

From: [Les Stevens](#)
To: [A303 Sparkford To Ilchester](#)
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Subject: Deadline 6 Submission on behalf of the Parish Councils of Queen Camel, West Camel and Sparkford
Date: 01 May 2019 10:49:25
Attachments: [Parish Councils of Queen Camel West Camel and Sparkford - Deadline 6 Submission 01 05 19.pdf](#)

Dear Sir / Madam,

Please find attached a further submission from the Parish Councils of Queen Camel, west Camel and Sparkford as part of Deadline 6.

A response to the ExA'a further questions will follow by Deadline 6a.

Kind regards.

Les Stevens
Clerk to West Camel Parish Council

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JOINT SUBMISSION ON BEHALF OF THE PARISH COUNCILS OF QUEEN CAMEL, WEST CAMEL AND SPARKFORD – DEADLINE 6

The Parish Councils are both disappointed and confused by the response from the Applicant to your last set of Written Questions (ExA WQ2).

Disappointed in respect of the Applicant's refusal to provide the overlay drawing of Hazlegrove Junction you requested at the Issue Specific Hearings (ISH2) in February. We can only assume that had the Applicant done so, the points being made by the Parish Councils would have become transparently obvious to all parties, i.e. reduced land take, more efficient design, shorter, less complex journey times etc.

Confused in respect of our lack of familiarity with the DCO process and what appears to be a rather increasingly arrogant attitude expressed by the Applicant, where they appear to selecting which of your questions and request they are prepared to respond to?

Clearly by this stage of the process and as indicated by the tone and thrust of your written and verbal questions, you have, yourselves established the veracity of the points, repeatedly made by the Parish Councils, namely that;

The Scheme as submitted by the Applicant, has effectively ignored the Consultation Feedback from the formal bodies, i.e. the Parish Councils, who represent around 95% of the people (or 'receptors' as termed by HE) either side of the proposed scheme.

Sadly little account has been taken of the local experience and expertise offered, in a wholly constructive manner, by the elected representatives of our communities to the extent that the whole Consultation Process is, albeit retrospectively, now seen as a rather expensive 'paper' exercise, designed to meet yet another process 'milestone'.

Holistic Approach – the Applicant is solely focused on building a dual carriageway with sufficient junctions to service the perceived needs of local and commuting traffic. The adverse impact of their design on local communities both during and after construction doesn't appear to be considered worthy of a more sympathetic design approach. Similarly, the concept of creating an holistic design that leaves a legacy of short term mitigation and long term improvement for local communities, appears to fall well short of the Applicant's own Chief Executive, 'Jim O'Sullivan's mission statements'.

Business Impact – Again as you ascertained from the Issue Specific Hearings, the Applicant is unable to articulate any benefit to local businesses, beyond a decrease in journey time between points 'A' and 'B' (wherever they may actually be). Nearly all the local businesses along the length of the proposed scheme will suffer an adverse commercial impact, which in several cases will almost certainly result in their business failing. Had the Applicant been receptive to the Parish Council's call for relatively minor changes, the adverse impact on many of these businesses could have been mitigated to the point where they may well have a future.

Inconsistency of Approach – We again draw comparison to a similar scheme in Cornwall where the Applicant is dualling a section of the A30 between Chiverton and Carland Cross. Their Consulting Engineers, Arup, appear to have taken a much more transparent approach,

publishing cost comparisons between various options, something the Applicant and Mott-MacDonald have declined to do so in any coherent detail.

<https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/TR010026/TR010026-000165-6.2%20ENVIRONMENTAL%20STATEMENT%20CHAPTER%203%20CONSIDERATION%20OF%20ALTERNATIVES.pdf>

We also draw the Inspectorate's attention to the D6 submission from Mr Keith Tingey which provides further detail on the inconsistency of Highways England's approach to similar schemes.

Alternative Scheme Designs – We hope the Inspectorate appreciate that the Parish Councils, working with Mr Bryan Norman, commissioned Fairhurst Consulting Engineers to produce robust 'proof of concept' drawings in an effort to persuade an unreceptive Applicant to accept that more cost effective, less intrusive and holistic options are wholly viable.

These plans were never intended to be a complete design. Parish Councils simply don't have access to virtually unlimited public funds, as Highways England appear to.

The Applicant has opined that these plans are '**Inchoate**' and termed them a ' **cursory sketch**', which is both an insult to the community whose precepted tax contributions, actually paid for these professionally produced drawings.

We firmly believe that the Applicant can easily provide the overlays requested and their refusal to do so, is simply that it would demonstrate that alternatives to save considerable RPG areas are possible and readily deliverable. We believe this is why the Applicant will not comply, as they have ignored this avenue since the commencement of this process. The three Parishes firmly believe the design proposed was 'set in stone' prior to any consultation taking place, and NO alternatives, and reasons for rejection have ever been publicised.

The proportional significance of undertaking this investment, to provide professional, 'proof of concept' drawings, on behalf of all our communities, is testament to how committed all three Parish Councils are to achieving a better design that mitigates adverse impact for all A303 road users and leaves behind a long-term solution that serves our communities and the whole of South Somerset for decades to come.

We draw the Inspectorate's attention to Mr Bryan Norman's latest submission and in particular the latest drawings produced by Fairhurst Consulting Engineers, which conclusively show that sufficient room does exist to fit in both the proposed dual carriageway and LPR (Local Parallel Road) to DMRB standards!

In Conclusion – The three Parish Councils have consistently supported the need to dual this section of the A303 and have sought to work constructively with the Applicant and their Consulting Design Engineers, Mott-MacDonald.

However, the Consultation simply hasn't been the reciprocal process we believed it should have been (or indeed was intended to be), with the Applicant becoming 'entrenched' in their inflexible design concept very early on in the whole process.

Sadly, we believe, the only recommendation available to the Inspectorate has to be a resounding 'B minus', could have done better, could have listened to local advice, could have thought about local businesses and most importantly could (with a little more effort) have design a better solution that meets the needs and rights of local people.

Given recent national press coverage regarding Highways England reassessing their proposed programme against 'value for money to the taxpayer', this scheme as currently designed surely falls well short of the standards espoused by Highways England and most definitely the reasonable expectations of the local population.

Les Stevens

On behalf of the Parish Councils of Queen Camel, West Camel and Sparkford.