

# A358 Taunton to Southfields Dualling Scheme

Preliminary Environmental Information Report - Chapter 3
Assessment of Alternatives

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## 3 Assessment of alternatives

#### 3.1 Introduction

- 3.1.1 This chapter of the Preliminary Environmental Information (PEI) Report presents a summary of the alternative options which have been considered and the justification for the proposed scheme.
- 3.1.2 It should be noted that throughout Highways England's Project Control Framework (PCF) stage 3, the design has been developed to improve its performance. Many of these design changes are developments from the PCF stage 2 design and are not alternatives.
- 3.1.3 The Infrastructure Planning (Environmental Impact Assessment) (EIA)
  Regulations 2017 (the 'EIA Regulations') [1], in regulation 14 (18.d), require that
  "...a description of the reasonable alternatives studied by the applicant [must be
  provided], which are relevant to the proposed development and its specific
  characteristics, and [give] an indication of the main reasons for the option chosen,
  taking into account the effects of the development on the environment". This
  chapter provides a preliminary response to this requirement and will form the
  basis of an alternatives chapter to be included within the ES.

#### 3.2 Scheme history

- 3.2.1 The proposed scheme has been under consideration for over six years. It forms part of a programme of improvements planned along the A303/A358 corridor aimed at improving connectivity between London, the South-East and the South-West. The programme of improvements, as set out in the UK government's *Road Investment Strategy* (RIS) [2] made a commitment 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...".
- 3.2.2 Work on the project began in December 2014 [3], when the government announced funding to deliver improvements along the A303/A358 corridor starting with three schemes:
  - dualling the A358 between Taunton and Southfields roundabout on the A303
  - dualling the A303 between Sparkford and Ilchester
  - ongoing improvements on the A303 between Amesbury and Berwick Down
- 3.2.3 Funding for delivery of the proposed scheme was confirmed within the UK government's second *Road Investment Strategy* (RIS2) [4], published on the 11 March 2020, which covers the period between 2020 and 2025.

## 3.3 Assessment methodology

- 3.3.1 The process of options identification and route selection which led to the proposed scheme is summarised below. The process followed the following stages:
  - option identification, initial sifting and appraisal
  - options appraisal and sifting to identify options to take forward for further appraisal
  - the selection of the Orange option, which was taken to non-statutory public consultation in March to July 2017

- the selection of three options (the Orange option, the Blue option and the Pink option), which were taken to non-statutory public consultation in 2018
- the selection of a preferred route (Pink Modified option) which was announced by the Secretary of State (SoS) in June 2019 and which forms the basis of the proposed scheme

#### 3.4 Reasonable alternatives studied

- 3.4.1 The options appraisal process has been undertaken in line with Highways England's PCF, the early stages of which are summarised below:
  - PCF stage 0 strategy, shaping and prioritisation. Early initial high-level sifting appraisal to assess the viability of a long list of transport solutions to the problem identified.
  - PCF stage 1 options identification. A selected number of viable options are subject to further traffic, economic and environmental assessment and feedback sought by consultation.
  - PCF stage 2 options selection. The option designs, traffic modelling and economic and environmental assessments are refined following feedback from the consultation. At the end of this stage a preferred route announcement (PRA) is made.
  - PCF stage 3 preliminary design. The preferred route becomes the proposed scheme and this single option is developed to the required preliminary design level to allow full assessment and appropriate planning consent applications to be made.
- 3.4.2 For PCF stages 0 and 1, initial option sifting was undertaken in accordance with the *Transport Analysis Guidance The Transport Appraisal Process* or 'WebTAG' [5]. The sift used the *Early Assessment Sifting Tool* (EAST) [6], which forms part of the initial sifting of options. However, as EAST does not provide a numeric score, the assessment team produced a scoring mechanism to allow each option to be directly compared and ranked as described below. The scoring mechanism process followed after using EAST was developed in accordance with the *Transport Analysis Guidance*.
- 3.4.3 The PCF stage 2 option assessment methodology and conclusions are reported in the *A358 Scheme Assessment Report* [7] published as part of the PRA in 2019 [8]. A summary of the finding of this report is provided below.
- 3.4.4 A detailed description of all options considered is provided in Appendix 3.1 Route options stages 0-2 of this PEI Report, a summary of which is discussed below.
- 3.4.5 In PCF stages 1 and 2, a total of 28 options were assessed against the criteria presented in EAST as well as a series of criteria defined for the project to provide a wide range of options to consider. The options were roughly classified into three groups:
  - Central: option 2, option 2/2A, option 2/2B, option 2A/2B, option 2D, option 2/2D (with single carriageway 'Henlade Bypass), option 2/2D (with dual carriageway 'Henlade Bypass), option 2A/2D (with single carriageway 'Henlade Bypass), option 2A/2D (with dual carriageway 'Henlade Bypass), option 3, option 7, option 8, option 8/8A, option 8/8B, option 8A/8B, option 9, option 13, and option 16.
  - Northern: option 4, option 4/4A, option 11, option 11C, and option 12.
  - Southern: option 1, option 1/1A, option 1/1B, option 14, and option 15.

- 3.4.6 A two-stage assessment was undertaken, firstly against environmental constraints such as Area of Outstanding Natural Beauty (AONB), Site of Special Scientific Interest (SSSI), Scheduled Monuments and Ancient Woodland, and a second against more local criteria such as local air quality, noise and heritage. Further details of the assessment can be found in Appendix 3.1 Route options stages 0-2 of this PEI Report.
- 3.4.7 Of the options considered, the following were preferred and taken forward for further assessment:
  - Option 2A/2B
  - Option 8/8B plus works to junction 25 of the M5
  - Option 8/8B with north facing slips
- 3.4.8 These were renamed the Pink, Blue and Orange routes respectively. A description of each is given in Appendix 3.1 Route options stages 0-2 of this PEI Report.
- 3.4.9 The Pink, Blue and Orange options were subject to further traffic, economic and environmental assessment to help inform the 'preferred route' option. The environmental effects of each of these options is described in Table 3-3 in Appendix 3.1 Route options stages 0-2 of this PEI Report.
- 3.4.10 Consultation on a single option (the Orange option) was undertaken from March to July 2017 and a further consultation on all three options (the Orange option, the Blue option and the Pink option) was undertaken from January to February 2018. As a result of consultation, three further options were identified:
  - A combination route with elements from the original Pink and Orange options (Pink/Orange) – would be approximately 16km long between the M5 and Southfields.
  - A combination route with elements from the Blue and Orange options (Blue/Orange).
  - Ruishton and Henlade Parish Council proposed an option (named the Green option) this contaied elements of the Pink and Orange options, with a novel element between the A358/A378 junction at Mattock's Tree Green.
- 3.4.11 The methodology employed to appraise the Pink, Blue and Orange options from the 2018 consultation plus the three alternatives identified by consultees was based on the elimination process outlined in the *Design Manual for Roads and Bridges* (DMRB) and comparing option in pairs against the main categories of the Appraisal Summary Table (AST). The option with the least number of significant advantages was eliminated. The remining option was taken forward for comparison with the next option.
- 3.4.12 The Pink option performed significantly better than the Blue and Orange options in the elimination process in terms of economics and landscape and was the most favourable option. All other options were compared to the Pink option to establish if the options identified as part of the consultation process offered benefits greater than the best performing option (Pink).
- 3.4.13 The Pink option performed significantly better than the Blue/Orange, Pink/Orange and Green options in the elimination process in terms of economics and landscape. All three options were more expensive than the Pink option and caused more significant environmental damage. Where these options did perform better than the Pink option, the differences were not considered to outweigh the economic and landscape advantages of the Pink option. Therefore, all three of

- the options identified by consultees at the 2018 consultation (i.e. Blue/Orange, Pink/Orange and Green) were not taken forward. Further information is provided in Table 3-4 of Appendix 3.1 Route options stages 0-2 of this PEI Report.
- 3.4.14 Re-assessment of scheme costs and risks (to accommodate for further design developments, the change in the scheme delivery programme for the 2018 consultation and the delayed opening year for the scheme) resulted in two of the proposed route options (Pink and Blue) exceeding the budget. Further work was therefore taken to review the updated costs and deliver a route option within the budget, whilst still in compliance with the RIS and RIS2 objectives.
- 3.4.15 The Pink option was the most expensive option, but as the best performing of the three options and the option attracting strongest support from the 2018 consultation, it was therefore trialled for modification to reduce the cost. Further modifications were therefore made to produce the 'Pink Modified' option
- 3.4.16 The Pink Modified option takes a similar route to the Pink option for the majority of the alignment. This option follows a single alignment from Southfields roundabout on the A303 combining elements of on-line and offline works to connect into junction 25 on the M5, and retaining the bypass at Henlade. It also responds to the public feedback concerning the impact that these junctions and the road inbetween, might have on homes, public open space and the countryside. A more detailed description is included in Appendix 3.1 Route options stages 0-2 of this PEI Report and the PCF stage 2 *A358 Environmental Assessment Report* (EAR) [9].
- 3.4.17 The Pink Modified option was announced as the preferred route in June 2019 [10].

## 3.5 Justification for chosen option

- 3.5.1 The Pink Modified option meets the proposed scheme objectives, was more affordable and reduces the impact on the countryside. The scheme objectives are met as follows:
  - Employment The Pink Modified option provides direct access to Nexus 25 from the east, as well as connecting to the A378. This would help Taunton to become a more attractive place to work and do business by the local population and helps facilitate growth in Somerset and the South-West and along the A303/A358/A30 corridor.
  - Housing The Pink Modified option will facilitate growth in housing at key development hotspots along the corridor.
  - Capacity The Pink Modified option would provide relief to the traffic congestion in Henlade. The average daily traffic would reduce from 33,500 vehicles to 4,000 vehicles in 2038. By reducing congestion and increasing capacity it would allow mile-a-minute travel as the norm along the new A358.
  - **Resilience** The new road offers connection between the new A358, Nexus 25 development and M5 junction 25. This will help reduce congestion between West Hatch and M5 junction 25.
  - Safety The new A358 would see the existing road junctions and private accesses closed with new connections and junctions provided, making journeys safer by avoiding conflicting traffic-turning movements. The scheme would also improve safety by encouraging road users to use the new A358, rather than seeking alternative local routes to avoid congestion into Taunton.

- Existing walking, cycling and horse-riding provision would also be enhanced and improved.
- Connectivity Connectivity to the South-West from the South-East and London would be improved, making Taunton and the South-West region more accessible. Daily travel for commuters and local traffic into Taunton would be safer and more reliable, by separating local movements from traffic passing through the area.
- **Environment** The Pink Modified option avoids the Ancient Woodland at Huish Copse and at Stoke Wood and removes the need to impact the open space.
- Severance The Pink Modified option would provide new connections to the A358, providing safer replacement routes for local communities. Existing walking, cycling and horse-riding provision would also be enhanced and improved.
- Quality of life The Pink Modified option would allow local traffic using the A378 to connect with the upgraded A358 at Mattock's Tree Green junction, improving local journeys into Taunton. The reduction in traffic congestion at Henlade would improve residents' quality of life.
- 3.5.2 The Pink Modified option was, therefore, announced in June 2019 as the preferred route to be taken forward for PCF stage 3 as it meets the proposed scheme objectives, is more affordable and reduces the impact on the countryside.

#### 3.6 Further amendments to the preferred route

#### **Option appraisals**

- 3.6.1 During the early stages of PCF stage 3, the scheme has undergone further consideration of options into specific design elements along the preferred Pink Modified route in collaboration with the wider scheme team.
- 3.6.2 Table 3-1 provides a summary of the option appraisals undertaken to date on key features of the preferred route, where the 'original' option forms the 'baseline' to which the other options were compared. The option appraisals that were undertaken include:
  - M5 junction 25 southbound off-slip
  - Stoke Road link
  - Mattock's Tree Green junction
  - Scout camp link
  - Village Road link (north)
  - Bickenhall Lane link
  - Stewlev link
  - Ashill junction
  - Village Road link (south) and Capland link
  - Broadway Street link
  - Southfields link
- 3.6.3 The appraisal of options considered a range of criteria, not only environmental. These included scheme objectives, technical issues for highways, structures, drainage and earthworks, maintenance and operational issues, buildability, cost, existing commitments, health and safety and carbon. The preferred option was taken on a balance of outcomes.

- 3.6.4 The appraisals, based on professional evaluation, used the following ranking methodology to compare options with the original (baseline) design of the preferred route:
  - Major adverse: -2 (significantly worse than the baseline)
  - Moderate adverse: -1 (worse than the baseline)
  - Neutral: 0 (no better/worse than the baseline)
  - Minor beneficial: +1 (better than the baseline)
  - Major beneficial: +2 (significantly better than the baseline)
- 3.6.5 Further information on the option appraisals is provided in Appendix 3.2 Option appraisals of this PEI Report. For the purposes of the PEI Report, only the individual scores for each environmental aspect and the overall score is provided.

 Table 3-1
 Summary of options appraisals

Number of additional options	Description of baseline/original	Description of preferred option	Reasons for choice	Appendix 3.2 ref.			
Stoke Road	Stoke Road link						
	The A358 main carriageway would pass between Henlade to the north and Ruishton to the south and would cross Stoke Road. The baseline option would have the A358 dual carriageway in an 8m deep cutting with Stoke Road passing over. The baseline option did not fully consider the length of affected carriageway either side of the proposed overbridge and identified minimal impact on access to adjacent properties. The baseline option adversely impacted two properties, Henlade Farmhouse and Meadow View. Both were subject to blight applications which have been accepted by Highways England. The properties would be demolished in both the baseline and two options.	Option 2. This would be an offline option whereby the proposed Stoke Road overbridge would be located approximately 20m west. The realignment would allow the proposed Stoke Road embankments to be provided without encroaching on adjacent properties to the east of Stoke Road and maintain access. Additional land would be required to the west of the existing Stoke Road.	Access, health and safety, wellbeing, construction	Table 3-1			
M5 junction 2	25 southbound off-slip						
	Capacity improvements at M5 junction 25 including widening of the existing southbound off-slip from three to four lanes on the off-side approach over a length of approximately 120m. A retaining wall would retain the existing embankment between the slip and M5 southbound carriageway.	Original. As per previous.	Environment, construction, highways, geotechnics, drainage	Table 3-2			
Ashill junctio	Ashill junction						
	A new 2-level junction with slip roads to accommodate traffic movement in all directions, is proposed at Ashill between the village of Ashill to the west and Rapps and Ilton to the east.  The position of the new junction would be located directly over the existing at-grade major/minor junctions, with the proposed bridge sitting directly above the existing western junction (access/egress)	Option 2. It proposes that the junction position would stay in a similar location to the baseline option but the overbridge would move about 10m south so that it sits between both existing at-grade junctions. Copse Lane would also be upgraded heading northwards to reconnect Park Barn Lane properties and emergency access to Merryfield Airfield.	Arboriculture, construction, traffic, residents	Table 3-3			

Number of additional options	Description of baseline/original	Description of preferred option	Reasons for choice	Appendix 3.2 ref.
	for Ashill). A little further to the east is Copse Lane, an existing private track, which would be upgraded to provide access to Park Barn Lane properties and emergency access to the Merryfield Airfield to the north.			
Bickenhall La	ane link			
	The baseline option would provide a new bridge (A358 eastbound carriageway) over Griffin Lane at Ch 6+600, infill (or demolish) existing agriculture underpass (3m x 3m) at Ch 7+075, construction of a new Hatch Park underpass (8m x 5m) at Ch 7+100 and closure of the existing Bickenhall Lane staggered junction at Ch 7+600.	Option 3. A new road link with bridge over A358 at Ch 7+350, comprising a new 6.0m wide single carriageway road link joining Bickenhall Lane to Staple Fitzpaine Road approximately 780m long. This option would also include: a new overbridge, removal of new Hatch Park underpass; extension of existing agricultural underpass and upgrade to private access to Hatch Park estate from Griffin Lane.	Community, construction, land- take	Table 3-4
Broadway St	treet link			
	The current junctions of Broadway Street/Cad Road with the A358 would be closed. Access to, from and across the A358 would be made via the new Ashill split-level junction with slips.  During community forums, concerns were expressed about the severance caused by the proposed scheme and the significant need for access to local businesses and employment opportunities at Ilton.	<ul> <li>Option 2. It would provide a new link road parallel to the westbound carriageway, connecting Broadway Street to the proposed Ashill junction via Ashill Road. Main features:         <ul> <li>Approximate total length is 1500m.</li> <li>Approximately 6m wide single carriageway</li> <li>Existing vegetation along the new link would be lost</li> </ul> </li> <li>No bridge crossing over the A358 although a new drainage structure would be required under the link road for Cad Brook</li> </ul>	Community, connectivity	Table 3-5
Village Road	l link (south) and Capland link			
	In accordance with the requirement to provide GD 300 Level 2 compliance, all at-grade junctions along the A358 are proposed to be closed by the proposed scheme.	Option 2. This option would be a development of Option 1 with the Village Road Overbridge moved approximately 250m west, further away from the properties along the existing Village Road.	Residents, earthworks, land acquisition	Table 3-6

Number of additional options	Description of baseline/original	Description of preferred option	Reasons for choice	Appendix 3.2 ref.
	Access to Stewley and Capland is currently made from Capland Lane and Stewley Lane and the closure of these lanes with the A358 would require access via the proposed Village Road overbridge or Stewley Link (both accessed via Ashill junction). Journeys using these local lanes are longer and it has been reported that Stocks Lane is susceptible to flooding. There is therefore a risk during flood events that residents may be temporarily isolated from the wider road network.  For Village Road Overbridge it has been concluded that the PCF stage 2 design would feature embankments that would impact the properties on the existing Village Road both visually and could result in blight and additional land acquisition.	The topography at the revised overbridge location is more favourable and results in the approach embankments being lower and shorter, reducing visual impact in the nearby properties.  The proposed scheme boundary would retain the area required for Capland link (connecting Capland Lane with Village Road) in case this is implemented at a later stage. This decision is to be considered for the ES.  The proposed scheme boundary currently includes sections of Stocks Lane near Frog Street and Capland Lane junctions for potential local flood mitigation works, if Capland link is not implemented at a later stage.		
Mattock's Tr	ee Green junction			
3	A new 2-level junction with slip roads to accommodate traffic movement in all directions, is proposed at Mattock's Tree Green / A378. The proposed Mattock's Tree Green junction would be a grade separated junction, located to the east of Henlade village. The junction features a dumbbell roundabout configuration with an overbridge that would connect the two roundabouts and the A358 alignment would be in a deep cutting. No access was provided in the preferred route to the 'The Thatch' property.  Technically there are design concerns with the baseline design as the vertical alignment would not tie into the existing topographical survey before the existing non-listed bridge on Ash Road.	Option 3. The dumbbell arrangement and overbridge have been relocated slightly north as per Option 1. The Ash Road link from the southern roundabout ties in between the two existing bridges, which would not need to be demolished. This option would allow access provision to the existing Ashe Farm, the listed property (The Thatch), Ashe Farm camp site and container yard / business (Eclipse Event Solutions) with only minor junction / access modifications. No other existing properties would be affected by this option.  To address concerns regarding the proposed battered slopes encroaching with the listed bridge there may be a need to consider retaining solutions as part of design development.	Demolition, highways design, access, structures, public rights of way, residents, construction health and safety	Table 3-7

Number of additional options	Description of baseline/original	Description of preferred option	Reasons for choice	Appendix 3.2 ref.
1	West Hatch Lane junction would be stopped up at the A358 as part of the proposed scheme. A new link from West Hatch Lane would provide access to the Somerset Progressive School, scout camp and local business in the area.  • Length of link = 650m  • Single carriageway roadway with width = 6m minimum  The baseline route passes through the car park of Somerset Progressive School.	Option 1. It would provide a direct link from the proposed Mattock's Tree Green junction southern roundabout.  • Length of link = 700m  • Single carriageway roadway with width = 6m minimum.	Community, connectivity, road safety	Table 3-8
Southfields I	ink			
1	The PCF stage 2 scheme design does not provide access to large portions of farmland between Ashill junction and Southfields roundabout.	<ul> <li>Option 1. It would provide access to farmland by a new access-way running to the north-east of the A358.</li> <li>Length approx. = 1km</li> <li>Width of accessway = 3.5m</li> <li>The access-way would further provide access for maintenance to drainage attenuation/storage ponds.</li> <li>Not surfaced/unbound.</li> <li>Follows natural ground levels typically.</li> </ul>	Accessibility, Community	Table 3-9
Stewley link				
1	The baseline option would provide a road link from Stewley Lane to Ashill Road via a new overbridge over the A358. This was called Kenny link and would also include a new accessway to the sewage treatment works.  • Length of link = 0.8km. • Single carriageway road 6m minimum width.	Option 1. Option 1 would omit the Kenny link and instead provide a new link (east of the proposed scheme) to connect Stewley Lane with Ashill junction. It would also connect to Park Barn Lane which would remove the requirement to upgrade Copse Lane as part of the Ashill junction proposals.  • Length of link = 2,300m.  • Single carriageway road 6m minimum width.  • No bridge structure proposed.	Access, Drainage, Earthworks, Construction, Carbon	Table 3-10

Number of additional options	Description of baseline/original	Description of preferred option	Reasons for choice	Appendix 3.2 ref.
Village Road	l link (north)			
1	All at-grade junctions along the A358 would be closed by the proposed scheme. This includes Village Road which forms a junction with the existing A358 and provides access to the villages of Hatch Beauchamp, Stewley and Capland. The baseline option provides no access from Mattock's Tree Green junction to Village Road. Instead, road users would access the local villages via A378 and Meare Green Lane which is approximately 2.5km longer and would have to use of narrow single-lane roadways with limited passing opportunities.	provide a direct link to the village of Hatch Beauchamp from Mattock's Tree Green junction, via Village Road. The vertical alignment largely follows existing ground levels and would require minimal earthworks.	Community, road safety.	Table 3-11

#### Other design amendments

- 3.6.6 There are three further design changes that have been made since PCF stage 2 which have not been subject to an options appraisal as they are considered design development. These are:
  - Improvements to Nexus 25 roundabout
  - Omission of retaining walls at Stoke Road overbridge
  - Provision of a segregated left turn lane (SLTL) between the A358 and A303 eastbound at Southfields roundabout
- 3.6.7 The PCF stage 2 design did not envisage any changes to the Nexus 25 roundabout, which was still in planning phase at that time. The roundabout has since been constructed and opened to traffic in April 2021. Further traffic modelling has shown that the current arrangement would not support the operational requirements of the proposed scheme. Therefore, capacity improvements would be required including:
  - widening of the existing roundabout to accommodate additional traffic lanes as well as to achieve compliant entry path radius / deflection where possible
  - widening of entry and exit roads to accommodate additional traffic lanes
  - removal of the segregated left-turn lane from the Nexus 25 development
- 3.6.8 The additional land take would result in a small additional loss of land and increase in hard surfaced area, although the improvements would occur within the existing highways boundary.
- 3.6.9 The PCF stage 2 design proposed a retained cutting to the east of Stoke Road to avoid the demolition of two properties located either side of the proposed A358 route on Stoke Road. The retaining structures would be costly, and would take an extended period to construct, making construction impacts on the adjacent properties lengthier. Blight applications [11] by the owners of both properties have been accepted by Highways England and the purchase of the Meadowview property completed in June 2021, with the purchasing of the other property currently in progress; following which they are proposed to be demolished. The demolition of these properties would remove the 'pinch point' at Stoke Road and provide more land for the proposed scheme. This would enable the provision of grassed earthworks cutting slopes and the retaining walls to be removed entirely.
- 3.6.10 The PCF stage 2 design stopped at Southfields roundabout with the widened A358 connecting directly into the roundabout; however, the PCF stage 2 A358 Scheme Assessment Report [8] acknowledged that a segregated left turn lane from the A358 eastbound to A303 eastbound could be provided subject to PCF stage 3 traffic modelling. Further traffic modelling has shown that the roundabout would perform better operationally by the provision of this segregated left-turn lane. The additional land take would result in a small additional loss of agricultural land, although most of the change would occur within the existing highways boundary.

## **Abbreviations List**

Please refer to PEI Report Chapter 17 Abbreviations.

# **Glossary**

Please refer to PEI Report Chapter 18 Glossary.

### References

- [1] Secretary of State, "Infrastructure Planning (Environmental Impact Assessment) (EIA) Regulations 2017 (SI 2017/572 HMSO)," HMSO, London, 2017.
- [2] Department for Transport, "Road investment strategy: 2015 to 2020," DfT, 2015.
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- [11] Highways England, "Your property and blight," 10 February 2020. [Online]. Available: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attach ment\_data/file/864535/BED19\_0151\_Your\_property\_and\_blight\_2020.pdf. [Accessed 22 July 2021].