

# A303 Sparkford to Ilchester Dualling Scheme TR010036

## 8.3 Statement of Common Ground with Historic England

APFP Regulation 5(2)(q)  
Planning Act 2008  
Infrastructure Planning (Applications: Prescribed  
Forms and Procedure) Regulations 2009  
July 2018



Infrastructure Planning

Planning Act 2008

**The Infrastructure Planning  
(Applications: Prescribed Forms and  
Procedure) Regulations 2009**

**A303 Sparkford to Ilchester Dualling  
Scheme**

Development Consent Order 201[X]

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**STATEMENT OF COMMON GROUND**

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<b>Planning Inspectorate Scheme Reference</b>	TR010036
<b>Application Document Reference</b>	8.3
<b>Author:</b>	A303 Sparkford to Ilchester Dualling Scheme Project Team, Highways England

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Rev 0	July 2018	Application Issue

**STATEMENT OF COMMON GROUND**

**This Statement of Common Ground has been prepared and agreed by (1) Highways England Company Limited and (2) Historic England.**

**Signed.....**  
**[NAME]**  
**[ROLE]**  
**on behalf of Highways England**  
**Date: [DATE]**

**Signed.....**  
**[NAME]**  
**[ROLE]**  
**on behalf of the Historic England**  
**Date: [DATE]**

## CONTENTS

<b>1.</b>	<b>Introduction .....</b>	<b>3</b>
1.1	Purpose of this document .....	3
1.2	Parties to this Statement of Common Ground.....	3
1.3	Terminology .....	3
1.4	Record of Engagement .....	4
<b>2.</b>	<b>Issues .....</b>	<b>7</b>

## **1. Introduction**

### **1.1 Purpose of this document**

- 1.1.1 This Statement of Common Ground ("SoCG") has been prepared in respect of the proposed A303 Sparkford to Ilchester Dualling ("the Application") made by Highways England Company Limited ("Highways England") to the Secretary of State for Transport ("Secretary of State") for a Development Consent Order ("the Order") under section 37 of the Planning Act 2008 ("PA 2008").
- 1.1.2 This SoCG does not seek to replicate information which is available elsewhere within the Application documents. All documents are available in the deposit locations and / or the Planning Inspectorate website.
- 1.1.3 The SoCG has been produced to confirm to the Examining Authority where agreement has been reached between the parties to it, and where agreement has not (yet) been reached. SoCGs are an established means in the planning process of allowing all parties to identify and so focus on specific issues that may need to be addressed during the examination.

### **1.2 Parties to this Statement of Common Ground**

- 1.2.1 This SoCG has been prepared by (1) Highways England as the Applicant and (2) Historic England.
- 1.2.2 Highways England became the Government-owned Strategic Highways Company on 1 April 2015. It is the highway authority in England for the strategic road network and has the necessary powers and duties to operate, manage, maintain and enhance the network. Regulatory powers remain with the Secretary of State. The legislation establishing Highways England made provision for all legal rights and obligations of the Highways Agency, including in respect of the Application, to be conferred upon or assumed by Highways England.
- 1.2.3 Historic England is the government's advisor for England's historic environment, responsible for protecting and championing the historic environment, and ensuring it is valued and understood.

### **1.3 Terminology**

- 1.3.1 In the tables in the Issues chapter of this SoCG, "Not Agreed" indicates a final position, and "Under discussion" where these points will be the subject of on-going discussion wherever possible to resolve, or refine, the extent of disagreement between the parties. "Agreed" indicates where the issue has been resolved.
- 1.3.2 It can be taken that any matters not specifically referred to in the Issues chapter of this SoCG are not of material interest or relevance to Historic England, and therefore have not been the subject of any discussions between the parties. As such, those matters can be read as agreed, only to the extent that they are either not of material interest or relevance to Historic England.

## 1.4 Record of Engagement

1.4.1 A summary of the meetings and correspondence that has taken place between Highways England and the Historic England in relation to the Application is outlined in Table 1.1.

Table 1.1: Record of engagement

Date	Form of correspondence	Key topics discussed and key outcomes (the topics should align with the issues tables)
22/02/2017	Site walkover of Hazlegrove House Registered Park and Garden (RPG) attended by Mott MacDonald Sweco Joint Venture, Historic England Inspector of Monuments and Historic England Landscape Architect.	The general character and heritage value of the RPG was viewed and discussed. An early iteration of the Hazlegrove Junction was also shared and discussed. Concerns were expressed by Historic England representatives regarding the amount of land to be taken from the RPG and the potential visual prominence of the scheme in the historic landscape.
20/07/2017 – 04/08/2017	Email correspondence between MMSJV and Historic England, Inspector of monuments.	Consultation regarding the specification for archaeological geophysical surveys. Historic England requested that additional survey work be carried out around the Camel Hill Scheduled Monument. Mott MacDonald Sweco Joint Venture adjusted to specification accordingly. Following a review of the revised specification Historic England noted no further comments.
07/12/2017	Site walkover of Camel Hill Scheduled Monument (SM) with Mott MacDonald Sweco Joint Venture and Historic England Inspector of Monuments.	<p>The extent of the SM was discussed along with the potential for the presence of associated archaeological remains outside the boundary of the monument. Concerns were expressed by the Inspector of Monuments of the potential for associated remains between the southern edge of the monument and the road.</p> <p>The position and orientation of the monument and how this contributes to the monuments heritage value was also discussed.</p>
07/12/2017	Environmental Technical Working Group (TWG) meeting attended by Historic England Inspector of Monuments and Historic England Landscape Architect.	<p>Design development and potential mitigation for the extent of the scheme was discussed.</p> <p>Focused discussion around impacts the Hazlegrove House RPG. A request was made by Historic England for a Statement of Significance to be prepared for the RPG to allow for a fully informed assessment.</p> <p>The potential requirement for land take from the Camel Hill SM was also discussed. The Inspector of Monuments responded with a strong no.</p> <p>To ensure a proportionate assessment it was suggested that a scoping exercise was undertaken to compile a list of heritage assets within the study area which would require a detailed assessment as part of the Environmental Statement (ES).</p>
12/02/2018	Environmental TWG attended by Historic England Landscape Architect.	<p>Design development and potential mitigation for the extent of the scheme was discussed.</p> <p>The findings of the statement of significance were presented and discussed. Further focussed discussion</p>

Date	Form of correspondence	Key topics discussed and key outcomes (the topics should align with the issues tables)
		on the impacts to Hazlegrove House RPG and mitigation considering the findings of the statement of significance and design development.
27/02/2018	Email from Mott MacDonald Sweco Joint Venture to Historic England Inspector of Monuments and Historic England Landscape Architect.	Draft Hazlegrove House RPG Statement of Significance circulated for comment alongside a request for any further suggestions to mitigate the potential harm to the RPG.
14/03/2018	Email to Mott MacDonald Sweco Joint Venture from Historic England Landscape Architect.	Response to email sent by Mott MacDonald Sweco Joint Venture on 27/02/18. Positive comments from the Landscape Architect over the depth of research and presentation of the document. Comments also provided on the content of the Statement of Significance and suggested amendments.
16 March 2018	Email from Mott MacDonald Sweco Joint Venture to Historic England Inspector of Monuments.	Circulation of TWG minutes of 12/02/18 and request for comments on list of assets to be scoped in for detailed assessment as part of the ES. Draft list of heritage assets to be scoped in for detailed assessment prepared in response to the request at the TWG meeting on 07/12/2018.
20 March 2018	Email from Historic England Inspector of Monuments to Mott MacDonald Sweco Joint Venture.	Email in response to email circulated by Mott MacDonald Sweco Joint Venture on 16/03/18. No comments regarding the assets to be scoped in and out. It was noted that there were a number of discrepancies and duplications which needed addressing.  Also raised the incorporation of assets outside of the study area in the assessment, including Cadbury Castle. The request for inclusion was based on the topography of the area and that this meant that impacts may be widely dispersed.
26/03/18	Email from Mott MacDonald Sweco Joint Venture to Historic England Inspector of Monuments.	Preliminary interpretation of geophysical survey results for information.
27/03/18	Email from Historic England Inspector of Monuments to Mott MacDonald Sweco Joint Venture.	Notes good results for the geophysical survey of the Camel Hill SM.
23/04/18	Email from Mott MacDonald Sweco Joint Venture to Historic England Inspector of Monuments	Specification for archaeological evaluation trenching circulated with request for comments.
18/05/18	Email from Mott MacDonald Sweco Joint Venture to Historic England Inspector of Monuments.	Request for comments on the repositioned northern haul road in relation to its proximity to the Camel Hill SM.
22/05/18	Conference call between Mott MacDonald Sweco Joint Venture and Historic England Inspector of Monuments.	Discussion on the repositioned haul route. Historic England requested that if top soil to be removed then trench evaluation should be undertaken. Historic England also noted the potential for compaction of archaeological remains which would need to be mitigated.

Date	Form of correspondence	Key topics discussed and key outcomes (the topics should align with the issues tables)
		<p>Discussion regarding the contents of the Statement of Common Grounds (SoCG).</p> <p>Agreement that submitting the Development Consent Order (DCO) prior to trench evaluation was acceptable providing findings of trench evaluation are submitted as additional environmental information and mitigation is undertaken based on these findings, and the local authority archaeological advisor is happy with the approach.</p>
22/05/18	Email from Mott MacDonald Sweco Joint Venture to Historic England Inspector of Monuments.	Copy of email from South West Heritage Trust (SWHT), who advise the local authority regarding archaeology, forwarded to Historic England. The email confirms that SWHT are happy with the approach of trench evaluation being undertaken after the DCO has been submitted.
22/05/18	Email from Mott MacDonald Sweco Joint Venture to Historic England Inspector of Monuments.	Email detailing potential issues to be included in SoCG for comment.
11/07/18	Site walkover of Hazlegrove House RPG with Mott MacDonald Sweco Joint Venture, Historic England Inspector of Monuments and Historic England Landscape Architect.	The walkover included the land around Hazlegrove School, the area of parkland to the south, the field currently used for arable farming, and the woodland on the south-eastern boundary of the RPG. Discussion was undertaken regarding the Conservation Management Plan, and the potential level of harm the scheme would cause to the RPG. Historic England noted that they would consider both points and respond.

1.4.2 It is agreed that this is an accurate record of the key meetings and consultation undertaken between (1) Highways England and (2) Historic England in relation to the issues addressed in this SoCG.



## 2. Issues

Topic	Sub-section	Historic England comment	Highways England response	Status
Cultural Heritage	Environmental Scoping Opinion	Study Area - it is our view that the 1km boundary set for the proposed study area is not sufficient to assess potential setting impacts on significant designated heritage assets lying beyond this limit and which may be visually affected by the proposed development. Chapter 8, Landscape and Visual Impact, acknowledges this likely interplay on prominent heritage assets such as South Cadbury Castle and St Michaels Hill (both Scheduled Monuments), but will assess impacts from the perspective of the amenity value to receptors rather than impact on heritage significance. We recommend that Cultural Heritage assessment takes the same approach as Landscape and Visual Impact assessment in identifying designated heritage assets beyond 1km from the centreline of the scheme whose settings may be affected by the development and that it undertakes appropriate assessment of the likely setting impact upon those assets.	The study area has been updated to include the 1km study area and designated assets identified outside of the 1km study area. These assets are Cadbury Castle, St Michael's Hill, Montacute, and Glastonbury Tor. As such the study area is now consistent with that requested in the scoping opinion.	<b>AGREED</b>
		Hazlegrove House Registered Park and Garden (RPG) - the scoping report notes the specific meeting held to consider how the scheme will impact upon this designated heritage asset. Detailed advice on assessment methodology was provided to the applicant, to draw out the history, development and thus significance of this designed landscape, in our formal response to non-	A Statement of Significance for Hazlegrove House RPG has been prepared to present the heritage value of the RPG and its component parts. The conclusions of the Statement of Significance regarding the heritage value of Hazlegrove House RPG, including its component parts, form a robust basis for the assessment of potential impacts the scheme will have on the	<b>AGREED</b>

Topic	Sub-section	Historic England comment	Highways England response	Status
		statutory public consultation dated 29th March 2017. As the impact upon the RPG is likely to be the most substantial heritage effect of the whole scheme, we are keen to see a robust assessment of the significance of this designated heritage asset so that informed advice can be provided to the applicant upon their emerging plans. It appears that there has been little investigation of this particular RPG by earlier researchers, so it is imperative that this cultural heritage assessment provides a solid understanding upon which to base advice.	heritage value of the RPG. It is included in the DCO submission as Appendix 6.2 of the Environmental Statement ( <b>document reference TR010036/APP/6.3</b> ).	
	Hazlegrove House RPG Statement of Significance	Phasing plan. We would like to see a schematic plan to show how the extent of the park has changed over time. This is relevant to Hazlegrove because although there is text about changes to the park, it's not represented graphically. It would show in an immediate and accessible way the relationship of the most southerly part of the park (proposed for the re-engineered A303) to the rest. It's inevitable that there may be some element of conjecture but as long as this is acknowledged then this should not present an issue.	A phasing plan has not been prepared as we feel the Statement of Significance is detailed enough to understand the historic development and heritage value of the park without the need for such a plan.	<b>AGREED</b>
		A short, sharp summary of the significance of the design of the park, pulling out its most significant phase(s), is required. In many Stewardship schemes it's the OS 1st ed. that's used as the basis for parkland restoration because it captures all the major phases of what, in many instances, is a palimpsest landscape. Were the OS 1st ed considered to depict the high point of the design of the park	A short summary of heritage value (significance) has been included as an Executive Summary in Appendix 6.2 Statement of Significance ( <b>document reference TR010036/APP/6.3</b> ).	<b>AGREED</b>

Topic	Sub-section	Historic England comment	Highways England response	Status
		at Hazlegrove, you would normally be proposing to reinstate the parkland trees in the most southerly fields.		
		Lidar tiles should be included as part of the evidence.	The interpretation of the lidar data including an annotated drawing and accompanying transcription is included in Appendix A of Appendix 6.2 Statement of Significance ( <i>document reference TR010036/APP/6.3</i> ).	<b>AGREED</b>
	Archaeological evaluation and mitigation	To inform design and mitigation archaeological evaluation should be undertaken by way of intrusive and non-intrusive surveys.	The method of archaeological evaluation using geophysical surveys and trial trenching evaluation, as set out in the geophysical survey specification and trial trenching specification, is appropriate to understand the potential impact of the scheme on archaeological assets and develop an archaeological mitigation strategy.	<b>AGREED</b>
			The level of information currently regarding archaeological assets, based on HER data and remote sensing, is sufficient to prepare the DBA and ES for DCO submission with findings of geophysics and trench evaluation, along with an updated assessment of impacts to archaeology, to be submitted as soon as possible during the DCO process as additional environmental information. The trench evaluations will be undertaken in line with the Written Scheme of Investigation (WSI).	<b>AGREED</b>
	Hazlegrove junction	The amount of land to be taken from the RPG for the Hazlegrove Junction and Hazlegrove School access, and the potential visual prominence of the scheme in the historic	The design development of Hazlegrove Junction has reduced the seriousness of the impact on the RPG and setting of Hazlegrove House.	<b>UNDER DISCUSSION</b>

Topic	Sub-section	Historic England comment	Highways England response	Status
		landscape will significantly harm the heritage value of the RPG and the setting of Hazlegrove House.		
		Can views from Hazlegrove House be improved by screening Camel Hill Services?	Camel Hill services will be obscured in key views from the front Hazlegrove House and the formal gardens once the proposed landscape planting has matured.	<b>UNDER DISCUSSION</b>
		The intersection between the historic driveways and historic lane (now footpath), should be kept within the retained woodland.	The retention of this feature is being investigated to see whether it is possible to retain all or part of the intersection within the scheme.	<b>UNDER DISCUSSION</b>
	Camel Hill Scheduled Monument (SM)	The scheme should not encroach on the footprint of the SM.	The scheme has been designed so that it does not encroach on the footprint of the scheduled monument both during construction and operation. A buffer zone around the monument will be established and protection fencing will be erected to ensure no accidental damage to the monument during construction. As such the scheme will not encroach into the scheduled monument.	<b>AGREED</b>
		The location of the haul route to the north of the SM has the potential to remove or compact remains associated with the monument.	Geophysics and a trench evaluation will be carried out within the footprint of the temporary haul route to establish the potential for archaeological remains. Any archaeological mitigation will be based on the findings of this evaluation and will be included in the Written Scheme of Investigation (WSI) to be submitted as additional environmental information during the DCO process.	<b>AGREED</b>

Topic	Sub-section	Historic England comment	Highways England response	Status
			<p>The haul route around Camel Hill SM would be raised by the installation of geotextile membrane prior to the placement of temporary granular infill. This would be over the existing ground and would not require vegetation clearance. During operation the haul roads would be regularly inspected at intervals agreed with the local planning authority to ensure that the haul roads do not increase the potential for damage, removal, or truncation of archaeological remains. As such the impact on any remains associated with the SM will be fully mitigated in line with national and local planning policy.</p> <p>These mitigation aspects have been detailed within the <b><i>Outline Environmental Management Plan (document reference TR010036/APP/6.7)</i></b>.</p>	
	Downhead SM	The ecological mitigation area to the east of Downhead SM should be designed as to not impact on any associated archaeological remains or on the setting of the scheduled monument.	During the construction of the scheme, a reptile capture and translocation period is required so as to move reptiles out of the area of works. A reptile receptor site has been identified for captured individuals and is located greater than 400 metres to the north of the A303. It is located north east of Downhead Manor Farm, and comprises tussocky calcareous grassland, scrub, hedgerows and grazed grassland, forming a mosaic of habitats. The receptor site would be enhanced through:	<b><i>UNDER DISCUSSION</i></b>

Topic	Sub-section	Historic England comment	Highways England response	Status
			<ul style="list-style-type: none"> <li>• The installation of 2 hibernacula, one to the north and one to the south</li> <li>• Fencing off the northern area from sheep.</li> </ul> <p>No compaction, disturbance to soils or excavation works would be required to facilitate this ecological mitigation.</p>	
	EIA Assessment methodology	No comments with regard to whether any of the assets on the scoping list in Appendix B of the Cultural Heritage Desk Based Assessment (DBA) [Appendix 6.1 of the Environmental Statement, ( <b>document reference TR010036/APP/6.3</b> )] should be scoped in or out. However, there are minor errors and inconsistencies which should be addressed.	Scoping list has been reviewed and errors and inconsistencies addressed in Appendix 6.1 Cultural Heritage DBA ( <b>document reference TR010036/APP/6.3</b> ).	<b>AGREED</b>

