

**A30 Chiverton to Carland Cross
TR010026**

**8.5 COMMENTS ON LOCAL IMPACT
REPORT**

Volume 8

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Table of Contents

	Pages
1 Introduction	1
1.1 Purpose of this document	1
1.2 Structure	1
2 Introduction and Terms of Reference	2
2.1 Overview	2
2.2 Specific comments	2
3 Site Description and Surroundings	3
3.1 Overview	3
4 Summary of Proposed Development	4
4.1 Overview	4
5 Pre-Application Process	5
5.1 Overview	5
5.2 Specific comments	5
6 Planning Policy Considerations	6
6.1 Overview	6
6.2 Specific comments	6
7 Statement of Common Ground	7
7.1 Overview	7
8 Assessment of Cumulative Effects of Other Projects	8
8.1 Overview	8
8.2 Specific comments	8
9 The Likely Environmental Effects of the Proposed Development	11
9.1 Overview	11
9.2 Specific comments	11
10 Landscape and Visual Impacts	12
10.1 Overview	12
10.2 Specific comments	12
11 Historic Environment including Archaeology	21
11.1 Overview	21
11.2 Specific comments	21
12 Access and Highways Considerations (including Route Selection)	22
12.1 Overview	22
12.2 Specific comments	22
13 Public Rights of Way	34
13.1 Overview	34
13.2 Specific comments	34

14	Surface Water Drainage	35
14.1	Overview	35
14.2	Specific comments	35
15	Minerals Safeguarding Issues	36
15.1	Overview	36
15.2	Specific comments	36
16	Scheme Benefits	38
16.1	Overview	38
16.2	Specific comments	38
17	Conclusion	39

Table of Tables

Table 10-1	Highways England comments on sections 9.2 and 9.3 of the LIR	12
Table 10-2	Highways England comments on sections 9.5 to 9.13 of the LIR	16
Table 10-3	Highways England comments on sections 9.15 to 9.17 of the LIR	20
Table 11-1	Highways England comments on section 10.1 of the LIR	21
Table 12-1	Highways England comments on access and highways considerations of the LIR	22
Table 13-1	Highways England comments on section 12.1 of the LIR	34
Table 15-1	Highways England comments on section 14.1 to 14.4 of the LIR	36

1 Introduction

1.1 Purpose of this document

- 1.1.1 This document sets out Highways England's (the Applicant) comments on the Local Impact Report (LIR) submitted by Cornwall Council to the Examination of the A30 Chiverton to Carland Cross scheme (the scheme). The LIR was submitted to the Examining Authority (ExA) at 'Deadline 1', 19 February 2019.
- 1.1.2 This document does not seek to respond to every element of the LIR but rather to focus on the pertinent points cited by Cornwall Council and respond to any important and relevant matters raised.

1.2 Structure

- 1.2.1 For ease of reference, this document is structured to replicate that of the LIR:

- Introduction and Terms of Reference
- Site Description and Surroundings
- Summary of Proposed Development
- Pre-Application Process
- Planning Policy Considerations
- Statement of Common Ground
- Assessment of Cumulative Effects of Other Projects
- The Likely Environmental Effects of the Proposed Development
- Landscape and Visual Impacts
- Historic Environment including Archaeology
- Access and Highway Considerations (to include response to Appendix A Highways and Transport including Route Selection)
- Public Rights of Way
- Surface Water Drainage
- Minerals Safeguarding Issues
- Scheme Benefits
- Conclusion

- 1.2.2 This document makes reference to matters which are already set out in the DCO application documents and the documents submitted at Deadline 1 of the Examination, including the **Statement of Common Ground between Highways England and Cornwall Council** (Document Reference 7.4) [REP1-003] and Highways England's **Comments on Relevant Representations** (Document Reference 8.1) [REP1-004].

2 Introduction and Terms of Reference

2.1 Overview

- 2.1.1 Highways England note the reference to the extensive pre-application consultation and the relatively few impacts considered to be subject to Examination as cited in paragraph 1.3 of the LIR.

2.2 Specific comments

- 2.2.1 Paragraph 1.2 of the LIR states:

“The Council understands Highways England will be the discharging authority for any conditions that may be imposed on the DCO although the Council understands it will become the Enforcement Authority for the scheme.”

- 2.2.2 To clarify, the Secretary of State for Transport would be the discharging authority for any approval required by a requirement of the **draft DCO** (Document Reference 3.1(C)). The procedure for discharge of requirements is set out in Part 2 of Schedule 2 of the draft DCO.

3 Site Description and Surroundings

3.1 Overview

- 3.1.1 Highways England considers that Section 2 of the LIR provides an appropriate summary of the site description and surroundings.

4 Summary of Proposed Development

4.1 Overview

- 4.1.1 Highways England considers that Section 3 of the LIR provides an appropriate summary of the proposed development.

5 Pre-Application Process

5.1 Overview

- 5.1.1 Highways England note and agree with the paragraph 4.1 of the LIR that:
“The Council has engaged positively with Highways England throughout the development of the project.”
- 5.1.2 This is evidenced in Table 2-1 of Section 2 (Consultation) of the **Statement of Common Ground between Highways England and Cornwall Council** (Document Reference 7.4(A)) [REP1-003] submitted at Deadline 1.

5.2 Specific comments

- 5.2.1 Paragraph 4.2 of the LIR refers to:
“Where there are any issues that are still outstanding, they have been identified in the Council’s Written Representations.”
- 5.2.2 Highways England is not aware of a Written Representation being submitted by Cornwall Council. As such, any points raised in the LIR (and Appendix) are addressed in this response by Highways England accordingly.

6 Planning Policy Considerations

6.1 Overview

- 6.1.1 Highways England and Cornwall Council are agreed on the appropriate policy framework as set out in items 1.5 and 1.6 of the **Statement of Common Ground between Highways England and Cornwall Council** (Document Reference 7.4(A)) [REP1-003] submitted at Deadline 1.

6.2 Specific comments

- 6.2.1 The National Planning Policy Framework (NPPF) was updated in February 2019, following the issue of the LIR. This is not considered to affect the assessment or consideration of the application; as in the previous version of the Framework (July 2018), it does not contain specific policies for nationally significant infrastructure projects (paragraph 5 of NPPF).
- 6.2.2 As noted in paragraph 5.3 of the LIR, at the time of the preparation of the application, the Minerals Safeguarding DPD had not yet been adopted. See Section 15 of this document for the response to points made by Cornwall Council on minerals.
- 6.2.3 In paragraph 5.4 of the LIR, it is stated that:
- “The Council is aware that for the purposes of the DCO process the National Policy Statement for National Networks (NPSNN) is relevant, and it understands the NPSNN and NPPF are consistent with each other insofar as this DCO application is concerned.”* [emphasis added]
- 6.2.4 The use of “is relevant” could be considered somewhat unclear. Section 104 of the Planning Act 2008 is clear, it establishes that:
- a) In deciding an application the Examining Authority must have regard to:
- any national policy statement;
 - any local impact report;
 - any matters prescribed in relation to development of the description to which the application relates; and
 - any other matters which the Panel or Council thinks are both important and relevant to its decision.
- b) The Examining Authority must decide the application in accordance with any relevant National Policy Statement (NPS), except where a limited number of specific circumstances apply. Section 104 provides that the duty would not apply where “the adverse impact of the proposed development would outweigh its benefits” (Section 104 sub-section 7).
- 6.2.5 Notwithstanding the points of clarification noted above, Highways England considers that the LIR provides an appropriate summary of the context for the assessment of a nationally significant infrastructure project (NSIP).

7 Statement of Common Ground

7.1 Overview

- 7.1.1 As referred to in paragraph 6.1 of the LIR, the **Statement of Common Ground between Highways England and Cornwall Council** (Document Reference 7.4(A)) [REP1-003] submitted at Deadline 1 (19 February 2019) represents the latest position between Highways England and Cornwall Council.
- 7.1.2 As also noted in paragraph 6.1 of the LIR, both parties are continuing to review the matters that are still subject to negotiation. The SoCG will be reviewed and updated during the Examination to reflect any additional agreement achieved and submitted to the Examining Authority (ExA) at the appropriate deadline.

8 Assessment of Cumulative Effects of Other Projects

8.1 Overview

- 8.1.1 Highways England discussed and agreed a list of projects to be scoped in and out of the assessment of cumulative effects as noted in paragraph 7.1 of the LIR.
- 8.1.2 A review has been undertaken for the additional four other developments which have been approved by Cornwall Council since the DCO application (including the Environmental Statement) was submitted to the Planning Inspectorate in August 2018.

8.2 Specific comments

- 8.2.1 Each project is taken in turn below and assessed against the methodology set out in Section 15.4 of **Chapter 15 Consideration of Cumulative Effects** of the Environmental Statement (Document Reference 6.2) [APP-068].

PA18/01865

- 8.2.2 This application is for the temporary change of use of land use to a campsite for 'Tunes in the Dunes' festival on 8 June to 10 June, to include preparation and clearance of the site from 4 June to 15 June 2018. Following a search of Cornwall Council's planning website, this application was determined to be for a temporary use in June 2018. Highways England understands that this festival is also being held in 2019 although no planning application for the 2019 event was identified through a search of Cornwall Council's planning website. Construction for the A30 Chiverton to Carland Cross scheme is proposed to begin in March 2020. Therefore, it is considered that there would be no cumulative effects with the scheme for 2019.
- 8.2.3 Should the festival require planning application in 2020, due to the small scale of the festival, and its location approximately 4km north of the A30, it is not considered there would be potential for significant cumulative effects.

PA17/11631

- 8.2.4 This is a retrospective planning application for the retention of a building for use as an agricultural dealership to include workshops, storage, a display area, office space and a conference facility which was partially constructed near Trewaters Farm, Trispen. The application was approved in April 2018 and Highways England understands that the project has been completed and is in operation.
- 8.2.5 The project is located approximately 1km south of Carland Cross from the proposed development.
- 8.2.6 On consideration of the operational impacts of the project with the scheme, it is not considered that it would give rise to significant cumulative effects and therefore has not been considered further for assessment as part of cumulative effects assessment methodology. The reasons for this include that the scale of the project is not of a nature to have significant effects on the receiving environment; the site is not located in a sensitive area; and traffic movements are not considered to be significant with up to 50 car movements and 20 tractor movements a day.

PA18/02740

- 8.2.7 This application is for the change of use of land for the siting of 41 no. caravans/lodges, the conversion and extension of existing maintenance building to spa facility with outdoor hydro pool, erection of gym and treatment pods, new maintenance building, re-grading of land, provision of amenity and recreation areas, internal road layout and associated landscaping. The project is located at Goonhaven approximately 2km from the scheme and was approved in August 2018.
- 8.2.8 Due to its location and development on greenfield, this project has been assessed as part of the methodology for potential significant effects on Nature Conservation, Landscape & Visual, and People and Communities. These topics fall within the Zone of Influence for potential cumulative effects with the proposed development (Table 15-6 of **Chapter 15 Consideration of Cumulative Effects** (Document Reference 6.2) [APP-068] sets out the Zone of Influence for each topic).

Nature Conservation

- 8.2.9 The application proposes to create 41 caravans/ lodges within existing arable land, and creation of grassland, native woodland, Cornish bank and hedge planting and amenity green space. No hedgerows are proposed to be removed.
- 8.2.10 The site is not located within any designated sites and no potential effects are anticipated on European Designated sites located 2.5 km from the project. No cumulative effects during construction and operation on designated sites are anticipated.
- 8.2.11 The main loss of habitat of this project is arable land which has been defined as negligible ecological importance. Some loss of scrub, grassland and ruderal vegetation will be required however it is not considered as having a significant negative effect. Moderate adverse effects have been identified for habitat loss during construction, reducing to moderate beneficial once landscape planting has established. Based on the scale and nature of the caravan and spa project, and the distance from the A30 scheme, the cumulative effects are not considered to change from those identified in the A30 cumulative assessment during both construction and operation for habitats.
- 8.2.12 Bats have been identified foraging within the application site however no significant effects were identified. Moderate adverse significance of effect has been identified for bats during construction of the A30 due to the temporary severance and fragmentation of foraging and commuting features. If the construction stages of the two schemes do overlap, the overall cumulative effect is not likely to be more than a moderate adverse effect on bat populations from loss of foraging and commuting habitat.

Landscape and Visual

- 8.2.13 The project is an extension to an existing holiday park on the southeast edge of Goonhaven. It lies on land with a northerly aspect facing away from the scheme. This project would have no direct concurrent visual connection with the scheme. This project and the A30 scheme would be sequentially visible to road users at either end of a 2km journey along the B3285 between Boxheater junction and Perran Springs.

8.2.14 This project sits 2km to the north of the scheme on the northern edge of the Newlyn Downs Landscape Character Area, through which the scheme passes. In combination, this project and the A30 scheme would lead to a slight degradation to the otherwise rural character of this landscape. However, the project and the A30 scheme are visually separated, 2km apart and very different in form and nature. Any cumulative change to the character of the landscape would be indirect and low level. Low level change to a moderately sensitive landscape would therefore not result in significant cumulative landscape effects.

People and Communities

8.2.15 The nature of the project is unlikely to give rise to significant effects due to its small-scale expansion of an existing caravan park. The location of this project with the proposed development means that cumulative effects on all travellers are unlikely and should these occur it is considered they would not be significant. Similarly, no cumulative effects are predicted on any of the tourism and recreation receptors identified and considered as part of the Environmental Statement and therefore potential cumulative effects on land and property receptors of relevance are not considered to be significant.

PA18/07626

8.2.16 This project is for the proposed erection of 13 dwellings, the formation of a new vehicular access, the provision of an internal access road and the installation of a sewage treatment plant at Summercourt. The project is located approximately 5km north east of the proposed development and is pending approval.

8.2.17 It is not considered that there would be potential for significant cumulative effects for further assessment. The site is located within a brownfield site with existing hardstanding and bare ground. No ecological features were identified, and it is not within a sensitive area. The site is also within an existing settlement and adjacent to the dualled section of the A30, north of the scheme. It is not considered that there would be significant cumulative effects during construction and operation due to the small-scale nature of the housing development.

Summary

8.2.18 Overall, Highways England has reviewed and considered the major planning applications that have been granted planning permission by Cornwall Council since the DCO was submitted in August 2018. It is considered that there would not be any cumulative effects arising.

9 The Likely Environmental Effects of the Proposed Development

9.1 Overview

9.1.1 Highways England note paragraph 8.2 of the LIR, in that Cornwall Council consider that for the following topics the issues and impacts have been satisfactorily addressed and proposed mitigation is adequate:

- a) World Heritage Site
- b) Biodiversity
- c) Noise and Vibration
- d) Air Quality
- e) Contaminated land
- f) Geology, Soils and Agricultural land
- g) Socio-economic Impacts

9.1.2 As such, there are no matters to respond to or comment on with regards to the topics above and they are not considered any further in this document.

9.2 Specific comments

9.2.1 Highways England note paragraph 8.3 of the LIR and the request for further information and/or clarification of the following topics:

- a) Landscape and Visual Impacts
- b) Historic Environment including Archaeology
- c) Access and Highway Considerations
- d) Public Rights of Way
- e) Surface Water Drainage
- f) Cumulative Effects
- g) Minerals Safeguarding Issues

9.2.2 The points raised for each of the topics listed above is considered in turn within the remainder of this document. As noted in paragraph 8.4 of the LIR, Highways England will continue to progress and discuss the responses to these matters with Cornwall Council.

10 Landscape and Visual Impacts

10.1 Overview

10.1.1 There are a number of landscape and visual matters agreed between Cornwall Council and Highways England as set out in references 8.1 – 8.5 of Table 4.1 (Matters agreed between Cornwall Council and Highways England) in the **Statement of Common Ground between Highways England and Cornwall Council** (Document Reference 7.4(A)) [REP1-003].

10.2 Specific comments

Landscape and Visual Impact Assessment

10.2.1 For ease of reference, the Highways England comments on points raised by Cornwall Council in relation to Landscape and Visual Impacts have been tabulated below.

Table 10-1 Highways England comments on sections 9.2 and 9.3 of the LIR

Paragraph	Text from LIR	Highways England response
9.2	<i>In terms of Chapter 7 of the ES at para 7.3.13 it is requested that reference is made to the Cornwall Planning for Biodiversity Guide October 2018 which supersedes the document referenced in the text.</i>	Reference to the 2017 Guidance was correct at the time of carrying out the baseline work. It was an oversight not to update this. Reference will be made to the 2018 version and will be provided to the Examination in an Environmental Statement Addendum.
	<i>At para 7.7.37 Table 7-5 it is questioned whether all Cornish hedges would be closely flailed and that some will 'close grow' due to the elevated exposed local topography.</i>	The reference to Cornish hedges being 'mostly closely flailed' is paraphrased from the ' <i>Cornwall and Isles of Scilly Landscape Character Study, Landscape Character Area Description for LCA 14 Newlyn Downs</i> ', which states under Biodiversity that: <i>'These semi-natural habitats are linked by a network of Cornish hedges, which, in the more intensively farmed areas, are closely flailed, and without mature trees in the more exposed parts'.</i> Notwithstanding this, it is agreed that some of these hedges may not be flailed but could be close grown due to the elevated exposed local topography.

Paragraph	Text from LIR	Highways England response
	<p><i>At tables 7-2 to 7-5 further explanation is requested to clarify how the value ratings have been created by the applicant, and whether or not they are taken from the Landscape Character Assessment. Please provide the criteria as to how the value ratings have been reached.</i></p>	<p>The value of these Character Areas was assessed using professional judgement based on extensive field work and reference to the relevant Landscape Character Area Descriptions and the Landscape Description Units in the '<i>Cornwall and Isles of Scilly Landscape Character Study</i>'. These published studies do not define the sensitivity or the value of the character areas.</p> <p>The value categories are described in the methodology section at Para 7.6.6 of Chapter 7 Landscape of the Environmental Statement (Document Reference 6.2) [APP-060].</p> <p>Using professional judgement, in line with paragraphs 5.19 to 5.31 of the Guidelines for Landscape and Visual Impact Assessment (GLVIA3), the value of landscape (and visual) receptors has been assessed on a receptor by receptor basis. As per Paragraphs 5.20 and 5.26 to 5.29 of GLVIA3, the assessment of value of landscape receptors considered a range of factors. This is set out in Tables 7-2 to 7-5 of Chapter 7 Landscape of the Environmental Statement (Document Reference 6.2) [APP-060].</p> <p>In line with paragraph 5.29 of GVLIA3, these factors were chosen based on the assessor's experience, informed by the nature of the local landscape and to an extent aligned to the categories in the Landscape Character Area Descriptions in the '<i>Cornwall and Isles of Scilly Landscape Character Study</i>'.</p>
9.3	<p><i>At para 7.7.90 it is questioned whether the attention of most of the road users will be 'absorbed in navigating the roads'. This statement does not allow for passengers in the vehicles and for the A30 and other roads to be used by tourists and visitors to the area who may have a greater interest in the landscape than those on their daily commute.</i></p>	<p>The experience of people in cars is detached somewhat from the landscape and views, by virtue of being enclosed within a car travelling through the landscape along a busy or fast road, or a country lane typically with tall hedges.</p> <p>For this assessment it was assumed that the majority of car journeys are made by the driver alone and are not made for recreational purposes.</p> <p>This was not expressly stated in Chapter 7 Landscape of the Environmental Statement (Document Reference 6.2) [APP-060] but the typical visual sensitivity criteria for road users is provided at</p>

Paragraph	Text from LIR	Highways England response
		<p>Table 7-4 in Appendix 7.1 Landscape and Visual Assessment Criteria (Document Reference 6.4) [APP-325] are:</p> <p><i>“Medium - Users of scenic roads, railways or waterways or users of designated tourist routes.”</i></p> <p><i>“Low - Users of main roads (e.g. trunk roads) or passengers in public transport on main arterial routes”</i></p> <p>GVLIA3 states at paragraph 6.33 that:</p> <p><i>‘travellers on road, rail or other transport routes tend to fall into an intermediate category of moderate susceptibility to change. Where travel involves recognised scenic routes awareness of views is likely to be particularly high.’</i></p> <p>There are of course exceptions to the assumptions and typical criteria above. For this assessment, the exception taken account of is for people driving on quiet lanes, where there is more likely to be a recreational element to their journey. These receptors are represented by VPs 23 and 31 in Table 7-8 in Chapter 7 Landscape of the Environmental Statement (Document Reference 6.2) [APP-060]). In both of these cases, visual sensitivity is assessed as moderate because although designated routes, views out of the surrounding landscape are typically restricted to glimpses through gaps in tall roadside hedgerows.</p>

Viewpoints

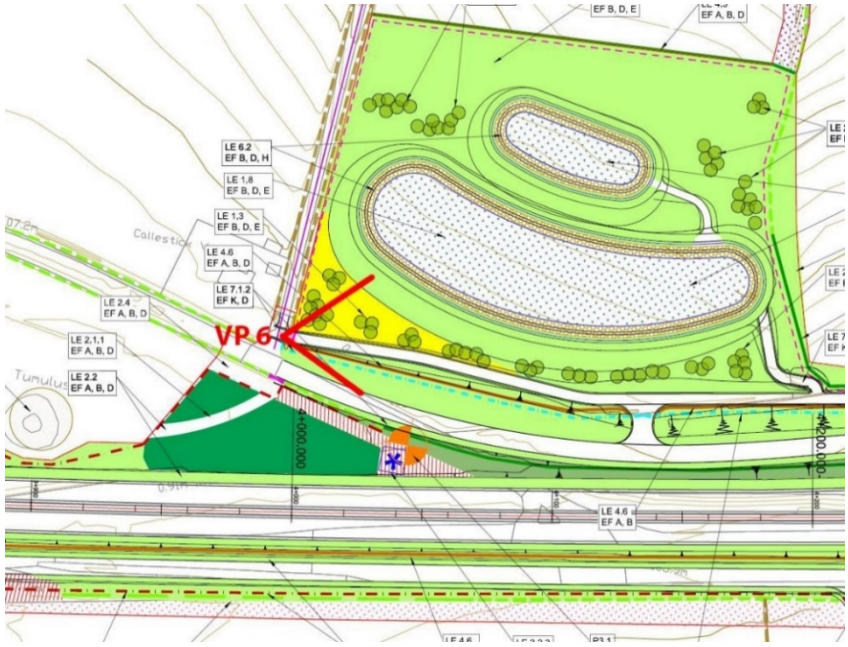
10.2.2 At paragraph 9.4 of the LIR, Cornwall Council provide comments on the visualisations presented in **Environmental Statement Figure 7.5 – Photosheets** (Document Reference 6.3) [APP-179]. It is stated at Paragraph 7.6.33 of **Chapter 7 Landscape** of the Environmental Statement (Document Reference 6.2) [APP-060] that:

‘the photographs provide an illustrative tool for assessment that can be compared with an actual view in the field.’

10.2.3 Visualisations are verified and dimensionally accurate, but the colouring and textural rendering is intended to give an indicative artists impression of how the scheme may look.

10.2.4 For ease of reference, the Highways England comments on the points raised by Cornwall Council in relation to specific viewpoints have been tabulated below.

Table 10-2 Highways England comments on sections 9.5 to 9.13 of the LIR

Paragraph	Text from LIR	Highways England Response
9.5	<p><i>VP4 – at 1 and 15 years. It is queried if vehicles would be able to be seen from here. Please could they be superimposed onto these scheme completion photos.</i></p>	<p>In this view the proposed carriageway is in a slight cutting, just less than 1m deep, between two proposed 1.2m high Cornish hedges. The viewer might just be able to see the tops of car roofs and would be able to see the upper half of lorries. High sided lorries might just break the skyline between the wooded areas on the distant horizon. It is not proposed to update these visualisations to include vehicles.</p>
9.6	<p><i>VP6 – winter view at year 15 – would the Cornish hedge in the right of the picture not be planted with trees and shrubs, therefore these would have grown on in this image? Please be advised for clarification that Figure 7.6 Environmental Masterplan 6 appears to show this boundary as a native species hedge (LE4.3) and not a Cornish hedge.</i></p>	<p>The hedgerow to the right of this view is correctly shown as an unplanted 1.2m Cornish hedgerow. When cross referring to the Environmental Masterplan, the VP looks down the private accommodation track to include the distant parts of the scheme:</p>  <p>The diagram is a site plan showing various landscape features. A red arrow points to a location labeled 'VP 6'. The plan includes several hedges and tracks, with labels such as 'LE 6.2 EF B, D, H', 'LE 1.8 EF B, D, E', 'LE 1.3 EF B, D, E', 'LE 4.6 EF A, B, D', 'LE 7.12 EF K, D', 'LE 2.4 EF A, B, D', 'LE 2.11 EF A, B, D', 'LE 2.2 EF A, B, D', 'LE 4.8 EF A, B', 'EF B, D, E', 'EF A, B, D', 'LE 1', 'LE 2', 'LE 7', 'LE 8', 'LE 9', 'LE 10', 'LE 11', 'LE 12', 'LE 13', 'LE 14', 'LE 15', 'LE 16', 'LE 17', 'LE 18', 'LE 19', 'LE 20', 'LE 21', 'LE 22', 'LE 23', 'LE 24', 'LE 25', 'LE 26', 'LE 27', 'LE 28', 'LE 29', 'LE 30', 'LE 31', 'LE 32', 'LE 33', 'LE 34', 'LE 35', 'LE 36', 'LE 37', 'LE 38', 'LE 39', 'LE 40', 'LE 41', 'LE 42', 'LE 43', 'LE 44', 'LE 45', 'LE 46', 'LE 47', 'LE 48', 'LE 49', 'LE 50', 'LE 51', 'LE 52', 'LE 53', 'LE 54', 'LE 55', 'LE 56', 'LE 57', 'LE 58', 'LE 59', 'LE 60', 'LE 61', 'LE 62', 'LE 63', 'LE 64', 'LE 65', 'LE 66', 'LE 67', 'LE 68', 'LE 69', 'LE 70', 'LE 71', 'LE 72', 'LE 73', 'LE 74', 'LE 75', 'LE 76', 'LE 77', 'LE 78', 'LE 79', 'LE 80', 'LE 81', 'LE 82', 'LE 83', 'LE 84', 'LE 85', 'LE 86', 'LE 87', 'LE 88', 'LE 89', 'LE 90', 'LE 91', 'LE 92', 'LE 93', 'LE 94', 'LE 95', 'LE 96', 'LE 97', 'LE 98', 'LE 99', 'LE 100'. The plan also shows a 'Collection' track and a 'Tumulus'.</p>

Paragraph	Text from LIR	Highways England Response
9.7	<p><i>VP12 – winter view year 1 – the Council questions whether close board fencing is appropriate to the southern side of the road. A planted Cornish hedge would be more appropriate in terms of character and visual impact. For reference this boundary treatment is also shown in VP13 winter year 1, and VP15 winter view year 1.</i></p>	<p>The choice of a 3m high close boarded fence to the south of the scheme between Ch 6,800 and 7,500 was in order to provide noise and visual screening at the top of the cutting slope for receptors to the south. An alternative using a 1.8m Cornish hedge on a 1.2m bund (false cutting) above the real cutting was previously considered in this location. Through engagement with the affected landowner, the more ‘space-hungry’ Cornish hedgerow option was discounted in favour of the taller timber fence, in order to reduce land take from the farm.</p> <p>The landscape mitigation design at Sheet 10 of the Environmental Masterplans (Document Reference 6.3) [APP-190] shows the scrub and woodland planting to the north of this fence and woodland to the south, which is intended to break up, filter and eventually screen views of the fence from receptors to the south, from Marazanvose and the scheme to the north (see VP 12 and 13, Winter Yr 15).</p> <p>It is considered that the proposed solution, comprising a fence with landscape mitigation, offers the best balance between aesthetics and mitigation function.</p>
9.8	<p><i>VP16 – winter view year 1 and year 15, the Council notes that it is usual in Cornwall to have some form of boundary treatment to a road, usually in rural areas a Cornish hedge or post and rail fence.</i></p>	<p>The nearest road in this view is a private lane way for access to Chyverton Park. Where possible the existing overgrown roadside hedgerow would be retained. The exact extent of this retention is not known at this stage, so for caution this has been shown as removed in the visualisation. The arrangement of boundaries in this location is shown more legibly on Sheet 11 of the Environmental Masterplans (Document Reference 6.3) [APP-190].</p>
9.9	<p><i>VP24 – Would earth mounding as a minimum be beneficial along the edge of the new road if the Historic Environment do not want Cornish hedges? The Council had asked for the hedges to be moved to the tops of the banks in its comments of 23 July 2018, emailed to Ben Oakman (BO). It does not appear this has happened. The Council had also requested further tree planting between the two roads which would decrease as you moved nearer to the heathland landscape character type around Carland Cross.</i></p>	<p>In this location the scheme is on embankment. Earth mounding at the top of this embankment would considerably increase the footprint of the scheme and the requirement for fill material.</p> <p>A feature of this area is the open and expansive nature of views southwards, the design intent here was to retain open views across the landscape as much as possible from the existing A30 and from dwellings to the north as well as from the proposed route. The proposed hedges are used to delineate and visually rationalise the</p>

Paragraph	Text from LIR	Highways England Response
		extent of the highway soft estate and provide a maintenance boundary. The scattered trees planting is to break up and soften views of the road whilst retaining distant views.
9.10	<i>VP27 – winter view year 1 – please be advised that the Council does not consider this is how a year one heathland would look, it would not be lush and green like this. It is more likely to be bare earth with some gorse and small tufts of heather.</i>	Noted. As stated at paragraph 7.6.33 of Chapter 7 Landscape of the Environmental Statement (Document Reference 6.2) [APP-060]: <i>‘the photographs provide an illustrative tool for assessment that can be compared with an actual view in the field.’</i> Visualisations are verified and dimensionally accurate, but the colouring and textural rendering is intended to give an indicative artists impression of how the scheme may look.
9.11	<i>VP27 – winter view year 15 – the Council considers that unless there is intensive management, the year 15 view would have gorse bushes within the heather so it would not all be ground cover plants.</i>	Noted. As stated at paragraph 7.6.33 of Chapter 7 Landscape of the Environmental Statement (Document Reference 6.2) [APP-060]: <i>‘the photographs provide an illustrative tool for assessment that can be compared with an actual view in the field.’</i> Visualisations are verified and dimensionally accurate, but the colouring and textural rendering is intended to give an indicative artists impression of how the scheme may look.
9.12	<i>VP27 – winter view year 1 and 15 – the Council considers that a Cornish hedge with grass top would be preferable to a post and rail fence.</i>	A badger fence is required in this location to prevent badgers accessing the operational scheme. In addition to this, a wall would affect the movement of invertebrates and would further interrupt the visual setting of the Carland Cross barrow cemetery. The boundary passes immediately adjacent to a scheduled barrow at Ch 12,880. A retaining wall is proposed here to avoid direct effects on the barrow. Adding a Cornish hedge to this arrangement would either directly impact on the barrow or would require moving the main alignment north, which worsens the conflict with the quarry pond at Ch 12,700 and would increase the height of the embankment approaching Carland Cross.

Paragraph	Text from LIR	Highways England Response
9.13	<i>VP30 – drawing Figure 7.6 Environmental Masterplan 2 of 20 shows a Cornish hedge which would be planted (LE 4.8). Therefore the 15 year winter view should not then show a flat topped hedge, as vegetation would obscure this. Figure 7.6 Environmental Masterplan 2 of 20 also shows woodland edge scrub to the slope below the hedge, so after 15 years the hedge would more than likely be completely obscured from this view</i>	Both the year 1 and the year 15 visualisations show a planted hedge with whips in year 1 and with a scrubby hedge in year 15. These are both winter views and so the vegetation is shown out of leaf and thus only filters rather than screens views.

Landscape Design

10.2.5 For ease of reference, the Highways England comments on the points raised by Cornwall Council in relation to landscape design, as depicted in the **Environmental Masterplans** (Document Reference 6.3) [APP-180-200], have been tabulated below.

Table 10-3 Highways England comments on sections 9.15 to 9.17 of the LIR

Paragraph	Text from LIR	Highways England Response
9.15	<i>Plan 1 - the Council requests that vegetation on the 'old' roundabouts be retained so far as practicable in terms of providing landscape benefits but also in providing an interpretative 'link' in understanding the previous road layout. For areas where vegetation is proposed to be lost the relevant areas should be shown as an extension of the proposed native deciduous woodland with a woodland edge scrub.</i>	The red cross hatch on the northern third of the existing Chiverton Cross roundabout indicates vegetation to be protected and retained. The scheme's main line carriageway and a slight cutting (1.5 m deep) mean that unfortunately the southern two thirds of this vegetation would need to be removed. A line of woodland and scrub along the scheme's northern cutting slope ties into this remnant roundabout woodland and would provide screening in views from the north.
9.16	<i>Plan 2 - the Council notes that tree planting has been removed from the areas between roads to the south east of the multi species crossing. Deciduous native planting is requested here.</i>	It is assumed this reference is to the crossing at Ch 1,200 and to the area of species rich grassland to the east and north east (north point not vertical up the page). This area could not be planted due to a forward visibility splay required for the A390 slip road.
9.17	<i>Plan 3 - the Council considers that post and rail fences on the top of elevated banks are not encouraged and would give rise to a landscape and visual impact and should be replaced with a suitable alternative.</i>	Sheet 3 of 20 of the Environmental Masterplans (Document Reference 6.3) [APP-183] shows only one short length of badger fencing at the top of an embankment along the off-slip to the east of Ch 1,600. This embankment is less than 1m in height and in reality, through detailed design would be graded out gently to tie into the landscape north of Trevisson Park.

11 Historic Environment including Archaeology

11.1 Overview

11.1.1 A response to the points raised in paragraph 10.1 of the LIR can be addressed by references to documents submitted with the application.

11.2 Specific comments

11.2.1 For ease of reference, the Highways England comments on the points raised by Cornwall Council have been tabulated below.

Table 11-1 Highways England comments on section 10.1 of the LIR

Paragraph	Text from LIR	Highways England Response
10.1	<i>That a standard archaeological recording Condition be imposed along the easement of the new A30, in accordance with the evidence provided in the ES and assessments</i>	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.
10.1	<i>That a Method Statement be provided describing the removal and reinstatement of milestones on the old A30 alignment where necessary, also in accordance with the evidence provided in the ES.</i>	Annex J of the Outline CEMP Annexes includes a Milestone Protection Management Plan (Document Reference 6.4) [APP-376], which provides a detailed methodology to protect the two historic carved milestones which would be affected by the A30 Chiverton to Carland Cross scheme.

12 Access and Highways Considerations (including Route Selection)

12.1 Overview

12.1.1 The section provides a response to Section 11 (Access and Highways considerations) and Appendix A (Highways and Transport including Route Selection) of the LIR.

12.2 Specific comments

12.2.1 Sections A1 'Cornwall Council Policies' and A2.1 – A2.14 'Key Local Issues' of the LIR are noted.

12.2.2 For ease of reference, the Highways England comments on the remainder points raised by Cornwall Council have been tabulated below:

Table 12-1 Highways England comments on access and highways considerations of the LIR

Paragraph	Text from LIR	Highways England Response
A2. 15.	<p>Shortlanesend</p> <p><i>With the provision of a grade separate junction at Chybucca, albeit with only west facing slips, the B3284 will become a more attractive route into central Truro for many commuters using the A30 from the west of Chiverton. As illustrated in Figure A2.1 below [see LIR for figure] the strategic traffic modelling indicates there will be a significant increase in traffic levels on the B3284 through Shortlanesend.</i></p>	<p>As noted in the LIR, the scheme does result in a significant increase in traffic passing through Shortlanesend, as this becomes a more attractive route to the centre of Truro due to journey time savings. The route via Shortlanesend provides an alternative to the A390 for those travelling from the west of Chiverton to Truro.</p> <p>Although there is an increase in traffic through Shortlanesend, the overall benefits of the scheme, both locally and strategically, are significant. These benefits include:</p>
A2. 16.	<p><i>The chart shows that for the busiest afternoon peak period the current 2 way flows of around 750 vehicles per hour (vph) through Shortlanesend would increase to 1150vph (55% increase) at scheme opening, rising further to 1300vph (74% increase) by 2038. Whilst these future predicted flows are within the theoretical link capacity for the B3284, it is the Council's view that this level of increase will have a significant detrimental impact on the centre of the village.</i></p>	<ul style="list-style-type: none"> a) reduced traffic flow on the existing A30 and other local roads; b) reduced east-west journey times on the A30 between Chiverton and Carland Cross (of up to seven minutes in 2038); c) reduced north-south journey times (e.g. between Truro and Newquay); d) improved journey time reliability; and e) reduced number of accidents. <p>All of these benefits combined would result in reduced congestion and would have a positive impact on the wider economics of the area.</p>

Paragraph	Text from LIR	Highways England Response
A2. 17	<p><i>The section of the B3284 through Shortlanesend already benefits from range of traffic management measures, including controlled and uncontrolled pedestrian crossings, junction improvements and speed activated signs to reinforce the 30mph limit through the village.</i></p> <p><i>These measures have to a large degree addressed previous road safety and speeding issues; however the predicted increase in traffic levels could lead to an increase in the number of accidents and community severance.</i></p>	<p>As part of the economic appraisal, COBA-LT road traffic accident analysis was undertaken of the highway network to assess the impact the scheme has on accidents. The B3284 through Shortlanesend was included in the assessment. It showed that with the increase in the traffic levels at Shortlanesend, there would be an increase in the number of accidents as a result of the scheme. However, the main increase would be in 'damage only' accidents where no person suffers an injury for which they can be admitted to hospital for treatment.</p>
A2. 18.	<p><i>The Council have requested that Highways England fund monitoring of the traffic flows through Shortlanesend, prior to and during construction and post scheme opening. Further work and ongoing consultation is required to identify appropriate mitigation measures to address these future potential impacts. This includes a review of the Truro Transport strategy to take into account the strategic and practical implications of the new scheme, alongside other major changes to west and central Truro and the wider highway network that could have a bearing on traffic flows through Shortlanesend.</i></p>	<p>As noted in the LIR, Shortlanesend already benefits from a range of traffic management measures, such as controlled and uncontrolled pedestrian crossings, junction improvements and speed activated signs to reinforce the speed limit through the village. As stated in the LIR, the measures are considered by Cornwall Council to have addressed previous road safety and speed issues and they are considered by Highways England to remain appropriate for the increased future traffic levels predicted with the scheme.</p> <p>Highways England agree to fund monitoring of traffic through Shortlanesend to inform any further measures required. This is recorded in reference 19.3 in Table 4.1 'Matters Agreed' of the Statement of Common Ground between Highways England and Cornwall Council (Document Reference 7.4(A)) [REP1-003] submitted at Deadline 1 (19 February 2019).</p>
A2. 19.	<p><i>The triggers for further measures are still to be agreed but the Council is seeking that any appropriate measures to reduce traffic levels and speeds through the village, and improve the crossing facilities for local residents, would be funded by Highways England.</i></p>	<p>It is proposed that the B3284 through Shortlanesend is monitored for a period prior to construction starting, for the period during construction and then for a 12-month period once the scheme is open to traffic. Undertaking a 12-month monitoring exercise post-construction would mean that traffic flow data is collected across all seasons and would therefore provide information on the seasonal variation of traffic flows, as well as variations between weekdays and weekends.</p> <p>Any further measures funded by Highways England would be limited to within the existing B3284 corridor and could include improvement to the gateways to the village to further attempt to slow traffic, such as narrowing the</p>

Paragraph	Text from LIR	Highways England Response
		carriageway, additional road markings and/or rumble strips. This is also recorded in reference 19.3 in Table 4.1 'Matters Agreed' of the Statement of Common Ground between Highways England and Cornwall Council (Document Reference 7.4(A)) [REP1-003].
A2. 20.	<p>Henver Lane</p> <p><i>Henver Lane has the potential to become a rat run as a link from the B3285 to the existing A30 at Zelah which in turn could encourage through traffic to use inappropriate back lanes through to Shortlanesend.</i></p>	Highways England understands the concern of Cornwall Council and residents of Henver Lane. However, 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 will 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.
A2. 21	<p><i>It is recognised that Henver Lane should remain open until the opening of the new scheme to facilitate construction. Cornwall Council will monitor traffic movements on Henver Lane before, during and after construction of the scheme and will implement measures (such as closure or partial closure) depending on the outcome of this monitoring. This includes consultation with local residents as required, potential works to enable closure, and the statutory process to implement necessary measures for prohibiting vehicles. This process and associated works would be funded by Highways England.</i></p>	<p>Highways England agree that Henver Lane should remain open until the opening of the scheme to facilitate construction. Highways England agree to fund monitoring of traffic flows on and through Henver Lane. This is recorded in reference 19.2 in Table 4.1 'Matters Agreed' of the Statement of Common Ground between Highways England and Cornwall Council (Document Reference 7.4(A)) [REP1-003].</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.</p>
A2. 22	<p><i>Further analysis of the potential impact of this closure, alongside measures outlined in the de-trunking strategy below and on the wider network including Scotland Road and the A3075 is being undertaken by the Council. It is recognised that changes in one part of the network will have knock on impacts elsewhere, and that measures need to be considered holistically to determine the appropriate way forward.</i></p>	<p>Highways England recognises that Cornwall Council is undertaking further analysis of the impact of closing Henver Lane. Highways England agree to fund the total or partial closure of Henver Lane if deemed necessary by Cornwall Council.</p> <p>This is recorded in reference 19.2 in Table 4.1 'Matters Agreed' of the Statement of Common Ground between Highways England and Cornwall Council (Document Reference 7.4(A)) [REP1-003].</p>

Paragraph	Text from LIR	Highways England Response
A2. 23.	<p>Penstraze Lane</p> <p><i>Under the current proposals Penstraze Lane provides a potential rat run from the proposed Chiverton junction to the A390. Therefore Penstraze Lane will need to be monitored before, during and after the opening of the scheme.</i></p>	<p>Highways England agree to fund monitoring of traffic flows on Penstraze Lane. This is recorded in reference 19.1 in Table 4.1 'Matters Agreed' of the Statement of Common Ground between Highways England and Cornwall Council (Document Reference 7.4(A)) [REP1-003].</p> <p>It is proposed that monitoring would be undertaken for a period pre-construction, during construction and for a 12-month period following the opening of the scheme to capture seasonal variation of traffic flows.</p>
A2. 24.	<p><i>Depending on the outcome of the monitoring and future consultation with residents and stakeholders it may be necessary to restrict access from Penstraze Lane to the existing A30 for all vehicles other than for access to residential properties and walkers, cyclist and horse riders (WCH) users.</i></p>	<p>No works on Penstraze Lane are planned as part of the A30 scheme. Highways England will fund works to stop up Penstraze Lane if deemed necessary by Cornwall Council. This is recorded in reference 19.1 in Table 4.1 'Matters Agreed' of the Statement of Common Ground between Highways England and Cornwall Council (Document Reference 7.4(A)) [REP1-003].</p>
A2. 25	<p><i>The monitoring and any resultant works (including consultation with local residents as required, potential works to enable closure, and the statutory process to implement necessary measures for prohibiting vehicles) will be carried out by Cornwall Council funded by Highways England if deemed necessary.</i></p>	
A2. 26.	<p>Walking, Cycling and Horse riders (WCH) provision for new scheme</p> <p><i>Cornwall Council accepts in principle that cyclists should not be permitted on the new scheme, and the number of WCH crossings of the new A30 at Chiverton junction, Marazanvose, Tolgroggan Farm and Church Lane is sufficient.</i></p>	<p>Noted. This agreement is captured in references 2.8 and 19.13 in Table 4.1 'Matters Agreed' of the Statement of Common Ground between Highways England and Cornwall Council (Document Reference 7.4(A)) [REP1-003].</p>
A2. 27	<p><i>The WCH provision at Chiverton has been the source of much discussion between the Council, Highways England and a local Cycle campaign group who have raised concerns over the approx. 70m underpass provided for WCH in the proposed Chiverton junction</i></p>	<p>Highways England consider that the proposed walking, cycling and horse riding underpass at Chiverton is the most appropriate grade separated crossing facility for the new A30 scheme at Chiverton junction. It is not considered by Highways England to be the 'minimum adequate facility' as described by Cornwall Council. It allows better connection between the other</p>

Paragraph	Text from LIR	Highways England Response
A2. 28	<p><i>The Council position is that we accept the underpass as the minimum adequate facility for WCH users that is an improvement over the existing situation, whilst also supporting the provision of a cycle footway bridge linking the B3277 to the A390 for the St Agnes to Truro cycle scheme being progressed separately to the main scheme.</i></p>	<p>side roads at the junction as well as the B3277 and A390, and it is also the most appropriate facility for all three users: walkers, cyclists and horse riders.</p> <p>Whilst this is not what was specifically requested by other parties such as Truro Cycling Campaign, the provision of an underpass ensures 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. Furthermore, the provision of a crossing for walkers, cyclists and horse riders away from the new Chiverton junction allows for the junction not to be lit. This minimises effects to the adjacent landowners, the local ecology and critical landscape and cultural heritage viewpoints across the junction.</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' of the Statement of Common Ground between Highways England and Cornwall Council (Document Reference 7.4(A)) [REP1-003].</p>
A2. 29.	<p><i>This separate scheme will be progressed by Cornwall Council and 90% funded by Highways England as part of their Cycling, Safety and Integration (CSI) Designated funds programme. This funding has been secured with the remaining 10% contribution from Cornwall Council and will be formally announced at media launch event on 20 February 2019. As this funding is essentially in place the Council is content to proceed with the cycle/ pedestrian bridge without any further obligations on the main scheme.</i></p>	Noted.
A2. 30	<p><i>As part of the design process we will be developing bridge design options to cover both scenarios, with and without the main scheme in place. Depending upon technical design considerations, the costs and how the forthcoming approvals for DCO and bridge planning permission fall into line the Council would then progress with the optimum option.</i></p>	Noted.
A2. 31	Lighting	

Paragraph	Text from LIR	Highways England Response
	<i>The Council supports the approach the HE design team have taken to minimise the street lighting of the new scheme, and will work with the team in detailed design phase to rationalise street lighting at the interface between the trunk road and County Highway network.</i>	The lighting strategy for the new A30 and local road and walking, cycling and horse riding network have been agreed with Cornwall Council. This is recorded in reference 2.4 in Table 4.1 'Matters Agreed' of the in the Statement of Common Ground between Highways England and Cornwall Council (Document Reference 7.4(A)) [REP1-003].
A2. 32	<i>The provision of activated pedestrian lighting for the Chiverton WCH underpass is supported.</i>	
A2. 33	Signage for main scheme <i>Signage at the proposed Carland Cross from westbound approach will include a route to Perranporth and Goonhavern incorporating using the existing A30. This will be carried out by Highways England as part of the construction of the main scheme.</i>	Highways England agrees that the new A30 scheme destination signage for westbound traffic at the Carland Cross junction will include signage for Perranporth and Goonhavern as part of the signage strategy. This is recorded in reference 19.7 in Table 4.1 'Matters Agreed' of the in the Statement of Common Ground between Highways England and Cornwall Council (Document Reference 7.4 (A)) [REP1-003].
A2. 34.	<i>In line with its policies on promoting the Cornish language the Council has requested that junction names on the 3 main junction map signs on the new ssare provided in both English and Cornish as follows:</i> <i>o Chiverton (Cross) = (Krowsfordh) Chi war Donn</i> <i>o Chybucca = Chibogh</i> <i>o Carland (Cross) = (Krowsfordh) Bowdir</i>	Traffic signs must either be prescribed by Traffic Signs Regulation and General Direction (TSRGD) or specially authorised by the Department for Transport (DfT). Signs that are neither prescribed or authorised are obstructions on the highway and would be removed. Bilingual signs incorporating Cornish legends are not prescribed in TSRGD and the DfT has confirmed that they will not authorise such signs going forward. On this basis, Highways England cannot provide the junction names in the Cornish language as well as English. If Cornwall Council would like Cornish language names added to any signs on the Strategic Road Network or the local road network, they will need to discuss this matter with DfT directly. This is recorded in reference 13.2 in Section 5.2 'Specific Matters Outstanding' of the in the Statement of Common Ground between Highways England and Cornwall Council (Document Reference 7.4(A)) [REP1-003].
A2. 35	Traffic monitoring on new scheme	Four Automatic Number Plate Recognition (ANPR) cameras are being provided as part of the new A30 scheme to replace the four ANPR cameras

Paragraph	Text from LIR	Highways England Response
	<p><i>Cornwall Council has requested monitoring of traffic using Automatic Number Plate Recognition (ANPR) cameras and for a period capturing seasonal differences and traffic neutral months. The exact locations of sites, parameters and funding are to be agreed. ANPR cameras will be installed by Highways England on the new A30 as part of the construction of the scheme.</i></p>	<p>on the existing A30 through this section. They are proposed to be located at the two public lay-bys between the Chiverton and Chybucca junctions and at the two public lay-bys at Maranzanvose, between the Chybucca and Carland Cross junctions.</p> <p>Following installation, the ANPR cameras will be maintained and operated as a Cornwall Council asset.</p> <p>This is recorded in reference 19.14 in Table 4.1 'Matters Agreed' of the in the Statement of Common Ground between Highways England and Cornwall Council (Document Reference 7.4(A)) [REP1-003].</p>
A3. 1.-	<p><i>De-Trunking the existing A30</i></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>	Noted.
A3. 2	<p><i>The general intention is that the existing A30 would be downgraded to a level appropriate to its future service level. As the new scheme prohibits cyclists on that section between Carland and Chiverton it will be necessary to route them via the existing A30</i></p>	Noted.
A3. 3	<p><i>It has also been agreed with Highways England that the existing A30 would act as a temporary diversion route for the new scheme in the event of planned maintenance or an incident requiring closure. This would necessitate that the future carriageway would have a desirable minimum width of 6.8m but an absolute minimum width of 6.1m with reduced speed limits. Any changes will accommodate the abnormal loads and the final designs will be agreed with the Cornwall Council Highways Team and the Highways England's Operations Team</i></p>	Noted.

Paragraph	Text from LIR	Highways England Response
A3. 4	<p><i>The predicted two way annual average daily traffic (AADT) flows on the existing A30 are shown in table A3.1 below:</i></p> <p><i>[see LIR for Table]</i></p>	Noted.
A3. 5.	<p><i>The Council has reviewed the predicted traffic flows on the existing A30 and formed an outline de-trunking strategy with regards to future speed limits, road classification and provision for WCH whilst recognising the need to accommodate abnormal loads and to act as a temporary diversion route.</i></p>	Noted.
A3. 6.	<p><i>This outline strategy is described further below and illustrated on Drawing A2 Outline detrunking strategy (EDG1494-CSL-HGN-SW797500-SK-Z-0002-P01) found at end of this report. It should be noted that the measures described are interrelated in that what is done in one location effects and ideally complements what is done elsewhere.</i></p>	Noted.
A3. 7.	<p>Carland to Boxheater</p> <p><i>The eastern most section of the existing A30 will be the busiest in terms of predicted traffic flows, albeit significantly less than the current situation, and would be the signed route from Carland Cross junction to Goonhavern and Perranporth. Therefore it is proposed that this section is downgraded to a B road classification, effectively continuing the B3285 from Goonhavern and Perranporth to Carland Cross. As shown on Drawing A2 - Outline Detrunking strategy it is proposed this section of road would operate under a 50mph limit, with a reduction in carriageway width and changes to cross section to accommodate an off road WCH path.</i></p>	<p>Any width changes along the full length of the existing A30 as part of the de-trunking works will be carried out by Cornwall Council following the construction of the A30 scheme.</p> <p>Highways England will fund the reduction of the existing A30 width at Pennycomequick (in relation to Penglaze Barrow) to a minimum of between 6.1m-6.8m in response to requests from Historic England.</p> <p>This is recorded in reference 19.9 in Table 4.1 'Matters Agreed' of the in the Statement of Common Ground between Highways England and Cornwall Council (Document Reference 7.4(A)) [REP1-003].</p> <p>The proposed off-carriageway enhancements for WCHs on the existing A30 in this section will not be carried out by Highways England as part of the construction of the scheme.</p>

Paragraph	Text from LIR	Highways England Response
A3. 8.	<i>Further design work is required to provide scheme cost estimate for these measures, but it is the Councils view that these measures should be funded by Highways England as part of detrunking package of measures.</i>	This is recorded in reference 19.13 in Table 4.1 'Matters Agreed' of the in the Statement of Common Ground between Highways England and Cornwall Council (Document Reference 7.4(A)) [REP1-003].
A3. 9.	Boxheater Junction <i>As illustrated in figure A3.1 below, as a direct consequence of the new scheme opening the predominate flows at Boxheater junction would be traffic to and from Goonhavern and Perranporth on the B3285. Therefore it is the Councils view that the junction priority needs to be adjusted to reflect this new situation, and address potential safety issues this change in flows would raise with the current layout.</i>	The improvements proposed by Cornwall Council to the Boxheater junction would not be carried out by Highways England as part of the construction of the scheme; any works would be carried out by Cornwall Council. Highways England does not consider that funding of the proposed improvements is required, as there is no evidence of any safety issues with the current layout of the junction and no evidence from traffic modelling that the scheme would benefit from a reconfiguration of the junction. This is recorded in reference 19.1 in Section 5.2 'Specific Matters Outstanding' of the in the Statement of Common Ground between Highways England and Cornwall Council (Document Reference 7.4(A)) [REP1-003].
A3. 10.	<i>To address these issues the Council is proposing an alternative arrangement. The concept design is illustrated on Drawing A2 - Outline De-trunking strategy. An initial estimate puts this scheme cost at £611,800. The Councils position is that this scheme should be funded by Highways England as part of de-trunking package of measures.</i>	
A3. 11.	<i>As alluded to above any changes at Boxheater junction are related to the potential closure of Herver Lane, plus measures to downgrade the existing A30 and wider measures on Scotland Road and the A3075. The final agreed solution at this junction and on other parts of the network will need to reflect a complementary package of measures.</i>	
A3. 12.	<i>The realignment at Boxheater would also create the opportunity for a short length of 30mph speed limit on approach to new priority junction passing Mount Pleasant farm and number of dwellings in close proximity to the road. Once through this section the</i>	Any width changes along the full length of the existing A30 as part of the de-trunking works will be carried out by Cornwall Council following the construction of the A30 scheme.

Paragraph	Text from LIR	Highways England Response
	<i>road widens out and 40mph limit would be appropriate, with changes to the cross section to incorporate cycle lanes. It is proposed to downgrade this section to C road classification to reflect the much reduced use of the road.</i>	This is recorded in reference 19.9 in Table 4.1 'Matters Agreed' of the in the Statement of Common Ground between Highways England and Cornwall Council (Document Reference 7.4(A)) [REP1-003]. The proposed off-carriageway enhancements for WCHs on the existing A30 in this section will not be carried out by Highways England as part of the construction of the scheme.
A3. 13	<i>The speed limit through Marazanvose would be reduced to 30mph, supported by gateway signing and traffic management features. Consultation with residents is required to develop this principle further.</i>	This is recorded in reference 19.13 in Table 4.1 'Matters Agreed' of the in the Statement of Common Ground between Highways England and Cornwall Council (Document Reference 7.4(A)) [REP1-003].
A3. 14.	Chybucca to Chiverton <i>The western most section of the route is anticipated to have the lowest future traffic flows, and subject to further review could be further downgraded as unclassified lane. Changes to the cross section are proposed to provide on carriageway cycle lanes and single central running traffic lane, again operating under a 40mph limit.</i>	Any width changes along the full length of the existing A30 as part of the de-trunking works will be carried out by Cornwall Council following the construction of the A30 scheme. Highways England will fund the reduction of the existing A30 width at Four Burrows to a minimum of between 6.1m-6.8m in response to requests from Historic England. Highways England will also fund localised new green coloured surfacing at Four Burrows as part of the scheme mitigation works subject to further consultation with Historic England.
A3. 15	<i>Further design work and consultation is required to develop the de-trunking proposals in line with the strategy aspirations set out above. It is Councils view that these changes will necessitate works to reduce the width of some sections of the existing A30 in order for the de-trunked road to meet its future objectives, and that these measures should be funded by Highways England.</i>	This is recorded in reference 19.9 in Table 4.1 'Matters Agreed' of the in the Statement of Common Ground between Highways England and Cornwall Council (Document Reference 7.4(A)) [REP1-003]. The proposed off-carriageway enhancements for WCHs on the existing A30 in this section will not be carried out by Highways England as part of the construction of the scheme. This is recorded in reference 19.13 in Table 4.1 'Matters Agreed' of the in the Statement of Common Ground between Highways England and Cornwall Council (Document Reference 7.4(A)) [REP1-003].
A3. 16.	<i>Alongside the outline de-trunking strategy there are some further detailed issues to consider.</i>	
A3. 17	Signing Strategy <i>A signage strategy for the existing A30 has been provided by Highways England to Cornwall Council, including the approach to brown tourist signs, and</i>	It is agreed that a signage strategy for the existing A30 will be provided by Highways England to Cornwall Council, including the approach to brown tourist signs, and Cornwall Council will review the final provision of all signage on the existing A30. This is to include the existing trunk road signs on the

Paragraph	Text from LIR	Highways England Response
	<p><i>Cornwall Council will review the final provision of all signage on the existing A30. This review is to include existing trunk road signs on the existing A30 that would be removed or replaced with smaller signs where possible. Signage on the existing A30 will be funded by Highways England and carried out by Cornwall Council.</i></p>	<p>existing A30, which will be removed or replaced with smaller signs where possible. Signage on the existing A30 will be funded by Highways England and carried out by Cornwall Council.</p> <p>This is recorded in reference 19.6 in Table 4.1 'Matters Agreed' of the in the Statement of Common Ground between Highways England and Cornwall Council (Document Reference 7.4(A)) [REP1-003].</p>
A3. 18.	<p><i>The Council intends to include the English and Cornish language version of junction names on the main junction map signs. These would be: o Zelah = An Hel o Boxheater = Trielin</i></p>	<p>Traffic signs must either be prescribed by Traffic Signs Regulations and General Directions (TSRGD) or specially authorised by the Department for Transport (DfT). Signs that are neither prescribed or authorised are obstructions on the highway and would be removed. Bilingual signs incorporating Cornish legends are not prescribed in TSRGD and the DfT has confirmed that they will not authorise such signs going forward.</p> <p>On this basis, Highways England cannot provide the junction names in the Cornish language as well as English. If Cornwall Council would like Cornish language names added to any signs on the Strategic Road Network or the local road network, they would need to discuss this matter with DfT directly.</p> <p>This is recorded in reference 13.2 in Section 5.2 'Specific Matters Outstanding' of the in the Statement of Common Ground between Highways England and Cornwall Council (Document Reference 7.4(A)) [REP1-003].</p>
A3. 19	<p><i>Lay by strategy and works .</i></p> <p><i>A lay-by strategy review will be undertaken by Cornwall Council to identify which laybys should be removed on the existing A30. The removal of lay-bys will aim to reduce potential anti-social behaviour whilst retaining those that are naturally overlooked and would have an appropriate future use.</i></p>	<p>A lay-by strategy review will be undertaken by Cornwall Council to identify which laybys should be removed on the existing A30.</p> <p>This is recorded in reference 19.11 in Table 4.1 'Matters Agreed' of the in the Statement of Common Ground between Highways England and Cornwall Council (Document Reference 7.4(A)) [REP1-003].</p>
A3. 20.	<p><i>Further work is required to determine which if any of the existing laybys should be removed, but the Councils position is that the cost of removing any</i></p>	<p>Any works to remove existing lay-bys will not be funded by Highways England.</p>

Paragraph	Text from LIR	Highways England Response
	<i>laybys no longer required due to the new scheme should be funded by Highways England.</i>	This is recorded in reference 19.4 in Section 5.2 'Specific Matters Outstanding' of the in the Statement of Common Ground between Highways England and Cornwall Council (Document Reference 7.4(A)) [REP1-003].
A3. 21.	<p>Condition Survey</p> <p><i>Highways England will agree the scope of and provide Cornwall Council with a condition survey of the existing A30 prior to the de-trunking of the existing A30. This scope will include provision for the agreement of the any maintenance works required as part of the detrunking including surfacing, drainage and verges.</i></p>	<p>Highways England will agree the scope of and provide Cornwall Council with a condition survey of the existing A30 prior to the de-trunking of the existing A30. This scope will include provision for the agreement of the works required as part of the de-trunking, with Cornwall Council to specify the maintenance category in addition to their proposed future road classification.</p> <p>This is recorded in reference 19.10 in Table 4.1 'Matters Agreed' of the in the Statement of Common Ground between Highways England and Cornwall Council (Document Reference 7.4(A)) [REP1-003].</p>

13 Public Rights of Way

13.1 Overview

- 13.1.1 There are no matters outstanding relating to public rights of way (PRoW) in the **Statement of Common Ground between Highways England and Cornwall Council** (Document Reference 7.4(A)) [REP1-003] as submitted at Deadline 1.
- 13.1.2 Highways England has noted that no comments were received in relation to the overarching approach taken to the assessment of effects on PRoW or the approach to mitigating impacts (such as the Public Rights of Way Management Plan). Rather, the nature of the comments in paragraph 12.1 of the LIR are in relation to potential improvements *'where possible'*.

13.2 Specific comments

- 13.2.1 For ease of reference, the Highways England comments on the points raised by Cornwall Council have been tabulated below.

Table 13-1 Highways England comments on section 12.1 of the LIR

Paragraph	Text from LIR	Highways England Response
12.1	<i>Sheet 1-ref. Z11- Consider whether there could there be an additional length of path to join BOAT 309/25/7 on the north side of the bypass to increase connectivity</i>	The restricted byway ref Z11 is specifically for eastbound cyclists on the new A30 heading north on the B3277 to St Agnes, providing a shorter distance to the B3277 and avoiding the Chiverton junction. A connection between this route and the BOAT 309/25/7 could lead to a safety issue of cyclists travelling westbound on the eastbound A30 dual carriageway and therefore this will not included as part of the scheme.
12.1	<i>Sheet 2-ref. Z (PR5)- Could this be upgraded to bridleway status and not footpath;</i>	PR5 is a stepped footpath to reduce the distance for walkers on the BR314/65/1 to the footways at the Chybuca junction. PR4 provides a connection between BR314/64/1 and BR314/65/1 without having to use the B3284 as agreed with the horse riding user groups. PR5 will not be upgraded to a bridleway as part of the scheme.
12.1	<i>Sheet 5-ref. JJ(PR10)- Could private means of access (16) be changed to Public Bridleway and linked to JJ along south side of bypass to give a connection to the east from the underbridge;</i>	Private access (16) was requested by the landowner as a private access so any public bridleway over this length would have to be separate and run parallel to it. There is insufficient land available within the scheme to provide a parallel bridleway to the private access and its extension through to the existing bridleway JJ.
12.1	<i>Sheet 5- ref. LL (U6083) – support provision of the new right of way but there appears to be a historical gap in highway rights of the unclassified lane U6083 where it crosses the existing A30 – could the footpath extend over the existing A30 to provide continuous link.</i>	The new underpass and crossing of the new A30 will tie into the existing southern steps, with the existing steps and crossing of the existing A30 retained. Cornwall Council could extend the footpath over the existing crossing as part of their de-trunking works if considered necessary.

14 Surface Water Drainage

14.1 Overview

- 14.1.1 There are no matters outstanding relating to Road Drainage and the Water Environment in the **Statement of Common Ground between Highways England and Cornwall Council** (Document Reference 7.4(A)) [REP1-003] as submitted at Deadline 1.

14.2 Specific comments

- 14.2.1 Paragraph 13.2 of the LIR refers to consent from Cornwall Council to undertake works within or affecting ordinary watercourses. Consent(s) from Cornwall Council (the Lead Local Flood Authority) to alter ordinary watercourses pursuant to section 23 of the Land Drainage Act 1991 is listed in the **Details of Other Consents and Licences** (Document Reference 7.2) [APP-046].
- 14.2.2 Paragraphs 13.3 – 13.12 of the LIR are noted and agreed. Requirements are included in Schedule 2 of the **Draft DCO** (Document Reference 3.1(C)), specifically Requirement 12 (Detailed Design) and Requirement 13 (Surface and Foul Water Drainage), confirming that Cornwall Council would be consulted at the detailed design stage.

15 Minerals Safeguarding Issues

15.1 Overview

15.1.1 There are a number of matters relating to materials which are agreed between Cornwall Council and Highways England as set out in the **Statement of Common Ground between Highways England and Cornwall Council** (Document Reference 7.4(A)) [REP1-003] submitted at Deadline 1.

15.2 Specific comments

15.2.1 For ease of reference, the Highways England comments on the points raised by Cornwall Council have been tabulated below.

Table 15-1 Highways England comments on section 14.1 to 14.4 of the LIR

Paragraph	Text from LIR	Highways England Response
14.1	<i>As a general introductory statement the Council advises that the Minerals Safeguarding DPD was adopted by the Council on 4th December following an independent examination. It is understood that the Environmental Statement and Planning Statement were prepared prior to the adoption of the DPD. The following comments are made in respect of Chapter 10: Materials, of the Environmental Statement.</i>	<p>This is correct. At the time of Environmental Statement preparation, the Minerals Safeguarding DPD had not yet been adopted. As such, the information in the draft Minerals Safeguarding DPD was used to inform the assessment.</p> <p>Paragraph 9.6.28 of Chapter 9 Geology and Soils of the Environmental Statement (Document Reference 6.2) [APP-062] states that the draft Minerals Safeguarding Development Plan does not indicate the presence of any Mineral Safeguarding Areas within the scheme study area (using the Cornwall Council Interactive Map). This is consistent with the final version of the plan that was adopted on 4 December 2018. This demonstrates that no mineral resource in the area would be sterilised by the proposed development.</p>
14.2	<i>It is noted that the information in Chapter 10 is largely taken from evidence published to support the adopted Cornwall Local Plan; however there are a number of statements that require clarification. Paragraph 10.6.15 refers to a lack of long-term availability of china clay; this is not actually accurate; Cornwall has a sufficient permitted supply of china clay, based on current production levels which would see production maintained for 60 years. However, it is recognised that there is a lack of high specification aggregates in Cornwall.</i>	<p>Highways England notes and agrees with Cornwall Council's comment that there is a lack of high specification aggregates in Cornwall. This is addressed in Paragraphs 10:6.15, Paragraph 10.6.16 and Table 10-8 of Chapter 10 Materials of the Environmental Statement (Document Reference 6.2) [APP-063].</p> <p>Highways England notes Cornwall Council's assessment of the availability of china clay within Cornwall. An update to the Environmental Statement stating that 'China Clay production will be maintained for 60 years' will be provided to the Examination in an Environmental Statement Addendum.</p>

Paragraph	Text from LIR	Highways England Response
14.3	<p><i>With reference to data on arisings of construction, demolition & excavation waste, this is not widely available and a survey was undertaken nationally in 2008 (published in 2010), this survey identified totals for the SW and therefore Cornwall Council developed a methodology for apportioning the data to a local level. This needs to be clearly set out in paragraph 10.6.21 and 10.6.22, as currently the wording is not clear.</i></p>	<p>The current wording of paragraph 10.6.21 of Chapter 10 Materials of the Environmental Statement (Document Reference 6.2) [APP-063] states: “<i>The Cornwall Local Plan (2016) states that waste production associated with the Construction, Demolition and Excavation (CDE) industries is expected to increase by approximately 230,000 tonnes per annum for the remainder of the Plan period up until 2030. In order to manage the increase in waste, the Plan states that additional waste management infrastructure is required.</i>”</p> <p>This has been taken from paragraph 2.121 of the Cornwall Local Plan. The Local Plan does not itself set out that Cornwall Council developed a methodology for apportioning the national data to a local level. Highways England will incorporate an amendment into the Environmental Statement Addendum to make this clear.</p>
14.4	<p><i>Paragraph 10.11.8 makes reference to china clay and it is assumed that this should be secondary aggregates resulting from china clay production. These would be sourced from the china clay waste processors rather than the china clay industry directly. The data set out in paragraph 10.11.9 should refer to a national china clay production rate of circa 1million tonnes; due to commercial confidentiality we are unable to report a production figure for Cornwall.</i></p>	<p>Paragraph 10.11.8 in Chapter 10 Materials of the Environmental Statement (Document Reference 6.2) [APP-063] refers to the aggregates resulting from the china clay production however it is agreed that stating ‘<i>this material can be sourced from local China Clay quarries</i>’ is open to interpretation – the material would be sourced from the industry which manages the china clay by-product.</p> <p>Paragraph 10.11.9 of Chapter 10 should say ‘<i>China clay is currently being extracted in the UK at a rate of approximately 1 million tonnes per year</i>’, not ‘Cornwall’. Highways England will incorporate an amendment into the Environmental Statement Addendum to make this clear.</p>

16 Scheme Benefits

16.1 Overview

16.1.1 Highways England notes the points made in paragraphs 15.1 to 15.11 regarding Cornwall Council's consideration and recognition of the benefits of the scheme.

16.2 Specific comments

16.2.1 Highways England notes that the Council considers the scheme to be in accordance with the policy objectives of the following documents:

- a) National Planning Policy Framework (paragraph 15.1 of the LIR)
- b) Cornwall Council Local Transport Plan: 2030 strategy policies (paragraph 15.2)
- c) Cornwall Local Plan with LEP strategies (paragraph 15.3)

16.2.2 Highways England also note paragraph 15.4 which states that the Council consider the scheme will solve problems associated with the existing A30, namely:

- a) Delay and congestion (15.5 – 15.6)
- b) Enhance economic growth (15.7)
- c) Reduce the number of accidents (15.8)
- d) Improve quality of life for those that live close to the route (15.9)
- e) Improve the resilience and reliability of the A30 route (15.10)
- f) Majority of residents are in favour of the scheme (15.11)

17 Conclusion

- 17.1.1 This document has focused on the pertinent points cited by Cornwall Council and has responded to the relevant matters raised.
- 17.1.2 The large number of specific matters agreed between Highways England and Cornwall Council is evidenced in Table 4.1 of the **Statement of Common Ground between Highways England and Cornwall Council** (Document Reference 7.4(A)) [REP1-003] and is reflected in the concise nature of the LIR.
- 17.1.3 Highways England would concur with paragraph 16.1 of the LIR that:
“... within the context of the overall scheme these impacts are considered to be limited...”
- 17.1.4 Highways England will continue to engage positively with Cornwall Council on all matters that are still subject to negotiation throughout the Examination process.

If you need help accessing this or any other Highways England information, please call **0300 123 5000** and we will help you.

