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# North Essex Authorities Shared Strategic (Section 1) Plan

## Further Hearing Sessions January 2020

### Hearing Statement

by

Andrew Martin – Planning Limited

on behalf of

Crest Nicholson Operations Ltd, R.F. West Ltd,  
Livelihoods and David G Sherwood

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Matter 6 – Transport & Other Infrastructure

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### MATTER 6 – TRANSPORT & OTHER INFRASTRUCTURE

**Q.6** *What are the consequences of the answers to 3(a), (b) & (c) [relating to funding for the A12 to A120 widening scheme] for the feasibility of the West of Braintree and Colchester Braintree Borders GCs?*

**Q.7** *What are the consequences of the answers to 4(a) & (b) [relating to funding for the A12 in the Marks Tey area] for the feasibility of the Colchester Braintree Borders GC?*

1. Paragraphs 32-37 of the Inspector's Post Hearing Letter to the North Essex Authorities (NEAs) (IED011), 8<sup>th</sup> June 2018, are particularly relevant to these questions. In relation to trunk road improvements Policy SP5 includes the two major trunk road schemes in its list of strategic infrastructure priorities: the A12 Chelmsford to A120 widening scheme which is included in the committed Highway England RIS1 programme, and the A120 Braintree to A12 dualling scheme which is currently under consideration for inclusion in RIS2. The Inspector found that the scale of the GC proposals means that they could not be developed in full without the additional strategic road capacity provided by these schemes. The Inspector's thoughts in this respect are set out at Appendix 1.
2. Although the funding for the initial A12 widening scheme is committed via Highway England's Road Investment Strategy (RIS) 1 programme, this is not the case for the potential revised realignment of the A12 in the Marks Tey area. Highways England's consultation on alternative route options near Marks Tey only ended on 1<sup>st</sup> December 2019 and a decision on the preferred revised alignment, along with a further public consultation on the A12 widening scheme as a whole, is not expected before Summer 2020. Although the NEAs are confident that a favourable decision to their HIF bid will be successful and is imminent, at the time of writing the outcome is unknown and remains uncertain given the General Election.
3. No funding has been confirmed for the A120 dualling scheme and its ability to proceed will be dependent on whether or not the Department for Transport (DfT) decides to fund the scheme through the RIS2 programme. It is unclear when this decision will be made.
4. The Inspector was clear at paragraph 37 of IED011 that "... greater certainty over the funding and alignment of the A120 dualling scheme and the feasibility of realigning the widened A12 at Marks Tey is necessary to demonstrate that the GC proposals are deliverable in full." However, there is still no further information available.
5. With this in mind, it would be prudent to identify additional growth sites to boost the overall supply of housing land and to make the Plan (as a whole) more resilient to changing circumstances, including future infrastructure funding decisions and viability constraints at the new GCs. The Representors have consistently promoted land at Marks Tey for around 1,000 homes and associated retail and community facilities. Such a scheme could be designed and developed on Garden City principles and can be made to work either as a standalone development, or as an early phase of a larger GC when sufficient funding is secured for the major strategic infrastructure. The land interests of the Representors can



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feasibly feature in both scenarios and could be planned not to prejudice the A12 realignment. Indeed it could through effective masterplanning secure a reserved corridor for the final selection. A scheme for around 1,000 homes can be accommodated within the spare capacity of the existing highway network, subject to some localised improvements to the Prince of Wales roundabout and other local junctions. Consequently, the scheme would allow for the opportunity to plan a sustainable urban extension to Marks Tey either as a standalone development or as an interim phase of the CBBGC.

6. Also of particular relevance to Q6 is the fact that the AECOM 'Infrastructure Planning, Phasing and Delivery' Report (EB/088/47) includes at 4.2 an indicative masterplan and land use budget that varies considerably from the previous Concept Framework (DLA 2017) at 4.1, which is the same plan referred to by the Inspector in paragraph 35. As stated in our main representations to EB/088/47, the Representors have serious concerns about the AECOM indicative masterplan because, in summary:
  - a) the realignment of the A12 as shown would cause severe adverse effects on their land and associated proposals. It would substantially reduce the potential development opportunities and its viability of delivering housing and associated community-related facilities on land to the south east of the existing A12 route;
  - b) the overall impact is demonstrated on the plan at Appendix 2 (drawing no. 17012\_16a), which demonstrates the substantial loss of potential development land. The AECOM report acknowledges this: *"this has the effect of removing land that was previously considered for development"*;
  - c) as a consequence, the Land Use Budget at Table 7 shows a reduced overall capacity of 20,930 dwellings compared with the Policy SP9 maximum of 24,000 homes;
  - d) there has been no attempt by the NEAs or AECOM to engage on the revised indicative masterplan;
  - e) the A12 alignment shown on the indicative masterplan is one of four options subject to HE consultation. It prejudices and undermines the transparency and robustness of the consultation process. It is not appropriate and is premature at this stage of the emerging Local Plan to show a preferred route on a masterplan until the HE consultation has run its full course and a final decision on the preferred alignment has been taken;
  - f) the indicative masterplan fails to show how the proposed new GC would integrate with the existing Marks Tey settlement. The existing settlement is not shown on the plan and the hub of the station/RTS route appears to be out on a limb, divorced from the existing community. This is not only misleading and fundamentally flawed, but perverse;
  - g) Section 4 of the AECOM document therefore has no evidence base to justify the indicative masterplan and land use budget.
7. Consequently, for all the above reasons, Section 4 of the AECOM report should be withdrawn from the evidence base.



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8. The Representors have submitted a response to the recent HE A12 realignment consultation, refer to Appendix 3. This confirms for the reasons set out therein that the Representors' first preference is Option D followed by Option B.
9. Although it would be possible to produce a masterplan that shows the Representors land and the wider GC integrated with the existing settlement, the appropriate time for that to happen would be once the preferred route for the A12 realignment near Marks Tey has been announced and after the Section 1 Plan has progressed towards adoption. In other words, further masterplanning should be a matter for the site-specific DPD stage.

***Q.11 Is the approach to the phasing of infrastructure provision at the GCs, set out in the AECOM IPPD document, justified and appropriate?***

10. Section 4 of the AECOM report is not currently justified or appropriate. Although the Representors recognise and support the aspiration to deliver infrastructure as early as possible, this must be balanced against wider viability considerations and the timing of the need for each item of infrastructure. For example, there is no point in fully opening a new school before there are sufficient pupils to fill it. Doing so could enable pupils from further afield to take up the new school places and in turn deny some future residents a place at a local school. Furthermore, other infrastructure, such as sports facilities, community centres and equipped play areas, are often best planned in collaboration with the new community who will use them. This is to ensure that they have a say in what is provided in their local area, rather than presenting them with a fait accompli.
11. By reconsidering the phasing of some of the infrastructure in the AECOM report, the viability of the overall GC could be improved. Overall the delivery of infrastructure should coincide with the delivery of housing.

***Q.12 Would an alternative approach to phasing be preferable, such as that set out in the Infrastructure Delivery Plan by Create, submitted with the response to EB/088 from Carter Jonas on behalf of L&Q, Cirrus Land & G120?***

12. In accordance with paragraph 15 below, the appropriate time and place for phasing to be developed and established would be through site-specific DPDs (as policy envisages), which allow stakeholders, interested parties and the public the ability to assess the necessary infrastructure and phasing at each GC, and agree a collaborative approach to provision. This is preferable to trying to put together a phasing approach through the Section 1 Examination process, which does not provide the scope for full stakeholder and public participation and is primarily centred on fixing 'broad areas of search'.

***Q.13 (a) Are the Section 1 Plan's policies sufficiently clear about what infrastructure needs to be provided, and by when?***

13. Subject to the exception set out below, the Representors consider that the policy guidance for provision of both transport and community infrastructure as set out in both Policy SP5 and Policy SP9 are clear and set out a broad strategy to prepare a DFD that will provide details of what infrastructure is to be provided and by when. The second paragraph of Policy SP9 makes it clear that a Strategic



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Growth DPD will provide an appropriate framework and establish that the respective phases of development do not come forward until the necessary infrastructure has been secured.

14. The exception is that in Policy SP9 reference to Marks Tey rail station being relocated to a more central location within the GC in items 7 and 11 should be deleted, given that this is no longer proposed by the NEAs following further investigation.

**(b) Should the Plan's policies require funding for key infrastructure to be committed before planning permission is granted for any of the GCs?**

15. It follows from the above that the DPD will be drafted to ensure that future planning applications (and subsequent planning permissions) should demonstrate that development can only come forward if the necessary infrastructure can be secured on a phased basis in accordance with the DPD.

**(c) Should the Plan's policies link the phased provision of infrastructure to defined trigger points in the phasing of development at the GCs?**

16. The Representors consider that policies should link the phased provision of infrastructure to defined trigger points in the phasing of the GCs, but this would be more appropriate when more detail and evidence is available. Hence it is considered that this is a matter to be incorporated within the proposed DPD.

#### **Other Infrastructure and Phasing**

*Please note that the following responses have been prepared by Royal HaskoningDHV.*

#### **Rapid Transit for North Essex**

**Q18. How would connecting public transport services within the proposed garden communities be funded?**

17. The Rapid Transit System (RTS) as proposed within the "From Vision to Plan" document, states in section 4.1.4 how the RTS would connect to public transport services. Reference is made to: *"While the RTS will serve the main centres of activity and homes on garden communities, it is expected that distributing public transport services would be introduced on garden communities when they reach their full size. It is expected that these services would be on-demand with the potential for early adoption of fully autonomous vehicle technologies when and if available. Provision for these secondary distributor routes is, however, being made in the design of garden communities."*
18. The From Vision to Plan document, states in terms of operational viability and proposed funding: *"it is less likely that ongoing operational support will result from developments, aside from initial 'pump priming' funding and farebox revenue. It is therefore important that the service is operationally viable – ultimately capable of operating with little or no subsidy."*
19. The statement that distributing public transport services would be expected to be introduced on GCs when they reach their full size is fundamentally flawed in attempting to deliver an operational viable public transport service. It is acknowledged that a critical mass of housing would need to be delivered



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to provide sufficient patronage to provide fare revenue for the RTS and connecting public transport services. However, introducing connecting services following completion of the GCs, which is indicated as being post 2050, would fail to generate the level of public transport mode share and subsequent operational revenue to allow the RTS and other public transport services to be financially sustainable.

20. In order to encourage people into modal shift from private car travel, there is a need to balance the introduction of new and more frequent existing public transport services with the build out of development, to ensure that the level of patronage can sustain and support the services provided.
21. The document cites the following initial funding sources as follows:
  - *Housing Infrastructure Fund (HIF);*
  - *Section 106 developer contributions; and*
  - *other potential funding sources including instruments to collect developer contributions similar to the Strategic Infrastructure Tariff which has been envisaged through the change to Policy SP5 in the Garden Communities Local Plan Section 1, and financing through public works loans or other vehicles.*
22. It is envisaged that overall funding would be derived from a combination of government funding towards the capital costs of delivering the public transport infrastructure associated with the RTS, together with CIL receipts and/or s106 contributions. The latter funding streams would be required in relation to the RTS operational costs, until such time as the service becomes financially viable in its own right.

#### **Q19. Is the proposed phasing of the introduction of the RTS system:**

(a). *realistic?*

23. It is important to note that “*The Garden Communities – Movement & Access Study – May 2017*” presents the following census-based (2011 Census Journey to Work data) modal split figures for the Colchester Braintree Borders Garden Community (CBBGC):
  - *Hinterland Trips (<5 miles): Active Modes 11%, Public Transport 13%, Car 75%.*
  - *Longer distance trips: Public Transport 17%, Car 83%.*

*The following ‘ambitious’ modal split figures have also been generated, based on a presumption in favour of active travel and public transport. The proposed modal split figures are presented below:*

- *Internal trips within the Garden Community: Active Modes 62%, Public Transport and Cars 38%.*
- *Hinterland trips (<5 miles): Active Modes 24%, Public Transport 38%, Car 38%.*
- *Longer distance trips: Public Transport 50%, Car 50%.*



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24. The figures presented above indicate that modal choice for internal, hinterland and longer distance trips assume a considerable mode shift from car dependency, as per the existing census-based data, to active travel and public transport modes. The ambitious assumptions indicate that the proportion of car-based trips would reduce from 75% to 38% for hinterland trips and from 75% to 50% for long-distance trips.
25. The figures assume a significant proportion of trips would be made by active travel modes and public transport modes to support such modal shifts. The same document assumes that 30% of all trips to/from and within the Garden Communities would be made by RTS.
26. The “*Vision to Plan*” document indicates that the RTS would be delivered in phases, (Routes 1 to 4), with the first section, (Tendring Colchester Borders Garden Community) proposed to be delivered by 2026, with Phase 2 by 2033. In relation to revenue forecasting, the document states, “*it should be noted that these revenue forecasts are linked to the higher investment and lower investment scenarios, and not to the phasing. Thus the journey times inherent in that phased approach to capital may result in lower demand and revenue than presented here in 2033*”
27. At present, a preferred RTS route alignment has not been determined for any of the route options. The RTS has therefore not been fully appraised in terms of engineering and land ownership constraints, nor the anticipated capital costs of construction other than generic generalised costs per kilometre of the route. There is therefore uncertainty that the RTS can be delivered within the timescales defined within the Vision to Plan document.
28. Other forms of public transport in the form of bus-based and rail based services could be used to service a proportion of the GC development coming forward, in the event that the RTS were to be delayed or downgraded in terms of service frequency and level of segregation. Land adjacent to existing public transport infrastructure and services could be released earliest in this scenario.  
  
*(b). consistent with the proposed timing of development at the garden communities?*
29. It is understood from document EB/065 (Proposed Housing Trajectories) that each of the Garden Communities would deliver up to 2,500 dwellings by 2033, a total of 7,500 dwellings (albeit this total could fall to 5,910 dwellings – with 1,350 dwellings at CBBGC and 2,060 dwellings at WoBGC – if the Proposed Amendments to Policy SP7 are accepted by the Inspector). However, by 2026 the total would be a maximum of 700 dwellings. Therefore, the introduction of the RTS is consistent with the timing of the GCs as defined within the respective documents. However, as set out above, there remains uncertainty as to whether the timescales for delivery can be met based upon the appraisal analysis undertaken to date.

**Q20. Does the Vision to Plan document provide sufficient reassurance at this strategic stage of planning that it would be feasible in physical terms to construct the proposed RTS system?**

30. The Vision to Plan document does not provide the necessary detailed analysis to provide sufficient assurance that the RTS system can be provided in physical terms. The report sets out a strategic





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overview of the anticipated form the RTS would take, how it would be phased and also provides an initial financial appraisal of the capital costs of construction, and operating and revenue costs.

31. The document provides a series of potential alternative route alignments for each of the route options. The document does not provide a detailed assessment of how a preferred route alignment could be provided and delivered from an engineering and land take constraints perspective.

**Q21. What are the implications for the GC's of the proposal not to build Route 4, linking the Colchester and West of Braintree sub-systems, until after 2033?**

32. A good quality, efficient and essentially well used public transport network needs to be well connected in order to provide a practical and feasible alternative to journeys made by private car. By failing to connect the RTS sections between Braintree and CBBGC, to which the route 4 alignment provides, the ability to travel to places of work, education and leisure by public transport services along this corridor is reduced. It is therefore essential that route 4 or an equivalent public transport connection is also delivered to deliver a comprehensive public transport network. As above, the delivery of the route 4 (or equivalent connection) would need to be introduced in tandem with the delivery of development, to ensure that appropriate CIL / s106 contributions towards the operation of the RTS service would be forthcoming.

**Q22. The Vision to Plan document proposes a bus rapid transit system initially, potentially to be replaced beyond the Section 1 Plan period by trackless trams. Are these proposals justified and consistent with the Plan's aspirations for high-quality rapid transit networks and connections?**

33. The proposals are not inconsistent with the aspirations for high-quality rapid transit networks and connections, although we refer back to the very ambitious mode share assumptions of 30% of all journeys being made by RTS that the "virtuous circle of sustainable travel" is predicated upon. The analysis does not provide a sensitivity analysis that assesses what would be operationally financially viable should less aspirational mode share targets be achieved.

#### Mode Share Strategy

**Q23. Are the refined mode share targets set out in Figures 7.1, 7.2 & 7.3 of the Mode Share Strategy document (EB/080) justified by the evidence contained and referenced in that document?**

34. The Mode Share Strategy for North Essex Garden Communities (July 2019) [EB/080] was produced by Integrated Transport Planning Ltd. The refined mode share targets are given for the following communities:

- **Figure 7.1** - Tendering Colchester Borders Garden Community (TCBGC)
- **Figure 7.2** - Colchester Braintree Border Garden Community (CBBGC)
- **Figure 7.3** - West of Braintree Garden Community (WoBGC)



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35. The Mode Share Strategy sets out how mode share will change in response to the provision of transport infrastructure, public transport services and incentives to reduce car use over the implementation period. The strategy for the three GCs is based on using initial mode share targets from the local area and over time reducing car use as Rapid Transit, cycling and walking infrastructure is delivered. This will also be achieved as the development achieves critical mass, with more local services and facilities becoming available, resulting in people having less need to travel long distances. The initial base year mode shares are derived from the Forecast Motorised Trips and Mode Share within the *Rapid Transit System for North Essex document, July 2019 (EB/079)*.
36. For the modal shift strategy to be successful, in addition to providing alternatives to the private car, RHDHV would expect it necessary to manage demand for car use within the GCs.
37. The need to manage demand is acknowledged in section 4.39 of the strategy '*Parking provision in terms of its location, quantity, cost and the way users pay for it, is a key influence on car use, and a key demand management tool available to local authorities.*' However, the strategy continues to state in 4.40 that '*Clearly, in the North Essex context, very low or car free development is unlikely to be acceptable on a large scale*'. This provides the strategy's biggest challenge as restricting car use through parking controls would be a necessary element of the strategy.
38. The development of land within close proximity to existing bus and rail station services, and improving connectivity by walking and cycling modes to these services, offers the greatest potential to replace car trips from the local highway network. Providing enhanced connectivity to Marks Tey and Colchester rail stations, for example, would also succeed in removing car based journeys from the strategic highway network.
39. The example given in the Mode Share Strategy of Freiburg in North Germany features communal multi-storey parking for residents with limited access by vehicle to individual dwellings. In order to achieve the mode shares proposed, these restrictive measures would need to be adopted in order to drive the use of active travel and public transport.
40. The document is not sufficiently far reaching in a commitment to parking restraint, reducing the need to travel and subsequently reducing the number of private car journeys likely to be made. As such, there is insufficient evidence to suggest that the ambitious public transport and active travel mode shares could be achieved.



**APPENDIX 1 – Extracts from Inspector’s Post Hearing Letter to the NEAs (IED011) 8<sup>th</sup> June 2018**

33. “... WoBGC [West of Braintree Garden Community] would be reliant on the A120 for eastward strategic road connections to Colchester and beyond, and both the A120 and A12 (which currently meet at Marks Tey) would provide essential strategic highway links for CBBGC [Colchester Braintree Borders Garden Community].

34. I understand that decisions on what is included in the RIS2 programme are due to be made in 2019. No firm view on the feasibility of either WoBGC or CBBGC can be taken until it is known whether or not the A120 dualling scheme is included in that programme (or can be otherwise fully funded). While the GCs would contribute to the cost of the scheme, I have seen no evidence that it could be fully funded if it is not included in RIS2. It may be possible to devise interim solutions to accommodate a proportion of the generated traffic, and thereby enable early phases of one or both GCs to proceed, but that would not justify an in-principle endorsement of the GC proposals as a whole.

35. Moreover, the two alternative alignments currently under consideration for the widened A12 in the Marks Tey area are not compatible with the proposed layout of CBBGC as set out in the Concept Framework. In order to avoid having an unacceptable severance effect, the improved A12 would need to take a line some distance to the south-east of those existing alternatives. The NEAs have made a bid to Government for funds to facilitate that further alternative alignment, but the outcome is not yet known.”



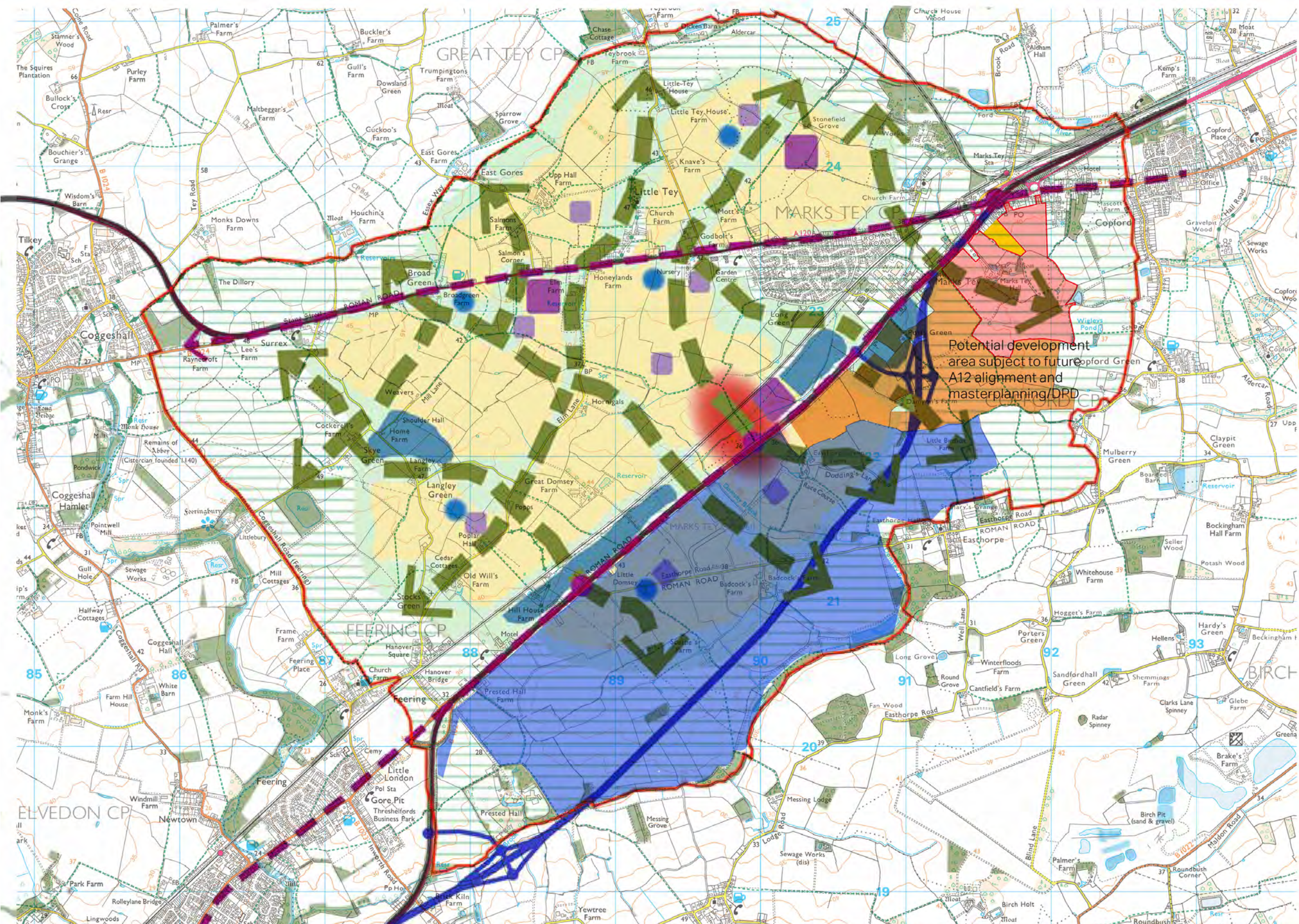
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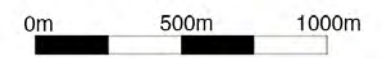
**APPENDIX 2 – Plan of Key Land Ownerships with CBBGC Indicative Masterplan Overlay (drawing no. 17012\_16a)**

**APPENDIX 3 - Consultation Response of Crest Nicholson Operations and RF West Ltd to Highways England's A12 Route Options**





- Key**
- Land under option
  - Wider West landholding
  - David Sherwood land within Broad Area of Search
  - Livelands
  - Site Boundary
  - Initial Site Area
  - Developable Area
  - Functional Open Space
  - Primary School
  - Secondary School
  - Employment
  - Town Centre
  - Local Centre
  - Green Links and Corridors
  - Primary RTS route
  - A12/A120 (existing)
  - A12/A120 (Proposed re-alignment)
  - Woodland
  - Water body



**Key Land Ownerships with Braintree Borders  
Indicative Masterplan Overlay  
Marks Tey, Essex**

Drawing	Revision	Revision detail
17012_16	a	
Drawn By	Date	Scale
CH	08/19	Linear@A3

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## Response ID ANON-XJNF-NEQ7-H

Submitted to A12 Chelmsford to A120 Widening (Junctions 23 to 25) Public Consultation October 2019

Submitted on 2019-11-29 16:24:30

### A12 Chelmsford to A120 Widening (Junctions 23 to 25) - Consultation Response Form

#### About you

**1 Please provide us with your name and address. If you'd prefer for your comments to be anonymous, please provide us with your postcode so we know where you live in relation to the scheme.**

**Name:**

Andrew Martin

**Address:**

Andrew Martin - Planning

Town Mill

Mill Lane

Stebbing

Essex

**Postcode:**

CM6 3SN

**If you would like to receive future updates about the scheme please provide your email address below:**

**Email:**

andrew@am-plan.com

**Are you responding on behalf of an organisation, business or campaign group? (If 'Yes' please provide organisation name and your role within it)**

Yes

**Organisation/business/campaign group name::**

Crest Nicholson Operations Ltd & RF West Limited

**Role::**

Planning Consultant acting on behalf of Promoters

**2 Which of the following best describes you? (Please tick all that apply)**

Local resident, Local business owner, Other (please specify in comments box below)

**Comments:**

R F West = Local business owner and residents.

Crest Nicholson = Promoters and housebuilders.

**3 Have you received correspondence informing you that you are an affected landowner?**

Yes

**4 How often do you use this section of the A12? (Please tick one option)**

Five or more days a week

**5 What time of day do you typically travel through this section of the A12? (Please tick all that apply)**

Weekday peak period (7am to 9am and 4pm to 6pm), Weekday daytime (9am to 4pm), Evenings / early morning (6pm to 7am), Weekends

#### The project

**6a Please tick one of the following statements which best represents your views on this option.**

**Option A Matrix - Option A:**

Strongly oppose

**6b Please provide any comments that you wish to add about this option:**

**Comments:**

Please refer to final section for full details. In summary:-

We strongly oppose Route A for the following reasons:

- The re-alignment of the A12 along this route, to the south east of the Marks Tey settlement, would result in the loss of a sizable amount of potential developable land. This would ultimately limit the overall capacity for housing at this sustainable location which has good existing public transport accessibility.
- The creation of such a dominant physical barrier along route A would segregate the far eastern section of the indicative 'core development area'. This does not demonstrate good strategic planning in terms of promoting community cohesion for future development. No explanation has been given for the definition of the 'core development area' in the 4 options, but it excludes the western most part of the existing Marks Tey settlement.
- It is considered that all of the potential options will have some impact on the setting of a number of heritage assets. It would have a greater overall adverse impact on the three listed buildings at Marks Tey Hall and greater harm to the setting than Options B and D. Route A would also sever the historic avenue leading to Prested Hall, a Grade II Listed Building. This avenue forms an important feature both in the local landscape and makes a valuable and positive contribution to the setting of Prested Hall.
- This route alignment is in close proximity to Junction 25 and it is considered that this may limit the extent of road user and road safety improvements, which is a key objective of the A12 widening initiative.

**7a Please tick one of the following statements which best represents your views on this option.****Option B Matrix - Option B:**

Support

**7b Please provide any comments that you wish to add about this option:****Comments:**

Please refer to final section for full details. In summary:-

We Support Route B as the second preference to Option D for the following reasons:

- Route B circumnavigates the southern edge of the indicative 'core development area', therefore provides a greater opportunity for a comprehensive development which can be seen as a whole, rather than one which is severed by a major road. That is, it provides greater flexibility and the advantage of comprehensively planning the integration of the proposed Garden Community with the existing Marks Tey community and the opportunity for creating a high quality public realm and sustainable place.
- It is considered that all of the potential options will have some impact on the setting of a number of heritage assets, however Route B would have less impact on the setting of the three listed buildings at Marks Tey Hall than Options A and C. Also it would integrate these buildings into the Marks Tey community as part of an overall comprehensive masterplan, compared with their current isolation and separation by the existing A12. Route B would sever the historic avenue leading to Prested Hall, a Grade II Listed Building. This avenue forms an important feature both in the local landscape and makes a valuable contribution to the setting of Prested Hall.
- Route B provides an opportunity to address the fundamental issues that are created by the existing junction 25 in terms of severance for walkers horse riders, cyclists and public transport.
- Route B provides opportunity to make use of a historic landfill site land which otherwise would not be available for other uses. It is understood that the fill material was inert and related to surplus material generated from the original A12 construction works. Therefore it is unlikely that there would be any risks of contamination but any such risks that may be discovered should be capable of being mitigated through capping or other appropriate measures.
- Route B ensures that Copford retains its physical separation from Marks Tey but creates substantial benefits to Marks Tey by moving the current A12, which at present forms a major physical and psychological barrier and division of the existing community. This option also provides the opportunity to improve access and connectivity to Marks Tey station and multi-modal transport hub.

**8a Please tick one of the following statements which best represents your views on this option.****Option C Matrix - Option C:**

Strongly oppose

**8b Please provide any comments that you wish to add about this option:****Comments:**

Please refer to final section for full details. In summary:-

We strongly oppose Route C for the following reasons:

- The re-alignment of the A12 along route C, to the south east of the Marks Tey settlement, would result in the loss of a sizable amount of potential developable land. This would ultimately limit the overall capacity for housing at this sustainable location which has good existing public transport accessibility.
- The creation of such a dominant physical barrier along route C would segregate the far eastern section of the indicative 'core development area'. This does not

demonstrate good strategic planning in terms of promoting community cohesion for future development.

- This route alignment is in close proximity to Junction 25 and it is considered that this may limit the extent of road user and road safety improvements, which is a key objective of the A12 widening initiative.
- Route C, as with Route A would have a greater overall adverse impact on the three listed buildings at Marks Tey Hall and would cause greater harm to their setting than Options B and D.

**9a Please tick one of the following statements which best represents your views on this option.**

**Option D Matrix - Option D:**

Strongly support

**9b Please provide any comments that you wish to add about this option:**

**Comments:**

Please refer to final section for full details. In summary:-

We strongly support Route D as the preferred and most beneficial option for the following reasons:

- The route option D circumnavigates the southern edge of the indicative 'core development area', therefore this route provides a greater opportunity to plan for a comprehensive development which can be seen as a whole, rather than one which is severed by a major road. It provides greater flexibility for masterplanning and has the advantage of allowing the comprehensive planning and integration of the proposed Garden Community with the existing Marks Tey community and opportunity to create a high quality public realm and sustainable place.
- Route D provides an opportunity to address the fundamental issues that are created by the existing junction 25 in terms of severance for walkers horse riders, cyclists and public transport.
- Route D has less impact on the setting of the three listed buildings at Marks Tey Hall than Options A and C. Also it would integrate these buildings into the Marks Tey community as part of an overall comprehensive masterplan, compared with their current isolation and separation by the existing A12.
- Route D provides opportunity to make use of historic landfill site land which otherwise would not be available for other uses. It is understood that the fill material was inert and related to surplus material generated from the original A12 construction works. Therefore it is unlikely that there would be any risks of contamination but any such risks that may be discovered should be capable of being mitigated through capping or other appropriate measures.
- Route D ensures that Copford retains its physical separation from Marks Tey but creates substantial benefits to Marks Tey by moving the current A12, which forms a major physical and psychological barrier and division of the existing community. This option also provides the opportunity to improve access and connectivity to Marks Tey station and multi-modal transport hub.
- Route D will provide the most traffic volume relief on local roads.

**The consultation**

**10 How did you find out about the consultation? (Please tick all that apply)**

Your local council, Highways England website or Twitter account

**Comments:**

**Please provide us with any comments you may have on the consultation process. Your feedback will help us improve how we engage with you in the future.**

**Comments:**

No explanation has been given for the definition of the 'core development area' shown on the 4 option images, but it excluded the western most part of the existing Marks Tey settlement.

Please refer to documents emailed to info@highwaysengland.co.uk, namely:-

1. PB8028-RHD-ZZ-XX-NT-Z-0003 - 29-11-2019 -A12 Options.pdf
2. Crest Nicholson Operations Ltd and RF West Ltd Consultation Response.
3. Figure 1
4. Figure 2



## REVIEW OF TECHNICAL DATA/RESEARCH AND SUPPORTING INFORMATION

Royal HaskoningDHV has undertaken an initial review of the technical data/ research and supporting information relating to the current Highways England Public Consultation on the four route options for the A12 to A120 Widening between Junctions 23 and 25.

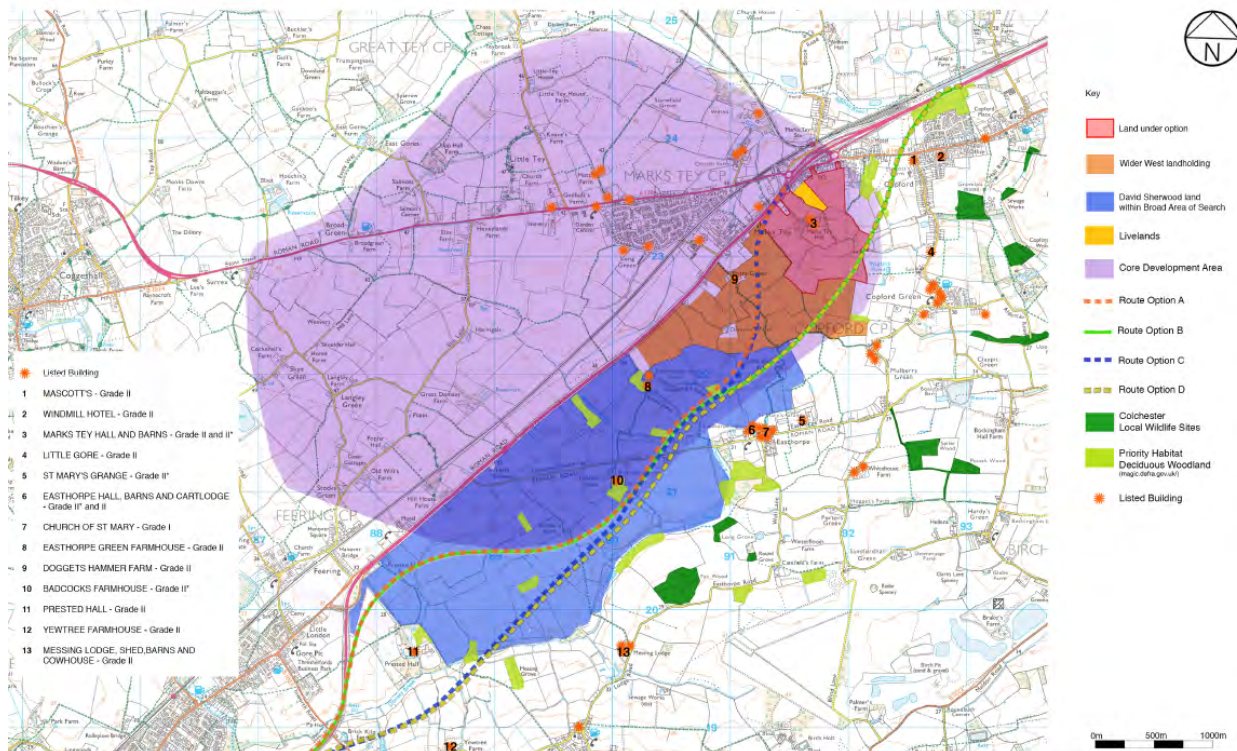
A copy of the response to this consultation on behalf of Crest Nicholson Operations Ltd and RF West Ltd has been emailed to [info@highwaysengland.co.uk](mailto:info@highwaysengland.co.uk) together with A3 copies of figures 1 and 2 referred to below.

### A12 Consultation Options

Highways England has presented four potential alignment options between Junction 23 and 25 for consideration, however these comments relating to Marks Tey effectively result in two options. In terms of the impact on Marks Tey, Options A and C would continue to use the existing A12 alignment through Marks Tey retaining/exacerbating severance between the eastern part of the village and the railway station to the west. Options B and D realign the A12 to east of the village and provide an opportunity for the village to establish a new centre around the railway station.

A summary of the four options in the context of the wider area is shown on **Figure 1**.

**Figure 1: A12 Junction 23 to 25 Route Options**



## Comparison of Environmental Factors

Highways England has provided a comparison of the environmental factors affecting each of the four options. The anticipated environmental factors are presented within the Highways England A12 Chelmsford to A120 widening Junction 23 to Junction 25 Public Consultation document which are summarised in **Table 1**.

**Table 1 – Comparison of Environmental Factors (Highways England A12 Chelmsford to A120 widening Junction 23 to Junction 25 Public Consultation)**

Environmental Factor	Option A and C A12 widened online through Marks Tey	Option B and D A12 diverted to east of Marks Tey	RHDHV Review
Air Quality	Congestion may reduce but volume of traffic could increase.		Agree
	The alignment of the A12 through Marks Tey is close to residential areas that are more sensitive to air pollution.	The diverted A12 is further away from sensitive receptors.	Agree
	Air quality is likely to worsen surrounding the new A12 due to additional traffic		Partially Agree. Free flowing traffic may actually reduce some particulate emissions.
Cultural Heritage	The increased footprint of the A12 could impact on archaeological assets.		Agree. Mitigation to minimise potential impact would need to be investigated.
		Access to Marks Tey Hall would be improved.	Agree
Landscape	More visual impact on the Marks Tey Hall.	More visual impact on the area between Marks Tey and Copford.	Disagree. The visual impact could be mitigated by lowering the road alignment and providing a bund.
Ecology and nature conservation		Potential impact of deciduous woods between Marks Tey and Copford	Disagree. Please refer to Figure 2 which demonstrates how any potential impact could be greatly mitigated as a result of an alternative amended alignment option.
Geology and soils	Limited to land within / next to highway boundary	Requires more land and may result in additional loss and severance to agricultural land.	Partially Agree. It should be noted that all options (A to D) will result in additional loss/severance to agricultural land along any proposed J23 to J25 alignment.
Noise and Vibration	Better surfacing will result in reduced noise		Agree
	Improved capacity may encourage more journeys and increased vehicles speed could have a negative noise impact on properties alongside the A12.	Potential noise impact of new bypass on properties in Copford	Disagree. Technical mitigation solutions could be implemented to suppress noise impacts. Creation of bunds/acoustic barriers would serve to mitigate impact.
	Traffic noise in Marks Tey more difficult to mitigate	Noise fencing or other measure would mitigate where appropriate.	Agree
Rights of Way	Highways England have assumed that all Public Rights of Way could be accommodated. Widening the A12 could remove existing pedestrian footpath. Alternative facilities would be investigated.		Agree

	Existing walking routes alongside and crossing the A12 would still be affected by severance	If existing rights of way are removed, new routes/ crossings would be provided.	Agree
Water environment	The current A12 crosses several watercourses and drainage features. Widening would require improvements to crossings and drainage.	Increased footprint at bypasses could result in significant impacts.	Partially agree. Any proposed A12 alignment would result in an increased footprint. However, the impacts could be mitigated following a full SUDS and drainage analysis appraisal.
People and community	Residential properties along the A12 could experience negative effects with worsening view, increased noise and direct access removal. Upgraded A12 closer to properties and business.	Impacts could be reduced through mitigations such as landscaping, alternative access and noise mitigation.	Agree
	On-line widening at Marks Tey likely to have significant impact during the construction stage due to noise, vibration and traffic congestion/ temporary traffic management	Reduction in passing trade possible as traffic moves onto the A12.	Disagree. Any loss of passing trade associated with the A12 alignment could be offset by the potential for new communities to the south of Marks Tey. The new communities would not be severed from the existing Marks Tey settlement and rail station. A revitalised and expanded Marks Tey centre could enhance trading conditions in providing a more pleasant environment for people to shop.
	Properties adjacent to on-line widening will be negatively impacted. Impacts reduced through planning schemes, noise mitigation and provision of alternative access.	Direct access on current A12 could improve where traffic moves onto new A12.	Agree
		Properties on current A12 could see reduced noise and improved air quality due to traffic moving onto bypasses.	Agree
	Requires the acquisition of the most properties.	Requires acquisition of the least properties.	Agree

### SWOT (Strengths Weaknesses Opportunities Threats) Analysis

To determine the comparative suitability of each of the two sets of options, a SWOT analysis has been undertaken. The SWOT analysis helps to inform the key benefits and dis-benefits of each proposal to be considered and allows a qualitative assessment of the options. It should be noted that detailed costing for the proposed schemes has not been undertaken by Highways England and as such a qualitative assessment of perceived costs only has been undertaken.

The SWOT analysis of each of the four options are presented within **Tables 2 and 3**.

**Table 2: Option A and C – A12 at Marks Tey Following Existing Alignment SWOT Analysis**

<p><b>Strengths</b></p> <ul style="list-style-type: none"> <li>• Reduced impact and land take on green fields east of Marks Tey.</li> <li>• Continuing to use the existing A12 could reduce build costs. This may however be dependent on the associated costs of traffic management, delays and congestion related to widening online.</li> <li>• Minimises the number of new receptors impacted by the A12.</li> </ul>	<p><b>Weaknesses</b></p> <ul style="list-style-type: none"> <li>• Potentially increase severance, noise, and reduce air quality and overall amenity to residents of Marks Tey due to additional A12 traffic.</li> <li>• Continued environmental impact on residential properties along London Road.</li> <li>• The existing A12 cannot be reused for local traffic, active travel or public transport improvements.</li> <li>• Greater disruption to existing residents during construction.</li> <li>• The alignment could have a greater impact on Marks Tey Hall.</li> <li>• The alignment reduces the land available for the development of the Garden Community to the south of the existing A12 within Marks Tey</li> <li>• The Core Development Area as identified within the HE Consultation Brochure, excludes the development site which is the most closely connected, sustainable and would afford the best integration to the existing settlement.</li> <li>• Option A is particularly sinuous in the form of alignment which could have increased construction costs.</li> </ul>
<p><b>Opportunities</b></p> <ul style="list-style-type: none"> <li>• The relocated Junction 25 to the south of Marks Tey makes passive provision for potential future connections to the Garden Community.</li> </ul>	<p><b>Threats</b></p> <ul style="list-style-type: none"> <li>• Additional traffic growth on the A12 would increase environmental impact on adjacent residential properties on London Road.</li> </ul>

**Table 3: Option B and D – A12 at Marks Tey Following New Alignment to South East of Marks Tey**

<p><b>Strengths</b></p> <ul style="list-style-type: none"> <li>• The new alignment would enable the existing issue of severance in Marks Tey to be addressed.</li> <li>• Creates developable sites in the centre of Mark Tey, in the most sustainable location, in closest proximity to the station</li> <li>• Reduced impact on existing residents of Mark Tey</li> <li>• The widening of the A12 would be easier to build off-line and have less impact during the construction stage.</li> <li>• Option D is the most direct in the form of alignment which could have reduced construction cost implications.</li> </ul>	<p><b>Weaknesses</b></p> <ul style="list-style-type: none"> <li>• Indicative siting of Junction 25 may not be optimally located to serve the proposed Garden Community. This can be mitigated as per the RHDHV Alternative A12 Alignment in Figure 2 (below).</li> <li>• The new alignment would require increased land take between Marks Tey and Copford.</li> <li>• The impact of the A12 alignment could increase the sensitivity to environmental receptors in the vicinity of Copford, requiring mitigation measures to be implemented.</li> </ul>
<p><b>Opportunities</b></p> <ul style="list-style-type: none"> <li>• The existing alignment of the A12 could be reused to provide walking and cycling routes, public transport corridor and local access.</li> <li>• Improved access to Marks Tey railway station.</li> </ul>	<p><b>Threats</b></p> <ul style="list-style-type: none"> <li>• Will require additional land acquisition.</li> </ul>

- Potential for higher density development around the railway station
- Potential for new local centre around the railway station.
- Would enable development opportunities which are more sustainably located and in closer proximity to the existing Marks Tey settlement and rail station.
- Can be built with minimum disruption to the A12.

Having reviewed the SWOT analysis of Options A and C and Options B and D, RHDHV's conclusion is that Options B and D provide the most appropriate alignment for the A12 in the vicinity of Marks Tey. The findings are based on the following:

- Overcoming the existing severance of Marks Tey caused by the existing A12.
- Providing opportunities for the reuse of the existing A12 to create new transport corridors.
- Substantial opportunity to create a new centre to Marks Tey around the railway station.
- Enabling development opportunities which are more sustainably located and in closer proximity to the existing Marks Tey settlement and rail station.
- Reduced environmental impact upon the residents of Marks Tey living within proximity of the existing A12 alignment.
- In terms of buildability, options B/D would be easier, cost effective in terms of construction and less disruptive to the community and the travelling public than options A/C.

Two issues were flagged through the assessment that could be addressed by some changes to Options B and D. These were:

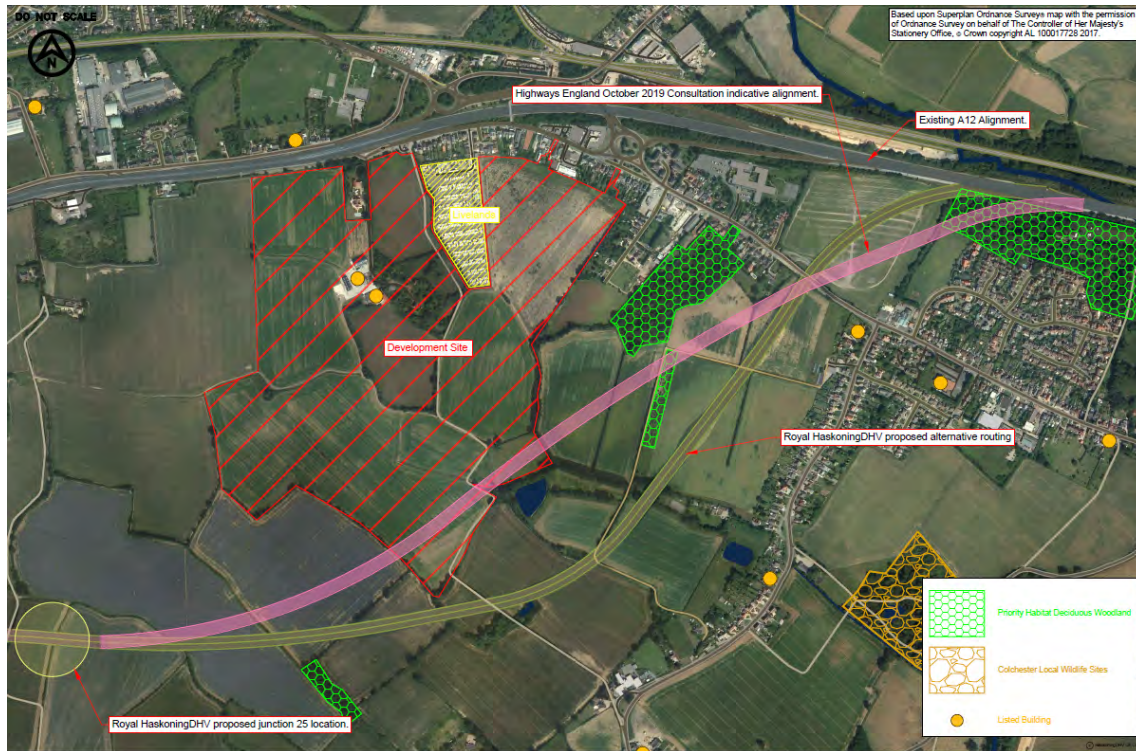
- Impact of the proposed A12 alignment on deciduous woodland between Marks Tey and Copford.
- The location of the proposed new Junction 25 to the east of Marks Tey in relation to access to the proposed Garden Community. In either of the A12 alignment options, a new junction to the south of Marks Tey would be preferable. This would provide better opportunities to link to the Garden Communities via a new crossing of the railway line.

### **Alternative Alignment for Option B and D to Reduce Environmental Impact**

A proposed re-alignment of Options B and D has been prepared based on appropriate design standards from the Design Manual for Road And Bridges (DMRB). As can be seen, the alignment proposed has a reduced the impact of the proposed road on the deciduous woodland. The location of the proposed Junction 25 has been relocated to the south of Marks Tey. This location would be more appropriate for an access road to the Garden Community to join the new A12. A junction at this location could also provide a convenient link for local access along the redundant A12 alignment. The proposed alignment of Options B and D are shown in **Figure 2**.



**Figure 2: Alternative Alignment for Option B and D**



The adoption of Options B and D would enable the current alignment of the A12 to be re-purposed as a new centre for Marks Tey. This would be an appropriate location of village and town centre uses in close proximity to the railway station. Part of the former A12 would be retained for walking and cycling routes, a public transport corridor and local access. A proposal of this type would be consistent with proposals for the future Garden Community and other residential development sites.

## Conclusion

A review of the A12 alignment options A, B, C and D presented by the HE as part of its consultation on route options for the A12 to A120 Widening between Junctions 23 and 25 has been undertaken.

RHDHV's initial findings indicates that options A and C would lead to more detrimental impact for the following reasons:

- Potentially increases severance, noise, and reduce air quality and overall amenity to residents of Marks Tey due to additional A12 traffic.
- Continued environmental impact on residential properties along London Road.
- Prevents the existing A12 corridor from being repurposed for local traffic, active travel or public transport improvements.
- Lead to greater disruption to existing residents during construction.
- The alignment reduces the land available for the development of the Garden Community to the south of the existing A12 within Marks Tey.
- The alignment could have a greater impact on Marks Tey Hall.
- The Core Development Area as identified within the HE Consultation Brochure, excludes the site which is the most closely connected and would afford the best integration to the existing settlement.

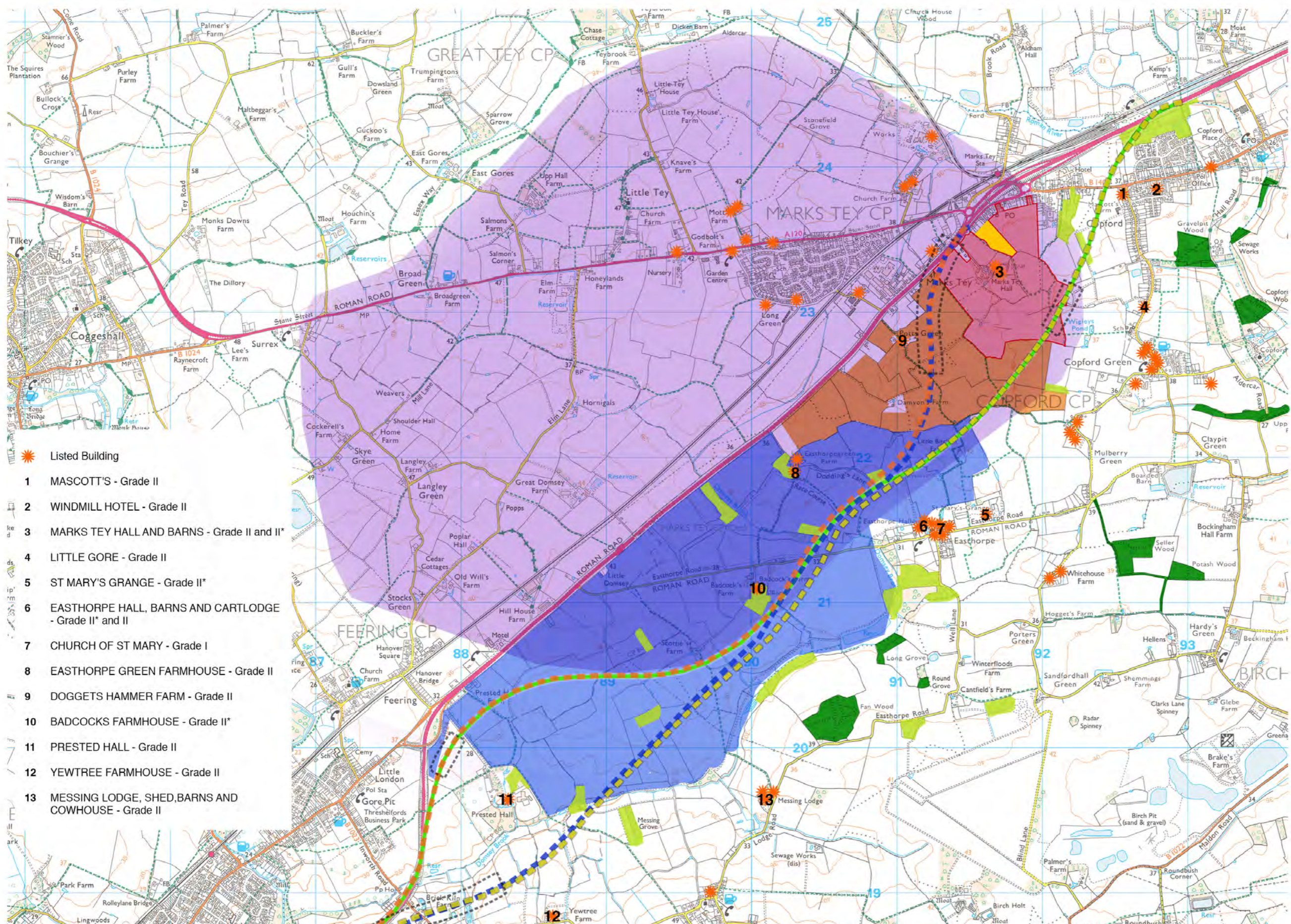
- Option A is particularly sinuous in the form of alignment which could have increased construction costs.

RHDHV consider that routes B and D offer greater benefits and reduced environmental impacts for the following reasons:

- The new alignment would enable the existing issue of severance caused by the existing A12 in Marks Tey to be addressed.
- Would create more sustainable development sites in the centre of Mark Tey, and allow the reuse of the existing A12 to create new transport corridors.
- Create the potential for a new community hub providing additional local facilities and services to support and complement new residential development in Marks Tey around the railway station.
- The widening of the A12 would be easier to build off-line and have less impact during the construction stage. In terms of buildability, options B/D would be easier, cost effective in terms of construction and less disruptive to the community and the travelling public than options A/C.

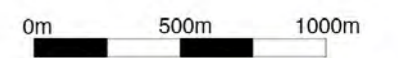
RHDHV conclude that options B/D with suggested alterations would provide the optimal solution.





- Key**
- Land under option
  - Wider West landholding
  - David Sherwood land within Broad Area of Search
  - Livelands
  - Core Development Area
  - Route Option A
  - Route Option B
  - Route Option C
  - Route Option D
  - Colchester Local Wildlife Sites
  - Priority Habitat Deciduous Woodland (magic.defra.gov.uk)
  - Listed Building
  - New Junction would be located in this area

- Listed Building
- 1 MASCOTT'S - Grade II
- 2 WINDMILL HOTEL - Grade II
- 3 MARKS TEY HALL AND BARNS - Grade II and II\*
- 4 LITTLE GORE - Grade II
- 5 ST MARY'S GRANGE - Grade II\*
- 6 EASTHORPE HALL, BARNS AND CARTLODGE - Grade II\* and II
- 7 CHURCH OF ST MARY - Grade I
- 8 EASTHORPE GREEN FARMHOUSE - Grade II
- 9 DOGGETS HAMMER FARM - Grade II
- 10 BADCOCKS FARMHOUSE - Grade II\*
- 11 PRESTED HALL - Grade II
- 12 YEWTREE FARMHOUSE - Grade II
- 13 MESSING LODGE, SHED, BARNS AND COWHOUSE - Grade II



Proposed A12 Re-alignment Options and Existing Local Assets Marks Tey, Essex		
Drawing 17012_18	Revision a	Revision detail
Drawn By CH	Date 11/19	Scale Linear@A3

  
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DO NOT SCALE



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Highways England October 2019 Consultation indicative alignment.

Existing A12 Alignment.

Royal HaskoningDHV proposed alternative routing

Royal HaskoningDHV proposed junction 25 location.

 Priority Habitat  
Deciduous Woodland

 Colchester Local  
Wildlife Sites

 Listed Building

TITLE ROYAL HASKONINGDHV  
PROPOSED ALTERNATIVE A12  
J23-25 ALIGNMENT

PROJECT LAND AT MARKS TEY, ESSEX



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STATUS	S3	DATE	29.11.19	SCALE	N.T.S
DRAWN	JW	CHECKED	CS	PASSED	CS
DRG No.	PB8028-SK19			REV	P2

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