

A30 Chiverton to Carland Cross TR010026

8.6 COMMENTS ON WRITTEN REPRESENTATIONS

Volume 8

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Table of Contents

	Pages
1 Introduction	1
1.1 Purpose of this document	1
1.2 Structure of the document	1
2 Response to Written Representations	2
Appendix A: Highways England Response to Historic England Written Representation	53
Appendix B: Highways England Response to St. Allen Parish Council Written Representation	94
Appendix C: Mr and Mrs Harvey Land Plan	103

Table of Tables

Table 1 Highways England response to Written Representations	2
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1 Introduction

1.1 Purpose of this document

- 1.1.1 This document has been prepared by Highways England (the Applicant) for submission to the Examining Authority (ExA) at Deadline 2 of the Examination of the A30 Chiverton to Carland Cross application.
- 1.1.2 The document provides the Highways England response to Written Representations from Interested Parties which were submitted to the ExA at Deadline 1.

1.2 Structure of the document

- 1.2.1 In total, 18 Written Representations were submitted to the ExA at Deadline 1 on 19 February 2019. Highways England has provided comments on these Written Representations.
- 1.2.2 Table 1 provides:
- the Planning Inspectorate reference number for each Written Representation received;
 - the name of the individual, party or organisation which made the representation (the Interested Party);
 - the representation itself; and
 - Highways England's response or comment on the content of the Written Representation.
- 1.2.3 In some instances, Highways England has provided a response to a Written Representation directly to the Interested Party prior to Deadline 2. Where this is the case, a copy of this correspondence is provided in an Appendix to this document.

2 Response to Written Representations

Table 1 Highways England response to Written Representations

Reference	Interested Party	Written Representation	Highways England Response
REP1-014	Historic England	See Appendix A of this document.	All matters are covered in the Highways England response to this Written Representation, which was sent to Historic England on 19 March 2019 and is provided in Appendix A of this document.
REP1-012	Health and Safety Executive (HSE)	<p>HSE notes the following request for a Statement of Common Ground (SoCG) with the Applicant for the A30 Chiverton to Carland Project by 19th February 2019:</p> <p>SoCG with the Health and Safety Executive (HSE) to include:</p> <ul style="list-style-type: none"> • Details of the Major Accident Hazard Pipeline • Current case specific LUP advice • Need for HSE review of Redcliffe International at Newlyn Downs <p>HSE Position Statement</p> <p>HSE does not propose to submit a SoCG, as we are satisfied that our concerns regarding the Major Accident Hazard Pipeline and Newlyn Downs explosives site have been addressed.</p> <p>HSE liaised with Ross Cullen (Arup), ahead of the Preliminary Meeting and Issue Specific Hearing for this Project.</p> <p>Our risk assessors have looked at three Draft route plan drawings provided by Ross Cullen (31/1/19) showing the two separate proposed gas main diversions; noting that this is the design developed</p>	Highways England has no comments on this representation. It is noted that matters have been resolved and the Health and Safety Executive does not advise against the scheme.

Reference	Interested Party	Written Representation	Highways England Response
		<p>by W&WU for their contractor tender, with the final design to be confirmed by their contractor. We understand that this will be confirmed over the next couple of months ready for start on site in April 2019 and will include ongoing engagement with HSE. Our assessors have also referred to our Consultation Zone mapper and a route plan from 09/01/2019 on the authority's website provided by Highways England.</p> <p>With regards to the Newlyn Downs Explosives site, the plans continue to show the route of the development as being beyond the yellow line. Our response for this route would be that we have "no comment" because the development is beyond the expected separation distance.</p> <p>Based on the information provided, we can confirm that providing the proposed road layout remains unchanged in relation to the position of the proposed WWU Indian Queens to St. Day HP Gas Pipeline route, HSE Does Not Advise Against the proposed A30 Chiverton to Carland Cross Scheme.</p>	
REP1-026	Scottish Power Renewables (SPR)	<p>1. Introduction</p> <p>1.1 This Written Representation ("WR") is submitted by ScottishPower Renewables ("SPR") in pursuance of Rule 10(1) of the Infrastructure Planning (Examination Procedure) Rules 2010 in relation to an application under the Planning Act 2008 for a Development Consent Order ("DCO") for the A30 Chiverton Cross to Carland Cross highway improvement scheme (the "A30 Scheme") submitted by Highways England.</p>	Highways England notes that the matters raised are the subject of a position statement [AS-036] submitted at Deadline 1 and ongoing discussions regarding a separate legal agreement.

Reference	Interested Party	Written Representation	Highways England Response
		<p>1.2 SPR is a licensed generator and a statutory undertaker and has a number of major concerns with the A30 Scheme as currently proposed due to the impact it will have on SPR's operational Carland Cross Windfarm (the "Windfarm").</p> <p>2. SPR's principal concerns</p> <p>2.1 SPR's principal concerns relate to the following significant impacts on the Windfarm:</p> <p>2.1.1 Restriction on access to the Windfarm during the construction of the A30 Scheme;</p> <p>2.1.2 Restriction on access to the Windfarm during the operation of the A30 Scheme; and</p> <p>2.1.3 Diversion of Windfarm infrastructure.</p> <p>2.2 SPR provided details of its concerns in its Relevant Representation ("RR"), submitted to the Planning Inspectorate on 8 November 2018. This WR does not repeat the issues raised in the RR. The concerns set out in the RR are still relevant and discussions are ongoing with Highways England to seek to resolve these. As part of this ongoing dialogue, SPR received updated information in respect of the technical solution and legal agreement from Highways England late on Friday 15 February which SPR is currently reviewing.</p> <p>3. Requirement for technical solution, legal agreement and protective provisions</p> <p>3.1 SPR objects to the A30 Scheme to the extent that it impacts on the Windfarm and will maintain this objection unless and until:</p>	

Reference	Interested Party	Written Representation	Highways England Response
		<p>3.1.1 A technical solution is agreed between Highways England and SPR which mitigates the impacts of the A30 Scheme on the Windfarm;</p> <p>3.1.2 Any agreed solution is secured within a legal agreement; and</p> <p>3.1.3 SPR's position is adequately protected through protective provisions within the DCO.</p> <p>4. Updated works plans</p> <p>4.1 It is anticipated that updated works plans and works descriptions will require to be submitted by Highways England as technical discussions progress in order to demonstrate how concerns have been resolved (for example to clearly address the access road tie-in issue highlighted in the RR).</p> <p>5. Rights</p> <p>5.1 The technical solutions currently under discussion to address operational access issues involve the creation of over-run areas at various locations for the benefit of vehicles accessing the Windfarm however it is not clear how Highways England will transfer permanent and uninterrupted rights of access to SPR in respect of the agreed over-run areas, particularly where the relevant land is adopted by Cornwall Council in the future.</p>	
REP1-007	Arqiva Ltd	Following discussions with Jason Prosser of ARUP (acting on behalf of Highways England) we can confirm that the grounds for Arqiva Ltd objections to the above have now been addressed through the provision of mitigation measures.	Highways England notes the formal withdrawal of Arqiva's previous representations.

Reference	Interested Party	Written Representation	Highways England Response
		<p>We therefore request that the representations submitted by Arqiva Ltd be formally withdrawn.</p> <p>Please can you confirm receipt of this email and the withdrawal of the representations.</p> <p>I look forward to hearing from you at your earliest opportunity.</p>	
REP1-029	St Allen Parish Council & Chynoweth Farm	See Appendix B of this document.	All matters are covered in the Highways England response to this Written Representation, which was sent to St. Allen Parish Council on 19 March 2019, and is provided in Appendix B of this document.
REP1-021	NATS	NATS anticipates no impact from the proposal and has no comments to make on the Application.	Highways England notes that NATS anticipates no impact from the proposal and does not have any comments to make on the scheme.
REP1-022	Mr Peter Mewton	<p>POINT 1:</p> <p>I maintain all the points of disagreement and the arguments I made in my original 'Relevant Representation'. I still await a response by the Highways England to that representation.</p>	Mr Mewton's Relevant Representation was responded to as part of the Highways England Comments on Relevant Representations (Document Reference 8.1) [REP1-004].
		<p>POINT 2:</p> <p>For this written representation I would like to emphasise and reiterate all the points I made in that Relevant Representation concerning the Marazanvose & Nancarrow Farm section of the scheme. These I have divided into eight general categories which follow: -</p> <p>a) Severance of the community and farm with the obvious and noted consequences.</p>	<p>Chapter 12 People and Communities of the Environmental Statement (Document Reference 6.2) [APP-065] includes an assessment of the potential effects on walkers, cyclists and horse-riders, considering direct effects (including severance) on routes that are crossed by the proposed development and/or affected during construction.</p> <p>In the area surrounding Nancarrow and Marazanvose the following potential effects were identified:</p>

Reference	Interested Party	Written Representation	Highways England Response
			<ol style="list-style-type: none"> 1. FP 319/16/1 – short section to be permanently extinguished where the proposed A30 crosses its current alignment. 2. Local Route: Quiet Lane – severed by the proposed scheme mainline. <p>In response to these potential effects, Chapter 12 People and Communities of the Environmental Statement (Document Reference 6.2) [APP-065] and the Public Rights of Way Management Plan in Annex M of the Outline CEMP Annexes (Document Reference 6.4) [APP-376] proposes the following mitigation measures:</p> <ol style="list-style-type: none"> 1. FP 319/16/1 – it is proposed that new steps are constructed to the south of the proposed A30 to allow the footpath to continue across the new ‘green bridge’, connecting northwards towards Higher Ventongimps Farm (the C0178). This would provide a new safe crossing of the A30 from this footpath which is considered a betterment when compared to the current situation. 2. Local Route: Quiet Lane – it is proposed that the Quiet Lane would be diverted across the new ‘green bridge’, providing a safe crossing and a link to the Quiet Lane (U6082) running south towards Killivose (via a new Bridleway), without needing to cross the new or existing A30 carriageway. <p>In addition to this mitigation, the Management Plan proposes a new section of bridleway to the west of Nancarrow Farm and south of the new A30. This would provide a new, off-road connection between FP 319/16/1 and Quiet Lanes, enabling enhanced north-south movements.</p>

Reference	Interested Party	Written Representation	Highways England Response
			<p>It is proposed that the new 'green bridge' is constructed in advance of the mainline works and the mitigation above has therefore been identified for 'early re-provision'. This would enable access for users of the PRoW and Quiet Lane network to continue during the main construction period with the improvements to north-south links being available in advance of the mainline works.</p> <p>The Management Plan has been discussed and agreed with Cornwall Council as detailed in section 4, references 14.1 – 14.8 of the Statement of Common Ground with Cornwall Council (Document Reference 7.4(A))[REP1-003] submitted at Deadline 1.</p>
		<p>b) Destruction of one home and one barn with planning approved for my proposed retirement home. Building four new lanes of 'Mile a Minute' expressway closer to three more homes, than the existing two lanes of 60mph trunk road. While leaving six lanes of fast road directly in front of the five remaining homes in Marazanvose therefore causing continued blight of the whole hamlet.</p>	<p>There are four occurrences on the scheme of acquiring residential property. This is detailed in paragraphs 6.1.6 to 6.1.17 of the Statement of Reasons (Document Reference 4.1) [APP-006]. The scheme requires the demolition of a derelict barn at Nancarrow Farm for works associated with the new A30.</p> <p>As set out in paragraph 12.13.35 of Chapter 12 People and Communities of the Environmental Statement (Document Reference 6.2) [APP-065], the derelict barn to be demolished is recognised to be of medium sensitivity, although it does not form part of the operational function of the recreational asset. It confirms the magnitude of impact of its loss would be moderate adverse, given the impact would be a partial loss of the facility. Paragraph 12.13.36 further explains that this potential effect could be mitigated through property purchase / compensation (in line with the compensation code), which would reduce the severity of the effect. Discussions have been held between the District Valuer (on behalf of Highways England) and Nancarrow Farm regarding compensation.</p>

Reference	Interested Party	Written Representation	Highways England Response															
			<p>In terms of noise effects on Marazanvose, Chapter 11 Noise and Vibration of the Environmental Statement (Document Reference 6.2) [APP-064] concludes that properties at Marazanvose would experience a reduction in noise of 1-5dB(A) as a result of the new A30 being further from the properties, and because there would be substantially less traffic on the existing A30.</p> <p>Although the proposed A30 alignment would be closer to Nancarrow Farm properties than the existing A30, no significant operational noise effects have been assessed at Nancarrow Farm with the inclusion of the proposed noise mitigation.</p> <p>In terms of visual effects on Marazanvose, it is acknowledged that there would be significant visual effects on receptors in Marazanvose and parts of Nancarrow Farm. Mitigation has been embedded into the scheme design to avoid these effects and landscape mitigation is provided where possible to further reduce these effects over the fifteen year establishment period.</p> <table border="1" data-bbox="1317 948 2074 1335"> <thead> <tr> <th data-bbox="1317 948 1525 1078">Visual receptor</th> <th data-bbox="1525 948 1742 1078">Construction effects</th> <th data-bbox="1742 948 1908 1078">Yr 1 effects</th> <th data-bbox="1908 948 2074 1078">Yr 15 residual effects</th> </tr> </thead> <tbody> <tr> <td data-bbox="1317 1078 1525 1209">VP 12 Marazanvose</td> <td data-bbox="1525 1078 1742 1209">Large adverse significant</td> <td data-bbox="1742 1078 1908 1209">Large adverse significant</td> <td data-bbox="1908 1078 2074 1209">Moderate adverse significant</td> </tr> <tr> <td data-bbox="1317 1209 1525 1335">VP 13 Nancarrow Villa</td> <td data-bbox="1525 1209 1742 1335">Moderate adverse significant</td> <td data-bbox="1742 1209 1908 1335">Large adverse significant</td> <td data-bbox="1908 1209 2074 1335">Moderate adverse significant</td> </tr> </tbody> </table>				Visual receptor	Construction effects	Yr 1 effects	Yr 15 residual effects	VP 12 Marazanvose	Large adverse significant	Large adverse significant	Moderate adverse significant	VP 13 Nancarrow Villa	Moderate adverse significant	Large adverse significant	Moderate adverse significant
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		<p>c) Taking Nancarrow Farm land that is close to the hub of the farm and so severely damaging established management and movements around the farm. Alternatives will be inferior and make daily work harder and more difficult to run efficiently and viably. A fast and noisy four lane road only a few yards from winter cattle housing will have negative affect on cattle wellbeing and performance. Generations of work and achievement will be effectively destroyed. There is no mitigation for this gross damage. The mitigation of a bridge and track have severe encroachment disadvantages and will be long and difficult therefore only partially effective.</p>	<p>VP 14 Nancarrow Farm House</p>	<p>Slight adverse insignificant</p>	<p>No Change</p>	<p>No Change</p>
			<p>VP 15 outdoor workers, Nancarrow</p>	<p>Moderate adverse significant</p>	<p>Large adverse significant</p>	<p>Moderate adverse significant</p>
			<p>It is acknowledged that the scheme requires a significant amount of land. An Agricultural Impact Assessment (AIA) in Appendix 12.5 of the Environmental Statement (Document Reference 6.4) [APP-366] has been undertaken to quantify the scheme's land take both temporarily and permanently, describing any agreed mitigation. The AIA, assesses the impact of the scheme on land use and assesses impacts on individual farm units (plots) forming part of a farm holding, taking into account agricultural land quality and the likely impact on its functionality in terms of severance and access.</p> <p>Table 12-8 in the AIA shows temporary land take by holding/plot and Table 12-10 shows permanent land take by holding. These tables identify the relevant plots associated with Nancarrow Farm, the area of affected plot and land take. It shows that 9% of the D Mewton and R.J. Mewton are lost, accounting for 41% of the best and most versatile land on these plots. Nancarrow Farm is shown to lose 30% of their plots, which accounts for none of the best and most versatile land.</p> <p>Access has been retained for the farmyard at its current location. The green bridge has been designed to accommodate a tractor and trailer to allow access to the fields on the other side of the existing and new A30. Losses incurred as a result of the scheme would be</p>			

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		<p>d) Environmental damage. Hundreds of 25-year-old trees would be destroyed. Organic farmland is taken which has proven better bio-diversity than conventional farmland. The priceless topsoil has taken 20 years of organic farming to create. The trees provide a screen from the current road, a wildlife corridor and a barrier lifting birds and bats over the road more safely.</p>	<p>subject to compensation in line with the compensation code.</p> <p>It is acknowledged that the existing mature and semimature tree planting along the existing A30 Nancarrow boundary would be removed. Accordingly, proposed landscape mitigation replacement planting comprises just over 3,000m² of oak-rich native woodland screen planting in a 5 to 40m wide belt at the top of the cutting from chainage 7+100 to chainage 7+320 as shown on Sheet 10, Figure 7.6 Environmental Masterplans of the Environmental Statement (Document Reference 6.3) [APP-190], which would provide screening from the road.</p> <p>Habitat loss/gain calculations within Table 8-15 of Chapter 8 Ecology and Nature Conservation of the Environmental Statement (Document Reference 6.2) [APP-061] demonstrate a net gain of 3.7:1 for woodland and 6.9:1 for scattered deciduous and coniferous trees across the scheme as a whole. The initial impact of this habitat loss has been assessed within Chapter 8 as being of a moderate adverse significance. However, once the landscape planting starts to establish throughout construction and operation of the scheme, this significance would reduce to neutral and eventually to moderate beneficial (subject to habitat development over time).</p> <p>The planting and wildlife fencing in this area in particular has been designed specifically to guide bats, otters and badgers up and over the green bridge which would provide an alternative safe crossing point for wildlife. This mitigates for the loss of the existing wildlife corridor in this location, which currently does not stop badgers and otters</p>

Reference	Interested Party	Written Representation	Highways England Response
			<p>from crossing the road and which has resulted in casualties of these species in this area, as shown on Figure 1 in Appendix 8.1 Road Traffic Collision Summary Report of the Environmental Statement (Document Reference 6.4) [APP-331].</p>
		<p>e) Unfairness: - Nancarrow Farm was severed before by the building of the Zelah bypass, 8 acres of land lost and now it's proposed again. It is a smaller farm than the two main farms to the north (which have lost little in the past & peripheral), so the proportion of the farm lost is hugely more for Nancarrow Farm.</p>	<p>It is acknowledged that the scheme requires a significant amount of land, and that land was also previously acquired from Nancarrow Farm for the Zelah bypass.</p>
		<p>f) Severe damage to the ability of the farm diversification wedding & venue business to continue as successfully. The presence of the road will cause permanent harm and during the construction temporary disruption of business is likely. Maximum cooperation of Highways England to minimise this is essential.</p>	<p>Paragraph 12.7.101 of Chapter 12 People and Communities of the Environmental Statement (Document Reference 6.2) [APP-065] states:</p> <p><i>“The approach to clarifying the sensitivity of tourism and recreation receptors has been agreed with Cornwall Council and Visit Cornwall, taking into account the nature of the asset, degree of permanence and ability to relocate, as well as location... For the purposes of this assessment... the more regional assets of [Nancarrow Farm] are of a medium sensitivity.”</i></p> <p>Chapter 12 People and Communities of the Environmental Statement (Document Reference 6.2) [APP-065] assesses that the direct and indirect effects of the scheme would cause a slight adverse impact on the business at Nancarrow Farm during construction and operation.</p> <p>As set out in Appendix B of Annex E of Highways England's Comments on Relevant Representations (Document Reference 8.1) [REP1-004], engagement has</p>

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		<p>g) A viable alternative route could be constructed to the north of the whole of Marazanvose. It would have many advantages and none of the severe disadvantages to the community, farms or business. The quality of the living environment of Marazanvose and all who live there could be transformed FOR THE BETTER.</p>	<p>been ongoing to minimise the effects of the scheme on Nancarrow Farm.</p> <p>Highways England has sought to develop the alignment and design of the scheme through an iterative process, in which alternative options for the route have been considered.</p> <p>Please refer to the Highways England response to Question 1.9.1 in the Responses to the Examining Authority's Written Questions submitted at Deadline 2 (Document Reference 8.4).</p>
		<p>h) The emotional strain on my family, for whom I have devoted my life's work, and on me, caused by this unnecessary destruction of our achievements has been inhuman. This factor has been ignored during all our appeals, arguments and conversation with Highways England and consultant personnel.</p> <p>That concludes my Written Representation.</p>	<p>The willingness of Mr Mewton and Mr and Mrs Chamberlain of Nancarrow Farm to engage with Highways England is appreciated. The extent of engagement is evidenced in Appendix B of Annex E of Highways England's Comments on Relevant Representations (Document Reference 8.1) [REP1-004]. This will be ongoing and captured within the Statement of Common Ground being prepared with Nancarrow Farm.</p>
	<p>Steve & Lucy Chamberlain Nancarrow Farm</p>	<p><u>1. INTRODUCTION:</u></p> <p>Nancarrow Farm comprises of a Grade II listed Farmhouse, 100 acre certified organic farm, and award winning Events Venue with annual turnover of £1 million and economic contribution of nearly £3 million. There is also a bungalow on site (occupied by an elderly relative requiring round the clock care) and the same family have lived and farmed at Nancarrow since 1782.</p> <p>The impacts at Nancarrow Farm are multiple and complex including;</p> <ul style="list-style-type: none"> - Removing a small barn with planning permission to create a residential dwelling for one of the land owners. 	<p>These matters have been responded to in the Highways England response to the Nancarrow Farm Relevant Representation in Annex E of the Comments on Relevant Representations (Document Reference 8.1) [REP1-004] submitted at Deadline 1.</p>

Reference	Interested Party	Written Representation	Highways England Response
		<p>Groundworks already underway when the proposed route was announced in October 2016 putting a halt to the works and in turn forcing the land owner to live off the farm)</p> <ul style="list-style-type: none"> - Removing key strategic fields adjacent to the farmyard with no mitigation putting into question the feasibility of the farm business. - Damaging the setting of the Grade II listed Farmhouse and Garden - Significantly jeopardizing the events business as a result of significantly adverse disruption during construction works, and risk of increased noise, land loss, and visual impact post scheme. - Removal of existing access onto A30 and removal of established tree border screening the existing road. - Further severing farmland north of the A30 at Marazanvose from the main farm south of the A30. - Severe damage to the setting of Nancarrow Villa. <p>We have engaged pragmatically with HE throughout the process, attending multiple meetings and providing detailed consultation responses. A summary of our concerns is in our relevant representation. We understand HE are in the process of submitting a detailed response to our representation and expect to respond in detail once we have received this.</p>	
		<p>2. SOCG</p> <p>We welcome the opportunity to work on a statement of common ground at the earliest opportunity. It will help to progress current challenges in dialogue between</p>	<p>As identified in Statements of Common Ground (Document Reference 7.4(B)), a draft Statement of Common Ground was issued to Nancarrow Farm on 6 March 2019.</p>

Reference	Interested Party	Written Representation	Highways England Response
		<p>Nancarrow Farm and HE. We have not received the first draft from HE to date.</p> <p>3. MATERIAL CONSIDERATIONS</p> <p>Alongside our objections outlined in our relevant representation and detailed in our consultation response we would like to draw your attention to the following;</p> <p><u>A. Vertical alignment</u></p> <ul style="list-style-type: none"> • Vertical alignment (VA) of the road as it passes through Marazanvose at PRA was 4.74 metres below existing levels which was presented as mitigation against the visual and noise impacts of the preferred route (which severs Marazanvose). At the statutory consultation the VA of the road as it passes through Marazanvose was raised to 1.5 metres below existing levels, an increase of 3.24 metres. This is a fundamental change to the route as assessed during the route selection process. The current level of the VA passing through Marazanvose is approximately 2.5 metres below existing levels but this must be seen in the context that the preferred route announcement was based on 4.74 metres below existing levels. This change has significantly adverse implications for: <ul style="list-style-type: none"> ▪ noise, visual impact and living conditions for all Marazanvose residents (see also relevant representations 086 and 101); and ▪ business impacts at Nancarrow (see below 'Screening/Visual and Noise Impact Mitigation'). 	<p>The purpose of the Preferred Route Announcement is to protect land required for the proposed route from development. The engineering design was developed further following this announcement and was subject to the statutory consultation from 29 January to 12 March 2018, as detailed in the Consultation Report (Document Reference 5.1) [APP-029].</p> <p>At the section of the scheme adjacent to Marazanvose, the level of the road was lowered by approximately 2 metres in response to comments received at statutory consultation. The proposed road level allows an acceptable highway drainage solution for the new A30, taking into account the geotechnical constraints of high ground water levels, and the need for the outfall to the adjacent watercourse in this location. Lowering the road level any further would lead to groundwater problems with the earthworks and with the highway drainage pond number 10, as shown on Sheet 4 of the Works Plans, (Document Reference 2.4(B)).</p> <p>The combination of the 2 metres cutting, the 3 metres high close boarded noise barriers, and the oak rich woodland screen planting at the top of the cutting extends the visual and noise screening to a minimum total height of 5 metres. This is the equivalent height of screening to the vertical alignment which was discussed at Preferred Route Announcement.</p>

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		<ul style="list-style-type: none"> The DCO correctly states that the VA has lowered since consultation, but it remains significantly higher than at PRA when it was used to argue the case for the current route through Marazanvose. The response to statutory consultation in February 2018 used the VA at the green bridge to illustrate the changes in VA, not the more significant location, in central Marazanvose (directly in front of the cottages) which is also in close proximity to Nancarrow Villa, Nancarrow Farm, and Marazanvose Farm. Any responses by HE referring to a ‘lowering’ of vertical alignment as a result of concerns raised should be viewed in this context. 	<p>Please refer to the Highways England response to Question 1.9.1 in the Responses to the Examining Authority’s Written Questions submitted at Deadline 2 (Document Reference 8.4).</p>
		<ul style="list-style-type: none"> VA in this section has been greatly debated. We remain very concerned about any flexibility that may allow the vertical alignment to be raised during the construction works as this significantly increase the adverse impacts in this very sensitive area. 	<p>A stated in paragraph 4.3.7 of Chapter 4 Approach to Environmental Impact Assessment of the Environmental Statement (Document Reference 6.2) [APP-057] the vertical limit of deviation is restricted in the area of Nancarrow Farm and Marazanvose, meaning that the flexibility to increase the level of the road is not available in this area.</p> <p>This is secured in Article 8 of the draft DCO (Document Reference 3.1(B)) [AS-031] and shown on Sheet 4 of the Works Plans (Document Reference 2.4(B)).</p>
		<p>B. Screening/Acoustic Panel Fencing/Landscape Mitigation</p> <p>A number of meetings between HE and Nancarrow Farm have been held to try to mitigate the noise and visual impacts of the road as it passes through Marazanvose from the green bridge to the land boundary at which point it demolishes the neighbouring residence Marazanvose</p>	<p>These matters have been responded to in the Highways England response to the Nancarrow Farm Relevant Representation in Annex E of the Comments on Relevant Representations (Document Reference 8.1) [REP1-004] submitted at Deadline 1.</p>

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		<p>Farm. This is a particularly sensitive and complex area for the farm as a number of impacts occur in this chainage. Grooms Cottage (barn with planning permission) is demolished, access is removed, access to the farm yard, cattle handling area and lambing shed is impinged due to green bridge construction, land immediately surrounding the farmyard and handling area is lost, nearly 200 metres of mature native copse (providing current visual screening and valuable wildlife habitat) is removed . This section is also closest to the listed farmhouse and events venue barns with significant implications for noise and visual impact on both cultural heritage assets and the business.</p> <p>The impact of the raised vertical alignment here has resulted in considerable discussions about how best to mitigate the effects of the road.</p>	
		<p>Current mitigation design is in the form of a 3m acoustic barrier. This has been agreed as a result of a number of meetings with HE's visual and landscape team. This final design is the best solution available and we consider this mitigation to be essential in order that both short and long term impacts are to be minimised. A 6ft stone hedge which has been proposed in other areas increases strategic land take even further, and crucially does not provide the same level of visual or acoustic screening to mitigate noise and visual impacts on the Grade II listed farmhouse, farm workers, and an incredibly noise sensitive wedding & events business.</p>	<p>These matters have been responded to in the Highways England response to the Nancarrow Farm Relevant Representation in Annex E of the Comments on Relevant Representations (Document Reference 8.1) [REP1-004] submitted at Deadline 1.</p>

Reference	Interested Party	Written Representation	Highways England Response
		<p><u>C. Protective Provisions / Mitigation During Construction</u></p> <p>Noise impact during construction is a significant concern with regard to business impact. This concern has been raised by all at Nancarrow Farm since the scheme was announced in October 2016. HE were made aware that wedding enquiries for 2020 would begin in September 2018 and planned mitigation for impacts during construction would need to be in place as soon as possible after this date.</p> <p>In the CEMP, HE state that business impacts can be mitigated, yet have not yet committed to the level of detail required to actually prevent significant business loss, despite being presented with a range of options; including temporary full / part closure to allow for works to take place uninterrupted. To date, HE have only agreed to 9 dates where works will not take place near the venue. We would anticipate hosting 55-60 wedding ceremonies at Nancarrow each year and so are seeking much greater levels of mitigation than the current commitment.</p> <p>The current level of business disruption will be catastrophic to a thriving, award winning business with job losses inevitable and a wider economic impact which threatens the £3 million contributed to the local economy each year.</p>	<p>These matters have been responded to in the Highways England response to the Nancarrow Farm Relevant Representation in Annex E of the Comments on Relevant Representations (Document Reference 8.1) [REP1-004] submitted at Deadline 1.</p>

Reference	Interested Party	Written Representation	Highways England Response
		<p>It is essential that a site specific construction mitigation plan is legally documented so that wedding bookings can be taken with confidence that there will be no construction related disturbance. Without such guarantees, the risk of disruption on the day means it would be immoral for us to accept a wedding booking. The uniqueness of a wedding ceremony in terms of sensitivity to noise should be properly considered and mitigated for.</p> <p>To date (despite assurances) none of the agreed limitations have been included in the DCO or the CEMP. We are unable to take bookings after June 1 2020 outside of the 9 pre-agreed dates. This is already having a significantly detrimental impact on the business and its cashflow. Access to the farmyard will also need to be maintained during construction. HE is of the opinion that compensation for business losses during construction is not claimable, but are not prepared to agree reasonable mitigation. Accordingly, urgent action is required to legally secure robust mitigation measures.</p> <p>As it currently stands the business impacts used to justify the route selection are severely understated, significantly flawed and not credible.</p>	<p>Restriction of construction activities will be confirmed through an appropriate mechanism between Highways England and Nancarrow Farm, which is the subject of discussion between the two parties.</p>
		<p><u>4. Route Selection</u></p> <p>We have challenged the route selection process in detail both in our consultation response and in a number of letters to HE. There have been responses to some of the points raised although many of these responses have again been challenged. Other residents of Marazanvose have also questioned the route selection process in Marazanvose (see relevant representations 088 and 101) as have the St Allen Parish Council (February 2019). All</p>	<p>Please refer to the Highways England response to Question 1.9.1 in the Responses to the Examining Authority's Written Questions submitted at Deadline 2 (Document Reference 8.4).</p>

Reference	Interested Party	Written Representation	Highways England Response
		<p>residents in Marazanvose are impacted by the construction of the new road including the only existing residence on the scheme to be demolished, a residence which will see the highest increase in air pollution on the route (PIER) and a large percentage of her land being taken for a drainage pond. The impact of route selection at this location on the route has huge impacts on all residents of Marazanvose. We greatly support the close examination of the information gathering and assessment process by HE which led to this decision.</p>	
	The Harvey Family	<p>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.</p>	<p>Planting in the vicinity of the Pennycomequick house and the adjacent field (the property of the Harvey Family) is shown on Sheet 15 of Figure 7.6 Environmental Masterplans (Document Reference 6.3) [APP-195]. The plan shows:</p> <ul style="list-style-type: none"> • Species rich grass and specimen native tree planting immediately to the west of the realigned C0075. • 5 to 10m wide belts of mixed native woodland planting along the realigned section of the lane. • 1.2m high planted Cornish hedgerows and wildflower seeded verges along either side of the Lane. <p>This planting is required to replace trees lost, to recreate the character of an enclosed rural lane and to better integrate the scheme into the landscape.</p> <p>Following further discussions with Mr Harvey, it has been agreed that the northern 50m of the woodland belt along the eastern side of the lane would be removed from the Environmental Masterplans, which will be updated and submitted to the Examination at a later deadline.</p>

Reference	Interested Party	Written Representation	Highways England Response
			<p>This amendment will be more in keeping with the existing condition of Pennycomequick Lane, which currently comprises a Cornish hedge with vegetation. Following construction of the scheme, including the realignment of the C0075, the 5m wide area of land to the east of the Cornish hedge can be returned to Mr and Mrs Harvey's ownership, as shown on Sheet 8 of the Land Plans (Document Reference 2.2) [APP-013].</p> <p>The land is required to construct the access track to Pond 14, shown as Work No 1(h) on Sheet 6 of the Works Plans (Document Reference 2.4(B)); and Sheet 6 of the General Arrangement and Section Plans (Document Reference 2.6) [APP-017]. Pond 14 was previously located to the south of Pennycomequick house and was moved to its current location in response to concerns raised by the Harvey Family during the statutory consultation. The vegetation on the stream will be protected during the construction, as indicated by the red cross hatched area over the stream on Sheet 15, Figure 7.6 Environmental Masterplans (Document Reference 6.3) [APP-195].</p>
		Confirmation is sought that stone hedges will be built to either side of the C0075 where it bisects our land.	As shown on Sheet 15 of Figure 7.6 Environmental Masterplans (Document Reference 6.3) [APP-195], a 1.2m Cornish Hedgerow with vegetation is proposed on both sides of the quiet lane at Pennycomequick, from the existing A30 to the new A30. This hedge is to replace that lost, to recreate the character of an enclosed rural lane and to better integrate the scheme into the landscape.
		Confirmation is sought that an access into our wild flower meadow will be provided.	Access to the wildflower meadow will be shown on updated plans to be submitted at Deadline 3. It has been agreed in discussions with Mr Harvey that the existing access gap into the meadow to the east of the realigned

Reference	Interested Party	Written Representation	Highways England Response
			<p>C0075 would be stopped up by the proposed Cornish hedge, and a new access created 50m further south to a location opposite the extended Pennycomequick garden access. A farm gate would be provided in this location.</p> <p>This change will be shown on an amended version of Sheet 15, Figure 7.6 Environmental Masterplans of the Environmental Statement (Document Reference 6.2) [APP-195] to be submitted at a later deadline. The change will also be shown on Sheet 6 of the Rights of Way and Access Plans (Document Reference 2.5(B)); Sheet 6 of the Works Plans (Document Reference 2.4(B)); and in the draft DCO (Document 3.1(C)) to be submitted at a later Deadline.</p>
		<p>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.</p>	<p>Highways England does not consider the realignment of Pennycomequick Lane as part of the scheme to have any detrimental impact on the safety of this lane. The proposed design standards for the realignment have been agreed with the Local Highway Authority (Cornwall Council), as confirmed at reference 19.5 in Section 4 'Matters Agreed' of the Statement of Common Ground with Cornwall Council (Document Reference 7.4(A)) [REP1-003] submitted at Deadline 1.</p>
		<p>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.</p>	<p>The proposed construction compound is required for the construction of the Pennycomequick Lane underpass structure. This would be constructed before the realigned Pennycomequick Lane running through the underpass could be constructed. The compound would be accessed from the existing Pennycomequick Lane with the final access layout to be developed by the contractor with engagement with adjacent land owners on Pennycomequick Lane.</p>

Reference	Interested Party	Written Representation	Highways England Response
			<p>Any deliveries to the compound would be managed to ensure that traffic does not back up onto the existing A30 and standard warning signage would be implemented on the lane to notify through-traffic of the construction compound access. Measures to manage traffic during construction are contained in the Traffic Management Plan, Appendix 1.2 of the Environmental Statement (Document Reference 6.4) [APP-300].</p>
		<p>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.</p>	<p>The presence of an underpass structure at Pennycomequick, as part of the scheme, has been taken account of in the assessment of landscape and visual effects in Chapter 7 Landscape of the Environmental Statement (Document Reference 6.2) [APP-060]. Based on preliminary design information for this assessment, it was assumed that all proposed underpasses, including the one at Pennycomequick, would be simple precast concrete underbridges.</p> <p>The detailed design of the form and finish of this structure will be carried out during the implementation of the scheme, subject to Requirement 12 of the draft DCO (Document Reference 3.1(C)).</p>
		<p>Confirmation by the Applicant of the extent of mitigation works at Pennycomequick for the construction period is still awaited.</p>	<p>As stated in paragraph 7.10.36 of Chapter 7 Landscape of the Environment Statement (Document Reference 6.2) [APP-060], for the construction phase, environmental measures have been developed as part of the iterative design. These have been accounted for in the assessment of effects without landscape mitigation. These environmental commitments are incorporated into the Outline CEMP (Document Reference 6.4) [APP-375], and include:</p>

Reference	Interested Party	Written Representation	Highways England Response
			<ul style="list-style-type: none"> • Protect and retain valued existing vegetation and other landscape features (in particular; trees, woodland, hedgerows and Cornish hedgerows) wherever possible in accordance with <i>BS5837:2012. Trees in relation to design, demolition and construction. Recommendations</i> and the scheme Arboricultural Impact Assessment in Appendix 7.6 of the Environmental Statement (Document 6.4) [APP-365]. • Produce procedure to record, protect, heritage assets and where necessary remove and reinstate Grade II Listed milestones. • Production of a construction stage lighting strategy to limit the use of construction lighting and ensure all essential lighting is specified and designed to reduce light spill. • A commitment to reinstate to its current condition, disturbed land not required for the permanent works following completion of sections of the scheme and associated environmental mitigation, • Stripping handling and management of soils in accordance with DEFRA (2009) Construction Code of Practice for the sustainable use of soils on construction sites. • Implementation of a hierarchy of mitigation to PRow and WCH routes both during construction and operation. • Considerate construction management. <p>Due to the short-term and temporary nature of the construction effects identified, it is not considered feasible to include any additional landscape mitigation measures to further reduce the construction phase effects.</p>

Reference	Interested Party	Written Representation	Highways England Response
			<p>For construction, temporary significant noise effects have been assessed at Pennycomequick for certain periods of the construction works.</p> <p>Best Practicable Means (BPM) in respect to controlling noise and vibration is assumed as incorporated mitigation within the Outline CEMP (Document Reference 6.4) [APP-375]. This would include selection of quiet equipment, review of programme and methodology to consider quieter methods, appropriate location of equipment on site, control of working hours and the provision of acoustic enclosure screening where practicable.</p>
		A fresh land plan needs to be produced by the Applicant showing the extent of the land to be returned to us.	The land interest plan at Appendix C was sent to Mr and Mrs Harvey on 2 January 2019.
		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.	Around the house itself at Pennycomequick, noise levels would reduce, as shown on Figure 11.3 Operational Noise Difference Contour Map – Future Assessment Year (2038) Sheet 2 of 3 of the Environmental Statement (Document Reference 6.4) [APP-297]. This is because the noise contribution from the existing A30 would be reduced as a result of lower traffic flows. Figure 11.3 shows that noise increases from the proposed A30 alignment to the south, would occur at the southernmost end of the garden at Pennycomequick.
REP1-018	Mr and Mrs Warrener Marazan Farm and	The hamlet of Marazanvose is practically clogged most of the year with traffic fumes (petrol and diesel) from mostly stationary local and holiday traffic, trying to get home. It is the last memory tourists remember: sitting in a queue, heading east, on the A30 trunk road, between Chiverton and Carland Cross roundabouts.	Highways England note the support for the alignment through Marazanvose.

Reference	Interested Party	Written Representation	Highways England Response
	Caravan Park	<p>How can an up-to-date newly engineered dual carriageway be inferior to the existing: forty + year old, noise generating materials, narrow, potholed, constantly patched-up, black spot, at Marazanvose. It can not. Leaving existing in place until replacement is operational is common sense, the impact on the local community of Zelah and Marazanvose would be colossal if an independent road was not constructed, but the existing was broken into and diverted elsewhere. Nobody holidaying or resident would escape the major implications to daily life, during construction, or once operational; taking it closer to vastly populated settlements.</p> <p>During construction, with the closure of the only, quiet, caravari park at Marazanvose, and when operational, the new A30 noise and vibration output should not outstrip current excessive, commercial noise emitted from nearby enterprise, presently tolerated locally, by neighbouring properties, and their visitors. Local and national benefits to health, road safety, and freedom of movement outweigh any temporary discomfort caused by its implementation. t</p>	
		Cutting in so deep at Marazanvose we find questionable. Is it necessary, in regards to the impact on existing wildlife, the wider community, and the environment, to delay progress this way, with no obvious benefit to residents.	The vertical alignment through Marazanvose was lowered following statutory consultation to reduce noise and visual effects of the scheme (see the Highways England Response to the Written Representation of St Allen Parish Council at Appendix B of this document for further detail).
		<p>Highways England, compulsory acquisition, Blight Notice service.</p> <p>This current team's ability to organize, communicate, and their people skills, we feel are non existent. Their energy it seems now, since 2nd Jan' 2018, B.N. acceptance, has doggedly been on the bigger picture: securing their DCO,</p>	<p>Mr and Mrs Warrener were notified of the statutory consultation and the application for the Development Consent Order.</p> <p>Negotiations regarding the purchase of Mr and Mrs Warrener's property by Highways England are ongoing. The District Valuer (on behalf of Highways England) has</p>

Reference	Interested Party	Written Representation	Highways England Response
		no matter what life changing effect the project has on interested parties; keep them in the dark, leave them off mailing lists, don't reply to emails, and in some cases be downright rude.	made an offer to purchase the property to which no response has been received.
REP1-019	Mrs Marion Eley	<p>Please find attached a copy of a letter hand delivered to my home today.</p> <p>It is meant for you, and so I am happy to forward it to you.</p> <p>With my very best wishes, Jonathan. Cllr JRR McCulloch JP. Chairman, St Allen Parish Council.</p> <p>Dear Sirs or Madam</p> <p>Could you please consider a bridge in Marazanvose.</p> <p>It would be a great help to farms near me in Marazanvose.</p> <p>I will be very glad when the road is complete, for my family</p> <p>Thank you for your time</p>	<p>Improvements to the crossroads to the south of Mrs Eley's farm on the U6082 are being made to enable access to Marazanvose Farm from the C0089 toward Shortlanesend. This is shown as Work No. 75 on Sheet 4 of the Works Plans (Document Reference 2.4(B)).</p> <p>Further detail is provided in the Highways England response to St Allen Parish Council's Written Representation at Appendix B of this document.</p>

Reference	Interested Party	Written Representation	Highways England Response
REP1-011	Cornwall Countryside Access Forum	<p>GENERALLY: This representation is made on behalf of Cornwall Countryside Access Forum, and amplifies the points made in our initial summary Written Representation made on 7th November 2018.</p> <p>The Forum, (set up under the provisions of the CROW Act to advise Section 94 bodies on matters of access and rights of way) was in consultation with and has issued advice to Highways England in 2018 in connection with this Scheme, the bulk of which advice has been accepted and acted on.</p> <p>There are though a number of points arising from the August 2018 and subsequent versions of the works plans on which we have been unable to consult with HE, and it is these points that give rise to the specific comments set out below.</p> <p>The Forum generally supports the Scheme, and in so far as it makes provision for walkers, cyclists and horse riders we commend HE for the planned provision, providing connectivity for the public rights of way network both north and south of the “new” A30, which will considerably enhance the present (totally inadequate) provision.</p> <p>SPECIFIC COMMENTS: Based on the project updates, particularly the dDCO Version B and the rights of Way and Work Plans published as at 07.02.19.</p> <p>1. CHIVERTON CROSS:</p> <p>a. Signage provision for eastbound cyclists on A30 coming from West Cornwall – we are concerned on both grounds of safety and convenience that adequate signage provision is made to direct eastbound cyclists, particularly “End to Enders”, off the new A30 and onto the de-trunked old A30.</p>	<p>Highways England acknowledges the status of the Cornwall Countryside Access Forum (CCAF) and the general support for the scheme.</p> <p>Some points below replicate Highways England’s comments on the Relevant Representation made by CCAF at Deadline 1 in the Comments on Relevant Representations (Document Reference 8.1) [REP1-004]. This is referred to where relevant.</p> <p>As stated in the Highways England response to the CCAF Relevant Representation:</p> <p><i>Signage would be provided on the existing A30 trunk road to notify eastbound cyclists of the approaching prohibition on the new A30 and direct them off at the new Chiverton junction. Signage would also be provided to direct cyclists through the new Chiverton junction.</i></p>

Reference	Interested Party	Written Representation	Highways England Response
		<p>b. Chiverton Grade Separated Junction – whilst 2m footway/cycleways are provided both to the slip roads and the gyratory, we are concerned on grounds of safety and convenience as to the detail of crossing provision, particularly at the roundabout, and would ask for consideration to be given to providing controlled crossings at the slip road and side road crossing points.</p>	<p>At Chiverton Junction, off-carriageway restricted by-ways are being provided between the B3277 and A3075 and between the A390 and the existing A30, with a restricted byway and underpass under the new A30 between the B3277 and A390. This means that there would be no need for walkers and cyclists to cross the roads leading to the junction roundabout. This is shown on Sheet 1 of the Rights of Way and Access Plans (Document Reference 2.5(B)).</p>
		<p>c. Proposed underpass for WCH (Ref: PR2) – We have been told by HE that this will be 4m wide (inadequate), with 2.7m headroom (again inadequate) and 70m in length (too long). As a crossing place even for led horses, whilst much needed, it is not acceptable. We are concerned both for the safety and convenience of users, not only equine, but as this is a potentially busy cycle commuter route, for possible horse/cycle conflict. Of necessity it will have to be artificially lit, which is not really acceptable for equine users. The headroom provision is totally inadequate for mounted use by horse riders. As part of the St Agnes to Truro commuter cycle route the underpass is approximately 600 metres off-line of route, and therefore adds about 1.2km to the St Agnes to Truro commute. It is our advice that this underpass is both ill-conceived and inadequate for its intended purpose, and should either be totally redesigned, or scrapped. (See para. e. below).</p>	<p>The underpass has been designed as a straight continuous alignment with width and height dimensions greater than the minimum required standards for an unsegregated walking, cycling and horse riding route. These are specified in DMRB Interim Advice Note (IAN) 195/16 and TD36/93 and guidance from Sustrans and British Horse Society.</p> <p>IAN 195/16 states that minimum width should be 3 metres and minimum height should be 2.2 metres for cyclists and 2.7m for horses (if dismounted). The height of the proposed underpass is 2.7 metres and the proposed width is 4 metres.</p> <p>The exit would be visible on entering the underpass and there would be very good visibility to, from and through the underpass. The underpass is not considered to cause any specific horse/cycle conflict.</p>

Reference	Interested Party	Written Representation	Highways England Response
		<p>d. Proposed WCH bridge on line of the A390 – B3277 Truro to St Agnes roads – Off the record indications are that HE are proposing an overbridge on the approximate site of the existing Chiverton Cross roundabout, as part of the Designated Funds works outside of the main scheme, which if true we welcome. We would advise that this should be reconsidered as part of the main scheme (and funded as such). We understand that as a DF project it would have to be built in advance of the main scheme, at a greater height (to get clearance over the existing carriageway). We are concerned at a lack of information, but would advise that it needs to be designed for use by ridden horses as well as cyclists and walkers, with adequate track width and parapets sufficiently high to accommodate safe equine use.</p> <p>e. Preferred solution: We appreciate that there may be a matter of timing, but our preferred solution to the Chiverton Cross NMU problem, would be to scrap the proposed underpass, and to use the cost savings to at least partly fund the bridge, which should be brought into the main scheme. It should be as near the A390 – B3277 route line as possible, with links as required to the de-trunked old A30.</p>	<p>It is not considered that a new link from the B3277 to the A390 at the location of the existing Chiverton Roundabout is required as part of the scheme. This is because an alternative crossing facility is provided at the new Chiverton Junction. The diversion distances of the proposed underpass are similar to the current diversion over the A30 using Kea Downs Road.</p> <p>The proposed crossing facilities and underpass at the new Chiverton junction also facilitate use by equestrians, with riders to dismount before entering the underpass. DMRB TA91/05 confirms that underpasses by equestrians compared to bridges.</p> <p>Justification for the proposals at Chiverton junction are provided in Highways England's comments on the Relevant Representation made by Truro Cycling Campaign and responded to by Highways England at Deadline 1 in Annex G of the Comments on Relevant Representations (Document Reference 8.1, Annex G) [REP1-004], and in the Highways England response to Question 1.11.3 in the Responses to the Examining Authority's Written Questions (Document Reference 8.4) submitted at Deadline 2.</p>
		<p>2. CHYBUCCA G/S JUNCTION: We note the WCH provision through and around the new junction (PR4 & 5), but are concerned as to the detail of crossing point provision for north – south WCH traffic at the new roundabout, and would advise that consideration to be given to providing controlled (possibly Pegasus) crossings.</p>	<p>The proposed uncontrolled WCH crossings have been designed to the relevant standards including DMRB TA91/05 Provisions for Non-Motorised Users and have been agreed with the Cornwall Council as detailed in the Statement of Common Ground with Cornwall Council (Document Reference 7.4(A)) [REP1-003] submitted at Deadline 1.</p> <p>The crossings would be located close to the roundabouts and would use the junction splitter islands to reduce the</p>

Reference	Interested Party	Written Representation	Highways England Response
			crossing distances. Vehicle speeds would be low on both approaches to the crossing, with traffic either manoeuvring through the roundabout junction or slowing on the approach to the junction, with very good visibility to and from the crossings.
		3. MARAZANVOSE / NANCARROW FARM: We welcome the provision of the WCH crossing on the green bridge and the associated links (PR7 & 8) with Killivose lane to the west and the joining up to the existing footpath from Nancarrow to the east.	This is noted.
		4. EXISTING TWO BURROWS UNDERBRIDGE: Noting the stopping-up of the northern arm of the Shortlanesend – Two Burrows road, north of the old A30, (C0080 & part NCR 32), we advise that this short length of road should be retained past St Frieda’s and re-designated as a bridleway to provide an alternative link back to Zelah village, taking WCH away from the new road junction at Chyverton Lodge. The under bridge already provides part of the infrastructure necessary, and links to the Bridleway/Restricted Byways east to Hillhead/ Zelah Lane Farm and West to Costislost to Zelah Lane Farm. (recently approved by the Secretary of State under DMMO).	As stated in the Highways England response to the CCAF Relevant Representation: <i>The NCN route is proposed to run on carriageway as existing and follow the new road layout of the realigned existing A30 and the Shortlanesend Road as shown in the PRoW Management Plan in the Outline CEMP (Document Reference 6.4, Appendix 16.1, Annex M) [APP-376] and in Sheet 5 of the Rights of Way and Access Plans (Document Reference 2.5(A)) [AS-030].</i> <i>This new road layout has been developed to avoid a crossroads junction and locate the new junctions to maximise visibility to and from the side roads. These are also the safest locations for the cyclists to wait and cross the realigned existing A30. To the south of the new A30 there would be a bridleway (Hill House) to maintain the north-south link at Tolgroggan. This arrangement has been discussed and agreed with Cornwall Council in the Statement of Common Ground with Cornwall Council (Document Reference 7.4(A), Appendix A) [REP1-003] and would provide safe continued access for horse-riders.</i>

Reference	Interested Party	Written Representation	Highways England Response
		<p>5. CHURCH LANE, ZELAH (PR11): We question the position and alignment of the new WCH underpass Church Lane/U6083, which links U6083 to Church Lane north of the A30 via the old A30 stepped crossing. We submit that this fails to provide a proper link, particularly as it is to be designated as a bridleway, and does not fully restore the Church Lane/U6083 route to its former use or utility. The existing crossing of the old A30, which entails the use of a lengthy concrete stairway either side of the high road embankment, would remain inaccessible and impractical to both cyclists and horse riders. To make equitable (and safe) provision for all WCH users, the new link needs to be on the line of U6083 with provision of an underpass under both the new and old A30 roads to take all WCH users into the heart of the village. The present proposal is inadequate for its stated purpose.</p>	<p>As stated in the Highways England response to the CCAF Relevant Representation:</p> <p><i>The underpass would provide a diversion to connect into the existing route, which involves stepped access. This approach has been discussed and agreed Cornwall Council in the Statement of Common Ground with Cornwall Council (Document Reference 7.4(A), Appendix A) [REP1-003]. The route for cyclists and horse riders is via Trevalso Lane as existing.</i></p>
		<p>6. CARLAND CROSS:</p> <p>a. The Forum particularly welcomes the propose WCH link (PR14) using the old A30 route and the new underpass to maintain north – south connectivity. We also welcome the proposed WCH link (PR15) to Mitchell using the original A30 road.</p>	<p>This is noted.</p>
		<p>b. However, we have been told that the crossings for WCH on the southern side of the existing roundabout (A39), (linking PR14 to PR15) will remain as at-grade crossings, utilising the refuge island for crossing between the two-lane northbound and two lane southbound traffic. This will involve WCH crossing four lanes of traffic, at a busy junction (particularly busy at rush-hours) which we consider to be potentially dangerous. Consequently, we advise that consideration to be given to providing controlled crossings (possibly Pegasus crossings) on the</p>	<p>The bridleway from the new underpass west of the Carland Cross junction to Mitchell (PR14 and PR15 as shown on Sheet 8 of the Rights of Way and Access Plans (Document Reference 2.5(A)) [AS-030] would connect into the existing crossing at the Carland Cross roundabout. This is located close to the roundabout and uses the junction splitter island to reduce the crossings to an acceptable distance.</p>

Reference	Interested Party	Written Representation	Highways England Response
		<p>existing footway to form a continuous safe WCH route from Mitchell to the old A30.</p>	<p>Vehicle speeds will be low on both approaches to the crossing. This would be due to traffic either manoeuvring through the roundabout junction, or slowing on the approach to the junction. The current crossing width is similar to the existing uncontrolled walking, cycling and horse riding crossing further south on the A39.</p> <p>Given the above, it is not considered that a controlled crossing would be necessary in this location.</p>
		<p>7. MITCHELL: Signage provision for westbound cyclists on the existing dualled A30 coming from East Cornwall – we are again concerned on both grounds of safety and convenience that adequate signage provision is made to direct westbound cyclists, particularly “End to Enders”, off the new A30 and onto the de-trunked old A30 via Mitchell and Carland Cross.</p> <p>This written representation is made by me, Nick Jeans, on behalf of Cornwall Countryside Access Forum.</p>	<p>As stated in the Highways England response to the CCAF Relevant Representation:</p> <p><i>As described in Section 3.4 of the PRow Management Plan in the Outline CEMP (Document Reference 6.4, Appendix 16.1, Annex M) [APP-376], Highways England and its Contractor (once appointed) would provide appropriate signage for re-provided and new public rights of way (including for cyclists) to be agreed with Cornwall Council.</i></p>
REP1-034	Truro Cycling Campaign	<p>1. Compliance with national policies</p> <p>Policy requirements – strategic – national guidance to support cycling as part of major road schemes</p> <p>1.1 The National Policy Statement for National Networks (NPSNN) states in paragraph 3.17 (under Sustainable Transport) that:</p> <p>'There is a direct role for the national road network to play in helping pedestrians and cyclists. The Government expects applicants to use reasonable endeavours to address the needs of cyclists and pedestrians in the design of new schemes. The Government also expects applicants to <u>identify opportunities to invest in</u></p>	<p>Some points below replicate Highways England's comments on the Relevant Representation made by Truro Cycling Campaign at Deadline 1 in Annex G of the Comments on Relevant Representations (Document Reference 8.1) [REP1-004]. This is referred to where relevant.</p> <p>As stated in the Highways England response to the Truro Cycling Campaign's Relevant Representation:</p> <p>Paragraph 5.205 National Policy Statement for National Networks (NPSNN) states that “<i>applicants should consider reasonable opportunities to support other transport modes in developing infrastructure</i>”, while paragraph 3.18 states that “<i>The Government expects applicants to use reasonable endeavours to address the</i></p>

Reference	Interested Party	Written Representation	Highways England Response
		<p><u>infrastructure in locations where the national road network severs communities and acts as a barrier to cycling and walking, by correcting historic problems, retrofitting the latest solutions and ensuring that it is easy and safe for cyclists to use junctions'.</u></p> <p>The junction on the A30 at Chiverton Cross has been enlarged many times over the years to enable greater volumes of motor traffic, but has become a major barrier to cycling and walking, particularly between St.Agnes and Truro. The DCO only proposes improvements for motor traffic and fails to provide adequately for real-life cycle and walking movements.</p> <p>1.2 Paragraph 5.205 of the NPSNN states:</p> <p>'Applicants should consider reasonable opportunities to support other transport modes in developing infrastructure. As part of this, consistent with paragraph 3.19-3.22 above, the applicant should provide evidence that as part of the project they have used reasonable endeavours to address any existing severance issues that act as a barrier to non-motorised users.'</p> <p>Truro Cycling Campaign (TCC) contends that the proposals fail to provide for the needs of walkers and cyclists and indeed that the existing severance for non-motorised users will be made worse.</p>	<p><i>needs of cyclists and pedestrians in the design of new schemes”.</i></p> <p>Paragraph 3.18 also states the role of applicants in investing where the road network severs communities “<i>by correcting historic problems, retrofitting the latest solutions and ensuring that it is easy and safe for cyclists to use junctions.</i>”</p> <p>As shown on the Rights of Way and Access Plans (Document Reference 2.5(A-C)) [AS-022 to AS 030] most public rights of way which cross the existing A30 are being preserved or enhanced. Though there are four public rights of way (PROW) which are proposed to be stopped without a replacement, it is not considered that any of these would have any significant adverse effect on the PROW network.</p> <p>Paragraph 12.11.60 of Chapter 12 People and Communities of the Environmental Statement (Document 6.2) [APP-065] concludes that there is likely to be a long term and slight beneficial effect of the scheme for walkers, cyclists and horse-riders.</p> <p>The retention and enhancement of existing routes and the conclusion of Chapter 12 of the Environmental Statement demonstrate that the scheme is in accordance with section 9 NPPF and paragraph 5.205 of NPSNN. In addition, the delivery of the new route and underpass crossing as an investment for correcting a historic issue, by making Chiverton junction safe to use by cyclists, is considered to fulfil the aims of paragraph 3.17 of NPSNN.</p>

Reference	Interested Party	Written Representation	Highways England Response
		<p>1.3 Various other national and regional documents state that the Department for Transport, Highways England and Cornwall Council aim to support cycling as a means of transport, but this major road scheme is designed to meet the needs of motorised transport, and does not integrate the needs of non-motorised transport (other than protecting existing, historic rights of way), eg:</p> <ul style="list-style-type: none"> • DfT Cycling and Walking Investment Strategy 2017 – promoting better governance to ensure planning for cycling is incorporated into government programmes • Highways England Cycling Strategy 2016 – committing to ‘cycle-proofing’ the strategic road network, reducing severance and increasing the number of safe crossings. 	<p>Highways England have assessed the strategic need and latent demand for walking, cycling and horse-riding across the scheme, in accordance with all strategies and policies, and this includes ‘Cycling Strategy – our approach’, Interim Advice Note 195/16 – Cycle Traffic and the Strategic Road Network’ and HD 42/05 Non-motorised user Audits, Advice note 91/05.</p> <p>As stated at paragraph 4.2.2. of Chapter 4 Approach to the Environmental Impact Assessment of the Environmental Statement (Document Reference 6.2)[APP-057], all EIA work and environmental reporting on the scheme has been undertaken in accordance with guidance set out in DMRB and the relevant IANs.</p> <p>Chapter 12 People and Communities (Document Reference 6.2)[APP-065] of the Environmental Statement specifically references in Table 12-5 the Highways England Cycling Strategy as relevant legislation and policy.</p>
		<p>2. Failure to include the needs of cycling at Chiverton</p> <p>2.1 From the outset of the design process however, the proposals for Chiverton to Carland Cross have only included crossings where there are existing, historic rights of way. Some of these are country lanes with low flows, and TCC supports these crossings as improvements to overall accessibility.</p>	<p>Support from TCC for crossings that improve overall accessibility is noted.</p>

Reference	Interested Party	Written Representation	Highways England Response
		<p>2.2 However, the key route with potential for cycling is between the larger settlements of St.Agnes to Truro and so we contend that the omission of an adequate crossing at Chiverton is a material omission from the scheme. The Chiverton junction is so dangerous for walkers and cyclists at present that it is very rarely used by people with knowledge of the area, with the junction having one of the highest KSI rates in Cornwall, and the junction generally suppresses cycle activity in the area.</p>	<p>As stated in the Highways England response to the Truro Cycling Campaign's Relevant Representation:</p> <p>It is considered that the availability of a safe crossing for walkers, cyclists and horse riders at the location of the underpass is a benefit of the scheme compared to the existing situation as it also provides better links into the A3075 and the existing A30.</p> <p>The location and design of the crossing has been discussed and agreed with Cornwall Council, as is set out in reference 2.10 in Table 4.1 'Matters agreed' in the Statement of Common Ground with Cornwall Council (Document Reference 7.4(A)) [REP1-003].</p>
		<p>2.3 Apart from our members' experience, we know this from</p> <ul style="list-style-type: none"> the Cornwall Propensity to Cycle Study carried out in 2016 and showing the potential for much higher levels of cycling with provision of safe routes (Attachment 1). The map at http://pct.bike/m/?r=cornwall-and-isles-of-scilly shows at Lower Super Output Area the potential to raise cycle commuting from the census baseline of 2% of trips along the B3277/A390 (to Langarth) to a range of 9% to 12% under a Go Dutch scenario (with infrastructure) and, importantly for Cornwall, 18% to 23% with active support for E-bikes. <p>Evidence from the study was not used in the design of the proposal.</p> <ul style="list-style-type: none"> representations to the Inquiry from commuters from St.Agnes to Truro stating their desire to cycle or their long detours to avoid Chiverton 	<p>As stated in the Highways England response to Truro Cycling Campaign's Relevant Representation:</p> <p>Highways England have assessed the strategic need and latent demand for walking, cycling and horse-riding across the scheme, in accordance with all strategies and policies, and this includes 'Cycling Strategy – our approach', Interim Advice Note 195/16 – Cycle Traffic and the Strategic Road Network' and HD 42/05 Non-motorised user Audits, Advice note 91/05.</p> <p>As stated at paragraph 4.2.2. of Chapter 4 Approach to the Environmental Impact Assessment of the Environmental Statement (Document Reference 6.2)[APP-057], all EIA work and environmental reporting on the scheme has been undertaken in accordance with guidance set out in DMRB and the relevant IANs.</p> <p>Chapter 12 People and Communities (Document Reference 6.2)[APP-065] of the Environmental Statement specifically references in Table 12-5 the Highways</p>

Reference	Interested Party	Written Representation	Highways England Response
			<p>England Cycling Strategy as relevant legislation and policy.</p> <p>As outlined in page 57 of the Consultation Report (Document Reference 5.1) [APP-029] the following changes to the scheme were made for improved cycling provision at the Chiverton junction following statutory consultation, namely:</p> <ul style="list-style-type: none"> • a new off-carriageway connection between the realigned B3277 and the realigned A3075; • a new off-carriageway connection between the realigned A390 and the existing A30; and • a new underpass between the proposed roundabout at Chiverton Cross and the location of the existing roundabout, which connects the realigned B3277 with the realigned A390. <p>Whilst this is not what was specifically requested by Truro Cycling Campaign, these changes ensure that cyclists would be able to cross the new main A30 carriageway without having to negotiate the new Chiverton junction and also link into the A3075 and the existing A30.</p>
		<p>3. Inadequate alternative provision for walking and cycling at Chiverton</p> <p>3.1 Instead of a crossing, alternative provision for cycling is proposed in two places:</p> <ul style="list-style-type: none"> • A detour to Kea Downs – this uses an existing bridge over the A30 but necessitates cycling across an intimidating junction at Dangerous Crossings and along a fast, narrow road at Greenbottom. Very few cyclists feel safe enough to use this route and we believe it is not a safe or acceptable alternative. 	<p>As stated in the Highways England response to Truro Cycling Campaign's Relevant Representation:</p> <p>The surveys undertaken as part of the walking, cycling and horse riding survey and assessment in section 2.2 of the Public Rights of Way Management Plan in Annex M of the Outline CEMP Annexes (Document Reference 6.4) [APP-376] confirmed that a large majority of the cyclists travelling this route use the Blackwater Bridge, with extremely limited use on the Chiverton roundabout itself.</p>

Reference	Interested Party	Written Representation	Highways England Response
		<p>• An underpass east of the existing junction creating a 1km detour for cyclists. Judged against the criteria of TD 36/93 the underpass does not bring the functionality, fitness for purpose and good aesthetics called for in NPSNN paragraph 4.29. It is 70metres long by 4m wide and 2.7m high. It is a long underpass in an isolated location giving rise to personal safety concerns. It is of a minimum width, insufficient for segregation of user types. The low height means horses would have to be led, and thus as was acknowledged in TA 90/05 more difficult to control. This would endanger other users.</p> <p>3.2 Neither of these proposals provide a safe or convenient alternative. They may meet technical specifications to comply with the DCO process but providing long detours and unsafe environments will not address the real needs of non-motorised users and effectively the scheme reinforces severance.</p>	<p>As stated in the Highways England response to Truro Cycling Campaign's Relevant Representation:</p> <p>The journey distance between St Agnes and Truro is approximately 13km, with the proposed additional 1km diversion at Chiverton increasing this distance by approximately 7%. The increase in distance is also similar to the distance that cyclists currently experience when they use the Blackwater Bridge via East Hill.</p> <p>The underpass has been designed in accordance with national guidance, specifically:</p> <ul style="list-style-type: none"> • Design Manual for Roads and Bridges (DMRB) Interim Advice Note 195/16 – Cycle Traffic and the Strategic Road Network' • DMRB HD 42/05 has been superseded by 42/17 for Non-motorised user Audits. This was carried out and is referred to in section 2.2 of the Public Rights of Way Management Plan in Annex M of the Outline CEMP Annexes (Document Reference 6.4) [APP-376]. <p>The underpass has been designed as a straight continuous alignment with width and height dimensions greater than the minimum required standards for an unsegregated walking, cycling and horse riding route. These are specified in DMRB Interim Advice Note (IAN) 195/16 and TD36/93 and guidance from Sustrans and British Horse Society.</p> <p>IAN 195/16 states that minimum width should be 3 metres and minimum height should be 2.2 metres for cyclists and 2.7m for horses (if dismounted). The height of the proposed underpass is 2.7 metres and the proposed width is 4 metres.</p>

Reference	Interested Party	Written Representation	Highways England Response
		<p>4. No sound reason has been given for not providing a cycle bridge at Chiverton</p> <p>4.1 Highways England appear to accept the need for a cycle bridge at Chiverton by including it in a package of cycle improvements via Designated Funds. TCC strongly welcome this package but remains concerned that there is no guarantee that the bridge will be delivered and that provision of the bridge should be made a part of the DCO proposal.</p> <p>4.2 Various reasons have been given for not including the bridge as part of the DCO:</p> <ul style="list-style-type: none"> • Delay to the scheme – TCC does not object to the A30 improvement and do not wish to see the scheme delayed. TCC seeks either an amendment to the DCO within the red line, or a mechanism to guarantee delivery of the bridge. Our concern is that without some such guarantee, the Designated Funds could be cut or withdrawn and the route will remain severed for generations. 	<p>The underpass has short approach gradients from the road network of less than 1:20 and a continuous shallow gradient through the underpass from east to west. The underpass would have angled wingwalls to maximise the natural light at the entrances and would be lit with motion sensitive lighting. This would match the natural lighting outside of the underpass.</p> <p>As stated in the Highways England response to the Truro Cycling Campaign’s Relevant Representation:</p> <p>The scheme, including provision for WCH, has been designed in accordance with the Design Manual for Roads and Bridges (DMRB). In accordance with the requirements of the NPSNN, Highways England has developed a scheme that adequately addresses the needs of WCH, providing enhanced and safer crossing facilities when compared to the existing situation. This helps ensure that it is easy and safe for WCH to use the proposed junctions.</p> <p>Overall, it is considered that the availability of a safe crossing for walkers, cyclists and horse riders at the location of the underpass is a benefit of the scheme compared to the existing situation as it also provides better links into the A3075 and the existing A30.</p> <p>The location and design of the crossing has been discussed and agreed with Cornwall Council, as is set out in reference 2.10 in Table 4.1 ‘Matters agreed’ in the Statement of Common Ground with Cornwall Council (Document Reference 7.4(A))[REP1-003].</p>

Reference	Interested Party	Written Representation	Highways England Response
		<ul style="list-style-type: none"> • Cost – various other crossings are being provided along the improvement route as an integral part of the scheme and its budget. It is only this key route that has been left out. It would have been a relatively minor element in a substantial transport scheme if it had been included in the design from the outset and in response to the comments that were made from the local community throughout the process. Funding from Highways England is available from Designated Funds, but not as part of the road scheme. 	<p>There is limited demand for a crossing at Chiverton junction, as shown in the walking, cycling and horse riding survey and assessment in section 2.2 of the Public Rights of Way Management Plan in Annex M of the Outline CEMP Annexes (Document Reference 6.4) [APP-376]. As explained above, the proposed underpass at Chiverton junction and other measures were introduced following statutory consultation.</p>
		<ul style="list-style-type: none"> • Impacts on the World Heritage Site. No evidence has been provided that a cycle bridge would impact on the World Heritage Site, or that the impact of a cycle bridge would be greater than construction of a dual carriageway or from the existing, strongly-lit roundabout. There is no engine house or other mining structure whose setting would be impacted by a cycle bridge, and the nearest feature of potential interest is a series of meadows 200m away that may have been miners' fields, but these would not be harmed in any way by a cycle bridge. 	<p>The impact of a cycle bridge on the WHS has not been assessed as it is not part of the scheme. A key principle for the design of the scheme has been to protect the WHS by avoiding any works within its boundary or that would affect its outstanding universal value.</p> <p>Paragraph 6.11.82 of Chapter 6 Cultural Heritage of the Environmental Statement (Document Reference 6.2) [APP-059] states:</p> <p><i>“The scheme will remove the existing Chiverton roundabout and associated lighting, and an on/off slip road will replace it. The removal of existing lighting at the Chiverton roundabout would result in a slight beneficial impact on the significance of the WHS during the hours of darkness. Overall, the operational significance of effect of the scheme upon the WHS is considered to be Slight Beneficial.”</i></p>

Reference	Interested Party	Written Representation	Highways England Response
		<p>5 Conclusion</p> <p>5.1 Throughout the process, local people have raised concerns at the lack of a crossing for walking and cycling at Chiverton, but the proposal remained the same – no provision</p> <p>5.2 While many people we have spoken to remember cycling between Truro and St.Agnes when they were younger, very few people feel safe doing so now, and the proposal will sever the road network for cycling and walking for the next generations. Conversely, provision of a bridge would enable cycle movements, and unlock other opportunities to develop a safe route network in mid Cornwall. This is a once in a 100 years chance for mid-Cornwall and for us to tackle very low levels of active travel.</p> <p>5.3 A cycle bridge at Chiverton is being offered via Highways England’s Designated Funds, but we have no written assurances or design details, so reluctantly we have had to maintain our objection. TCC’s preference is that the bridge be built as an integral part of the scheme in order to ensure that it is designed and delivered at the same time as the road scheme to take advantage of the lowering of the road at that location. We also believe that this is the most efficient way to deliver the scheme in terms of public funding. However, if due to government processes the cycle bridge must be delivered as a separate transport project to the road scheme, then TCC seeks a guarantee that the bridge will be delivered within a short timescale of maximum 1 year from completion of the main road scheme to enable journeys by bike.</p>	<p>As stated in the Highways England response to the Truro Cycling Campaign’s Relevant Representation:</p> <p>The proposed underpass at Chiverton junction was introduced following the statutory consultation in response to the comments received from cyclists and other parties at that consultation.</p> <p>The scheme, including provision for WCH, has been designed in accordance with DMRB. In accordance with the requirements of the NPSNN, HE has developed a scheme that adequately addresses the needs of WCH, providing enhanced and safer crossing facilities when compared to the existing situation. This helps ensure that it is easy and safe for WCH to use the proposed junctions.</p> <p>Overall, it is considered that the availability of a safe crossing for walkers, cyclists and horse riders at the location of the underpass is a benefit of the scheme compared to the existing situation as it also provides better links into the A3075 and the existing A30.</p> <p>The location and design of the crossing has been discussed and agreed with Cornwall Council, as is set out in reference 2.10 in Table 4.1 ‘Matters agreed’ in the Statement of Common Ground with Cornwall Council (Document Reference 7.4(A))[REP1-003].</p> <p>Highways England have confirmed to Cornwall Council that they have approved Cycling, Safety and Integration Designated Funds to the sum of £17,075,250. This funding is for Cornwall Council to design and deliver a number of projects, including St Agnes to Threemilestone off carriageway cycle route, which would incorporate a bridge at the current location of Chiverton Cross roundabout.</p>

Reference	Interested Party	Written Representation	Highways England Response
REP1-033	Truro City Council	Truro City Council support the dualing of the A30 between Carland Cross and Chiverton Cross but do not support a tunnel under the A30 Chiverton Cross.	The support for the scheme is noted. All matters are covered in Highways England's detailed response to the Written Representation made by Truro Cycling Campaign [REP1-034] within this document.
REP1-009	Dan Williams	<p>From the Rule 6 letter under Annex B, 11 Transport and Traffic 'Effects on the Public Rights of Way (PRoW) network, particularly cycling access' (1) I would like to make the following points:</p> <ul style="list-style-type: none"> - I'm a hip and knee surgeon working at the Royal Cornwall and Duchy Hospitals and living in St Agnes, at the heart of the north coast community. I cycle to work 3-4 times per week all year round and continue to be surprised that more has not been done to ensure the north coast route into Truro has not been made more active / cycle friendly. - The benefits of cycling are laid out in the WHO 'GLOBAL ACTION PLAN ON PHYSICAL ACTIVITY 2018-2030' (2) where it is stated that "23% of adults and 81% of adolescents (aged 11–17 years) do not meet the WHO global recommendations on physical activity for health" (see attached). There is a duty is on all of us to promote active environments (Objective 2). <p>I believe this consultation represents an important opportunity; please let me know if you require further information.</p>	<p>As stated in the Highways England response to the Truro Cycling Campaign's Relevant Representation in Annex G of the Comments on Relevant Representations (Document Reference 8.1) [REP1-004] submitted at Deadline 1:</p> <p>Paragraph 5.205 National Policy Statement for National Networks (NPSNN) states that "<i>applicants should consider reasonable opportunities to support other transport modes in developing infrastructure</i>", while paragraph 3.18 states that "<i>The Government expects applicants to use reasonable endeavours to address the needs of cyclists and pedestrians in the design of new schemes</i>".</p> <p>Paragraph 3.18 also states the role of applicants in investing where the road network severs communities "<i>by correcting historic problems, retrofitting the latest solutions and ensuring that it is easy and safe for cyclists to use junctions.</i>"</p> <p>As shown on the Rights of Way and Access Plans (Document Reference 2.5(A-C)) [AS-022 to AS 030] most public rights of way which cross the existing A30 are being preserved or enhanced. Though there are four public rights of way (PROW) which are proposed to be stopped without a replacement, it is not considered that any of these would have any significant adverse effect on the PROW network.</p>

Reference	Interested Party	Written Representation	Highways England Response
			<p>Paragraph 12.11.60 of Chapter 12, People and Communities of the Environmental Statement (Document 6.2) [APP-065] concludes that there is likely to be a long term and slight beneficial effect of the scheme for walkers, cyclists and horse-riders.</p> <p>The retention and enhancement of existing routes and the conclusion of Chapter 12 of the Environmental Statement demonstrate that the scheme is in accordance with section 9 NPPF and paragraph 5.205 of NPSNN. In addition, the delivery of the new route and underpass crossing as an investment for correcting a historic issue, by making Chiverton junction safe to use by cyclists, is considered to fulfil the aims of paragraph 3.17 of NPSNN.</p>
REP1-008	Bernard Quigg	<p>I have grandsons and a daughter who live in St Agnes. The three grandsons can cycle to educational facilities on the northern edge of St Agnes. My daughter works in the local hospital from time to time and needs to travel as shifts fall to her. She runs. i They would be very unwise and probably too nervous to use the tunnel due to the risks from the kind of persons who will exploit the facility for illegal activities. The idea that any government would leave pedestrians etc no alternative except to cross a busy dual carriageway by providing such an unsuitable facility is immoral. I note that in Woking, Surrey where the traffic is much slower (30mph) it has been found necessary to provide light controlled crossings as well as a tunnel because so many people are scared to use the tunnel out of peak footfall times. At the Cornish location the traffic will move faster and the footfall is much lighter which seems to make a bridge the only sensible option.</p> <p>Bernard Quigg C Eng. FIET</p>	<p>As stated in the Highways England response to the Truro Cycling Campaign's Relevant Representation in Annex G of the Comments on Relevant Representations (Document Reference 8.1) [REP1-004] submitted at Deadline 1:</p> <p>The underpass has been designed in accordance with national guidance, specifically:</p> <ul style="list-style-type: none"> • Interim Advice Note 195/16 – Cycle Traffic and the Strategic Road Network' • HD 42/05 has been superseded by 42/17 for Non-motorised user Audits. This was carried out and is referred to in section 2.2 of the Public Rights of Way Management Plan in Annex M of the Outline CEMP Annexes (Document Reference 6.4) [APP-376] <p>The underpass has been designed as a straight continuous alignment with width and height dimensions greater than the minimum required standards. The exit would be visible on entering the underpass and there</p>

Reference	Interested Party	Written Representation	Highways England Response
			<p>would be very good visibility to, from and through the underpass.</p> <p>The underpass has short approach gradients from the road network of less than 1:20 and a continuous shallow gradient through the underpass from east to west. The underpass would have angled wingwalls to maximise the natural light at the entrances and would be lit with motion sensitive lighting. This would match the natural lighting outside of the underpass.</p>
REP1-024	Sarah Wetherill	<p>1. Introduction</p> <p>Over a prolonged period of this scheme Highways England have demonstrated a failure to gauge or acknowledge the suppressed demand for a direct safe cycle crossing on the B3277/A390 alignment. This has led to an unsatisfactory underpass in the main scheme designed primarily to enable the progress of their DCO application. Timely recognition of demand would have meant the inclusion of the best solution, a bridge at the present junction or 'Starbucks site', in the scheme presented for Public Consultation in early 2018.</p> <p>2. Local indicators</p> <p>Highways England should have considered the following factors from the outset and determined that this was a key route with potential to increase existing cycling rates:</p> <ul style="list-style-type: none"> • St.Agnes is a growing parish of 7000 population • on the A390 approach into Truro there are many prime commuter destinations including Royal Cornwall Hospital Treliske, Truro College, Richard Lander School, Threemilestone Business Park as well as the park and ride facility at Langarth. 	<p>All matters are covered in Highways England's detailed response to the Written Representation made by Truro Cycling Campaign [REP1-034] in this document.</p>

Reference	Interested Party	Written Representation	Highways England Response
		<ul style="list-style-type: none"> • The route via Chiverton is direct and for Cornwall relatively flat. • The distance between St. Agnes and this part of Truro is just over 6.5 miles and thus cycle commuting with its health and enviromental benefits would be an option for many. <p>3. Published data</p> <p>The above factors should have been considered in conjunction with the following to identify the latent demand for cycle trips:</p> <ul style="list-style-type: none"> • 2011 Census data showing over 1000 travel to work trips each day from the St Agnes area • Propensity to Cycle tool. This is an online resource initially funded by the Department for Transport (DfT) and designed to assist transport planners and policy makers to prioritise investments and interventions to promote cycling. The Cornwall case study (referred to elsewhere) shows the potential to significantly increase cycling rates along this route with Dutch levels of infrastructure and the availability of e-bikes <p>4. Highways England strategies and policies</p> <p>The strategic need for a direct and segregated cycle crossing should have been identified by Highways England when taking into account their following strategies and policies in their assessment process:</p> <p>4.1 Cycling Strategy – our approach: this promotes ‘ cycling facilities which are safe, separate from traffic and that enable users of all abilities to cycle, encouraging cycling as a sustainable form of transport.</p> <p>4.2 Interim Advice Note 195/16 - Cycle Traffic and the Strategic Road Network. This states at 2.1.2 that ‘current</p>	

Reference	Interested Party	Written Representation	Highways England Response
		<p>levels of demand for cycle trips are not always a good indication of potential future levels of demand. Creation of a comprehensive network of good quality cycle routes has the potential to stimulate demand beyond the incremental change that demand models predict. Designers shall not rely solely on modelled incremental increases relative to current demand for cycle trips, therefore they shall ensure they consider the potential for additional stimulated demand.'</p> <p>Importantly (on pages 30-33) paragraph 2.4.2 states that table 2.4.2 shall be used to determine the appropriate type of cycle crossing provision. This makes it clear that Highways England should have factored in a grade-separated crossing in the scheme from the outset. This would have enabled a high quality crossing (a bridge on the alignment) to have been designed in from day one.</p> <p>4.3 HD 42/05 Non-motorised user Audits. Even before the above IAN, this document from 2015 requires assessments to consider 'potential routes and desire lines not currently used, e.g. due to personal safety or road safety fears and to take into account desire lines and trip generators. This document was further updated in 2017 (HD 42/17) to reiterate the need to include 'a review of significant local trip generators and amenities in the area surrounding the highway scheme to identify likely desire lines for pedestrians, cyclists and equestrians'.</p> <p>4.4 Advice note 91/05 from as early as 2005 states that 'it is important to consider the range of potential users, key destinations and latent demand in determining the appropriate form of NMU [Non-Motorised User] provision'.</p> <p>5. Consultation responses</p>	

Reference	Interested Party	Written Representation	Highways England Response
		<p>5.1 Throughout the consultation process for the Scheme local people have made their views known on the desire for cycling improvements. This should have triggered a more thorough and early assessment of the need for a high quality cycle crossing at Chiverton allowing a proposal for a cycle bridge to be worked up at an early stage.</p> <p>See application document TR010026 - 5.2 Consultation report appendices part</p> <p>5.2 The Public Engagement Exercise of March to May 2015 gave an early indication of the general desire for improvement. Of 1301 respondents 58% said that they would be interested in an improved cycle network (para 1.3.5 of appendix A of TR10026). Graph 6.8 of Appendix A shows that to the question 'What is your main mode of transport?' 'cycle' came 2nd to 'motor vehicle' (77.5%) with 8.7%.</p> <p>5.3 In Appendix B of TR10026 - Report on Public Consultation (June 2017) paragraph 4.2.5 'St. Agnes – Truro connection at Chiverton Cross' states:</p> <p>'As with 4.2.2 above, since the proposed Chiverton Cross junction is to the north of the existing junction location, a number of comments requested an underpass or bridge near the existing junction location to cater for non-motorised user's (NMU) or vehicles travelling between St. Agnes and Truro. While the 1.2 km diversion through the new junction will benefit a vehicle when compared against the congestion at the junction during peak hours, and provide safer crossing points, cyclists and pedestrians perceive themselves to be disadvantaged by the proposals. Particularly those located around Chiverton</p>	

Reference	Interested Party	Written Representation	Highways England Response
		<p>and St. Agnes felt that more direct NMU facilities should be provided at the Chiverton Cross junction. A number of respondents suggested the alignment of the old Truro to St. Agnes route be used, incorporating an NMU underpass or overbridge to cross the dual carriageway.</p> <p>Kea Downs Road is an alternative route but is a similar distance from the existing junction location and does not have dedicated NMU facilities’.</p>	
REP1-017	John Wetherill	<p>1. Introduction</p> <p>The proposed underpass is a substandard crossing in three main respects:</p> <ul style="list-style-type: none"> • It is likely to raise concerns about personal security and thus not encourage use by non-motorised users. • It is unsuitable for joint use for Walking Cycling and Horseriding. • It involves a 1km extra long trip compared to bridge on the B3277/A390 alignment. <p>2. Why an underpass solution was chosen.</p> <p>2.1 Due to Highways England's failure to gauge suppressed demand and to follow their own pro cycling policies no segregated cycle crossing at Chiverton was in the scheme as presented for the Public Consultation between January and March 2018.</p> <p>2.2 This consultation subsequently showed that there was a high demand for one. Their reason for answering this demand with the proposed PR2 underpass, rather than a bridge at the present junction site, can be read on page 66 of the Consultation Report:</p> <p>" Highways England has considered providing a WCH link on the line of the existing Chiverton Roundabout. A link at this location would have landscape and visual impacts on</p>	All matters are covered in Highways England’s detailed response to the Written Representation made by Truro Cycling Campaign [REP1-034] in this document.

Reference	Interested Party	Written Representation	Highways England Response
		<p>the World Heritage Site to the south of the new A30. In addition, surveys of usage of the existing crossing at Chiverton by WCH have also shown that there is very little demand for it in this location. Given these issues and the cost of providing a new bridge in this location, Highways England cannot justify including the in this location as part of the DCO. The underpass proposed has been incorporated into the scheme without any significant environmental impacts, with minimal cost and in recognition of the perceived "suppressed demand" highlighted in feedback to the statutory consultation. "</p> <p>2.3 The choice of the underpass solution is not to provide the optimum crossing facilitating use at all times of year and day and by as wide range of users as possible. It does not reward and encourage cycling in line with the shown demand and national policy. It is down more to keeping the DCO process going, and fitting into the existing budget.</p> <p>2.4 Moreover these considerations have led to this particular underpass being in an especially isolated position, overly long and of minimum height and width.</p> <p>3. Underpass Likely To Raise Concerns About Personal Safety.</p> <p>3.1 .Generic Poor Perception of Underpasses.</p> <p>3.1.1 Underpasses in general raise issues of personal security or safety. This is recognised in many documents. These include Highway Englands 'TD 36/93 Subways for Pedestrians and Pedal Cyclists'. This, if not explicitly, seems to acknowledge that underpasses per se raise these concerns. It has a paragraph 2.5 entitled 'Personal Security Aspects' which I will quote from. Chapter 6 on construction includes this quote on interior tiling: 6.4 'Bold</p>	

Reference	Interested Party	Written Representation	Highways England Response
		<p>designs....can create an atmosphere that the subway is well used and therefore safer'. The chapter has various references to vandalism and graffiti.</p> <p>3.1.2 Also Highways England Advice Note 91/05 (6.56) notes that 'personal safety can be a significant issue in underpasses.</p> <p>3.1.3 Sustrans Design Manual from February 2015 refers to underbridges as likely to generate 'issues of personal security'</p> <p>4 Particular Shortcomings of Proposed Chiverton Underpass.</p> <p>4.1 The considerations of not delaying the DCO process or adding to the budget have led to this underpass being particularly unsuitable. It is to be situated under the embankment which will carry the A30 and two slip roads serving traffic using the new Chiverton junction to and from the West. This presumably saves on excavation costs but means that its indicative length is 70 metres long. TD 36/93 states ' The subway should be kept as short as possible' (2.2) (The fact that the length of 23m is often used in TD 36/93 as a threshold for different minimums leads me to gather that this is what is seen as denoting short.)</p> <p>4.2 Presumably, also to save on cost it is only 4m wide and only guaranteed to be 2.7m high. Already in a relatively unpopulated area it is further away from the few houses, 2 petrol stations, cafe and public house than a crossing at the present junction site would be. The entrances to the underpass would be some distance from the roads it connects. Judging from the map they would be about 20m from the B3277 and 50m from the A390. This will mean even more that the length of the subway</p>	

Reference	Interested Party	Written Representation	Highways England Response
		<p>will not be easily in the view of passing traffic which is seen as helping to minimize fears of personal safety in paragraph 2.5 of TD 36/93.</p> <p>4.3 I believe this underpass with its great length and narrowness and isolated position will be an especially intimidating underpass to use, especially for those commuting in the winter or later in the evening when they are more likely to be the only user. It certainly wouldn't fulfil the statement in Highways England Intermediary Advice Note 195/16 paragraph 2.2.1 that Cycle networks shall not only improve cyclists' and other road users' safety, but also their feeling of how safe the environment is. A large number of relevant representations can be seen to talk of this issue.</p> <p>5 The Proposed Underpass is unsuitable for joint use for Walking Cycling and Horseriding.</p> <p>5.1 The width of the proposed underpass is 4 metres. This is less than the 5 metres required to afford segregation of users, as according to HD 36/93 in chapter 4.3. Thus not only is it narrower than the ideal; it will have to be for unsegregated use.</p> <p>5.2 Chapter 4.7 states that 'Where the number of pedestrians and cyclists is small, an unsegregated subway may be acceptable, particularly for short subways with good through visibility.' This underpass is definitely not short. Also its relative narrowness may limit its usefulness in future years where factors such as housing development or increased cycling rates may require more width or segregation from other users. I suspect it would be more difficult to widen than a bridge crossing that could more simply be replaced if need be.</p>	

Reference	Interested Party	Written Representation	Highways England Response
		<p>5.3 The underpass only has a guaranteed height of 2.7m. HD 36/93 paragraph 4.10 states 'Where bridleways are to be incorporated into subways, the minimum headroom available should be 3.7m except where suitable facilities for the riders to dismount and remount are provided, when the headroom may be reduced to 2.7m. Thus horseriders would need to dismount to use the underpass.</p> <p>5.4 Highways England TA 90/05 'The Geometric Design of Pedestrian Cycle and Equestrian Routes' refers to the need to avoid low headrooms over longer distances since horses are more difficult to control when being led. Thus other users and the dismounted rider would be vulnerable, especially considering their closer proximity due to the narrowness of the underpass but it's long length. (moreover HD 90/05 gives a minimum headroom of 2.8m over 'longer distances')</p> <p>6 Less Direct Route</p> <p>The underpass incurs a 1km detour in comparison to the route on the direct B3277/A390 alignment. IAN 195/16 States ' Directness: Cycle networks shall serve all the main destinations and shall seek to offer an advantage in terms of distance and journey time. ' The longer journey time involved would reduce the number of people able to fit cycle commuting into their daily lives.</p>	

Appendix A: Highways England Response to Historic England Written Representation

Nick Russell
Inspector of Ancient Monuments
Historic England
29 Queen Square
Bristol
BS1 4ND

Your Ref:
PL00297372

Josh Hodder
Highways England
Temple Quay House
2 The Square, Temple Quay
Bristol, BS1 6HA

19 March 2019
Our Ref:
TR010026

Dear Nick,

Applicant's response to Historic England Written Representation

This letter provides Highways England's response to the Written Representation submitted by the Historic England in relation to the A30 Chiverton to Carland Cross scheme. Appended to this letter in Annex A is a detailed response to the points raised in your Written Representation.

The Highways England response to the Historic England Relevant Representation was issued on 1 February 2019. Following this, a meeting was held on 11 February 2019. A Statement of Common Ground was issued to Historic England on 19 February 2019.

It is considered that this Written Representation supersedes the Statement of Common Ground that was issued to Historic England on 19 February 2019, and a new Statement of Common Ground is being discussed with Historic England to reflect this.

Jessica Postance, the Environmental Lead for the project, will be in touch to discuss this response further.

Yours faithfully,



Josh Hodder
Project Manager
A30 Chiverton to Carland Cross

Enc.
Annex A – Applicant Response to Historic England Written Representation

Annex A: Applicant Response to Historic England Written Representation

Historic England Written Representation

Highways England Response

3. Scope of Written Representation

3.1. As stated in our Section 56 Relevant Representation, HBMCE’s interest in this scheme is focused upon the following designated heritage assets:

- a) The Carland Cross barrow cemetery, including; b, c, d, and e;
- b) Scheduled Monument Warren’s Barrow;
- c) Scheduled Monument Round barrow cemetery 420m north east of Higher Ennis Farm;
- d) Scheduled Monument Two bowl barrows 290m and 375m north of Higher Ennis Farm;
- e) Scheduled Monument Bowl barrow 500m north west of Higher Ennis Farm;
- f) Scheduled Monument Prehistoric long barrow and four round barrows 580m and 750m south west of Mitchell Farm;
- g) Scheduled Monument The Four Burrows;
- h) Scheduled Monument Bowl barrow 100m south west of Callestick Vean;
- i) Scheduled Monument Hillfort 250m south west of Tresawsen;
- j) Scheduled Monument Bowl barrow 130m south east of Penglaze;
- k) Scheduled Monument The Three Burrows;
- l) Scheduled Monument Prehistoric long barrow and four round barrows 580m and 750m south west of Mitchell Farm;

Highways England has no comments on this section, which is mainly factual description of designated heritage assets.

Historic England Written Representation	Highways England Response
<p>m) Cornwall and West Devon Mining Landscape World Heritage Site;</p> <p>n) Grade II Listed milestones at SW771486 and SW845539;</p> <p>o) Grade II Listed Church of St Peter at Chiverton;</p> <p>p) Grade I Listed building, Trerice.</p> <p>The relevant entries on the National Heritage List for England for these designated heritage assets are set out in Appendix A.</p>	
<p>3.2. We will describe below how the proposals physically interact with the monuments, their significance, and the impact of the scheme upon the monuments. We will address each monument individually in a narrative discussion; however, to avoid repetition in the case of barrows and the wider barrow cemetery at Carland Cross we will include a separate consideration of both significance and impact.</p>	
<p>3.3. The scope of HBMCE’s written representation will include:</p> <ul style="list-style-type: none"> • a summary of the proposals; • an outline of HBMCE’s consultation and advice on the proposals to date; • an update on the current production of the Statement of Common Ground; • a brief description of the designated heritage assets affected (as noted above) and an assessment of their significance (including that contribution made by their settings) and our assessment of the impact of the Scheme; 	

Historic England Written Representation	Highways England Response
<ul style="list-style-type: none"> • HBMCE’s comments and observations on the Environmental Statement (ES), including our advice regarding the likely effectiveness and suitability of the proposed mitigation measures; • HBMCE’s comments and observations on the draft DCO. 	
<p><i>4. The Proposals and HBMCE’s Involvement with the Scheme</i></p>	
<p>4.1. HBMCE Consultation and Advice to Date</p> <p>4.1.1. HBMCE expect a summary of the consultation undertaken between HBMCE and the Applicant will be set out in the Statement of Common Ground (SoCG), which remains in discussion between the parties.</p>	<p>Highways England considers this is an accurate reflection of the consultation to date. This will be detailed in the Statement of Common Ground with Historic England to be submitted at Deadline 3.</p>
<p>4.1.2. HBMCE was approached by Highways England (the Applicant) in early 2015, and we understood at that time that they proposed to dual a section of the A30 between Chiverton and Carland Cross. The exact details of the route, the design, and matters relating to construction compounds, extent of impact on the historic environment and proposed mitigation were at that point the subject of consultation through a series of Value Management Workshops and following this process our first response was provided on 22nd January 2016 in response to the request for a Scoping Opinion.</p> <p>We provided further advice on the Scoping of the EIA on the 8th September 2017 and on the 26th March 2018 we responded to the proposed route selection, registering our concerns, in particular with reference to the Carland Cross scheduled barrows.</p>	
<p>4.1.3. At that time, it was understood that the Scheme would impact on the above named scheduled monuments and would result in significant monuments identified above, and advised they had potential to cause harm to the significance of these designated heritage assets.</p>	

Historic England Written Representation	Highways England Response
4.1.11. Consultation has subsequently continued through a series of meetings with Highways England and their consultants.	
4.1.12. In November 2018, HBMCE provided written representations to the Planning Inspectorate as part of the pre-examination process.	
4.1.13. On 27th September 2018 we understand that the application for a Development Consent Order for the proposed dualling of the A30 between Chiverton and Carland Cross was accepted for examination by the Planning Inspectorate.	
5. <i>Statement of Common Ground (SOCG)</i>	
5.1. Discussion with the Applicant regarding the draft Statement of Common Ground (SoCG) continues at the time of submission of this Written Representation. An initial meeting was conducted on 11th March 2018 and HBMCE have, today, received a draft SoCG. We will now be reviewing its content. We understand additional photomontages are being produced to address our comments in relation to The Church of St Peter and the scheduled round barrow cemetery at Carland Cross. These will add clarity on the extent of impact on the significance of the listed church and the extent to which the impact upon the barrow cemetery at Carland Cross can be minimised. This will aid in identifying how optimal, appropriate mitigation will be secured. HBMCE considers that all of these items are required to inform its, and the Examining Authority's, assessment of the impact of the Scheme.	5.1 This meeting took place on 11th February 2019, and additional assessment is being undertaken. Photomontage locations are being selected for agreement with HBMCE. This will be covered in the Statement of Common Ground to be submitted at Deadline 3. It is important to note that the asset was assessed in paragraph 6.11.83 of Chapter 6 Cultural Heritage of the Environmental Statement (Document Reference 6.2) [APP-059] which states: <i>“From the ridge at Four Barrows, the Chyverton Junction would be visible, and detract from that aspect of the significance of the church which is derived from being a focal point in the landscape. On this basis the operational significance of effect of the scheme upon the listed buildings is considered to be Slight Adverse.”</i>

Historic England Written Representation	Highways England Response
	The requested photomontages are being provided to add clarity.
<i>6. Assessment of Significance and Impact on Designated Heritage Assets Affected by the Scheme</i>	
<p>6.1. Statement of Approach</p> <p>6.1.1. Under this section HBMCE sets out the significance of, and its assessment of the impact on the designated heritage assets affected by the Scheme. We environmental impacts to the Carland Cross barrow group consisting of the three scheduled will address each individual asset in turn, however, their cumulative significance and the relationships between individual schedulings are such that we will take a more holistic overview of the significance of the barrows and of each barrow cemetery as a whole.</p>	<p>6.1.1 Highways England notes HBMCE Statement of Approach.</p>
<p>6.2. The Carland Cross round barrow cemetery as a whole.</p> <p>6.2.1. The barrows at Carland Cross form part of a more extensive barrow cemetery. This includes the following scheduled monuments: Warren’s Barrow; round barrow cemetery 420m north east of Higher Ennis Farm; two bowl barrows 290m and 375m north of Higher Ennis Farm; and prehistoric long barrow and four round barrows 580m and 750m south west of Mitchell Farm. It also includes non-designated barrows and further scheduled barrow groups to the south east. It is likely that the cemetery was once more extensive and incorporated a number of barrows that have been destroyed through cultivation or development, including the existing A30.</p> <p>Often occupying prominent locations, barrows are a major historic element in the modern landscape and their considerable variation of form and longevity as a monument type provide important information on the diversity of beliefs and social organisations amongst early prehistoric communities.</p>	<p>6.2.1 Highways England agrees that the barrows at Carland Cross form part of a wider grouping of barrows that were built over a period of approximately 2000 years, and which represent an important resource for theorising on the social infrastructure and funerary practices of prehistoric societies.</p>

Historic England Written Representation	Highways England Response
<p>The significance of the asset.</p> <p>6.2.2. Location is highly significant for barrows, with most examples being situated on, or just off the crests of hill, ridges and rises, being visible from large distances. Evidence from archaeological excavation of other barrows indicates that this visibility would often have been enhanced by keeping the barrows stripped of cover so as to stand out from their surroundings.</p> <p>6.2.3. The deliberate location of barrows created connections and established relationships between individual barrows and other round barrows as well as connecting significant places in the landscape both near and far. “It was the relationships between the barrows and in turn their relationships with their landscape settings that empowered people to identify with the landscape as a whole rather than just to specific places (individual barrow locations) within it.” Interpreting Landscapes: Geologies, Topographies, Identities: Explorations in Landscape Phenomenology 3 (C Tilley 2010).</p>	<p>6.2.2 Highways England agrees that location appears to have been highly significant for barrows, and that their treatment in prehistory may have enhanced their visibility.</p> <p>6.2.3 While it is clear that visibility over and within the landscape was a key attribute of many barrows’ locations, as with all prehistoric archaeology, no-one knows the actual intent of the builders, or the beliefs that may or may not have formed the basis for their societies.</p> <p>There is a broad spectrum of academic theory on the role of pre-historic funerary monuments of which Professor Tilley is one, however there can be no certainty as to what these monuments meant to their builders. Therefore, whilst Highways England does not disagree with HBMCE regarding this point, it cannot be proved.</p> <p>That notwithstanding, visual prominence and location of barrows is recognised as an important aspect of the significance of these assets.</p>
<p>6.2.4. In terms described in Conservation Principles (English Heritage 2008), barrows derive ‘evidential’ significance from their physical remains and the potential they have to inform us of their construction, use and social and religious beliefs. They also derive significance from their illustrative ‘historical’ value, the power to aid interpretation of the past through making connections with, and providing insights into, past communities and their activities through shared experience of place. In the case of barrows their prominent locations and commanding outlooks provide an instant visual understanding of the importance of place to the monuments’ location. Barrows also derive significance from their ‘aesthetic’ value, both of form and situation. In the case of barrows their conscious placement in their</p>	<p>6.2.4 As stated in paragraph 6.3.27 of Chapter 6 Cultural Heritage of the Environmental Statement (Document Reference 6.2) [APP-059], Highways England agree with this interpretation of the Conservation Principles with regard to barrows.</p>

Historic England Written Representation	Highways England Response
<p>landscape is central to their significance and again assists in the understanding of the importance of place to former communities.</p>	
<p>6.2.5. Warren’s Barrow and the round barrow cemetery 420m north east of Higher Ennis Farm also derive significance through their ‘associative’ historical value respectively as the supposed burial place of a certain General Warren, and through the preservation of the memory of the former Killigrew Estate, through the naming of Killigrew Barrow in the north of the cemetery.</p>	<p>6.2.5 Highways England agrees that these associations make some contribution to the significance of the barrows, but consider that this contribution is marginal in comparison to the overarching components of significance described in 6.2.4 of HBMCE’s Written Representation.</p>
<p>HBMCE’s assessment of impact on the asset.</p> <p>6.2.6. The cumulative impact on the barrow cemetery as a whole, including the two bowl barrows 290m and 375m north of Higher Ennis Farm; the round barrow cemetery 420m north east of Higher Ennis Farm; and Warrens Barrow has the potential to result in harm. The provision of further information in the form of a requested additional visualisation would provide greater clarification on the degree of impact. The importance of Warren’s Barrow as the best surviving element of the cemetery must be considered in any assessment of the wider barrow cemetery. The loss of spatial references arising from the removal of its primary outlook, as the result of the relocated A30 main carriageway passing adjacent to the barrow on an elevated section, has the potential to result in harm to the significance of the monuments.</p> <p>6.2.7 The location of round barrows, whether individual or as part of a group, contributes greatly to their significance and the ability to ‘read’ their relationship with their setting is especially vulnerable to visual intrusions, this is greatly increased where that intrusion includes noise, movement, or odour.</p>	<p>6.2.6 Highways England has concluded that there is no viable solution for substantial reduction in impact to the setting of Warren’s Barrow, however, we will continue to explore this issue further at detailed design. A 0.5m change in vertical alignment is within the limits of deviation for the scheme, however it is not considered that lowering the scheme by 0.5m would make any discernible difference.</p> <p>Following the meeting between HBMCE and Highways England on 11 February 2019, it was agreed that a photomontage of the scheme from the barrow cemetery will be provided to HBMCE during the Examination. This is being prepared for discussion with HBMCE.</p> <p>6.2.7 Highways England agrees that modern intrusion within the setting of the barrows has the potential to affect the significance of these monuments. This is set out in section 6.11 Assessment of Effects in Chapter 6 Cultural Heritage of the Environmental Statement (Document Reference 6.2) [APP-059].</p>

Historic England Written Representation	Highways England Response
<p>6.2.8 Distant views are an essential factor in the location of barrows such that the loss of such visibility will result in loss of significance derived from this aspect of the barrow’s setting. Barrows were intentionally located to both integrate into and, to confirm the, often significant ritual and social landscapes which they defined. A significant factor in their location was the ability to see and be seen. Barrows often have commanding views across specific landscapes, in this case Newlyn Downs, and these views were central to their importance. This loss of significance must be appropriately appreciated and should not be underestimated.</p> <p>6.2.9. The rerouting of the line of the A30 will allow the previously separated elements of the wider barrow cemetery to be reconnected, allowing the cemetery to be experienced without the disconnection of the major barrow of the group by the existing A30.</p>	<p>6.2.8. This is agreed as a general principle, however several barrows in the Carland Cross group are located on the east south east slope, which suggests that Newlyn Downs was not the specific intended view for these barrows. Therefore, Highways England is satisfied that the description of setting and how it contributes to significance described in Chapter 6 Cultural Heritage of the Environmental Statement (Document Reference 6.2) [APP-059]; paragraphs 6.11.62 to 6.11.65 and 6.11.70 to 6.11.74 of the Chapter provide a realistic description of the impact of the proposed scheme.</p> <p>6.2.9 Highways England agree that the re-routing of the A30 would allow the link between Warrens Barrow and the round barrow cemetery 420m north east of Higher Ennis Farm to be re-established and appreciated. Paragraph 6.10.3 of Chapter 6 Cultural Heritage of the Environmental Statement (Document Reference 6.2) [APP-059] states:</p> <p><i>“Following a request from Historic England, the existing A30 will be removed from its current location at Carland Cross, to enable a group of scheduled round barrows to be reunited with Warrens Barrow, which is currently isolated to the north of the existing A30.”</i></p>
<p>6.3. The scheduled monument Warren’s Barrow (SM 29681; NHLE 1016888).</p> <p>6.3.1. HBMCE’s main concern relating to impacts of the Scheme upon designated heritage assets is regarding the loss of experience of the setting and loss of visibility of the surrounding landscape in views to and from the scheduled monument, Warren’s Barrow (SM 29681; NHLE 1016888). This is the result of the relocated A30 main carriageway passing adjacent to the barrow on an elevated section.</p>	<p>6.3.1 Highways England notes HBMCE’s concern as detailed below.</p>
<p>The significance of the asset.</p>	<p>6.3.2 – 6.3.5 Highways England agrees with the significance ascribed to the asset by HBMCE and this is reflected in the High Value rating reported in</p>

Historic England Written Representation

Highways England Response

6.3.2. The scheduled monument Warren’s Barrow is a bell barrow, the most visually impressive form of round barrow, and is a funerary monument dating to the Early and Middle Bronze Age, belonging to the period 1500-1100 BC. Bell barrows occur either in isolation or, as at Carland Cross, in round barrow cemeteries and were constructed as single or multiple mounds covering burials, often in pits, and surrounded by an enclosure ditch. The burials are frequently accompanied by weapons, personal ornaments and pottery and appear to be those of aristocratic individuals, usually men.

6.3.3. Warren's Barrow is situated on the tip of a south facing hill slope at the eastern edge of Newlyn Downs. It represents the most northerly of a group of barrows at Carland Cross which together formed a round barrow cemetery. The rest of the barrows in this group are the subject of separate designations (see 6.4; 6.5; 6.6; and 6.7). The barrow has a stepped appearance, surrounded on all sides by a lower and flatter berm. The total diameter of the barrow mound is 36m and it has a maximum height of 3.6m. Other barrows in the vicinity are known to have been accompanied by a surrounding ditch from which material was quarried for their construction. Whilst Warren's Barrow has no such visible surrounding feature at ground level, its approximately 2m wide ditch is likely to survive below ground, the infilling of the ditch by natural processes over the course of many centuries masking it from present view. The unusual shape of the barrow is consistent with the bell barrow form. The monument has become known locally as Warren's Barrow after a certain General Warren who was reputedly buried there.

6.3.4. Bell barrows are one of the rarest forms of barrow nationally, particularly outside Wessex where most survive. Their richness in terms of grave goods provides evidence for chronological and cultural links amongst early prehistoric communities over most of southern and eastern England as well as providing an insight into their beliefs and social organisation. Warren's Barrow survives well and will retain archaeological evidence relating to the monument and the landscape in which it was built. Together

Table A-6 of Appendix A in **Appendix 6.2 Historic Environment Desk-Based Assessment** of the Environmental Statement (Document Reference 6.4) [APP-321].

Historic England Written Representation	Highways England Response
<p>with a group of bell and bowl barrows to its south, Warren's Barrow forms part of a small round barrow cemetery and will retain archaeological and environmental evidence relating to the monument and the landscape in which it was built.</p> <p>6.3.5. The bell barrow known as Warren's barrow derives great significance from its prominent position overlooking Newlyn Downs. As the primary barrow in the group this contributes greatly to its significance.</p>	
<p>HBMCE's Assessment of Impact on the asset.</p> <p>6.3.6. The scheme will result in Warren's Barrow being bounded to the north by an embankment carrying the new slip road accessing the new main carriageway of the A30. This embankment extends to the west until it transitions into a cutting.</p> <p>6.3.7. This proposed embankment will result in the total loss of views out from, or to, the north east over Newlyn Downs. As the major barrow in the Carland Cross group this view is significant, not just to Warren's Barrow but to the cemetery as a whole.</p>	<p>6.3.6 – 6.3.7 Highways England agrees that the proposed embankment would result in the total loss of views out from, or to, the north east over Newlyn Downs, as stated in paragraph 6.11.73 of Chapter 6 Cultural Heritage of the Environmental Statement (Document Reference 6.2) [APP-059], and that this view is also significant to the round barrow cemetery 420m north east of Higher Ennis Farm, as stated in paragraph 6.11.64 of the Chapter.</p>
<p>6.3.8. The loss of views from, and to, Warren's Barrow across Newlyn Downs will lessen the ability to experience the asset in its setting and understand the reason for its location.</p> <p>6.3.9. HBMCE considers the level of harm to Warren's Barrow to be at a high level of less than substantial. We would also note that the loss of views from Warren's Barrow will raise the level of harm to the round barrow cemetery 420m north east of Higher Ennis Farm as discussed below.</p>	<p>6.3.8 – 6.3.9 As described in Highways England's response to 6.2.8, the location of the round barrow cemetery 420m north east of Higher Ennis Farm on the east south east slope of the hill suggests that the intended view from these barrows was southwards, and not northwards towards Warren's Barrow. Therefore, an adverse effect at Warren's Barrow would not lead to an equal adverse effect on the round barrow cemetery 420m north east of Higher Ennis Farm paragraph, as stated in paragraph 6.11.64 of Chapter 6 Cultural Heritage of the Environmental Statement (Document Reference 6.2) [APP-059].</p>

Historic England Written Representation	Highways England Response
<p>6.3.10. The removal of the existing A30 at this location will allow reconnection of Warren’s Barrow with the wider barrow cemetery of which it is a major element. This reconnection combined with the improved public access and potential for on-site interpretation and a dedicated viewing area that have been recommended by HBMCE may be considered to provide a worthwhile environmental benefit.</p>	<p>6.3.10 During the meeting between HBMCE and Highways England on 11th February 2019, it was agreed that the inclusion of a viewing area at the northernmost barrow of NHLE 1017050 would in-part ameliorate the loss of views to the north from Warrens Barrow, and from the round barrow cemetery 420m north east of Higher Ennis Farm. The detail of this viewing area will form part of ongoing discussions and will likely result in Sheet 18 of Figure 7.6 Environmental Masterplans (Document Reference 6.3) [APP-198] for this area being updated in liaison with HBMCE. This will be detailed in the Statement of Common Ground with Historic England.</p>
<p>6.4. The scheduled monument round barrow cemetery 420m north east of Higher Ennis Farm (SM 32903; NHLE 1020758).</p> <p>6.4.1. The scheduled Monument Round barrow cemetery 420m north east of Higher Ennis Farm (SM 32903; NHLE 1020758), is located just outside the red line boundary. However, the elevated section of the re-routed main carriageway of the A30 will impact upon the contribution made to the significance of this monument by its setting. The monument will benefit from the removal of the existing A30 and re-connection with Warrens Barrow scheduled barrow to the north of the existing A30. The reconnection of these two elements of the wider barrow cemetery will allow the monument to be experienced without the disconnection of the major barrow of the group by the existing A30.</p>	<p>6.4.1 – 6.4.4 Highways England agrees with this description of the monument and the effects of the proposed scheme, as described in paragraph 6.11.64 of Chapter 6 Cultural Heritage of the Environmental Statement (Document Reference 6.2) [APP-059].</p>
<p>6.4.2. The scheduled monument 420m north east of Higher Ennis Farm is a round barrow cemetery dating to the Bronze Age (c.2000-700 BC). Round barrow cemeteries comprise closely-spaced groups of up to 30 round barrows - rubble or earthen mounds covering single or multiple burials. Most developed over a considerable period of time, often many centuries, and in some cases acted as a focus for burials as late as the early medieval period. They exhibit considerable diversity of burial rite, plan and form, frequently</p>	

Historic England Written Representation

Highways England Response

including several different types of round barrow, occasionally associated with earlier long barrows.

6.4.3. The barrow cemetery 420m north east of Higher Ennis Farm survives well, the barrows showing clearly their differing forms. The mounds remain substantially intact and some have remains of a stone kerb and/or a ditch around them. The old land surface beneath the mounds and original buried deposits associated with them will also survive.

6.4.4. The monument includes a round barrow cemetery containing five barrows of bowl, bell and platform type, situated on the ESE shoulder of a ridge south west of Carland Cross. They are closely associated with four other barrows, which form outliers to the cemetery and are the subject of separate scheduling's. The five barrows are fairly closely and evenly spaced, with three aligned across the gentle slope of the land and are contained in four separate areas of protection. The two barrows on the south side of the group are aligned north west-south east. To the north, the scheduling includes a prominent bell barrow, known as Killigrew Barrow after the estate on which it lay. Quartz blocks around its base are considered to be part of a kerb of stones set in the perimeter of the mound. The western barrow in the scheduling is aligned with the southern pair and was described as probably a broad or platform barrow in 1898.

6.4.5. The barrow cemetery 420m north east of Higher Ennis Farm enjoys prominent views to the north and east across Newlyn Downs and would have been highly prominent in its landscape.

6.4.6. Occupying a prominent location, the barrows are a major historic element in the modern landscape, the diversity of form exhibited in the cemetery demonstrates the variety of beliefs and social organisation amongst early prehistoric communities. They are particularly representative of their period and the ridge-top location of the cemetery and the alignment of three of the barrows within it, together with the varying forms of the

6.4.5 The barrow cemetery 420m north east of Higher Ennis Farm is located off the crest of the hill on the east south east slope, which suggests that Newlyn Downs was not the specific intended view for these barrows, though it would clearly have been a component in the setting of the barrows.

6.4.6 Barrows are a major prehistoric element in the modern landscape. The barrows at Carland Cross form part of a wider grouping of barrows that were built over a period of approximately 2000 years, and which represent an

Historic England Written Representation	Highways England Response
<p>barrows in this scheduling and the other closely associated barrows beyond it, illustrate well the important role of topography and the diversity of practices within Bronze Age funerary activity.</p> <p>6.4.7. Their location is highly significant for these barrows, with the cemetery being situated on and just off the crest of the ridge upon which the existing historic A30 route follows, being visible from large distances. Evidence from archaeological excavation of other barrows indicates that this visibility would often have been enhanced by keeping the barrows stripped of cover so as to stand out from their surroundings. The barrow cemetery 420m north east of Higher Ennis Farm enjoys prominent views to the north and east across Newlyn Downs and would have been highly prominent in its landscape.</p>	<p>important resource for theorising on the social infrastructure and funerary practices of prehistoric societies.</p> <p>6.4.7. As per the response provided at point 6.4.5, Highways England agree that the barrows would have been highly prominent, but do not consider that views to Newlyn Downs were necessarily the primary intended views from these barrows.</p>
<p>HBMCE's Assessment of Impact on the asset.</p> <p>6.4.8. The scheme will provide benefits to the significance of the monument through the removal of the existing A30 allowing Warren's Barrow to be experienced again as part of the barrow cemetery of which it is a major element. However, the engineering solution being proposed will result in an, as yet, unspecified degree of loss of the commanding views across Newlyn Downs to the north east. Once final engineering levels are agreed and an additional photomontage supplied it will be possible to determine where the cutting transitions to an embankment and thus the level of harm.</p> <p>6.4.9. HBMCE awaits submission of a photomontage demonstrating the visual impact during construction and operation of the Scheme which is needed to assess the nature and extent of this impact on the significance of the scheduled monument. In HBMCE's view it is not yet possible to provide a final assessment of the combined effects of the impact of the Scheme since there is outstanding information required to complete that assessment as detailed above.</p>	<p>6.4.8 and 6.4.9 As stated in response to 5.1 above, a photomontage will be provided for HBMCE's information, and Highways England expect this to corroborate the assessment of the scheme at paragraph 6.11.64 of Chapter 6 Cultural Heritage of the Environmental Statement (Document Reference 6.2) [APP-059].</p> <p>6.4.10 Highways England considers that the reuniting of Warren's Barrow with the barrow cemetery 420m north east of Higher Ennis Farm, and moving traffic northwards away from the barrows, would be a beneficial effect that would outweigh change to the view to the north as a result of the proposed scheme (paragraph 6.11.64 of the aforementioned Chapter).</p>

Historic England Written Representation	Highways England Response
<p>6.4.10. The cumulative impact on the barrow cemetery as a whole, including the two bowl barrows 290m and 375m north of Higher Ennis Farm; the round barrow cemetery 420m north east of Higher Ennis Farm; and Warrens Barrow has the potential to result in harm. The provision of further information to assist in the understanding is necessary to understand the degree of impact or harm on the significance of the designated heritage assets. The importance of Warren’s Barrow as the best surviving element of the cemetery must be considered in any assessment of the wider barrow cemetery.</p>	
<p>6.5. The Scheduled Monument Two bowl barrows 290m and 375m north of Higher Ennis Farm (SM 32902; NHLE 1017050).</p> <p>6.5.1. There will be impacts to the contribution made by its setting to the significance of the northernmost barrow of the scheduled monument two bowl barrows 290m and 375m north of Higher Ennis Farm (SM 32902; NHLE 1017050). The close proximity of the re-positioned A30 main carriageway at this point will result in the barrow being bounded to the north by a 15 degree retaining slope to the carriageway below. HBMCE has recommended a programme of works intended to provide a degree of environmental benefit to the significance of this and the other scheduled barrows at Carland Cross.</p>	<p>6.5.1. Highways England agrees that the northernmost of the two barrows would experience a change to aspects of its setting that contribute to its significance. Highways England agree with the principle of a programme of environmental works to benefit the barrows, and will continue to engage with HBMCE to achieve a satisfactory outcome (see response to 6.3.10, above).</p> <p>Requirement 9 of the draft DCO (Document Reference 3.1(C)) secures a scheme for the investigation and mitigation of areas of archaeological interest, reflecting the mitigation measures included in Chapter 6 Cultural Heritage of the Environmental Statement (Document Reference 6.2) [APP-059]. This is required prior to the commencement of development.</p>
<p>The significance of the asset.</p> <p>6.5.2. Despite their separate designation the two bowl barrows 290m and 375m north of Higher Ennis Farm should be considered as part of the extensive Carland Cross barrow cemetery.</p> <p>6.5.3. The two barrows themselves are bowl barrows, funerary monuments dating from the Late Neolithic period to the Late Bronze Age, with most examples belonging to the period 2400-1500 BC. They were constructed as</p>	<p>6.5.2. Due to the asset’s specific location in relation to the proposed scheme, the barrows are considered individually in paragraphs 6.11.57 to 6.11.60 of Chapter 6 Cultural Heritage of the Environmental Statement (Document Reference 6.2) [APP-059], However Highways England agrees that the barrows form part of the overall Carland Cross group of barrows.</p> <p>6.5.3 Highways England notes HBMCE’s description of the asset.</p>

Historic England Written Representation	Highways England Response
<p>earthen or rubble mounds, sometimes ditched, which covered single or multiple burials. They occur either in isolation or, as at the Four Burrows and the Carland Cross barrows, grouped as cemeteries, often acting as a focus for burials in later periods. They are particularly representative of their period and will retain many of their original features providing information about these monument and the landscape in which they were built.</p> <p>6.5.4. The two barrows ridge-top location close to a cemetery containing different barrow forms illustrates well the important role of topography and the diversity of practices within Bronze Age funerary activity. HBMCE's Assessment of Impact on the asset.</p> <p>6.5.5. The impact considered here is focused on the northernmost barrow of the scheduling as in closest proximity to the A30.</p> <p>6.5.6. The monument sits, at present in a scrubbed up area adjacent to the existing A30. The Scheme will see the existing A30 re-routed to the north and the new main carriageway occupying the former A30. This new carriageway will be in a cutting and will necessitate a soil nailed 15 degree stabilisation slope coming to within five metres of the monument.</p>	<p>6.5.5 Highways England agrees that the impact is focused on the northernmost barrow of the scheduling.</p> <p>6.5.6 Highways England agrees with HBMCE's understanding of how the scheme interacts with the asset.</p>
<p>6.5.7. The Scheme will result in the outlook from this barrow being a view immediately across the new carriageway of the A30 in a cutting immediately below the barrow. Although there will be a greater visual impact than the current A30, which is also adjacent, the lower level will help to offset the increased width and HBMCE consider the harm to the significance of this barrow from the new Scheme to be towards the middle of the less than substantial range.</p>	<p>6.5.7 Highways England agrees with HBMCE's assessment. This is documented in paragraph 6.11.87 of Chapter 6 Cultural Heritage of the Environmental Statement (Document Reference 6.2) [APP-059].</p>
<p>6.5.8. As part of the SoCG discussions between HBMCE and Highways England the potential for environmental gain for the whole of the Carland</p>	<p>6.5.8 Highways England agrees with the potential for environmental gain, as per response 6.5.1 above. At the meeting on 11 February 2019, it was</p>

Historic England Written Representation	Highways England Response
<p>Cross barrow cemetery affected by the loss of spatial references arising from the removal of its primary outlook is being considered. This consideration encompasses the provision of viewpoints, access, and interpretation. We have recommended that a viewpoint be established at the northernmost barrow, which will allow visitors accessing the cemetery via the new access afforded by the removal of the existing A30 to look out over Newlyn Downs and appreciate the outlook that was so important in their placement. This access point should include on-site interpretation as part of a wider interpretation strategy incorporating the wider barrow cemetery and supported by publication of the results of investigations undertaken as part of the scheme incorporating historical research to tell the story of this historic route.</p>	<p>discussed that the implementation of a viewing area at the northernmost barrow of NHLE 1017050 and the inclusion of access and interpretation would in-part ameliorate the loss of views to the north. This will form part of ongoing discussions and will likely result in Sheet 18 of Figure 7.6 Environmental Masterplans of the Environmental Statement (Document Reference 6.3) [APP-198] being updated in liaison with HBMCE. This will be detailed in the Statement of Common Ground with Historic England.</p>
<p>6.6. The scheduled monument bowl barrow 500m north west of Higher Ennis Farm (SM 32901; NHLE 1017049).</p> <p>6.6.1. The scheduled monument bowl barrow 500m north west of Higher Ennis Farm (SM 32901; NHLE 1017049), abuts the northern edge of the existing A30. It is proposed that the new carriageway pass to the south of this. HBMCE concurs with the findings of the ES and consider the level of harm to be in the low to middle on the less than substantial range.</p>	<p>6.6.1 Highways England agrees with HBMCE’s assessment. This accords with the assessment set out in paragraphs 6.11.55 and 6.11.56 of Chapter 6 Cultural Heritage of the Environmental Statement (Document Reference 6.2) [APP-059].</p>
<p>6.7. Prehistoric long barrow and four round barrows 580m and 750m south west of Mitchell Farm (SM 32907; NHLE 1017350).</p> <p>6.7.1. During the construction phase it is proposed that the eastern compound will surround the westernmost area of the scheduling, including a long barrow and a round barrow.</p>	<p>6.7.1 Highways England agrees with HBMCE’s understanding of the construction arrangements.</p>
<p>The significance of the asset.</p>	<p>6.7.2 – 6.7.4 Highways England notes HBMCE’s description of the significance of the asset.</p>

Historic England Written Representation	Highways England Response
<p>6.7.2. Long barrows are earthen or dry stone mounds with flanking ditches of the Early and Middle Neolithic periods (3400-2400 BC). As the communal burial places of Britain's early farming communities, they are amongst the oldest field monuments surviving visibly in the present landscape. There may be several phases of funerary monument preceding the barrows, which were probably important ritual sites for local communities over a long period of time. Long barrows are comparatively rare and are of considerable age, being one of the few types of surviving Neolithic earthworks.</p> <p>6.7.3. Round barrows date mostly to the Late Neolithic and Early Bronze Age (c.2400-1500 BC). They are earthen mounds, sometimes ditched, covering single or multiple burials. They occur either in isolation or, as here, grouped in cemeteries. They often acted as a focus of burials in later periods, and are occasionally associated with earlier long barrows.</p> <p>6.7.4. Both long barrows and round barrows are long lived monument types and often occupy prominent positions in the landscape. Despite being reduced by ploughing, the low mounds with discernible plans remain, as will the underlying old land surface and any surviving original deposits in the base of the mounds. The location of the round barrows in a wider ridge top cemetery, the close association of the long barrow with the later round barrows, and the alignment of the round barrows, illustrate well the important roles of topography and of continuity in prehistoric funerary activity.</p>	
<p>HBMCE's Assessment of Impact on the asset.</p> <p>6.7.5. The western scheduled area of this monument will be enveloped within the proposed eastern works compound. HBMCE are concerned that the Construction Environmental Management Plan (CEMP) does not include a specific strategy for the demarcation and protection of scheduled</p>	<p>6.7.5 – 6.7.7 A draft Scheduled Monument Construction Management Plan will be produced for HBMCE review and comment, the implementation of which will be secured as an annex of the Outline CEMP. It is anticipated this will be submitted at Deadline 4.</p>

Historic England Written Representation	Highways England Response
<p>monuments affected by or adjacent to the Scheme (see CEMP comments at 7.10.6.).</p> <p>6.7.6.HBMCE consider the preparation and implementation of a Scheduled Monuments Construction Management Plan (SMCMP), to be an essential requirement for the preservation of scheduled monuments and the avoidance of otherwise avoidable accidental damage. The management plan should be produced in consultation with HBMCE before it is submitted for approval.</p> <p>6.7.7.Without provision for the production and implementation of an agreed SMCMP, HBMCE are unable to comment on the impact on significance of the monument of the use of this area for a works compound. It is important that this document provides for the acceptable removal and reinstatement of the land surrounding the works compound at Scheme completion and that this is secured in the DCO.</p>	
<p>6.8. The Four Burrows scheduled monument (SM 29602; NHLE 1016064).</p> <p>6.8.1.The scheduled monument the Four Burrows (SM 29602; NHLE 1016064), lies in proximity to the Red Line Boundary. HBMCE is concerned to ensure that the impact of the Scheme on the contribution made by its setting to the significance of this monument is fully considered and appropriately addressed.</p> <p>6.8.2.The scheduled monument known as the Four Burrows straddles the existing A30, with one barrow to the north and three barrows to the south, the southern barrows being further divided by a farm access track with one barrow to the west in the corner of a field which also houses a solar farm and the remaining two to the east of the track.</p>	<p>6.8.1 Please refer to responses provided at 6.8.7 – 6.8.10 of this table.</p> <p>6.8.2 Highways England notes the description of the location of the asset.</p>

Historic England Written Representation

Highways England Response

The significance of the asset.

6.8.3. The Four Burrows themselves are bowl barrows, funerary monuments dating from the Late Neolithic period to the Late Bronze Age, with most examples belonging to the period 2400-1500 BC. The Bronze Age date of the group is confirmed by the discovery in one of the barrows of a megalithic chambered structure containing an inurned cremation. They were constructed as earthen or rubble mounds, sometimes ditched, which covered single or multiple burials. They occur either in isolation or, as at the Four Burrows and the Carland Cross barrows, grouped as cemeteries, often acting as a focus for burials in later periods. They are particularly representative of their period and will retain many of their original features providing information about the monument and the landscape in which it was built.

6.8.4. The monument is situated on a commanding hilltop at Four Burrows, about 350m north west of Fourburrow Farm and are a local landmark for those travelling east on the A30, becoming visible as one progresses from Chiverton Cross. The barrows straddle the parish boundary between Kenwyn and Perranzabuloe with two barrows lying either side of the boundary.

6.8.5. The four barrows vary between 16m and 24m in diameter, and between 2.5m and 3.9m high. Two of the mounds have central circular depressions which indicate antiquarian excavation. The barrows may represent the surviving core of a nucleated round barrow cemetery.

6.8.6. The significance of this monument is reflected in its group designation and reflects the likelihood that these barrows are the surviving remnants of a more extensive barrow cemetery

6.8.3 – 6.8.6 Historic England notes the description of the asset.

Historic England Written Representation

Highways England Response

HBMCE’s Assessment of Impact on the asset.

6.8.7. The proposed route of the new A30 passes approximately 75m to the north of the northernmost scheduled barrow. Although the route passes this point in a cutting, the elevated position and height of the scheduled barrows is such that it is likely that the road will be visible in views to and from the monument. Although the existing A30 passes between this barrow group the Scheme will introduce a further modern element into the setting of the monument.

6.8.8. All four barrows within this scheduling are of similar height and elevation and it is HBMCE’s position that any impact on the northernmost barrow will have a similar effect on those south of the existing A30.

6.8.9. HBMCE consider that the Scheme will introduce a new element into the setting of the barrows with an unavoidable impact on the significance of the monument in the form of a new linear feature passing to the north with the attendant increase in noise levels. However, we also recognise that the de-trunking of the existing A30 will greatly reduce the impact of the current A30 route through the reduction of traffic volume and lessening of noise and fumes, particularly at peak times when traffic is currently often stationary at this point. HBMCE are in discussion with Highways England regarding potential positive works in the form of a narrowing of the existing carriageway and provision of parking to allow safer access to the monument at the Four Burrows.

6.8.10. HBMCE considers that any assessment of impact must consider the scheduled monument as a whole and that the likely overall impact of the scheme on the scheduled monument will result in a level of harm towards the middle of the range that is less than substantial harm.

6.8.7 – 6.8.10 The Highways England position on this matter is explained in Appendix A of the **Comments on Relevant Representations** document submitted at Deadline 1 (Document Reference 8.1) [REP1-004]:

“The northern barrow is physically separated from the remaining barrows by the existing A30 and would be the only barrow in the group to experience an adverse effect.

The views outwards from the group is only one component of setting that contributes to the significance of the barrows; there is also a substantial role played by the immediate setting of the barrows as a group. This interrelationship between the barrows would be unchanged by the proposed scheme, and therefore the impact upon the northernmost barrow cannot be said to influence the significance of the remaining barrows.”

During the meeting on 11 February 2019, Highways England agreed to review the assessment of this asset. This will be submitted during the Examination as an addendum to the Environmental Statement. However, Highways England notes that, in 6.5.1 of HBMCE’s representation, they have considered the impacts of the proposed scheme individually on the northernmost barrow of NHLE 1017050.

Historic England Written Representation	Highways England Response
<p>6.9. The scheduled monument bowl barrow 100m south west of Callestick Vean (SM 29618; NHLE 1016103).</p> <p>6.9.1. The new carriageway will pass between the scheduled monument bowl barrow 100m south west of Callestick Vean (SM 29618; NHLE 1016103), and the existing A30. HBMCE generally concurs with the findings of the ES and considers the proposals will result in a level of harm in the upper reaches of the less than substantial range.</p>	<p>6.9.1 Highways England agrees with HBMCE’s assessment.</p>
<p>6.10. The scheduled monument hill fort 250m south west of Tresawsen (SM 29671; NHLE 1016445).</p> <p>6.10.1. The scheduled monument hill fort 250m south west of Tresawsen (SM 29671; NHLE 1016445), lies to the north of the existing A30. The proposed new carriageway runs to the south of the existing A30. HBMCE concurs with the findings of the ES and considers the level of harm to be low in the scale of less than substantial.</p>	<p>6.10.1 Highways England agrees with HBMCE’s assessment. This is documented in paragraph 6.11.85 of Chapter 6 Cultural Heritage of the Environmental Statement (Document Reference 6.2) [APP-059].</p>
<p>6.11. The scheduled monument bowl barrow 130m south east of Penglaze (SM 29680; NHLE 1016887).</p> <p>6.11.1. The new carriageway passes to the south of the existing A30, which also passes to the south of the scheduled monument bowl barrow 130m south east of Penglaze (SM 29680; NHLE 1016887). HBMCE concurs with the findings of the ES and considers the level of harm to be low in the scale of less than substantial.</p>	<p>6.11.1 Highways England agrees with HBMCE’s assessment. This is documented in paragraph 6.11.51 of Chapter 6 Cultural Heritage of the Environmental Statement (Document Reference 6.2) [APP-059].</p>
<p>6.12. The Three Burrows scheduled monument (SM 29604; NHLE 1016056).</p> <p>6.12.1. The new junction and slip roads at Chiverton will pass to the north of the scheduled monument The Three Burrows. HBMCE concurs with the</p>	<p>6.12.1 Highways England agrees with HBMCE’s assessment. This is documented in paragraph 6.11.17 of the Environmental Statement (Document Reference 6.2) [APP-059].</p>

Historic England Written Representation	Highways England Response
findings of the ES and considers the level of harm to low in the scale of less than substantial.	
<p>6.13. Cornwall and West Devon Mining Landscape World Heritage Site (NHLE 1000105).</p> <p>6.13.1. Much of the landscape of Cornwall and West Devon was transformed in the 18th and early 19th centuries as a result of the rapid growth of pioneering copper and tin mining. Its deep underground mines, engine houses, foundries, new towns, smallholdings, ports and harbours, and their ancillary industries together reflect prolific innovation which, in the early 19th century, enabled the region to produce two-thirds of the world's supply of copper. The substantial remains are a testimony to the contribution Cornwall and West Devon made to the Industrial Revolution in the rest of Britain and to the fundamental influence the area had on the mining world at large. Cornish technology embodied in engines, engine houses and mining equipment was exported around the world. Cornwall and West Devon were the heartland from which mining technology rapidly spread.</p>	6.13.1 Highways England notes HBMCE's description of the Cornwall and West Devon Mining Landscape World Heritage site.
6.13.2. An area of the World Heritage Site (WHS) is situated south west of the existing Chiverton Cross A30 junction. HBMCE does not consider that the Scheme will result in any significant impacts upon the Outstanding Universal Value (OUV), of the WHS and will not comment further in this document.	6.13.2 Highways England agrees with HBMCE's assessment. This is documented in paragraph 6.11.82 of Chapter 6 Cultural Heritage of the Environmental Statement (Document Reference 6.2) [APP-059] where it is stated that a slight beneficial effect is anticipated.
<p>6.14. Two individually listed Grade II Milestones (NHLE 1140923) and (NHLE 1394843).</p> <p>6.14.1. Two grade II listed Milestones (NHLE Nos. 1140923 and 1394843), located at NGR SW771486 and SW845539 on the A30 within the</p>	6.14.1 – 6.14.3 Highways England note the description of the two listed Grade II Milestones.

Historic England Written Representation	Highways England Response
<p>Development Consent Order (DCO) boundary, will be directly impacted. These listed milestones are the subject of Annex J of the CEMP.</p> <p>6.14.2. The first of these two Grade II Listed milestones (NHLE 1140923) is believed to have been moved at some point in its history because it is not in sequence with mileage on the next stone to the east. This stone formed part of the original turnpike scheme from the 18th century and has a recut inscription indicating re-use. The milestone provides valuable evidence of transport development on this major route.</p> <p>6.14.3. The second of the two Grade II Listed milestones (NHLE 1394843), also dates from the 18th century, however, the inscriptions were altered in the late 19th century. Unusually, it was placed on a section of road that was never turnpiked and provides important evidence for the County Council's adoption of such roads in the late 19th century. The milestone, with others on the route, as a group provides valuable evidence of transport development on this major route.</p>	
<p>HBMCE's Assessment of Impact on the assets.</p> <p>6.14.4. The Scheme will result in the removal of both milestones and re-instatement at appropriate locations on the de-trunked A30. HBMCE considers the impact on both of these milestones to be less than substantial.</p> <p>6.14.5. In considering the impact on these milestones HBMCE has noted the arrangements outlined in Volume 6 Document Ref 6.4 ES Appendix 16.1 – Outline CEMP Annex J: Methodology for the Milestone Protection Management Plan.</p>	<p>6.14.4 Highways England agrees with HBMCE's assessment. This is documented in paragraphs 6.11.30 and 6.11.68 of Chapter 6 Cultural Heritage of the Environmental Statement (Document Reference 6.2) [APP-059].</p> <p>6.14.5 Highways England notes that HBMCE has had regard to Annex J: Methodology for the Milestone Protection Management Plan in the Outline CEMP Annexes (Document Reference 6.4) [APP-376].</p>

Historic England Written Representation	Highways England Response
<p>6.15. The Grade II Listed Building: Church of St Peter at Chiverton, Grade II (NHLE no. 1141481).</p> <p>6.15.1. The Grade II Listed (LB), Church of St Peter (NHLE 11141481), was built in 1847 of Killas rubble with granite and freestone dressings. The tower was rebuilt in 1898 and is a landmark in the historic landscape in which the A30 sits. Despite its relatively level situation and later encroachment around the church, the church tower is still a prominent feature and adds to the architectural and aesthetic significance of the building. Its prominence is illustrative of the long tradition of church towers as the most prominent features in the landscape and its importance as a landmark for travellers.</p> <p>6.15.2 Although the Church of St Peter is Grade II Listed (NHLE no. 1141481), in this instance HBMCE have maintained concerns that the photomontage supplied (VP4), Burrows. This photomontage will be required in order to allow an informed assessment to be made of the impact the proposed new junction at Chiverton on this important historic landscape feature.</p>	<p>6.15.1 Highways England notes the description of the asset.</p> <p>6.15.2 A photomontage will be produced from locations at Four Burrows to provide a view towards St Peter’s Church. This will be submitted during the Examination.</p>
<p>6.16. The Grade I Listed Building at Trerice (NHLE 1328731).</p> <p>6.16.1. Although is sits outside the 300m Scheme study area, HBMCE have requested assessment of this Grade I house in order to confirm that the proposals will not impact upon its significance.</p>	<p>6.16.1 At the meeting on 11 February 2019 it was agreed that Highways England will undertake an assessment of the Grade I Listed Building at Trerice. This will be included as an Addendum to the Environmental Statement and will be submitted during the Examination.</p>
<p><i>7. Environmental Statement</i></p>	
<p>7.1. HBMCE has reviewed the Environmental Statement (ES), primarily focusing on Chapters 6 Cultural Heritage and Chapter 7 Landscape and their associated appendices.</p>	

Historic England Written Representation	Highways England Response
<p>7.2. Chapter 6 Cultural Heritage</p> <p>7.2.1. Four Burrows scheduled monument</p> <p>7.2.2. Paragraph 6.11.23. Although views to the west and south from the westernmost barrow, south of the A30 do include an extensive solar farm, it should be noted that this is a static feature that is experienced in, but does not impede upon, those views. Although the solar farm is evident in these views it does not impede views out from the barrows over their setting or views across the solar array to the barrows</p>	<p>7.2.2 Highways England agreed with HBMCE’s comment, however the solar farm is a significant modern intrusion in this view nonetheless, and therefore Highways England considers the description in paragraph 6.11.24 of Chapter 6 Cultural Heritage of the Environmental Statement (Document Reference 6.2) [APP-059] to be accurate.</p>
<p>7.2.3. HBMCE concurs with the assessment of impact presented for the northern barrow; however, we consider that this significance of effect applies to the monument as a whole. Whilst the view to the north from the southern barrows does include the existing A30, because of location, topography and scale, those views are otherwise the same as those from the northern barrow and any significance of effect should reflect this.</p> <p>7.2.4. HBMCE considers that the significance of this barrow group must be considered as a whole, as part of a former barrow cemetery and that any assessment of impact on the scheduled monument must include the scheduled area as a whole.</p>	<p>7.2.3 -7.2.4 Please see response to point 6.8.10 in this table.</p>
<p>7.3. Two bowl barrows 290m and 375m north of Higher Ennis Farm.</p> <p>7.3.1. HBMCE concurs with the proposed significance of effect for both the operational (6.11.59), and construction (6.11.60 temporary), phases.</p>	<p>7.3.1 Highways England notes this agreement.</p>

Historic England Written Representation	Highways England Response
<p>7.4. Round barrow cemetery 420m north east of Higher Ennis Farm</p> <p>7.4.1. HBMCE awaits further visualisations in order to consider a fully informed understanding of the significance of effect for the operational phase of the Scheme (6.11.63). It is not as yet clear how much the views to the north will be truncated by the western extent of the embanked slip road.</p> <p>7.4.2. HBMCE is pleased to note the comments regarding demarcation and protection during construction at 6.11.64; however, we are unable to locate any method statement for the protection of scheduled monuments during construction in the CEMP.</p>	<p>7.4.1 Photomontages will be produced from locations to be agreed with HBMCE and will be submitted to the Examination by Deadline 4.</p> <p>7.4.2 Please refer to the response provided in point 6.7.7 in this table.</p>
<p>7.5. Warren’s Barrow</p> <p>7.5.1. Regarding the loss of views to the north and west over Newlyn Downs, HBMCE considers the assessment of significance of effect at 6.11.72 does not adequately reflect the importance of these views. Consequently we consider that despite the benefits arising from the removal of the existing A30, which does not lessen the Large Adverse significance of effect.</p> <p>7.5.2. The importance of location to the significance of barrows has been mentioned previously in our response, it is, however, important to understand the critical importance of visibility to the deliberate location of barrows. The complete obstruction of these views will largely divorce the barrow from its wider setting and reason for location.</p> <p>7.5.3. HBMCE concurs with the assessment of significance of effect for the construction phase (6.11.73 temporary), and would repeat our comments regarding the need for a method statement covering the protection of scheduled monuments during construction to be included in the CEMP.</p>	<p>7.5.1 Highways England agrees with this point and will revise the assessment in Chapter 6 Cultural Heritage of the Environmental Statement (Document Reference 6.2) [APP-059] to reflect a greater degree of harm. This will be reported in an Addendum to the Environmental Statement, and will be submitted during the Examination.</p> <p>7.5.2 Highways England agrees that the obstruction of views from Warren’s Barrow towards Newlyn Downs would largely divorce the barrow from its wider setting and reason for location.</p> <p>7.5.3 Please refer to the response provided in point 6.7.7 in this table.</p>

Historic England Written Representation	Highways England Response
<p>7.6. Prehistoric long barrow and four round barrows 580m and 750m south west of Mitchell Farm.</p> <p>7.6.1. HBMCE concurs with the assessment of significance of effect for the construction phase (6.11.77 temporary), and would repeat our comments regarding the need for a method statement covering the protection of scheduled monuments during construction to be included in the CEMP.</p>	<p>7.6.1 Please refer to the response provided in point 6.7.7 in this table.</p>
<p>7.7. Chapter 7 Landscape</p> <p>7.7.1. The Environmental Masterplans illustrate the proposed planting schemes for mitigation and enhancement. Whilst 7.10.29 refers specifically to Planning Policy Features, including scheduled monuments, all planting proposals have the potential, through inappropriate planting, to impact upon the significance of those monuments.</p> <p>7.7.2. The Environmental Masterplans 4 and 18 illustrate the landscaping at Four Burrows and Carland Cross respectively, confirming that the planting regimes are not in conflict with the requirements of the significance of the scheduled monuments.</p> <p>7.7.3. At 7.11.44 the effects on heritage receptors are considered. The year one effects on scheduled barrows at Callestick Vean (1016105), and (1016103), are considered to be moderate and large adverse respectively, reducing to slight and moderate by year 15, however, this would be achieved by deciduous planting partially obscuring the view. It is important to ensure that any such screening planting does not in itself result in further adverse effects on the significance of heritage assets.</p> <p>7.7.4. The impacts on the barrow cemetery as a whole at Carland Cross is assessed as large adverse in year one, with no noticeable decrease by year 15. The requirement for low height planting in keeping with the landscape character is noted. Whilst planting will help to soften the visual impact of the</p>	<p>7.7.1 – 7.7.4 Highways England notes HBMCE’s observations on the Chapter 7, Landscape of the Environmental Statement (Document Reference 6.2) [APP-060].</p>

Historic England Written Representation	Highways England Response
<p>construction works here, we welcome the acceptance that any tall species will be inappropriate at this location because of increased impacts on the significance of the barrow cemetery.</p>	
<p>7.8. Table 7-13</p> <p>7.8.1. VP 4 view across the landscape, within which the tower of Grade II Listed St Peter’s Church and the nearby Four Burrows barrow cemetery. This entry is supported by Viewpoint four of Figure 7-5 of Volume 6 Document Ref: 6.3: Photosheets. We would note that the photograph looks west across farmland rather than south west towards St Peter’s church.</p> <p>7.8.2. This document does not include any visualisations from the round barrow cemetery at Carland Cross generally or from Warren’s Barrow in particular despite previous requests. These are essential to understanding the actual visual impact of the Scheme and allowing for an informed assessment of harm to be made.</p>	<p>7.8.1 Highways England agrees with this statement.</p> <p>7.8.2 Following the meeting between HBMCE and Highways England on 11 February 2019, it was agreed that a photomontage of the scheme from the barrow cemetery will be provided to HBMCE during the Examination. This is being prepared for discussion with HBMCE.</p>
<p>7.9. 7.3 Mitigation Route Map.</p> <p>7.9.1. Table 2-1 Mitigation Route Map</p> <p>7.9.2. HBMC supports the requirement at CH2 to produce and implement a Written Specification of Archaeological Investigation (WSI), for the scheme in areas of archaeological interest; however, we would suggest that this covers archaeological monitoring of all excavation works as determined by the archaeological contractor who should be present during all relevant groundworks. An appropriate and proportionate response to the potential for archaeological remains should be identified as part of the WSI under the CEMP to be executed by a recognised professional and appropriately experienced archaeological team.</p>	<p>7.9.2-7.9.7 Highways England agrees with HBMCE regarding the content of the Written Scheme of Investigation (WSI). The WSI will be produced by the appointed archaeological contractors and an updated version of the WSI will be produced. An outline document is contained at Annex F: Outline Written Scheme of Investigation of the Outline CEMP Annexes (Document Reference 6.4, Appendix 16.1) [APP-376].</p> <p>Requirement 9 of the draft DCO (Document Reference 3.1(C)) secures a scheme for the investigation and mitigation of areas of archaeological interest, reflecting the mitigation measures included in Chapter 6 Cultural Heritage of the Environmental Statement (Document Reference 6.2) [APP-059]. This is required prior to the commencement of development.</p> <p>The Scheduled Monument Management Plan will be produced by Deadline 4 of the Examination and will form an Annex to the Outline CEMP. It will include</p>

Historic England Written Representation	Highways England Response
<p>7.9.3. HBMCE recommends that the WSI include a strategy for the investigation and implementation of environmental sampling and processing.</p> <p>7.9.4. HBMCE supports the requirement that the WSI be prepared in consultation with HBMCE, the local authority's specialist archaeological and conservation advisors, the relevant planning authority and the local highway authority, agreed with HBMCE and Cornwall Council and submitted and approved by the Secretary of State.</p> <p>7.9.5. HBMCE supports the production of a Milestone Protection Management Plan as described in Annex J of the Outline CEMP.</p> <p>7.9.6. The Mitigation Route Map contains no reference to the need for a Scheduled Monument Management Plan in order to ensure the monuments are adequately marked and protected during construction works. This should be a requirement of the CEMP.</p> <p>7.9.7. HBMCE has identified the need for the identification of appropriate exclusion areas around the scheduled monuments adjacent to or affected by the construction works or temporary works compounds to be established under the CEMP to ensure their protection from physical construction effects. However, we are concerned that this does not appear to have been secured in the DCO which would mean that notwithstanding any area being identified, there is no apparent mechanism to ensure that exclusion areas would be provided and the timing for its provision. In addition, the positioning, form and extent of any buffer zones are yet to be clarified and agreed.</p>	<p>provisions to secure the matters highlighted in paragraph 7.9.7 of the Historic England Written Representation.</p>
<p><i>7.10. Construction Environmental Management Plan (CEMP)</i></p>	

Historic England Written Representation	Highways England Response
<p>7.10.1. Training and site induction – 16.8.6. – This should include the location, extent, special provisions and, liabilities of all concerned regarding the scheduled monuments affected or adjacent to the Scheme.</p>	<p>7.10.1 Highways England will update paragraph 16.8.6 of the Outline CEMP (Document Reference 6.4) [APP-375] to include the comments regarding training/site induction concerning the scheduled monuments.</p>
<p>7.10.2. Annex F: Outline Written Scheme of Investigation (WSI).</p> <p>(a) The WSI should be prepared by the applicant’s chosen archaeological contractor and submitted for approval to the County Archaeologist and HBMCE.</p> <p>(b) The WSI should include a detailed environmental sampling, investigation, processing and reporting strategy.</p> <p>(c) The WSI should include provision for the removal of any human remains encountered in the course of the works.</p> <p>(d) The WSI should be adhered to in full, including post-excavation and specialist works and reporting.</p>	<p>7.10.2. Please refer to the response provided at points 7.9.2 – 7.9.7 within this table.</p> <p>Requirement 9 of the draft DCO (Document Reference 3.1(C)) secures a scheme for the investigation and mitigation of areas of archaeological interest, reflecting the mitigation measures included in Chapter 6 Cultural Heritage of the Environmental Statement (Document Reference 6.2) [APP-059]. This is required prior to the commencement of development.</p>
<p>7.10.3 Annex J: Methodology for the Outline Milestone Protection Management Plan. The outline MPMP should be agreed with the relevant Conservation Officer.</p>	<p>7.10.3 Highways England will update Annex J of the Outline CEMP Annexes (Document Reference 6.4) [APP-376] to describe the approval process for the Milestone Protection Management Plan (MPMP).</p>
<p>7.10.4. Annex M: Public Rights of Way Management Plan. HBMCE requires clarification of access rights to be created at the Carland Cross barrow cemetery.</p>	<p>Annex M: Public Rights of Way Management Plan of the Outline CEMP Annexes (Document Reference 6.4, Appendix 16.1) [APP-376] includes for a new section of restricted byway to the south of the A30. This PRoW would link to the proposed new underpass and follow the line of the existing A30, connecting to A39. It would run through the area of Carland Cross and Warren’s Barrow, providing improved accessibility into the areas.</p>

Historic England Written Representation	Highways England Response
	<p>In addition to this PRoW provision, Chapter 12 People and Communities of the Environmental Statement (Document Reference 6.2) [APP-065] explains proposals to include the area of Warren’s Barrow as replacement open access land in order to replace land to be acquired, which is located approximately 250m west of Carland Cross junction. This would allow access rights to the land as prescribed in the Countryside and Rights of Way Act 2000 (CROW Act).</p> <p>The area proposed as replacement land is shown on the Special Category Land Plan submitted as part of the application (Document Reference 2.3(A)) [AS-013].</p>
<p>7.10.5. Annex N: Outline method statement for the translocation of heathland. There should be no excavation, cultivation or scarification of the land in which the Carland Cross barrow cemetery is located for the purposes of heathland creation.</p>	<p>7.10.5 The translocation receptor site would be north of existing A30, and likely close to the existing SAC boundary. No habitat mitigation or enhancement measures have been designed within the Carland Cross barrow cemetery field, south of the existing A30. As such, no excavation, cultivation or scarification for the purposes of heathland creation would occur in the Carland Cross barrow cemetery.</p>
<p>7.10.6. There are currently no procedures in place to secure the demarcation and protection of affected and adjacent scheduled monuments during the construction phase. HBMCE considers the preparation and implementation of a scheduled monuments construction management plan (SMCMP), to be an essential requirement for the preservation of the monuments and the avoidance of accidental damage. The management plan should be produced in consultation with and the approval of HBMCE.</p>	<p>7.10.6 A Scheduled Monuments Construction Management Plan will be produced for HBMCE comment, the implementation of which will be implemented through the Outline CEMP (Document Reference 6.4) [APP-375]. It is anticipated this will be submitted at Deadline 4.</p>

Historic England Written Representation	Highways England Response
<p>7.10.7. Despite consultation neither the ES, CEMP, nor DCO appear to contain provision for the production, implementation and publication of an integrated interpretation strategy. HBMCE considers the production of an integrated interpretation strategy to be an essential outcome of the Scheme if it is to be considered as a mitigating factor in their landscape. This strategy should incorporate on-site interpretation.</p>	<p>7.10.7 A high level interpretation strategy will be included within the Outline CEMP (Document Reference 6.4) [APP-375] and will be discussed with HBMCE. Interpretation and publication will be commensurate with the significance of the heritage assets affected by the proposed scheme.</p>
<p><i>8. Development Consent Order (DCO)</i></p>	
<p>8.1. The purpose of HBMCE's comments on the DCO is to ensure that if appropriate mitigation measures are required to address any issues, that these are set out in the DCO and their provision is then undertaken and maintained to ensure that the protection and conservation of the designated heritage assets is delivered. This is important not only during detailed design of the Scheme, but during its construction implementation and operation of the Scheme. This includes the production of and referral to appropriate management documents and an archaeological and historic environment mitigation strategy for any designated and non-designated assets that may be affected. The points raised below are issues that we consider need to be dealt with in the terms of the DCO.</p> <p>8.2. The following comments cover articles under Part 1-7, and Schedules 1 to 10:</p>	

Historic England Written Representation	Highways England Response
<p>Part 2, Limits of Deviation</p> <p>8.2.1. HBMCE would welcome confirmation from the Applicant that the limit of lateral deviation included on the Works Plans (Sheet 3, 6, 7, and 8) will not entail encroachment within the scheduled monuments; two bowl barrows 290m and 375m north of Higher Ennis Farm; round barrow cemetery 420m north east of Higher Ennis Farm; and Warren’s Barrow. The WSI to be included under the CEMP as part of the DCO should be designed to cover the area included within the full limit of deviation, both lateral and vertical.</p>	<p>8.2.1 Highways England can confirm that the lateral deviation of the scheme as shown on Sheets 3, 6, 7, and 8 of the Works Plans (Document Reference 2.4(A-B)) [AS-016, AS-019, AS-020, AS-021] would not encroach within the Scheduled Monuments; two bowl barrows 290m and 375m north of Higher Ennis Farm; round barrow cemetery 420m north east of Higher Ennis Farm; and Warren’s Barrow.</p>
<p>8.2.2. HBMCE is concerned that the 0.5m vertical limit of deviation at Carland Cross may limit any alternative engineering options that would reduce the impact on Warren’s Barrow scheduled monument through reduction of levels. In order to reduce the obstruction of views and subsequent impact up upon Warren’s Barrow and the round barrow cemetery scheduled monuments it would be necessary to reduce the levels of the slip road and car carriageway. We are informed that in order for this to over 500mm. The scheme start point east of Carland Cross may need to move further east in order to accommodate this.</p>	<p>The scheme design cannot be changed beyond the limits of deviation expressed in Article 8 of the draft Development Consent Order (Document Reference 3.1(C)).</p> <p>As detailed in Highways England’s response to the Historic England Relevant Representation in Appendix B of the Comments on Relevant Representations (Document Reference 8.1) [REP1-004], the route is highly constrained horizontally and vertically in this area due to the abandoned quarry pond and bowl barrow (north of Higher Ennis Farm) to the west; the wind turbines and their exclusion zones and the Newlyn Downs European Designated Site (SAC) to the north; the tie-in to the existing A30 to the east; and, the tie-in to the existing Carland Cross roundabout to the south.</p> <p>Any lowering of the vertical alignment of the A30 and associated side roads at Carland Cross by anything more than 0.5m would result in a direct impact on the quarry pond and its water level; would require a change of form of retaining structure at the bowl barrow with an increased risk of impact on associated buried archaeology; would lead to encroachment into the wind turbine exclusion zones which is not permitted; and, would lead to increased</p>

Historic England Written Representation	Highways England Response
	<p>programme and costs and health and safety risks with a longer length of tie-in works to the existing A30.</p> <p>A 0.5m change in vertical alignment is within the set allowable limits of deviation for the scheme, as defined in the draft Development Consent Order and outlined in Chapter 4 Approach to Environmental Impact of the Environmental Statement (Document Reference 6.2) [APP-057].</p>
<p>Part 4, Supplemental Powers:</p> <p>8.2.3. 20. Discharge of water - Any proposed works associated with the laying down, taking up or alteration of pipes for the drainage of water should have regard to the archaeological potential of the area and if necessary be subject to the requirements of the WSI included in the CEMP based on the advice of the local planning authority's archaeological adviser. The provisions as currently drafted do not appear to ensure that this will be secured.</p>	<p>8.2.3.20 The Outline CEMP (Document Reference 6.4) [APP-375] will be amended to include liaison with the local planning authority's archaeological advisor.</p>
<p>8.2.4. 21. Protective works to buildings – The special architectural and historic interest of any listed building affected should be appropriately protected from collateral damage during construction of the Scheme. The special architectural and historic interest of any listed building affected should be a primary consideration with any works. The local planning authority and HBMCE should be consulted on any works affecting a Grade I or Grade II* listed building, and the local planning authority should be consulted on any works affecting a Grade II listed building.</p>	<p>8.2.4 Highways England agrees that it is an offence to damage a listed building and note that there are no proposed works to listed buildings on the scheme, save for proposed works designed to safeguard listed milestones during construction – see Annex J: Methodology for the Milestone Protection Management Plan of the Outline CEMP Annexes (Document Reference 6.4) [APP-376].</p>

Historic England Written Representation	Highways England Response
<p>8.2.5. 22.1.c Authority to survey and investigate land - HBMCE would expect the Applicant to agree in advance the extent, scope and methodology of any archaeological survey or investigation conducted with the local planning authority and (where a scheduled monument is involved) HBMCE under the WSI to be included under the CEMP. This should be completed sufficiently in advance of the commencement of construction for the results to be analysed to inform an appropriate and proportionate mitigation strategy for that same part of the Scheme.</p>	<p>8.2.5 This is adequately secured by Requirement 9 (archaeology), which provides for Cornwall Council and the County Archaeologist to be consulted on the WSI and mitigation measures prior to commencement.</p>
<p>8.2.6. 27 (3)(c) Public Rights of Way – HBMCE would expect the applicant to agree in advance the extent of new public rights of access to the scheduled monuments that form the Carland Cross barrow cemetery.</p>	<p>Annex M: Public Rights of Way Management Plan of the Outline CEMP Annexes (Document Reference 6.4, Appendix 16.1) [APP-376] includes for a new section of restricted byway to the south of the A30. This PRoW would link to the proposed new underpass and follow the line of the existing A30, connecting to A39. This new PRoW would run through the area of Carland Cross and Warren’s Barrow, providing improved accessibility into the areas.</p> <p>In addition to this PRoW provision, Chapter 12 People and Communities of the Environmental Statement (Document Reference 6.2) [APP-065] explains proposals to include the area of Warren’s Barrow as replacement open access land in order to replace land to be acquired, which is located approximately 250m west of Carland Cross junction. This would allow access rights to the land as prescribed in the Countryside and Rights of Way Act 2000 (CROW Act).</p> <p>The area proposed as replacement land is shown on the Special Category Land Plan submitted as part of the application (Document Reference 2.3(A)) [AS-013].</p>
<p>Schedule 1 – Authorised Development.</p>	<p>8.3 Annex F Outline Written Scheme of Investigation of the Outline CEMP Annexes (Document Reference 6.4) [APP-376] will include all areas of the scheme where direct impact may occur.</p>

Historic England Written Representation	Highways England Response
<p>8.3. Works 12 to 74 Diversion of drainage, power and other utilities. Any potential for works to affect non-designated archaeological remains should be appropriately addressed under the WSI to be included under the CEMP.</p>	
<p>Schedule 2 – Part 1, Requirements:</p> <p>8.3.1. Construction Environmental Management Plan, CEMP (3) – HBMCE has reviewed and provided comments on the draft Outline Environmental Management Plan (OEMP), above.</p> <p>8.3.2. All archaeological investigation conducted under the WSI not yet completed to date should be completed sufficiently in advance of the commencement of construction for the results to be analysed and inform an appropriate and proportionate mitigation strategy for that same part of the Scheme.</p> <p>8.3.3. Given the potential for archaeological remains to be uncovered which are directly associated with the nationally important archaeological remains of any scheduled monument affected by the Scheme, HBMCE would wish to be consulted on the scope, extent and methodology for archaeological work in the relevant parts of the Scheme under the WSI.</p> <p>8.3.4. The WSI should include for the removal of human remains – Consent will need to be obtained from the Secretary of State for Justice to remove human remains. HBMCE would expect the treatment of human remains to be addressed under the WSI to be included under the CEMP.</p> <p>8.3.5. It is essential that the Scheme confirms that provision is made for adequate post excavation and analysis works and for subsequent reporting and publication including and publication of information about the historic A30 route and the investigation undertaken historically and as part of this Scheme in a popular, accessible format.</p>	<p>8.3.2-8.3.5 An updated Annex F Outline Written Scheme of Investigation of the Outline CEMP Annexes (Document Reference 6.4) [APP-376] will be produced and will include these provisions.</p> <p>Requirement 9 of the DCO states that:</p> <p><i>‘No part of the authorised development is to commence until for that part a scheme for the investigation and mitigation of areas of archaeological interest....has been prepared in consultation with the relevant planning authority and the local highway authority, agreed with the County Archaeologist and submitted to and approved in writing by the Secretary of State..’</i></p>

Historic England Written Representation	Highways England Response
<p><i>9. Summary and Conclusion</i></p>	
<p>9.1. In conclusion and to summarise our written representation, HMBCE considers that there remain to be addressed important issues requiring action and clarification by the Applicant. These are detailed in our written representations. HMBCE understands through discussions with the Applicant that some of these issues are in hand. These, together with the other issues highlighted, are matters which HMBCE considers are 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 Examining Authority in its final assessment of the Scheme.</p>	<p>Highways England has provided detailed responses to the Relevant Representation and now the Written Representation submitted by Historic England – setting out relevant points of clarification and what actions are being taken to provide additional clarity / detail as appropriate. It is Highways England intention that progress against these actions can recorded within the Statement of Common Ground with Historic England.</p>
<p>9.2. HMBCE considers the following to be the main issues arising from the scheme;</p> <p>(a) The Scheme will result in varying levels of less than substantial harm to a number of designated heritage assets including ten schedule`ed monuments.</p> <p>(b) The scheme will result in a high level of harm to the Carland Cross barrow group, which includes at least five scheduled monuments. This applies especially to Warren’s Barrow which will lose an element of its significance and to the scheduled round barrow cemetery upon which we await further visualisation, but which also has the potential for loss of significance.</p> <p>(c) The potential for unintended damage to a number of scheduled monuments within or adjacent to the Scheme is high. The scheme does not include adequate provision to provide for protection during construction works.</p>	<p>9.2 The matters summarised here are responded to in detail at the following points above, within this table:</p> <p>(a) 7.2.1 to 7.6.1</p> <p>(b) 7.4.1 to 7.5.3</p> <p>(c) 6.7.5 to 6.7.7 and 7.9.2 to 7.9.7</p>

Historic England Written Representation	Highways England Response
<p>9.3. The scheme has the potential to provide a degree of some benefits through the provision of environmental improvements including the provision of access, the reconnection of Warren’s Barrow with the wider barrow cemetery at Carland Cross, the provision of on-site interpretation, and the dissemination of information through publication.</p> <p>9.4. Also important, with regards to the design proposals to mitigate the impact of the Scheme on the significance of the designated heritage assets, will be securing a long term management plan. HBMCE is therefore keen to gain a better understanding of long term management proposals, and that these will be properly secured within the DCO.</p> <p>9.5. This section concludes the Written Representation of HBMCE.</p>	<p>9.3 The matters here are responded to in detail at point 7.5.8 within this table.</p> <p>9.4 Highways England will continue to engage with HBMCE regarding the long term management of heritage assets impacted by the proposed scheme.</p>
<p>9.6. HBMCE will continue to discuss those matters yet to be agreed as part of a positive, constructive dialogue with the Applicant, in the interests of identifying solutions to the range of outstanding issues identified in this Written Representation concerning the avoidance and minimisation of harm to the historic environment that arises under the Scheme</p>	<p>As stated above, it is Highways England preference that progress against the actions / clarifications will be recorded within the Statement of Common Ground with Historic England and submitted at Deadline 3 for the benefit of the ExA and interested parties.</p>

Appendix B: Highways England Response to St. Allen Parish Council Written Representation

Cllr Jonathan McCulloch JP
Chairman,
St Allen PC
Higher Balstyle,
Zelah,
Truro
TR4 9JJ

Josh Hodder
Highways England
Temple Quay House
2 The Square, Temple Quay
Bristol, BS1 6HA

19 March 2019
Our Ref:
TR010026

Dear Cllr McCulloch JP,

Applicant's response to St. Allen Parish Council Written Representation

This letter provides Highways England's response to the Written Representation submitted by the St. Allen Parish Council in relation to the A30 Chiverton to Carland Cross scheme. Appended to this letter in Annex A is a detailed response to the points raised in your Written Representation.

As directed by the Examining Authority in the Preliminary Meeting held on 6 February 2019, we consider that it would be helpful to document an agreed position in the form of a concise Statement of Common Ground (SoCG) for the benefit of the Examining Authority and other interested parties.

Michael Baker, the Stakeholder Lead for the project, will be in touch to discuss this response further.

Yours faithfully,



Josh Hodder
Project Manager
A30 Chiverton to Carland Cross

Enc.

Annex A – Applicant Response to St. Allen Parish Council Written Representation

cc: Janet Richie, Clerk of St. Allen Parish Council

Annex A:

Applicant Response to St. Allen Parish Council Written Representation

St. Allen Parish Council Written Representation	Highways England Response
<p>Over the whole length of the road, the Parish Council supports:</p> <ul style="list-style-type: none"> • The construction of a new dual carriageway, rather than widening the current road; • Noise mitigation on the road surface (i.e. a quiet road surface between Pennycomequick and Nanteague); • Visual mitigation for properties along the whole route, both during and after construction of the new road. • The Parish Council requests considerable speed reduction measures on the existing A30 when it is de trunked. 	<p>Highways England notes the support for the scheme in addition to the noise and visual mitigation measures.</p> <p>As stated in Cornwall Council’s Local Impact Report [REP1-011]:</p> <p><i>“The existing A30 will be retained as a parallel route and ‘de-trunked’ with Cornwall Council taking over responsibility and maintenance for the road once the new scheme is open.”</i></p> <p>As such, Cornwall Council will decide the speed limits on the existing A30 once the new A30 is operational. Current proposals are contained in Drawing A2 of Cornwall Council’s Local Impact Report [REP1-011].</p>
<p>Western Section (Marazanvose – Two Burrow Hill)</p> <ul style="list-style-type: none"> • We believe that the process for design of the proposed route through Marazanvose was flawed. Furthermore, road levels are now not as per the original July 2017 proposal. The Parish Council believes the road level should be at the original height. Taking the route through Marazanvose will affect local properties and businesses and so there should be considerable sound and visual mitigation in place both during and after construction, which should not just rely on trees growing. 	<p>The purpose of the Preferred Route Announcement is to protect land required for the proposed route from development. The engineering design was carried out in more detail following this announcement and was subject to the statutory consultation from 29 January to 12 March 2018, as reported in the Consultation Report (Document Reference 5.1) [APP-029].</p> <p>At the section of the scheme adjacent to Marazanvose, the level of the road was lowered by approximately 2m in response to comments at statutory consultation. The proposed road level allows an acceptable highway drainage solution for the new A30, taking into account the geotechnical constraints of high ground water levels, and the need for the outfall to the adjacent watercourse in this location. Lowering the road level any further would lead to groundwater problems with the earthworks and with the highway drainage pond number 10, as shown on Sheet 4 of the Works Plans (Document Reference 2.4(B)).</p> <p>The combination of the 2m cutting, the 3m high close boarded noise barriers, and the oak rich woodland screen planting at the top of the cutting extends the visual and noise screening to a minimum total height of 5m. This is an</p>

St. Allen Parish Council Written Representation

Highways England Response

equivalent height of screening to the vertical alignment which was discussed at Preferred Route Announcement.

In terms of construction stage visual effects on the residents at Marazanvose, Table 7-11 in **Chapter 7 Landscape** of the Environmental Statement (Document Reference 6.2) [APP-060] states that these are predicted to be large adverse and significant.

At Marazanvose, mitigation measures to avoid landscape and visual effects which are part of the scheme design comprise:

- Engineering design of the alignment and cutting to retain existing Cornish hedgerow and vegetation on the Marazanvose side of the proposed A30. This design measure was included to retain visual screening and to better integrate the scheme into the landscape.
- Deepening the cutting opposite Marazanvose to reduce the visual prominence of the scheme and vehicles using it.

Effects on the visual amenity of the community at Marazanvose in the first operational year are predicted to be large, adverse and significant as stated in paragraph 7.11.27 of **Chapter 7 Landscape** of the Environmental Statement (Document Reference 6.2)[APP-060]. As a result of this, landscape mitigation measures were added to the scheme to reduce these effects as much as possible. These measures include:

- 5 to 10m proposed oak rich woodland on the cutting slope (between the existing A30 and the proposed new A30). This mitigation planting was included to provide a robust visual screen in views from properties in Marazanvose.
- Woodland and scrub planting on the north (cutting) side of the proposed 3m high close boarded timber fence opposite Marazanvose. As it matures this would screen the fence from view.

St. Allen Parish Council Written Representation	Highways England Response
	<p>As this mitigation establishes and grows over the first fifteen operational years, adverse residual visual effects would be reduced to a moderately significant level.</p> <p>In terms of noise, Chapter 11 Noise and Vibration of the Environmental Statement (Document Reference 6.2) [APP-064] concludes that properties at Marazanvose would experience a reduction in noise of 1-5dB(A) with the scheme, as a result of the new A30 being further from the properties, and because there would be substantially less traffic on the existing A30.</p> <p>The noise reductions at Marazanvose would occur within Noise Important Area 3291 (i.e. reductions within a residential area of currently high noise exposure) with some of the noise reductions assessed as significant beneficial effects.</p> <p>To minimise the noise impacts through this section during construction, Best Practicable Means (BPM) in respect to controlling noise and vibration is assumed as incorporated mitigation within Annex K Outline Noise and Vibration Management Plan of the Outline CEMP Annexes (Document Reference 6.4) [APP-376]. This would include selection of quiet equipment, review of programme and methodology to consider quieter methods, appropriate location of equipment on site, control of working hours and the provision of acoustic enclosure screening where practicable.</p>
<p>The Parish Council requests that the closed section of the Shortlanesend road from St Fredas to Two Burrow Hill, which already forms part of the National Cycle Path (route no. 32), should be designated as a bridleway, making it safer for pedestrians, cyclists and horse riders to use.</p>	<p>As part of the Annex P Public Rights of Way Management Plan in the Outline CEMP Annexes (Document Reference 6.4) [APP-376] it is proposed that the National Cycle Network (NCN) continues to pass under the A30 via the Two Barrows underbridge. The route would then follow the realigned existing A30 west which would connect with the unnamed road C0364. The section of the unnamed road C0089 (Shortlanesend Road) to be closed would not be accessible from the realigned existing A30. The unnamed road C0089 would therefore only provide access to St Freda Nursery from the north via the unnamed road C0364.</p>

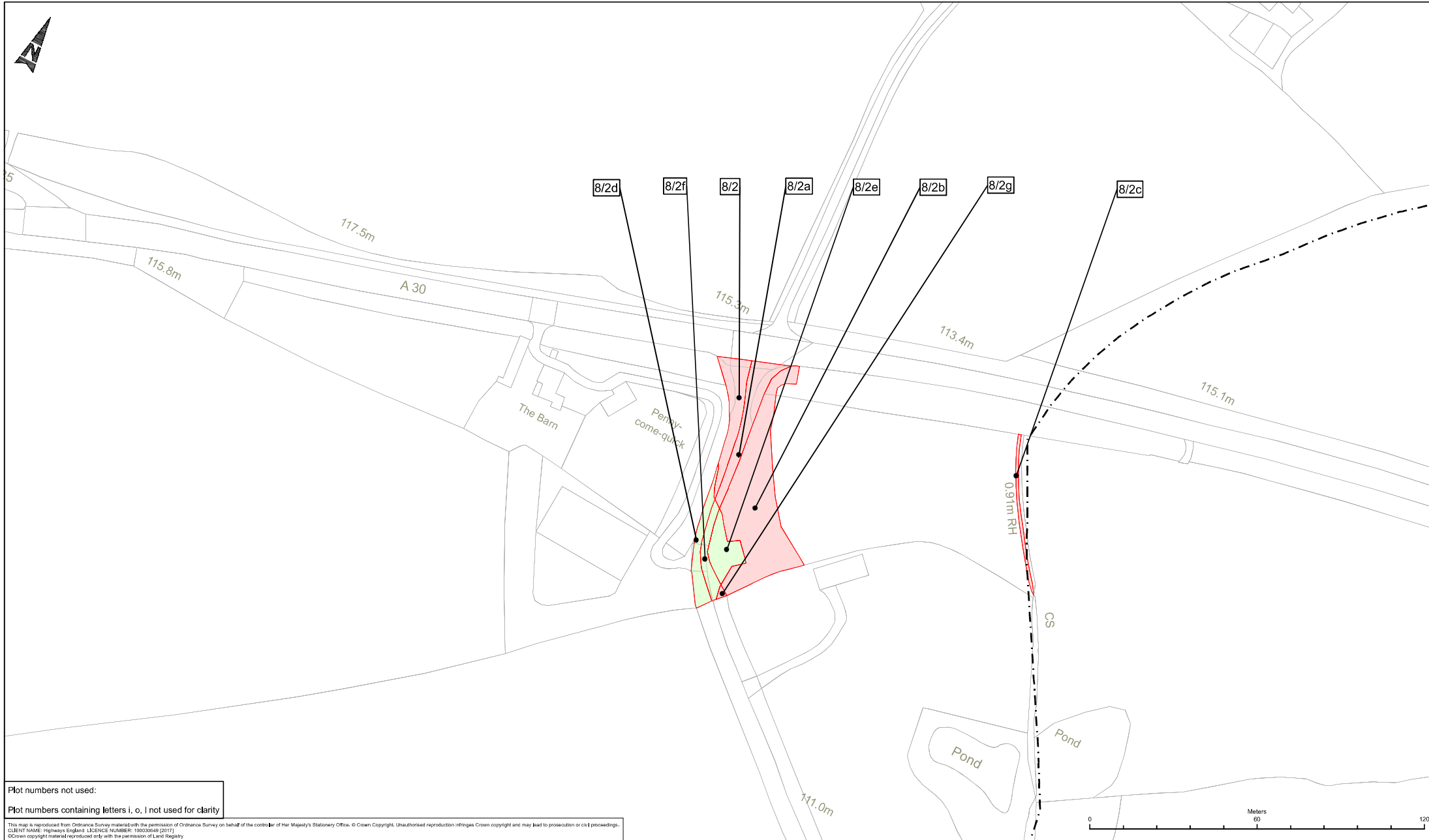
St. Allen Parish Council Written Representation	Highways England Response
	Access north-south for pedestrians, cyclists and horse riders would therefore not be available along the current C0089 (Shortlanesend Road) and instead users would follow the realigned NCN on the C0364.
<p>Mid-Section (incorporating Church Lane)</p> <ul style="list-style-type: none"> The Parish Council requests that the tunnel through Church Lane should be under both the new and the existing A30 and that both tunnels should be in line with each other and not staggered, creating a continuous route through Church Lane. The footpath crosses current A30, and is a potential accident blackspot. 	<p>Annex P Public Rights of Way Management Plan in the Outline CEMP Annexes (Document Reference 6.4) [APP-376] clarifies the underpass would be provided to link to the existing A30 crossing, to accommodate WCH movements.</p> <p>As set out on pages 87-88 of the Consultation Report (Document Reference 5.1)[APP-029], the Church Lane underpass is under the new A30 only. This would connect to the crossing of the existing A30, which would retain the stepped access. It is considered that this existing crossing is acceptable due to the significantly reduced traffic volumes predicted on the existing A30. Paragraph 12.11.59 of Chapter 12 People and Communities the Environmental Statement (Document Reference 6.2) [APP-065] concludes that there would be benefits to north/south movements as a result of the scheme, especially given improved traffic conditions.</p>
<ul style="list-style-type: none"> The Parish Council requests mitigation on the proposed laybys along this section of the A30 as it appears extra laybys have been added in and it would be inappropriate have lorries stopping overnight close to the built-up area, in particular one is now adjacent to the village of Zelah. The laybys should be removed or moved further along the A30. 	<p>The public lay-bys proposed along the new A30 are to provide safe locations for road users to stop if required. The locations of these lay-bys are governed by the requirements in the Design Manual for Roads and Bridges (DMRB) national design standards, which mandates maximum spacings and gives guidance on the most suitable horizontal and vertical geometry on the route. The locations have been selected in accordance with these standards and requirements.</p>
<p>East Section (incorporating Trevalso and Henvver Lane)</p> <ul style="list-style-type: none"> The Parish Council supports the Trevalso underpass, but it needs to be large enough for farm vehicles. The proposed U-bend design is unnecessary use of land and is aesthetically and environmentally 	<p>The proposed underpass at Trevalso Lane has been sized to accommodate the maximum legal articulated vehicles that can use the public road network and so would accommodate all normal farm vehicles fit for public roads.</p>

St. Allen Parish Council Written Representation	Highways England Response
<p>unattractive. A redesign would be desirable, while addressing the Henver Lane issues.</p>	<p>The new road layout proposed for Trevalso Lane and Henver Lane is required to maintain the connection of Trevalso Lane to the existing A30 and has sought to minimise land take as much as possible. The realigned Trevalso Lane would cross the new and existing A30 through an underpass and connect to Henver Lane, which would also be realigned to maintain its junction with the existing A30. This is the preferred layout for this junction as it maintains Henver Lane as a through-route to its connection to the existing A30, whilst facilitating its new junction with the realigned Trevalso Lane, as discussed and agreed with the adjacent properties on Henver Lane (see Appendix B of the Statement of Reasons (Document Reference 4.1)) [APP-006].</p> <p>The designed realignment provides the required separation between the Trevalso Lane underpass and the junction to allow acceptable vertical gradients and a required level area on the approach to the junction. This is Work No. 10 in the draft DCO (Document Reference 3.1(C)) and is shown on Sheet 6 of the Works Plans (Document Reference 2.4(B)).</p>
<ul style="list-style-type: none"> • The Parish Council considers Henver Lane currently has too much traffic. It needs urgent works to stop it being used as a rat run through the village. If issues with the A30 further west and at Boxheater were addressed, then this would allow Henver Lane to be used normally as a local road. Alternatively the Parish Council requests the closure of Henver Lane to vehicles. 	<p>Traffic modelling undertaken for the scheme shows a substantial decrease in traffic on the existing A30; two-way Annual Average Daily Traffic (AADT) on the existing A30 in 2038 would decrease from 27,849 vehicles (without the scheme) to 1,703 vehicles (with the scheme). This reduction in traffic would improve the ability of vehicles to join the existing A30 at the B3285/A30 junction at Boxheater and remove a significant amount of 'rat running' traffic on Henver Lane.</p> <p>It is proposed that monitoring would be undertaken for a period pre-construction, during construction and a 12-month post construction period to capture seasonal variation of traffic flows and this would inform the Cornwall Council decision on whether or not to close Henver Lane to through traffic.</p>

St. Allen Parish Council Written Representation	Highways England Response
<p>Although not part of the application, the Parish Council also supports the improvement of the A3075 from Trevemper roundabout to Boxheater, as this will provide a link to the local road at Boxheater, which would take traffic away from Henver Lane and allow it to be kept open.</p>	<p>Existing issues at Trevemper Roundabout are not relevant to the scheme.</p>
<p>Dear Sirs</p> <p>Further to St Allen Parish Council's submission sent to you on 18th February, it has been brought to the Parish Council's attention that the access to Chynoweth Farm is inadequate and needs addressing.</p> <p>The Parish Council has had multiple complaints of inadequate access to farms on the Shortlanesend road. Attached is a supporting letter from the Chynoweth Farm partnership, expressing their concerns.</p> <p>Yours faithfully</p> <p>Janet Ritchie Clerk to St Allen Parish Council</p> <p>Chynoweth Farm Partners</p> <p>We wish to raise concerns over the access to Chynoweth Farm Killivose St Allen, marked as B on the map. Currently access for our daily and weekly deliveries is via lane from A30 at Marazanvose, With the new road access will not be possible, Artic, Milk Tanker and Lowloader lorries will have to access farm from Zelah hill junction and follow road towards Shorlanesend to junction C on map. This road currently does not allow 2 cars to pass easily in places let alone lorries, plus the turn towards the Farm at C is too sharp and narrow for lorries, adjustments at this point will need to be under taken. Please could you confirm who is responsible for this work.</p> <p>Dear Sirs</p>	<p>As shown on Sheet 4 of the Rights of Way and Access Plans (Document Reference 2.5(B)), Kilivose Lane (U6082) is proposed to be stopped up. This lane is currently used to access Chynoweth Farm from a T-junction with the existing A30.</p> <p>To the south of Chynoweth Farm there is a junction with the Kilivose Lane (U6082) and the Shortlanesend Road (C0089). The current junction from the U6082 to the C0089 is not sufficient for use by HGVs and as shown as Work No. 75 on Sheet 4 of the Works Plans (Document Reference 2.4(B)), junction would be upgraded as part of the scheme to accommodate these vehicles. This would allow access to the existing A30 from Chynoweth Farm via the U6082 and the C0089.</p> <p>Meetings have been held with the Foote family on 7 December 2017 and 15 May 2018. The above arrangements for access to Chynoweth Farm were discussed at these meetings and agreed as the appropriate and acceptable solution.</p> <p>The green bridge at Marazanvose is proposed as a crossing facility for the local ecology and to connect the walking, cycling and horse riding routes in this area. However, as the structure would also be required to accommodate access for highway authority maintenance vehicles, it could accommodate the similar load of a tractor and trailer. Access for a tractor and trailer has been granted for the adjacent Nancarrow Farm to assist their access to their land on the opposite side of the existing and new A30. The new bridge would be subject to a strict weight limit and no access for heavy goods vehicles would be permitted.</p>

St. Allen Parish Council Written Representation	Highways England Response
<p>Regarding the proposed closing of the T Junction at Marazanvose south to Killivose and Chynoweth Farms. After long consideration we think the option left to us to travel all the way round to the Zelah junction on a totally unsuitable road is unacceptable given the size of our business and that of the Benaman R+D here based on our farm and the large amount of traffic generated by Killivose next door.</p> <p>We think rather than upgrading the wildlife bridge at Nancarrow Farm to carry private traffic is wrong, spending that amount of money should be for public use and access. Therefore a full overpass for Heavy traffic should be at the existing junction.</p> <p>Yours Faithfully, Chynoweth Farm Partners</p>	<p>Allowing heavy goods vehicular access for Chynoweth Farm to the new green bridge as requested would significantly increase the costs of the structure and this is not considered to have any significant journey time benefits for those vehicles. On this basis, the increased costs of the changes to the bridge could not be justified and the improvement works to the junction with C0089, for the diversion route to access the existing A30 via the C0089, has been proposed.</p>

Appendix C: Mr and Mrs Harvey Land Plan



Plot numbers not used:
 Plot numbers containing letters i, o, l not used for clarity

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LEGEND	
--- EXISTING FOOTPATH	LAND TO BE ACQUIRED
--- EXISTING BRIDLEWAY	LAND TO BE USED TEMPORARILY AND RIGHTS TO BE ACQUIRED PERMANENTLY
--- EXISTING BYWAY OPEN TO ALL TRAFFIC	LAND TO BE USED TEMPORARILY
--- PARISH BOUNDARY	

SAFETY, HEALTH AND ENVIRONMENTAL INFORMATION	
In addition to the hazards/risks normally associated with the types of work detailed on this drawing, note the following significant residual risks (References shall also be made in the design hazard log)	
Construction	NONE
Maintenance / Cleaning	NONE
Use	NONE
Decommission / Demolition	NONE

Rev	Date	Description	FG	MB	DG
P01	20/12/18	FIRST ISSUE			

Suitability	S2	Drawing Status	FIT FOR INFORMATION
Designer			
Client			

Project Title						A30 CHIVERTON TO CARLAND CROSS					
Drawing Title						LAND INTEREST PLAN PLOT: 8/2					
Scale						Please refer to the DCO application for the A30 Chiverton to Carland Cross for full details.					
1:1,250	Designed / Drawn	FG	Checked	MB	Approved	DG	Authorised	---			
Original Size	Date	20/12/18	Date	20/12/18	Date	20/12/18	Date	---			
Drawing Number	Project	HA551502-ARP-LLO-SW-DR-ZL-000681	Originator	Viz/No	Revision	P01					
Location	Type	Risk	Number								

TO BE READ IN CONJUNCTION WITH APPENDED TABLE HA551502-ARP-LLO-SW-SH-ZL-000120

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