

From: [REDACTED]
To: [A30 Chiverton to Carland Cross](#)
Subject: A30 Chiverton to Carland Cross scheme
Date: 19 February 2019 13:48:08
Attachments: [Written Representations A30 Chiverton to Carland Cross from The Harvey Family.docx](#)

Written Representation from The Harvey Family
Our Ref No: 30CC-AFP043
Your Ref: TR010026

Please find our Written representations in the attached file with an executive summary below.

With kind regards

The Harvey Family

Executive Summary:

- We accept that part of our land is needed for the realignment of the C0075 but dispute the need to take land for a row of trees which will be of little or no landscape value. We vigorously oppose the Applicant acquiring the stream in our wildflower meadow. This is not needed for the Scheme.
- Confirmation is sought that stone hedges will be built to either side of the C0075 where it bisects our land.
- Confirmation is sought that an access into our wild flower meadow will be provided.
- The C0075 is a Quiet Lane and needs to be safe for all including horse riders, cyclists and walkers who rely on slow vehicle speeds for their safety. In striving to make the lane safer, the Applicant will unfortunately make it more dangerous. There are also conflicting statements from the Applicant to be clarified.
- There is to be a works compound to the south of Pennycomequick with access from the existing A30 via the C0075. There is a blind corner and any increase in the volume of vehicle movements could cause accidents. Contractor's vehicles will also be queued back onto the existing the A30. The new section of realigned lane must be built and brought into use before the compound.
- Nowhere in the library of plans and papers can we find a design for the underpass at Pennycomequick. This is a sensitive site which intrudes into some beautiful Cornish countryside. We implore the Applicant to design a beautiful structure.
- Confirmation by the Applicant of the extent of mitigation works at Pennycomequick for the construction period is still awaited
- A fresh land plan needs to be produced by the Applicant showing the extent of the land to be returned to us.
- As a result of the Scheme, previously quiet areas in the garden will now be blighted by traffic noise. There will be no escape, from noise or from pollution. Government policy is to mitigate and minimise adverse impacts on health and quality of life and where possible to contribute to their improvement. Please mitigate, minimise and improve the effects of the Scheme on our health and quality of life.

Written Representation on the A30 Chiverton to Carland Cross Scheme by Highways England

Prepared by The Harvey Family Ref 30CC-AFP043

Introduction: We support the construction of the new A30 Chiverton to Carland Cross dual carriageway and view it as a much overdue and very necessary improvement. We deplore however the inadequate consideration of those living close to the new route, the “ human receptors”, as we are known. Bats and badgers seem to get all they need and more besides, ancient monuments and historic gardens are carefully avoided, so are wind farms and solar arrays which are expensive to compensate and have government support. Working one’s way down through farms and businesses to the bottom of this pile are we human beings who live beside the corridor, who have little to gain and in many respects the most to lose from this scheme. For ourselves we only ask that Highways England (HE) take as little of our land as possible and that they undertake whatever mitigation works are necessary to reduce the adverse impacts on our health and quality of life of the construction works and the subsequent use of the new highway, both the visual and the noise effects. For everyone’s benefit, we ask that you show consideration to users and the wider community by ensuring that as far as possible the area retains its rural character and the wider verges and enhanced visibility do not result in increased speeds endangering cyclists and horse riders.. This means replicating the road widths of the existing C0075 in its re-aligned form and building an underpass that is visually appealing and respects the surrounding environment.

We now itemise the particular anxieties that we have.

- 1. Amount of land being taken:** There are two pieces of our wildflower meadow (OS4600) that Highways England wish to acquire. The first is a strip at the western end adjacent to the existing C0075. This land will be used to re-align the lane, create a new highway verge and to plant a small stand of trees. We accept the argument for re-alignment but have very real concerns that the width and design will evermore change the character of this little country lane and make it considerably more dangerous both for other drivers and particularly for other users including cyclists (which are numerous) walkers (several including ourselves) and horse riders. We enlarge on this problem in section 4 but comment here that a common-sense approach to straightening a seldom-used thoroughfare is required.

When we first queried the need for a narrow strip of woodland we were told that it was in mitigation of the effects of the scheme on wildlife. Subsequently HE suggested that it will form part of a landscaping scheme, presumably to reduce the visual impact of the new road. Dealing first with the wildlife mitigation claim, we have maintained our wildflower meadow as a nature reserve for 37 years. During this time it has not seen a plough or weed killer. The seed heads are not cut down until the birds have had their fill. Ask yourself who will be the better curator of this strip of land; the present owners who have already proved their credentials, or a cash-strapped local authority that will have to assume responsibility for maintenance. Bear in mind also that when travelling eastbound along the old A30, the proposed new trees and the new A30 are obscured by our 30-year old stand of *Larix Kaempferi* trees and other plantings in our garden. When travelling westbound, no planting beside the C0075 would act as a visual barrier. The proposed planting on the sides of the elevated section of new A30 is of much greater importance and will provide a visual barrier in due course.

In summary, we intensify our objections to your compulsory acquisition of land for an unnecessary and all-but-invisible strip of woodland that will not survive the east winds, rabbits and flail mowers.

The second tranche of land that Highways England wishes to acquire is the stream at the eastern end of our wildflower meadow identified as land parcel 8/2c on sheet 8 of the Land Plans and in the Book of Reference. Its proposed acquisition has not been mentioned at any of our meetings with HE and we 'happened' to notice their intentions only recently. The stream has recently (Summer 2018) been upgraded and re-aligned by HE (under their Project No HE546539) and with our consent to improve surface water drainage from the existing A30. The works were described as adequate to cope with run-off into the foreseeable future, well after the road has been downgraded to a Class B road.

HE claims that acquisition of the stream is necessary for the construction and operation of the new attenuation pond in the adjoining field. We have doubts as to the legitimacy of this claim. Between the stream and the field that will contain the attenuation pond, there is a tall and substantial stone hedge. At its nearest point, the pond will be approximately 56m from the hedge and stream. The access road for the pond is planned to follow the perimeter of the field. We can think of no possible reason for acquiring the stream for construction reasons. With regards to operational need, according to sheet 15 of the Environmental Masterplan, the attenuation pond will discharge some 75m downstream of our boundary. It could not discharge into the stream on our land unless it was pumped uphill. No connection between the attenuation pond and our property is shown on any plan. There is no mention of any such works on Sheet 6 of the Works Plans. Whilst it is clear that the attenuation pond is to be constructed to serve the new A30, it is equally clear that the stream crossing our land serves only the existing A30 as it has done since time immemorial and will continue to do in the future. The proposed acquisition of this part of our land has nothing to do with the new A30 road scheme; it should not be acquired and it should not appear within the Development Consent Boundary.

- 2. Boundary structures:** The colouring on Sheet 15 of The Environmental Masterplans is unclear. We seek confirmation that there will new stone hedging to the full length of both sides of the C0075 where it bisects our land. We query whether there is an anomaly on Sheet 6 of the plan showing Trees and Hedgerows to be Removed or Managed, since this shows the northern end of the hedgerow to the east of the C0075 at its junction with the A30 as remaining intact, but it is apparent from sheet 15 of the Environmental Masterplan that this section of Cornish Hedge will have to be demolished for the junction works.

As will have already been seen in para 1c above, we strenuously oppose the acquisition of a strip of land by HE for landscaping purposes. If, however, the inspector decides that this should be permitted, there should be some form of boundary structure between our meadow and the landscaping strip. The only permanent structure which will not involve us in future maintenance costs is a Cornish hedge, which will also provide some shelter initially for the young trees from the cold East wind.

- 3. Access to meadow:** Access to our wildflower meadow is via a farm gate from the C0075 close to its junction with the A30. No access into the meadow is shown on the HE plans. If we are correct and the gate will have to be reinstated as part of the works, we suggest it is placed away from the existing A30 junction, say in the south-west corner of the wildflower meadow, for safety reasons.

- 4. Design width of C0075:** The C0075 is designated as a Quiet Lane and needs to be safe for vehicles and other users, ie horse riders, cyclists and walkers, all of which rely on slow vehicle speeds for their personal safety. The re-aligned lane must be of a width to discourage higher vehicle speeds. The plans show a 3.5m road which is similar to the existing and adequate, given the few vehicles that use it. HE writes in 5.1 Consultation Report - page 103 “ *An agreement has been made with Cornwall Council to match the widths of realigned side roads to their existing widths ...*” However they go on to say at the bottom of the same page “*The carriageway of the new section of lane is designed to be wider than [sic] the existing lane to accommodate agricultural and other vehicles passing.*” Both of these statements cannot be correct; one is right and the other wrong. HE must clarify the proposed width. As regular users of the lane, we are unaware of any problems in users reversing vehicles (if this proves occasionally necessary) to one of the passing places that have evolved over the years.

At present there are high banks to either side of the lane which serve to emphasize that this is a narrow country lane. The proposals show that there will be wide verges, in places as wide or wider than the lane itself, which will give the impression of a road that can safely be driven at speed. HE needs to learn from the experiences of Local Authorities across the country in controlling speeds on Quiet Lanes through subtle road design. HE’s attitude to date is “*No change to the speed limit in this area is proposed, so there is no danger posed by increased speeds*”. This is an unbelievable and dangerously simplistic view. The speed limit on the C0075 is proposed to be the National Speed Limit for single carriageway roads, ie 60mph – totally inappropriate for a road of this type. By straightening the road and improving visibility, you encourage drivers to increase their speeds. The problem then arises, not on the improved length of lane but just below Honeycombe Farm where the lane narrows and forward visibility is greatly reduced with high banks and vegetation on either side. We envisage not a bottleneck, as HE previously and erroneously inferred that we suggested, but road traffic accidents potentially involving walkers, cyclists or horses and riders. In striving to make the lane safer, you will unfortunately make it more dangerous. The solution is to slow traffic where the lane has been re-aligned, either by better design or by a speed limit. The solutions and advice from authorities in other parts of the country faced with having to slow traffic in Quiet Lanes has been:

- a) A narrow lane entrance deters through traffic
- b) Lanes with grass along the centre of the carriageway produce the lowest driving speeds;
- c) Existing natural traffic calming features of the lanes, such as narrowness, bends and high banks, trees in verges and ditches are strengths to build on
- d) Standard engineering solutions at junctions, including wide visibility splays, can increase traffic speeds and cause difficulties for pedestrians forced to cross the wide junction mouth. Wide junctions could encourage inappropriate vehicles to use the routes or give drivers false expectations of the standard of road to be encountered and, in turn, this affects driver behaviour. The loss of hedges and mature trees and their replacement with large areas of mown grass is often uncharacteristic of rural landscapes.

We are unaware of any accidents in this section of lane during the last 37 years, despite a blind corner, mainly due to the natural traffic calming features mentioned above.

5. **Works Compound:** There is to be a works compound 200m or so to the south of Pennycomequick with access, we are told, to be from the existing A30 via the C0075. We are also told that, it is mainly to be used for storage and construction of the Pennycomequick underpass. We anticipate a large number of delivery and contractors' vehicles going backwards and forwards daily at certain times during construction. We do not oppose the location of the compound and accept the need for it, but we find HE's attitude to preventing conflict with existing road users somewhat unusual. It is no use saying that the main contractor will sort this out; HE must take a lead. There is a blind corner at the bottom of our drive and an increase in the volume of vehicle movements will lead to accidents. Quite apart from this danger, another will be created with contractor's vehicles and lorries queued back and onto the existing the A30 nearby. The solution is simple; the new section of realigned lane must be built for use by the contractors and suppliers before the compound is brought into use. HE must make that decision now and instruct the main contractor accordingly. They refer us to document 6.2 The Construction Environmental Management Plan but for the moment this document contains no relevant information.

6. **Bridge design:** Nowhere in the library of plans and papers can we find a design for the underpass at Pennycomequick. This omission, combined with previous exchanges on the matter with HE, is a source of great concern to us. It is clear that an 8.7-mile length of Cornish countryside is being despoiled by the construction of a great big new dual carriageway road built to the latest standards. The necessity to build a new road is not in question, but the need to make it blend into the countryside as much as possible is at times overlooked. An impressive video has been prepared which shows the A30 element of the scheme, from the air and as if in a car, but very little of the realistic impact on the surroundings can be seen other than acres of tarmac. There are so few cars shown travelling on this new road that one wonders why we are losing so many hectares of good farming land for a non-existent problem. The reality is of course very different,



The Underpass at Pennycomequick as depicted on the video

and the video has been prepared in order to "sell the scheme".

If the underpass at Pennycomequick was to be built as shown on the video, HE should win design prizes. However, unlike as depicted, there will be railings and

crash barriers beside the bridge, a thick concrete platform supporting the road carriageways and concrete piers to either end. We think that some good, accurate, artists impressions of the bridges etc would be of far greater value than a romantic and ever-so-slightly inaccurate video. Bear in mind that those driving along the road will probably be less interested in the road's appearance "looking in" than those living near it.

During the gestation of this project, HE has often quoted the Design Manual of Roads and Bridges (DMRB) to us and their perceived need to slavishly follow its contents. Section BA 41/98 deals with “The design and appearance of Bridges” and para 2.13 draws attention to the “*Economics of Good Design*”. We quote this section of the manual back to them:

“A commonly held but erroneous view is that a bridge which is attractive in appearance must be more expensive than one which is not. This is not necessarily so. In fact a good-looking bridge is likely to have had more thought devoted to all aspects of its design; it will probably be a more fully integrated design and therefore could even cost less to build. It may well have cost more to design, but this is a small part of the total cost and should be taken into account when the situation requires a sensitive design. There are sometimes situations where to do justice to a bridge and its site it is necessary to spend some extra money, and this is an important part of the environmental mitigation of schemes. Unless designer and client are willing to make and accept a case for the necessary spending, where it is really justified, it is unlikely that they will have attractive bridges in those cases where it is not, because the first essential to getting an attractive bridge is the feeling, on the part of the client and the designer, that it really matters”.

We assume that the client in this case is Her Majesty’s Government and our MP tells us that money is not an issue, but a well-designed scheme is. This is a sensitive site which intrudes into some beautiful Cornish countryside, so please do the right thing, design a beautiful structure and mitigate the impact of this proposal; make the case for the slight increase in cost.

We have raised the design of the underpass at Pennycomequick with HE on more than one occasion. Their sole response to date has been that the bridge has been designed to DMRB standards and that expenditure on aesthetic improvements is not warranted. This attitude is not encouraging and since no plans or drawings seem to have accompanied the application, they are presumably not part of the inspector’s remit and we are to be solely in the hands of HE on the matter. This does not seem a right and proper approach.

- 7. Mitigation during construction works:** When registering with the Planning Inspectorate on 8th November, we wrote that we hoped that agreement had been reached on the matter of mitigation during construction works and that full information would be provided to us before the end of November, as promised,, by HE. Regrettably HE did not make contact in November as they had promised, nor in December, nor in January nor during the first two weeks of February. We would be grateful if they would write to us again confirming exactly what it is that they propose.
- 8. Land to be Returned:** HE seems to have misunderstood an email sent to them by me on 12th September 2018. At a meeting on 15th August they proposed to return to our ownership the wildflower verges beside the C0075 and the new woodland strip, following completion of construction. There would be a covenant to maintain etc. I wrote back to them saying “*We have taken advice over the verge and woodland that you are proposing along the western side of our small meadow. As a result we have decided that we do not want this land returned to us; please could you amend your plans accordingly and accept our apologies for any inconvenience this may have caused you.*” This has been misinterpreted to mean that we do not want returned to us any of the land not required after the scheme is built. I would be grateful if this error could be corrected and a fresh plan produced showing the extent of the land to be returned to us.

9. Traffic Noise: We enjoy our garden to the extent that we spend more daylight hours outdoors than we do indoors. We live in close proximity to the existing A30 which every year has grown busier. Several years ago there was another scheme to improve the road, but this fell by the wayside; following this demise we developed a new section of garden where we could escape most of the traffic noise, particularly if the wind was in the south. This is now maturing, but rather than being able to sit and relax there, it is to be blighted by traffic noise now as well. To the rear of Pennycomequick the road is intended to be in a one-metre cutting giving us some respite, however just a few metres away near the top of the hill, it emerges to a level just above the existing ground level and progresses onto the underpass where there will be absolutely nothing to reduce the roar of the traffic. If permitted tolerances are stretched to the maximum and the road level is 0.5m higher, the situation becomes noticeably worse. Highways England, has hired noise and vibration experts to make assumptions as to traffic noise on the old and new roads, incorporating the number of times the wind blows from each direction, how often it rains, and best of all, how many vehicles will use the roads without the need to undertake a single traffic count. Clever stuff, in fact so clever that it defies credibility. We have asked on several occasions to be put in touch with their experts but with no joy. We have asked for their data to be released to us but without success. It further turns out that their traffic noise modelling does not take into account that vehicles on the existing A30 are currently stationary for several hours each day in the summer (less in the winter) and producing very little noise; this calls into question the validity of their comparative computations of future noise levels and consequent benefits.

But it is more than the amount of noise which will be so disturbing and irritating; it is the fact that on completion of the scheme we shall be surrounded by roads on three sides. HE will not have just moved a road but built an additional enormous road behind us. There will be no escape for us, either from traffic noise or from the pollution generated all around us. Meanwhile the gentlemen from HE tell us that we shall be so much better off when the road has been built. They seem unable or unwilling to look at the bigger picture and instead see only what their computer models tell them. Stone hedges beside the new road, particularly where the new road crosses over the underpass, would make such a large difference to our lives. We read in Chapter 11 Noise & Vibration that Government stated policy is not only to mitigate and minimise adverse impacts on health and quality of life but where possible to contribute to their improvement. HE's present plan of inaction is contrary to this policy and the reasons for this disregard seems to be purely a desire to save money.