

# A303 Sparkford to Ilchester Dualling Scheme TR010036

## 8.6 Draft Statement of Common Ground with Somerset Drainage Board Consortium

APFP Regulation 5(2)(q)  
Planning Act 2008

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

March 2019



Infrastructure Planning

Planning Act 2008

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

A303 Sparkford to Ilchester Dualling Scheme  
Development Consent Order 201[x]

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**DRAFT STATEMENT OF COMMON GROUND**


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

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Rev 0	July 2018	Application Issue
Rev A	January 2019	Submission for Deadline 2
Rev B	March 2019	Submission for Deadline 4
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**STATEMENT OF COMMON GROUND**

This Statement of Common Ground has been prepared and agreed by (1) Highways England Company Limited and (2) Somerset Drainage Boards Consortium.

  
Signed.....  
Hannah Sanderson  
Senior Project Manager  
on behalf of Highways England  
Date: March 2019

  
Signed.....  
Roger Burge  
Chief Executive and Clerk to the Board  
on behalf of Somerset Drainage Boards  
Consortium  
Date: March 2019

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## **1 Introduction**

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

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

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

- 1.2.1 This SoCG has been prepared by (1) Highways England as the Applicant and (2) Somerset Drainage Boards Consortium.
- 1.2.2 Highways England became the Government-owned Strategic Highways Company on 1 April 2015. It is the highway authority in England for the strategic road network and has the necessary powers and duties to operate, manage, maintain and enhance the network. Regulatory powers remain with the Secretary of State. The legislation establishing Highways England made provision for all legal rights and obligations of the Highways Agency, including in respect of the Application, to be conferred upon or assumed by Highways England.
- 1.2.3 The Somerset Drainage Boards Consortium (SDBC) manages the operations and affairs of the Axe Brue and Parrett Internal Drainage Boards. The organisation was formed in April 2005 and was formed to give the boards access to professional engineering, financial and administrative services. The individual boards remain the legal corporate bodies that retain the powers and duties that fall to them from the Land Drainage Act 1991.

### **1.3 Terminology**

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

between the parties. As such, those matters can be read as agreed, only to the extent that they are either not of material interest or relevance to Somerset Drainage Boards Consortium.

## 2 Record of Engagement

2.1.1 A summary of the meetings and correspondence that has taken place between Highways England and Somerset Drainage Boards Consortium in relation to the Application is outlined in Table 2.1.

Table 2.1: Record of Engagement

Date	Form of correspondence	Key topics discussed and key outcomes (the topics should align with the Issues tables)
23 January 2018	Meeting (Somerset Drainage Boards Consortium)	Road Drainage and the Water Environment. Existing and proposed drainage strategy introduced. Discussions were held with respect to water quality and water quantity offsite. Volume as well as peak rates were a concern and should be incorporated within the strategy (minutes contained within Appendix A).
3 April 2018	Email, from Somerset Drainage Boards Consortium to Highways England	Comments on draft Drainage Strategy plans. Proposed drainage strategy plans were shared and subject to comment from the Somerset Drainage Boards Consortium. Highways England responded to the comments, confirming: the design criteria and standards used; the provision for attenuation, treatment and discharge of runoff; the maintenance and access to drainage features; and the future condition assessments required for the receiving watercourse.
24 April 2018	Report, Statutory Consultation	Environment. Proposed drainage strategy plans were shared and subject to comment from the Environment Agency, Somerset County Council, Somerset Drainage Board Consortium and the public. An allowance for climate change was confirmed. It was also agreed that a maintenance plan for SuDS would be produced within detailed design.
8 May 2018	Environmental Technical Working Group (Environment Agency and Somerset Drainage Board Consortium)	Overview of the Flood Risk Assessment and update on preliminary design drawings. Discussion and agreement to produce combined SoCG with regards flood risk and drainage.
4 October 2018	Environmental Technical Working Group (Somerset Drainage Board Consortium invited although did not attend due to lack of outstanding issues.	Update on scheme process following submission of the Development Consent Order application in July 2018.

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

### 3 Issues

Topic	Stakeholder Comment	Highways England Response	Status
Water quantity	Confirmation is sought that the proposed design will control the overall volume, as well as the overall rate of runoff with sufficient attenuation provided.	Attenuation has been provided, with discharge limited to 1% annual exceedance probability (1 in 100-year event) plus 40% to account for the effects of climate change (Flood risk assessments: climate change allowances, Environment Agency), to no greater than the undeveloped rate of runoff, determined by the calculation of the mean annual peak rate of runoff for a greenfield site (Qbar).  Preliminary design discharge rates and volumes shown in Outline Drainage Works Plans (APP-106).	<b>AGREED</b>
Water quality	Confirmation is sought that the proposed pond design provides effective water quality treatment with the use of a permanent water level, and that this volume is sufficient in size.  It is recommended that the SuDS Manual (C753) is referred to in the calculation of these permanent volumes, as well as the detailed design of the forebays and vegetation that will be essential for water treatment.	A permanent water level has been provided for each of the proposed ponds. The volume of treatment has been provided in accordance with the SuDS Manual (C753) - '10-15 millimetres of rainfall depth falling over the contributing catchment'.  Accepted.  Appropriate planting has been considered as part of the landscaping assessment and design.  Attenuation feature discharge rates and volumes shown in Outline Drainage Works Plans (APP-106).	<b>AGREED</b>
	The use of grassed surface water channels is supported. Confirmation is sought to where they will be located.	Grassed line channels have been incorporated where the carriageway is in cutting.  Evidenced in Drainage Strategy Report, included with Environmental Statement Appendix (APP-060).	<b>AGREED</b>



Topic	Stakeholder Comment	Highways England Response	Status
		As in accordance with Outline Drainage Works Plans (APP-106).	
Maintenance and access	<p>There is concern that there is not adequate space provided for adequate and effective maintenance of the ponds and ditches.</p> <p>It is recommended that maintenance tracks are provided, ensuring connectivity to the ponds and ditches.</p> <p>To undertake a full de-silt of the ponds a maintenance strip greater than 4m is required. Further information needs to be supplied on this at the detailed design stage.</p>	<p>A grassed 4 metre maintenance strip has been provided around each pond and along each ditch. Additional access tracks have been provided to provide access to the ponds.</p> <p>As in accordance with Outline Drainage Works Plans (APP-106).</p>	<b>NOT AGREED</b>
	<p>There is concern that the maintenance tracks do not provide access to the control structures, which would need to be maintained and accessed in the event of a large pollution incident.</p>	<p>Accepted.</p> <p>The ponds and maintenance tracks have been redesigned to provide access to these structures.</p> <p>Access shown in Outline Drainage Works Plans (APP-106).</p>	<b>AGREED</b>
Existing watercourses and structures	<p>There is concern for the condition of the existing watercourse that the existing A303 drains into, with known issues with some of the existing culverts.</p> <p>It is recommended that the condition and capacity of the flow route from the proposed outfalls are checked until the flow reaches a main river or watercourse, maintained by an Internal Drainage Board. The size and condition of existing culverts should be checked and repaired where necessary.</p>	<p>Accepted</p> <p>The proposed scheme utilises the existing outfall locations. Through implementation of the proposed drainage strategy the rate of discharge will be limited creating a betterment. It is noted that a condition survey has not yet been undertaken and this will be undertaken at subsequent design stages.</p>	<b>AGREED</b>

## **Appendix A**

A303 Somerset Drainage Board meeting minutes are shown overleaf.



**A303 Sparkford to Ilchester Dualling  
Road Drainage and the Water Environment**

<b>Date:</b>	23 January 2018	<b>Time:</b>	9:30
<b>Location:</b>	Somerset Drainage Board Consortium Bradbury House, Market St, Highbridge TA9 3BW		
<b>Attendees:</b>	Simon Bunn (SB) – Development Control Officer, Somerset Drainage Boards Consortium Dan Martin (DM) - Service Manager, Flood Risk Management Somerset District Council (LLFA) Tom Lake (TL) – Drainage Lead, Mott MacDonald Sweco		
<b>Apologies:</b>	John Southwell (JS) – Environment Agency		

No.	Actions/Key Messages	Owner												
<b>1.0</b>	<b>Introduction</b>	All												
	<p>Overview of the preferred route and key dates:</p> <table border="1"> <tr> <td>November 2017</td> <td>EIA Scoping Report submitted to the Planning Inspectorate (PINS)</td> </tr> <tr> <td>January 2018</td> <td>Receipt of Scoping Opinion from PINS</td> </tr> <tr> <td>January to March 2018</td> <td>Statutory Consultation</td> </tr> <tr> <td>March 2018</td> <td>Design amendments following feedback from the Statutory Consultation</td> </tr> <tr> <td>January to June 2018</td> <td>Environmental Statement and additional environmental deliverables.</td> </tr> <tr> <td>July 2018</td> <td>DCO submission</td> </tr> </table>	November 2017	EIA Scoping Report submitted to the Planning Inspectorate (PINS)	January 2018	Receipt of Scoping Opinion from PINS	January to March 2018	Statutory Consultation	March 2018	Design amendments following feedback from the Statutory Consultation	January to June 2018	Environmental Statement and additional environmental deliverables.	July 2018	DCO submission	
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March 2018	Design amendments following feedback from the Statutory Consultation													
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July 2018	DCO submission													
<b>2.0</b>	<b>Drainage Philosophy</b>													
	<p>A summary of the existing drainage design, known flooding issues and proposed drainage design was given.</p> <p>Approximately 60% of the existing carriageway is unattenuated. The proposed drainage strategy has been developed to date to reduce post development peak runoff rates to the equivalent greenfield response up to and including the 1% Annual Exceedance Probability (AEP) event (+ 40% allowance for climate change).</p>	TL												

No.	Actions/Key Messages	Owner
	<p>Attenuation would largely be provided through open storage basins with permanent ponds to aid water quality treatment. Linear features would be used where possible to collect, treat, store and convey water as close to source as possible.</p> <p>The proposed storage basins have currently been designed with 1:4 slopes, with 750 millimetre effective storage depth. Need for impermeable liner to be determined upon confirmation of seasonal groundwater levels (ground investigation to inform).</p> <p>Post development, the overall peak runoff rates from the A303 would reduce, although there would be an increase in the volume of runoff due to the additional impermeable area.</p> <p>SB declared that the Somerset Drainage Board Consortium (SDBC) would seek to impose a reduction in flow rates and volume.</p> <p>TL / SB confirmed in practice this is delivered through the provision of 'long-term-storage' limiting offsite discharge to 2 l/s/ha or QBAR for all.</p> <p><i>[Post meeting notes for completeness:]</i></p> <div style="background-color: #e0f2f7; padding: 10px; margin: 10px 0;"> <p><b>S4. Where reasonably practicable, for greenfield development, the runoff volume from the development to any highway drain, sewer or surface water body in the 1 in 100 year, 6 hour rainfall event should never exceed the greenfield runoff volume for the same event.</b></p> <p><b>S5. Where reasonably practicable, for developments which have been previously developed, the runoff volume from the development to any highway drain, sewer or surface water body in the 1 in 100 year, 6 hour rainfall event must be constrained to a value as close as is reasonably practicable to the greenfield runoff volume for the same event, but should never exceed the runoff volume from the development site prior to redevelopment for that event.</b></p> <p><b>S6. Where it is not reasonably practicable to constrain the volume of runoff to any drain, sewer or surface water body in accordance with S4 or S5 above, the runoff volume must be discharged at a rate that does not adversely affect flood risk.</b></p> </div> <p>TL to develop strategy considering volume restriction.</p>	
<b>4.0</b>	<b>Opportunities for enhancements</b>	
	<p>TL inquired as to whether any alternative mitigation may prove more beneficial to the catchment response considering a holistic approach to flood risk management. For example, improvements to pumped areas of the catchment.</p> <p>SB to investigate with catchment engineers for any potential opportunities.</p>	SB
<b>5.0</b>	<b>AOB</b>	
	<p>Consenting – under the Land Drainage Act SDBC require application. Although not within the 'boundary' of the Parrett Drainage Board (DB), as the scheme will be discharging to an</p>	

No.	Actions/Key Messages	Owner
	<p>ordinary watercourse contributing to the discharge, there will be the need to apply for consents.</p> <p>TL to investigate through which mechanism this application will be undertaken.</p> <p>SB noted that for Development Consent Order (DCO) applications in the past, there could be legal arrangements drafted to combine LLFA and SDBC powers.</p> <p>DM / SB agreed that working together in best interest for all.</p> <p>TL informed SB / DM that public consultation will be occurring in the next few weeks.</p> <p>SB flagged that 'Garden Town' is a project of interest within the community and to expect queries.</p> <p>DM was keen to understand any concerns raised by the public at the meetings. TL to develop a list and forward as appropriate.</p> <p>TL to pass on named SCC to DM to ensure all communication documented and due process followed.</p> <p><i>[Note post meeting: TL passed on contact name Richard Gorst (RG) as the named SCC engineering representative. All future correspondence to be undertaken through RG. It is planned for a drainage meeting in the next few weeks where DM / TL will update on progress to-date].</i></p>	<p>TL</p> <p>TL</p> <p>TL</p> <p>TL</p>