From: Steve Chamberlain

Sent: 31 May 2019 11:43

To: A30 Chiverton to Carland Cross

<a30ChivertontoCarlandCross@planninginspectorate.gov.uk>

Subject: Response to HE submission in relation to route selection submitted at deadline 3

Dear Chiverton to Carland Cross team

Please find attached our response to HE's submission in relation to route selection at deadline 3.

Sincere apologies for the delay responding. May is an incredibly busy month on the farm with events season in full swing alongside calving, the end of lambing and crunch time with crops.

A Summary is included below with a detailed response attached.

Summary

A number of flaws in relation to the route selection process have been raised in our objections since the preferred route was announced. These objections are detailed in 'Revised Table 7.6' submitted to the examination on 19th March 2019 in response to Deadline 2.

Two key objections refer to the inadequate cultural heritage assessment undertaken by Highways England (HE) during this process, and mistakes made during options analysis resulting in incorrect outcomes that HE concluded from Table 7-6 in the Scheme Assessment Report (Document Reference 7.6) [APP-050] (SAR).

The detailed response submitted by HE at Deadline 3 provides further information with particular reference to Cultural Heritage, the methodology used during route selection, and detailed maps to clarify the differences between alternative routes.

We believe this response further strengthens our objections in the following ways-

- <u>Cultural heritage</u> HE response at Deadline 3 confirms that at route selection Historic England were not given the opportunity to assess the alternative routes that were examined at options analysis or other information they had requested to enable them to compare the impact on the assets affected.
- Noise, Visual Impact and Living Standards The HE narrative and detailed description of the workshops held on 27th Feb 2017 and 2nd March 2017 clarify where mistakes were made during this assessment process. Confusion of participants as to which 'Northern Route' they were assessing occurs a number of times during the process as detailed below. This confusion results in the incorrect 'best performing alternative' being stated in table 7-6 for Noise, Visual Impact and Living standards
- **Business Impacts** the new narrative in Table 7.6 continues to assess Business Impact in terms of fields severed, not by assessing actual business impacts. For example, it does not

mention Marazan Farm's removal and it classes Ranger Barn as a business. There is a discrepancy between the number of fields referenced in the summary and the narrative

• These objections are further supported by the **<u>Detailed Maps</u>** provided in HE 'Appendix B'

Please see attached our detailed response as supporting evidence. This response deals with paragraphs in Document 8.11 – Response to Hearing Action Points – CAH using the same numbering.

As a result of this supporting evidence, we believe that an Issue Specific Hearing is fundamentally required in order to fully examine the route selection issues set out above and the significant business impacts of the submitted route for which development consent is being sought.

Business Impacts during construction remain a significant objection. We will update the examiner w/c 17^{th} June following a scheduled meeting with HE.

Regards

Steve and Lucy Chamberlain

From: A30 Chiverton to Carland Cross

<a30ChivertontoCarlandCross@planninginspectorate.gov.uk>

Sent: 15 March 2019 16:41

To: Steve Chamberlain

Cc: A30 Chiverton to Carland Cross

<a href="mailto: < A30ChivertontoCarlandCross@planninginspectorate.gov.uk

Subject: RE: Written Representation

Dear Steve

Just to update you with regard to the Accompanied Site Inspection on 1 April. Highways England will carry out a site safety briefing before we start however as we are meeting at your property there will be an opportunity for you to also brief us on anything you think we should know.

Regards

Sian

Siân Evans

Case Manager

National Infrastructure Planning

The Planning Inspectorate, Temple Quay House, 2 The Square, Temple Quay

House, Temple Quay, Bristol, BS1 6PN

Direct line: 0303 444 5671 Helpline: 0303 444 5000

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Infrastructure Planning)

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Planning Inspectorate)

Twitter: @PINSgov

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From: Steve Chamberlain

Sent: 04 March 2019 16:43

To: A30 Chiverton to Carland Cross

<a30ChivertontoCarlandCross@planninginspectorate.gov.uk>

Subject: RE: Written Representation

Hi Sian

Many thanks for your email. We would be happy to confirm the inspection on Monday 1st.

Please let us know if you have any questions or queries before your visit.

Best wishes

Steve

From: A30 Chiverton to Carland Cross

<a30ChivertontoCarlandCross@planninginspectorate.gov.uk>

Sent: 01 March 2019 18:00

To: Steve Chamberlain

Cc: A30 Chiverton to Carland Cross

<a30ChivertontoCarlandCross@planninginspectorate.gov.uk>

Subject: RE: Written Representation

Dear Mr Chamberlain

Further to your email below we would like to include Nancarrow Farm in the Accompanied Site Inspection and are proposing to start there on Monday 1 April 2019 at 1pm. I would just like to check that you would be happy for us all to meet at the farm at that time and park there?

Regards

Sian

Siân Evans

Case Manager

National Infrastructure Planning

The Planning Inspectorate, Temple Quay House, 2 The Square, Temple Quay

House, Temple Quay, Bristol, BS1 6PN

Direct line: 0303 444 5671 Helpline: 0303 444 5000

Email: <u>sian.evans@planninginspectorate.gov.uk</u>

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Planning Inspectorate)

Twitter: @PINSgov

This communication does not constitute legal advice Please view our <u>Privacy Notice</u> before sending information to the Planning Inspectorate. From: Steve Chamberlain

Sent: 19 February 2019 20:00 **To:** A30 Chiverton to Carland Cross

<a href="mailto: < A30ChivertontoCarlandCross@planninginspectorate.gov.uk

Subject: RE: Written Representation

Dear Chiverton to Carland Cross Project Team

Please find attached our written representation (hopefully without track changes this time) As discussed yesterday, we have been informed HE have submitted a 30 page response to our relevant representation and we welcome the opportunity the respond during the examination process.

As stated in the preliminary meeting, we would like to confirm the following:

Request For An Issue Specific Hearing

In light of the multiple and complex nature of the case at Nancarrow Farm we would like to request an Issue Specific Hearing to avoid attending multiple hearings throughout the examination.

Notification to Attend Compulsory Acquisition Hearing

Should this not be possible we would like to attend the Compulsory Acquisition Hearing.

Request For Accompanied Site Visit to Nancarrow

We would also like to request an accompanied site visit to Nancarrow Farm so that the examiner can gain a greater understanding of the impacts of the road scheme and the relationship between the landscape and both the events and farm businesses, their associated buildings, and how all elements are inextricably linked. We would like to request to attend the site visit.

Kind regards

Steve and Lucy Chamberlain

From: A30 Chiverton to Carland Cross

<a30ChivertontoCarlandCross@planninginspectorate.gov.uk>

Sent: 13 February 2019 12:10

To: Steve Chamberlain

Subject: A30 Chiverton to Carland Cross Scheme (TR010026)

Dear Sir/ Madam

Planning Act 2008 (as amended) – Section 88 and the Infrastructure Planning (Examination Procedure) Rules 2010 (as amended)

Application by Highways England for an Order Granting Development Consent for the A30 Chiverton to Carland Cross scheme

Examination timetable and procedure

Your reference: 20016199

The Rule 8 letter giving notice of the procedural decisions made following the Preliminary Meeting about the way in which the proposal for the above project is to be examined has been published to the project page of the National Infrastructure website. The letter includes the timetable for the examination of the application and the Examining Authority's initial questions. It also requests Statements of Common Ground and Local Impact Reports, and invites Interested Parties to submit Written Representations.

https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010026/TR010026-000655-30CC%20Rule%208%20Letter%20and%20AnnexFINAL.pdf

If you do not have access to the internet or are unable to visit public facilities, for example a local library, please contact us at the details below and a member of the Planning Inspectorate's case team will be able to provide you with the relevant details.

If you can supply us with an email address we will be able to issue the Rule 8 letter and any future correspondence to you electronically. You can also access the letter using the QR code below. A significant amount of information is contained within this notification and it invites you to provide responses by specific deadlines so please ensure that you access this as soon as possible.

Please do not hesitate to contact the Planning Inspectorate's case team if you require any further information.

Yours faithfully
A30 Chiverton to Carland Cross Project Team
National Infrastructure Planning
The Planning Inspectorate
Temple Quay House
Temple Quay
Bristol
BS1 6PN

Web: https://infrastructure.planninginspectorate.gov.uk/ (National Infrastructure Planning)

Web: www.gov.uk/government/organisations/planning-inspectorate (The Planning Inspectorate)

Twitter: @PINSgov

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A30 Chiverton to Carland Cross - TR010026

Response to Document 8.11 - Response to Hearing Action Points - CAH (Response)

On behalf of Nancarrow Farm, Steve and Lucy Chamberlain and Peter Mewton

Summary

A number of flaws in relation to the route selection process have been raised in our objections since the preferred route was announced. These objections are detailed in 'Revised Table 7.6' submitted to the examination on 19th March 2019 in response to Deadline 2.

Two key objections refer to the inadequate cultural heritage assessment undertaken by Highways England (HE) during this process and mistakes made during options analysis resulting in incorrect outcomes that HE concluded from Table 7-6 in the Scheme Assessment Report (Document Reference 7.6) [APP-050] (SAR).

The detailed methodology provided by HE at Deadline 3 provides further information with particular reference to Cultural Heritage, the methodology used during route selection, and detailed maps to clarify the differences between alternative routes.

We believe this response further strengthens our objections in the following ways-

- <u>Cultural heritage</u> HE response at Deadline 3 confirms that at route selection Historic England
 were not given the opportunity to assess the alternative routes that were examined at
 options analysis or other information they had requested to enable them to compare the
 impact on the assets affected.
- Noise, Visual Impact and Living Standards
 The HE narrative and detailed description of the workshops held on 27th Feb 2017 and 2nd March 2017 clarify where mistakes were made during this assessment process. Confusion of participants as to which 'Northern Route' they were assessing occurs a number of times during the process as detailed below. This confusion results in the incorrect 'best performing alternative' being stated in table 7-6 for Noise, Visual Impact and Living standards
- Business Impacts the new narrative in Table 7.6 continues to assess Business Impact in terms of fields severed, not by assessing actual business impacts. For example, it does not mention Marazan Farm's removal and it classes Ranger Barn as a business. There is a discrepancy between the number of fields referenced in the summary and the narrative
- These objections are further supported by the <u>Detailed Maps</u> provided in Appendix B.

Please see detailed response below as supporting evidence. This response deals with paragraphs in Document 8.11 – Response to Hearing Action Points – CAH using the same numbering.

Action Point 4 - Table 3.1 - Point 4

It is important to note that Nancarrow Farm's (NF) reference to 'strategic land' or 'strategic field' is to land or fields which are adjacent to the farmyard and which are intrinsic to their operation and

business. The land shown by point 4 on the plan attached at Appendix A of the Response is not considered 'strategic'.

In relation to this parcel of land is there any possibility of the works, particularly the pond, being reconfigured to maximise the extent of the land that will be retained?

Action Point 6

Paragraph 4.1.1

The Scoping Opinion issued by The Planning Inspectorate dated September 2017 states at point 7.3.2.7 that the applicant "...should provide clear and convincing justification for any harm or loss to designated heritage assets...". This has not been evidenced. In addition, at point 7.3.3.1 on page 24 it states, 'In defining the value of heritage assets the Applicant should seek agreement with the Heritage team at Cornwall Council as well as Historic England.' Neither Cornwall Council nor Historic England were consulted on the route selection process. They were asked to comment on the preferred route but were not asked to consider the northern alignment 7B with any southern alignment.

The Scheme Assessment Report (Document Reference 7.7) [APP-051], under the section headed 'Cultural heritage' on page 15 confirms that a northern alignment would have a 'slightly less' detrimental affect on Nancarrow Farmhouse, although we believe this to be 'significantly less effect'.

Overall, there has been no evidence that there was a full, detailed and fully referenced assessment as required by point 7.3.6.8. This should have formed a critical part of the SAR and is not referred to in that document.

Paragraph 4.1.2

This is noted, however, for the reasons already submitted into the Examination and set out later in this response Highways England's (HE) view is challenged as being fundamentally flawed.

Paragraph 4.1.4

The Statement of Common Ground with Historic England states as follows;

"HBMCE remain unable to comment in detail on the relative historic environment impacts of the proposed route in relation to the above designated heritage assets since the previously requested options appraisal for the route between these designated heritage assets has not been supplied."

It is therefore clear that Historic England were not consulted on the route selection process despite this being required by the Planning Inspectorate's Scoping Opinion.

Paragraph 4.1.5

Cornwall Council's Historic Environment Team were not consulted as part of the route selection process again contrary to the Planning Inspectorate's Scoping Opinion. Subsequently, NF have tried to engage with Cornwall Council's Historic Environment Team but without success. NF should not be prejudiced by the lack of engagement on Cornwall Council's part or by HE's failure to properly consult on their route selection process.

Commented [WT1]: I don't think can add anything much else here. I have addressed shortcomings in table 3.2 and in particular 7.3.3.1. HE do cross refer to the guidance referred to in 7.3.6.8 in their Environmental Statement and

Paragraph 4.1.6

The Local Impact Report (LIR) has no bearing on the route selection process. In any event, the LIR does not deal with any heritage issues whatsoever. Just because Cornwall Council have not raise any issues relating to heritage assets is not a justification or endorsement of the approach taken by HE to date.

Action Point 8

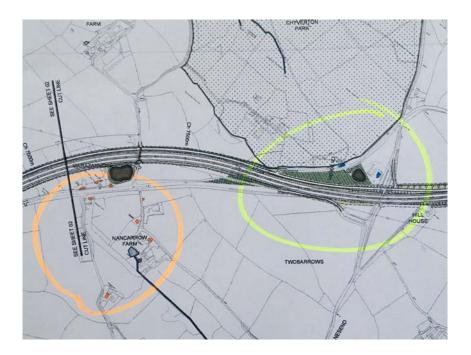
Detailed maps of the alternative routes were provided by HE at deadline 3. For the purpose of this document, we have compared Northern route 7B, and the preferred route 7A.

In each case the properties in Marazanvose have been marked in orange. As the map shows, Marazanvose comprises of 9 dwellings (or 10 if you include Grooms Cottage) 5 to the north and 5 to the south.

St Freda and Chyverton Lodge, both referred to in the narrative supplied by HE at deadline 3 have been marked in blue.

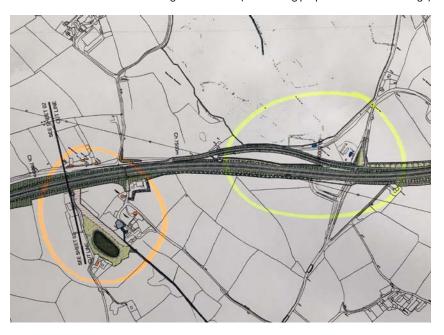
MAP 1

Northern option 7B – shown passing Chyverton and Marazanvose, avoiding all designated and non designated assets.



MAP 2

Preferred route 7A – shown severing Marazanvose (8 remaining properties marked in orange)



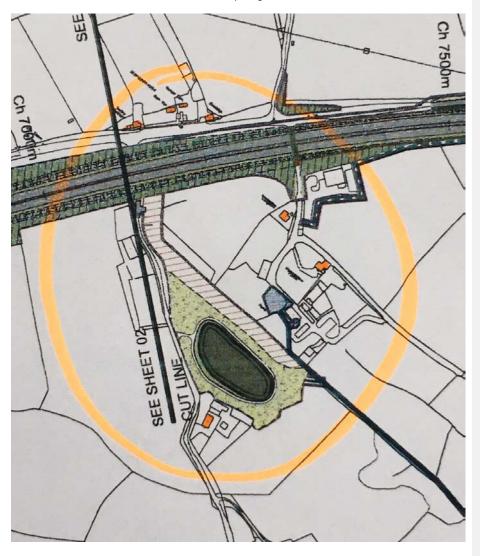
A close up of Northern option 7B shows that the scheme is located further from all 10 dwellings in Marazanvose. The local road runs adjacent to the dual carriageway (to the north) with a little used access lane (stopped off to the west of Marazanvose) As illustrated by the map, this option would reconnect the community and transforms the lives of the Marazanvose residents.

Severed fields owned by Nancarrow Farm to the North of Marazanvose were offered to mitigate land lost by other farms including Ranger Barn.

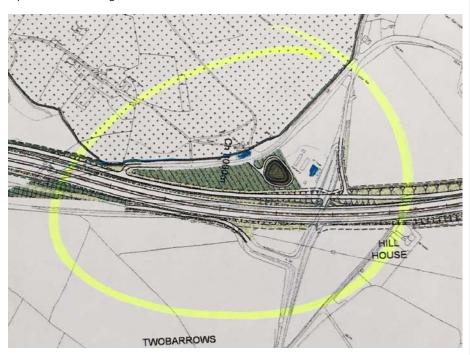
The map suggests a significantly improved outcome in terms of visual impacts, business impacts, noise and living standards for all residents in Marazanvose. Contrary to the assessment and recently supplied narrative.



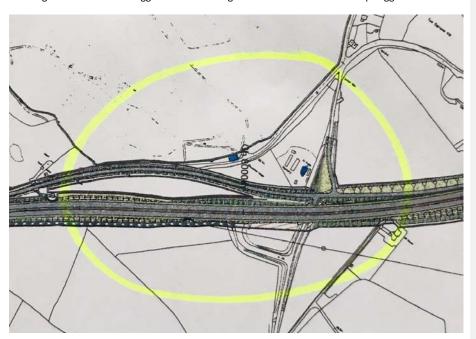
Preferred route 7A – shown located closer to all dwellings in Marazanvose. The 5 dwellings in Marazanvose would maintain a busy local route on their doorstep with a dual carriageway located next to it. To the south, 2 dwellings are destroyed, and the remaining 3 are all significantly closer. The conclusion that Visual Impacts, Noise Impacts and Living Standards would be better suggests the incorrect Northern route was assessed when comparing routes.



Northern option 7B – shown passing Chyverton Park, Chyverton Lodge and St Freda (marked in blue). The local road runs closer to the dual carriageway alignment meaning it is further from both the lodge and St Freda, and avoids Chyverton Park. The dual carriageway is on a similar alignment as it passes these dwellings.



Preferred route 7A - The alignment of the dual carriageway is similar to the Northern route as it passes St Freda and Chyverton Lodge (marked in blue) and the local road runs closer to both dwellings. The assessment suggests both dwellings would be better off. The map suggests not.



Action Point 9

Paragraph 7.1.10

This statement implies that Nancarrow would be the only beneficiaries of this option.

It should be clarified that the northern alternative also sought to avoid:

- the acquisition of dwellings (i.e. Grooms Cottage and Marazan Farm);
- significant business impacts on Nancarrow Farm and Marazan Farm;
- impacts of listed and non-listed heritage assets

Paragraph 7.1.14

It should be highlighted that the northern option 7B was '...preferred by most residents of Marazanvose.' This is because northern option 7B is the best performing option overall for Marazanvose. For HE to conclude otherwise from the results of Table 7.6 is unjustifiable.

Paragraph 7.1.15

This statement is misleading. Whilst the largest number of respondents favoured a southern alignment these were primarily residents of Zelah more concerned about issues unrelated to the northern alignment and the impacts of a southern alignment on Marazanvose and its cultural and business assets.

Paragraph 7.1.16

This states that "...feedback from Historic England, Natural England and Cornwall Council was also considered." It has been clearly established that neither Historic England or Cornwall Council were consulted on the route selection process. In particular, please refer to the response to paragraph 4.1.4 above.

Paragraph 7.1.18

Sub-paragraph 3, refers to an analysis of summary assessments and risk areas for each option. NF would request that this is made available as a priority.

Paragraph 7.1.20

The incorrect Northern option has been considered when comparing noise impact of route 7A v 7B.

Option 7B would <u>not</u> result in a noise source being in front and behind the dwellings at Marazanvose as both the trunk road and local road would be running to the north with only a little used cul-de-sac to the front serving only the hamlet.

This narrative, as described by Highways England, clearly identifies where the fundamental error in relation to the assessment of noise impact occurred.

In addition, HE state there are 5 dwellings at Marazanvose in the NIA and 2 properties at Nancarrow that would be impacted 'hence the comparison of five and two'. This illustrates a miscalculation by HE of the number of properties south of the existing A30 in Marazanvose requiring consideration.

Marazanvose comprises 5 properties to the north of the A30 and 4 to the south (5 if you include Grooms Cottage which would be inhabited by now). This is highlighted on the map in Action Point 8.

Table 7.1

In this table reference is made to Option 7A only having an adverse impact on 2 residential properties at Nancarrow. This statement is incorrect for 2 reasons; as detailed above

- the incorrect route appears to have been assessed. The noise assessment should have compared 2 roads located to the north of the hamlet with noise levels of 2 roads running through the hamlet.
- as raised above 2 (or 3 including Grooms Cottage) properties have been excluded from this table.
 - Marazanvose Farm appears to have been excluded from this assessment despite losing significant land to the drainage pond, and having been outlined (in the PEIR) as the worst affected dwelling along the whole route in terms of increase in pollution.

An alternative assessment should be undertaken of the correct route comparison, and the correct number of noise receptors.

The detailed maps indicate both the local road and the dual carriageway are situated *closer* to <u>all</u> remaining properties for the southern option 7A versus the northern option 7B, (Marazan Farm and Groom's cottage having been removed completely). It is therefore highly likely that the northern option performs better in terms of noise for all properties in Marazanvose.

Paragraph 7.1.23

The revised Table 7-6 already been submitted into the examination, at Deadline 2, clearly shows that the original assessment was flawed and the northern option 7B would appear to perform better in terms of

- Visual Impact
- Noise
- Living Standards
- Business Impact
- Residential demolition

Whilst 7A performs better in terms of

- Estimated cost
- Risk of delay
- Land acquired

Cultural Heritage was not properly assessed, but by reviewing the detailed maps in Action point 8, it could be argued that northern option 7B avoids all designated and non designated cultural assets, therefore performs better than southern option 7A.

Further detail is provided below.

Table 7.2

Business Impacts

The assessment methodology states that business impacts were noted but implies that greater emphasis was placed on number of fields impacted. The additional narrative refers to affects on numbers of fields but appears to provide different numbers to those in the original table.

The assessment also takes no account of the strategic importance of the land take to the owners and their businesses. For example the land owned by Nancarrow that would be impacted by the northern alignment is not considered 'strategic' land whereas the land required for the southern alignment is fundamental to the operation of the business and will require extensive accommodation works to mitigate the effects of the land take.

There is no mention of the significant affect of the land take on Marazanvose Farm.

There is no mention of Marazan Farm campsite which is being removed as a result of the preferred route.

As stated in our 'revised table 7.6' submitted at Deadline 2 northern option7B performs better **however** the 'business impacts' are assessed. (i.e. number of businesses, scale of impact, wider economic impact, job losses/creation).

The Scheme Project Manager stated in the meeting held on 13 October 2017 that he agreed Option 7B performs much better when business impacts are assessed in isolation.

Cultural Heritage

The assessment methodology states that a 'cultural heritage expert undertook a qualitative assessment'. This wasn't anyone from Historic England or Cornwall Council's Historic Environment Team and the assessment would appear to have been made after route selection. Who undertook the assessment? Why has that assessment not been published? Did that assessment consider non-designated heritage assets? Why was it not undertaken before route selection?

In relation to the alternative narrative again there is no consideration of non-designated heritage assets. Unfair weighting has been given to Chyverton Park, which is and will remain adequately screened, particularly as the northern alignment would appear to be farther away from the lodge (as highlighted on the maps in Action point 8), which is already impacted by the existing trunk road. It is acknowledged that option 7B would result in beneficial impacts to Nancarrow Farmhouse. These have been under-estimated and would be significant from the southern alignment. In addition, there is no mention again of the significant benefits a northern alignment would have on the historic hamlet of Marazanyose.

The assessment methodology states their own cultural heritage expert concluded a marginal difference in impact between the 2 routes. This view clearly supports our position that a detailed impact assessment, including consultation with Historic England, should have been undertaken prior to route selection.

Visual Impact

The narrative provided by HE has omitted

- the complete loss of the mature belt of trees which currently screen Nancarrow from the existing A30:
- 2 area of woodland in the centre of Marazanvose and at the top of Two Burrows Hill; and
- the loss of trees at Nanteague Farm as a result of the southern alignment

(These areas have been highlighted on the maps outlined in Action point 8)

Has a tree count been undertaken? It would appear that significantly more trees will be removed with southern option 7A.

There is no mention of the impact on the setting of the listed Nancarrow Farmhouse and the historic hamlet of Marazanvose all of whom will suffer visually for at least 15 years whilst mitigation planting matures.

In fact there is also no mention of the visual impact for any of the residents of Marazanvose. It should be noted that the SAR incorrectly claims the 5 properties at Marazanvose would *better off* with the preferred southern route and then in the PIER (7.12.6) identified Marazanvose residential receptors as 'predicted to receive significant long term and irreversible adverse residual visual effects as a result of the operation of the scheme'.

Once again the wrong option has been considered by HE when comparing the visual impact of southern option7A against northern option 7B. The hamlet of Marazanvose will not become an island between the old and new A30 as both roads would, under northern option 7B, run to the north, with only a little used cul-de-sac to the front serving only the hamlet (hence being the preferred route by the majority of the residents)

<u>Noise</u>

The narrative suggests that noise modelling took place as part of the route selection, but it the methodology is not clear. Typically a noise map would be produced with +/- DB readings shown. This doesn't appear to be the case.

As stated above the noise modelling appears to compare the incorrect northern route with the preferred route, quoting a noise source on both sides of the 5 dwellings at Marazanvose.

The conclusion appears to be at odds with both the views of the residents of Marazanvose (as stated in 7.1.14) and the detailed drawings provided.

Looking at the maps provided at Deadline 3 it would appear

- Option 7B would position both the local road and new trunk road further from all 9 (or 10 including Grooms Cottage) dwellings in Marazanvose, suggesting noise impacts would be less than the preferred southern route.
- The narrative suggests that Hill House would be worse off with northern option 7B although the maps suggest no difference in the outcome. (It should be noted the route selected caused the owners of Hill House to submit a blight claim and reluctantly move out)

Commented [WT2]: Set out document description in full

- In HE's response to NF's relevant representation, the dwelling at St Freda is quoted as worse off with northern option 7B yet the alignment appears to be, if anything, slightly more favourable with this option. This is also the case for The Lodge House and Chyverton.
- Again, only 2 dwellings are referenced south of the current A30 but 5 will be impacted (2 removed, and 3 significantly worse off)
- A 3m acoustic fence provided as part of the preferred route would benefit <u>all receptors</u> in Marazanvose, not just the 3 remaining dwellings still situated to the south. There is no noise mitigation planned for the northern side of the new dual carriageway This should have been factored into any noise analysis.

Living Standards

It would appear that HE's flawed noise assessment has also been used to assess Living Standards for the residents of Marazanyose

The Northern route moves both the dual carriageway and local road to the north of the dwellings, a greater distance away than the preferred route. This option converts the old A30 into a cul de sac with access only traffic of the hamlet of Marazanvose. This would be a life changing scenario for all of the residents. We can only assume that HE's team were still comparing the incorrect northern route so did not pick up on this significant benefit.

The preferred route maintains the existing A30 only a few metres from the 5 dwellings at Marazanvose whereas the northern route moves both the A30 <u>and</u> the local route much further away from these dwellings. Safety, as well as noise are of great concern.

Conclusion

Whilst it is argued that southern 7A performs better in terms of cost, risk of delay and land acquired it should be noted that;

- Estimated cost The return on investment (Nancarrow alone generates around £2-2.5 million a year to the local economy) on any additional cost would be significantly faster than the scheme, demonstrating it would be a wise investment, as well as better delivering the scheme aims. Any cost implications for the scheme would be far less than the significant financial and reputational implications for our business'
- Risk of delay only marginal differences were identified so would presume this is of lower priority considering the many challenges within the wider scheme.
- Land acquired as stated, less strategic land would be required, and local arrangements for land reconfiguration had correctly been noted. Affecting 5 land holdings should be seen as a positive as it would avoid significant damage to anyone's farm or business.

Cultural Heritage - HE did not fully consult Historic England or Cornwall Council's Historic Environment Team prior to their route selection process against the advice of The Planning Inspectorate.

As previously submitted, it is clear that the majority of pertinent issues support northern Option 7B (the northern route) as the best performing option.

- Visual Impact The narrative would appear to suggest that the incorrect northern route was assessed leading to an inaccurate conclusion.
- Noise All receptors are further from both local and dual carriageway with equivalent noise
 mitigation (3m acoustic fence) benefitting all 9/10 dwellings in the hamlet not just those left
 to the south. The incorrect Northern route appears to have been used as a comparison
 again.
- **Living Standards** A cul de sac offers life changing benefits to all residents in Marazanvose including noise, safety, access & community.
- **Business Impacts** Significant benefits to Nancarrow, Marazan Farm outweigh the land loss resulting from the northern alignment which can be mitigated.
- Residential demolition 2 dwellings correctly noted in the assessment. It should also be
 noted that bypassing the hamlet would have created an environment much more suited to
 further development, addressing much needed housing in Cornwall.

As a result, we believe that an Issue Specific Hearing is fundamentally required in order to fully examine the route selection issues set out above and the significant business impacts of the submitted route for which development consent is being sought.

Furthermore, considering the number of flaws apparent in the route assessment process, a detailed, route comparison should be undertaken to;

- Assess the <u>correct</u> Northern route in terms of
 - o NOISE
 - o VISUAL IMPACT
 - o LIVING STANDARDS
- Properly engage Historic England with all the necessary information to assess in detail the impacts of both routes on all designated and non designated assets.
- Assess Business Impacts in terms of 'impacts on business' as a priority.