

A303 Sparkford to Ilchester Dualling Scheme TR010036

Statement of Common Ground - South Somerset District Council's further comments of 24/05/2019 for Deadline 7.

Topic	Sub-section	South Somerset District Council Comment	Highways England Response	Status @:D5	SSDC's Position as @ 21/05/2019
Cultural Heritage	Effects on Hazlegrove Registered Park and Garden	<p>Bunds 6 and 7 Bunds 6 and 7 are not sufficiently high to screen HGVs, signage and lighting columns and will likely affect the character of the RPG. An environmental barrier with planting is proposed to screen the far southeast corner of the RPG. This is an important point in the RPG boundary as it aligns with the outward approach on the Hazlegrove drive.</p> <p>An environmental barrier in this prominent position would diminish the character and appearance of the RPG.</p> <p>The applicant should increase the height of Bund 6 and extend Bund 7, as a substitute to the proposed environmental barrier, in the detailed design scheme approved under Planning Requirement 12 of the DCO and the landscaping scheme approved under Planning Requirement 5 of the DCO.</p>	<p>Landscape cross sections through the bunds have been prepared and were submitted as part of the Deadline 4 submission (REP4- 018).</p> <p>The dDCO provides at Requirement 12 that the detailed design will be submitted to the Secretary of State for approval following consultation with the relevant planning authority and local highway authority. Under Requirement 4, details of that consultation (including changes sought and whether they have been made, and where changes have not been made why not), must be submitted along with the application for approval of the detailed design. The Secretary of State will therefore have the views of the Councils before him when making any decision on the detailed design.</p>	UNDER DISCUSSION	<p><u>Bund 6</u> With regards to Bund 6, SSDC and the Applicant has covered this matter at face-to-face and tele-conferences meetings. The Council acknowledges that there is a balance between the height and footprint of the bunds. A meaningful rise in the height of Bund 6 would require a substantial increase in its footprint, which would significantly increase the area of the RPG lost to the bund screening measures and increase its engineered appearance. The Council is content with the balance presented by the Applicant.</p> <p><i>(Change status to AGREED for Bund 6).</i></p> <p><u>Bund 7</u> With regards to the environmental barrier for the gap in Bund 7, SSDC's position remains as set out in the email from Nic Wall to Highways England on 29th April 2019. This was in response to additional planting being proposed on the RPG side of the environmental barrier as part of the non-material amendment. The response was as follows:</p> <p>"The sketch plan also includes additional semi-mature planting to the timber environmental screen in the south-east corner. All additional measures are welcomed but this is unlikely to provide an effective winter or low-level screen and will have no impact on the carriageway side of the barrier. The alternative suggestion of redesigning the drainage ditches to allow for an extension of Bund 7 is resisted by Highways England due to this being classed as a non-material change. Again, it's regrettable that the DCO application process and timeframes hinder a good and achievable outcome".</p> <p>It remains unclear why the drainage arrangement could not be redesigned so that the two culverts are moved to the east, thus allowing Bund 7 to be extended eastward, or why the proposed culverts could not be extended in length to allow an extension of Bund 7 overhead, or why an attenuation pond could not be included on the southside of the main carriageway to avoid the need for the culverts to the north.</p> <p>If an extension of Bund 7 is not technically feasible, the Council would wish to see a range of alternative screening measures considered. This would be in line with the Applicant's Deadline 6 Report proposal to investigate substituting the environmental barrier for Visual Receptors 27 and 28 (paragraphs 1.3.4 and 1.3.5 of REP6-007) and in line with the Issue Specific Hearing 5 request for alternative screening measures to be presented.</p> <p><i>(Retain status as UNDER DISCUSSION or change to NOT AGREED for Bund 7).</i></p>
Cultural Heritage	Effects on Hazlegrove Registered	Hazlegrove House RPG Restoration And Conservation Management Plans	If a Conservation Management Plan is prepared as part of the DCO it will only be able to address works which	UNDER DISCUSSION	SSDC's position on the need for a Conservation Management Plan was further set out in its Deadline 4 submission (REP4-037) on the Applicant's Deadline 3

Topic	Sub-section	South Somerset District Council Comment	Highways England Response	Status @:D5	SSDC's Position as @ 21/05/2019
	Park and Garden	<p>The Cultural Heritage ES identifies the design and mitigation measures proposed in response to the adverse effects on the Hazlegrove House RPG. These measures respond to individual issues but do not address the overall harm to the RPG from the permanent loss of approximately 14% of the RPG and further encroachment of the A303.</p> <p>Part of the mitigation includes for the reinstatement of parkland grazed grass land and specimen tree planting in the area which is currently arable farmland. However, the DCO does not include a historic landscape conservation management plan for this area or the remainder of the RPG. A conservation management plan for the whole RPG would help mitigate the permanent harm to the RPG. The Council requires a planning requirement in the DCO for the preparation and implementation of a conservation management plan for the RPG approved by Secretary of State in consultation with the local planning authority.</p>	<p>directly mitigate the scheme, rather than be a holistic document which allows for the long-term management of the complete RPG.</p> <p>Within row CH12 of Table 3.1 in the revised draft of the OEMP the following provisions have been put in place; "The landscape scheme at Hazlegrove House RPG including screening, landscape planting, erection of fences, surfacing and appearance of the balancing pond should reflect the parkland character of the RPG. This includes location of planting and species to be used. The landscaping scheme including maintenance will be agreed with SSDC, The Gardens Trust and Historic England prior to undertaking any landscape works within the RPG."</p> <p>Highways England, as landowner, recognises the need to properly manage its assets and has committed to undertake a Conservation Management Plan for the RPG in its capacity as landowner. This will enable the whole of the RPG to be included within the Conservation Management Plan rather than only the work which will result in direct mitigation for the scheme. Highways England has prepared a memorandum of understanding and shared this with SSDC, demonstrating their commitment to undertaking a Conservation Management Plan.</p>		<p>Submission (REP3-003) under the heading of 1.7 Cultural heritage: Hazlegrove Conservation Management Plan.</p> <p>The Applicant has updated its position in its Deadline 6 response to ExQ3.1.5 (REP6a-002).</p> <p>SSDC has not identify any information in the Applicant's ExQ3 response to alter the Council's position.</p> <p>Furthermore, the Council notes that in its response to ExQ3.1.5 the Applicant states that <i>"it does not accept that a CMP is required as mitigation for the DCO scheme. The impacts from the scheme on the area within the Order limits are managed through the DCO already, particularly through the inclusion of mitigation set out in Table 3.1 REAC within the OEMP (REP5-013) (further details of the proposed mitigation are included in the response to 3.0.4 above). The Applicant therefore does not agree that the CMP should be secured in the DCO"</i>.</p> <p>The mitigation measures in Table 3.1: Record of environmental actions & commitments (REAC) amount to:</p> <p>CH7 Objection: Preservation by record of archaeological remains Action: measures in WSI.</p> <p>CH8 Objection: Preservation by record of archaeological remains Action: measures in WSI.</p> <p>CH10 Objection: Protect the character of Hazlegrove House RPG. Action: landscape scheme to reflect the parkland character of the RPG.</p> <p>None of these objectives address the fundamental harm to the RPG, as outlined in SSDC's Deadline 4 comments, i.e.:</p> <ul style="list-style-type: none"> • Loss of 14% (10.6 ha) of the designated RPG parkland and woodland. • Loss of historic features including driveways, earthworks, copse, historic boundary demarcation, and a veteran tree. • Introduction of highway water management infrastructure on 4% (3.1 ha) of the RPG. • Harm to the setting of the remaining RPG and listed Hazlegrove House through loss of parkland and the closer proximity of the trunk road. <p>(Change status to NOT AGREED).</p>
Cultural Heritage	Mitigation	<p>Howell Hill Stone Boundary Wall</p> <p>A Camel Stone boundary wall exists on the east side of Howell Hill. This is a locally distinctive feature of heritage and landscape value. The boundary wall should be retained through either its repair or retention on its current alignment or its rebuilding on the alignment of the revised boundary to the Howell Hill carriageway. There is no reason for any of the wall to be lost. The top of Howell Hill will be realigned</p>	<p>The northern 50 metres of the wall will be removed to make way for the permanent works. However it will be possible to set the stone aside for reuse elsewhere on the scheme. This action has been included in the Outline Environmental Management Plan. The middle 35 metres section will need to be removed temporarily to make way for the earthworks haulage route. The wall will be reinstated along its existing line following completion of</p>	UNDER DISCUSSION	<p>SSDC notes the following commitment from the Applicant in commitment CH2 of Table 3.1: Record of environmental actions & commitments (REP5-013):</p> <p>"Objective: Protection and reinstatement of heritage asset during construction (Howell Hill stone boundary wall).</p> <p>Action: Where Howell Hill stone wall (a linear feature forming the eastern boundary to the highway) is removed to make way for permanent works related to the scheme, stone will be set aside to be reused in construction of the scheme. The location and method of construction will be decided in consultation with SSDC. Recording of the length of wall to be removed will be carried out in line with the methodology set out in the OHWSI.</p>

Topic	Sub-section	South Somerset District Council Comment	Highways England Response	Status @:D5	SSDC's Position as @ 21/05/2019
		to form a gentle bend, allowing for sufficient length to rebuild the full length of the wall on the new boundary of the highway, replacing the proposed fence.	the earthworks. The southern 25 metres section will be retained in situ. The extent that is to be removed has been identified in the Outline Heritage Written Scheme of Investigation for a level 2 building recording prior to demolition.		<p><i>Where the wall is to be removed for temporary works during construction it will be reinstated in the same location. The method of reconstruction will be decided in consultation with South Somerset District Council</i>".</p> <p>Whilst the Council acknowledged movement on this matter, it does not consider the wording of the 'Action' to be sufficient to ensure the reconstruction of the lost length of stone wall.</p> <p>The Council suggests Commitment CH2 is amended to read:</p> <p>Action: Where Howell Hill stone wall (a linear feature forming the eastern boundary to the highway) is removed to make way for permanent works related to the scheme, stone will be set aside to be reused <i>to reconstruct the same length of stone wall on the realigned carriageway</i>. The location and method of construction will be decided in consultation with SSDC. Recording of the length of wall to be removed will be carried out in line with the methodology set out in the OHWSI.</p> <p><i>(Retain status as UNDER DISCUSSION or change to NOT AGREED).</i></p>
Landscape	Design and mitigation measures	<p>Visual Receptors Nos. 14 and 17 (Green track of Slate Lane)</p> <p>The scheme will bring the Steart Hill Link and Downhead Junction Link roads in close proximity to Slate Lane and introduce an extensive belt of screen planting in the foreground. This linear belt of planting will not only screen the realigned A303 and its link roads but also remove all opportunities to appreciate the long distance views of the vast undulating landscape to the south. This permanent effect is not assessed in the impact schedules. For VR No. 14 there is no assessment on the effects on the vast, long distance view for the 15-year period once the extensive screen planting is established. For VR No. 17 there is no assessment of the long distance views during operation.</p> <p>The Council requires the reassessment of VR No. 14 and VR No. 17 with an assessment of the effects from the loss of the vast, long distance view for the 15-year period. The inclusion of measures for retaining long distance panoramic views from Slate Lane in the detailed design scheme approved under Planning Requirement 12 of the DCO and the landscaping scheme approved under Planning Requirement</p>	A review of visual receptor nos. 14 and 17 has been undertaken and is documented within Appendix E of the Deadline 4 Supporting Information (REP4-018). The assessment conclusions for visual receptors 14 and 17 remain the same.	UNDER DISCUSSION	<p>SSDC made further comments on this matter in its response to ExQ2.5.6 in Deadline 5.</p> <p>The Applicant's Deadline 6 Report (paragraphs 1.3.2 and 1.3.3 of REP6-007) includes for the addition of Commitment L5 to Table 3.1: Record of environmental actions and commitments (REAC) of the OEMP.</p> <p>The Council is supportive of Commitment L5.</p> <p><i>(Change status to AGREED).</i></p>

Topic	Sub-section	South Somerset District Council Comment	Highways England Response	Status @:D5	SSDC's Position as @ 21/05/2019
		5 of the DCO are sought. The review of the visual receptors in Appendix E of the Applicant's Deadline 4 Supporting Information (REP4-018) acknowledges the loss of the long distance views from VR Nos. 14 and 17. Whilst the gaps are few and intermittent, the stunning views they afford are, thus, all the more dramatic. They share a relationship with the otherwise enclosed nature of PRoW and are the outstanding element of the experience. It is at these locations that receptors are likely to pause or rest. The assessment of the effects on the visual receptors is considered to overlook this aspect.			
Landscape	Design and mitigation measures	<p>Visual Receptor No. 27 and 28</p> <p>The assessment of VR No.28 does not consider the harmful effect of an environmental barrier on the rural character of the farmstead setting. The applicant is asked to reassess VR No. 28 with consideration of the effects of an environmental barrier on the rural character and the inclusion of a bund instead of an environmental barrier in the detailed design scheme approved under Planning Requirement 12 of the DCO and the landscaping scheme approved under Planning Requirement 5 of the DCO. The review of the visual receptors in Appendix E of the Applicant's Deadline 4 Supporting Information (REP4-018) notes that the east end of the barrier will be visible from VR 28 until planting is established. Visual Receptor No. 27 and 28 are representative for the area. The presence of the barrier will impact on the perception of the rural character even if not always in view from these and other points. The Applicant acknowledges the unsuitability of environmental barriers to rural locations in its response to ExA's Q1 1.1.32: "Any additional barriers, such as fencing, will have an additional impact on setting as they will not reflect the rural character of the property". The Applicant's conviction that planting can effectively screen the barrier is not shared. The purpose of the barrier is</p>	<p>A review of visual receptor nos. 27 and 28 has been undertaken and is documented within Appendix E of the Deadline 4 Supporting Information (REP4-018). The assessment conclusions for visual receptors 27 and 28 remain the same.</p> <p>The dDCO provides at Requirement 12 that the detailed design will be submitted to the Secretary of State for approval following consultation with the relevant planning authority and local highway authority. Under Requirement 4, details of that consultation (including changes sought and whether they have been made, and where changes have not been made why not), must be submitted along with the application for approval of the detailed design. The Secretary of State will therefore have the views of the Councils before him when making any decision on the detailed design.</p>	UNDER DISCUSSION	<p>SSDC made further comments on this matter in its response to ExQ2.5.6 in Deadline 5.</p> <p>The Applicant's Deadline 6 Report (paragraphs 1.3.4 and 1.3.5 of REP6-007) includes for the addition of Commitment L6 to Table 3.1: Record of environmental actions and commitments (REAC) of the OEMP.</p> <p>The Council is supportive of Commitment L6.</p> <p><i>(Change status to AGREED).</i></p>

Topic	Sub-section	South Somerset District Council Comment	Highways England Response	Status @:D5	SSDC's Position as @ 21/05/2019
		supported. However, other means of screening that would be more in keeping with the rural character should be investigated, such as a stone-faced bund. The negative impact of a barrier on the rural character is not only important when experienced from the vicinity of Camel Hill Farm, but also for the perception of the area with travellers on the A303.			
Landscape	Design and mitigation measures	<p>Visual Receptor No. 38</p> <p>The assessment of the effects on VR No. 38 are challenged as it does not consider the adverse effect of an environmental barrier on the character of the RPG. The applicant is required to reassess VR No. 38 and extend Bund 7, as a substitute for the proposed environmental barrier, in the detailed design scheme approved under Planning Requirement 12 of the DCO and the landscaping scheme approved under Planning</p>	<p>The presence of the proposed fencing is mentioned in the assessment (see the Visual Baseline and Impact Schedules, APP-072). Proposed planting will screen this over time, and as such the fencing is only anticipated to be visible in early years. A review of visual receptor no. 38 has been undertaken and is documented within Appendix E of the Deadline 4 Supporting Information (REP4-018). The assessment conclusions for visual receptor 38 remains the same. The dDCO provides at Requirement 12 that the detailed design will be submitted to the Secretary of State for approval following consultation with the relevant planning authority and local highway authority. Under Requirement 4, details of that consultation (including changes sought and whether they have been made, and where changes have not been made why not), must be submitted along with the application for approval of the detailed design. The Secretary of State will therefore have the views of the Councils before him when making any decision on the detailed design. Requirement 5 of the DCO. The review of the visual receptor in Appendix E of the Applicant's Deadline 4 Supporting Information (REP4-018) notes that the environmental barrier would be visible in the short and medium term, but screened by Year 15. Additional planting is proposed for the early years subject to the position of highway elements. The effectiveness of the screen planting for all years is challenged due to the narrow width of</p>	UNDER DISCUSSION	<p><u>Assessment</u></p> <p>SSDC made further comments on this matter in its response to ExQ2.5.6 in Deadline 5 (Please note typographic error in this response for Visual receptor No. 35 rather than No. 38).</p> <p>The Council maintains this position.</p> <p><i>(Change status to NOT AGREED).</i></p>

Topic	Sub-section	South Somerset District Council Comment	Highways England Response	Status @:D5	SSDC's Position as @ 21/05/2019
			planting available in this area and the considerable gap in the planting from the drainage channels. What screen planting can be included would have a minimal impact during leaf fall for six months of the year. This is evident from established planting along the existing A303 in this area. The revised assessment of the effects on the visual receptors is therefore challenged as the barrier is considered to remain a visible feature. The Applicant acknowledges the unsuitability of environmental barriers to rural locations in its response to ExA's Q1.1.32: "Any additional barriers, such as fencing, will have an additional impact on setting as they will not reflect the rural character of the property". They are equally harmful for the special character of the RPG. The negative impact of a barrier on the rural character is not only important when experienced from the Hazlegrove Park but also for the perception of the area with travellers on the A303.		
Landscape	Design and mitigation measures	Visual Receptor No. 38 – Implementation For the reasons stated above, the proposed mitigation measures are not considered effective. The Council considers that appropriate measures would be to relocate the drainage ditches and culverts to the east and to extend Bund 7 to the east, thus removing the need for the environmental barrier. The views of the Council were shared at the Bristol meetings on 22nd March 2019, with a helpful response from the Applicant to look at redesigning this area as part of the outline plan.	The Applicant is currently exploring this.	UNDER DISCUSSION	<p><u>Mitigation</u></p> <p>With regards to appropriate mitigation measures, please refer to the SSDC's response to ExQ2.5.6 in Deadline 5 and to the Council's response on Bund 7 above.</p> <p><i>(Retain status as UNDER DISCUSSION or change to NOT AGREED).</i></p>

Nicholas Wall
South West Heritage Trust on behalf of South Somerset District Council
24th May 2019