly impacted, there remains the potential for a significant impact upon the setting of this monument. Unlike the Roman settlement which contains no earthwork remains, the Medieval settlement has some well-preserved archaeological earthworks which makes it readily legible to visitors. We recommend that a robust and thorough setting assessment is brought forward at an early stage in the further development of proposals to characterise the potential impact of Option 2 upon this monument.

### **Registered Park and Garden (RPaG) at Hazelgrove House**

#### ***Initial view on level of impact***

From our recent site visit to the RPaG it was possible to surmise that whichever route option was identified as preferred, it would lead to direct impacts to approximately 30% of the designated area. This would essentially be lost by the development of new junctions and new sections of dual carriageway, together with associated earthworks necessary to deal with the topography.

With reference to the National Planning Policy Framework it is clear that either option would lead to 'substantial harm' to this heritage asset. In relation to Grade II heritage assets NPPF para 132 states that 'Substantial harm to or loss of a grade II listed building, park or garden should be exceptional'.

#### ***Understanding the significance of the heritage asset***

Paragraph 128 of NPPF requires applicants 'to describe the significance of any heritage assets affected, including any contribution made by their setting'. As far as we are aware the history of Hazelgrove House's designed landscape has never been





systematically researched. The description of the RPaG in the National Heritage List for England is effectively a summary and we need this to be amplified in order to understand issues such as phasing, values and significance. Allied to this - and sometimes overlooked - is an evaluation of how the design of the park actually worked. This will include, but not be limited to: consideration of drives, rides and approaches; the contrast between openness and enclosure; what is revealed and what is hidden; designed views; and the borrowed landscape. While the NPPF rightly states that the level of detail an applicant submits should be 'proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance', **in this case the potential harm is so great that the highest level of detail will be required.**

This will not only assist Historic England in its own evaluation of the development proposal but should be an invaluable tool to Highways England in guiding mitigation proposals, in line with NPPF paragraph 129, 'to avoid or minimise conflict between the heritage's conservation and any aspect of the proposal'.

### ***Testing the proposed route options against the significance of the heritage asset***

This is crucial to our evaluation of the proposals and is something we would expect Highways England to undertake as part of their Heritage Impact Assessment. Although this is often presented in the form of a matrix deriving from the EIA methodology with 'degree of impact' set against 'sensitivity of receptor', we tend to find this approach rather dry and formulaic. We would rather the significance of the heritage asset (some significances will be localised such as ridge and furrow earthworks and some, by contrast, will transcend several zones such as a view of a borrowed landscape) to be presented as a simple narrative, supported by illustrations.

### ***Mitigation***

As noted above, mitigation is one of the key ways in which the applicant can 'minimise conflict between the heritage asset's conservation and any aspect of the proposal'. Mitigation should begin with the drawing up of a Conservation Management Plan (CMP) for the RPaG. Given the degree of harm likely to arise from this particular development we are keen to see a CMP delivered at the beginning of the process. The objective of a CMP should be to consider how best to conserve (what remains of) the park, and retain its significance. This is likely to include policies for succession planting, preservation of earthworks, screen or baffle planting of intrusive development, land use (e.g. the on-going farming operation in the park), reopening of historic views, interpretation and public access.

### ***Public benefit***





SOUTH WEST OFFICE

Given the degree of harm the scheme will cause to the RPaG, we need to see the argument set out clearly and convincingly, as per paragraph 133 of the NPPF, that the 'substantial harm or loss [the loss of a substantial part of the grade II registered park] is necessary to achieve substantial public benefits that outweigh that harm or loss'. We expect that any expression of potential "substantial public benefits" will include not only references to the traffic and economic improvements the road scheme might deliver, but also how such benefits might be delivered to the surviving portion of the RPaG.

**Historic England preliminary view on Options**

From the information available it appears clear that, notwithstanding the major impact upon the RPaG from either option, the partially on-line Option 1 might avoid a significant adverse impact upon the setting of the Downhead Medieval settlement, provided that there is no impact upon the Roman settlement site, and any significant archaeological remains that might be associated with it beyond the present scheduling constraints.

We are aware that Highways England have consulted Somerset County Council's archaeological advisers at SW Heritage Trust, as well as the county Conservation Officer and relevant departments at South Somerset District Council. The advice of these specialists should be given due weight by Highways England in considering further work towards the selection of a preferred option.

We are keen to remain engaged with the development of the preferred option in due course, so that this road improvement is delivered with minimum harm and maximum benefit to the historic environment. Please don't hesitate to contact me if you require any further information or clarification of the advice given in this letter.

Yours sincerely,

Phil McMahon  
Inspector of Ancient Monuments  
phil.mcmahon@HistoricEngland.org.uk

cc: Kim Auston, Landscape Architect, Historic England  
Bob Croft, South West Heritage Trust, archaeological advisers to Somerset County Council





# ILCHESTER PARISH COUNCIL

*The Ancient Roman Town of Lindiniæ*

*Clerk to the Council  
Philip Horsington  
Broadleeze Farm  
Tintinhull  
YEOVIL BA22 8PF*

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**Email: pthorsey@aol.com**

**March 20<sup>th</sup> 2017.**

## **Sparkford to Ilchester Dualling Scheme - A.303.**

Dear Sirs,

Following a meeting of the Parish Council held on Thursday March 9th last, I have been instructed to write to inform yourselves that Ilchester Parish Council agreed unanimously, to support Option 2 the new northern route proposals.

The Council's reasons were that the existing A.303 can remain as a filter road, with access to the B.3151 which would alleviate local traffic volume, which will benefit local residents. This is based on the fact that RNAS Yeovilton is adjacent to the Parish with its Service personnel, who have to get to their place of employment.

There is an Annual Air day attracting 35,000 visitors & if the B.3151 is closed by Wayne's Bistro to access onto the A.303. as in Option 1, the impact on Ilchester & the adjacent villages will be considerable.

There is a need to maintain access onto & from the A.303 both at the Podimore & Sparkford ends to allow businesses and local traffic to use the A.303.

Yours Sincerely,

P.T. Horsington, Clerk.

Highways England  
A.303 Sparkford to Ilchester Project Team  
2/07k Temple Quay House  
2, The Square  
Temple Quay  
Bristol  
BS1 6HA.



# KING'S BRUTON

*Deo Juvante*

24 March 2017

FROM: THE BURSAR

Mr Louis Tuson MBE

A303 Sparkford to Ilchester Project Team  
Highways England,  
2/07k Temple Quay House  
2 The Square  
Temple Quay  
Bristol  
BS1 6HA

## A303 Sparkford to Ilchester Scheme – Hazlegrove Preparatory School Comments

This letter constitutes the response of King's School, Bruton to the Highways England consultation on the proposed A303 upgrade between Sparkford and Ilchester. King's School, Bruton is a registered Charity (Charity number 1071997) which owns and operates a senior school in Bruton and Hazlegrove Preparatory School. Hazlegrove School is one of the larger properties that will be affected by the proposed upgrade and is an Independent Boarding and Day school for pupils aged 2 to 13 centred on Hazlegrove House, a listed property.

The School fully supports the proposed improvements to the A303. The upgrade provides an opportunity to reduce congestion, and improve safety coming onto the A303 from the Hazlegrove exit which can be extremely dangerous, particularly in the Summer months when traffic volumes and speeds on the roundabout are high. The School has over 250 day pupils, who together with staff use the A303 each day. The upgrade to the West will significantly reduce journey times for pupils coming to school.

The School strongly supports Option 1. Although Option 1 has disadvantages to the School particularly during the construction phase when there is likely to be congestion for School traffic and inconvenience for parents, pupils and staff, this is insignificant when compared to Option 2 which pushes a new route through virgin countryside. The School could not support Option 2 with its far greater impact on the environment.

The School has a particular concern over the construction phase of Option 1. In general parents are prepared to spend a maximum of about 30 minutes taking their child to a day school. If the construction were to result in delays to traffic travelling Eastbound to the Sparkford roundabout over a number of years, this could have a direct impact on parents selecting Hazlegrove as the School for their children and could affect the income of the School. This must be taken into account when designing any temporary schemes to divert traffic in Option 1.

The School has a particular interest in ensuring the most efficient movement of traffic from the School drive onto the A303 both East and Westbound, whether this be direct or via the existing roundabout. As a School with fixed pick up and drop off times, there is a surge of heavy traffic for relatively short periods of the day. Drop off is concentrated to only 20 minutes or so up to 0815, whereas pick-up tends to be spread from 1630 onwards, these occur daily including Saturdays. There are also particular days in the year when there is particularly heavy traffic over a very short period, for example at the end of Terms. It is essential that when traffic surveys are carried out

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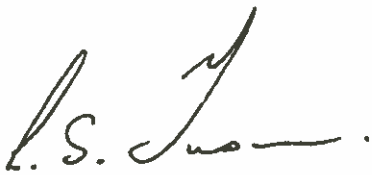
to support the design of the entrance and exit routes to the School drive, they take account of these extremes of flow, as well as the routine.

The front drive is currently the only vehicle access route to Hazlegrove and it is therefore essential that it is maintained for routine and emergency access throughout the construction phase.

The location of the Option 1 and Option 2 routes which cut across the southern end of the Hazlegrove drive are difficult to locate exactly on the ground, although it would appear that Option 2 comes closer to the house. There is a concern that the route will create both noise and light pollution that will affect the School. The School is a boarding school with pupils aged 7 – 13 sleeping in accommodation including rooms at first and second floor level in the main house. The main house itself is listed and therefore has limited sound insulation through the original sash windows. Therefore noise is a concern which needs to be considered and mitigated in the design if necessary. Similarly if the angle of approach of the route results in vehicles shining headlights towards the house, mitigation would be necessary.

Once the construction is complete, it is understood that Highways England may dispose of surplus fields adjacent to Hazlegrove House that it currently owns. The School would like to register its interest in the purchase of such property if it were to become an option.

Yours sincerely

A handwritten signature in black ink, appearing to read 'L. S. Tuson'.

Louis Tuson  
Bursar



**National  
Trust**

ian.wilson@nationaltrust.org.uk  
Direct line: 07795 301138

Your ref: A303 Sparkford to Ilchester Dualling Scheme  
Our ref: A303 Sparkford Consultation Mar.'17

24<sup>th</sup> March 2017

A303 Sparkford to Ilchester Project Team  
Highways England  
2/07k Temple Quay House  
2 The Square  
Temple Quay  
Bristol  
BS1 6HA

Dear Sir/Madam

**A303 SPARKFORD TO ILCHESTER  
Proposed road improvement**

Thank you for the opportunity to respond to the Highways England consultation on the proposed A303 Sparkford to Ilchester road improvement.

The National Trust is Europe's largest conservation charity with nearly five million members. Established over 115 years ago, our primary purpose is to promote the preservation of special places for the benefit of the nation. To achieve this aim we own and manage places of historic interest and natural beauty and have become the UK's largest private landowner. In South West England, this includes over 57,000 hectares of countryside, over 1300 listed buildings and nearly 300 miles (19%) of the coastline. Given the range of our activities, we are in a position to comment both from the perspective of a landowner and as a major conservation organisation responsible for safeguarding the nation's natural and historic assets.

Within our South Somerset portfolio, we own and care for Lytes Cary Manor, a typical Somerset manor house that is a designated heritage asset by virtue of its grade I listed status. The property has a registered park and garden and tenanted farmland comprising some 148 hectares in total. Lytes Cary and its estate lie close to the A303 Podimore roundabout as shown on the enclosed map. Our portfolio also includes Montacute House and estate (within which lies St Michael's Hill), Barrington Court and Tintinhull House and Garden, all of which are accessed by visitors using the A303.

The Trust has been an active stakeholder engaging with Highways England, Historic England and others regarding proposals for improvements to the whole A303/A358/A30 corridor. We are aware of the longstanding challenges of highway access to the South West

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Registered charity number 205846

via this corridor and the important benefits for local communities, visitors and the wider economy that could arise from road improvements.

In response to the current consultation, we appreciate that the 5.5km stretch of single carriageway between Sparkford (Hazelgrove junction) and Ilchester (Podimore junction) needs upgrading and we support the principle of a new dual carriageway link. As well as improving access to the South West more generally, this would reduce delays and traffic congestion, especially during peak times and the busier summer months. In respect of the proposed route options, we note that according to Highways England assessment work carried out to date, option 1 (A2 online route) would perform better regarding landscape and the historic environment as it would be partly contained within the existing road corridor. Option 2 (F1 northern route) would have a greater impact on the landscape and biodiversity, but may be better for network resilience as the existing road could be retained. We do not intend to express a particular route preference; instead we have made a range of comments under the headings below.

### **General principles**

In accordance with the Highways England document '*Creating an Expressway to the South West – The Case for the A303/A358 Corridor*' (2016), we would expect to see sensitive design and engineering to help reduce potential impacts and provide adequate mitigation to enhance the landscape. The dual carriageway solution should therefore comprise the best possible solution for the landscape which avoids, minimises or mitigates impacts on the natural and historic environments and pays attention to the local character and appearance and sense of place. Where possible, opportunities should be taken to enhance landscape character, ecological interests and public access to the countryside.

### **Landscape, visual and heritage impacts**

We note that option 2 would impact on the undeveloped countryside and ancient woodland sites to the north of Camel Hill, whilst option 1 would be more elevated in places and could therefore be visible from further afield. From our perspective, we would ask that the potential impacts of both options on the views and setting of Lytes Cary are carefully considered. There are eastward views adjacent to the garden at Lytes Cary, where there is permissive public access to the woodland trail from Ridgeway Lane (public right of way) and from our tenanted farmland. As viewed from Lytes Cary, option 2 may be more visible than option 1. In particular, large moving vehicles, vehicle lights and any street lighting may be visible within the landscape. Should option 1 have a junction on the south-west side of Camel Hill, this may be very visible within the wider landscape, possibly from as far away as St Michael's Hill; it should be considered whether this junction is necessary and how its potential impacts could be reduced. More generally, there may be scope for mitigation by use of earth bunds and tree planting, as long as this accords with the local landscape character.

In addition to the above, we are aware that both route options are likely to have an adverse impact on the registered park and garden at Hazelgrove House and local wildlife site within the grounds, in terms of potential noise and visual impacts and reduction in the size of the parkland. Such impacts are of particular concern and we would ask Highways England to explore ways in which they can be avoided, reduced or mitigated as much as possible. The



same concern and request apply to other designated heritage assets along the proposed routes which we have not focused on in our response as we would expect this to be covered in the response from Historic England.

### **Other impacts and opportunities**

We would ask Highways England to ensure that the potential impacts on ecological interests are fully understood and are minimised wherever possible. Where impacts are unavoidable, then adequate mitigation must be carried out. This applies in respect of the choice of route option, the detailed design and during the construction phase. Whilst we note that the proposed route options would not directly affect any national or international designated nature conservation sites, there may be impacts on protected species such as bats, barn owls, badgers, as well as breeding birds in addition to permanent loss of habitats in both options as mentioned in the Technical Appraisal report, Section 9.7. Option 2 would also affect the Annis Hill local wildlife site, so should this route be chosen measures must be taken to reduce the potential impacts. We are pleased to see that attention has been given to habitats and species of conservation importance in section 4.2.1 of the Technical Appraisal report and we would advocate that Highways England and its partners explore opportunities for ecological enhancement in accordance with the “more, bigger, better and joined up” approach to wildlife sites recommended in the “Making Space for Nature” report by Professor Sir John Lawton.

One of the objectives of the road improvement is to “improve motorised and non-motorised accessibility for local communities” and we would encourage the creation of good access links and routes for walkers, cyclists and horse riders, whichever route option is taken. This would include provision of under- or over-bridges as appropriate, allowing local residents and visitors to explore the local countryside and support active lifestyles.

In respect of the construction process itself, the location of the construction compound and routes for construction vehicles should be carefully considered, to ensure minimal impact to the landscape, heritage assets and local communities and we would welcome the opportunity to discuss this once the preferred route is chosen.

### **Implications for road users and business continuity**

The proposed road improvement, in addition to other schemes along the A303/A358 corridor, will inevitably affect road users during its construction phase, including local residents and businesses, as well as visitors to the South West. Going forward, we would ask Highways England to consider how these affects can be minimised as much as possible, with advanced, clear information to businesses and visitor attractions in terms of the timing of works and the diversion routes. Currently, as outlined in the Technical Appraisal Report, section 8.2.3 the diversion routes being considered include an additional 10mile northern route and a 35mile southern route. We are concerned for the additional journey delay this will cause to our visitors and for both the local businesses and community. We would therefore appreciate the opportunity to discuss the implications for business continuity at the appropriate time.

## **Future proposals**

We are aware that the Department for Transport has committed to the South West Expressway over the next twelve years, including planned grade separated junctions at Podimore and Cartgate. The works at these junctions will have significant impact on the natural and historic environments, including on views from Lytes Cary and St Michael's Hill. Any review of this impact from National Trust will be independent of our response to this consultation and we would welcome continued active stakeholder engagement with Highways England when these projects become live.

## **Conclusion**

In conclusion, this letter represents the National Trust's initial response to the proposed road improvement. Our view on proposals for new or enhanced transport infrastructure is guided by our statutory purpose which, in broad terms, seeks to protect special places for ever for everyone and the design of both new and existing infrastructure needs to be of high design quality, respecting its setting and the spirit of the place where it is located.

We agree that the A303 from Sparkford to Ilchester needs upgrading in the form of a new section of dual carriageway but we strongly advocate the need for a sensitively designed scheme that minimises its impacts on the natural and historic environments. In particular, we would ask that potential impacts on the views and setting of Lytes Cary and its estate (and St Michael's Hill) are fully considered and that potential environmental enhancements along the route options are fully explored. We look forward to engaging further with Highways England, its consultants and other stakeholders as the design of the scheme is progressed and to review the details of the preferred route at the next stage of the consultation where we will be more fully informed to review the impact of the preferred scheme on the landscape.

Yours faithfully,



Ian Wilson  
Assistant Director Operations

Date: 28 March 2017  
Our ref: 210413



Highways England

**BY EMAIL ONLY**

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Dear Sir/Madam

**Planning consultation:** Public Consultation - A303 Sparkford to Ilchester Road Dualling Route Options

Thank you for the opportunity to comment on the current proposals for the above scheme.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

### **Summary**

Natural England broadly agrees with the environmental issues identified in the Technical Appraisal Report. For the reasons outlined below, based on the information available at this stage, Natural England advises that Option 1 is likely to result in fewer adverse effects on biodiversity and landscape than Option 2.

### **Statutory nature conservation sites and protected landscapes**

Neither route option is within an Impact Risk Zone (IRZ) for statutory nature conservation sites or protected landscapes, so we do not expect the proposals to result in a significant effect on such sites.

### **Biodiversity**

Based on the information available at this stage, Option 2 is likely to result in a more significant impact on biodiversity than Option 1. It intersects Annis Hill Local Wildlife Site which comprises Ancient Woodland, a priority habitat under the UK Biodiversity Action Plan (BAP). We would highlight paragraph 118 in the National Planning Policy Framework which states that there should be a presumption against authorising development resulting in the loss of irreplaceable habitats including ancient woodland.

However it should be noted that our records show that an area of Lowland Calcareous Grassland, also a BAP Habitat is adjacent to the existing A303 and therefore in very close proximity to Option 1. The Technical Appraisal Report acknowledges this habitat is in the area but does not suggest that this might be affected by Option 1. For clarity, we would advise that the potential for effects on this habitat and any necessary mitigation should be considered in future scheme documents.

The Technical Appraisal Report acknowledges the potential for both scheme options to affect protected species and it is therefore possible that licences will be required. Natural England guidance with regard to licensing for Nationally Significant Infrastructure Projects can be found [here](#). Due to Option 2's "off-line" nature, we agree with the report's conclusion that there is more risk of Option 2 fragmenting ecological networks and therefore being more likely to result in a large adverse effect than Option 1.

As part of the scheme we would welcome the enhancement of existing habitat where possible and creation of new habitat where current areas are lost through the scheme, we would wish to see plans which seek to achieve a net increase in biodiversity. Linear routes help to provide habitat connectivity throughout the landscape which is beneficial to both people for visual screening/noise reduction and wildlife.

### **Local Landscape**

Given the nature of the scheme, both route options will have impacts on the local landscape. However Option 2 cuts through a significant amount of open rural land. As the Technical Report notes this would likely result in a more significant adverse effect than Option 1.

### **Other environmental considerations**

We are also aware that there are a number of agri-environment schemes in close proximity to both options. A number of Higher Level Stewardship holdings which have been managed for conservation purposes will likely be affected and it is expected that Option 2 in particular will affect these holdings.

We would be happy to provide further advice regarding enhancement opportunities and other issues relating to biodiversity and landscape through our Discretionary Advice Service, further details of which can be found [here](#).

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us. For any queries relating to the specific advice in this letter only please contact me using the details at the bottom of this letter. For any new consultations, or to provide further information on this consultation please send your correspondences to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk)

Yours sincerely

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Your ref:

Our ref: NFU/Response/A303March  
2017

Email: [Matthew.Uren@nfu.org.uk](mailto:Matthew.Uren@nfu.org.uk)  
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Direct line: 01392 440700

Date: 28<sup>th</sup> March 2017

### **NFU comments: A303 Sparkford to Ilchester consultation**

Dear Highways England,

The National Farmers Union represents over 47,000 farmers and growers across England and Wales; more than 1,800 of these farm here in Somerset. We understand that during this stage of the above named consultation you are seeking views on:

- The two route options proposals to upgrade the A303 to dual carriageway between Sparkford to Ilchester, this being about 3.4 miles and;
- Local information, issues and concerns relevant to these works, including specific issues we feel should be addressed or concerns about potential impacts.

We were disappointed to find no reference to the impact on agricultural farm businesses or to agricultural land take in the consultation documentation, other than a brief mention in the technical document, so on behalf of our farming members please find below our response:

#### **Impact on Farm Businesses**

We do understand the need to upgrade the single lane sections of the A303 to dual carriageways to improve traffic flow and safety for the benefit of local communities, business and tourists as well as the enhance connectivity to the South West region. But many of **our members businesses will be significantly impacted by the proposed route Option 2 and associated construction works** between Sparkford and Ilchester. The amount of land that would have to be taken out of agricultural production is far greater for Option 2 than Option 1 and so the impact on the farm businesses is far greater.

The proposal to take the A303 in a loop to the north of the existing A303 means that the dual road would have to be constructed through a very unspoilt valley presently with only agricultural production taking place. The Valley has the Dyke Brook lying to the north of the proposed route which is liable to flooding. Option 2 would as it is presently highlighted cut right through the middle of three existing farm businesses and so the road would sever the land holdings greatly affecting the running and operations taking place. Three bridges have been highlighted in the proposal of Option 2 to provide access to all the land that would be severed but the impact on the farm businesses from so much land being compulsory purchased, remaining land severed and only the bridges providing access will mean that some of the businesses will not be sustainable. It will completely affect how some of the arable and livestock units are run. One farm business has a

successful high level equestrian business and if Option 2 was the chosen route there would be a very large question mark over whether it was possible or not to continue running this business.

**Please see below a section of map which highlights how the farms could be severed by the proposed Option 2.**

While the proposals for Option 1 following the existing road and carrying out expansion works to create the dualling has a far less of an impact on farm holdings due to the proposed new road only cutting through the top northern boundaries of holdings and fields.

It has been stated that as it exists the A303 is preventing businesses from reaching their potential and hampering quality of life in communities. This might be so but if Option 2 is taken forward this will have a major impact on four farming businesses and be far worse than just preventing reaching their potential. It could greatly disadvantage or even destroy the businesses and so will do far more than just hamper quality of life.

The NFU does understand that the infrastructure needs upgrading and for this to help improve the local economy but it must not be done to the detriment of farming businesses. Highways England must consider in greater detail the impact on the farm businesses and the amount of land that would have to be compulsory purchased when deciding on which option to take forward and the design.

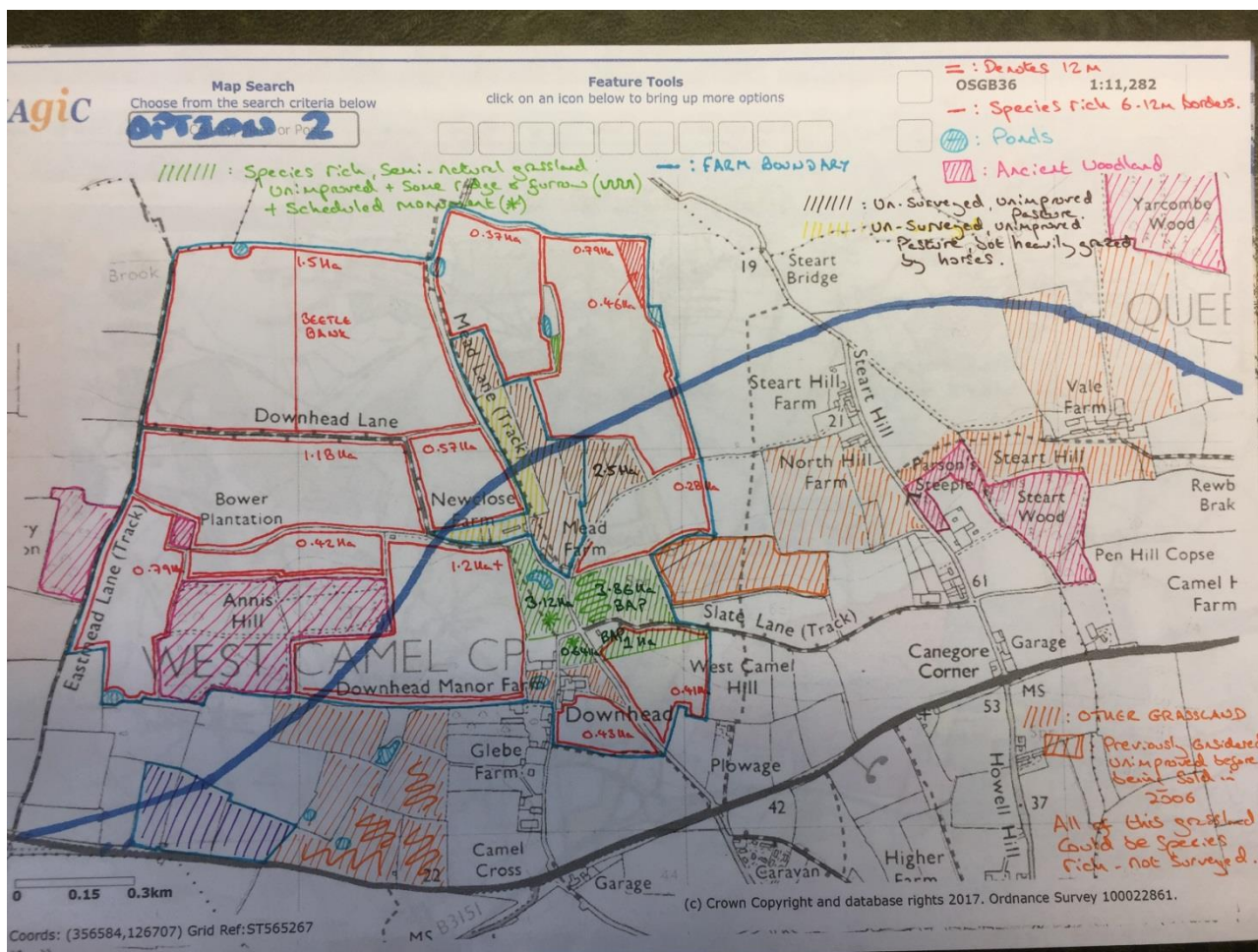
Further the NFU is very disappointed to see the lack of detail in regard to the impact on farming businesses covered in the technical report. It is mentioned at paragraph 3.1.2 how the local area is rural having mainly field boundaries and at paragraph 3.5.2 how the land is in agricultural use, with a mixture of arable and livestock and is grade two and three. There is no mention of the agricultural businesses that would be impacted and no areas of land that would have to be taken out of agricultural production have been highlighted. This is expected at the very least within a technical report.

It has been stated that the field pattern to the north of the existing scheme comprises large geometric field patterns and it is these fields that will cut and severed so badly by Option 2. Whereas the fields affected by option 1 will only be cut to the north of the boundaries and so severance is not such an issue.

Further under the heading Constraints at 4.1 in the technical report there is no mention of agricultural land/land take under the land use and community constraints.

All efforts must be made to maintain access to land from either Option 1 or 2.





**Environment**

It has been stated in the technical report and the consultation document that the environment is a key issue and that one of the benefits of the scheme is that the environment could be improved by reducing pollution from queuing traffic and that Highways England want to avoid disturbing protected species habitats and take opportunities to improve local diversity.

The NFU agrees that the environment in the local area is very important and that the area does have a species rich habitat. Further surveys must be undertaken and information gathered from the landowners in regard to the local environment. A lot of the land has been in Higher Level Environmental schemes and now Countryside Stewardship for over 20 years. This information once gathered must be considered in detail in regard to the impact that both Option 1 and 2 would have on the environment. If Highways England does not consider this carefully the scheme will not benefit the environment but greatly harm it.

In addition, the construction route area for Option 2 includes habitats which have been identified to be of **great importance and on the red list birds in the “2015 Report on Birds of Conservation Concern”** These birds include: Yellowhammer, Cuckoo, Song Thrush, Mistle Thrush, Skylark, House Sparrow, Lesser Spotted Woodpecker and Lapwing.

Although we recognise the importance of heritage conservation in the area we are disappointed to find little reference to the voluntary environmental agreements, environmental designations and important habitats within the Option areas – all of which are managed by farm businesses. We feel

that Highways England should demonstrate how they intend to safeguard these environment and landscape features as part of these works.

### **Consultation with Landowners**

We expect Highways England to thoroughly consult individual land owners who are impacted by the proposed works to gather their views and recommendations but we understand that this has **not taken place**. It is our understanding that there was about 18 months ago a public presentation at the Podimore Inn introducing by Highways England a “part online and part offline” widening of the existing carriageway which is as Option 1 has highlighted. No alternative route or Option 2 was highlighted at this presentation by Highways England.

Some of our members affected by the proposed scheme did receive letters on 16<sup>th</sup> December 2016 in regard to environmental surveys but again there was no mention of any route options.

One of our members found out about the scheme and in particular Option 2 when he was contacted by the press BBC Somerset asking if he would comment on the Option 2 route. Furthermore the member was informed that there was a “landowner” meeting being held that day and the following day at Haynes Motor Museum. **This is not at all acceptable and the NFU is amazed and shocked at the lack of direct contact with landowners whether it is for Option 1 or 2.**

The rules under the Planning Act 2008 for Nationally Significant Infrastructure Projects states very clearly that the developer must consult with affected parties. Our members have stated to us had it not been for the BBC contacting them they would not have known about the landowner meetings. Also some of our members were told that they had not been invited to a meeting due to their land not being on the land registry. **This again is not at all acceptable.**

Further our members only received a letter about this consultation on the day of one of the landowner meetings. This might be acceptable notification to a local village community of the consultation but not for a landowner whose business may be dramatically affected by the proposed Options.

In the technical appraisal report it has been stated that consultation took place with stakeholders back in July and August 2015. The NFU is very surprised that they were not consulted and would have thought they would have been treated like the National Trust as a non – statutory consultee due to the amount of land that will have to be compulsory purchased from landowners by whichever route option is chosen.

It is stated that there was engagement with key stakeholders, **surely landowners must be considered as key stakeholders but this did not happen.**

**Meetings for landowners and farmers:** The NFU requests that further specific meetings are held for landowners and farmers once this consultation has been completed to inform them of the next stages, relevant timings and to provide more specific detail as requested in this response to the consultation. These should be held along with more one to one meetings to ensure that there is minimal impact on farm business operation either as a direct or indirect result of these works.

### **Use Restrictions & Access**

Furthermore, **we expect that the upgraded road will not carry any limitations or restrictions which would prevent any type of agricultural vehicles accessing and using the entire A303.** As a result of this consultation **we require Highways England to clarify that there will be no**



**restrictions to agricultural vehicles on the A303** to appease the concerns that the local farming community have about this issue.

**Weight Limit restrictions:** No weight restrictions, or other restrictions, should be imposed on agricultural vehicles using the A303. In addition, there should be no weight or other restrictions placed on agricultural vehicles and the **type of agricultural material being transported** (for example hay and straw) on the A303. Any additional **local weight limit restrictions** imposed to protect communities from diverted or rat-run traffic before, during or after construction must not impact farm vehicles.

**Access to the A303:** Agricultural vehicles must have access to the new proposed A303 dual carriageway and this must be considered early in the design stage once a preferred route has been identified. For example, long diversion routes to access the A303 will not be acceptable for farm traffic as this will have a massive impact on the viability of some farm businesses. **The A303 is a very important link road for rural businesses in the area and as such should not leave any of them at a disadvantage.**

### **Construction Impacts**

The consultation documents highlight the need for careful and considered planning to ensure the least issues caused to road users and the World Heritage Site. However, we feel strongly that the **impact on farm businesses** in the immediate and local area must also be thoroughly reviewed and considered ahead of any construction works. Our comments on the construction of this scheme are as follows:

### **Economic Impacts**

The consultation documents highlight the need to balance the cost of the project with the economic benefits to the area. We agree with the need to achieve the best value for money during major infrastructure works. However, **this consultation does not recognise the economic benefits that the food and farming sector delivers to this area**, and we believe Highways England should seek ways in which to reduce the impact of these works on farm and food businesses, during and after construction.

- For example, **farm businesses in our county contribute £217 million GVA annually** with an output of £564 million agricultural output each year.
- Farm business support **a huge range of other rural businesses such as** feed, seed and fertiliser suppliers; machinery dealers, mechanics and engineers; legal, financial and advisory services; haulage and delivery companies; veterinary, genetics and nutritional specialists; builders, electricians and plumbers; local wholesalers and markets **to name but a few.**
- In addition, farm businesses themselves employ **over 12,300 full time workers** on holdings across the county and thousands of other part time and seasonal workers.
- Our farmers grow arable and horticultural crops, sheep, beef, pigs and poultry and produce milk for sale in local, national and international markets – as well as produce environmental outcomes for the benefit and enjoyment of all.

It is vital that **farm businesses are adequately compensated for their short and long term business losses** as a result of the A303 scheme, throughout all stages of the works.

## Conclusion

The NFU believes that Option 2 would cause severe damage to our members' farm businesses and take far too much land out of agriculture production and therefore our preference is that Option 1 is taken forward.

Highways England must take no more land than necessary to build the new road scheme so that the impact on the viability of farm businesses is reduced. Land taken on a temporary basis must be returned and reinstated in condition suitable for agricultural production.

We expect Highways England to take our comments and those of the landowners impacted into serious consideration ahead of any decision being made about the option to take forward.

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## A303 Sparkford to Ilchester Improvement.

### Non-Statutory Public Consultation Response on Route Options

Somerset County Council. 28 March 2017.

Author: Mike O'Dowd-Jones. Strategic Commissioning Manager Highways and Transport.

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#### **1.0. Introduction**

Somerset County Council understands that Highways England is undertaking a non-statutory consultation on route options for the A303 Sparkford to Ilchester dual carriageway improvement in order to assist the Secretary of State in selecting a preferred route for the scheme prior to entering the formal process of seeking consent to construct the scheme.

As a nationally significant infrastructure project, this scheme will be dealt with under the Development Consent Order (DCO) process. The role of the Council within this process is therefore as a statutory consultee.

The Council notes the information that has been provided in the material published for consultation including the Technical Appraisal Report (TAR), and notes that the design proposals are still at a very early stage in the development process including early stage indicative designs for junctions and side roads for each of the route options.

It will be necessary for further information to be made available to the Council in due course in order for us to fully assess the preferred route proposal once chosen. The Council understands that formal consultation will take place as part of the DCO process and expects to prepare a report on adequacy of consultation, a local impact report and a statement of common ground.

The Council notes that the TAR refers to a number of other technical reports that have been used to inform Highways England's proposals (e.g. Local Model Validation Report, Traffic Forecasting Report and Land Use & Economic Development Report). It is disappointing that these have not been made available to The Council at this stage in the process as it will be difficult for us to undertake our statutory role in preparing a statement of common ground and local impact report without this information. We wish to understand the potential impacts at an early stage in the process and would not wish to leave it until late in the process to be able to comment on the robustness and adequacy of the assessments undertaken, which is part of our statutory role. We wish to avoid an adversarial approach to the DCO process and would therefore appreciate as much transparency as possible in the earlier stages of scheme development.

The Council wish to make clear to Highways England that it is fully committed to the DCO process, and supports this scheme proposal in principle, but subject to the making of objective balanced judgements in relation to further more detailed information that will be provided as the preferred route progresses through the design stages and as detailed impact assessments are made available.

The Council would welcome further dialogue to agree arrangements for engagement in the process going forward and envisages setting out a schedule of the information that we feel will be necessary to enable us to meet our obligations as statutory consultee and as the authority responsible for the local highway network. Any commentary set out in this initial response should therefore not be

considered exhaustive and is made without prejudice to further information that we may request or further observations we may have during the process going forward.

## **2.0. The need for a dual carriageway improvement**

The Council strongly supports the need for the single carriageway section of the A303 between Sparkford and Ilchester to be upgraded to dual carriageway as part of an end-end whole route improvement of the A303/A358 between the M3 and the M5 at Taunton. If designed appropriately, the improvement will improve connectivity and access to the South West Region, improve the resilience of the strategic road network and help to promote economic growth in the region.

An economic impact study commissioned by the Council, published in February 2013<sup>1</sup> noted the following key benefits of an end-end route improvement based on comprehensive business & tourism surveys and transport economic assessment.

- 21,400 jobs
- £41.6bn boost to the economy (GVA)
- £1.9bn in transport benefits from reduced journey times
- Improve transport resilience to cope with incidents and during flooding
- Save over 1800 fatal or serious casualties over 60 years
- Reduce carbon emissions by 9%

A sectional economic analysis<sup>2</sup> demonstrated that the Sparkford-Ilchester dualling provided high value for money in its own right due to estimated journey time and safety improvements, with the scheme reducing congestion and delay on this section including a reduction in incidents, forming part of some 50km of uninterrupted dual carriageway.

The Council appreciates that the technical appraisal of the route has further developed since 2013, through feasibility studies undertaken by Department for Transport<sup>3</sup> and through subsequent work by Highways England set out in the Technical Appraisal Report (TAR) issued as part of this consultation. The feasibility study and TAR demonstrate that the scheme will meet its stated objectives and will present good value for money as an investment.

The Council continues to strongly support the proposal to provide a dual carriageway improvement between Sparkford and Ilchester and urges the Government to ensure sufficient funds are allocated to deliver the scheme alongside the further schemes required to improve the remaining sections of single carriageway to dual carriageway as part of a whole-route improvement.

## **3.0. Route options**

The Council has considered the four routes discussed in the TAR and the two route options put forward for consultation.

The Council notes Highways England's conclusion that at this stage, no option has clearly better performance in all aspects of safety and operation, environmental impacts and value for money; and that a judgement will need to be made on the balance of these aspects, which should include stakeholder feedback, in reaching a conclusion about the best option for a preferred route. We note the conclusion that option 2 (F1) performs slightly better than option 1 (A2) in economic terms;

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<sup>1</sup> A303 A358 A30 Corridor Improvement Programme Economic Impact Study, Parsons Brinkerhoff, Feb 2013

<sup>2</sup> A303 A358 A30 Corridor Sectional Economic Analysis, Parsons Brinkerhoff, Jan 2013.

<sup>3</sup> A303, A358 and A30 Corridor Feasibility Summary Report, DfT, March 2015.

option 1 (A2) is the better option in environmental terms; and option 2 (F1) is better in terms of safety, buildability and maintenance.

The Council has concluded based on the available information that it is not appropriate to express a route preference at this stage in the process, and that the choice of the preferred route should be a matter for Highways England to determine, taking into account community and stakeholder feedback from the consultation process along with appropriate technical appraisals.

#### **4.0. Highways and Transport Issues**

The Council has engaged with Highways England at a strategic level in developing the proposals but anticipates a number of matters in relation to the preferred route will have to be resolved in detail with Highways England if adversarial representation to the Planning Inspectorate Examination is to be avoided following submission of the DCO application. Such matters are likely to include:

- Impact of the scheme on the local road network, including any TROs to regulate use of former A303 if necessary, and agreement in relation to construction access and construction vehicle routing.
- Design of local road elements of the scheme, including alterations of junctions and side roads as appropriate.
- Flood risk and surface water drainage.
- Rights of way and access, including segregated crossings.
- De-trunking and transfer of former Highways England assets to Somerset County Council.
- Requirements for local Traffic Regulation Orders.

#### **4.1 Construction management.**

The impact of scheme construction and movement of materials is not set out in the consultation documents at this stage and The Council anticipates that a detailed construction traffic management plan will need to be agreed as part of the DCO process, explaining how construction impacts, in particular movement of materials will be minimised and mitigated. There could be considerable impact on the local highway network and in such circumstances the Council will seek to protect its roads under the legal provisions available.

#### **4.2. Junctions and side roads.**

The Council notes in the TAR that all junctions are currently designed to fully grade separated standards and that this approach will be reviewed as relevant design parameters become available.

Option 1 (A2) proposes two junction locations:

- At Downhead Lane to enable traffic to interchange between Steart Hill, Howell Hill and Downhead Lane and the proposed road; and
- At Hazlegrove, enabling interchange between the proposed road and the A359, High Street Sparkford, the access to Hazlegrove House and the Sparkford services.

Overbridges are proposed at the two junctions. An underpass is also proposed to connect properties at Camel Hill Farm with Traits Lane and the local road network to the south.

Option 2 (F1) proposes only a junction at Hazlegrove. A junction at the centre of the scheme is not proposed due to retention of the existing A303 carriageway as a local road, including all the

associated minor side road junctions. An overbridge is proposed at the Hazlegrove junction. Up to three further structures are proposed including accommodation bridges at Vale Farm and Downhead Lane, and a road overbridge at Steart Hill.

The TAR notes the proposed size and layout of these junctions will be determined during further design development and will be based upon predicted traffic volumes and relevant design standards.

Further dialogue with The Council will be required following selection of the preferred route in order to ensure that the impact of the proposed scheme and associated junction strategy on local traffic movement, safety and accessibility are fully quantified by Highways England, and understood by all parties, with any necessary mitigations agreed.

The Council and Highways England will need to discuss and agree appropriate treatment of the existing A303 if retained as a local road under option 2 (F1).

Engagement with The Council will be essential in order that safe and appropriate layouts and designs are agreed for any elements of the scheme interfacing with or impacting on the local road network. This includes junctions, overbridges and underpasses, changes to alignment of side roads or any other elements of the scheme. The TAR includes an initial safety review of the indicative proposals for junctions, overbridges and underpasses etc. The Council notes that initial safety concerns have been recorded for a number of the early designs for alignment of underpasses and matters such as curves, tight radii and gradients on side roads. Suggestions for reduced cross sections for some minor side roads are also referred to. Engagement with The Council will be necessary to ensure that safe and appropriate design solutions are agreed.

The proposals appear ambiguous about requirements for Non-Motorised User (NMU) provision at this stage, as NMU's may be banned from expressways and an objective for the scheme is to be expressway compatible. The scheme will need to ensure appropriate long-term provision for NMU movement is made particularly if Option 1 (A2) is chosen which does not leave a local road in place particularly for east-west movement.

The TAR notes that if the Downhead Lane junction were removed from Option 1 (A2), the economic case for the scheme would be expected to improve. The Council expects good levels of local connectivity between the local road network and the new road and is of the strong opinion at this point in the process, that a junction should be retained at Downhead Lane under this option.

#### **4.3. Flood Risk and Drainage.**

Detailed proposals for drainage and flood risk management are not set out in the consultation documents and the Council will require further information on those matters in order to agree that any temporary proposals and permanent solutions have adequately considered all flood risk and drainage considerations, including how the drainage system will function once it is constructed. It will be imperative to ensure that this scheme does not increase the flood risk in other areas.

#### **4.4. Public Rights of Way**

The TAR identifies several Public Rights of Ways (PRoW) and restricted byways within the vicinity of the route options:

- Option 1 (A2): 21 footpaths, two bridleways, and two restricted byways
- Option 2 (F1): 14 footpaths, one cycle route, two bridleways and one restricted byway

Both options being consulted on would result in the severance of several of these PRoWs. The technical appraisal report notes that these severed PRoWs would likely be replaced in the form of footbridges or underpasses, if deemed necessary following the completion of NMU surveys.

It is noted that the Council's adopted 'Rights of way improvement plan 2' is missing from the policy summary within the technical appraisal report and this contains several action and policy statements which are relevant to the scheme, particularly Action 1.4 and policy statements 3.1, 3.2 and 3.10.

Mitigation for severed ProWs will be necessary and this will either be in the form of diversion to the closest over/underbridge or the provision of a purpose built crossing for NMUs. Engagement with the Council will be essential in order that appropriate off-road space for NMUs is provided, appropriate parapet heights are provided particularly for equestrians, and appropriate diversion alignments are agreed. Where the mitigation is provision of a dedicated NMU over/underbridge then every consideration should be given to providing access for all NMUs, and looking at what local improvements could be made either in physical or legal status to improve the situation for NMUs.

It is noted that an indicative design solution is yet to be developed to retain an existing footpath through the proposed Hazelgrove junction. Engagement with The Council will be needed to ensure an appropriate solution is agreed.

Any NMU studies should not be taken as a reflection of lack of demand. The current flows on the A303 are likely to be a deterrent for many NMUs in using the current path network.

It is highly recommended that detailed discussion takes place with local user group representatives to ensure that any routes believed to carry public rights, or higher rights than are already recorded, are captured and considered as part of proposal development.

This development presents an opportunity to address an issue at Ilchester where a public bridleway now crosses the A303 at grade, following a public inquiry which upgraded the footpath to a bridleway on the line of the old road as opposed to a new accommodation bridge. The bridge parapets now require upgrading in order that the bridleway rights can be diverted onto the bridge. The current situation leaves Highways England exposed to potential enforcement action and the County Council are keen to work towards resolution of this issue. Whilst it falls just outside of the proposal, there could be significant cost savings to be made by including these works within the scheme. A second application has been made to delete the bridleway but this will not be determined for many years. Should Highways England wish to include the parapet works within the scheme then The Council will explore what opportunity there may be to determine the application as a priority. Whatever the recommendation is of the investigation into the second application, there is likely to be opposition to it, thus involving a referral to the Secretary of State for confirmation/ determination.

#### **4.5. De-trunking and transfer of former Highways England assets to Somerset County Council.**

Both the consultation options provide for sections of the existing A303 to be replaced by a new route. The existing road, where superseded by the new route, will be 'detrunked', downgraded or stopped up as circumstances require. Whichever way, those redundant sections of road will revert either to The Council as the Local Highway Authority, or to private interests if stopped up.

The scheme details do not seek to identify the end uses of all parts of the road, but suggest that sections will need to be kept open for local use. For those sections which fall to the responsibility of the Council under DCO de-trunking procedures, it is normal practice for the Local Highway Authority to be compensated by HE for the additional maintenance burden the roads will present to the

Council. The Council therefore needs to have agreed, when the DCO application is submitted, what the compensatory arrangements will be and what will be the end uses of all redundant sections of the A303 route.

#### **4.6. Requirements for local Traffic Regulation Orders.**

The Council will need to be assured, before the DCO application is made, that all identified necessary TROs are included in the process, in particular that it is not left for the Council to address TROs necessary to regulate traffic on the existing county road network before, during or after construction, or on any de-trunked sections of the existing A303.

#### **5.0. Environmental and Social Impacts**

The Council notes that initial environmental and social impact assessments have been undertaken and that consultation has started with the statutory environmental bodies. The Council notes that the options have varying levels of impact on Noise, Air Quality and Greenhouse Gases, Landscape, Archaeology, Listed Buildings, Historic Environment, Biodiversity, Water Environment, Physical Activity, Journey Quality and Severance.

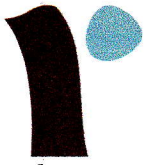
The Council notes Highways England's conclusion that overall, the options show mixed results in the environmental assessment, with none performing significantly better across all criteria.

Stakeholders are awaiting more detailed reports on the Historic Environment section and are unable to comment further at this stage.

Continued engagement with the statutory environmental bodies, South West Heritage Trust, and The Council will be essential as the scheme develops in order to ensure potential environmental and social impacts of the preferred route are identified and mitigated.

**END**





**ramblers**

at the heart of walking

From: Carleton Earl  
Area Footpath Secretary  
Somerset Ramblers  
Fulwood House  
Winsham  
Chard TA20 4EE

23<sup>rd</sup> March 2017

Dear Mr Stock,

**A303 Dualling – Sparkford to Ilchester**

Somerset Ramblers has considered the options proposed for this project and wish to state the following views:

We would strongly object to Option 2, as it would have a much more significant effect in terms of noise, pollution and environmental impact in an entirely rural area currently away from major roads.

We would prefer Option 1 as the road would be generally on its present alignment and would not further intrude greatly on the environment.

We would, however, stress that there should be no at grade crossings for any public right of way and that proper provision for ensuring access to existing rights of way is retained in a safe way. Safe opportunities to connect RoW north and south of the new road must also be provided.

Yours sincerely,

C. Earl

Mr D. Stock  
Major Projects South West  
Highways England  
2/07k Temple Quay House  
2, The Square  
Bristol BS1 6HA



David Stock – Project Manager  
A303 Sparkford to Ilchester Project Team  
Highways England  
2/07K Temple Quay House  
2 The Square  
Temple Quay  
Bristol  
BS1 6HA

Dear Mr Stock

28 March 2017

### **A303 Sparkford to Ilchester Dualling**

Thank you for giving Somerset Wildlife Trust the opportunity to comment on the selection process for the proposed options for the A303 Sparkford to Ilchester Dualling scheme. Our comments will relate only to the potential environmental impacts of the proposed route options and will not cover the other aspects, e.g. costs, engineering, navigational or environmental health (noise etc.) of the proposed routes. We note that the current preferred options are Option 1 (formerly option A2) and Option 2 (formerly option F1).

We would like to highlight that Somerset Wildlife Trust has worked in partnership with Somerset County Council to map the ecological networks in the county. Maps of Somerset's Ecological Networks are now available to Local Planning Authorities (LPA) through the Somerset Environmental Records Centre and have been distributed to all LPAs.

In providing the following comments we have referred to:

- Somerset's Ecological Network maps
- Designated Site, Local Wildlife Site and Species data held by Somerset Environmental records centre (SERC)
- <http://www.natureonthemap.naturalengland.org.uk/MagicMap.aspx> (Nature on the Map)
- Adhoc species data supplied to us

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As you are aware, there are obviously impacts to the natural environment from both options. Below we highlight those that we feel are the greatest potential impacts, and therefore those that will require consideration and potential mitigation or compensation in the final scheme.

Once the preferred option has been selected, we would like to see a clear audit of existing (pre-development) wildlife habitat and post-development wildlife habitat, which will show clearly that the construction scheme is resulting in a net gain for nature as per the ambitions set out in the 2011 Natural Environment White Paper<sup>1</sup>, embraced in the 2012 National Planning Policy Framework<sup>2</sup>, and reinforced in Planning Policy Guidance<sup>3</sup>, which states: *“...The National Planning Policy Framework is clear that pursuing sustainable development includes moving from a net loss of biodiversity to achieving net gains for nature, and that a core principle for planning is that it should contribute to conserving and enhancing the natural environment and reducing pollution ...”*.

### **Comments on proposed routes – Option 1:**

Option 1 potentially impacts on Camel Hill Transmitter Site LWS, an area of semi-natural broadleaved woodland and Lowland Calcareous Grassland. Lowland Calcareous Grassland is a habitat of principal importance included on The Natural Environment and Rural Communities (NERC) Act Section 41 (S41) list. S41 habitats were identified as requiring action in the UK Biodiversity Action Plan (UK BAP) and continue to be regarded as conservation priorities in the subsequent UK Post-2010 Biodiversity Framework. Whilst option 1 does not appear to reduce the extent of the grassland, the boundary on one side will become even less permeable (less easy for species to disperse across) for associated grassland species.

The remainder of the option 1 route is partly in line, following the route of the existing A303 but with some new sections that take a route through farmland that appears largely arable or improved permanent pasture, although this would need to be confirmed. Some hedgerows will be lost and thus potential wildlife habitat for invertebrates, birds and bats for foraging, navigation and shelter.

---

<sup>1</sup> Cm 8082;

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/228842/8082.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/228842/8082.pdf) Exec Summary para 5; main text para 2.8

<sup>2</sup> [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/6077/2116950.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf), paras 9 & 11

<sup>3</sup> Natural Environment/Biodiversity and ecosystems, Paragraph: 007 Reference ID: 8-007-20140306 <http://planningguidance.communities.gov.uk/blog/guidance/natural-environment/biodiversity-ecosystems-and-green-infrastructure/>

### **Options 1 & 2:**

We note that both options, 1 and 2, cut through a Registered Parks and Garden site, Hazlegrove Park: historical parkland with an important assemblage of veteran trees that qualifies as UK BAP/S41 list Wood-Pasture and Parkland habitat. The route places a potential new junction within the parkland and for both options a section of road will impact on the southern boundary of the main part of Hazlegrove Park LWS – selected for its veteran trees and associated specialist invertebrate fauna. Option 2 appears to potentially have the greatest impact on the parkland by fragmenting and isolating a larger area of the parkland and by creating a physical impermeable barrier between the main part of Hazlegrove Park LWS and a small additional area to the south.

### **Option 2:**

Option 2, in our opinion, is likely to have a far greater impact on the landscape and the species that it supports, than option 1. Option 2 would take an entirely novel route through currently undeveloped farmland. The physical area of land lost to the road can be assumed far greater in option 2 than with option 1, which largely widens an existing road or impacts on the margins of arable fields already bordering the existing A303.

With option 2, the existing A303 to the south would be retained: some traffic would therefore continue to use the existing route. The effect of keeping the existing A303 to the south and constructing a second road to the north would essentially create an island of farmland entirely bounded by A-roads: the result of this would be to isolate less mobile species in a fragment of habitat with a barrier to both dispersal into the surrounding countryside, and a barrier to colonisation from outside. Disturbance to sensitive animal species (e.g. mammals, birds, bats) would be considerable.

Maps of Somerset's Ecological Networks show that a species-rich grassland ecological network is located in the area that would become isolated by the construction of the road for option 2. The core habitat in this network (Slate Lane fields) is an area of Lowland Calcareous Grassland – a UK BAP priority habitat/S41 list habitat of principal importance. We also note from Nature on the Map that there are areas of two other S41 list habitats in this potentially isolated and fragmented area of land: Traditional Orchards and Lowland Meadows. Both habitats are of conservation importance. Traditional Orchards can support numerous S41/UK BAP priority habitats and species, as well as an array of Nationally Rare and Nationally Scarce species. These include lichens sensitive to air pollution and specialist invertebrate species.

Of particular concern with option 2 is the potential impact on the Local Wildlife Site (LWS) of Annis Hill, which supports S41 habitat Lowland Mixed Deciduous Woodland. A 1991 survey of this woodland recorded 12 species considered indicators of Ancient Semi-natural Woodland. Option 2 would pass in very close proximity to the southern and eastern parts of this woodland, increasing disturbance to woodland species and severing connections to the surrounding landscape: in particular, severing connections to hedgerows that act as wildlife corridors (for navigation, foraging and shelter) for woodland-dwelling species such as bats and birds. There is a further woodland LWS, Parson's Steeple (Ancient Replanted with 14 ancient woodland indicator species in the 1991 LWS survey), which would become disconnected from the wider landscape by the proposed road, and cut-off from Annis Hill LWS by the proposed road. Woodland species would also be cut-off from the neighbouring LWS and ancient semi-natural woodland of Yarcombe Wood, lying to the north of the proposed option 2 route.

Somerset Wildlife Trust has also recently been made aware of several species of conservation importance that may be impacted by the habitat fragmentation created by option 2. There is a breeding population of S41 species Brown Hairstreak (*Thecla betulae*) in the area, and specifically adult butterflies have been recorded at a location along the northern hedgerow of Downhead Lane at approximately ST56372576 (M.R. Fletcher, 2013<sup>4</sup>). This hedgerow would be lost with option 2. There is also anecdotal evidence that a number of bat species are using the area, with a confirmed record for Brown Long-eared Bat (*Plecotus auritus*) in the SERC records. Loss of connectivity between woodland, parkland, orchard and hedgerows will impact negatively on bat species.

In summary:

**Option 1:**

- Some habitat loss of Hazlegrove Park registered Park and Garden and UK BAP/S41 parkland habitat; and impact on the southern boundary of the Hazlegrove Park LWS.
- Increased disturbance to, and creation of a less permeable edge to the Camel Hill Transmitter Site LWS.
- Loss of some hedgerows, some of which may be species-rich, reducing connectivity in the landscape and decreasing hedgerow habitat that may be used by faunal species for foraging, navigation, shelter and/ or nesting.
- Habitat loss of the creation of an even greater barrier to dispersal for species due to the physical widening of the road.

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<sup>4</sup> Report on Lepidoptera found at Downhead Manor Farm: Summer 2013. M.R. Fletcher.

## Option 2:

- Greater habitat loss of Hazlegrove Park registered Park and Garden than option 1; impact on the southern boundary of the Hazlegrove Park LWS; and fragmentation of two parts of the LWS.
- Habitat fragmentation – an area of farmland will become disconnected from the surrounding landscape by creating an additional physical barrier to the north creating an ‘island’. Important habitats within this ‘island’ include Ancient Semi-natural woodland, Lowland Meadow, Lowland Calcareous Grassland, Traditional Orchards, Parkland with Veteran Trees and hedgerows.
- Loss of connectivity with the wider landscape to one of Somerset’s mapped Species-rich Grassland Ecological Network, which supports the S41 list habitat of principal importance Lowland Calcareous Grassland and its associated species.
- Increased disturbance and pollution to Annis Hill LWS, and a severing of connections for woodland species to associated hedgerow habitat and other neighbouring woodland LWSs.
- Physical separation and therefore disconnection of Parson’s Steeple LWS from Annis Hill and Yarcombe Wood LWSs, reducing potential for dispersal, migration and colonisation of species.
- Direct loss of habitat and potentially the colony of S41 list species of principal importance Black Hairstreak.
- Negative impacts on bat species due to fragmentation of habitat.

It is our opinion that option 2 is likely to have much greater, and really quite considerable negative impacts on the habitats and species in the local environs than option 1, although option 1 is not without negative impacts. Somerset Wildlife Trust would hope that this infrastructure project upholds the ambitions of the Government’s White Paper and the guidance of the NPPF and aims at not just minimising impacts on the natural environment but also aims to enhance biodiversity through the scheme by careful consideration to habitat creation and enhancement in the post-scheme landscape, with priority given to achieving strong habitat connectivity.

Thank you for the opportunity to provide our feedback and initial thoughts on the proposed route options. Please contact me if I can be of further assistance.

Yours Sincerely,



Dr Belinda Wheeler MCIEEM

Landscape Ecologist

Tel: 01823 652473

Email: [belinda.wheeler@somersetwildlife.org](mailto:belinda.wheeler@somersetwildlife.org)



Mon 27/03/2017 16:55

sarah ann Bucks <bryantsfarm@hotmail.com>

South Somerset Bridleways response to consultation

To ○ A303 Sparkford to Ilchester Dualling

South Somerset Bridleways Association  
Bryants Farm  
Dowlish Wake  
Ilminster  
Somerset  
TA19 0NX

27<sup>th</sup>. March 2017

Dear Sirs,

On behalf of the South Somerset Bridleways Association I attended the consultation at West Camel earlier this month. I was surprised to find no references to horse riders and carriage drivers.

I would be grateful for an explanation why neither of the schemes put forward for this consultation (route options 1 and 2) adheres to Highways England's own policy statements; in particular

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/526226/S150749\\_Accessibility\\_Strategy\\_4pp\\_V3.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/526226/S150749_Accessibility_Strategy_4pp_V3.pdf)

No mention is made of multiuser paths. Nor does this consultation appear to comply with many of Transport Focus' recommendations in 'Cyclists, pedestrians and equestrians: a summary of priorities for Highways England's Network'.

If you are unfamiliar with these two documents, please let me know.

I would like to make the following general comments and request that they be given some consideration when planning the new route.

1. No provisions have been made for public rights of way joining or crossing the proposed route options.
2. Best value would be to designate restricted byways rather than the proposed cycle paths.
3. Crossing points for all vulnerable users (not only pedestrians and cyclists), either by over bridge or underpass, should be to bridleway or restricted byway status. If there is to be an at grade intersection, provision should be made for vulnerable users.
5. Horse tourism is important and this means that cross county routes, both north to south as well as east-west, are vital. It is important that whichever route option is chosen does not sever any long distance routes.
6. Route option 1, which is mainly along the existing route, has some crossing points which have become dangerous for horse riders. If this option is chosen, we would expect these crossing points to be diverted onto a bridge or through an underpass.
7. There are a number of restricted byways, bridleways, and minor roads in the area through which Route option 2 will pass, and we would hope that Highways England will substitute new routes of the same status in lieu of any which have to be stopped up or diverted.
8. We believe that the definitive map is not up to date. For example, when this road was last improved in 1996 a bridleway was dedicated. Until recently, and possibly still, this has not yet been added to the Definitive map. We have repeatedly asked Somerset County Council to process this LEMO. Please be aware of this and other failings in the definitive map for Somerset.
9. There are several routes joining the A303 which, we believe, have under-recorded rights. In due course we will submit DMMO applications for these, and they should then be taken into account in the ensuing consultation. In particular the bridleway which comes to the A303 at Camel Hill, and also a route from Camel Hill House, past Rewber Brake, and on to Vale Farm.
10. Our association has several members in the area and also know that horses are kept around the area of route option 2.



For Option 1, please could consideration be given to providing safe crossing points at the following:

1. Eastmead Lane/Podimore Lane (ST 5527 2502) This already has a vehicular bridge and any replacement should be to the same standard)
2. Downhead Road/Camel Cross(ST5665 2491) Currently this junction is a confusion of an unclassified road from the north, a footpath crossing the A303 at grade, a class 2 road coming from the southwest, and a classified un-numbered road coming to within a short distance of the junction and terminating in a footpath. Obviously there will have to be some solution to make this crossing safe, and we request that it, by over bridge or underpass, be made to at least restricted byway status.
3. Plowage crossing (ST 5710 2506) This crossing point currently takes riders from the restricted byway south of the A303 (Cottis Lane) across to connect up to Slate Lane. It is important to keep the north south crossing available, and obviously any improvement to safety would be welcome as this crossing is not currently safe.
4. Conegar Corner (ST 5785 2538) It is presumed that a bridge or underpass would be constructed to accommodate this crossing. If there is to be some form of at-grade junction, such as a roundabout, please could consideration be given to installing a Pegasus crossing. This would satisfy cyclists as well as horse riders.
5. Traits Lane (ST 5874 2552). We understand that provision is already under consideration for this junction.
6. Slewed crossing at Camel Hill / Gason Lane (ST 5900 2555). This is important to horse riders and our association would be pleased if some form of safe crossing could be provided, possibly combined with the one for Traits Lane. We believe that there are under-recorded bridleway rights going north west from this junction up to Vale Farm.
7. Ridge Copse (ST 5952 2570) We believe there are under-recorded bridleway rights at Ridge Copse and are submitting a DMMO application. It appears that this will join the section of the A303 which will be downgraded to a local or service road.

For Option 2, please could consideration be given to maintaining routes for vulnerable users where they already exist. Until the line of the route is more accurately drawn, there is little point in listing each potential crossing. What is important to us is to maintain and hopefully improve the north –south routes across the county.

I would be pleased to discuss any of the specific points listed above.

Please could I be contacted directly when there is going to be a consultation on upgrading the A358 between Ilminster and Taunton as this also passes through the area covered by our organisation.

Yours faithfully,

Sarah Bucks  
Chair, South Somerset Bridleways Association



Mon 14/08/2017 08:53

Sparkford Parish Clerk <sparkford.clerk@gmail.com>

A303 consultation response - Sparkford PC

To ● Burgess, Hannah

Hi Hannah

Sparkford Parish Council do not have a strong majority view on the proposals.

Comments from Parish Councillors are outlined below:

Three Councillors feel that the first option is the preferred. Their reasons are because this option runs the same route as it does now so would save a massive swathe of open countryside being destroyed and there would seem little reason to spoil the open countryside and side it towards Babcary as this would be a huge destruction to the natural wildlife and eco system. This option would ensure continued employment at existing businesses along the A303 with an interchange at Plowage Lane. The second option could also have a huge drainage problem.

Four Councillors feel that the second option is the preferred. Their reasons are that the alternative route could create many years of disruption which could lead to significant problems for Sparkford. This option is also more cost effective and after the works are complete we should be left with the old A303 providing good access for the surrounding villages.

In summary either option would have little impact on Sparkford but the Parish Council are concerned about what is happening to the roundabout and access to Hazelgrove School east and west bound if they are not having run off to a roundabout like Wincanton. How will traffic access Queen Camel and the other smaller hamlets? Are they going to come off at North Cadbury and come through our village?

Regards

Lisa

--

**LISA DAVIS**  
**Sparkford Parish Clerk**



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Mr D. Stock – Major Projects South West  
Highways England

[By Email: [A303SparkfordtoIlchesterDualling@highwaysengland.co.uk](mailto:A303SparkfordtoIlchesterDualling@highwaysengland.co.uk)]

27 March 2017

Dear Mr Stock

### **A303 Sparkford to Ilchester Dualling**

Thank you for your consultation letter of 7 February 2017 seeking the views of the Coal Authority on the above proposal.

The Coal Authority is a non-departmental public body sponsored by the Department of Business, Energy and Industrial Strategy. As a statutory consultee, the Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas.

#### The Coal Authority Response:

I have checked the proposed development area for the A303 dualling between Sparkford and Ilchester against our coal mining information and can confirm that this falls outside of the defined coalfield. Accordingly, the Coal Authority has **no comments** to make on this project.

In the spirit of ensuring efficiency of resources and proportionality it will not be necessary for you to consult the Coal Authority at any future stages of the project. This letter can be used as evidence for the legal and procedural consultation requirements.

Yours sincerely

*Mark Harrison*

**Mark E. N. Harrison** *B.A.(Hons), DipTP, LL.M, MInstLM, MRTPI*

**Principal Manager – Planning & Local Authority Liaison**

## WEST CAMEL PARISH COUNCIL FEEDBACK TO HIGHWAYS ENGLAND CONSULTATION ON DUALLING THE SPARKFORD TO ILCHESTER (PODIMORE) SECTION OF THE A303.

The Parish of West Camel has the most residents that will be directly affected by the planned changes to the A303 and feel that our voice will be overwhelmed due to the wider consultation of the opinions of the general public. As we will have to live with the outcome, we feel very strongly that that our opinions should be given proper regard within the planning process.

- Option 1 has a far greater and direct impact to main settlements of West Camel and so there is clear majority preference for Option 2 to be taken forward. In the following pages, option 1 therefore carries more issues and suggestions to help mitigate the visual, noise and environmental pollutions we will be directly subjected to should this option go ahead.
- We stress the necessity of a full east/west link road between Sparkford/Hazlegrove and Podimore roundabout (such as the existing A303) in addition to the new expressway regardless of the option chosen. This will help mitigate safety concerns during periods of construction and whenever the new expressway is compromised, in addition to providing local access.
- West Camel has a history of flooding and as such demands that proper consideration should be given to the flooding impacts to the village. Works should not simply plan to 'not make matters worse', but should look to improve measures during this once in a lifetime opportunity.
- The proposed junction at Downhead for option 1 should be removed from all planning. **10 lanes of roadway** will be created around the proposed junction, plus the creation of a new highway standard carriageway in place of Slate Lane. The overwhelming response of parishioners is that no additional junction should be created at Downhead, which will simply encourage 'rat run' traffic. An east/west link road as above negates the need for this.
- Both options destroy roughly equal amounts of productive farmland, with Option 1 directly affecting many more people who live close to this route, and Option 2 destroying a currently undisturbed valley and woodland.

Whichever option is chosen, West Camel parish council would like a detailed explanation of the rationale for the decision.

The parish council has collected feedback from its parishioners and the following table lists our comments and concerns in detail.

Area of Concern	General Comments
<p><b>General Consultation Process – Haynes 14<sup>th</sup> Feb &amp; West Camel Davis Hall 10<sup>th</sup> March</b></p>	<p>An over-riding view from councillors and residents was that Highways England has failed to provide sufficient detail for people to make an informed choice in the consultation. Comments received included -</p> <ul style="list-style-type: none"> <li>• Lack of information, lines on maps, no junction, profile, cutting, noise suppression information or data. Highways England (HE) staff gave wildly differing response to councillors / residents and consistently denied knowledge of detailed information later found in their own Technical Appraisal Report (TAR) on their own web site.</li> <li>• Lack of information ‘fuels’ a divisive NIMBY response and could be interpreted as deliberately exacerbating environmental issues associated with Option 2.</li> <li>• It was pointed out that in an earlier consultation (1991) full details had been made available from the start, allowing informed decision making.</li> <li>• Highways England describe Option 2 as being the better option in economic terms, safety, buildability and maintenance with environmental concerns more favourable for Option 1, <b>so why not simply alter the Option 2 route to avoid Annis Hill wood?</b></li> <li>• Residents were astounded to learn that anyone inside or outside the UK can express an opinion – how will these be weighted in respect of proximity? <b>Surely the views of those directly affected should predominate and decision making?</b></li> </ul>
<p><b>General – Keeping the existing A303 intact</b></p>	<p>Of the four options considered in the TAR, only one (A2 which became Option 1) impacts the continuity of the existing A303. Many residents have commented that keeping the existing A303 intact between Sparkford and Podimore would –</p> <ul style="list-style-type: none"> <li>• Help local business along this section of the A303 survive.</li> <li>• Could provide new business opportunities and hence local employment.</li> <li>• Provides a sensible diversion route in the event of an accident or maintenance on the new A303 Expressway.</li> <li>• Avoids the need to use the A359 / Queen Camel (past new school – not on HE plans!) / Bridgehampton / Stockwich Cross and Podimore village as an alternative diversion route.</li> <li>• This could open up possibilities for local residents to use /walk to the bakery.</li> <li>• Would by default enhance community connectivity with Downhead and Steart Hill.</li> <li>• Would provide good access from Yeovilton Base to the new A303 Expressway.</li> <li>• Would allow slow moving agricultural traffic to move around the area with ease</li> </ul> <p>For many years after the completion of this upgrade, traffic will queue at Podimore as the first major westbound interchange on the new expressway. Should option 1 be chosen, how will the small local roads of West Camel and other villages be saved from ‘rat run’ traffic?</p>
<p><b>Junction arrangements</b></p>	<p>A major concern for residents of West Camel Village is about minimising the existing ‘Rat-Run’ usage by vehicles (HGVs, LGVs (white van man) and Cars) which pass through West Camel travelling north / south or south west / north west.</p> <p>Residents expressed an overwhelming preference for –</p> <ul style="list-style-type: none"> <li>• <b>No junctions on either option between Sparkford and Podimore and retain / realign the existing A303 to facilitate</b></li> </ul>

	<p><b>construction of the proposed Expressway in a cutting.</b></p> <ul style="list-style-type: none"> <li>This will facilitate the construction of a bridge to connect Downhead Lane to the existing A303 and negate the need to upgrade Slate Lane – placing the new Expressway in a cutting at Conigore would facilitate construction of a bridge connecting Steart Hill to the retained (or realigned) old A303 to channel HGV traffic (Hopkins) east or west to join the Expressway at Podimore or Sparkford rather than using Howell Hill through West Camel.</li> </ul>
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## Option specific feedback

Area of Concern	Comments - Option 1	Comments - Option 2
<b>General Comments on Option Choice</b>	<p><b>Against Option1 –</b> Most of Option 1 would also be built on unspoilt countryside and good farmland. Proximity to the settlement of West Camel, potential for increased noise and pollution especially from the raised section east of Conigore Corner.</p>	<p><b>Against Option 2 –</b> The destruction of unspoilt countryside and farmland. The severance of four large farms, which would make conducting their business more difficult. If Option 2 is chosen, then, in addition to the two road bridges mentioned on the plans, it would be necessary to construct at least three extra bridges for farm vehicles and machinery from the affected farms to access land that would be severed.</p>
<b>Construction phase</b>	<p>Residents voiced concerns about congestion during construction should Option 1 be chosen, with possibly 3+ years of delayed traffic trying to find alternative routes to the existing A303.</p> <ul style="list-style-type: none"> <li>Danger of diverting traffic passing the new school in Queen Camel (not even shown on HE plans!).</li> <li>Historically there have been over 10 RTAs (Road Traffic Accidents) on the crossroads above West Camel on the Queen Camel – Bridgehampton Rd – caused in the main by drivers leaving the A303 during periods of congestion seeking alternative routes, blindly following sat-navs.</li> <li>The construction phase is longer for option 1 and would disrupt travel for a far greater proportion if its build time.</li> </ul>	<p>No feedback has been received regarding the impact of the Construction Phase on Option 2. As mentioned in the TAR – Options 2 disruption is limited to the new/existing road connection phase. Obviously there will be some delays to local traffic on the Babcary road (Steart Lane) during bridge construction and field access will need to be considered and agreed with land owners.</p>
<b>Flooding</b>	<p>While it is acknowledged that modern road construction should adequately deal with surface water issues, concern remains in a community with a serious history of flooding –</p> <ul style="list-style-type: none"> <li>In any failure situation (option 1) – water travels downhill – into West Camel.</li> </ul>	<p>Potential flooding issues have been raised concerning Option 2, although this is limited to fields and not residential dwellings as in Option 1. Common concerns apply equally to Option 2 -</p> <ul style="list-style-type: none"> <li>Designs need to be shared, publically in detail with the community <b>for both options</b> including Dyke Brook and</li> </ul>

Area of Concern	Comments - Option 1	Comments - Option 2
	<ul style="list-style-type: none"> <li>• Designs need to be shared, publically in detail with the community <b>for both options</b> including Dyke Brook and eventual outfall to the river system.</li> <li>• Existing / retained A303 surface water drainage is <b>inadequate</b> and needs to be re-engineered before retained carriageway is declassified and handed to Somerset County Council – again work with the community who have local knowledge.</li> <li>• Surface water discharge design should not impact existing River Cam flow rates – i.e. additional downstream discharge from A303 could cause flooding upstream in West Camel.</li> </ul>	<p>eventual outfall to the river system.</p> <ul style="list-style-type: none"> <li>• Existing / retained A303 surface water drainage is <b>inadequate</b> and needs to be re-engineered before retained carriageway is declassified and handed to Somerset County Council – again work with the community who have local knowledge.</li> <li>• Surface water discharge design should not impact existing River Cam flow rates – i.e. additional downstream discharge from A303 could cause flooding upstream in West Camel.</li> </ul>
<p><b>Proximity to residences / groups of residences</b></p>	<p>Many residents expressed concern over how close to their homes either option might be –</p> <ul style="list-style-type: none"> <li>• Orchard Park – residents pointed out that option 1 would be only 200m from their homes.</li> <li>• Two properties at Conigore Corner would be less that 30m from the proposed dual carriageway as would ‘Blue haze’ in neighbouring QC parish.</li> </ul>	<p>Several residents expressed concern over how close to their homes either option might be –</p> <ul style="list-style-type: none"> <li>• The owners of Newclose Farm (Mr &amp; Mrs R Whittington) have asked – can the road be moved further away? (<b>see comments on Route Alignment below</b>).</li> </ul>
<p><b>Route Alignment</b></p>	<ul style="list-style-type: none"> <li>• Under Option 1 the proposed section of dual carriageway to the east and south of Conigore Corner appears to be elevated some 6m above the existing field level. We can only assume that this is to facilitate ease of construction and maintaining traffic flow during construction? The more logical construction of a cutting, in similar fashion to the route to the west, would help negate noise, pollution and visual impact.</li> </ul>	<ul style="list-style-type: none"> <li>• We would suggest that Highways England consider realigning Option 2 proposals to reflect initially the line shown in discarded Option B4 i.e. after leaving Podimore overbridge the route should pass to the north of Annis Hill Wood, before re-joining the existing line of Option 2. This would provide greater separation from properties, Newclose &amp; Mead Farms as well as other properties in Downhead. <b>NB.</b> Local Farmer Tim Clark would want to discuss the finer detail of this amendment.</li> </ul>
<p><b>Safety</b></p>	<p>Highways England technical document clearly states that Option 1 would be the least safe route, and is also the only route option where there are no realistic route alternatives. Any incident/closure would lead to drivers using poor local country roads, leading to yet more safety issues for local</p>	<p>Construction of Option 2 (or indeed either of the other two discarded routes B4 or E4) would leave the existing A303 intact between Sparkford and Podimore to take overflow traffic in times of congestion due to accident or maintenance. This would save traffic diverting onto local lanes which are not</p>



Area of Concern	Comments - Option 1	Comments - Option 2
	<p>residents and causing severe disruption. We suggest Highways look to create and manage a proper alternative route for the anticipated incidents and closures alongside the complete length of the proposed expressway.</p> <p>Increased 'rat run' traffic will cause more accidents and injuries as travellers seek to avoid the major trunk route during closures and peak flows.</p>	<p>capable of handling this type and volume of traffic.</p>
<p><b>Eco Concerns</b></p>	<p>Several residents queried concerns raised over loss of farm land and the following points were made –</p> <ul style="list-style-type: none"> <li>• Both options will consume existing 'greenfield farmland' for all or most of their length.</li> <li>• Noise and air pollution to the populated area of West Camel is far greater with this option.</li> <li>• The landscape above the village will change from 2 lanes to 10 lanes. <b>This is unacceptable.</b></li> </ul>	<p>Several residents queried concerns raised over loss of farm land and the following points were made –</p> <ul style="list-style-type: none"> <li>• Opponents of Option 2 cite the loss of relatively unspoilt farmland, bio-diversity etc.</li> <li>• Farmers in the Sparkford Vale are concerned about managing their farms which may be divided should Option2 be built.</li> <li>• Some farmers do farm to a very high eco-friendly standard, lay hedges and keep ditches clear and will be devastated by the loss of farm land and division of their farms.</li> <li>• From a local farmer – most of the bio-diversity was damaged years ago when field hedges were ripped out to facilitate modern arable farming methods.</li> <li>• Wildlife adapts as can be seen from existing stretches of dualled A303 e.g. Sparkford.</li> <li>• Unspoiled by human habitation perhaps but scarred by modern farming techniques requiring large fields.</li> </ul>



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28<sup>th</sup> March 2017

Dear Sir/Madam,

### **A303 Sparkford to Ilchester Dualling Scheme**

The Woodland Trust appreciates the opportunity to comment on the **A303 Sparkford to Ilchester Dualling Scheme**.

As the UK's leading woodland conservation charity, the Trust aims to protect native woods, trees and their wildlife for the future. Through the restoration and improvement of woodland biodiversity and increased awareness and understanding of important woodland, these aims can be achieved. We own over 1,000 sites across the UK, covering around 24,000 hectares (57,000 acres) and we have 500,000 members and supporters.

Ancient woodland is defined as an irreplaceable natural resource that has remained constantly wooded since AD1600. The length at which ancient woodland takes to develop and evolve (centuries, even millennia), coupled with the vital links it creates between plants, animals and soils accentuate its irreplaceable status. The varied and unique habitats ancient woodland sites provide for many of the UK's most important and threatened fauna and flora species cannot be re-created and cannot afford to be lost. As such, the Woodland Trust aims to prevent the damage, fragmentation and loss of these finite irreplaceable sites from any form of disruptive development.

The Woodland Trust **objects to both route options 1 and 2** on the basis of damage and loss to an area of unmapped ancient woodland, Annis Hill (grid ref: ST561256), and an area of wood pasture, Hazlegrove House parkland (grid ref: ST595259). Route option 1 is shown to bisect the southern section of Hazlegrove House parkland. Route option 2 follows a similar line through Hazlegrove House parkland, though also cuts through a section of the ancient woodland at Annis Hill.

Although Annis Hill is not mapped as ancient woodland on Natural England's Ancient Woodland Inventory (AWI) the woodland can be shown to be wooded as far back as at least the early 1800's. Further to this it has been identified as ancient woodland by Highways England, something confirmed in the technical documents accompanying the consultation and in direct correspondence with the Trust. As such we consider Annis Hill to constitute ancient woodland and will refer to it as such from here onwards.

## Planning policy

National Planning Policy Framework, paragraph 118, states that "planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of **aged or veteran trees** found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss."

Natural England's standing advice for Ancient Woodland and Veteran Trees<sup>1</sup> states: **"Trees and woodland classed as 'ancient' or 'veteran' are irreplaceable.** Ancient woodland takes hundreds of years to establish and is considered important for its wildlife, soils, recreation, cultural value, history and contribution to landscapes."

The Standing Advice further states:

"Impacts of development in an area of ancient woodland or veteran trees can include:

- damaging or destroying the trees or woodland
- damaging or killing veteran trees or parts of them
- damaging roots and soil, as well as the understory (all the vegetation under the taller trees)
- polluting the ground
- changing the woodland's water table or drainage
- damaging archaeological features or heritage assets

The Standing Advice then goes on to state:

"Impacts of development nearby can include these effects on the trees and woodland, and the species they support:

- compacting the soil around tree roots
- breaking up or destroying connections between woodland and other habitats
- reducing the amount of semi-natural habitats (like parks) next to ancient woodland
- changing the water table or drainage
- increasing the amount of pollution, including dust
- increasing disturbance to wildlife from additional traffic and visitors
- increasing light pollution
- increasing damaging activities like flytipping and the impact of domestic pets
- changing the landscape character of the area."

Natural England's standing advice regarding wood pasture and historic parkland states the following: "Ancient wood pastures and historic parkland can be a distinct form of ancient woodland. Many have not been included on the Ancient Woodland Inventory because their low tree density meant that they didn't register as woodland on historical maps. **Where ancient wood pastures are identified they should receive the same consideration as other forms of ancient woodland.**"

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<sup>1</sup> <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

Keepers of Time, a statement of Policy for England's Ancient and Native woodland jointly written by Defra and the Forestry Commission states that "the existing area of ancient woodland should be maintained and there should be a net increase in the area of native woodland." One of the objectives set out in Keepers of Time is to "take steps to avoid losses of ancient woodland and of ancient and veteran trees and to sustain the total extent of other native woodland (ensuring that gains exceed losses)."

Section 40 of the Natural Environment and Rural Communities Act 2006 requires all public authorities (including LPAs), in exercising their functions to have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity.

South Somerset District Council's Local Plan (adopted 2015) outlines the council's stance on protection of ancient woodland and ancient/veteran via 'Policy EQ6: Woodland and Forests', which states the following: "The loss of ancient woodland as well as ancient or veteran trees should be protected against loss wherever possible."

### **Impacts on ancient woodland**

Where route option 1 generally follows a similar route to the existing A303, route option 2 diverts northwards cutting through the lower corner of the eastern section of the Annis Hill ancient woodland.

Ancient woodland is irreplaceable and its loss cannot be mitigated for. Evidently this development would cause lasting, significant damage and impact on the integrity of the whole woodland. Any development that adversely impacts and results in the destruction of ancient woodland is highly inappropriate and in direct contravention of a number of national and local planning policies.

Development in ancient woodland can lead to long-term changes in species composition, particularly ground flora and sensitive fauna, i.e. nesting birds, mammals and reptiles. Majorly adverse impacts would occur as a result of the removal of valuable ancient woodland to make way for the construction of this proposal. Many indirect impacts are also likely to occur as a result, with dust, soil compaction, spillages and waste largely affecting the woodland, particularly during the construction phases. These impacts will largely be irreversible and permanent in their nature.

The production of dust is an inevitable part of construction activities. Flora within ancient woodland is particularly sensitive to dust. Dust deposition within the woodland will damage the ancient woodland on site and likely cause continual reduction of the habitat quality.

Traffic through/adjacent to ancient woodland will have a detrimental impact through a large increase in emissions. In the UK, nitrogen oxides are produced primarily by vehicle emissions. Increasing nitrogen can alter the outcome of competitive interactions, changing the character of woodland vegetation, largely in terms of species composition. There is evidence from woods across Britain that species increasing in cover are more likely to be associated with high nutrient status conditions. Some species have shown

consistent increases (e.g. nettle (*Urtica dioica*), rough meadow grass (*Poa trivialis*) and pendulous sedge (*Carex pendula*)) or decreases in abundance correlated with modelled nitrogen changes.

We also have serious concerns regarding the secondary impacts that the proposed new road would have on the rest of the road network in this area. It is often the case that new road schemes necessitate re-routing of existing roads with potential additional consequences for other areas of ancient woodland, in particular Steart Hill Copse, in close proximity to the local road network.

### **Impacts on wood pasture/ancient and veteran trees**

Historic parkland is a heritage asset. Priority wood pasture and parkland is valuable historically, biologically and culturally. Woodland soils are especially valuable where they have had a long history of minimal impact by people and have been largely undisturbed. Aged and veteran trees are a vital and treasured part of our natural and cultural landscape and heritage and increasingly recognised as a resource of great international significance. All trees are a material consideration in planning however there should be a presumption in favour of retaining trees of high quality (that make a substantial or significant contribution) to amenity and nature conservation.

Ancient and veteran trees are a vital and treasured part of our natural and cultural landscape. Ancient and centuries old veteran trees in the UK represent a resource of great international significance. Veteran trees are the ancient trees of the future and in turn notable trees are our future veterans. It has been estimated that the UK may be home to around 80% of Europe's ancient trees. They harbour a unique array of wildlife and echo the lives of past generations of people in ways that no other part of our natural world is able.

A 'veteran tree' is usually in the second or mature stage of its life and has important wildlife and habitat features including; hollowing, decay fungi, holes, wounds and large dead branches. It will generally include old trees but also younger, middle aged trees where premature aging characteristics are present.

Joint Nature Conservation Committee's (JNCC) UK Biodiversity Action Plan (BAP) Wood-Pasture and Parkland 2011 states the following:

"Wood-pasture and parkland are mosaic habitats valued for their trees, especially veteran and ancient trees and the plants and animals that they support... Specialised and varied habitats within wood pasture and parkland provide a home for a wide range of species, many of which occur only in these habitats, particularly insects, lichens and fungi which depend on dead and decaying wood. Individual trees, some of which may be of great size and age, are key elements of the habitat and many sites are also important historic landscapes."

It is clear that the siting of a new road through the wood pasture and historic parkland of Hazlegrave House would result in irreversible damage to these valuable habitats.

As wood pasture and historic parkland is often defined by populations of mature, veteran and ancient trees we believe that further surveys must be undertaken along both of the proposed route options to identify any possible unrecorded ancient or veteran trees. Further study of any identified ancient/veteran trees would also help to determine whether any of these specimens have good potential as habitats for rare wildlife.

### **Impacts on woodland and parkland wildlife**

Local faunal populations will also likely be affected by noise and light pollution generated from the development during its construction phase and also after completion. The loss and fragmentation of habitats will be an inevitable consequence of the development, and likely cause much stress to local populations, with potential impacts to wildlife in the wider environment of the area.

Noise associated with road developments and construction comes from a range of sources, including construction vehicles and high-level traffic activity. Noise levels will be elevated and likely remain constant over time. They are likely to limit the distributions of animal species that are intolerant of noise and negatively affect their reproductive success near to woodland edges. This may be beneficial at some sites if, as a result, deer pressure is reduced but bird diversity has been found to be lower in noisier sites.

Light pollution in construction areas may be generated from temporary lighting, vehicle lights and security lights, and includes chronic or periodically increased illumination, unexpected changes in illumination and direct glare. Artificial illumination reduces the visibility of the moon and the stars, affects species orientation differentially and may serve to attract or repulse particular species. This affects foraging, reproduction, communication, and other behaviour, consequently disrupting natural interactions between species. Light pollution near to ancient woodland is, therefore, likely to substantially affect the behaviour of species active during dawn and dusk, and twilight/nocturnal species, such as moths, bats, and certain species of birds, resulting in the decline of some species.

Ancient woodland and wood pasture host an abundance of invertebrates that provide good foraging for bats and birds. Mature and over mature trees often associated with these habitats are particularly important and have high potential attributed to cavities and deadwood within the canopies.

The road will result in fragmentation due to the physical gap it causes in the habitat features bats would follow. The impact of fragmentation will likely be exacerbated by artificial lighting that may line the route and deter bats. Should bats attempt to cross where they have previously done (despite the gap and any lighting) there is the risk of collision.

As well as the completed road resulting in fragmentation the construction phase will cause further losses of habitat due to the associated infrastructure and additional lighting. Considering the size of the area of wood pasture at Hazlegrove House there are likely to be a large number of mature, veteran and potentially ancient trees within the area that likely provide suitable roost sites or resting places for local bat populations. It is therefore

likely that there will be a number of adverse impacts to bat populations locally and also within the wider environment of the area.

## **Conclusion**

Ancient woodland and wood pasture are irreplaceable habitats; once lost they cannot be recreated. The Trust believes that any development resulting in damage or loss to an ancient woodland or wood pasture is unacceptable and that all possible measures should be explored in order to avoid these losses.

The Woodland Trust **objects** to both route options 1 and 2 on the basis of damage and loss to ancient woodland and wood pasture. We believe Highways England need to further explore other options to avoid these irreplaceable and valuable habitats. Furthermore it is apparent that further surveys need to be undertaken to determine whether there are any ancient or veteran trees within the site that have not been previously identified.

It is important that these two route options are reconsidered to ensure that the proposed scheme will not result in damage and loss to ancient woodland or wood pasture going forwards. These habitats are important in the context of the local environment and landscape and must be preserved.

We hope you find our comments to be of use to you. If you are concerned about any of the comments raised by the Woodland Trust then please do not hesitate to get in contact with us.

Yours sincerely,

Jack Taylor  
Campaigner – Ancient Woodland