

From: [Jo Wilkins](#)
To: [A303 Sparkford to Ilchester](#)
Subject: A303 Sparkford to Ilchester, TR010036 - Deadline 7
Date: 30 May 2019 17:01:14
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[South Somerset District Council response to documents submitted at D6 and 6a - D7.pdf](#)
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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 7

Please find attached relevant documents from South Somerset District Council in respect of Examination Deadline 7.

The submission includes the following: -

- South Somerset District Council's responses to the Action Points arising from Issue Specific Hearings 5 and 6.
- South Somerset Economic Development Strategy, February 2019
- South Somerset District Council's response to documents submitted at Deadlines 6 and 6a.
- South Somerset District Council's position on outstanding matters relating to the Statement of Common Ground with Highways England.

Yours sincerely

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Application by Highways England (Ref – TR010036) for an Order Granting Development Consent for the A303 Sparkford to Ilchester Dualling project

South Somerset District Council Submission - Deadline 7

The following comments are submitted by South Somerset District Council in response to documents submitted at deadlines 6 and 6a.

1. **Comments on Outline Heritage Scheme of Investigation (Revision A) (REP6-003)**

The Council has made earlier representations on the draft Outline WSI regarding:

- a) Provision for investigation of the abandoned section of Hazlegrove Lane, which remains as a PRow and parish boundary (NGR 359864, 126093 to 359694, 125896), unless the findings of an earlier trial trench has met the objectives set out in section 3.1.1 relating to Hazlegrove Lane.
- b) Provision for the photographic recording of the landscape character of the southern part of the RPG including its wider setting, including drone aerial photography.
- c) Support otherwise for the measures and aims of the draft Outline WSI.

The abandoned section of Hazlegrove Lane has been added to the Outline WSI and the Applicant has identified paragraph 5.3.1 as providing the context to secure a photographic record of the historic landscape and its setting. This includes the use of drone, video and traditional photography and for the Council and Historic England to be consulted on the key views and tailored methodology.

Paragraph 3.4 also identifies the aims and objectives of the recording to include “key views from Hazlegrove House and the Registered Park and Garden (RPG) south west across the parkland over the scheme area”.

The Outline WSI is supported.

2. **Comments on Noise and Vibration Updates (Revision A) (REP6-011)**

Operational impact – long and short term.

There are 21 new developments currently planned or under construction (see table 2.1 of update report, May 2019). 7 of which have a ‘minor adverse impact’ in the short term.

Construction noise impacts on new developments

The majority of the new developments are not subject to significant adverse effects during construction. There are approximately 4 planned receptors that are potentially subject to significant adverse effects due to their proximity to the works at this development. Table 2.3 confirms that construction works mitigation is sufficient to mitigate these impacts with barrier mitigation, however the report does not seem to specify these developments. South Somerset District Council would like Highways

England to confirm what these are as this will be useful for us when we are reviewing the Section 61 applications.

Night-time operational noise levels

The night-time operational noise levels given have been over-estimated, typically by approximately 1dB. However, this does not change the assessment outcome from original information provided in the ES.

Analysis

There remain 10 receptors subject to moderate increases in the short-term and 1 receptor subject to a major increase in the short term. This was already covered in the previous report. (Section 2.5.4).

There are now 130 receptors subject to minor increases in the short-term (1.0 to 2.9 dB increase) – an increase from 107 from the previous ES. This means that 23 of the new receptors will be subject to minor increases in the short-term. There is still 1 receptor subject to a moderate impact in the long term (The Spinney). However, the previous report said that Annis Hill Farm was exposed to a moderate impact (see table 11.39 of Chapter 11 Noise and Vibration Report – APP-048).

Sparkford High Street: there are 10 receptors with increases of no more than 1.1dB. The increase is predominantly due to changes in flow in Sparkford High Street, and is towards the bottom end of the minor increase classification band. For all 10 receptors, the noise increase in the long-term is negligible and there are no major changes in acoustic character. Therefore, the noise impact for these new 10 receptors is not considered to be significant. The remaining 13 (of 23) new receptors subject to minor increases in the short-term are exposed to noise below SOAEL so are not subject to significant adverse impacts.

South Somerset District Council would like to know if Highways England have accepted that they need to provide us with more information in the form of the physical dimensions and construction of the noise bund/barriers at The Spinney and Annis Hill Farm? If so, when can we expect this information to be provided?

We would also like to know what noise level Highways England are expecting at The Spinney and Annis Hill Farm following mitigation? The Environmental Statement Chapter 11 Noise and Vibration Report dated July 2018 (APP-048, page 51) mentions in 11.12.6 that noise levels will meet the operational noise aims of the NPSE and NPPF. Can HE please clarify what noise levels they are expecting at these locations both external and internal during the daytime and night time?

3. Comments on Environmental Statement Table of Errata (Revision B) (REP6-005)

The revised assessment for the Bakery and Methodist Chapel is far more informative than that originally included in the ES and pulls out the integral significance of the road to both, albeit that the use of the Chapel has recently ceased due to the hazard of the increasingly busy road. There is no substantial change in the assessment of the magnitude of impacts and significance of effects. We previously challenged the assessments but have been pragmatic in recognising that any level of effects on these heritage assets will not alter the design of the proposed scheme, and this will remain the case.

4. Comments on Works Plans – Non-material Change Request (REP6-002)

Sheet 4 of 4, which covers the south-west corner of the RPG affected by the non-material amendment, and the amendment concur with the proposal in the non-material amendment and the lateral limits of deviation for the amended driveway alignment is accepted.

5. Comments on Highways England document Responses to the Examining Authority's Third Round of Written Questions (REP6a-002)

ExQ3.1.5:

SSDC's position on the need for a Conservation Management Plan was further set out in its Deadline 4 submission (REP4-037) on the Applicant's Deadline 3 Submission (REP3-003) under the heading of 1.7 Cultural heritage: Hazlegrove Conservation Management Plan.

The Applicant has updated its position in its Deadline 6 response to ExQ3.1.5 (REP6a-002).

SSDC has not identified any information in the Applicant's ExQ3 response to alter the Council's position.

Furthermore, the Council notes that in its response to ExQ3.1.5 the Applicant states that *"it does not accept that a CMP is required as mitigation for the DCO scheme. The impacts from the scheme on the area within the Order limits are managed through the DCO already, particularly through the inclusion of mitigation set out in Table 3.1 REAC within the OEMP (REP5-013) (further details of the proposed mitigation are included in the response to 3.0.4 above). The Applicant therefore does not agree that the CMP should be secured in the DCO"*.

The mitigation measures in Table 3.1 of the Record of environmental actions & commitments (REAC) amount to:

CH7 Objection: Preservation by record of archaeological remains

Action: measures in WSI.

CH8 Objection: Preservation by record of archaeological remains

Action: measures in WSI.

CH10 Objection: Protect the character of Hazlegrove House RPG.

Action: landscape scheme to reflect the parkland character of the RPG.

None of these objectives address the fundamental harm to the RPG, as outlined in SSDC's Deadline 4 comments, i.e.:

- Loss of 14% (10.6 ha) of the designated RPG parkland and woodland.
- Loss of historic features including driveways, earthworks, copse, historic boundary demarcation, and a veteran tree.
- Introduction of highway water management infrastructure on 4% (3.1 ha) of the RPG.
- Harm to the setting of the remaining RPG and listed Hazlegrove House through loss of parkland and the closer proximity of the trunk road.

(Please note: this is a repeat of the Council's latest observations for the Statement of Common Ground).

ExQ3.10.21:

The Applicant's response to ExQ3.10.21 does not address the question of securing the establishment of the landscaping scheme for the RPG beyond the 5-year maintenance period in the LEMP (see Commitment L5 of Table 3.1: REAC of the OEMP) and the 5-year plant replacement period in Requirement 6.

5 years is insufficient to ensure the establishment of the RPG's landscape restoration planting or the establishment of the mitigation planting measures affecting the RPG, including the screening measures based on 15-years plant growth.

A requirement for a RPG Conservation Management Plan in the DCO would help address this issue.