

**APPENDIX D: RECORDS OF STAKEHOLDER CONSULTATION FEEDBACK
ON THE ISSUED SCOPING REPORT**

The AONB and EDDC comments on the Scoping report - Received 1st February 2016:

AONB	Landscape	NPA Responses
	<p>7.1.1 We support the idea of the study area allowing for the inclusion of sections further away from the existing corridor, as this may well offer the best solution in landscape terms rather than the limitations of a fixed corridor study. We would welcome further detail of the refinements to the study area through field investigation and consultation in due course.</p>	<p>The study area is being refined in parallel with the options identification work. It is the intention to advise consultees of the refined study area, together with landscape receptors and visual receptor groups, shortly.</p>
	<p>7.2.17 It is not clear to what degree the 'extent of visibility' relates to the current road route, or whether it takes account of the range of potential routes.</p>	<p>The 'potential visibility' described in paragraphs 7.2.12-7.2.17 draws on the zone of theoretical visibility for the existing road. The study area (as shown on the plan 16.3) is however wider than this to accommodate potential alternative route alignments.</p>
	<p>7.3.9 & 7.3.12 Although the information in 7.3.12 is more detailed, the difference between these two paragraphs is not clear. Workers, and visitors, at Otter Valley Ice Cream, Aplins Farm, should be included under 7.3.12.</p>	<p>Paragraph 7.3.9 sets out broad visual receptor groups eg, walkers, residents, road users. Paragraph 7.3.12 identifies preliminary named receptors. The two are intended to be complimentary, the second adding detail to the first. We will add workers and visitors to Otter Valley Ice Cream, Aplins Farm, to the list to the list of visual receptors in para 7.3.12.</p>
	<p>7.3.11 It would be compatible with the commentary under section 7.4 - Potential effects to sub-divide the landscape character types, to allow for a finer grain of landscape character assessment that may better reflect the special qualities and distinctive features of the AONB, and we would welcome this level of detail as being fundamental to help inform decisions on the scheme.</p>	<p>Local landscape character areas will be identified and mapped. It is the intention to advise consultees of this finer grain of character assessment shortly.</p>
	<p>7.5.4, 7.5.5 & 7.5.6 It is not clear what conclusions are being drawn here regarding the level of detail.</p>	<p>These paragraphs reflect current Highways England guidance on appropriate levels of assessment, with an emphasis on this being 'proportionate'. It is recognised that Stages 1 and 2 are for options selection and the level of detail used will be appropriate to be in a position to make robust decisions for that process.</p>

	<p>7.6.11 Confirmation and clarification of progress and ongoing timetable would be welcome.</p>	<p>The further work set out in 7.6.11 is currently being progressed. It is the intention to advise consultees of the refined study area, landscape and visual receptors and landscape sensitivity, in advance of the VM workshop in early March.</p>
<p>East Devon District council</p>	<p>Overall the landscape chapter of the Environmental Scoping Report sets out a robust approach to the EIA and addresses the correct and relevant information. However the following elements should be considered for further work:</p> <ol style="list-style-type: none"> 1. The scope of each option for appropriate mitigation and enhancements. 2. Cumulative assessment of new route alignment in relation to existing alignment. 	<p>Broad design principles are being identified for options together with mitigation/enhancement opportunities as part of the option selection process.</p> <p>The existing road will be considered as part of the baseline study. The treatment of the existing road will then be included in the assessments as part of each option considered as proposals will differ.</p>

From: "Panks, Stephen (NE)" <Stephen.Panks@naturalengland.org.uk>
Date: 5 February 2016 at 20:39:01 GMT
To: "Peter Chamberlain (peter.chamberlain@devon.gov.uk)" <peter.chamberlain@devon.gov.uk>
Cc: Dorothee Fitzsimmons <dorothee.fitzsimmons@devon.gov.uk>
Subject: **A30 Honiton to Devonshire Inn - Consultation on Environmental Scoping Report**

Dear Peter

As discussed please see below for Natural England's response to the above consultation.

1. What are the key issues of concern to you and has the Environmental Scoping Report adequately covered these?

The key issues for Natural England are landscape and protected species (inc bats) and designated sites. In the main these appear to have been adequately covered by the report at this stage. However please also see comments at Q3 re landscape methodology.

Re bats in particular the habitat quality in the area surrounding the road is a key issue in terms of the abundance of bat species and the potential impacts on the population. Also the report recognises the need for mitigation to be considered for some aspects but this does not appear to be discussed in the section on Nature conservation and biodiversity.

For bats it is important that if mitigation is deemed necessary that this needs to be planned and where possible undertaken ahead of road improvements. With regard to mitigation bat gantries have been shown to be relatively ineffective and green bridges are considered preferable if mitigation is necessary.

2. Is the defined study area for each environmental topic appropriate at this stage?

Yes.

Richard Green also asked for NE's view on screening for HRA sites, i.e., whether you can screen out impacts on European Sites and therefore don't need to consider these any further, given the distances from the site. This will require a bit more thought around how and what should be considered when coming to a screening opinion on the European sites, particularly as there are recorded sites for annex ii species within 2km and some species of bat travel large distances between roosts. However it is noted that the area is a considerable distance from the 3 SAC's and therefore I will take this particular element away and discuss internally and provide further comment on this shortly.

3. Are there any further relevant data or documents that we have not mentioned that you think we should take into account?

No. However with regard to landscape, whilst the scoping report does acknowledge other sources of guidance, there does appear to be a heavy dependence on IAN 135/10. For example para 7.6.5 states "IAN 135/10 is the main guidance document for the landscape and visual assessment. This will be followed in order to establish the landscape character baseline and visual baseline".

This is a little concerning as Para 7.6.3 of the Scoping report indicates that IAN 135/10 predates current national industry standard guidance for landscape and visual impact assessment contained within GLVIA 3 and recent updates to landscape character assessment guidance. Therefore given the importance of landscape issues Natural England considers that it is essential that this issue is properly considered against the most up to date guidance. It is also important that when used IAN 135/10 guidance will be appropriately supplemented by more up to date guidance. The Scoping report eludes to this being the case but in places such as para 7.6.5 (discussed above) it is not clear that this will be the case.

NPA Response

The methodology adopted and now explained more fully in the baseline report and that would be used for any subsequent assessment work, takes account of all of the more recent landscape and visual assessment guidance and updates and refines the approach identified in IAN 135/10, where appropriate.

In particular, we have refined the IAN methodology to more closely reflect current thinking with specific updates to the approach including:

- Consideration of susceptibility and value in reaching judgements about sensitivity;
- Preparing field character assessment forms as a record of the work used to inform the identification of Local Landscape Character Areas;
- The identification and consideration of visual receptor groups, including static and sequential effects;
- Consideration of cumulative impacts

The approach therefore includes refinements to accommodate more recent good practice whilst maintaining the general highways major road scheme approach to ensure compatibility with other highway projects.

4. Are there any additional environmental constraints or opportunities which we need to be aware of?

No

5. Is the proposed methodology/approach for ensuring that environmental considerations inform route selection clear and acceptable? If not, how could it be improved?

YES but please note the point about mitigation above.

6. Is it sufficiently clear what level of detail we will be presenting in the environmental appraisal of route options in due course?

YES

7. Is it clear how relationships between overlapping environmental topics will be handled (e.g. the interrelationship between landscape and visual impacts and the setting of heritage assets).

Yes

8. Are you aware of any existing or proposed developments which need to be addressed through the cumulative impact assessment?

Not at this stage.

Steve Panks
Lead Adviser – Devon Sustainable Development Team
Natural England
Level 9 Renslade House
Bonhay Road
Exeter
Devon
EX4 3AW
0300 060 0275