

CASE : Application by Highways England for an Order granting  
Development Consent for the proposed Junction 10a M20 Motorway

Response to The Examining Authority's first written questions  
and requests for information issued on 9th December 2016

on behalf of

The Executors of Marianne Clunies-Ross (deceased) and others

by

D H Lowe F.R.I.C.S. as Agent for the above

This further submission is made in response to the Examining Officer's request for an update contained in Paragraph 21.19 of the above "First Written Questions and Request for Information" issued on 9th December 2016.

The request that provision should be made for a fourth arm off the proposed "Stour Park Roundabout" was duly submitted to Highways England but they have explained that they are unable to adopt the proposal as the roundabout in question was not a feature of their primary scheme but an alternative promoted and to be funded by the private Developers of the proposed Stour Park Development.

The said Developers were therefore approached, through their Local Agents, on 13th December 2016, requesting that they open discussions with a view to exploring the idea of a fourth arm being incorporated in their alternative scheme.

As at the date of this submission no response has been received from the Developers or their Agents.

I would hasten to add that we are not seeking a major alteration merely a token 'stub end' which should not be difficult to incorporate bearing in mind that a "works exit" is already shown as leading off the North Side of the said roundabout.

In view of this matter being unresolved I wish, on behalf of my clients to reserve their right to object to the alternative proposals involving the Stour Park Roundabout while continuing to support the main Highways England Scheme.

My clients also wish to reserve the right to object to any Compulsory Purchase Order on the grounds that some of their land to be compulsorily acquired will be used to enable the "Stour Park Roundabout" to be constructed to serve the objectives of a Private Developer who does not possess Compulsory Powers.

Having made the above points I wish to emphasise that with the application of reason and common sense from all parties involved I feel sure that my clients objections can be easily resolved.

As regards question 21.19 (ii) I would suggest that a Direction is incorporated in the Development Consent Order stipulating that if the "Stour Park Roundabout" is incorporated as part of the adopted scheme then provision should be incorporated for a fourth arm off the Northern frontage in order to avoid the block of land sandwiched between the Southern Link Road and the M20 Motorway being landlocked.

David Lowe

For and on behalf of The Executors of Marianne Clunies-Ross and others

12th January 2017