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Subject: RE: TR010036 - Deadline 4
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Attachments: [imagecbbad7.PNG](#)
[image1149dc.PNG](#)
[imagea8c962.PNG](#)
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[South Somerset District Council's Comments on the Applicant Report 9.11.pdf](#)
[South Somerset District Council's Comments on the Applicant Report 9.13.pdf](#)

Dear Ms Coffey

**PLANNING ACT 2008
APPLICATION BY HIGHWAYS ENGLAND FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR THE A303 SPARKFORD TO
ILCHESTER DUALLING**

SUBMISSION MADE PURSUANT TO DEADLINE 4

This submission is in response to the Examining Authority ("ExA") Rule 8 letter dated 21st December 2018 and comprises the relevant information requested from South Somerset District Council.

The submission includes the following: -


- South Somerset District Council's comments on Highways England's documents 9.11 and 9.13 submitted at D3, and
- South Somerset District Council's D4 Hearing Point Actions




We note that a revised/updated draft Statement of Common Ground is also requested at this stage. We have worked with the applicant and Somerset County Council to produce this document and understand that the applicant will be making the submission.

Yours sincerely

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A303 Sparkford to Ilchester Dualling Submission for Deadline 4

South Somerset District Council's Comments on the Applicant's Deadline 3 Submission - 9.11 Responses to Local Impact Report, Written Representations and comments on responses to the Examining Authority's Written Questions (REP3-003)

1.7 Cultural heritage

Hazlegrove Conservation Management Plan

Paragraphs 1.7.4 and 1.7.5 are considered misleading. The “*moderate adverse effect*” identified in paragraph 1.7.4 refers to the operation effect for the Hazlegrove House RPG Group (GR11) and disregards the permanent construction impacts, as set out in 6.1 Environmental Statement Chapter 6 Cultural Heritage and summarised below:

- Temporary construction impacts: Temporary large adverse effect.
- Permanent construction impacts: Permanent large adverse effect.
- Operation impacts: Moderate adverse effect.

The ‘Summary of In-combination Effects on Cultural Heritage’ document (REP3-005) produced in response to ExA’s Question 1.1.9 confirms the combined effect as being ‘Large Adverse’.

The in-combination effect for the Hazlegrove House Group (GR05) is also relevant, which is also significant being ‘Moderate Adverse’.

Furthermore, the response in paragraphs 1.7.4 and 1.7.5 is inconsistent for the area under consideration. For determining the effect the whole RPG is taken into consideration (i.e. the loss of 14% of the designated RPG; the physical impacts in the southern end of the RPG with the loss of historic driveways, earthworks, copse, boundaries, and veteran trees; the impact on the setting of the RPG and listed Hazlegrove House; the existing degradation to arable use in Rawlins’s Close; and the previous truncation from the construction of the Sparkford bypass).

This enables the judgement of harm under the National Policy Statement to be moderated by the scale of the whole RPG and the previous detrimental changes, with the conclusion being ‘less than substantial harm’.

When considering appropriate mitigation, the assessment is restricted to the southern end of the heritage asset where the proposed scheme has a direct physical impact. Paragraph 1.7.5 states that “*the whole RPG is not impacted by the project and so a CMP covering the entire RPG would not be related in scale and kind to the effects of the development*”.

However, the assessment of harm has concluded that the special historic interest of the RPG as a whole has been impacted and the mitigation measures should be considered on the same parameters. The loss of parkland, loss of significant historic

features, and changes to the RPG and Hazlegrove House settings will affect the character and integrity of the whole RPG.

A conservation management plan for the RPG is thus maintained as appropriate mitigation.

Hazlegrove Lane

In paragraph 1.7.19 the Applicant states that the significance of Hazlegrove Lane had been considered in section 6.4 of the Hazlegrove House RPG Statement of Significance (APP-068). This amounts to *“The 1795 driveway appears to be a north turn off the existing lane which led to Hazlegrove House”*.

There is no discussion on the function and history of this route, which also demarks the boundary between the parishes of Sparkford and Queen Camel and continues to be defined by the PRoW. The visible alignment and extant features of the lane will be lost under the lower embankment of Bund 7.

The lack of a proper assessment of Hazlegrove Lane is a notable flaw in the Statement of Significance. However, information on the significance of this historic lane would unlikely alter the design of the proposed scheme.

Pond 5

Regarding paragraph 1.7.27, no explanation has been provided as to why Pond 5 cannot be sited outside of the RPG.

Bunds 6 and 7

The landscape cross sections will be useful in understanding the impact of the earthworks and screening measures for the southern end of the RPG.

Driveway realignment

Paragraph 1.7.31 states that *“Historically the driveways through the park took the most direct route”* and Paragraph 1.7.32 that *“The landscaping is considered to present a sense of arrival which is sympathetic with the historic arrival to the house through the RPG”*.

Whilst it is accepted that the historic driveways of different phases comprised of curving and long straight sections, they did not form the most direct route. Rather, the driveways took a broadly central route through the landscaped parkland and achieve the desired approach to the house.

The proposed section of new driveway passes uncomfortably close to the remnant of the southern (Peaked Close) coppice and area of adjacent extended woodland. A more comfortable alignment would be towards the centre of the southern field.

Paragraph 1.7.32 provides a credible description of the route from the Hazlegrove off slip, but this is unlikely to achieve a sense of arrival due to the asymmetric layout of

the planting, the switching lines of fencing, and the Pond 5 infrastructure. Historically the sense of arrival was achieved by emerging cleanly from the cluster of trees at Peaked Close and later more grandly through the Triumphal Arch Gateway. It's unclear with the new scheme if the point of arrive will be at the Hazlegrove off slip turning, on emerging on one side from the screen planting, or at the junction with the Pond 5 track.

1.9 Landscape

Visual Receptors 25, 27, 28 and 38

Regarding paragraph 1.9.3, the assessment of the effects for VR No. 38 was challenged on the grounds that it did not consider the adverse effect of an environmental barrier on the character of the RPG.

Paragraph 1.9.3 states that *“the presence of the proposed environmental barrier is considered in the assessment (the assessment refers to a 2 m timber fence...)”*.

Whilst the 2 m high barrier is referred to in the Visual Baseline and Impact Schedules, this is with reference to Year 1 when the planting has not had time to establish. Hence Year 1 being judged to have a Moderate Adverse effect. The assessment for Year 15 is Slight Adverse. The reduced impact being on the assumption that established planting will effectively screen the timber barrier and other align features. This is unlikely due to the limited depth of planting, the gap for a drain, and leaf fall for 6 months of the year. Therefore, the adverse impact of the environmental barrier is missing for Year 15.

The Applicant acknowledges the unsuitability of environmental barriers to rural locations in its response to ExA's Q 1.1.32: *“Any additional barriers, such as fencing, will have an additional impact on setting as they will not reflect the rural character of the property”*.

9.11 Legal Points

In respect to the District Council functions, the hearings have moved these points forward.

A303 Sparkford to Ilchester Dualling Submission for Deadline 4

South Somerset District Council's Comments on the Applicant's Deadline 3 Submission - 9.13 Summary of In-combination Effects on Cultural Heritage (REP3-005)

This is a useful document for summarising the long-term impacts of the scheme. The following observations are made in line with previous comments:

GR11: Hazlegrove House RPG Group

The description of the in-combination effects identifies a loss of 10.6 hectares from the RPG. This figure would rise to approximately 13.7 hectares if the fenced area of attenuation Pond 5 and its associated infrastructure were included.

MM103: Turnpike Road Martock to Sparkford

As raised in the LIR, the magnitude of impact for the permanent works is considered to be underestimated due to the scale of alteration for the historic road alignment. Therefore, the in-combination effect is disputed.

To date there has been little deviation of the modern A303 from the turnpiked road. This will change with the historic route being segregated into disjointed sections, with some lengths remaining on-line and others incorporated into link roads. The character of the road corridor will be substantially altered through realignment, widening, substantial earthworks and visual separation from the landscape with extensive planting. Interpreting the historic route on the ground will be difficult and can no longer be traversed.

It is recognised that reassessment of the effects for this asset would unlikely alter the design of the proposed scheme.

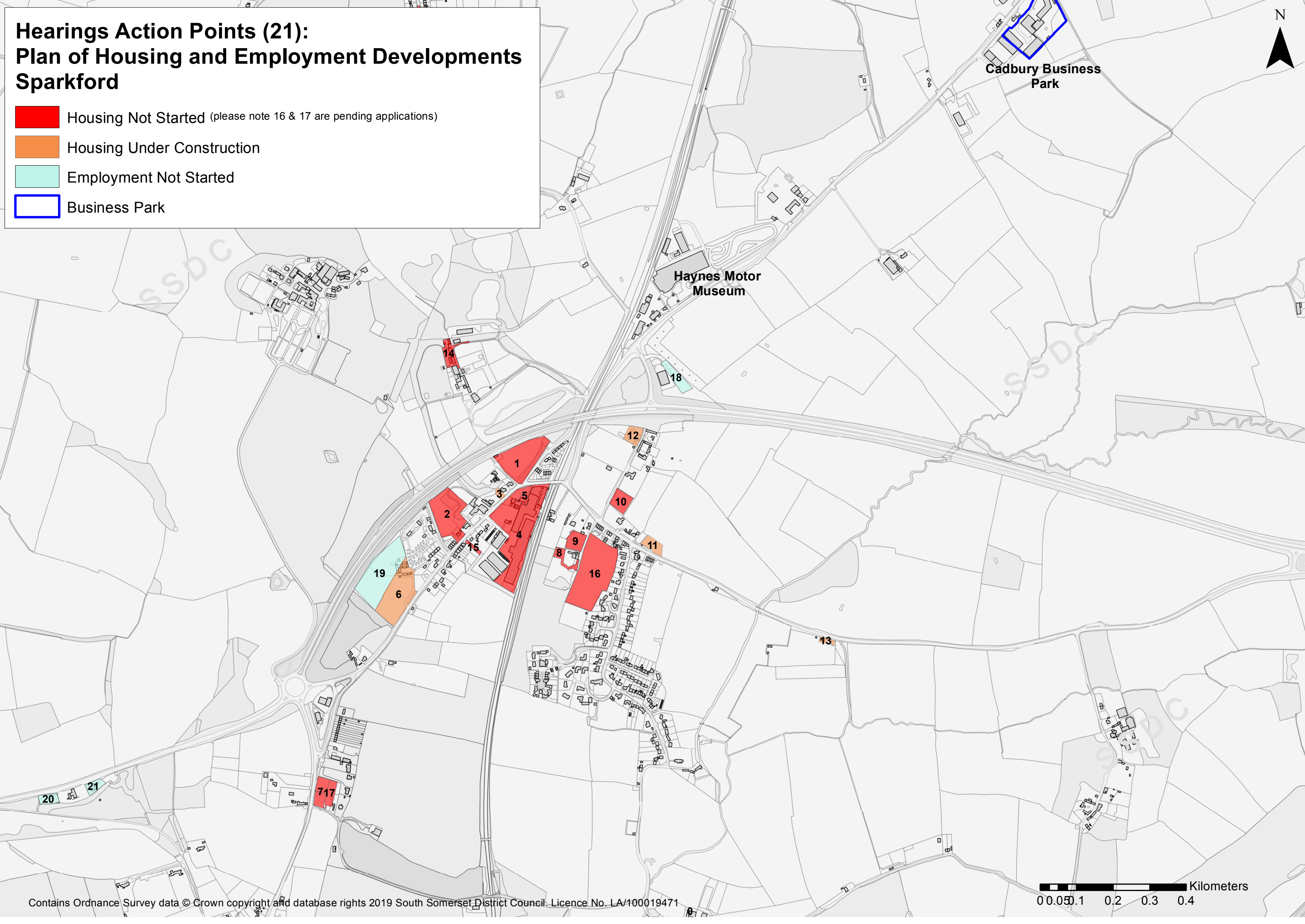
MM273b Bakery of West Camel

As raised in the LIR, the magnitude of impact the permanent works is considered to be underestimated as the realignment of the A303 will remove the bakery's historic location alongside a main through-route, thus fundamentally alter its relationship with its setting and threaten its historic use.

It is recognised that reassessment of the effects for this asset would unlikely alter the design of the proposed scheme.

Hearings Action Points (21): Plan of Housing and Employment Developments Sparkford

- Housing Not Started (please note 16 & 17 are pending applications)
- Housing Under Construction
- Employment Not Started
- Business Park



Key to Map Hearings Action Points (21): Plan of Housing and Employment Developments.

Map Ref Number	Proposal	Application number	Address	Status
1	Application for 5 new dwellings to include details of appearance, landscaping and scale (16/01436/OUT)	17/04618/REM	Land Os 4859 off A303 Sparkford, Yeovil	Not Started
2	Residential development of 11 dwellings	14/05052/FUL	Land Os 3432 Rear of the Burrows, High Street, Sparkford	Not Started
3	Erection of a detached dwelling with attached garage and formation of vehicular access	12/01836/FUL	Land adj The Roundhouse, High Street, Sparkford	Not Started
4	Outline planning Application seeking permission for mixed use redevelopment 48 dwellings (residential/commercial) together with associated works and access ways, retaining 2260m ² for employment on site.	16/00725/OUT	Haynes Publishing, High Street, Sparkford	Not Started
5	Change of use from office to 1 dwelling.	16/00726/COU	Home Farmhouse, ,High Street, Sparkford	Not Started
6	Development of 35 dwellings with associated parking and landscaping	17/02044/FUL 17/02045/FUL	Longhazel Farm, High Street, Sparkford	Under Construction
7	The erection of 4 No. dwellings and construction of vehicular access thereto	17/04916/OUT	Land adj Fletched Moss, Sparkford Hill Lane, Sparkford	Not Started
8	The erection of a bungalow	18/01065/FUL	The Orchard, Cherry Pie Lane, Sparkford	Not Started
9	The erection of 3 No. dwellings and associated access.	17/01442/FUL	The Orchard, Cherry Pie Lane, Sparkford	Not Started
10	Outline application for the erection of 2 dwellings	18/02227/OUT	Land South West Of Brooklands House, Brains Lane	Not Started
11	Application for three dwellings to include details of access, appearance, landscaping, layout and scale.	17/02840/REM	Land OS 9032 Part Old London Road, Sparkford	Under Construction
12	Application 1 dwelling to include details of access, design, landscaping, layout and scale.	17/03001/REM	Land Opposite Brooklands Barn, Brains Lane, Sparkford	Under Construction
13	The erection of an agricultural/horticultural worker's dwelling.	15/02459/FUL	Vale of Camelot Growers, Old London Road, Sparkford	Under Construction

14	The erection of 1 No. dwelling and detached garage.	17/02213/FUL	Land adj Barlely Cottage, High Street, Sparkford	Not Started
15	Proposed conversion of former milking parlour to 1 dwelling	15/03227/FUL	Barns to the Rear of Sparkford Hall, Sparkford Road.	Not Started
16	Residential development for up to 36 dwellings and use of part of site for village hall and associated works	18/00810/OUT	Land at Cherry Pie Lane, Sparkford	Pending
17	Erection of 2 No. dwellings and construction of vehicular access thereto (Outline).	18/03536/OUT	Land adj Fletcher Moss, Sparkford Hill Lane, Sparkford	Pending
Employment				
18	The erection of an industrial building.360m ² floor space.	17/03340/FUL	Land Off A359 & A303 Slip Road, Sparkford,	Not Started
19	Development of flexible B1, B2 and B8 commercial floor space with associated parking and landscaping. 2297m ² floor space & 1.3ha new land.	17/02046/FUL	Land at Long Hazel Farm, High Street, Sparkford	Not Started
20	The erection of a single storey drive through coffee shop with associated access and parking.	18/00197/FUL	Land adj Shell Filling Station, Camel Hill, Queen Camel	Not Started
21	Demolition of petrol filling station, forecourt and ancillary retail unit. The erection of a replacement petrol forecourt, retail unit and ATM with associated parking.	18/00218/FUL	Shell Filling Station, Camel Hill, Queen Camel	Not Started

North Cadbury Business Park only has 1 outstanding planning permission on Unit E – Change of use form B1 to Sui Gen which has not started.