



Historic England

**SUMMARY
OF 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**

WRITTEN REPRESENTATION - SUMMARY

- 1.1. The following statement provides a summary of the Written Representations prepared by the Historic Buildings and Monuments Commission for England¹ (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. As stated in our Section 56 Relevant Representation, HBMCE's interest is focused upon the following designated heritage assets, due to the significant environmental effects we have identified in our own assessment of the impact of the Scheme:
 - (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.
- 1.3. HBMCE was established under the National Heritage Act 1983 and is the Government's principle adviser on England's heritage and has a statutory role in the planning system. 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. HMBCE'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 this Scheme.
- 1.4. HMBCE's Written Representations set out in more detail our role and scope of the representation. It also goes into detail on the proposals and our involvement

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.

with the Scheme, the statement of common ground, the significance of the heritage assets; and assessment of impact, and provides comments on the draft Development Consent Order.

1.5. HBMCE was approached by the Applicant in early 2017 and it was understood at that time that the proposal was to dual a section of the A303 between Ilchester and Sparkford. A summary of the subsequent consultation undertaken between HBMCE and the Applicant, since 2017, is set out in the Statement of Common Ground (SoCG). Whilst we are presently unable to agree on all matters within the SoCG, a draft has been circulated and its contents are under discussion. This is dealt with in more detail in Section 6 of our Written Representations. 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.

1.6. As set out in the Written Representations, HBMCE have focused on three designated heritage assets - Hazlegrove House Registered Park and Garden; Camel Hill Scheduled Monument and Downhead Manor Farm Scheduled Monument. These are taken in turn below. We understand that the Local Authority will be picking up on other heritage assets in their representations.

Hazlegrove House Registered Park and Garden (RPG)

1.7. This is a grade II registered park and garden and is a c.70 ha site comprising formal gardens, pleasure grounds and parkland. It is 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. 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 survives well.

- 1.8. HBMCE considers that the Scheme will have a negative environmental effect on the significance of this asset. 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 which provides the main approach into the park and to Hazlegrove House.
- 1.9. 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, and long distance views from the drive out of the park, notably to the west towards Glastonbury Tor.
- 1.10. 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.
- 1.11. As part of the discussions for the Scheme, which included more detail to the proposal and the location of the works in relation to the overall park, we considered the level of harm to be less substantial. We advised that we needed to see the Conservation Management Plan (CMP) mitigation factored into the assessment. The CMP is currently under discussion and it is our view that 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. Further detail on this can be found in Section 7.5 of the Written Representations. We also highlighted the need for further information regarding the detailing of the Scheme, set out in Section 6 of the Written Representations, which relate to the ongoing discussions as part of the SoCG.

Camel Hill Scheduled Monument

- 1.12. The 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. 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 full extent of the 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.

Downhead Manor Farm Scheduled Monument

- 1.13. The medieval settlement remains which comprise this monument lie in two separate areas of protection. The earthwork remains indicated the sites of former houses, including a possible manor house, outbuildings and paddocks and hollow ways. Together they represent the areas of abandonment caused by the shrinkage of Downhead village (a settlement of pre-Domesday (AD1086) date and are a good example of this class of monument.

Issues arising in relation to Camel Hill and Downhead Manor Farm Scheduled Monuments

- 1.14. Overall HBMCE considers the Scheme will have a negative environmental effect on the significance of both the Camel Hill and Downhead Manor Farm Scheduled Monuments. That effect will result from the harm caused to the contribution made to the significance of the scheduled monuments by their setting. The elements of setting contributing to the significance of these monuments comprise the surrounding landscape, associated with their 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.

1.15. 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 association with the Roman road to Ilchester (in the case of Camel Hill), the change in character on adjacent land associated with ecological mitigation (in the case of Downhead), and the impact of factors such as noise and dust on the experience of being within the scheduled monument.

Specific Issues - Camel Hill

1.16. 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 would 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.

1.17. 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. HBMCE also await clarification of the extent, positioning and form of the buffer zone that is proposed and has also requested an outline archaeological and historic

environment mitigation strategy (together with a revised draft OEMP and draft WSI – refer further to Section 6 of the Written Representations, which highlights these and other issues under discussion as part of the Statement of Common Ground. 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.

Specific Issues – Downhead Manor Farm

1.18. The level of any harm caused will depend on the significance of any remains identified and the physical impact of the works. As noted in the Written Representations, there is a potential for the proposed ecological mitigation works (Works 39 and 40) to have an evidential impact from 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.

1.19. The results of archaeological investigation and detail of work proposals for the ecological mitigation strategy are required to inform an the assessment of the level of potential impact.

1.20. In regard to all three designated heritage assets outlined above, it is HBMCE's view that it is not yet possible to provide a final assessment of the effects of the impact of the Scheme since there is outstanding information, as noted above and in more detail in the Written Representations, required to complete that assessment.

Environmental Statement

1.21. HBMCE reviewed the Environmental Statement (ES), primarily focusing on *Chapters 6 Cultural Heritage* and *Chapter 7 Landscape* and their associated

appendices. We identified the following issues for consideration by the Examining Authority in relation to the three assets which are the focus of HBMCE representations:

- (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, due to the permanent land-take and impact of new landscape features;
- (c) Information and reports relevant to the examination of the Scheme which are awaiting submission. For example, the results of the archaeological evaluation of the proposed northern haul road bordering Camel Hill Scheduled Monument.

1.22. In summary, in relation to the above points, we note as follows:

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

1.23. In relation to Hazlegrove House Registered Park the mitigation measures proposed and their assessment did not take into account various aspects of the Scheme – ie. the introduction of new features into the RPG, including the attenuation basin, engineered bunds and culvert opening (east of Bund 7), level of screening, and impact of temporary work compounds.

1.24. In relation to Camel Hill and Downhead Manor Farm scheduled monuments it would be appropriate to ensure that those undertaking the work would have clarity on how to handle archaeological remains as this would have been set out in the WSI as part of the mitigation being proposed. However this is still subject to discussion (refer further to Section 7.5 in the Written Representations).

(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:

1.25. In light of the new features introduced into the RPG (see para 1.23 above) 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. We consider, based on the ES assessment criteria, that the long term effect on the landscape character would remain moderate adverse (refer further to Section 7.5 in the Written Representations).

(c) Information and reports relevant to the examination of the Scheme which are awaiting submission:

1.26. The ES's 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 (refer further to Section 7.5 in the Written Representations).

1.27. HBMCE set out in Section 8 of the Written Representations its comments on the draft Development Consent Order (DCO). Overall, HBMCE is keen to ensure that where appropriate mitigation measures are required to address the issues highlighted by HBMCE that they 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 CMP for the RPG at Hazlegrove House, and an archaeological and historic environment mitigation strategy for any designated and non-designated assets that may be affected. Following submission of a revised draft DCO we will review its contents and reserve the right to amend or add comments which we have made in the representations as a consequence of such revision.

1.28. HMBCE consider that there are important issues requiring action and clarification by the Applicant in order to inform the assessment of impact and significance of effect of the Scheme on these designated heritage assets. HMBCE will continue to discuss with the Applicant these issues in the interests of identifying solutions to the range of issues highlighted in the Written Representations concerning the avoidance and minimisation of harm to the historic environment that arises under the Scheme.