

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

Further representations following on from my initial response dated 12th January 2017 to The Examining Authority's first written questions

on behalf of

The Executors of Marianne Clunies-Ross (dec'd) and others

by

D H Lowe

Since submitting my initial response to the written questions I have received a reply from the Developers of Stour Park.

In response to my clients request for discussions prior to the Hearing they advise that "...until the NSIP process has run its course and they have certainty neither they or the Fund are going to be sidetracked."

In view of the above I feel it necessary to lodge the following objections on behalf of my clients :

1. A formal objection against the inclusion of the Stour Park roundabout
2. If the Stour Park roundabout is to be incorporated in the scheme then my clients wish to lodge a formal objection against the Compulsory Purchase Order.

The grounds of objection 1 are that without provision for a fourth arm off the Stour Park Roundabout the scheme fails to make adequate advance provision for all potential access requirements necessary to maximise the use of the adjoining area and avoid a significant block of land being virtually landlocked.

As regards objection 2, some of my client's land being compulsorily acquired will clearly be required to facilitate the construction of the Stour Park roundabout which is an amendment to Highways England's core scheme promoted by a private Developer who does not possess compulsory powers.

I hasten to add that these objections can easily be resolved by the inclusion of a short stub of a fourth arm off the northern side of the roundabout.

I submit as a precedent the case of the "Morrisons" (formerly Safeways) roundabout on Colharbour Road, Gravesend, Kent.

In that case when the existing Morrisons Store was built in the mid 1990's the stub of a fourth arm was incorporated in a new roundabout being built as part of the scheme to provide a potential access point for land on the North side of Coldharbour Road before the development potential of that land had been established.

D H Lowe

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