

The Highways England (M27 Southampton Junction 8 Improvement Scheme- M27 Junction 8 and Windhover Roundabout) (Special Road) Side Roads Order 2021

The Highways England (M27 Southampton Junction 8 Improvement Scheme- M27 Junction 8 and Windhover Roundabout) (Special Road) Compulsory Purchase Order 2021

Highways Act 1980
and
Acquisition of Land Act 1981

NOTES FOLLOWING THE VIRTUAL PRE-INQUIRIES MEETING

Held at 10:00 hrs on 26 January 2022

1. Introduction

- 1.1. At the start of the Pre-Inquiries Meeting, the Inspector welcomed all present and introduced himself as **Mr Ian Jenkins** (BSc(Hons) CEng MICE MCIWEM). He has been appointed by the Secretary of State for Transport to conduct concurrent Inquiries into the 2 Orders referred to above, on the basis of which he will report to the Secretary of State.
- 1.2. **Mrs Yvonne Parker** has been appointed as the Programme Officer for the Inquiries. Her role is to act as an impartial officer of the Inquiries, responsible to the Inspector. She will take no part in anyone's case. Her main duties, under the direction of the Inspector are:
1. Acting as the link between participants and the Inspector;
 2. Keeping records of those attending the pre-Inquiries meeting and Inquiries;
 3. Organising and keeping under review the Inquiries programme;
 4. Organising practical arrangements for the Inquiries, including co-ordinating and advising on appearances;
 5. Co-ordinating the receipt and distribution of documents;
 6. Holding a master set of all documents (inc. Inquiries website Library) and maintaining document lists; and
 7. Planning site visits.

She will play no part in the Inspector's report to the Secretary of State beyond helping with the collation of lists of those appearing at the Inquiries and of Inquiries documents, which will be appended to it.

- 1.3. The Programme Officer's contact details are given below:
- Telephone no.: 01282 450522

- Mobile no.: 0781 3334305
- Email address: yvonneparker@programmeofficers.co.uk
- Address: 2 Priory Court, Burnley, Lancashire, BB11 3RH.

2. Purpose of the public Inquiries

- 2.1. The purpose of the Inquiries is to enable the Inspector to gather evidence before making his report to the Secretary of State. In his report he will set out the gist of the evidence given to the Inquiries and recommend whether, in each case, the Order should be confirmed, should be modified and confirmed or it should not be confirmed.

The Secretary of State will consider the Inspector's report before deciding what action to take on the Orders.

- 2.2. The Inquiries will hear representations concerning the above Orders in light of, but not limited to, objections which have been made and not withdrawn, of which there are 3 currently (OBJ/3, 6 & 7).

3. Purpose of the pre-Inquiries meeting

- 3.1. The meeting was to enable all concerned to discuss procedural matters relating to the Inquiries, which are due to open on 10 May 2022. This should help everyone to make the best use of their time between now and the Inquiries, and help the proceedings to run smoothly.
- 3.2. There was no discussion of the merits of any of the cases for or against the Orders, as that will have to wait until the Inquiries formally open.

4. Parties present and appearances at the Inquiries

- 4.1. Details of those identified as representing parties at the pre-Inquiries meeting and their expected representation at the Inquiries are appended at Appendix 1.
- 4.2. The absence of any other party from the pre-Inquiries meeting will not of itself preclude their participation at the Inquiries.
- 4.3. At the Inquiries the Inspector will wish to hear from anyone who has a relevant point to make in connection with the Orders. Parties may appear at the Inquiries in person and may be represented by counsel, a solicitor or some other representative. However, when making a case, prospective participants should bear in mind that if a point is a good one, and is supported by relevant evidence, it needs to be made only once in order to carry weight. Repeating the point will not add to that weight, but will simply waste Inquiries time. With that in mind it may be that arguments for or against the Orders could be made more effectively and succinctly by one person/organisation than by many individuals making the same points in slightly different ways.

The Inspector urged parties/individuals to get together wherever possible to present joint cases through a single spokesperson. In order to ensure that the Inquiries are completed as expeditiously as possible, the Inspector will intervene to prevent any unnecessary repetition.

- 4.4. People who do not need or wish to speak at the Inquiries will, nonetheless, be welcome to attend as observers. In considering the Orders and associated matters, the Inspector will take account of all of the evidence heard at the Inquiries as well as written representations received before it closes. However, greater weight can be attached to evidence given at the Inquiries which is open to testing through cross-examination.

5. Inquiries venue

- 5.1. During the course of the pandemic, when prevented from meeting 'face to face', the Planning Inspectorate has been holding Inquiries in a virtual and occasionally blended format. However, it is currently anticipated, with the relaxation of restrictions, that the forthcoming Inquiries will be held 'face to face'. Nonetheless, National Highways indicated that it will be prepared to enable the Inquiries to proceed on a fully virtual basis without postponement, should the need arise.
- 5.2. The Inquiries will be held in the Highpoint Centre, Bursledon Road, Thornhill, Southampton, SO19 8BR.
- 5.3. In addition to the main Inquiries room, there will be a side room for the Inspector and workspace for the Programme Officer. Photocopying facilities will be available (the copy rate may be limited and a reasonable charge may be made for copying). If the parties who intend to appear at the Inquiries need particular facilities they should take the matter up with the Programme Officer.
- 5.4. In response to the Inspector's question on the subject, no one indicated that they expect to have any difficulty in engaging with the Inquiries 'face to face'. The Inspector asked that if any prospective participant has any concerns in that regard, they contact the Programme Officer as soon as possible, in order that the need for alternative arrangements for the individual can be considered.
- 5.5. Mr Keeling suggested that it would be helpful to be able to display some of the documents being referred to in evidence, such as drawings, on a large screen at the venue (using a laptop). A white board was also requested. **The Programme Officer will liaise with Mr Keeling and National Highways to establish the details and whether the facilities can/need to be provided for.**

6. Inquiries dates and times

- 6.1. The Inquiries are proposed to open at 10.00 hrs on Tuesday 10 May 2022. Based on time estimates provided by National Highways and

Mr Keeling, it is provisionally estimated that the Inquiries will sit for 12.5 days over 4 weeks. More on this below in section 11.

- 6.2. The Inquiries will generally sit at the following times:
- on the first day- 10.00 hrs to about 17.00 hrs;
 - thereafter- 09.30 hrs to about 17.00 hrs; and,
 - with a break for lunch at around 13.00 hrs, and a shorter break at a convenient point mid-morning and mid-afternoon.
- 6.3. Once the Inquiries are underway the Inspector may decide to start earlier and/or finish later. Any changes to sitting times will be announced at the Inquiries.

7. Inquiries procedure and site visits

Inquiries procedure

- 7.1. The Inquiries will be conducted with reference to the *Highways (Inquiries Procedure) Rules 1994* and the *Compulsory Purchase (Inquiries Procedure) Rules 2007* (to the extent applicable). In general terms, this will involve the formal presentation of evidence by witnesses followed by questions in the form of cross-examination and re-examination. Whilst the Inspector may decide to change the order of appearances at a later date to suit changing circumstances, such as witness availability, at this stage he envisages that the Inquiries will proceed as follows:

1. The Inspector's opening announcements and preliminary matters;
2. He will invite National Highways to make a brief opening statement, outlining its case, followed by the objectors;
3. The parties may then give evidence in turn beginning with each of the witnesses for National Highways. The evidence of each witness will be open to cross-examination by opposing parties (who have given or will give evidence) and there may be re-examination to clarify answers given in cross-examination. The Inspector may put questions he has at any stage. They will be followed by witnesses for other supporters of the Orders and then witnesses for the objectors and finally any other interested parties.

Although not encouraged (see paragraph 9.18), if new matters are raised in evidence at the Inquiries by any objector, National Highways will have an opportunity to present rebuttal evidence after that party;

4. There will be a session to allow discussion of any proposed modifications to the Orders;

5. Each party who has given evidence may make closing submissions, summarising their cases in light of the evidence. This is not an opportunity to introduce new evidence. Closing submissions at the end of the Inquiries will be heard in the following order: other interested parties; objectors; supporters; and finally, National Highways;
6. Before making his closing announcements, the Inspector will make any necessary arrangements for any final site visits; and,
7. The Inspector's closing announcements.

Site visits

- 7.2. The Inspector will familiarise himself with the land subject of the Orders and the surrounding area prior to the Inquiries, and may make further site visits during and/or after the Inquiries. The Inspector emphasised that all visits would be for the sole purpose of observing the sites in question. He will not hear any evidence from the parties to the Inquiries on site or receive submissions on site. It is important that all that has to be said in evidence should be put at the Inquiries.
- 7.3. The views of participants regarding the need for such visits were invited and the Inspector asked that any suggestions be forwarded to the Programme Officer. Arrangements would be made as necessary through the Programme Officer and announced later.
- 7.4. At the last PIM the previous Inspector requested a suggested site visit itinerary from the parties, which has been provided by National Highways and is posted on the website. Mr Keeling indicated that he has some suggested additions to the itinerary, which will be passed to the Programme Officer.
- 7.5. Furthermore, Mr Keeling recommended that the Inspector undertake an accompanied site visit prior to the Inquiries, as parts of the land subject of the Orders, which would be referred to in evidence, are not easily seen from public vantage points. National Highways and Mr Keeling agreed to liaise with the Programme Officer to see whether access and arrangements for that visit can be put in place. Mr Keeling asked that the following dates be avoided: 1, 3, 4 and 11-22 April, and 4 May.
- 7.6. It was identified that National Highways and Mr Keeling would be able to provide access to the land subject of the Orders to the northeast of junction 8. However, Mr Keeling also recommended that the Inspector see the continuation of the watercourse to the southeast of that junction, which would necessitate access to land owned by another party. National Highways confirmed that it would try to arrange access to that area.

- 7.7. Mr Keeling indicated that in advance of the proposed accompanied visit, his team would mark out the extent of the land subject of the Orders to the northeast of junction 8. At the Inspector's request, Mr Keeling agreed that National Highways would be given an opportunity to check/agree that setting out before the visit.
- 7.8. The Inspector indicated that the proposed accompanied site visit would need to be attended by a representative of National Highways and a representative of Mr Keeling as a minimum. Other interested parties would be welcome to attend, subject to landowner consent. If others do want to attend they should notify the Programme Officer as soon as possible.

8. Main issues and Statements of Common Ground

Main issues

- 8.1. In considering the proposed Compulsory Purchase Order, the Inspector will wish to ascertain whether there is a compelling case in the public interest and the purposes for which the Compulsory Purchase Order has been made sufficiently justify interfering with the human rights of those with an interest in the land affected. In relation to these matters reference will be made to *Guidance on compulsory purchase process and The Crichel Down Rules, 2019 (Core document F.13)*, which draws attention to, amongst other things, the following:
1. Particular consideration should be given to the provisions of Article 1 of *the First Protocol of the European Convention on Human Rights* and, in the case of a dwelling, Article 8 of the Convention.
 2. The Acquiring Authority (AA) should have a clear idea of how it intends to use the land it is proposing to acquire;
 3. The AA should show that all the necessary resources are likely to be available to achieve the scheme purpose within a reasonable time-scale; and,
 4. The AA should be able to show that there is a reasonable prospect of the scheme going ahead, and that it is unlikely to be blocked by any impediments to implementation.
- 8.2. In considering the proposed Side Roads Order the Inspector will wish to ascertain whether any relevant requirements of the associated sections of the Highways Act 1980 have been met: For example, Section 125¹. That is:
- In relation to the stopping up of private access to premises, that: no means of access to the premises is reasonably required; or, that another reasonably convenient means of access to the premises is available or will be provided in pursuance of an order made by virtue of section 125(1)(b) or otherwise.

¹ Section 125(3) of the Highways Act 1980.

- 8.3. The Inspector asked all parties to have particular regard to these matters, and to address explicitly all matters identified that are relevant to them in the presentation of their evidence. However, he stressed that the above list is not exhaustive and it does not preclude other matters from being raised if relevant.
- 8.4. The Inspector drew attention to the legal submissions set out in Mr Keeling's '*Objector's outline Response to National Highways' Statement of Case*' (Core document H.2). The Inspector indicated that it would help him and other participants in preparing for the Inquiries, if National Highways would set out its position as to the relevant legislative/legal framework, making clear any areas of disagreement with the associated sections of core document H.2.
National Highways agreed to set out its position, which will be submitted to the Programme Officer by 17.00 hrs on 11 March 2022. In the event that Mr Keeling or other objectors consider it necessary to respond, they will submit their responses to the Programme Officer by 17.00 hrs on the 31 March 2022.
- 8.5. The Inspector requested that National Highways respond explicitly to every objection in its written evidence, including those not the subject of further representations at the Inquiries.

Statements of Common Ground

- 8.6. The Inspector noted that National Highways has agreed Statements of Common Ground with Mr Carnell (Core documents K.1) and with Wates Developments Ltd/Cranbury Estates.
- 8.7. National Highways and Mr Keeling agreed to restart work on a Statement of Common Ground, which had stalled. The Inspector recognised that in cases of this kind there is sometimes limited scope for formalising Statements of Common Ground. Nevertheless, it will be in the interests of the parties to reach agreement on as many issues as possible, thereby enabling them to focus on matters of particular importance to them at the Inquiries. To that end the Inspector asked the parties to work towards producing an agreed Statement of Common Ground by early April. **Following the meeting the parties agreed that their Statement of Common Ground will be submitted to the Programme Officer by 5 April 2022.**

9. Nature, format and submission of evidence

Statements of Case

- 9.1. The Inspector noted that Inquiries evidence submitted to date has been posted on the Inquiries website administered by the Programme Officer at:

<https://programmeofficers.co.uk/M27J8/>

In the run up to and during the course of the Inquiries, any further evidence submitted will also be posted there.

- 9.2. In response to the Inspector's question, none of the parties present at the meeting indicated any difficulties in accessing the Inquires library on the website.
- 9.3. National Highways Statement of Case indicates that, where possible under Government guidance, documents will be available for inspection at Hedge End Library and Thornhill Community Library. The Inspector recognised that during the pandemic reliance has been placed on website based document libraries, as hard copy documents in public libraries have not been accessible for much of the time. The Inspector asked National Highways to confirm the current position as regards the availability of documents at the local libraries. Mr Reed asked that if local libraries are to be used in the run up to the Inquiries, consideration be given to the use of Bursledon Library.
- 9.4. Following the meeting, National Highways confirmed that 'hard copies' of the Orders and its Statement of Case remain available for Inspection at two of the three locations identified in its Statement of Case; Hedge End Library and its offices in Guildford. The third location, Thorn Hill Library, has asked for the documents to be removed from there. National Highways response in relation to the use of Bursledon Library instead is awaited.

Core Documents

- 9.5. It is likely that some documents will be referred to by many parties at the Inquiries. Conventionally the 'common' documents are referred to as core documents. Many of these documents have already been submitted and a list has been published on the Inquiries website. The Inspector would welcome suggestions, through the Programme Officer, for any further documents that could usefully be included as such in the published list of core documents. The Programme Officer will maintain the schedule of core documents.
- 9.6. It will save paper, time and expense if others wishing to refer to the core documents would simply refer to them (by document number and internal reference) in their evidence without the need to submit further copies.
- 9.7. The Inspector noted that at present listed core documents B29 and B30, which are Linsig files, cannot be accessed on the Inquiries website. It was agreed that as Mr Keeling intends to refer to the contents of those documents at the Inquiries, they need to be made accessible, either by hyperlink or by some other means.
The Programme Officer will liaise with National Highways/Mr Keeling to establish the most appropriate means of access and will update the website to suit.

Proofs of evidence

- 9.8. Where a party (whether National Highways, statutory objectors or others) proposes to give evidence at the Inquiries by reading from a document (known as a 'proof of evidence'), it must be submitted to the Programme Officer in advance of the Inquiries.
- 9.9. Proofs should be as succinct as possible, avoiding unnecessary or extraneous material which only serves to obscure the key points to be made. Additional evidence may be given orally, though as far as possible such material would better be included in proofs.
- 9.10. In accordance with the Inquiries Procedure Rules, if the proofs are longer than 1500 words, summaries of the proofs must be submitted at the same time as the proofs themselves. Summaries should be no more than 1500 words. Only summaries will be read at the Inquiries, but the full proofs will count as evidence and be open to cross-examination.
- 9.11. If, in evidence, reference is made to any other document, which is not included in the list of core documents, a copy of that document (or the relevant extract plus the cover page), must be submitted as an appendix to the proof of evidence. Those who wish to rely on material from the internet must provide printed copies of the material in question, as the content of websites can change and it is important that the Inspector and the Secretary of State see the information the witness intends them to see.
- 9.12. The Inspector noted that a series of proofs of evidence and rebuttal proofs of evidence were submitted by National Highways and Mr Keeling prior to the postponement of the Inquiries in November 2021. They are posted on the Inquiries website. The notice notifying the parties of the rearranged date for the Inquiries confirmed that those proofs would be carried forward and taken into account when the Inquiries open.
- 9.13. The Inspector identified that the proofs submitted on behalf of Mr Keeling did not include the necessary summaries. **Mr Keeling agreed to provide them by 19 April 2022.**
- 9.14. The Inspector asked whether anyone anticipated the need to add to or modify the submitted proofs:
- National Highways confirmed that its Highways, Ecology and Overview witnesses were no longer available. Replacement witnesses have yet to be appointed. National Highways indicated that the associated proofs will be re-issued in the names of the new witnesses. Whilst it is hoped that they will be able to adopt the contents of the existing proofs as their own, if some changes are necessary, they will be shown as tracked changes for ease of reference. **National Highways will submit those 3 proofs of evidence and any associated**

documents to the Programme Officer by 17.00 hrs on 19 April 2022.

- In the event that Mr Keeling considers it necessary to address any of the tracked changes referred to above by providing a rebuttal proof(s), **the rebuttal(s) will be submitted to the Programme Officer by 17.00 hrs on 29 April 2022.**
- Mr Keeling indicated that he intends to provide an errata in the form of a **Linsig output update table, which will be submitted to the Programme Officer by 17.00 hrs on 19 April 2022.**
- With reference to paragraph 12.13 of Mr Moore's proof of evidence (KEE/1/1)-Mr Keeling confirmed, after the meeting, that he does intend to submit **the further modelling evidence referred to. It will be submitted to the Programme Officer by 17.00 hrs on 19 April 2022.**

9.15. Mr Carnell confirmed that he wants to give evidence at the Inquiries. The Inspector confirmed that **any associated proof of evidence (including reference documents and summary as necessary) should be submitted to the Programme Officer by 17.00 hrs on 19 April 2022.**

9.16. With reference to the evidence from objectors referred to above with a 19 April 2022 submission date; in the event that National Highways considers it necessary to address that new evidence by rebuttal proof(s), **the rebuttal(s) will be submitted to the Programme Officer by 17.00 hrs on 29 April 2022.**

Written Representations

9.17. The Inspector requested that if anyone intends to submit additional written representations rather than appearing at the Inquiries, they should be submitted to the Programme Officer not later than **17.00 hrs on 19 April 2022.**

9.18. Mr Reed confirmed that it is his intention to provide a written representation supporting the proposed highway scheme in principle.

Late representations

9.19. Everyone has a responsibility to meet the deadlines set for the submission of evidence. The procedure is designed to secure maximum disclosure and exchange of information before the Inquiries takes place, so the proceedings can be conducted efficiently and effectively. The Inspector will seek to ensure that no one gains a tactical advantage by deliberately withholding evidence until a late stage. For example, if late evidence is accepted, it may be necessary, if requested, to adjourn the Inquiries in order to give others the opportunity to consider that new evidence and prepare to deal with it.

Copies

- 9.20. Those submitting documents to the Programme Officer, as set out above, should first contact her to establish the number and type (hard copy and/or electronic copy) required as well as the necessary circulation list.

Opening, closing and legal submissions

- 9.21. Those making closing submissions must provide the Inspector with a copy of these before they are read out at the Inquiries. These should if possible be drafted with a view to incorporating them into his report as the case for the party concerned. However, the Inspector reserves the right to edit them and to add material drawn from evidence given orally or in documentary form. It would be helpful if copies in an unprotected electronic form could also be provided to the Programme Officer.
- 9.22. The Inspector also requires a copy of any legal submissions to be made and it would also help him if a copy of the texts of opening submissions would be provided at the time of delivery.

10. Document numbering

- 10.1. All documents submitted to the Inquiries should be numbered in accordance with the document numbering system that has been established by the Programme Officer. Please, contact her for details.

11. Inquiries Programme

- 11.1. Prior to the postponement of the Inquiries last year, National Highways and Mr Keeling submitted details of their proposed witnesses and provided time estimates for evidence. The Inspector has used that information to compile the first draft of the Inquiries programme, which indicates that the Inquiries will need to sit for 12.5 days between the 10-31 May. The draft programme was discussed.
- 11.2. National Highways indicated that its flooding witness, Mr Ball, would not be able to attend in person after 25 May 2022. However, it was noted the first draft programme indicates that Mr Keeling's flooding witness (Mr Moore) would appear on the 27/30 May, when Mr Ball will not be available to provide technical support to Counsel for National Highways. National Highways confirmed that other personnel could be organised to support its Counsel when hearing Mr Moore's evidence. However, if Mr Moore raises new matters in oral evidence, albeit that that should not ordinarily be the case, National Highways would not be in a position to recall Mr Ball immediately to deal with it.
- 11.3. In the Inspector's experience it is not unusual to hear evidence on technical matters, such as flooding and highways, on a topic basis, rather than hearing the full case of one party before another, without

prejudicing anyone. Therefore, he asked whether the availability issue might be resolved in this instance by calling Mr Moore to give evidence straight after Mr Ball, with the first draft programmed order otherwise unchanged. Whilst there were no objections to that approach at the meeting, it was left to the parties to consider further. After the meeting Mr Keeling expressed a preference for a purely case-by-case approach. This matter remains under discussion/review and will be revisited between 19 April 2022 and the opening of the Inquiries, if not before.

- 11.4. The draft Programme will be available on the website and in the Inquiries Library when the Inquiries are sitting. It will remain in draft and be subject to change before and during the Inquiries. It is important that people appearing are available when required, and the onus will be on them to keep in touch with the progress of the Inquiries. If they are not at the venue when required, the Inquiries may proceed without them.

12. Other matters

Past correspondence

- 12.1. The Inspector indicated that whilst he is aware that following the postponement of the Inquiries there has been some correspondence between the parties/the Programme Officer/the previous Inspector/the Planning Inspectorate, he has not been party to it. He confirmed that from 26 January 2022 onwards, any procedural queries raised will be directed to him by the Programme Officer.

Proposed modifications to the Orders

- 12.2. The Inspector confirmed that the starting point for the Inquiries is the Orders as originally published. Any proposed changes would need to be clearly documented and justified in advance of the 'Order modifications' session, which has been included in the draft Inquiries programme.
- 12.3. National Highways indicated that it does not intend to propose any modifications at present.
- 12.4. Furthermore, National Highways confirmed that whilst the scheme design changes detailed in core document A.10 (changes between PCF stage 3 and stage 5) involve changes to the purpose for which some parts of the land subject to the Orders would be used, there are no consequential changes to the Orders as published.

Alternatives promoted by others

- 12.5. The Inspector indicated that insofar as alternatives are promoted by others to the scheme subject of the Orders, he will expect National Highways to provide a written evaluation of: the merits and practicability of any alternative proposed, whether it would meet the

aims and objectives set for the original scheme, taking into account its costs and benefits and comparative impacts, such as on adjoining landowners; and, whether or not the alternative would overcome or sufficiently mitigate some deficiency in the Order proposals that would otherwise render it incapable of passing the necessary tests. This is in order that he will be in a position to conclude on whether an alternative merits further investigation.

- 12.6. The Inspector noted that Mr Keeling has promoted a number of alternatives in the evidence submitted (e.g. KEE/3/1 para 4.1). **National Highways indicated that whilst it addresses a number of alternatives in its rebuttals, it would check to ensure all have been adequately covered. If a supplementary submission is necessary, it will be sent to the Programme Officer by 17.00 hrs on 19 April 2022.**

Core documents A.6, A.9, A.10-queries

- 12.7. The Inspector identified that whilst the title of A.6 refers to drawing no. 50008, it appeared not to be in the bundle nor was it included in core document B.4. Furthermore, it doesn't include drawing no. 0004, which core document A.10 identifies as the drawing relevant at stage 3. He asked National Highways to provide a schedule identifying which scheme drawings were relied upon when the Orders were published and then at key stages thereafter. **National Highways confirmed that it will send a schedule to the Programme Officer by 4 February 2022.**
- 12.8. National Highways indicated that the current scheme, which shows the use to which the land subject of the Orders would be put, is illustrated by the stage 5 drawings (A.9). This supersedes previous designs.

I Jenkins

INSPECTOR

31 January 2022

APPENDICES

Appendix 1-Appearances

National Highways		Acquiring Authority and Orders Promoter
Rep at PIM	Mr Mark Westmoreland-Smith of Counsel	
Rep at Inquiries	Mr Mark Westmoreland-Smith of Counsel	
1) Traffic and Economics 2) Highways 3) Flooding 4) Landscape 5) Noise 6) Ecology 7) Land acquisition 8) Planning 9) Overview		

Supporters

Mr Eric Reed Bursledon Rights of Way and Amenities Preservation Group		
Rep at PIM	Mr Reed	
Rep at Inquiries	n/a	
Relying on written representations		

Objectors

Mr Mark Keeling		OBJ/7
Rep at PIM	Mr Christiaan Zwart of Counsel	
Rep at Inquiries	Mr Christiaan Zwart of Counsel	
1) Planning 2) Transport Planning 3) Flood and Highways Engineering		

Objectors (continued)

Mr Paul Carnell		OBJ/3
Rep at PIM	Mr Paul Carnell	
Rep at Inquiries	Mr Paul Carnell	
1) Highways		