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To: [A303 Sparkford to Ilchester](#)
Cc: [Woodhouse, Helen](#); [Harries, Beth](#); [South West Casework](#)
Subject: TR010036 - A303 Sparkford to Ilchester Dualling Project
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Attachments: [image001.jpg](#)
[image36h2af.JPG](#)
[A303 Sparkford Ilchester DCO_HBMCE response letter_160920.pdf](#)

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

Further to the Secretary of State's request for information, the Applicant has submitted various documents and the Secretary of State welcomed comments from all Interested Parties on the Applicant's response. In our attached letter we have set out our comments on those documents, in so far as they relate to the historic environment.

Yours faithfully,

Jo McAllister

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Our ref: SPIL-SP0005 and
2001-4933

16th September 2020

Dear Sir/ Madam

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

1. INTRODUCTION

1.1. Historic England is the government's statutory adviser on all matters relating to the historic environment, including world heritage. It is our duty under the provisions of the National Heritage Act 1983 (as amended) to secure the preservation and enhancement of the historic environment.

1.2. The Historic Buildings and Monuments Commission for England is generally known as Historic England. Historic England's creation and role in relation to the historic environment is detailed in Section 2 of our written representations, dated 23 January 2019.

1.3. We understand from the Secretary of State's letter of 21 July 2020 that he is minded to refuse consent for the A303 Sparkford to Ilchester Dualling scheme. We note that subsequently the Applicant has provided further information to demonstrate how they consider the issues identified in the minded to refuse letter are to be addressed.

1.4. We note that the Secretary of State would welcome any comments from all Interested Parties on the Applicant's response.

1.5. In responding to this consultation Historic England, in line with our advice to the Examining Authority throughout the Examination, has sought to focus on advising on those matters that will assist and inform understanding of the



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implications for the historic environment arising from the Scheme and the Applicant's response.

- 1.6. To that end we have focused exclusively on the heritage related matters raised in the Applicant's response in line with our remit and will not be commenting in relation to the other matters raised.

2. HISTORIC ENGLAND'S COMMENTS IN VIEW OF THE SECRETARY OF STATE'S REQUEST FOR COMMENTS DATED 19 AUGUST 2020

2.1. In response to the Secretary of State's request the Applicant has submitted the following documentation with relevance to the historic environment:

- **TR010036-001602-9.44: Submission in response to the Secretary of State's letter dated 21 July 2020**
- **TR010036-001603-9.45: Submission in response to selected points arising from the revised DCO (Rev A, August 2020)**
- **TR010036-001601-6.7: Outline Environmental Management Plan, Rev C**
- **TR010036-001605-rDCO with Applicant amendments - Rev 0.7**

2.2. Three main issues for the historic environment arise from:

- The potential introduction of plastic flags around Pond 5, re. the Bird Hazard Management Plan;
- The potential introduction of new lighting columns either side of Hazlegrove Underbridge, and on the adjacent de-trunked section of road;
- The potential widening of the maintenance track to Pond 5.

2.3. We have set out our comments below in relation to these issues, cross-referenced to the relevant documents submitted.

The potential introduction of plastic flags around Pond 5:

2.4. The Applicant has prepared a Bird Hazard Management Plan (BHMP) to address the Defence Infrastructure Organisation's (DIO's) concerns regarding



the risk of bird strike being increased by new balancing ponds in the vicinity of RNAS Yeovilton. The Secretary of State is seeking further information from the Applicant on the scope of the plan, the extent to which it will address the DIO's concerns, and confirmation that any changes proposed to the design of the ponds as part of the BHMP would be consistent with the Environmental Statement (ES) and drainage strategy.

- 2.5. One of the proposals within the BHMP is to use lines of plastic flags to deter birds from landing on the grass areas adjacent to the ponds (re. section B. 7, p.62, of the Outline Environmental Management Plan). We have been unable to clarify from the Applicant's information which ponds the BHMP applies to and if Pond 5, which is located within Hazlegrove House registered park and garden (RPG) 4 km east of RNAS Yeovilton, is included.
- 2.6. If the plan does apply to Pond 5, then the impact of the use of lines of plastic flags on the pond banks would need to be assessed. No such assessment appears to have been undertaken. .
- 2.7. We would have concerns about the insertion of a line of plastic flags because of the negative visual impact on the significance of the RPG, due to the location of Pond 5 as part of the arrival into the site.

The potential introduction of new lighting columns either side of Hazlegrove Underbridge and on the de-trunked section of road:

- 2.8. The Secretary of State has requested information from the Applicant as to whether lighting of Hazlegrove Underbridge at night can be delivered. The Applicant advises that it could be delivered but it would have to include lighting of the carriageway and entrances at either end. This would comprise an estimated 24no. 10 metre-high lighting columns. They advise that this would increase the modern road network character in key views from the park and Hazlegrove House. After undertaking a high-level environmental



assessment, they consider that this would have an additional adverse effect on the landscape character of Hazlegrove House RPG, and the visual amenity from Hazlegrove House, thus increase the significant cultural heritage impacts on the two designated assets.

2.9. The Secretary of State has also been critical of the lack of lighting on the de-trunked section of the A303 at Hazlegrove (re. the Examining Authority's Recommendation Report, section 11.6). The Applicant advises that the introduction of additional lighting along the de-trunked section would bring a further 19 light columns into the view from viewpoints (38 & 39) within the RPG. As such, they consider that the significant permanent construction and operational effects reported for Hazlegrove House and the RPG in the ES would remain and be increased by the additional lighting required.

2.10. In our Written Representation (Historic England - Deadline 2 Submission - Written Representation & suggested locations for site inspection, p.29) we considered that whilst the proposed false cuttings and woodland planting would screen much of the road from the RPG, they would not be sufficient to screen large vans, coaches and HGVs. Therefore, this would also apply to high level lighting (10m high columns) extending west from Hazlegrove Junction into key views from the House. We would concur that there may be an increase in the level of harm to the designated assets arising from this additional lighting. As a result, additional mitigation measures may need to be evaluated and implemented.

The potential widening of the maintenance track to Pond 5:

2.11. The Examining Authority considers that the widening of maintenance tracks to the new balancing ponds from 4 to 6 metres, would improve the resilience of the road and its drainage features long term. In response, the Applicant has advised it does not consider it necessary to include such a provision. In their assessment, they have focused on the biodiversity impacts rather than the

landscape or cultural heritage impacts of the proposal. They advise that the increase in track width would be to the detriment of the additional biodiversity that is being provided by the scheme.

2.12. In our Written Representation (Historic England - Deadline 2 Submission - Written Representation & suggested locations for site inspection, p.26) we considered that the location of the drainage feature, comprising Pond 5, the maintenance track and fencing, would have an impact on the character and setting of the RPG.

2.13. We consequently held discussions with the Applicant and South Somerset District Council in March 2019 on changes to the layout of the pond and track in order for it to respond more sensitively to the setting and improve the sense of arrival into the RPG. The track was moved from the east side of the pond to the west in order to reduce its visual impact. The revised scheme was submitted as a non-material amendment. Refer also to TR010036 8.3 Statement of Common Ground with Historic England (sub section Hazlegrove Junction, p.15).

2.14. Based on a review of the current layout (TR010036 2.6 General Arrangement Plans 2.6, Sheet 6 of 7, Rev C02), we consider that the widening of the track may necessitate the pond moving further east into the open parkland, thus increasing the visual dominance of the drainage feature at the entrance into the RPG.

2.15. As access to the pond and track is off the entrance drive into the RPG, as noted above, previous discussions had resulted in a revised scheme to ensure that the changes to the pond and track were able to respond more sensitively to the setting and improve the sense of arrival into the RPG. It is therefore unclear from the information provided the extent to which this

widening will also need to apply to the drive itself and how this impact would be mitigated in view of the sensitive location.

3. CONCLUDING COMMENTS:

- 3.1. 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. Historic England'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. These issues were matters which we considered were 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 decision maker.
- 3.2. Further to the Secretary of State's request for information, the Applicant has submitted various documents and the Secretary of State welcomed comments from all Interested Parties on the Applicant's response. We have set out our comments on those documents (listed in paragraph 2.1 above) in so far as they relate to the historic environment.
- 3.3. Should the Secretary of State have any additional queries, either in relation to our comments above or the responses from other Interested Parties to the Secretary of State's letter, we would be pleased to respond as appropriate.

Yours sincerely

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