

## **Planning Act 2008 – Infrastructure Planning (Examination Procedure) Rules 2010**

Written summaries of oral submissions put at Compulsory Acquisition Hearing  
on 9 and 10 July 2019

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On behalf of Travelodge Hotels Limited

## Travelodge Hotels – CPO Hearing

Whether there is a compelling case in the public interest to justify the compulsory acquisition of land and rights;

- The acquiring authority have taken no steps at all to engage with the landowner and their advisors to take reasonable steps to acquire the land and rights by agreement. No heads of terms have been produced or provided to date. Given we have been

in regular contact for over 3 years with the acquiring authority  
this is a failure on their part;

- Compulsory Purchase should be the last resort. For this scheme it is the only resort;

The inadequacy of the Promoting Authority to engage in any form of meaningful negotiations and whether they have met their obligations in accordance with Government Circular 06/04;

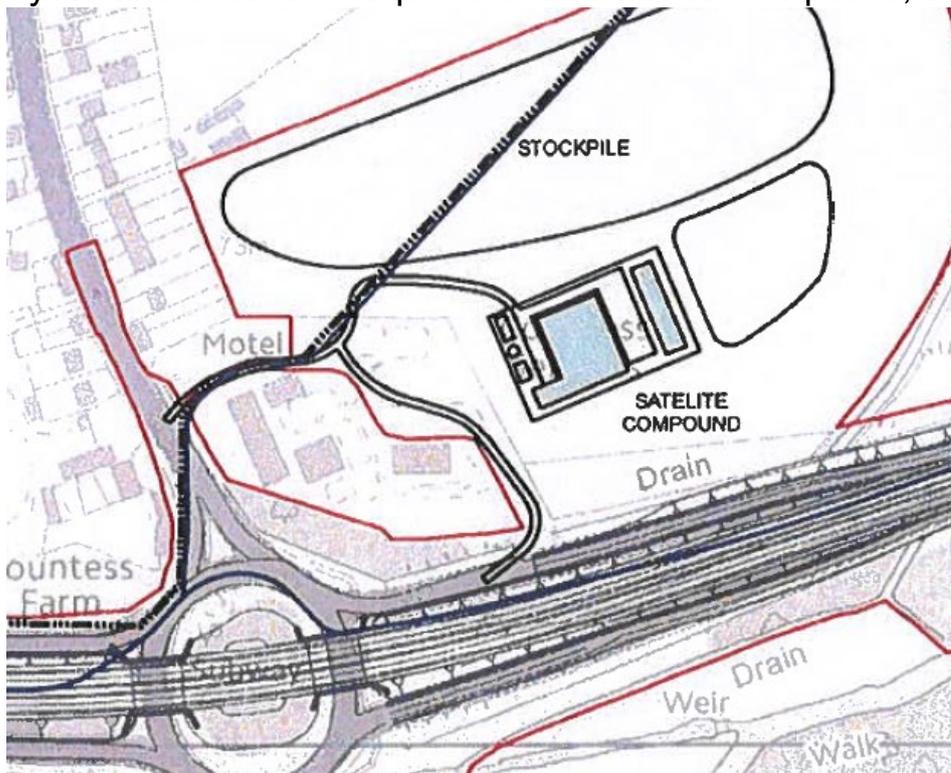
- Para 1.4.3 of the SoR states the applicant has attempted to acquire all interests in the land by agreement – can they confirm what those steps were?

- The table at 9.2 of the SoR sets out the current status of negotiations with each landowner. Page 9-95 is the page for Travelodge. Under the column “Status of Negotiations with land interest” it states:
  - “Negotiations have begun” – they haven’t
  - “Looking to have an agreement in place during examination” – no such agreement has been released by the acquiring authority.

## Impact on the Business

- The existing A303 will need to be closed during the construction of the new flyover over the Countess Roundabout. It is not clear how long this section of the A303 will be closed for, what the diversion plans, whether access will be retained for local businesses are and how frequently closures will occur. The site is open 365 days a

year and access is required at all times for the public, staff



members and deliveries to all tenants on the site.

- The existing entrance and exit roads are planned as a haul road for the satellite compound for the Countess Roundabout works – see Figure 2.7D Illustrative Construction Layout Including Compounds and Haul Roads. No details have been provided of how this interface between the users of the service station (staff, visitors, deliveries etc) and road construction vehicles will be segregated, if at all.
- Travelodge are concerned about how the interaction between construction vehicles (HGV's etc) and its customers all of whom will share the same access point during the construction of the scheme. There is no consideration of public safety and management of what will be a pinch point with traffic backing up onto the Countess Roundabout.
- There are concerns that inadequate details have been provided to Travelodge such as hoarding, if accesses may need to be temporarily diverted/re-routed at any stage in order for the business to make preparations to notify existing businesses and users of the service station.

- A significant proportion of the site is identified as being required for the “permanent acquisition of rights”. No details have been provided by the Promoting Authority on what those rights are and how they might affect the site. We understand the intention is to breach the existing fenceline to import and export materials into the satellite compound including a major stockpile.
- How will the Promoting Authority ensure the position of this compound and stockpile not materially impact the enjoyment and use of Travelodge’s site including its hotel?
- The Draft DCO identifies that new rights are required for the installation, use, protection and maintenance of, and access to, statutory undertaker’s apparatus. We understand there is a proposed water pipe and electricity cable to be diverted through Travelodge’s land. Again no details have been provided as to how and when this will occur and the business can, once more, not prepare and plan for these works. The apparatus will affect a large area of parking used for overnight guests staying at the hotel. In addition it is an area used as dedicated HGV parking to avoid congestion elsewhere on the site. Will this area be out of action during the works? If so how does the Promoting Authority intend to

replace it? The loss of this car parking area without replacement will be detrimental to the use and enjoyment of the site.

- No discussions have taken place with Travelodge to help inform the most appropriate location of any underground apparatus having regard to how Travelodge and their tenant's use the site. The applicant should be aware of the presence of underground fuel tanks on the site and should also demonstrate how they are considering the potential impact the installation of underground utilities will have on trade together with concerns regarding access for public, staff members and deliveries which need to be maintained at all times.
- It is not clear from the submission documents as to how the site will be accessed from the new road. Clearly the existing access directly from the A303 will be lost as it will be on an elevated section which concerns Travelodge as this will have a detrimental impact on passing trade and numbers of customers using the site. Under the new arrangements it is likely many motorists will bypass the site without realising whereas the current arrangements take motorists directly pass the site via a slip off the A303 having already slowed down at the Countess Roundabout and traffic lights
- There is a concern that noise, dust and other physical effects generated from the proposed satellite compound will materially impact the enjoyment of Travelodge and its tenants. There are no proposals shown in the Environmental Statement or other documents forming part of the applicant's submission showing other airborne noise, dust and fumes will be mitigated during the construction period.
- As summarised in table 9.25, 'Summary of significant effects – construction', the noise assessment identifies temporary significant noise effects at receptors close to Countess Roundabout, as a result of the construction of the Countess bridge. What measures are the Promoting Authority taking to mitigate this noise impact?

- The comments above also apply to the proposed construction of the Countess Roundabout Flyover where there is likely to be significant noise generating activities. Again there are no proposals shown in the Environmental Statement or other documents forming part of the applicant's submission showing other airborne noise, dust and fumes will be mitigated during the construction period.
- Also the new A303 will be on an elevated section in this location on a free flowing section. The current arrangement is an at grade road which is controlled by the Countess Roundabout and traffic lights. There is a serious concern regarding operational noise from vehicles using the new elevated carriageway which will be on the same level as hotel bedroom windows. There are no proposals for noise barriers or other mitigating measures which may help to counter the increase in operational noise.

## Consultation Issues

- It is understood the Applicant is not intending to prepare and submit a Statement of Common Ground with Travelodge. We are

aware the applicant has prepared a draft Position Statement but this is not being submitted as part of the examination

- We are not aware of surveys or studies have taken place on the site and therefore it is difficult to conceive how the applicant has had any regard to the impact the proposed scheme will have on the enjoyment and use of Travelodge's site.