

**From:** [REDACTED]  
**To:** [A303 Sparkford to Ilchester](#)  
**Cc:** [REDACTED]  
**Subject:** Sparkford DCO - Written Representations and Responses to Examiner's Questions  
**Date:** 23 January 2019 18:14:51  
**Attachments:** [A303 Sparkford\\_HBMCE Responses to Examiners Questions.pdf](#)  
[A303 Sparkford\\_HBMCE Summary of Written Representations.pdf](#)  
[A303 Sparkford\\_HBMCE Written Representations.pdf](#)  
[A303 Sparkford\\_HBMCE Appendices to Written Representations.pdf](#)

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Dear Sir/ Madam,

**Application by Highways England for an Order Granting Development Consent for the A303 Sparkford to Ilchester Dualling**

**Reference: SPIL-SP0005 and 2001-4933**

Please find attached the following documents for the above application:

- HBMCE's Written Representations
- HBMCE's Appendices to Written Representations
- HBMCE's Summary of the Written Representations
- HBMCE's Responses to the Examiners Questions issued on 20/12/18.

As referred to in our Written Representations, the Historic Buildings and Monuments Commission for England is generally known as Historic England. However, due to the potential for confusion in relation to "HE" (Highways England and Historic England), we have used "HBMCE" in our formal submissions to the examination to avoid confusion.

With regard to Accompanied Site Visits, we wish to request that the following sites are included on the itinerary:

- Hazlegrove House Registered Park and Garden (Grade II) – We have made extensive comments on this designated heritage asset in our Written Representation. The registered park and garden will be directly impacted by the Scheme, and there will need to be careful consideration of the potential extent and severity of the impact of the new Scheme on this asset.
- Camel Hill Farm scheduled monument - We consider that the visual impact of the widened carriageway on the experience of the monument should be assessed and has requested Highways England (the Applicant) to do this, and illustrate its assessment in the form of a photomontage (or photograph superimposed with a wireframe) after construction and following implementation of an appropriate mitigation strategy.

Should you have any queries regarding our submissions, please do not hesitate to contact me.

I would be grateful if you could confirm receipt of our documents.

Yours faithfully,

Jo McAllister

Heritage at Risk Landscape Architect  
South West & West Midlands Region  
Direct Line: 0117 9750696  
Mobile: 07881 258413

Historic England, 29 Queen Square, Bristol BS1 4ND  
[www.HistoricEngland.org.uk](http://www.HistoricEngland.org.uk)



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**WRITTEN REPRESENTATIONS  
ON BEHALF OF THE  
HISTORIC BUILDINGS AND MONUMENTS COMMISSION FOR ENGLAND  
(HISTORIC ENGLAND)  
("HBMCE")**

**Application by  
Highways England for an Order granting Development Consent for the A303  
Sparkford to Ilchester Dualling**

**PINS Reference No: SPIL-SP0005 & 2001-4933  
HBMCE Reference No: PL00285449**

## **CONTENTS:**

- 1. INTRODUCTION**
- 2. ROLE OF THE HISTORIC BUILDINGS AND MONUMENTS COMMISSION FOR ENGLAND (HBMCE)**
- 3. SCOPE OF WRITTEN REPRESENTATION**
- 4. THE PROPOSALS AND HBMCE'S INVOLVEMENT WITH THE SCHEME**
- 5. THE SIGNIFICANCE OF DESIGNATED HERITAGE ASSETS AFFECTED BY THE SCHEME**
- 6. STATEMENT OF COMMON GROUND (SoCG)**
- 7. ASSESSMENT OF IMPACT ON DESIGNATED HERITAGE ASSETS**
- 8. DEVELOPMENT CONSENT ORDER**
- 9. CONCLUSION**
- 10. APPENDICES:**
  - a. National Heritage List for England entries for relevant designated heritage assets.
  - b. Site walkover minutes 15/03/17
  - c. Letter 29/03/17: Non-statutory public consultation on shortlisted options.
  - d. Letter 14/12/17: HBMCE Scoping opinion.
  - e. E mail 14/03/18: HBMCE comments on Statement of Significance – Hazlegrove House RPG
  - f. E mail 06/08/18: HBMCE comments on OEMP and SoCG.
  - g. ETWG minutes 29/11/18
  - h. Hazlegrove Junction cross sections (circulated by Applicant on 27/11/18)

## **1. INTRODUCTION**

- 1.1. The following statement has been prepared by the Historic Buildings and Monuments Commission for England (HBMCE) for the Examination of Highways England's application for a Development Consent Order (DCO) for the nationally significant infrastructure project to construct the A303 Sparkford to Ilchester Dualling (the 'Scheme').
- 1.2. HBMCE has been involved through engagement with the Environmental Technical Working Group (ETWG) in discussion of Highways England's development of the Scheme since 2017. The ETWG is made up of the Applicant, HBMCE, South Somerset District Council, South West Heritage, the Environment Agency, Natural England, National Trust and Somerset Gardens Trust amongst others.
- 1.3. In accordance with the National Networks National Policy Statement which is relevant in the determination of this Scheme, the Scheme should avoid or minimise the conflict between the conservation of any heritage assets affected and any aspect of the proposal. HBMCE's engagement and advice in relation to this Scheme has focused on assisting Highways England in this regard due to the potential for adverse impacts on the significance of the historic environment arising from the detail of the Scheme. At present, a range of matters relating to potential adverse impacts remain under discussion between the parties.
- 1.4. HBMCE continues in discussions with Highways England in relation to the content of a Statement of Common Ground (SoCG) which is in the process of being compiled by Highways England on behalf of both parties.
- 1.5. This Written Representation sets out HBMCE's position in relation to the significance of the designated heritage assets affected by the Scheme that it has engaged on, and the impact of the Scheme on the significance of those assets, including any contribution made by their settings to their significance.

## **2. ROLE OF THE HISTORIC BUILDINGS AND MONUMENTS COMMISSION FOR ENGLAND**

2.1. The Historic Buildings and Monuments Commission for England is generally known as Historic England. However due to the potential for confusion in relation to “HE” (Highways England and Historic England), we have used “HBMCE” in our formal submissions to the examination to avoid confusion. HBMCE was established with effect from 1 April 1984 under Section 32 of the National Heritage Act 1983. The general duties of HBMCE under Section 33 are as follows:

“...so far as is practicable:

- (a) to secure the preservation of ancient monuments and historic buildings situated in England;
- (b) to promote the preservation and enhancement of the character and appearance of conservation areas situated in England; and
- (c) to promote the public’s enjoyment of, and advance their knowledge of, ancient monuments and historic buildings situated in England and their preservation”.

We also have a role in relation to maritime archaeology under the National Heritage Act 2002 and advise Government in relation to World Heritage Sites and compliance with the 1972 Convention Concerning the Protection of the World Cultural and National Heritage.

2.2. HBMCE’s sponsoring department is the Department for Digital, Culture, Media & Sport, although its remit in conservation matters intersects with the policy responsibilities of a number of other government departments, particularly the Ministry of Housing, Communities and Local Government, with its responsibilities for land-use planning matters.

2.3. HBMCE is a statutory consultee providing advice to local planning authorities on certain categories of applications for planning permission and listed building consent, and is also a statutory consultee on all Nationally Significant Infrastructure Projects. Similarly HBMCE advises the Secretary of State on those applications, subsequent appeals and on other matters generally

affecting the historic environment. It is the lead body for the heritage sector and is the Government's principal adviser on the historic environment.

2.4. In light of its role as a statutory consultee, HBMCE encourages pre-application discussions and early engagement on projects to ensure informed consideration of heritage assets and to ensure that the possible impacts of proposals on the historic environment are taken into account. In undertaking pre-application discussions for a scheme such as this, the key issue for HBMCE is ensuring that the significance and the impact on that significance of any heritage assets that may be affected is fully understood; that any proposals to avoid, or mitigate that impact have been considered and can be secured, and that the decision maker is fully informed and can be satisfied that there is clear and convincing justification for any harm with great weight given to the asset's conservation. Any harmful impact on the significance of a designated heritage asset should be weighed against the public benefit of development, recognising that the greater the harm to the significance of the heritage asset, the greater the justification that will be needed for any loss.

### **3. SCOPE OF WRITTEN REPRESENTATION**

3.1. As stated in our Section 56 Relevant Representation, HBMCE's interest in this scheme is focused upon the following designated heritage assets:

- (a) Grade II Registered Park and Garden (RPG) at Hazlegrove House;
- (b) Scheduled Monument Romano-British Settlement Immediately South West of Camel Hill Farm; and
- (c) Scheduled Monument Medieval settlement remains 100m and 250m north of Downhead Manor Farm.

The relevant entries on the National Heritage List for England for these are set out in Appendix A.

3.2. We have a particular focus on the Grade II Registered Park and Garden (RPG) at Hazlegrove House (NHLE 1000422), which will be directly impacted by the Scheme and the extent of the potential severity of the impact of the new road.

- 3.3. Whilst not directly impacted by the Scheme, the scheduled monuments of the Romano-British Settlement Immediately South West of Camel Hill Farm (SM 33061; NHLE 1020936) and the Medieval settlement remains 100m and 250m north of Downhead Manor Farm (SM 35717; NHLE 1021260) lie in proximity to the Red Line Boundary. The Camel Hill scheduled monument in particular abuts the Red Line Boundary along both its southern and northern edge, the latter following the alignment of the temporary haul road. HBMCE is concerned to ensure that the impact of the Scheme on the contribution made by the settings to the significance of these monuments is fully considered and appropriately dealt with.
- 3.4. We would also note that the proposal has the potential to impact on two other designated heritage assets. These comprise the Triumphal Arch Gateway (Grade II\*) and a listed milestone (Grade II). For the sake of completeness the entries for these are also included in Appendix A.
- 3.5. The Triumphal Arch Gateway to Hazlegrove House (MM27) is a Grade II\* listed building (NHLE 1272919). The existing A303 has divorced this asset from the RPG and Hazlegrove House. The principal changes to the A303 under the proposed Scheme impact the north side of the road where it passes through the RPG. The gateway and lodge remain divorced to the south but their immediate setting remains largely unaltered. Please refer further to Section 7.2.
- 3.6. The Grade II listed Milestone (NHLE 1345996), located at NGR ST57892538 on the A303 within the Development Consent Order (DCO) boundary, will be directly impacted. This listed milestone and other listed buildings and non-designated heritage assets located both inside and outside the 1km buffer zone (refer to *Figure 7.3 Landscape Constraints Plan* of DCO application) will, we understand, be dealt with by the Council in their written representations.

3.7. The scope of HBMCE's written representation will include:

- a summary of the proposals;
- an outline of HBMCE's consultation and advice on the proposals to date;
- a brief description of the designated heritage assets affected (as noted above) and an assessment of their significance (including that derived from their settings);
- a summary of the key issues agreed and under discussion in the SoCG;
- HBMCE's assessment of the impact of the Scheme;
- HBMCE's comments and observations on the Environmental Statement (ES), including our advice regarding the likely effectiveness and suitability of the proposed mitigation measures;
- HBMCE's comments and observations on the draft DCO.

3.8. Since discussion with the Applicant regarding the draft Statement of Common Ground (SoCG) continues at the time of submission of this Written Representation, we have sought to highlight in these representations the details of those matters which are currently NOT agreed in order to provide a clear understanding of HBMCE's position in relation to those matters. We have also made reference, for the avoidance of doubt, to those matters which are agreed in the Statement of Common Ground.

3.9. A number of written questions have been put to HBMCE by the Examining Authority (ExA) and we are responding to those separately, together with our observations on the questions directed to other parties that are of relevance to HBMCE (as directed in the ExA's Rule 8 letter). Where appropriate and relevant to do so in those responses, we have also provided references to these Written Representations which may provide further detail on the points made.



## 4. THE PROPOSALS AND HBMCE'S INVOLVEMENT WITH THE SCHEME

### 4.1. HBMCE Consultation and Advice to Date

- 4.1.1. A summary of the consultation undertaken between HBMCE and the Applicant is also set out in the Statement of Common Ground (SoCG), which remains in discussion between the parties.
- 4.1.2. HBMCE was approached by Highways England (the Applicant) in early 2017, and we understood at that time that they proposed to dual a section of the A303 between Ilchester and Sparkford. The exact details of the route, the design, and matters relating to construction compounds, extent of impact on the historic environment and proposed mitigation were unavailable. Based on the little information that was then available (refer to site walkover minutes 15/03/17, Appendix B), HBMCE's initial response to the expansion proposals was provided on 15 March 2017, at a site walkover with the Applicant, as part of the non-statutory public consultation on the shortlisted route Options 1 and 2 (Refer to *Environmental Statement: Chapter 3 Assessment of Alternatives, Section 3.7 Justification for chosen option*). This was followed by written confirmation of our initial advice on 29 March 2017 (Appendix C).
- 4.1.3. At that time, it was understood that the Scheme would impact on approximately 30% of the Registered Park and Garden (RPG) of Hazlegrove House (itself listed Grade II – see Appendix A). HBMCE identified in its letter of 29 March 2017 that both options, which had been shortlisted through the Applicant's sifting process, would result in significant environmental impacts, and advised they had potential to cause substantial harm to the significance of the designated heritage asset (see National Networks National Policy Statement para. 5.133). No mitigation proposals were included at this stage and the options were only presented in outline (*Environmental Statement: Chapter 3 Assessment of Alternatives, Fig. 3.1*).
- 4.1.4. With regard to the Scheduled Monuments at Camel Hill and Downhead Manor Farm, HBMCE advised that whilst the information provided appeared to indicate that the proposal would not go through the areas that were scheduled,

there would be a potential environmental effect as a result of the Scheme going through their settings, including on any associated archaeological remains lying outside the present scheduling constraints.

- 4.1.5. Due to the early stage of the development of the Scheme and lack of environmental assessment work available, it was not possible for HBMCE to provide a detailed informed opinion and feedback (refer to site walkover minutes 15/03/17, Appendix B).
- 4.1.6. As a result HBMCE requested that a Statement of Significance be produced for the RPG, as part of the Heritage Impact Assessment, to assist its evaluation of the proposals and their potential impact.
- 4.1.7. The draft Statement of Significance was prepared and issued by the Applicant in February 2018 and formally commented on by HBMCE in March 2018 (refer to Appendix E). Most of the comments have subsequently been addressed with the exception of a requested revision to the Executive Summary and the production of a phasing plan to graphically illustrate the park's evolution and the relationship of the southern parkland (proposed site of Hazlegrove Junction) with the remainder of the site. These are itemised in the SoCG as 'under discussion'.
- 4.1.8. HBMCE also highlighted the importance of producing a Conservation Management Plan (CMP) in our preliminary advice in March 2017, advising that this should consider how best to conserve the park, and retain its significance. We advised that we would expect the CMP 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. The CMP is in our opinion an essential tool in informing the mitigation strategy, and identifying the best means via which the remaining parkland, and the significance it derives from its setting, can be conserved.

- 4.1.9. The production of a CMP also remains under discussion, and itemised in the SoCG. HBMCE understands that the Applicant is currently proposing to produce the CMP under Designated Funds rather than as part of the mitigation proposals under the DCO. We maintain our previously stated position that a CMP should be produced and secured as part of the DCO process.
- 4.1.10. HBMCE has provided advice on the scope of archaeological evaluation to be carried out on and adjacent to the Camel Hill Scheduled Monument, as outlined in the section below, Statement of Common Ground (SoCG).
- 4.1.11. Consultation has subsequently continued through attendance at relevant Environmental Technical Working Group (ETWG) meetings/ site walkovers, meetings to discuss the SoCG and related e-mail correspondence with the Applicant. The aim of the ETWG meetings was to introduce the scheme to stakeholders, keep us informed on progress and design development, undertake discussions to work towards the respective SoCGs, and gain support for the DCO application.
- 4.1.12. In December 2017, HBMCE provided a response to the Planning Inspectorate as part of the formal Environmental Impact Assessment (EIA) scoping consultation (refer to Appendix D). At this time we advised that we did not consider the 1km boundary set for the proposed study area was sufficient to assess the potential impact on significant designated heritage assets lying beyond this limit, which had potential to be visually affected by the Scheme. We also reiterated our advice that a robust assessment of significance of the RPG at Hazelgrove House was imperative to inform the emerging proposals, since this was likely to represent the greatest impact on the historic environment of the whole Scheme. Whilst the Applicant has not amended the 1km study area boundary, the Desk Based Assessment (DBA) appended to the ES contains an assessment of designated heritage assets at greater distance from the Scheme, with a justification for why they have not been included in the more detailed assessment provided in the ES. This

was on the basis that the DBA identified no significant environmental impact.

- 4.1.13. On 23 August 2018 we understand that the application for a Development Consent Order application for the proposed dualling of the A303 between Sparkford and Ilchester was accepted for examination by the Planning Inspectorate.
- 4.1.14. HBMCE provided the Applicant with comments on the Operations Environmental Management Plan (OEMP) in August 2018 in the context of a site walkover on 11 July 2018 and presentation of the latest landscape proposals for Hazlegrove Junction by the Applicant at that time (refer to Appendix F). We advised that, based on the latest more detailed proposals and the location of the works in relation to the overall park, we now considered the level of harm to be less than substantial (see National Networks National Policy Statement para. 5.134). We remained however, keen to see the CMP mitigation factored into the assessment and further detailing of the Scheme.
- 4.1.15. To confirm, and as outlined in the introduction, the National Networks National Policy Statement is the planning policy guidance being used by the Applicant and Examining Authority for the DCO application hence, for the purpose of our written representation, we are not drawing reference to the National Planning Policy Framework.
- 4.1.16. With regard to the landscape proposals for Hazlegrove Junction, which in addition to the site walkover were tabled at a subsequent ETWG meeting (4/10/18), HBMCE has been able to ascertain the extent of proposed woodland planting, parkland tree planting, grassland, hedgerow, fencing and drive surfaces in discussion with the Applicant. These details have not been circulated for full review and are not included in the DCO application documents available on the Inspectorate website. Therefore, HBMCE has not had an opportunity to review detailed planting proposals, such as species mixes, and assess their mitigation impact and potential contribution to the character and setting of the park.

## **5. THE SIGNIFICANCE OF DESIGNATED HERITAGE ASSETS AFFECTED BY THE SCHEME**

### **5.1. The Registered Park & Garden of Hazlegrove House**

5.1.1. The Grade II Registered Park & Garden (RPG) (NHLE 1000422) of Hazlegrove House is a c. 70ha site comprising formal gardens, pleasure grounds and parkland. The site is as an interesting and representative example of an 18th century park, and exemplar of a typical country house estate, parts of which are of much earlier origin. The landscape forms an important group with Hazlegrove House (NHLE 1277545), its gateway and wing walls (NHLE 1248865) which are all listed at Grade II, and is relatively well documented. Despite the fact that the south-west corner of the park is now in arable use and the A303 cuts through its south-east corner, severing the Grade II\* Triumphal Arch Gateway (NHLE 1272919) and the site of the kennels from the park, the site retains the majority of its historic landscape features, and its overall historic landscape character and historic boundaries survive well. The majority of the RPG is occupied by Hazlegrove Preparatory School. The park was placed on Historic England's Heritage at Risk (HAR) Register in 2009. The register identifies heritage assets, such as listed buildings, or scheduled monuments that are at risk as a result of neglect, decay or inappropriate development, or are vulnerable to becoming so. Published annually, it is used by national and local government, and a wide range of individuals and heritage groups to establish the extent of risk and to help assess priorities for action and funding decisions.

5.1.2. The placement of the RPG on the register was attributable to the pressure from the expansion and redevelopment of the school and the threat from the proposed widening of the A303. Following a detailed assessment undertaken by HBMCE in 2016, the designed landscape was removed from the HAR register as, although it was still considered to be vulnerable, it was no longer at high risk. This assessment was based on the acknowledgement that new development associated with the school was generally being confined to a defined area of the grounds, there was evidence of positive parkland management being undertaken, and there was firm no indication that

proposals were being considered (such as amendments to the A303) which would have a bearing on the registered park. To clarify, in HBMCE's correspondence in Appendix F it is mistakenly referred as being on the risk register. However, as noted above, it was removed from the risk register in 2016, but there is the potential (as advised in our e mail in Appendix F) for the road widening to put it at further risk.

## **5.2. The Romano-British Settlement Immediately South West of Camel Hill Farm**

- 5.2.1. The scheduled monument of the Romano-British Settlement Immediately South West of Camel Hill Farm (SM 33061; NHLE 1020936) (subsequently referred to as Camel Hill Scheduled Monument) includes the recorded extent of a Romano-British settlement. This is of late 2nd /early 3rd to 4th century AD date and is located just to the north of the modern A303 on Camel Hill (refer to Appendix A). The settlement location commands extensive views in all directions particularly to the west where it overlooks the Somerset Levels.
- 5.2.2. The site was first identified by a geophysical survey leading subsequently to archaeological excavation which revealed the presence of several Roman-style buildings and at least one cremation burial. Pottery evidence also revealed an occupation phase in the early Iron Age (perhaps 7th to 6th century BC) but no certain evidence for buildings associated with this earlier occupation were recorded. The partial excavation at Camel Hill has demonstrated the presence of Roman buildings covering an area of at least 130m in length flanking the northern side of what is considered to be the route taken by a major Roman road leading into Ilchester. The A303 is believed to preserve the line of this route between Andover and the Roman town of Ilchester (Lendiniae). Such occupation is usually indicative of a roadside settlement. This settlement lies only 7km north east of Ilchester upon which it may have been dependent for its economic survival.
- 5.2.3. The density of the Romano-British rural settlement around Ilchester has long been known and research in the latter part of the 20th century has suggested that Ilchester, by the third century, may have become a subsidiary civitas

capital (administrative centre) for an area occupying the former northern tribal territory of the Iron Age Durotriges in what is now Somerset. It may be significant that the settlement at Camel Hill appears to commence fully in the 3rd century during the period of Ilchester's suspected enhanced political status. The location of the settlement site affords it extensive views across the landscape in all directions. The ES (Chapter 6 and Appendix 6.1) recognises the desirability of this location for early settlement and discusses the suggestion that the settlement was orientated to face Lamyatt Beacon, the site of a Roman shrine that is also a scheduled monument (SO 327; NHLE 1003748), with views to the north and east towards the beacon making a particular contribution to the setting of the monument.

5.2.4. The full extent of the Romano-British settlement is not known, and as a result there is potential for associated archaeological remains to be preserved within the Red Line Boundary of the Scheme. Excavation of the settlement has demonstrated the preservation of archaeological information which will be informative about the level of prosperity and the economy of the Romano-British period of the 3rd and 4th centuries as well as providing insights into the lives of the inhabitants of the settlement.

### **5.3. The Medieval Settlement Remains 100m and 250m North of Downhead Manor Farm**

5.3.1. The Medieval Settlement Remains 100m and 250m North of Downhead Manor Farm (SM 35717; NHLE 1021260) (subsequently referred to as Downhead Farm Scheduled Monument) lie in two separate areas of protection. They include the earthwork remains of part of a medieval settlement which is situated to the north west of West Camel (refer to Appendix A). The site occupies an area of level ground below the steep western slope of West Camel Hill, which lies to the east, and the gentle slope of Annis Hill, to the west.

5.3.2. The earthwork remains indicate the sites of former houses, including a possible manor house, outbuildings and paddocks, together with hollow ways which represent streets and access lanes. Together they represent the areas

of abandonment caused by the shrinkage of Downhead village, a settlement of pre-Domesday (AD 1086) date, and are a good example of this class of monument. The history of Downhead village is well-documented and its ownership can be traced without interruption from its pre-Domesday origins. The settlement has been occupied continuously from at least the mid-11th century down to the present day, its decline leaving only the still occupied farmstead of Downhead Manor Farm and a few cottages to the south.

5.3.3. It is likely that the sale of the manor precipitated this decline and dispersal of the ancient holdings in the parish. Large parts of the medieval village lie undisturbed by later occupation or cultivation and will contain archaeological deposits and environmental evidence relating to the monument and the wider landscape in which it was constructed.

## **6. STATEMENT OF COMMON GROUND (SoCG)**

6.1.1. This section summarises the issues that have been agreed to date, and those that are currently under discussion for the SoCG between HBMCE and the Applicant since consultation began.

Whilst we are presently unable to agree on all matters within the Statement of Common Ground (SoCG) with the Applicant, a draft has been circulated and its contents are under discussion. We understand that the Applicant's archaeological assessment and evaluation work is being undertaken, additional photomontages are being produced, and clarity on the extent to which the impact upon the RPG can be minimised and how optimal, appropriate mitigation will be secured is being reviewed and finalised by the Applicant. HBMCE considers that all of these items are required to inform its, and the Examining Authority's, assessment of the impact of the Scheme.

6.1.2. Issues agreed:

- (a) Archaeological evaluation and mitigation: The methodology of archaeological evaluation using geophysical surveys and trial trenching evaluation undertaken to date for the designated heritage assets (2017-



2018). This does not apply to subsequent evaluation and mitigation, post 2018, as we are currently waiting for the provision of survey reports completed to date. Refer also to issues under discussion.

(b) Environmental Scoping Opinion.

Additional inclusion of assessment of designated heritage assets outside the 1km study area satisfactorily addresses HBMCE's comments at the scoping stage in this regard. It is agreed that a Statement of Significance for Hazlegrove will be produced for the RPG. The contents of the draft are under discussion, see below.

(c) Criteria used for assessing value/sensitivity of the designed heritage assets.

HBMCE has reviewed the criteria used for assessing value/sensitivity of the designed heritage assets, as laid out in the ES *Chapter 6, Cultural Heritage*, Table 6.1, and the values attributed to those assets under Table 6.4. We confirm we accept the criteria and values.

(d) Temporary Construction and Permanent Impact on the Triumphal Arch (Grade II\*).

HBMCE confirms it agrees with the assessment of (*Chapter 6, Section 7 Impact assessment, Appendix 6.1, Table 7.2*).

6.1.3. Issues remaining under discussion:

(a) EIA Assessment.

HBMCE is not satisfied that all minor errors and inconsistencies have been identified and addressed by the Applicant.

(b) Contents of the Hazlegrove House RPG Statement of Significance

The preparation of a Statement of Significance for Hazlegrove House RPG is in progress. HBMCE has requested an executive summary, and a phasing plan as referred to above. The executive summary has been drafted and commented on, and we understand that the phasing plan is currently being actioned by the Applicant.

- (c) Hazlegrove Junction.
- Whilst the introduction of woodland planting along the bunds will in our opinion help to mitigate the visual impact of the road and traffic from the park and House once mature, it will not reduce the direct physical impact of the junction, its associated earthworks and drainage on the character and setting of the park. In addition it will not mitigate the physical loss of parkland through extension of the junction into the registered area. A summary statement on the level of impact is therefore to be agreed to ensure that a full understanding of the significance is available to inform the Examining Authority.
- (d) Impact on views from Hazlegrove House.
- HBMCE has requested evidence, in the form of a photomontage, to clarify whether Camel Hill Services will be screened from views from the House by the mitigation proposals.
- (e) The ability of the scheme to retain the intersection between the historic driveways and historic lane within the retained woodland (adjacent to the junction remains under discussion. The drive is indicated on the 1785 Queen Camel Enclosure Map (Fig. 4.3b of the *Statement of Significance, ES Appendix 6.2*) and is considered to have been associated with the 1730s alterations to Hazlegrove House. The degree to which this can be achieved is being investigated by the Applicant.
- (f) The alignment of the new drive (and access road to the school) into the RPG remains under review. HBMCE has queried how it responds to the topography and parkland setting, as it currently appears rigid and engineered (as set out in our comments on the Environment Statement). Contours plans have not been available to review to date. A justification for the current alignment has now been provided by Applicant, and is in the process of being reviewed by HBMCE, and once we have had an opportunity to do so, we will look to provide our comments in the Statement of Common Ground.

- (g) Production of a Conservation Management Plan (CMP) for the RPG. HBMCE has requested that the CMP be included as part of the DCO application in order to inform development of the most appropriate mitigation strategy (as set out in Section 4 above). The Applicant is preparing a memorandum of understanding (MoU) to be shared with HBMCE demonstrating their commitment to undertaking a CMP, but under Designated Funds. We have not yet seen the MoU, and the concern remains that a mitigation strategy is not yet in place and secured. The potential impact of ecological mitigation on associated archaeological remains in the setting of the Downhead Manor Farm Scheduled Monument. HBMCE is currently seeking additional clarification regarding the extent and scope of the mitigation proposals to ensure that the impacts have been considered.
- (h) Archaeological survey and evaluation methodology. HBMCE has not seen the final results of the archaeological survey and evaluation conducted to date within the Red Line Boundary. We also await receipt of a specification for the remainder of the archaeological survey and evaluation that remains to be conducted within the Red Line Boundary.
- (i) Intersection of Scheme with Camel Hill Scheduled Monument – Northern haul road. An archaeological evaluation in the form of a geophysical survey and trench evaluation is to be undertaken along the footprint of the northern haul road to establish the potential for archaeological remains associated with the monument. HBMCE understands that the Applicant intends to take account of the results of this work in the WSI to be submitted as additional environmental information during the DCO process. HBMCE awaits completion of this evaluation and the subsequent reports.

- (j) Intersection of Scheme with Camel Hill Scheduled Monument – Buffer Zone.  
HBCME awaits clarification of the extent, positioning and form of the buffer zone. This will need to be informed by the results of the full geophysical survey report (rather than the preliminary results) and the results of archaeological evaluation adjacent to the scheduled monument. Since those completed reports are awaited this remains under discussion. We have also requested confirmation that the limits of deviation will not result in lateral encroachment into the monument.
- (k) Mitigation of direct physical impact on archaeological remains.  
HBMCE has requested an outline archaeological and historic environment mitigation strategy and is awaiting this together with a revised draft of the OEMP and draft of the WSI that will be included in the CEMP. Additional comments have been provided on the OEMP.
- (l) Findings of Environment Statement (ES). This is dealt with in more detail in Section 7.5 below.
- (m) Requirements of the DCO. This is dealt with in more detail in Section 8 below.
- (n) Appreciation and assessment of Camel Hill Scheduled Monument as a visual receptor.  
HBMCE maintains its position that the scheduled monument at Camel Hill is a visual receptor; it has not currently been included by the Applicant in the visual assessment. The Applicant considers that there will not be an adverse visual impact on the setting of the scheduled monument. However they have agreed to prepare a photomontage from the south west corner of the monument to demonstrate this. To date this photomontage has not been submitted as part of the application documentation. The Applicant's agreement to produce this photomontage is recorded in the minutes of the meeting held with HBMCE on 29/11/18 (refer to Appendix G). HBMCE has requested that

this issue be included in the draft SoCG and will be subject to further discussion.

## **7. ASSESSMENT OF IMPACT ON DESIGNATED HERITAGE ASSETS**

7.1.1. Under this section HBMCE sets out its assessment of the impact on Hazlegrove House RPG, and the scheduled monuments at Camel Hill, and Downhead Manor Farm. The focus on these assets is due to the significant environmental effects we have identified in our own assessment of the impact of the Scheme. We then set out our comments on the Environmental Statement (ES), how it corresponds to our assessment, and where it differs or requires further clarification or investigation.

### **7.2. HBMCE's Assessment of Impact on Hazlegrove House RPG**

7.2.1. The Scheme will have a negative environmental effect on the significance of the Hazlegrove House Registered Park and Garden. That effect will result from the harm caused by the permanent loss of parkland and associated earthworks (the Environmental Statement estimates 14% of the RPG), where the new Hazlegrove Junction will be located, and the resultant impact on the character and setting of the RPG, most notably the south west end that provides the main approach into the park and to Hazlegrove House.

7.2.2. The elements of the park's character and setting that contribute to its significance comprise the open, landscaped parkland (predominantly grazed pasture), veteran parkland trees, earthworks and field boundaries associated with the original 18th and 19th century drives, the extent of the views to and from the House and drive, long distance views from the drive out of the park, notably to the west towards Glastonbury Tor.

7.2.3. The Scheme, once operational, has potential to impact on all these elements of significance through physical impacts on open parkland, veteran trees, the existing drive, the surviving earthworks associated with the original drives, the visual impact of Hazlegrove Junction and traffic on views within the park , the

change in character of the parkland associated with the new junction layout, new earth bunds, the attenuation basin, and realigned drive. The negative effect of the visual intrusion and noise of construction infrastructure on the setting of the park and House is acknowledged to be temporary.

7.2.4. The introduction of dual carriageway in the 1990s has already had a significant impact on the historic, evidential, and aesthetic value of the park. The road has severed the south east corner of the park, comprising the original 18th century entrance, with the associated Triumphal Arch Gateway and Lodge (Grade II\*), from the rest of the park and House. The principal changes to the A303 under the proposed Scheme impact the north side of the road where it passes through the RPG. The gateway and lodge will not be directly impacted as they will remain divorced to the south and their immediate setting remains largely unaltered. There is an impact in terms of the wider setting to the gateway and lodge and, based on the assessment criteria used in the ES (Chapter 6, Table 6.1-3) the level of harm would be categorised as minor. We have carefully considered this and agree with this assessment and have confirmed our position in the SoCG. The Examining Authority will need to take the view as to whether the public benefits of the scheme outweigh the level of harm to this designated heritage asset.

7.2.5. Evidence suggests that parkland at the southern end of the RPG was originally farmland and incrementally incorporated into the landscaped grounds to the north to harmonise the main approach to the House during the 19th century. During the 20th century, as the ownership of the park has become split, the south west corner of the park has been converted to arable cultivation. HBMCE considers that the southern parkland, although a later addition (with the exception of the 18th century south east drive), is significant to the development of this exemplar of a typical country house estate. Whilst the scheme proposes to convert the arable field back to open pasture, the degree to which this can be achieved, and the character reinstated, is limited by the introduction of the attenuation basin, access road and associated fencing. In light of the constraints the latter proposals present, and in the absence of a Conservation Management Plan (currently under discussion as

part of the SoCG) HBMCE considers that the scheme brings limited positive benefits to the RPG, except for the potential reduction in visual impact of the A303 on historic views, notably long distance views from the House.

7.2.6. In HBMCE's view it is not yet possible to provide a final assessment of the effects of the impact of the Scheme since there is outstanding information required to complete that assessment as detailed under Section 7.5 Environmental Statement.

### **7.3. HBMCE's Assessment of Impact on Camel Hill Scheduled Monument**

7.3.1. The Scheme will have a negative environmental effect on the significance of the Camel Hill Scheduled Monument. That effect will result from the harm caused to the contribution made to the significance of the scheduled monument by its setting. The elements of setting contributing to the monument's significance comprise the surrounding landscape, associated with its character and the extent of the views to, from and including the settlement, the spatial, functional and historic relationship with archaeological remains directly associated with the settlement outside the protected boundary of the scheduling, and the association with the Roman road to Ilchester. The Scheme has potential to impact on all these elements of significance through physical impacts on archaeological remains, the visual impact of equipment, machinery and the finalised road alignment on views out from the scheduled monument, the change in character on the land associated with the temporary construction of a haul road, and the impact of factors such as noise and dust on the experience of being within the scheduled monument.

7.3.2. The negative effect of the visual intrusion of machinery and construction infrastructure in views from the scheduled monument, particularly as a result of the haul road intervening in views from the monument in the direction of the Lamyatt Beacon shrine, is acknowledged to be temporary. Following completion of the Scheme, if the land is successfully restored there should be no lasting visual impacts.

7.3.3. The continuation of the character of Camel Hill Scheduled Monument as a roadside settlement is to some extent retained through the fact that the A303 reflects the persistence of this important historic route. However the modern road has impacted on that relationship through loss of evidential significance including for the Roman road itself and change in the relationship between the road and the monument. The dualling of the road will increase this impact as a result of the widening of the carriageway; the A303 will have an increased imposition on and through this landscape without direct spatial or functional relationship with the remains of the Roman settlement. Whilst the nature and character of the current A303 has already had a negative impact on the scheduled monument, HBMCE still considers that the visual impact of the widened carriageway on the experience of the monument should be assessed and illustrated in the form of a photomontage (or photograph superimposed with a wireframe) after construction and following implementation of an appropriate mitigation strategy.

7.3.4. The level of evidential impact associated with the damage to or loss of archaeological remains caused by the main construction programme and by the temporary construction of the haul road cannot be assessed prior to completion of the proposed programme of archaeological investigation (geophysical survey and trial trenching) and submission of the relevant reports. The level of any harm caused will depend on the significance of any remains identified, the potential for these to extend beyond the areas investigated within the Red Line Boundary of the Scheme, and the physical impact of the construction programme and mitigation strategy. Loss of, or damage to, any archaeological remains directly related to the settlement is likely to negatively impact on the significance of the scheduled monument. These impacts will be permanent, and it is important that the potential for, and level of, harm is properly assessed at an early stage to ensure that there is sufficient time to ensure that the proposed mitigation strategy is appropriate and proportionate to the significance of any remains and the level of harm caused. For this reason it will be essential to conduct any remaining archaeological investigation at the earliest opportunity and ensure that



reporting of the results is prioritised so that these can inform the proposed mitigation strategy.

7.3.5. In HBMCE's view it is not yet possible to provide a final assessment of the effects of the impact of the Scheme since there is outstanding information required to complete that assessment as detailed above.

#### **7.4. HBMCE's Assessment of Impact on Downhead Manor Farm Scheduled Monument**

7.4.1. The Scheme will have a negative environmental effect on the significance of the Downhead Manor Farm Scheduled Monument. That effect will result from the harm caused to the contribution made to the significance of the scheduled monument by its setting. The elements of setting contributing to the monument's significance comprise the surrounding landscape, associated with its character and land use, and the spatial, functional and historic relationship with archaeological remains directly associated with the settlement outside the protected boundary of the scheduling. The Scheme has potential to impact on all these elements of significance through physical impacts on archaeological remains, the visual impact of equipment and machinery on views to from and including the scheduled monument, the change in character on adjacent land associated with ecological mitigation, and the impact of factors such as noise and dust on the experience of being within the scheduled monument.

7.4.2. The negative effect of the visual intrusion of machinery and construction infrastructure in views to from or including the scheduled monument is acknowledged to be temporary, as are the other experiential effects associated with noise and dust created by the construction of the Scheme.

7.4.3. HBMCE does not consider that the proposed ecological mitigation works (Works 39 & 40) in closest proximity to the scheduled monument are likely to have a considerable effect on the significance it derives from the character of its setting. However, there is potential for a level of evidential impact

associated with the damage to or loss of archaeological remains impacted by these works. The level of any harm caused will depend on the significance of any remains identified and the physical impact of the works. Loss of or damage to any archaeological remains directly related to the settlement is likely to negatively impact on the significance of the scheduled monument. These impacts will be permanent, and it is important therefore to ensure that the proposed mitigation strategy is appropriate and proportionate to the significance of any remains and the level of harm caused. HBMCE considers that the results of any archaeological investigation conducted in this area together with the detail of work proposals for the ecological mitigation strategy are required to inform the assessment of the level of potential impact on any archaeological remains associated with the scheduled monument within its setting and so contributing to its significance.

7.4.4. In HBMCE's view it is not yet possible to provide a final assessment of the effects of the impact of the Scheme since there is outstanding information required to complete that assessment as detailed above.

## **7.5. Environmental Statement**

7.5.1. HBMCE has reviewed the Environmental Statement (ES), primarily focusing on *Chapters 6 Cultural Heritage* and *Chapter 7 Landscape* and their associated appendices. We have set out our comments under the headings of the designated heritage assets to which they apply. We refer the Examining Authority to the Local Authority's comments on other designated heritage assets within and beyond the 1km study area. In summary, we have identified the following issues for consideration by the Examining Authority in relation to the three assets which are the focus of HBMCE representations. HBMCE would not be in the position to advise further on the level of harm of the proposed Scheme on the designated heritage assets until these issues are clarified by the Applicant:

- (a) Scheme proposals that we do not consider have been factored into the impact assessment and/or addressed by mitigation proposals;

- (b) HBMCE's assessment that, under *Chapter 7 Landscape*, the long term magnitude of impact and significance of effect on the RPG is greater than that identified in the ES;
- (c) Information and reports relevant to the examination of the Scheme which are awaiting submission.

7.5.2. With regard to Baseline Conditions (Chapter 6 Cultural Heritage, Section 4), the Desk Based Assessment makes reference to the large amount of archaeological investigation already conducted as part of the development of the Scheme. No detailed geophysical survey reports or excavation reports have to date been included in the environmental information submitted in support of the Scheme. HBMCE awaits submission of this important information which is essential to conduct an informed assessment of the nature and level of the environmental effect.

**7.5.3. Hazlegrove House RPG:**

- (a) *Chapter 6 Cultural Heritage, Appendix 6.1 Cultural Heritage Desk Based Assessment (DBA), Mitigation (Section 6), 6.1 Design Measures, Para 6.1.3:* We have provided detailed comments under paras g to i below, which assess the mitigation proposals and their effectiveness in reducing the impact of the scheme. In summary, we do not consider that the proposed mitigation measures and their assessment take account of the following:

- 1 The impact of the proposed attenuation basin and associated access road and fencing, in the south west corner of the RPG. No reference is currently made to these elements of the Scheme in the assessment and how their locations have been considered within the setting of the park and whether alternative options to locate them outside the RPG were considered. Our view is that they would have an impact on the character and contribution the setting makes to the significance;
- 2 The level of screening the false cuttings will provide from all

vehicles on the A303, including HGVs;

- 3 The impact of Bund Nos 5-7 (1:3 gradient) on the topography, character and setting of the parkland;
  - 4 The revised entrance and approach into the park along the realigned drive, and how this responds to the parkland topography and character;
  - 5 The location and impact of temporary work compounds and soil stockpiles in the RPG during construction.
- (b) As advised under the section covering HBMCE advice to date (4.1 above), we also consider that, as detailed information on the proposed planting scheme is not included in the application documents (albeit schematic plans have been tabled at previous meetings), there is a limit to which the success of the planting in mitigating the impact of scheme can currently be assessed or judged in terms of their acceptability.
- (c) *Mitigation (Section 6), 6.2 Construction Mitigation, Para 6.2.7:* HBMCE noted that a construction compound and temporary soil stockpiles area is referred to as being located at Hazlegrove during construction (ref. ES Chapter 6, para 6.9.13). However, these are not identified on the Works Plans or included in the Temporary Construction Impact. We consider that further detail, including locations and extents, should be provided as part of the information to the examination (which would build on that provided in the ES, including Table 7.2), and the Work Plans for the DCO, to enable us to ascertain the full extent of the impact and provide supporting evidence to the current assessment.
- (d) *Para 6.2.5:* HBMCE concurs with the need for the identification of an appropriate exclusion area around the earthworks in Hazlegrove House RPG, associated with the original drive, to be established under the Construction Environmental Management Plan (CEMP) to ensure the

earthwork's protection from physical construction effects. However, we are concerned that this does not appear to have been secured in the DCO which would mean that notwithstanding any area being identified, there is no apparent mechanism to ensure that the exclusion area would be provided and the timing for its provision.

- (e) *Mitigation (Section 6), 6.3 Operational Mitigation, Para 6.3.1:* We do not consider that the design of the false cuttings and screen planting would remove all moving traffic from historic views from the park. We agree that in the longer term, when the planting is in leaf and reaching maturity, moving traffic may be removed, but we consider that large vehicles such as coaches and HGVs may be visible during winter months.
- (f) *Mitigation (Section 6), 6.4 Recording, Para 6.4.4:* The potential retention (in part) of the former driveways, within the retained woodland, is currently under review as part of the SoCG discussions.
- (g) *Impact Assessment (Section 7) - Assessment of Temporary and Permanent Construction Impact (Ref. Appendix 6.1 Table 7.2)*  
*Temporary Impacts:* HBMCE agrees in principal with the assessment of magnitude of impact and significance of effect, subject to clarification on the location of temporary soil stockpiles and construction compounds, and no indication of locations provided on the Works Plans. We consider that these should also be included in the assessment to evidence the conclusion.
- (h) The latter statement is also applicable, in *Chapter 7, Assessment of likely significant effects (Section 7.10)*, to the landscape character area *LCA2 Hazlegrove* and visual receptor 35 and 38 within the RPG.
- (i) *Impact Assessment (Section 7) - Assessment of Temporary and Permanent Construction Impact (Ref. Appendix 6.1 Table 7.2),*

*Permanent Impacts:* HBMCE has comments on 'Description of Impact' are as follows:

- 1 The assessment advises that approximately 10.6 hectares of the parkland (approx. 14% of the RPG) will be permanently removed. It is not made clear if this also includes the attenuation basin. The assessment considers that '*the reintroduction of grazed grassland and parkland tree planting will go some way towards reinstating the parkland character that was lost not just through the construction work but also by the current arable farmland use*'. We do not consider that this statement factors in the impact of the attenuation basin and its associated access road and fencing on the character of the park, which we do not consider represents reinstatement of parkland. We consider that the reintroduction of grazed parkland will be minimal relative to the size of the original arable field.
  
- 2 With regard to the statement '*The introduction of woodland planting and false cuttings would screen much of the scheme from important historic views from the house, looking south west across the park*', we do not consider that the false cuttings will have a significant positive impact on screening the scheme. The mitigation relies heavily on woodland planting for screening. Based on our interpretation of the cross sections provided through the junction (Appendix H, *Cross Section at Chainage 5500.000*) the height of the bunds (No.s 5, 6 and 7) above the proposed A303 road and slip road level averages 1.4 metres at the median strip and would not therefore screen large vans, coaches and HGVs. The ES, *Chapter 7 Landscape*, para. 7.9.2 states that the bunds will be 2m high, however this only appears to apply along the outer, northern edge of the east bound carriageway of the A303.
  
- 3 We do not consider that the concluding sentence to para. 7.9.2, '*This would reinstate a more rural character to these views*', takes account of the visual impact of the engineered bunds (No.s 5-7, 1:3

gradient) and attenuation basin on the character and setting of the park which is gently undulating. Whilst we concur that the mitigation will help to reduce the visual impact on historic views, notably long distance views from the House, we consider there would be minimal positive reinstatement of the parkland character of the RPG, as a consequence of these engineered features being introduced. Also, it is not clear how the realigned drive responds to the parkland topography, given its very straight alignment and with the absence of contour plans being available to review in the DCO submission.

- 4 Our comments on para 7.9.2 are also applicable to *Chapter 7, Landscape, Assessment of likely significant effects (Section 7.10): Operational*, where we consider that, in light of these interventions and the physical encroachment of Hazlegrove Junction, the open character and setting to the south west corner of the park will have been changed irreversibly, and the long term effect on the landscape character area *LCA2 Hazlegrove* would remain Moderate Adverse. Based on *Table 7.5: Matrix for the assessment of significance of landscape and visual effects* in Chapter 7, this assessment is based on the 'High' value/ sensitivity and 'Minor', bordering on 'Moderate', magnitude of impact.
  - (j) *Assessment of significant visual effects (Table 7.10): Operational (Visual), Assessment of Visual receptor 35: Representative view from Hazlegrove House Gateway Grade II Listed Building (Registered Park and Garden)*: This is currently not been included in this section of the assessment. A photomontage has been requested by HBMCE as part of the SoCG discussions to clarify the impact during operation.
  - (k) *Assessment of significant visual effects (Table 7.10): Operational (Visual), Assessment of Visual receptor 38, Representative of PROW WN 23/38 and Hazlegrove Registered Park and Garden*: In the Photomontages, Figures 7.8 J & 7.8 K, we note that the veteran tree in the foreground obscures the location of the proposed culvert beneath

the A303 (east of Bund 7), and the environmental barrier that would run above it, which would be visible from the PRow and the existing drive (when travelling south). Therefore, it is difficult to ascertain the visual impact of this feature which, based on the proposed plans, would not be screened by planting or a bund/ false cutting. We also note that the viewpoint location in the photomontage (Figures 7.8 J & 7.8 K) differs from the existing view location indicated in Figure 7.6 D, where the veteran tree is not included and the culvert location is potentially more visible. The A303 is currently screened by mature scrub along this section and does not have a significant visual impact on the approach along the drive, and ProW, when heading south. The opening for the culvert will expose the road and its associated environmental barrier, thereby increasing its impact on the setting of the park and its drive.

- (l) Archaeology within the RPG: As the results of the archaeological evaluation of the historical drive within the existing woodland, are still to be formally issued, we are unable to assess the level of impact and the extent to which the remains of the drive can be retained.

#### **7.5.4. Camel Hill Scheduled Monument:**

- (a) *Mitigation (Section 6), 6.2 Construction Mitigation, Para 6.2.2:* HBMCE does not consider that “toolbox talks” or any other similar construction measures intended to allow operatives to identify potential archaeological remains represents a best practice measure (para 6.2.1) to minimise the effect of the Scheme on buried archaeological remains. It is not in our view appropriate to expect construction operatives to obtain the specialist skills required in the identification of archaeological remains, deposits or artefacts on the basis of a toolbox talk. HBMCE would not agree to the inclusion of this approach in the CEMP.

An appropriate and proportionate response to the potential for archaeological remains should be identified as part of the Written Specification of Archaeological Investigation (WSI) under the CEMP to be executed by a recognised professional and appropriately



experienced archaeological team. Site operatives should not have to identify archaeological remains because the archaeological contractor should be present during all relevant groundworks. The Applicant was advised of our view on this proposal in our comments on the draft OEMP (Appendix F).

- (b) *Para 6.2.5:* HBMCE concurs with the need for the identification of an appropriate exclusion area around the Camel Hill Scheduled Monument to be established under the CEMP to ensure their protection from physical construction effects. However, we are concerned that this does not appear to have been secured in the DCO which would mean that notwithstanding any area being identified, there is no apparent mechanism to ensure that the exclusion area would be provided and the timing for its provision. In addition the positioning, form and extent of the buffer zone is yet to be clarified and agreed.
- (c) *Para 6.2.6:* HBMCE agrees with the proposed approach to the northern haul road which is to identify an exclusion area around the monument, conduct a programme of archaeological evaluation along the line of the haul road, build up the ground in construction of the haul road rather than excavate, and ensure that a programme of monitoring is agreed for inclusion under the WSI to identify any archaeological remains or deposits that are nonetheless exposed during construction of the Scheme and ensure that these are appropriately dealt with. However, the detail of that strategy remains to be submitted as part of the WSI under the CEMP. This regime should be agreed with the local planning authority's specialist archaeological advisor and HBMCE.
- (d) *Impact Assessment (Section 7) - Assessment of Temporary and Permanent Construction Impact (Ref. Appendix 6.1 Table 7.2), Permanent Construction Impact:* The magnitude of impact and significance of the effect will depend on the extent and significance of any archaeological remains affected and their relationship with the scheduled monument. The significance of the impact cannot be fully

established prior to completion of the planned programme of archaeological investigation and submission of the appropriate reports. In addition HBMCE awaits submission of a photomontage demonstrating the visual impact during construction and operation of the Scheme which is needed to assess the nature and extent of this impact on the significance of the scheduled monument (as agreed in ETWG meeting minutes 29/11/18, Appendix G).

- (e) Para 7.5.4 (c) above is also pertinent to *Chapter 7 Landscape, Assessment of likely significant effects (Section 7.10): Construction*, as the photomontage will need to demonstrate the impact on the landscape character area *LCA1 West Camel Hill* as well as considering the scheduled monument as a visual receptor

#### **7.5.5. Downhead Manor Farm Scheduled Monument**

- (a) HBMCE's agreement with the assessments of magnitude of impact and significance of effect in the ES for both temporary and permanent impacts will be subject to the submission of the details of the ecological mitigation works and archaeological evaluation results as outlined under section 7.4. In HBMCE's view it is not yet possible to provide a final assessment of the combined effects of the impact of the Scheme since there is outstanding information required to complete that assessment as detailed above.

## **8. DEVELOPMENT CONSENT ORDER (DCO)**

- 8.1. The purpose of HBMCE's comments on the DCO is to ensure that if appropriate mitigation measures are required to address issues, that these are set out in the DCO and their provision is then undertaken and maintained to ensure that the protection and conservation of the designated heritage assets is delivered. This is important not only during detailed design of the Scheme, but during its construction implementation and operation of the Scheme. This includes the production of and referral to appropriate management documents, including a Conservation Management Plan (CMP) for the RPG at Hazlegrove

House (4.1.8), and an archaeological and historic environment mitigation strategy for any designated and non-designated assets that may be affected 6.1.3(i)). The points raised below are issues that we consider need to be dealt with in the terms of the DCO and that currently this does not appear to be the case.

8.2. The following comments cover articles under Part 1-7, and Schedules 1 and 2:

*8.2.1. Part 2, Limits of Deviation*

- (a) 8. HBMCE would welcome confirmation from the Applicant that the limit of lateral deviation included on the Works Plans (Sheet 3 of 4) will not entail encroachment within the Camel Hill scheduled monument. The WSI to be included under the CEMP as part of the DCO should be designed to cover the area included within the full limit of deviation, both lateral and vertical.

*8.2.2. Part 3, Streets:*

- (a) 17. Access to works – The temporary haulage road runs outside the northern boundary of the Camel Hill Scheduled Monument. HBMCE has commented above in regard to the avoidance and minimisation of impact on the significance this designated heritage asset derives from this part of its setting. It will be important that the provisions to avoid and minimise the impact are therefore secured in the DCO and it is unclear at present whether or not this is the case.

*8.2.3. Part 4, Supplemental Powers:*

- (a) 20. *Discharge of water* - Any proposed works associated with the laying down, taking up or alteration of pipes for the drainage of water should have regard to the archaeological potential of the area and if necessary be subject to the requirements of the WSI included in the CEMP based on the advice of the local planning authority's archaeological adviser. The provisions as currently

drafted do not appear to ensure that this will be secured.

- (b) *21. Protective works to buildings* – The special architectural and historic interest of any listed building affected should be appropriately protected from collateral damage during construction of the Scheme. The special architectural and historic interest of any listed building affected should be a primary consideration with any works. The local planning authority and HBMCE should be consulted on any works affecting a Grade I or Grade II\* listed building, and the local planning authority should be consulted on any works affecting a Grade II listed building.
  
- (c) *22.1.c Authority to survey and investigate land* - HBMCE would expect the Applicant to agree in advance the extent, scope and methodology of any archaeological survey or investigation conducted with the local planning authority and (where a scheduled monument is involved) HBMCE under the WSI to be included under the CEMP. This should be completed sufficiently in advance of the commencement of construction for the results to be analysed to inform an appropriate and proportionate mitigation strategy for that same part of the Scheme.

#### 8.2.4. *Part 5, Powers of Acquisition*

- (a) *47. Removal of human remains.*  
Consent will need to be obtained from the Secretary of State for Justice to remove human remains. HBMCE would expect the treatment of human remains to be addressed under the WSI to be included under the CEMP. This does not appear to have been covered.

#### 8.2.5. *Schedule 1 – Authorised Development*

- (a) HBMCE notes that no site compounds are identified within Hazlegrove RPG on the Works Plan, but a compound and temporary soil stockpile(s) are referenced in the ES (*Chapter 6*

*Cultural Heritage, para. 6.9.13*). HBMCE wishes to seek clarification on this as the extent of impact it could give rise to needs to be considered and appropriately dealt with.

- (b) Work 39 and 40 Ecological Mitigation – Any potential for works to affect non-designated archaeological remains should be appropriately addressed under the WSI to be included under the CEMP.
- (c) Work No. 71 – diversion of telecommunications apparatus. Any potential for works to affect non-designated archaeological remains should be appropriately addressed under the WSI to be included under the CEMP.
- (d) Work No. 80 – temporary northern haul route. Any potential for works to affect non-designated archaeological remains should be appropriately addressed under the WSI to be included under the CEMP.

*8.2.6. Schedule 2 – Part 1, Requirements:*

- (a) *Definition of “Commence”:*  
The draft DCO enables the Applicant to commence works associated with archaeological investigation without triggering the requirements of the DCO. HBMCE has commented above in regard to the need for further investigation in the area of the northern haul road to inform both the assessment of the potential of works under the Scheme in this area to impact on non-designated archaeological remains contributing to the significance the Camel Hill Scheduled Monument derives from its setting. HBMCE consider that it would be beneficial for these to be progressed at the earliest opportunity. In this event any such investigation works should be conducted with the same methodology as that under the WSI to be included under the

CEMP. HBMCE and the local planning authority's archaeological advisor (County Archaeologist) should be consulted on the preparation of the WSI, together with the scope and extent for any archaeological survey and investigation conducted in advance of the DCO.

There is a concern that there is a lack of clarity over these works should they take place without triggering commencement provisions as to how they would then be carried out. HBMCE maintains its view that all archaeological investigation should be conducted sufficiently in advance of the commencement of construction on any part of the Scheme for the results to be analysed to inform an appropriate and proportionate mitigation strategy for that same part of the Scheme.

- (b) Similarly, any further archaeological investigation conducted in advance of the DCO should be agreed in terms of methodology, scope and extent with the local planning authority's archaeological advisor (County Archaeologist) and (as necessary) HBMCE.
- (c) Any other ground works (such as in association with assessment of ground conditions) conducted in areas of acknowledged high potential should similarly be agreed in terms of methodology, scope and extent with the local planning authority's archaeological advisor (County Archaeologist) and (as necessary) HBMCE.
- (d) *Construction Environmental Management Plan, CEMP (3)* – HBMCE has reviewed and provided comments on the draft Outline Environmental Management Plan (OEMP) to the Applicant (Please refer to Appendix F). We understand that a revised version of the OEMP is to be issued by the Applicant for final review, but this has not yet been seen by us. We would, however, expect this to be secured in the DCO.

- (e) *Landscaping (5)* – HBMCE would require consultation on the details of the landscape scheme within Hazlegrove RPG, or along its boundary, prior to implementation to assess any potential impact. We would also request that proposals are informed by the CMP, the production of which is under discussion for the SoCG. We also request that a completion timeline is included for the landscape scheme, to ensure it is completed prior to the new dual carriageway becoming fully operational (subject to appropriate planting season), and to accord with Year 1 photomontage evidence presented in the ES.
- (f) *Fencing (7)* - HBMCE would require consultation on the proposed fencing type within Hazlegrove RPG, or along its boundary, prior to implementation. We would also request that proposals are informed by the CMP, the production of which is under discussion for the SoCG.
- (g) *Archaeology (9)* – HBMCE confirms that the requirement for preparation of an Archaeological Written Scheme of Investigation (WSI) under the CEMP is in line with previous discussions held with the Applicant (refer to Appendix G).
- (h) All archaeological investigation conducted under the WSI not yet completed to date should be completed sufficiently in advance of the commencement of construction for the results to be analysed and inform an appropriate and proportionate mitigation strategy for that same part of the Scheme.
- (i) Given the potential for archaeological remains to be uncovered which are directly associated with the nationally important archaeological remains of any scheduled monument affected by the Scheme, HBMCE would wish to be consulted on the scope, extent and methodology for archaeological work in the relevant parts of the Scheme under the WSI.

- (j) Noise mitigation (14) and Highway lighting (15): HBMCE has requested that a completion timeline is included to ensure the mitigation measures relevant to (14) and (15) are completed prior to the new dual carriageway becoming fully operational.
- (k) We understand that under the Examination timetable the Applicant is due to submit its first revised draft DCO on 23 January, and we will be reviewing its contents and reserve the right to amend or add comments, which we have made in this representations, as a consequence of such revision.

## **9. CONCLUSION**

- 9.1. In conclusion to our written representation, HMBCE consider that there remain to be addressed important issues requiring action and clarification by the Applicant. These are detailed in our written representations. HMBCE understands through discussions with the Applicant that some of these issues are in hand – ie. Executive Summary and phasing plan being produced with regards the Hazlegrove House Registered Park SoS, and the production of archaeological survey and evaluation. These, together with the other issues highlighted, are matters which HMBCE considers are important to enable the extent of impact of the Scheme on the significance of the designated heritage assets to be fully taken into account by the Examining Authority in its final assessment of the Scheme.
- 9.2. Also important, with regards to the design proposals to mitigate the impact of the Scheme on the significance of the designated heritage assets, will be securing a long term management plan. HBMCE are therefore keen to gain a better understanding of long term management proposals, and that these will be properly secured within the DCO.
- 9.3. This section concludes the Written Representation of HBMCE.



9.4. HBMCE will continue to discuss those matters yet to be agreed as part of a positive, constructive dialogue with the Applicant, in the interests of identifying solutions to the range of outstanding issues identified in this Written Representation concerning the avoidance and minimisation of harm to the historic environment that arises under the Scheme.



Historic England

**APPENDICES  
TO WRITTEN REPRESENTATIONS  
ON BEHALF OF THE  
HISTORIC BUILDINGS AND MONUMENTS COMMISSION FOR ENGLAND  
(HISTORIC ENGLAND)  
("HBMCE")**

**Application by  
Highways England for an Order granting Development Consent for the A303  
Sparkford to Ilchester Dualling**

**PINS Reference No: SPIL-SP0005 & 2001-4933**

**HBMCE Reference No: PL00285449**

## **APPENDICES:**

- a. National Heritage List for England entries for relevant designated heritage assets.
- b. Site walkover minutes 15/03/17
- c. Letter 29/03/17: Non-statutory public consultation on shortlisted options.
- d. Letter 14/12/17: HBMCE Scoping opinion.
- e. E mail 14/03/18: HBMCE comments on Statement of Significance – Hazlegrove House RPG
- f. E mail 06/08/18: HBMCE comments on OEMP and SoCG.
- g. ETWG minutes 29/11/18
- h. Hazlegrove Junction cross sections (circulated by Applicant on 27/11/18)

## **APPENDIX A**

**National Heritage List for England entries for relevant designated heritage  
assets.**

## List Entry Summary (Published)

This garden or other land is registered under the **Historic Buildings and Ancient Monuments Act 1953** within the **Register of Historic Parks and Gardens by Historic England** for its special historic interest.

**Name:** Hazlegrove House

**List Entry Number:** 1000422

### Location

Hazlegrove House, Hazlegrove Park, Queen Camel, Somerset

NGR ST5975926497

The garden or other land may lie within the boundary of more than one authority.

County	District	District Type	Parish
Somerset	South Somerset	District Authority	Queen Camel
Somerset	South Somerset	District Authority	South Barrow
Somerset	South Somerset	District Authority	Sparkford

**National Park:** Not applicable to this List entry.

**Grade:** II

**Date first registered:** 01-Jun-1984

**Date of most recent amendment:** 14-Nov-2013

## Asset Groupings

This list entry does not comprise part of an Asset Grouping. Asset Groupings are not part of the official record but are added later for information.

## List Entry Description

### Summary of Garden

An C18 park in part developed from a medieval park, together with early-C18 formal gardens.

### Reasons for Designation

Hazlegrove House is included on the Register of Parks and Gardens of Special Historic Interest at Grade II for the following principal reasons:

- \* Date and rarity: as an interesting and representative example of an C18 park, parts of which are of much earlier origin, enough of the layout survives to reflect the original design, and a proportion of the original layout of its early-C18 formal garden is still visible;
- \* Documentation: the historic development of the landscape has been relatively well documented;
- \* Group value: the landscape forms an important group with Hazlegrove House, its Gateway and wing walls (all listed at Grade II);
- \* Condition: despite the fact that the south-west corner of the park is now in arable use and the A303 cuts through its south-east corner, the site retains the majority of its historic landscape features, and its overall historic landscape character and historic boundaries survive well;
- \* Planting: the park contains a number of important veteran trees.

### History

During the medieval period, Hazlegrove was held by the Crown as part of an estate which included a deer park at Queen Camel. There is evidence that a second park existed during the medieval period at Hazlegrove; the possible park pale lies c 200m north of Hazlegrove House. A park was certainly in existence by 1633 when Gerard records both parks in the manor of Queen Camel; that at Hazlegrove being distinguished by a grove of oaks of remarkable girth (Bond, 1998).

Hazlegrove was acquired by Sir Walter Mildmay in 1556-8, but appears subsequently to have been let to a succession of tenants. A plan of 1573 shows a house, probably built in the mid-C16, surrounded by various enclosures, and with a courtyard to the east. The property descended in the Mildmay family, and by 1652 it included a park extending to 120 acres (c 90ha), an 'orchard garde' and a farm of 300 acres (c 225ha) (indenture, 1652, quoted by Sturdy, 1992). When Sir Humphrey Mildmay died in 1690 without issue, the estate passed to his cousin, Carew Hervey Mildmay of Marks, Essex, who in turn bequeathed it in the early C18 to his great-grandson, also Carew Hervey Mildmay (b1690). In 1730-35, Carew Hervey Mildmay commissioned John and William Bastard of Blandford Forum, Dorset to remodel the existing C16 house (Pevsner, 1958) in a Palladian style. At the same time, a walled enclosure to the south of the house appears to have been constructed, together with a further walled garden to the west known as the Bastion. Further improvements made in the mid-C18 included the construction of the kennels and a 'new causeway in the lawn' (correspondence quoted by Sturdy, 1992), perhaps a reference to improvements in the park. Carew Hervey Mildmay died in 1784 at the age of 93 without a direct male heir. The estate eventually passed to Jane, the daughter of Carew Mildmay of Shawford, who in 1786 married Sir Henry Paulet St John of Dogmersfield Park, Hampshire (qv). Sir Henry St John assumed the additional name of Mildmay by Royal Warrant in 1790.

The late-C18 estate is recorded on a plan of the Manor of Queen Camel (1795), which shows a walled forecourt, smaller in area than the present forecourt, to the south of the house, which contained at its south-east corner a small circular bath house. The plan also shows the Bastion, kennels, orchard and The Lawns, together with a drive running through an elm avenue to the east of the line of the present drive. In 1808, Hazlegrove was inherited by Paulet St John Mildmay, who in 1826 moved to take up residence there and began a programme of improvements in the landscape. These included the demolition of the bath house and the south wall of the C18 forecourt, and its extension to its present southern boundary. The drive appears to have been re-aligned and a new entrance formed, while between 1845 and 1858 the existing farm buildings were removed, the stables re-built, and shrubbery planted around the perimeter of the gardens to form a shrubbery walk (Sturdy, 1992). In 1858 control of the estate passed to Paulet Mildmay's brother, Hervey George, who in 1869 laid out the formal garden below the south front of the house and in 1872 built the lodge and re-erected the C17 entrance arch which he had acquired from Low Ham at the Sparkford entrance to the park. Hervey George Mildmay died in 1882, and during the late C19 the family suffered increasing financial difficulties. The house was let to a succession of tenants, and in 1920 half the estate was sold. The remainder, including the house, was subsequently sold in 1929. The house, formal gardens and part of the park was leased in 1947 to King's Bruton Junior School, and was purchased by the school in 1952. Today (2013), the site remains in divided ownership, with the house, gardens and part of the park remaining in institutional use, and the remainder of the park being in divided private

ownership.

## Details

### LOCATION, AREA, BOUNDARIES, LANDFORM, SETTING

Hazlegrove House is situated c 2km north of Queen Camel, to the north of the A303 road. The c 70ha site comprises some 5ha of formal gardens and pleasure grounds, and c 65ha of park. To the south the boundary is formed by the A303 road, while to the west, north and east the site adjoins agricultural land, from which it is separated by hedges and fences. The late-C20 course of the diverted A303 road cuts through the south-east corner of the park, severing the lodge and the site of the kennels from the remainder of the site. The site occupies a ridge of high ground, from which the land drops sharply to the west and north-west, allowing wide views across the surrounding country towards Glastonbury Tor.

### ENTRANCES AND APPROACHES

Hazlegrove House is today (early C21) approached from the junction of the A303 and the A359 which is marked by a late C20 traffic roundabout on the southern boundary of the park. A late C20 entrance leads to a tarmac drive which extends c 120m north along the line of a former ride, before turning north-east for c 200m on the course of a former footpath, before joining the C19 drive c 450m south of the house. The drive sweeps north-west across the park for c 400m, following the crest of an escarpment and allowing wide views across the lower areas of the park and the surrounding country, before turning sharply north-east for c 200m to approach the forecourt to the south of the house. Immediately outside the forecourt, the drive divides, one branch continuing through a pair of C18 wrought-iron gates supported by a pair of square Ham stone piers surmounted by heraldic beasts (all listed Grade II) into the forecourt, the other branch turning east to pass outside the ha-ha which forms the south-eastern boundary of the forecourt. This branch turns sharply north-east, passing to the east of a late-C20 gravelled car parking area, before reaching a further parking area at the south-east corner of the house.

In the C18 the drive entered the site at approximately its present position, but passed north-east across the park through an elm avenue c 100m east of the course of the present south drive. It then continued on the line of the present south-east drive along the eastern boundary of the gardens and pleasure grounds, to approach the east facade of the house. This arrangement, which may reflect the approach to the C16 house (Map of Hazlegrove, 1573), was modified into its present form by Paulet St John in the early C19. This arrangement was further altered in the late C19 when Hervey George Mildmay built a new lodge at the early-C19 entrance to the park, adjacent to Sparkford, and re-erected as an entrance the late-C17 arch (listed Grade II\*) which he had acquired from Low Ham, Somerset, a house originally built by Sir Ralph Stawell in 1685-90 (Pevsner, 1957). This entrance remained the principal approach to Hazlegrove House until the line of the drive was severed by the new course of the A303 road in the late C20.

### PRINCIPAL BUILDING

Hazlegrove House (listed Grade II) stands on a level site towards the north boundary of the park. The house comprises a three-storey south wing constructed in Ham stone ashlar under hipped slate roofs, lit by sash windows surmounted by individual pediments and with console bracketed eaves. The south-east facade is of similar, but plainer form, while to the north-east a two-storey wing lit by mullioned windows projects beyond the line of the south wing towards the former service court north of the house. The south wing was constructed c 1735 by William and John Bastard of Blandford Forum, Dorset for Carew Hervey Mildmay, probably replacing part of a mid-C16 manor house. The present north-east wing survives from this earlier dwelling.

### GARDENS AND PLEASURE GROUNDS

The formal gardens are situated to the south, west and east of the house, with areas of informal pleasure grounds extending around the outer perimeter of the formal gardens to the west and north of the house.

The south gardens are approached from the east through a pair of wrought-iron gates supported by rusticated stone piers with flat caps which are set in a high brick wall of C18 construction. A gravelled drive extends below the south facade of the house, from which it is separated by deep herbaceous borders. To the west the drive is terminated by a further pair of wrought-iron gates supported by similar rusticated piers surmounted by vase finials. To the north-west the forecourt is enclosed by C18 brick walls, while to the south-west it is bounded by a belt of ornamental trees and shrubs. To the north-east it is enclosed by further C18 walls and to the south-east by a belt of shrubbery which separates it from the late-C20 car park. To the south the forecourt is bounded by a brick-walled ha-ha which rises to form a pair of low quadrant walls flanking the C18 wrought-iron gates and piers which stand on the central north-south axis of the forecourt. A gravelled drive extends north from the gates dividing two rectangular panels of lawn which are planted with a symmetrical arrangement of early-C20 specimen conifers. After c 100m, the drive divides to enclose a rectangular lawn, each corner of which is marked by a mid-C19 marble figure of a putto supporting a carved stone planting basket. The centre of the lawn is marked by a quatrefoil-shaped marble basin in the centre of which stands a carved fountain in the form of a boy holding a swan. The fountain was installed in 1871 by Hervey George Mildmay, replacing a smaller basin which he had installed in 1869 and which was subsequently moved to the east garden.

The gate in the north-west wall of the forecourt leads west to an approximately rectangular level area enclosed to the east and north by brick walls c 3m high. The north wall is planted with espalier-trained fruit trees, and retains a series of C19 cast-iron brackets for supporting glass fruit protectors. To the south and west the area is bordered by a thick belt of evergreen shrubbery and mature specimen trees, while the levelled area is today (early C21) laid out as all-weather sports pitches. This area corresponds to the early-C18 'Bastion', which appears to have been a walled productive garden, to the west of which was a more level area, now covered by C19 shrubbery and trees, but which would have provided westerly views across the park and surrounding country. In the mid-C18, Carew Hervey Mildmay is said to have been in the habit of driving his four in hand carriage to the Bastion in order to watch his hounds in Kennel Ground (Sturdy, 1992). The walls enclosing the south and west sides of the Bastion have been demolished in the C20, while mid and late-C20 school buildings have been constructed at the eastern end of the Bastion. An opening in the north wall partly closed by C19 wrought-iron railings and gates, leads to a further area north of the Bastion which has been developed with mid-C20 single-storey staff accommodation on the site of C19 sheds and bothies (OS, 1904). To the north-west there is a mid-C19, two-storey stone gardener's cottage with ornamental barge boards and a high central chimney stack.

A further gate set in a high brick wall at the north-east corner of the forecourt leads to a small formal garden below the east facade of the house. A stone flagged terrace extends immediately below the building, with stone steps descending to the level of a lawn which is laid out with a symmetrical arrangement of two quatrefoil-shaped, stone-edged beds and a central circular basin (dry, 2002), which contains a fountain in the form of three inter-twined fishes supporting a tazza and spout on their tails. This fountain was originally placed at the centre of the south lawn by Hervey George Mildmay in 1869, and was moved to its present position in 1871 (Sturdy, 1992). A stone bench seat is placed on the north side of the lawn, on axis with the gate leading south to the forecourt, while beyond there is a group of mature specimen trees.

The formal gardens and house are encircled to the west, north and north-east by a thick belt of mature specimen trees under-planted with evergreen shrubbery. A circuit of walks extends through this shrubbery belt, allowing views out across the park and surrounding country to the west, and across agricultural land to the north. This circuit of shrubbery walks was developed in the early and mid-C19 by Paulet St John Mildmay and Hervey George Mildmay (Sturdy, 1992). The C19 service areas to the north of the house, which probably occupy the site of the C17 and C18 farm buildings and stables, were removed by Paulet St John Mildmay and Hervey George Mildmay in the early and mid-C19, have been developed with mid- and late-C20 school buildings within the outer belt of the shrubbery walk.

### THE PARK

The park lies principally to the west, south and east of the house. The ground to the east is now (early C21) laid out with a series of sports pitches, but retains significant groups of C 18 and C19 parkland trees, including a group of cedars c 150m east-south-east of the house. To the north-east of the house, adjacent to the late-C20 Headmaster's House, is a group of mature oak pollards, two of which are known as King John's Oak and Queen Elizabeth's Oak, and are said to survive from the medieval park on his site. The park to the south and west of the house remains in agricultural use, and in the early C21 remains predominantly pasture with many scattered specimen trees. The late-C19 and early-C20 OS maps shows two parallel avenues of trees extending south from the south-east

and south-west corners of the forecourt. Planted predominantly in elm, these features were lost through disease in the mid-C20. The southern boundary of the park adjacent to the A303 road is screened by a mixed plantation which extends to the east of the late-C20 diversion of the A303 road. The boundary belt continues north-east to the Sparkford lodge, before returning north-west for c 150m. The kennels marked in this latter boundary plantation on the late-C19 OS map do not survive.

The park was developed in its present form by Carew Hervey Mildmay in the early and mid-C18, and by Paulet St John Mildmay in the early C19, and is recorded on a survey of 1795. The C18 park was itself a development of an existing park which probably originated during the mediaeval period as one of two royal parks associated with the manor of Queen Camel, and which was considered to be ancient when Gerard commented on its oak trees in 1633 (Sturdy, 1992; Bond, 1998). The north-east and east boundaries of the present park may correspond to the mediaeval park pale, the course of which can probably be detected in field boundaries beyond the north, west and south-west limits of the C18 park (OS, 1904).

## Selected Sources

### Books and journals

Bond, J, Somerset Parks and Gardens, (1998), 58, 97  
Lankester, R P A , A History of Hazelgrove House in the Parish of Queen Camel, Somerset, (1958)  
Pevsner, N, The Buildings of England: South and West Somerset, (1958), 193

### Websites

, accessed from <http://www.hazlegrove.co.uk/2052/the-school/>

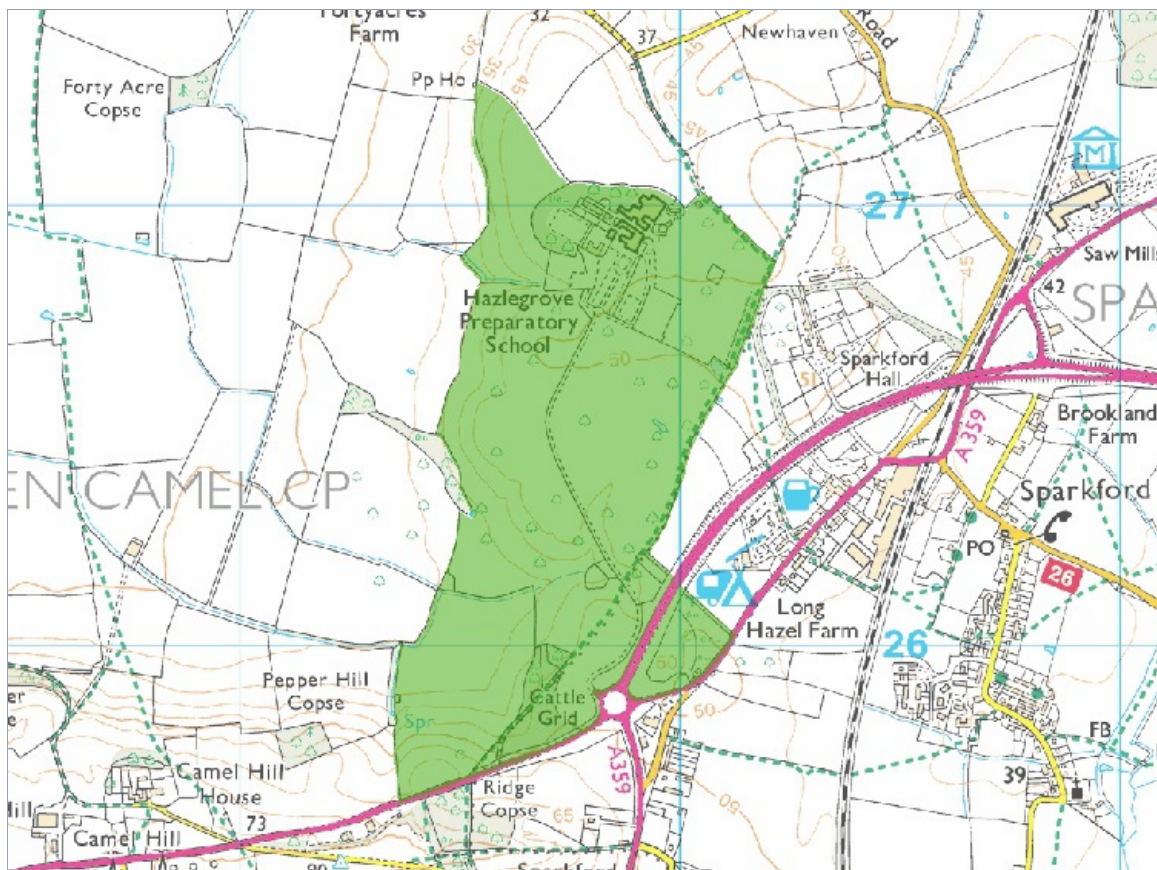
### Other

Milimay family archive including correspondence and estate accounts, held by the Somerset Record Office,  
Rik Sturdy Associates, Historical Summary of Hazlegrove House Gardens, 1992,  
Title: 1st edn OS 1:2500 Source Date: 1888 Author: Publisher: Surveyor:  
Title: Map of Hazlegrove Source Date: 1573 Author: Publisher: Surveyor:  
Title: OS map 1:10000 Source Date: 1904 Author: Publisher: Surveyor:  
Title: Plan of the Manor of Queen Camel Source Date: 1795 Author: Publisher: Surveyor:

## Map

### National Grid Reference: ST5974026233

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## List Entry Summary (Published)

This building is listed under the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended for its special architectural or historic interest.

**Name:** TRIUMPHAL ARCH GATEWAY TO HAZELGROVE HOUSE

**List Entry Number:** 1272919

### Location

TRIUMPHAL ARCH GATEWAY TO HAZELGROVE HOUSE, HIGH STREET

The building may lie within the boundary of more than one authority.

County	District	District Type	Parish
Somerset	South Somerset	District Authority	Sparkford

**National Park:** Not applicable to this List entry.

**Grade:** II\*

**Date first listed:** 24-Mar-1961

**Date of most recent amendment:** 06-Mar-1986

## Asset Groupings

This list entry does not comprise part of an Asset Grouping. Asset Groupings are not part of the official record but are added later for information.

## List Entry Description

### Summary of Building

Legacy Record - This information may be included in the List Entry Details.

### Reasons for Designation

Legacy Record - This information may be included in the List Entry Details.

### History

Legacy Record - This information may be included in the List Entry Details.

### Details

ST62NW  
4/156  
24.3.61

SPARKFORD CP  
HIGH STREET (North-West side)  
Triumphal Arch gateway to  
Hazelgrove House

(formerly listed as Gateway to Hazelgrove Park)

II\*

Gateway in form of triumphal arch. Late C17. Local grey lias ashlar with Ham stone dressing; nature of flat roof unknown. Single arch, with wrought iron gates. Moulded plinth, impost courses, slight corner pilasters and low plain parapet; rather wide pilasters with Ionic capitals flanking 3-centre archway with moulded arched architrave having central keystone. Sides have later gatepiers with scroll sweeps, now redundant, and north-East side has a down pipe with ornamental lead stack head. Archway has double rebates and piers for former double gates; now with wrought iron gates, probably early C20, which have swept top rails, elaborate scrollwork and twist drop points; sides and middle rails also have scrollwork ornament, with a bottom panel of spearpoint rails. Gateway now serves Hazelgrove House (qv) in Queen Camel CP, but was originally built as a gateway to Low Ham Manor, near Somerton, a mammoth project of the late C17 which was never completed; it was presumably acquired by the Mildmay family, lords of Queen Camel Manor, 11 possibly Carew Mildmay, who reshaped Hazelgrove House in 1730.

Listing NGR: ST6004125940

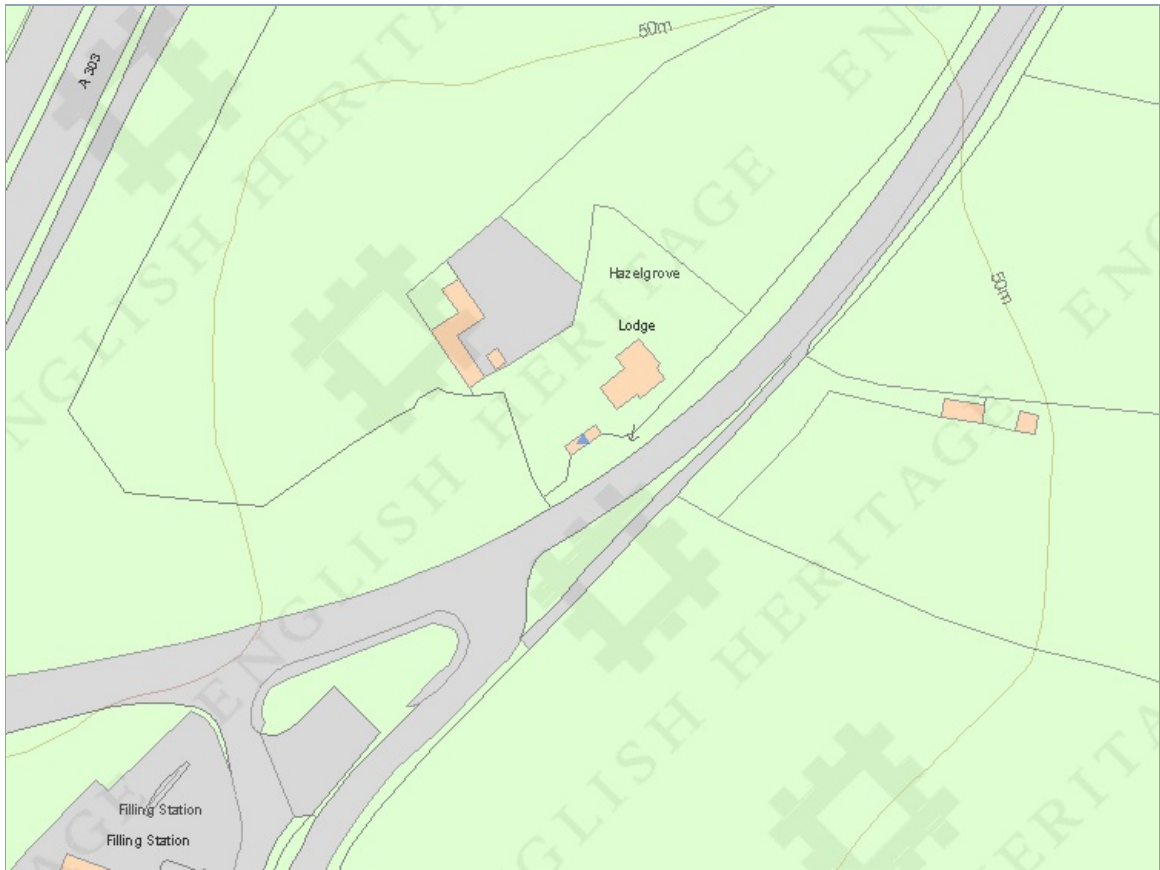
## Selected Sources

### Map

**National Grid Reference:** ST 60031 25927

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## List Entry Summary (Published)

This building is listed under the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended for its special architectural or historic interest.

**Name:** HAZLEGROVE HOUSE

**List Entry Number:** 1277545

### Location

HAZLEGROVE HOUSE, HAZLEGROVE, SPARKFORD, BA22 7JA

The building may lie within the boundary of more than one authority.

County	District	District Type	Parish
Somerset	South Somerset	District Authority	Queen Camel

**National Park:** Not applicable to this List entry.

**Grade:** II

**Date first listed:** 24-Mar-1961

**Date of most recent amendment:** Not applicable to this List entry.

## Asset Groupings

This list entry does not comprise part of an Asset Grouping. Asset Groupings are not part of the official record but are added later for information.

## List Entry Description

### Summary of Building

Legacy Record - This information may be included in the List Entry Details.

### Reasons for Designation

Legacy Record - This information may be included in the List Entry Details.

### History

Legacy Record - This information may be included in the List Entry Details.

### Details

This list entry was subject to a Minor Amendment 26/05/2016

ST52NE  
3/125

QUEEN CAMEL CP  
HAZLEGROVE  
Hazlegrove House

(Formerly listed as Hazelgrove House, HAZELGROVE)

24.3.61

GV  
II

Detached house, now school. C17 or earlier, largely rebuilt by Carew Mildmay in 1730. Ham stone ashlar; hipped Welsh slate roof, brick chimney stacks. Three storeys, 7-bay south elevation. Plinth, band courses, eaves cornice, single pilasters each end and double pilasters between bays 2 and 3 and 5 and 6, crossed by hoodmoulds lining through with window heads of ground floor; first floor windows have individual pediments and console bracketted cills, second floor architrave only: to centre bay ground floor pair almost fully glazed doors set in architrave under moulded hood on console brackets. Single storey brick and tiled extension on west side, and other extensions to north. East elevation plainer with lias ashlar and Ham stone dressings; 2-bays, then 3 bays projecting; below plain sash windows, above 12-pane sashes to first floor and 6-pane to second, in plain surrounds with keystones; then low 2-storey wing with plain clay tile roof over stone slate base courses, coped with gable; single bay, with ovolo mould mullioned windows under square labels, a wide 2-light below and 3-light above; pitched roof dormer in roof space. Interior not seen.

Formerly the home of the Mildmay family, lords of the manor, now Junior School of Kings School, Bruton. (Lankester RPA, A History of Hazlegrove House in the Parish of Queen Camel, Somerset, 1958).

Listing NGR: ST5989226914

## Selected Sources

### Books and journals

Lankester, R P A , A History of Hazelgrove House in the Parish of Queen Camel, Somerset, (1958)

### Other

Register of Parks and Gardens of Special Historic Interest in England, Part 37 Somerset,

### Map

**National Grid Reference:** ST 59892 26914

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## List Entry Summary (Published)

This monument is scheduled under the Ancient Monuments and Archaeological Areas Act 1979 as amended as it appears to the Secretary of State to be of national importance. This entry is a copy, the original is held by the Department for Digital, Culture, Media and Sport.

**Name:** Romano-British settlement immediately south west of Camel Hill Farm

**List Entry Number:** 1020936

### Location

The monument may lie within the boundary of more than one authority.

County	District	District Type	Parish
Somerset	South Somerset	District Authority	Queen Camel

**National Park:** Not applicable to this List entry.

**Grade:** Not applicable to this List entry.

**Date first scheduled:** 15-Jul-2003

**Date of most recent amendment:** Not applicable to this List entry.

## Asset Groupings

This list entry does not comprise part of an Asset Grouping. Asset Groupings are not part of the official record but are added later for information.

## List Entry Description

### Summary of Monument

Legacy Record - This information may be included in the List Entry Details.

### Reasons for Designation

Romano-British roadside settlements, as the name suggests, grew up alongside some of the major roads which were laid down following the Roman Conquest of AD43. These roads often had a military origin but later they connected the newly built Roman cities and towns which were the hallmark of Roman civilisation and which sprang forth in the decades following the Conquest when the Romanisation of the country was under way. Those areas most adapted to the Roman way of life saw increased prosperity based upon a market economy in which villas, farms, and towns all played their part. The ability to travel and communicate across the unified Roman province and the need to move and trade produce between towns was clearly important and roadside settlements offering overnight accommodation and facilities for changing horses or pack animals are known to have been in existence on Roman roads from early on in the Roman period. Other settlements between major towns are likely to have become trading posts or small market towns in their own right. Excavation of the roadside settlement at Fosse Lane, Shepton Mallet, in Somerset has produced evidence of a flourishing occupation by the fourth century which was taking advantage of its location between Bath and Ilchester. Further up the Fosse Way towards Bath, excavation of another roadside settlement at Camerton has revealed a scatter of buildings the majority of which are of stone and of simple rectangular plan. The most prosperous period for this type of settlement in the South West appears to have been in the third and fourth century. The Romano-British settlement immediately south west of Camel Hill Farm, although its full extent is not known, appears to parallel in style and date those roadside settlements excavated at Shepton Mallet and Camerton. The monument is known from partial excavation to preserve archaeological information which will be informative about the level of prosperity and the economy of the Romano-British period of the third and fourth centuries as well as providing insights into the lives of the inhabitants of the settlement.

### History

Legacy Record - This information may be included in the List Entry Details.

### Details

The monument includes the recorded extent of a Romano-British settlement of late second/early third to fourth century AD date which is located just to the north of the modern A303 on Camel Hill. The settlement location commands extensive views in all directions particularly to the west where it overlooks the Somerset Levels.

The site was first identified by a geophysical survey leading subsequently to archaeological excavation which revealed the presence of several Roman-style buildings and at least one cremation burial. Pottery evidence also revealed an occupation phase in the early Iron Age (perhaps seventh to sixth century BC) but no certain buildings associated with this earlier occupation were recorded. The excavation, in the form of evaluation trenches, was conducted in 1993 by Wessex Archaeology on an area adjacent to the A303 on its northern side. The A303 is believed to preserve the

road line of the Roman road between Andover and Ilchester (Roman Lendinae). The stone foundations of at least three buildings were recorded, one of which was of substantial construction with a recorded width of around 5.5m. The wall foundations were found to have survived in good condition and they were interpreted by the excavators as dwarf footings for timber-framed structures. The most extensive building exposed contained at least three rooms and an exterior metalled surface indicated the presence of a yard associated with one of the smaller buildings. In addition, a Romano-British cremation burial was encountered at the eastern end of the area explored by trenching. The cremated bone had been placed in a pottery vessel sealed by a limestone roofing tile and set within a small pit.

The partial excavation at Camel Hill has demonstrated the presence of Roman buildings covering an area of at least 130m in length flanking the northern side of what is considered to be the route taken by a major Roman road leading into Ilchester; such occupation is usually indicative of a roadside settlement. This settlement lies only 7km north east of the Roman town of Ilchester upon which it may have been dependent for its economic survival. The density of the Romano-British rural settlement around Ilchester has long been known and research in the latter part of the 20th century has suggested that Ilchester, by the third century, may have become a subsidiary civitas capital (administrative centre) for an area occupying the former northern tribal territory of the Iron Age Durotriges in what is now Somerset. The earlier civitas capital of the Durotriges at Dorchester in Dorset appears to have continued to function in the same administrative role but perhaps for a smaller area from the third century onwards. It may be significant that the settlement at Camel Hill appears to commence fully in the third century during the period of Ilchester's suspected enhanced political status.

All modern fencing and fence posts are excluded from the scheduling, although the ground beneath these features is included.

#### MAP EXTRACT

The site of the monument is shown on the attached map extract.

#### Selected Sources

##### Books and journals

Leach, P, Roman Somerset, (2001), 52-83

##### Other

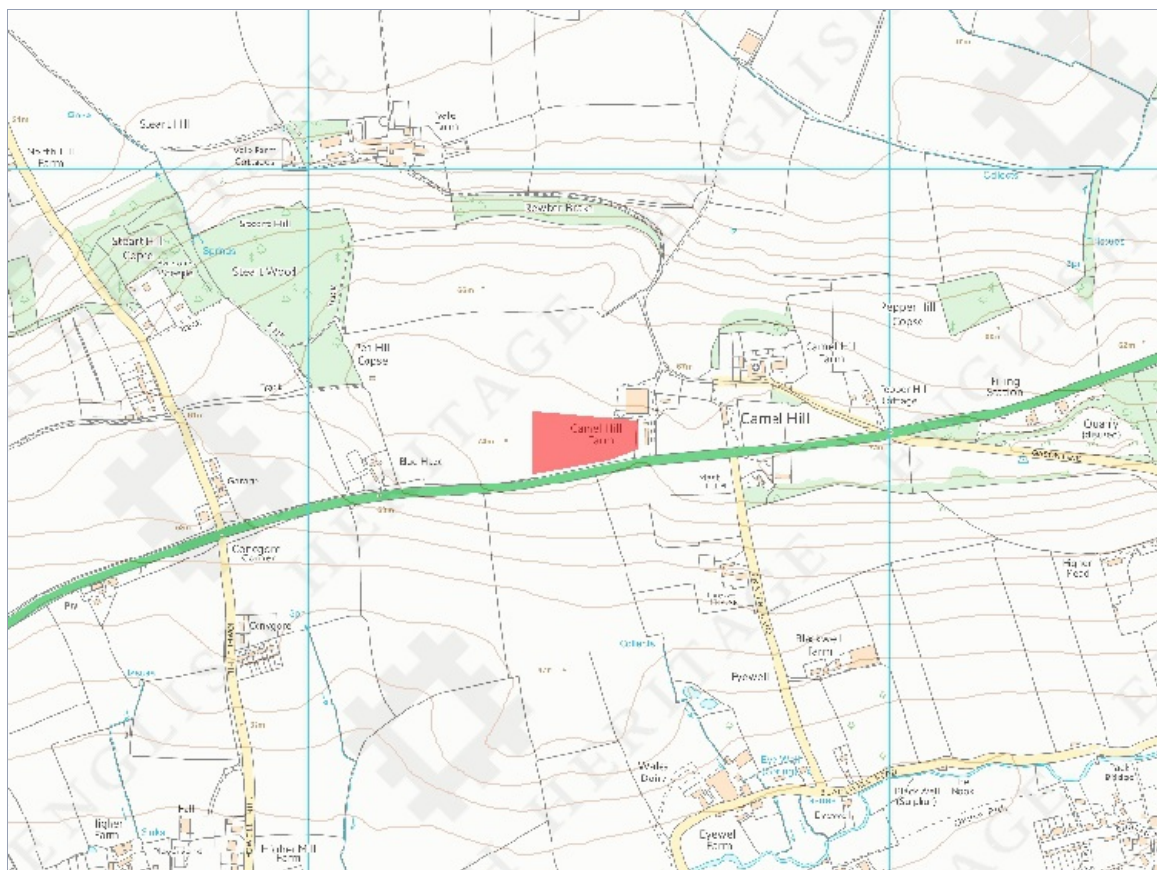
Noel, M J, A303 Sparkford-Ilchester Road Improvement Geophysical Surveys, 1993, GeoQuest Associates, unpub report

Wessex Archaeology: report W530.02, Coe, D and Seager-Smith, R and Newman, R, A303 Sparkford-Ilchester Road Improvement Archaeological Eval, (1993)

#### Map

#### National Grid Reference: ST 58473 25535

The below map is for quick reference purposes only and may not be to scale. For a copy of the full scale map, please see the attached PDF - [17548.pdf](#)



This copy shows the entry on 21-Jan-2019 at 09:59:26.



## List Entry Summary (Published)

This monument is scheduled under the Ancient Monuments and Archaeological Areas Act 1979 as amended as it appears to the Secretary of State to be of national importance. This entry is a copy, the original is held by the Department for Digital, Culture, Media and Sport.

**Name:** Medieval settlement remains 100m and 250m north of Downhead Manor Farm

**List Entry Number:** 1021260

### Location

The monument may lie within the boundary of more than one authority.

County	District	District Type	Parish
Somerset	South Somerset	District Authority	West Camel

**National Park:** Not applicable to this List entry.

**Grade:** Not applicable to this List entry.

**Date first scheduled:** 22-Dec-2003

**Date of most recent amendment:** Not applicable to this List entry.

## Asset Groupings

This list entry does not comprise part of an Asset Grouping. Asset Groupings are not part of the official record but are added later for information.

## List Entry Description

### Summary of Monument

Legacy Record - This information may be included in the List Entry Details.

### Reasons for Designation

Medieval rural settlements in England were marked by great regional diversity in form, size and type, and the protection of their archaeological remains needs to take these differences into account. To do this, England has been divided into three broad Provinces on the basis of each area's distinctive mixture of nucleated and dispersed settlements. These can be further divided into sub-Provinces and local regions, possessing characteristics which have gradually evolved during the last 1500 years or more.

This monument lies in the West Wessex sub-Province of the Central Province, an area characterised by large numbers of villages and hamlets within countrysides of great local diversity, ranging from flat marshland to hill ridges. Settlements range from large, sprawling villages to tiny hamlets, a range extended by large numbers of scattered dwellings in the extreme east and west of the sub-Province. Cultivation in open townfields was once present, but early enclosure was commonplace. The physical diversity of the landscape was, by the time of Domesday Book in 1086, linked with great variations in the balance of cleared land and woodland.

The earthworks which represent the shrunken remains of Downhead medieval settlement survive well and are a good example of this class of monument. Downhead settlement has been occupied continuously from at least the mid-11th century down to the present day, having considerably declined, or shrunk leaving the still occupied farmstead of Downhead Manor Farm and a few cottages to the south. The history of Downhead village is well-documented and its ownership can be traced without interruption from its pre-Domesday origins. Large parts of the medieval village lie undisturbed by later occupation or cultivation and will contain archaeological deposits and environmental evidence relating to the monument and the wider landscape in which it was constructed.

### History

Legacy Record - This information may be included in the List Entry Details.

### Details

The monument, which lies in two separate areas of protection, includes the earthwork remains of part of a medieval settlement which is situated to the north west of West Camel. The site occupies an area of level ground below the steep western slope of West Camel Hill, which lies to the east, and the gentle slope of Annis Hill, to the west. The earthwork remains represent the areas of abandonment caused by the shrinkage of Downhead village, a settlement of pre-Domesday (AD 1086) date. The site is roughly rectangular in plan with the long axis following a north to south alignment, gradually sloping downwards to the north. The areas which continue to be occupied in modern times are situated immediately to the south of the abandoned areas of the settlement.

The remains of the abandoned area are represented by earthworks located in two fields which lay either side of a modern single-track road. The earthworks in the area to the north and west of the road form the major area of scheduling and are situated in a single field, partly enclosed by

a low bank which is most distinct towards the southern end of the site. The earthworks indicate the sites of former houses, including a possible manor house, outbuildings and paddocks, together with hollow ways which represent streets and access lanes. A substantial hollow way, which is visible as a depression up to 0.75m deep and up to 4m wide, extends northwards through the centre of the earthworks and appears to be a continuation of the present single-track road which serves Downhead Farm. A further hollow way runs westwards at right angles to this and at least one house site lies within the angle formed by the two hollow ways. This is visible as a raised platform about 30 sq m and between 1m and 1.5m high. A relatively level area, which is defined on the north and east sides by the two hollow ways, and on the south side by the raised house platform, is probably the garden or toft area associated with the dwelling. Further earthworks located adjacent to either side of the former village street indicate the sites of additional abandoned dwellings and paddocks. An inverted 'L' shaped fishpond is located towards the northern end of the site. The fishpond, which is still water-filled, is steep-sided and measures 12m across at its widest point and is approximately 80m in length.

Also included in the monument are further earthworks which form part of the abandoned area of the medieval village and these are located to the south east of the modern road. They represent the sites of two dwellings which lie adjacent to the road; both are visible as raised platforms about 1m in height with rounded corners. The most northerly of the platforms is overlain by the remains of a more recent dwelling which was dismantled during the later part of the 20th century. A linear feature, visible as a depression with a bank on its higher, eastern side, runs parallel with the eastern side of the house sites and continues northwards to join the substantial hollow way which extends through the northern area of the settlement. A small field or paddock is defined by the bank on the east side of the southern part of the hollow way and this was probably associated with the abandoned house sites.

The settlement can trace its history to before the Norman Conquest. It was already in existence at the time of the Domesday assessment in 1086 and formed part of the estate of Muchelney Abbey. By 1280 the settlement was in private hands and, in 1297, was owned by Henry de Lorty II. In 1358 the manor of Downhead was made over to Alexander Camel and William Derby who subsequently granted it to Muchelney Abbey to provide a chaplain for the abbey church. The land was predominantly arable from the beginning of the 14th century (at which time, six tenants and four cottars are recorded) to at least the 15th century and it is likely that the sale of the manor precipitated the decline and dispersal of the ancient holdings in the parish.

In 1791 the manor was known to have comprised eleven dwellings which were all located on either side of the village street in the area to the south of the abandoned parts of the village which suggests that abandonment had occurred before that date. The manor of Downhead was subsequently sold to Richard Webb in 1825.

All telegraph poles, stone cattle troughs, gate posts, fence posts and fencing are excluded from the scheduling although the ground beneath these features is included.

#### MAP EXTRACT

The site of the monument is shown on the attached map extract.

#### Selected Sources

##### Books and journals

Dunning, R W , The Victoria History of the County of Somerset, (1974), 72-77

##### Other

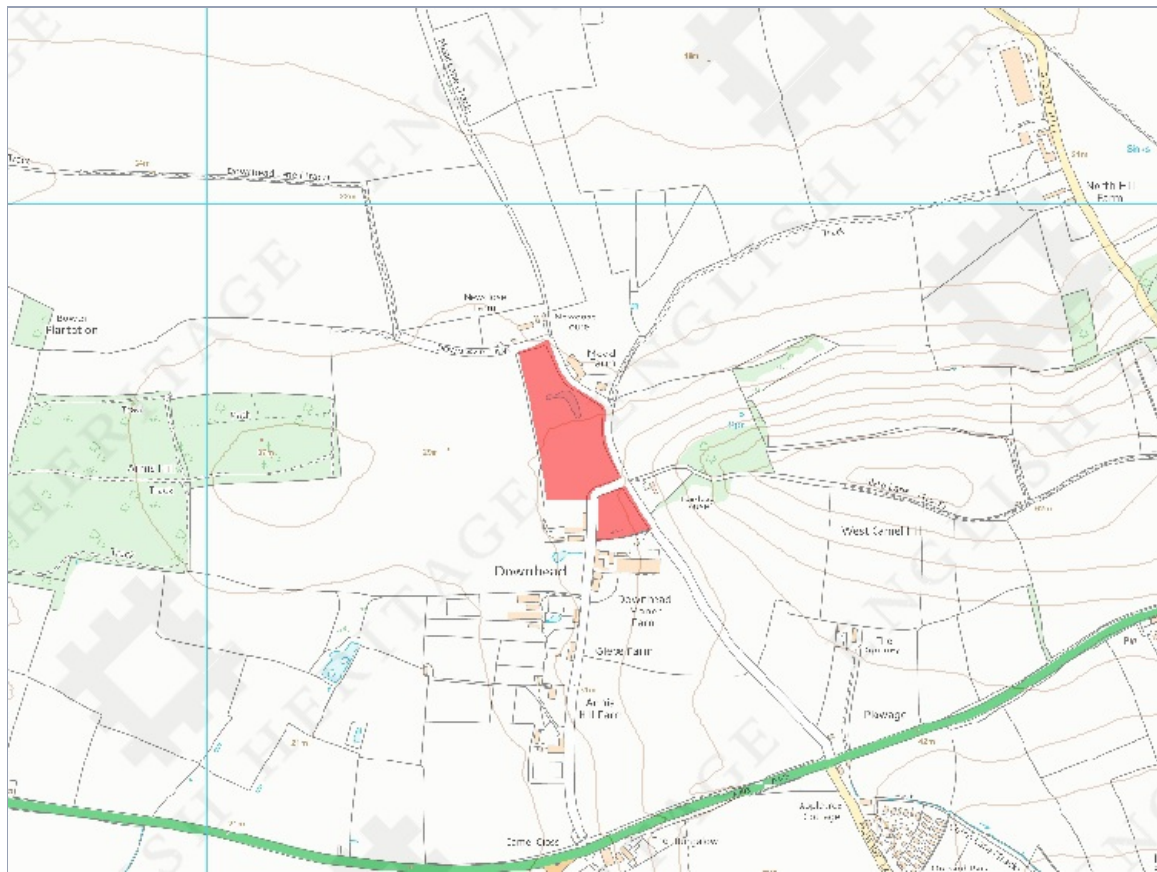
Somerset 54640,

#### Map

**National Grid Reference: ST 56624 25590, ST 56718 25471**

The below map is for quick reference purposes only and may not be to scale. For a copy of the full scale map, please see the attached PDF - [17795.pdf](#)





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## List Entry Summary (Published)

This building is listed under the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended for its special architectural or historic interest.

**Name:** MILESTONE ON A303 AT NGR ST57892538

**List Entry Number:** 1345996

### Location

MILESTONE ON A303 AT NGR ST57892538, A303

The building may lie within the boundary of more than one authority.

County	District	District Type	Parish
Somerset	South Somerset	District Authority	West Camel

**National Park:** Not applicable to this List entry.

**Grade:** II

**Date first listed:** 16-Aug-1984

**Date of most recent amendment:** Not applicable to this List entry.

## Asset Groupings

This list entry does not comprise part of an Asset Grouping. Asset Groupings are not part of the official record but are added later for information.

## List Entry Description

### Summary of Building

Legacy Record - This information may be included in the List Entry Details.

### Reasons for Designation

Legacy Record - This information may be included in the List Entry Details.

### History

Legacy Record - This information may be included in the List Entry Details.

### Details

ST52NE WEST CAMEL CP

2/140 Milestone on A303 at NGR  
ST57892538

-

- II

Milestone. Probably early C19. Ham stone pillar with cast iron plaque.  
Pillar trapezoid plan 800mm - 460mm wide x 150mm thick and 850mm high;  
shaped plaque set on wider face, and reads "Castle Cary 6 ½, Ilchester  
4". On road administered by the Ilchester Trust from 1753 to 1874.

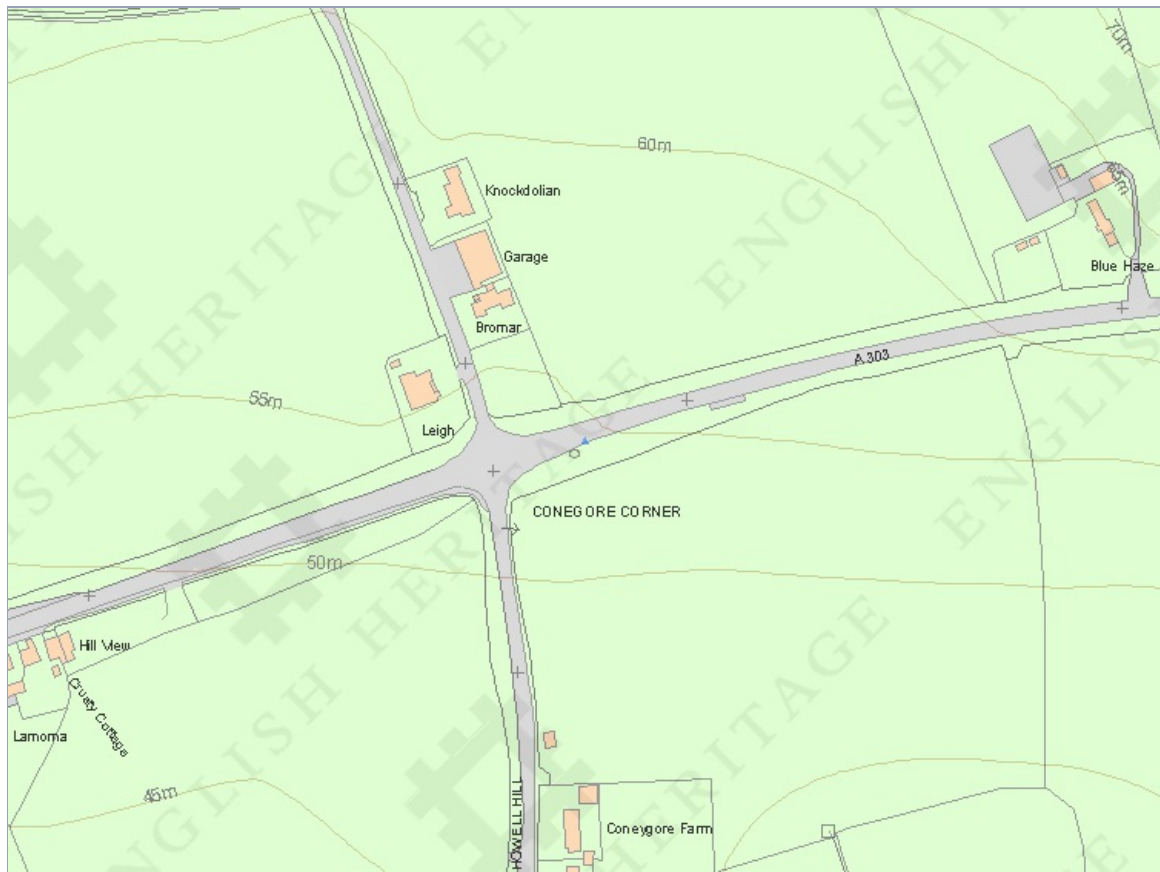
Listing NGR: ST5789025380

## Selected Sources

### Map

**National Grid Reference:** ST 57890 25380

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**APPENDIX B**

**Site walkover minutes, 15/03/17**

**Hazlegrove Grade II Registered Park and Garden Site Walkover with Heritage Consultees – Meeting Minutes****Wednesday 15<sup>th</sup> March 2017****Attendees:**

MMS: Julia Barrett (Principal Environmental Coordinator), Sophie Bennett (Environmental Coordinator), Claire Uden (Principal Landscape Architect), Monica Ghimire (Engineer), Jo Janik (Senior Archaeologist), and Josh Williams (Heritage Team Leader).

Historic England: Phil McMahon (Inspector of Ancient Monuments), Kim Austin (Heritage at Risk Landscape Architect).

South Somerset District Council: Andrew Tucker (Conservation Officer), Robert Archer (Landscape Architect).

**Apologies:**

Hannah Nelson (Regional Environmental Advisor, Highways England)

Jenny Kent (Volunteer, The Gardens Trust)

**Recorded by:**

Sophie Bennett

**Key points/issues raised during the walkover:**

- Initially a concern from consultees that due to the early stages of the Scheme and lack of environmental assessment work available, informed opinions and feedback would not be able to be made. Jo's detailed aerial survey transcription plans and knowledge of the site, however, installed reassurance to the consultees that extensive research has been taking place, and will continue. Consultees were also comforted by the fact that their feedback from this site walkover would be incorporated into the Stage 2 Environmental Assessment Report which helps to inform the preferred option.
- The possibility of setting the existing A303 and Option 1 within false cutting to reduce adverse effects on the setting of the Registered Park and Garden was discussed – this was generally seen as a positive mitigation measure and would go some way in ensuring that the existing setting of the Registered Park and Garden was retained, but also has the potential to even be an improvement on the current situation. Option 2 was generally seen to have a greater adverse effect on the setting as it would not sit in cutting as easily/effectively.
- The existing Shell petrol station and the Esso petrol station were seen as prominent features from the Registered Park and Garden, resulting in an adverse effect on the setting of the RPG. Reducing this intrusion as part of the scheme (such as through additional planting outside of the scheme extents or use of a more sensitive colour for the canopy, or removal of the petrol station) was generally considered to be a positive intervention that could be delivered by the Scheme. It was noted that any false cutting and associated planting in this location would have to be extremely high to ensure that this was mitigated.
- Off-site planting (i.e. outside of the Highways England boundaries) to further screen the Scheme was seen as a positive mitigation measure to be pursued as part of the Scheme.
- The existing lighting columns at the Hazlegrove Junction were noted as prominent features within the landscape and it was agreed that the inclusion of new lighting around the proposed junctions (for both Option 1 and Option 2) would impact further on the setting.
  - The possibility of reducing the lighting around both the junctions and the stretches of road that would be visible from the Park and Garden was discussed. It was agreed to explore the opportunity of having a departure from standards with Highways England, although the safety risks associated with this departure from standards were noted.
  - Phil McMann (Historic England) explained that he was aware of a departure from standards on the stretch of highway visible from Stonehenge to prevent dark sky intrusion, although the designation of the site as a World Heritage Site was noted as the rationale for this departure in standards.

- Additional opportunities associated with reducing the effects from junction/road lighting included: directional lighting; a reduction in column height (although a greater number may then be required); only lighting at certain times of the day, with dimming and potential switch off during certain hours.
  - The removal of some, if not all, of the existing lighting columns at Sparkford Roundabout and on the approach to the roundabout, to further reduce effects to the setting, would be seen as a positive.
- Generally, the proposed overbridge as part of Option 2 would be much harder to screen (an elevated structure, with associated lighting). However, for Option 1, there would be more opportunities for false cuttings and therefore screening. Option 1 generally seen as the easier of the two options to mitigate against, and would have less of an adverse effect on the setting of the Registered Park and Garden.
- The existing landscape incorporates scattered pockets of woodland, and therefore it was agreed that proposals for additional woodland planting to screen key views from the Registered Park and Garden would not look at odds within the existing setting/detract in any way from the existing setting, provided a sensitive design with appropriate tree species.
- The opportunity for mitigation of effects through the planting of woodland elsewhere was well received. The potential opportunity for Sparkford Copse Trust to manage new areas of woodland in the long term was noted. This was seen as a positive action from all consultees.
- Additional planting of trees within the Registered Park and Garden to compensate for the loss of any trees as a result of the Scheme was identified as a sensible additional mitigation measure.
- An overview of the consultation process was provided. The Consultees agreed to send through further feedback to Julia Barrett by the 29<sup>th</sup> March 2017. It was emphasised that this would not be the only opportunity for the consultees to contribute to the Scheme; there will be the potential for further meetings, perhaps in the format of an Environmental Working Group, to discuss this area as well as the wider Scheme.

## **APPENDIX C**

**Letter 29/03/17: Non-statutory public consultation on shortlisted options.**



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





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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***



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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.

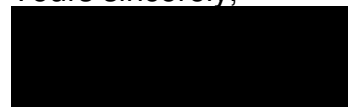
### Historic England preliminary view on Options

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



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**APPENDIX D**

**Letter 14/12/17: HBMCE Scoping opinion.**



Historic England

SOUTH WEST OFFICE

Mr Michael Breslaw  
The Planning Inspectorate  
3D, Temple Quay House  
Temple Quay  
Bristol  
BS1 6PN

Direct Dial: 0117 9750699

Our ref: PL00069502

14 December 2017

Dear Mr Breslaw

**RE: Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017(the EIA Regulations) - Regulations 10 and 11**

**Application by Highways England for an Order granting Development Consent for the A303 Sparkford to Ilchester**

**Scoping consultation and notification of the Applicant's contact details and duty to make available information to the Applicant if requested**

Thank you for consulting Historic England in respect of this request for a scoping opinion. We are broadly content with the proposed assessment methodology set out by the applicant in their EIA Scoping Report, but have the following comments to make in respect of designated heritage assets:

Chapter 7, Cultural Heritage:

7.2 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.

Hazelgrove House Registered Park and Garden - 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



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draw out the history, development and thus significance of this designed landscape, in our formal response to non-statutory public consultation dated 29th March 2017. As the impact upon the RPaG 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 RPaG by earlier researchers, so it is imperative that this cultural heritage assessment provides a solid understanding upon which to base advice.

Yours sincerely,



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

cc: Kim Auston, Historic England Landscape Architect  
Stephen Membery, SW Heritage Trust



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**APPENDIX E**

**E mail 14/03/18:**

**HBMCE comments on Statement of Significance – Hazlegrove House RPG**

**McAllister, Jo**

---

**From:** [REDACTED]  
**Sent:** 15 March 2018 16:00  
**To:** Auston, Kim  
**Cc:** [REDACTED]  
**Subject:** RE: A303 Sparkford to Ilchester Dualling - Environmental TWG - Hazlegrove Registered Park and Garden - minutes and comments

Afternoon Kim

Thank you very much for providing us with your comments on the Statement of Significance, very much appreciated. I have passed these on to Jenny and her team for review. Jenny will update the Statement of Significance accordingly, taking into consideration your below comments and any additional comments received from consultees. The updated Statement of Significance will form a technical appendix to the cultural heritage chapter of the Environmental Statement.

I hope you have a good couple of weeks away and please let me know if you have any questions upon your return.

Best wishes

Sophie

---

**From:** [REDACTED]  
**Sent:** 14 March 2018 20:58  
**To:** [REDACTED]  
**Subject:** Re: A303 Sparkford to Ilchester Dualling - Environmental TWG - Hazlegrove Registered Park and Garden - minutes and comments

Dear Sophie,

It has taken longer than anticipated to review the 62 page Statement of Significance and, as our server shuts down at 9pm (and I am leaving at 5am tomorrow) I've had to draw a line under things and set down my comments now before it's too late. Please would you forward to Jenny Timothy?

Overall I can't fault the depth of research that's gone in to this document. It's also attractively presented. The comments that follow vary from the significant to the minor and I am setting them out more or less in the order they occurred to me (which roughly follows the order of the SoS itself).

Figures 4.1 and 4.2 depict extracts from the 1573 map. A north point would aid orientation. Additionally annotations would aid communication, particularly as some of the original script is indecipherable, at least at the size the map has been reproduced in the document. For example, I couldn't identify which parcel was Coages Park.



Phasing plan. This is something I really missed. I would like to have seen a schematic plan to show how the extent of the park has changed over time. I have seen documents, for instance parkland plans for Stewardship, where this is expressed by perhaps four snapshots of the registered park in time, coloured in to show its extent. This is relevant to Hazlegrove because although there's a lot of 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 you are open about it I don't think it matters. You could start off with the location of the two medieval parks and move forward to, for example, the construction of the A303 in the late 20th century. You will have seen plans of churches coloured in to show different building campaigns; well, that's the kind of thing I think is missing for the park.

Allied to the above, I think 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 at Hazlegrove, you would normally be proposing to reinstate the parkland trees in the most southerly fields. So this departure from 'normal' restoration philosophy as applied to parks needs to be addressed.

Fig 4.3 Annotations on this figure would help make sense of the text in 4.4.2 e.g. locations of the bath house, bastion etc

4.4.5 Is it assumed that the 'new' entrance shown on the 1795 plan in fact dates from the same 1730s campaign at the house? If so, this should be spelt out.

5.2.12 It's implied but not, I think, explicitly stated, that Hazlegrove has 'value' as an exemplar of a typical country house estate

5.3.3 I suspect the avenue DOES survive in part. As I drive along the A303 (approaching the Sparkford roundabout from the east) my eye is always caught by an avenue of trees bisected by the road. Do these belong to another house? They would appear to be roughly in the right position for the 19th century drive.

Why isn't the tithe plan illustrated and comment made about the land use the tithe reveals, particularly in the fields that may be lost under the present scheme?

5.6.8 There's an observation, with which I would agree, about the impact on visitors of an extended approach through the south park. Of course the proposed land take for the A303 provides or provided part of the parkland that contributed to the grandeur of the arrival, but the SoS is pretty silent on the subject.

5.6.12 I disagree that the absence of a named designer at Hazlegrove reduces its significance. Henry Hoare at Stourhead and John Aislabie at Studley Royal were gentlemen amateurs and their designed landscapes are some of the best we have.

1795 'drive'. Are you quite convinced that the last (SW-NE orientation) leg of the 1795 drive i.e. in the vicinity of the present A303 was actually a drive? To me it looks far more like a lane, with the drive being a north turn off it.

I hope you will include LIDAR tiles as part of your evidence base in the appendices.

I would normally have filtered these comments through Phil but as time is of the essence they are coming straight to you. I hope I've not said anything with which Phil would strongly disagree. Equally, I hope the comments are of some use.

Best wishes,

Kim

Kim Auston  
Landscape Architect, Historic England

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**From:** Bennett, Sophie [REDACTED]

**Sent:** 14 March 2018 09:04

**To:** [REDACTED]

**Subject:** RE: A303 Sparkford to Ilchester Dualling - Environmental TWG - Hazlegrove Registered Park and Garden - minutes and comments

Hi Kim

That's no problem at all – I've set up a new FTP site (see log in details below) and uploaded the Statement of Significance to this. Thanks very much in advance for reviewing this and for providing us with your comments, it is much appreciated.

Please let me know if you need anything else.

Kind regards

Sophie

**APPENDIX F**

**E mail 06/08/18: HBMCE comments on OEMP and SoCG.**

## McAllister, Jo

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**From:** McAllister, Jo  
**Sent:** 06 August 2018 15:14  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: A303 Sparkford to Ilchester Dualling - Statement of Common Ground  
**Attachments:** OEMP\_Historic England comments.docx

Hi Jenny,

Thanks for the statement. We consider this is a fair summary of past interaction and advice, and only have one comment, re:

Para 1.2.3: Please add "Historic England is the government's expert advisor on England's heritage and has a statutory role in the planning system. Central to this role is the advice they give to local planning authorities, government departments, developers and owners on development proposals affecting the historic environment".

In response to your previous e mail, we have the following comments:

1. Conservation Management Plan (CMP) for the registered park – We confirm that we would wish to see the production of a CMP included as part of the mitigation proposals for the overall park, particularly in light of the fact that it is on the Heritage at Risk register and the road widening puts it at further risk.
2. Level of harm to the RPG - Based on the proposals presented by yourselves during our site walkover (11/07/18), and the location of the works in relation to the overall park, we consider the level of harm to be 'less than substantial'. We would, however, be keen to see the CMP mitigation factored into this.
3. OEMP comments – Please see attached.

Let me know if you want to discuss anything further.

Regards,

Jo

Jo McAllister  
Heritage at Risk Landscape Architect  
South West & West Midlands Region  
Direct Line: 0117 9752296  
Mobile: 07881 258413

Historic England, 29 Queen Square, Bristol BS1 4ND  
[www.HistoricEngland.org.uk](http://www.HistoricEngland.org.uk)

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**From:** [REDACTED]  
**Sent:** 24 July 2018 15:50  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** A303 Sparkford to Ilchester Dualling - Statement of Common Ground

Phil, Jo,

Please find attached the first copy of the Statement of Common Ground for the A303 Sparkford – Ilchester between Highways England and Historic England. As discussed this is a working document so we can add any more comments and discussions as we go along during the DCO process and before it gets officially signed off.

If you could have a read through and let me know if you have any comments on the record of engagement (section 1.4) and the issues (section 2) as they stand that would be great. We've added in status what we think the current position is on the various comments we've received from you, if you disagree please let me know and I'll amend accordingly. Also if you have any other comments that you feel need addressing at this stage I can add them in.

I'm happy to talk this through in more detail if it would help. Let me know if this would be useful and I'll get a call set up.

Any questions in the meantime give me a shout.

Regards  
Jenny

**Jenny Timothy**

Principal Heritage Consultant

D +44 (0)1223 463975      T +44 (0)1223 463500      F +44 (0)1223 461007

jenny.timothy@mottmac.com



Mott MacDonald  
22 Station Road  
Cambridge CB1 2JD  
United Kingdom

[Website](#) | [Twitter](#) | [LinkedIn](#) | [Facebook](#) | [YouTube](#)

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**APPENDIX G**

**ETWG minutes, 29/11/18**

**Date:** Thursday 29 November 2018 **Time:** 11:00

**Location:** Abbey Manor Business Centre, The Abbey, Preston Rd, Yeovil BA20 2EN

**Attendees:** Phil McMahon (PM) – Historic England  
Jo McAllister (JA) – Historic England  
Jenny Timothy (JT) – Mott Macdonald Sweco Joint Venture  
Julia Barrett (JB) – Mott Macdonald Sweco Joint Venture  
Sophie Bennett (SB) – Mott MacDonald Sweco Joint Venture

**Apologies:** None

No.	Actions / Key Messages	Owner
1.0	<p><b>Safety Moment</b></p> <p>JT provided a Safety Moment in relation to minor accidents that took place a week ago where a car accidentally hit the back of JT's car. JT noted the importance of finding a safe place to stop to swap details.</p>	
2.0	<p><b>DCO Examination Timetable</b></p> <p>JB provided an overview of the current status of the project and the upcoming Examination:</p> <ul style="list-style-type: none"> <li>- Preliminary Meeting and Open Floor Hearing is scheduled to take place on Wednesday 12 December 2018. JA noted that Beth Harries (solicitor, Historic England) would be in attendance for the Preliminary Meeting and Open Floor Hearing.</li> <li>- Within the Rule 6 Letter, the Planning Inspectorate (PINS) have outlined their initial assessment of principle issues.</li> <li>- The Council will produce their Local Impact Report shortly and this will then be available for review.</li> <li>- There are a series of deadlines within the Rule 6 Letter throughout the Examination period.</li> </ul>	
3.0	<p><b>Archaeological Trial Trench Surveys</b></p> <p>JT explained that the trial trench surveys on site were now complete. A copy of the interim report has been received from the archaeological contractor but a complete report is due imminently. PM asked to be sent a copy of this report once complete.</p> <p>JT noted that this report and if necessary, an assessment of the findings in relation to the proposed scheme would be submitted to PINS in the form of 'additional environmental information', as stated within Chapter 6 Cultural Heritage of the Environmental Statement submitted as part of the Development Consent Order (DCO) application in July 2018.</p>	JT
4.0	<p><b>Statement of Common Ground (SOCG)</b></p>	

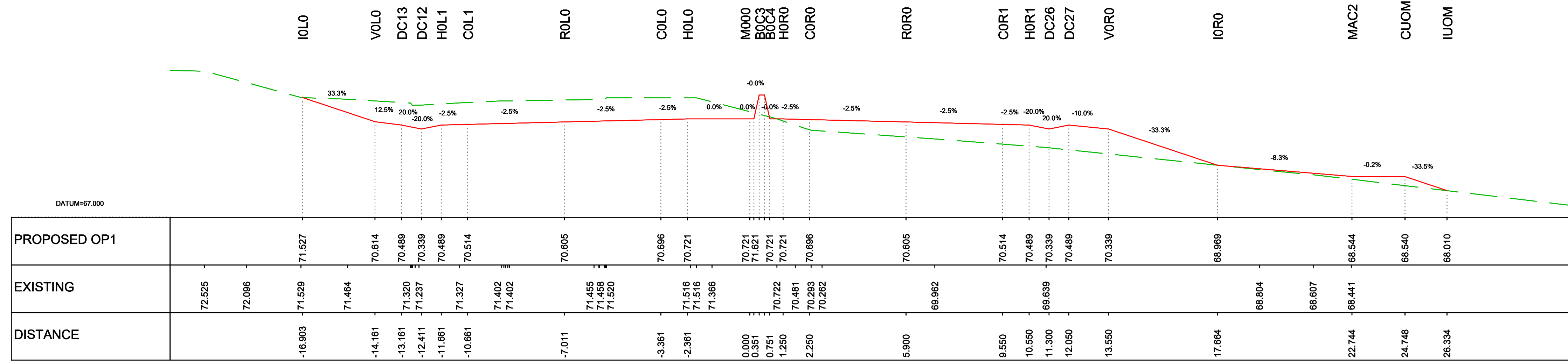
No.	Actions / Key Messages	Owner
	<p>The SOCG was reviewed on screen.</p> <p>PM to provide some text that further describes Historic England's role, to add to Chapter 1.</p> <p>PM and JM noted that references to meeting minutes should be amended to 'meeting notes' and should also be appended to the SOCG.</p> <p>Issues section of the SOCG:</p> <ul style="list-style-type: none"> <li>- PM requested the production of a phasing plan of the Registered Park and Garden, to help demonstrate the impact and the mitigation. JT's team to develop this plan and submit to PM and JM for review and comment. Include the agreement to produce a phasing plan in the SOCG.</li> <li>- PM and JM requested the production of an Outline Historic Environment Mitigation Strategy (or similar) as per the one produced for the A303 Stonehenge team, to ensure that the construction phase essential mitigation required as part of the scheme was captured. JB and JT noted that this would approach would be discussed with Highways England.</li> </ul> <p><b>Post meeting note:</b> <i>Following discussions with the Highways England project team, Mott Macdonald Sweco Joint Venture (MMS) JV suggest that instead of producing an Outline Historic Environmental Mitigation Strategy, that MMS JV bring the production of the Written Scheme of Investigation (for which there is a commitment currently in the OEMP to be produced by the appointed Contractor) forward, and produce the WSI during the Examination period. This will capture everything in terms of essential mitigation during construction, and will be proportionate in terms of our approach. To capture the essential operational mitigation, we suggest that the Outline Landscape and Ecological Management Plan (LEMP) is updated within the OEMP during the Examination period, to include a historic environment element. Writing this into the OEMP (as an appendix but also within the Register of Environmental Actions and Commitments) will then provide additional security to ensure that the historic environment is considered once the scheme is operational.</i></p> <ul style="list-style-type: none"> <li>- The 'seriousness' wording used to describe Hazlegrove Junction to be amended by JT.</li> <li>- PM requested that a photomontage is produced from the front of Hazlegrove Preparatory School. JB said that she would discuss this with Highways England as the additional costs associated with producing this would need to be agreed.</li> </ul> <p><b>Post meeting note:</b> <i>JB, JT and the Mott MacDonald Sweco Joint Venture's Lead Landscape Architect visited this area during a site visit on 30 November 2018. Photographs to be issued to Historic England to agree an approach.</i></p>	<p>PM</p> <p>JT / SB</p> <p>JT</p> <p>JB / JT</p> <p>JT</p> <p>JB</p> <p>JT</p> <p>JB</p> <p>MMS JV</p>
5.0	<p><b>Conservation Management Plan (CMP)</b></p> <p>JT explained that developing the CMP as part of the main scheme</p>	



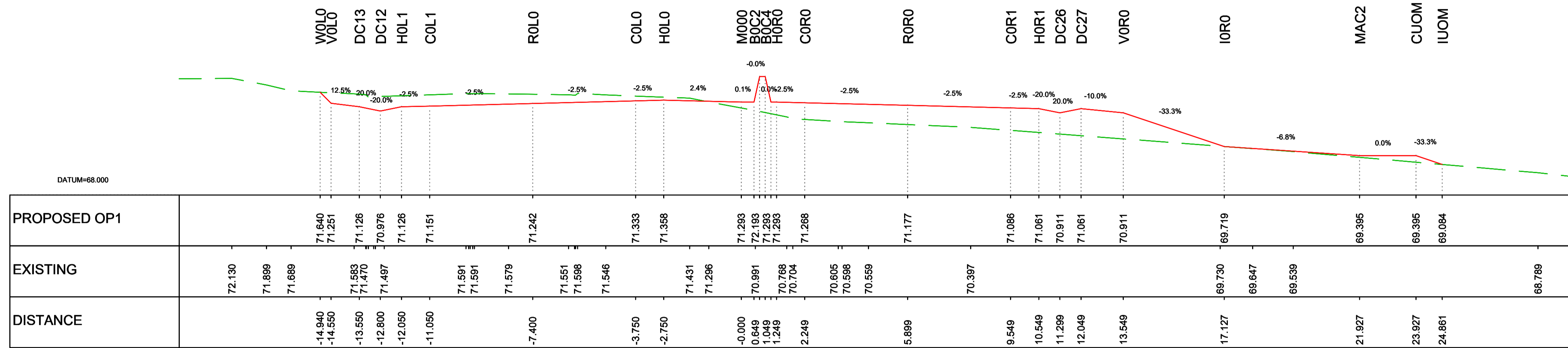
No.	Actions / Key Messages	Owner
	<p>would mean the report would be limited. JT explained that the outline environmental management plan (OEMP) was considered to cover the direct mitigation and that the CMP would allow the whole RPG to be included rather than just where work would directly mitigate the scheme. However, if the CMP is to be developed under a Memorandum of Understanding (MOU), then the CMP can have a much broader scope.</p> <p>It was noted by PM and JM that a MOU held no contractual binding within the DCO process. Highways England's legal opinion is to be sent to Historic England as soon as possible, and following this JT to develop and circulate with PM and JM a MOU.</p>	JT
6.0	<p><b>Camel Hill Scheduled Monument</b></p> <p>PM asked for a photomontage from the south west corner to assess the full impact the proposed scheme may have on the setting of this asset</p> <p><i>Post meeting note: JB, JT and the Mott MacDonald Sweco Joint Venture's Lead Landscape Architect visited this area during a site visit on 30 November 2018. Photographs to be issued to Historic England to agree an approach.</i></p>	MMS JV
7.0	<p><b>Hazlegrove Registered Park and Garden</b></p> <p>JM and PM noted concerns in relation to the proposed school drive and the engineered nature of this drive on plan view. PM and JM would like to see the school access drive to be as little engineered as possible. JT explained that on plan the access did look particularly straight but taking into account the topography and the existing and proposed planting / other aspects of the scheme, the driveway would not appear as engineered.</p> <p>Concerns to be added to the SOCG.</p> <p>JT to include in the CMP measures to enhance the attenuation pond to make this look less engineered.</p>	JT JT
8.0	<p><b>Outline Environmental Management Plan</b></p> <p>Comments received from Historic England on the OEMP were reviewed in turn and the master version of the OEMP updated.</p> <p>JM and PM noted that their solicitor is still to look through the OEMP.</p>	JM / PM

**APPENDIX H**

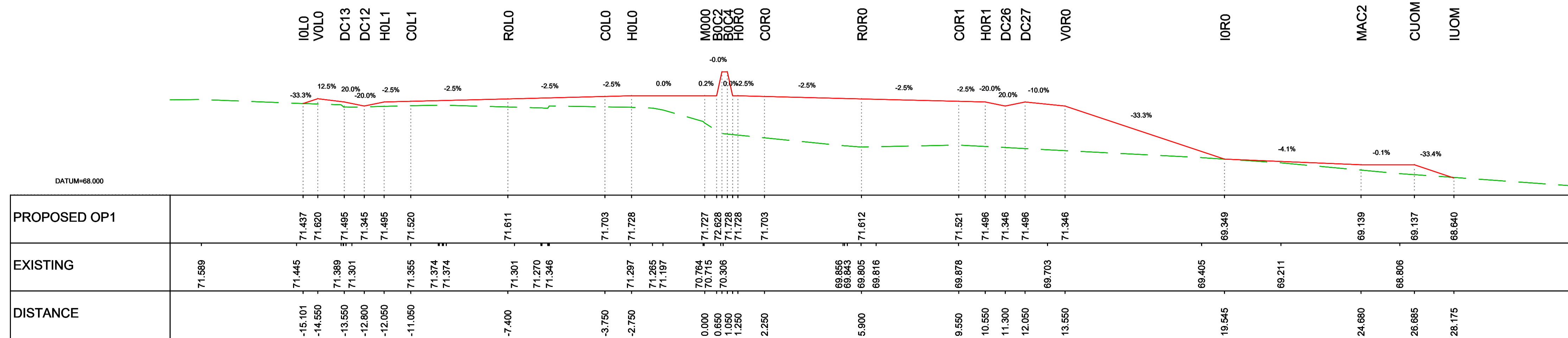
**Hazlegrove Junction cross sections (circulated by Applicant on 27/11/18)**



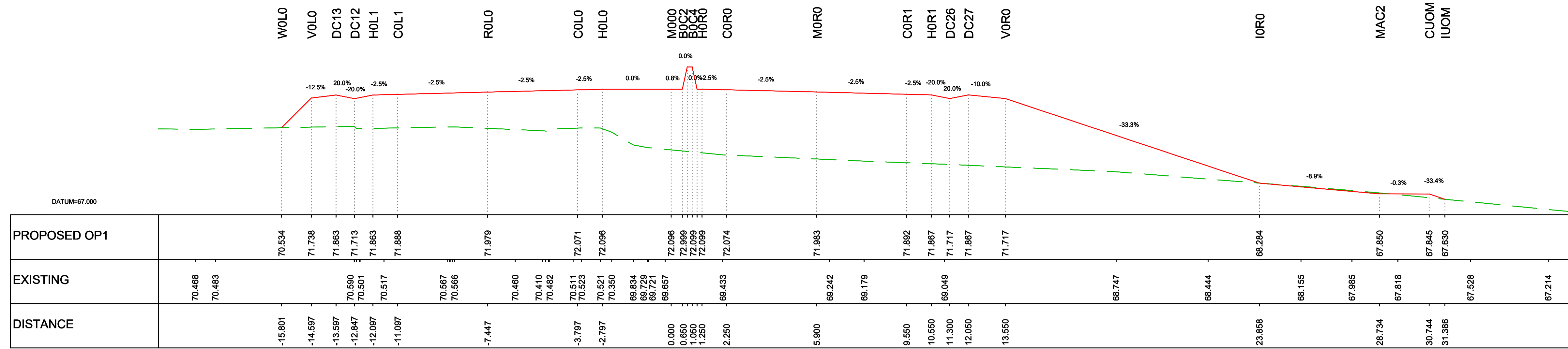
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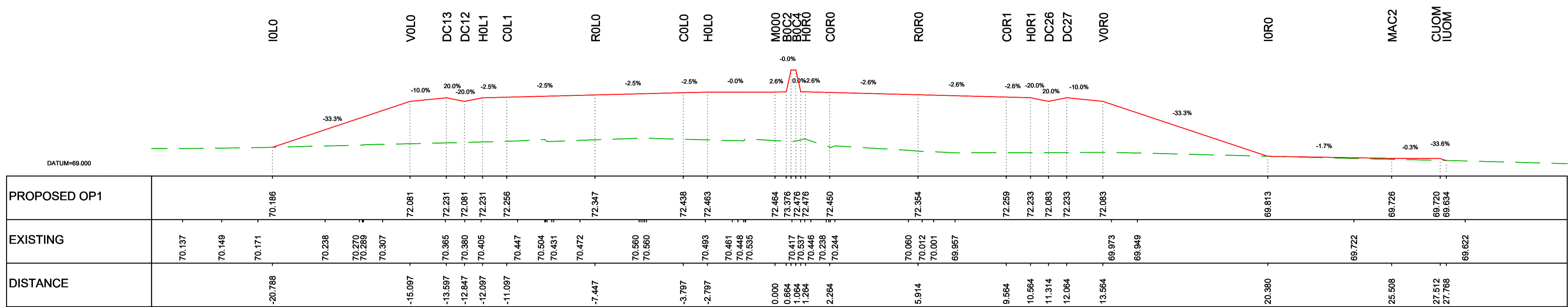
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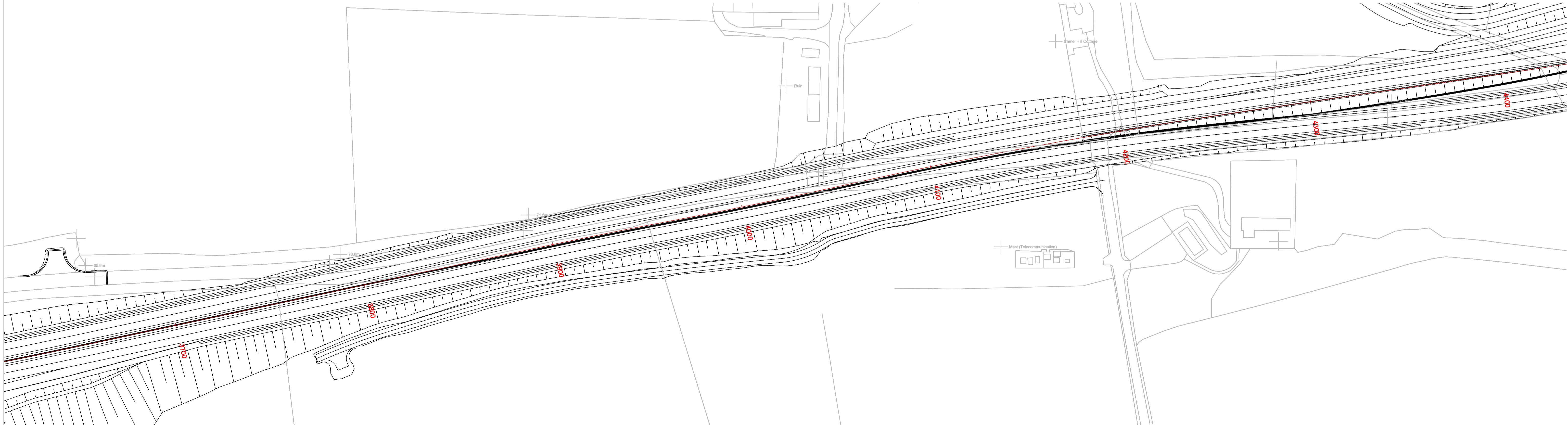
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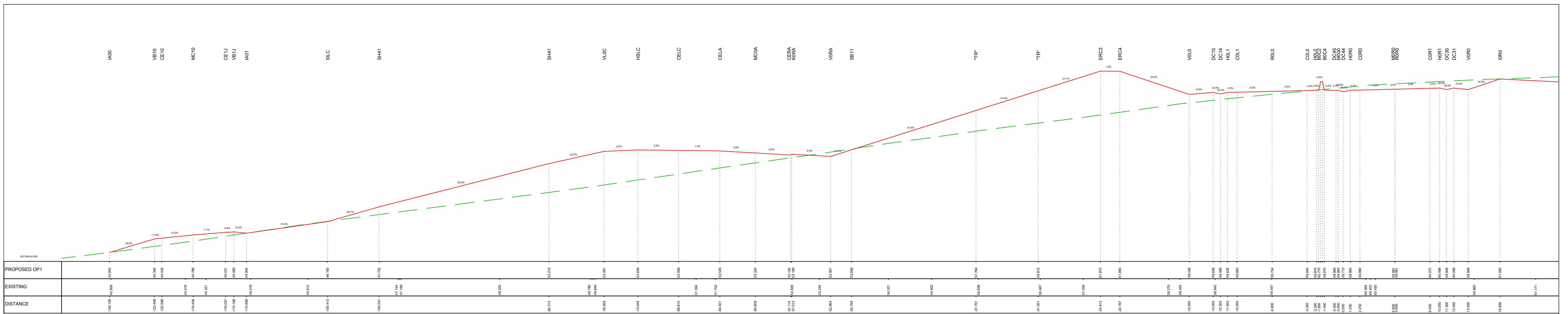


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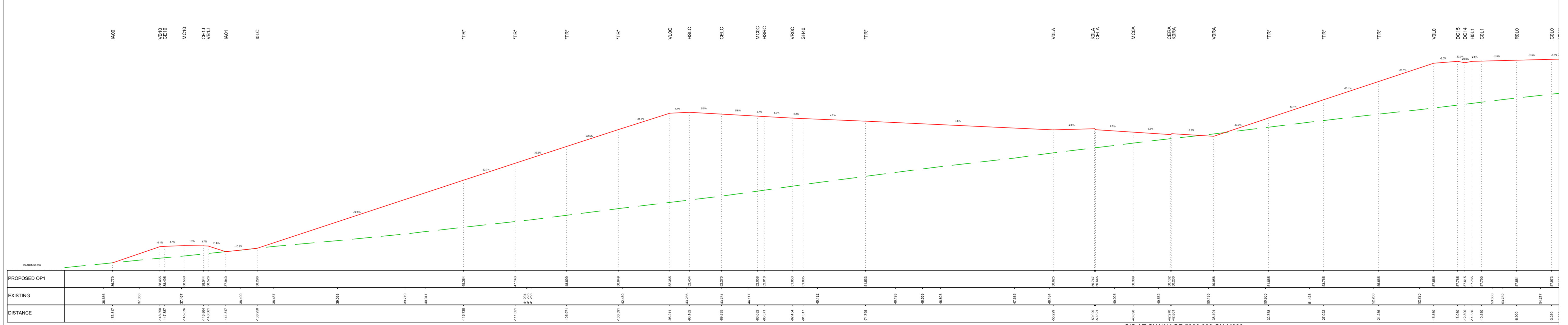




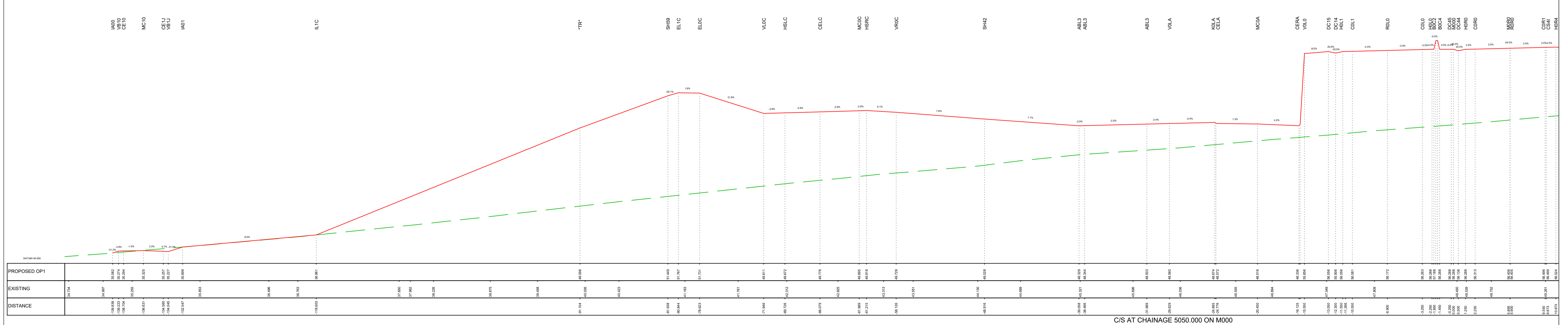




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