

# LOCAL PLAN SUB-COMMITTEE AGENDA

Thursday 24th November 2022 at 6.00pm

Council Chamber, Braintree District Council, Causeway House, Bocking  
End, Braintree, CM7 9HB

**THIS MEETING IS OPEN TO THE PUBLIC**

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Members of the Local Plan Sub-Committee are requested to attend this meeting to  
transact the business set out in the Agenda.

**Membership:-**

Councillor J Abbott

Councillor K Bowers

Councillor G Butland

Councillor J Coleridge

Councillor T Cunningham

Councillor T Everard

Councillor D Hume

Councillor Mrs I Parker

Councillor Mrs W Scattergood (Vice Chairman)

Councillor Mrs G Spray (Chairman)

Councillor P Thorogood

Councillor J Wrench

Apologies: Members unable to attend the meeting are requested to forward their  
apologies for absence to the Governance and Members Team on 01376  
552525 or email [governance@braintree.gov.uk](mailto:governance@braintree.gov.uk) by 3pm on the day of the  
meeting.

D GASCOYNE  
Chief Executive

## **INFORMATION FOR MEMBERS - DECLARATIONS OF INTERESTS**

### **Declarations of Disclosable Pecuniary Interest (DPI), Other Pecuniary Interest (OPI) or Non- Pecuniary Interest (NPI)**

Any member with a DPI, OPI or NPI must declare the nature of their interest in accordance with the Code of Conduct. Members must not participate in any discussion of the matter in which they have declared a DPI or OPI or participate in any vote, or further vote, taken on the matter at the meeting. In addition, the Member must withdraw from the Chamber where the meeting considering the business is being held unless the Member has received a dispensation from the Monitoring Officer.

**Public Question Time – Registration to Speak on an Agenda Item:** The Agenda allows for a period of up to 30 minutes for Public Question Time. Members of the public wishing to speak are requested to register by contacting the Governance and Members Team on 01376 552525 or email [governance@braintree.gov.uk](mailto:governance@braintree.gov.uk) by midday on the second working day before the day of the Sub-Committee meeting.

For example, if the Sub-Committee meeting is on a Tuesday, the registration deadline is midday on Friday, (where there is a Bank Holiday Monday you will need to register by midday on the previous Thursday). The Council reserves the right to decline any requests to register to speak if they are received after this time.

All registered speakers will have three minutes each to make a statement.

**Public Attendance at Meeting:** The Council has reviewed its arrangements for this decision making meeting of the Local Plan Sub-Committee in light of the Covid pandemic. In order to protect the safety of people attending the meeting, Councillors and Officers will be in attendance at Causeway House, Bocking End, Braintree. Members of the public may also attend the meeting 'in person', but priority will be given to those people who have registered to speak during Question Time. Members of the public will be able to view and listen to the meeting via the Council's YouTube Channel at <http://www.braintree.gov.uk/youtube>

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**Comments and Suggestions:** We welcome comments to make our services as efficient and effective as possible. If you have any suggestions regarding the meeting you have attended you can send these to [governance@braintree.gov.uk](mailto:governance@braintree.gov.uk)

- 1 Apologies for Absence**
- 2 Declarations of Interest**  
To declare the existence and nature of any Disclosable Pecuniary Interest, other Pecuniary Interest, or Non-Pecuniary Interest relating to Items on the Agenda having regard to the Code of Conduct for Members and having taken appropriate advice where necessary before the meeting.
- 3 Minutes of the Previous Meeting**  
To approve as a correct record the Minutes of the meeting of the Local Plan Sub-Committee held on 5th July 2022 (copy previously circulated).
- 4 Public Question Time**  
(See paragraph above)
- 5 A12 to A120 Widening Scheme - Statement of Common Ground** **5 - 74**
- 6 Local Development Scheme - Revision** **75 - 95**
- 7 Urgent Business - Public Session**  
To consider any matter which, in the opinion of the Chairman, should be considered in public by reason of special circumstances (to be specified) as a matter of urgency.

**Exclusion of the Public and Press**

To agree the exclusion of the public and press for the consideration of any Items for the reasons set out in Part 1 of Schedule 12(A) of the Local Government Act 1972.

*At the time of compiling this Agenda there were none.*

**PRIVATE SESSION**

- 8 Urgent Business - Private Session**  
To consider any matter which, in the opinion of the Chairman, should be considered in private by reason of special circumstances (to be specified) as a matter of urgency.

<b>Report Title: A12 to A120 Widening Scheme SOCG</b>	
<b>Report to: Local Plan Sub-Committee</b>	
<b>Date: 24th November 2022</b>	<b>For: Decision</b>
<b>Key Decision: Yes</b>	<b>Decision Planner Ref No:</b>
<b>Report Presented by: Gary Sung, Senior Planning Policy Officer</b>	
<b>Enquiries to: <a href="mailto:gary.sung@braintree.gov.uk">gary.sung@braintree.gov.uk</a>; 2525</b>	

## **1. Purpose of the Report**

- 1.1 To update the Local Plan Sub-Committee on the A12 Chelmsford to A120 Widening Scheme SOCG between Braintree District Council (the Council) and National Highways.

## **2. Recommendations**

- 2.1 To note that the issues in Green within the Statement of Common Ground are resolved as agreed with National Highways.
- 2.2 To note that the issues in Amber and Red which are currently unresolved.
- 2.3 To note the Cabinet Member for Planning and Infrastructure, in consultation with the Head of Planning and Economic Growth, will agree the final Statement of Common Ground.

## **3. Summary of Issues**

- 3.1 The A12 Chelmsford to A120 Widening Scheme (the Project) is a £1bn to £1.2bn road investment by National Highways for the entire length of the A12 within the district. It is scheduled to be completed by 2027 after a 4 year construction period. As a Nationally Significant Infrastructure Project (NSIP), it will be permitted following approval of a Development Consent Order (DCO) by the relevant Secretary of State after having had consideration of the recommendations from the Planning Inspectorate led examination. The Council is one of several discharging authorities who will then have responsibility to ensure that construction and operation of this project is sufficiently controlled and mitigated. This includes discharging detailed consents post examination and negotiating S.106 agreements during examination.
- 3.2 The Statement of Common Ground (or uncommon ground) (SoCG) sets out the issues of agreement between National Highways and the Council only. Essex County Council (ECC) and other Local Authorities will compose their own SoCGs with National Highways individually instead of pursuing a joint SoCG. Officers from Local Authorities affected by the Project are in

communication with each other and hold regular meetings so that local authorities positions on the key issues within the SoCGs should remain in harmony.

- 3.3 The SoCG at Appendix 1 is coded below using a RAG style to help focus on issues of uncommon ground where Red is an issue of disagreement, Amber is an issue where further negotiation is required and Green is an issue that is resolved.

3.4 Summary of issues in SoCG and RAG status

BDC summary of issue	RAG score
Population – NH under projecting growth for the district. NH corrected sensitivity to 'High'.	G
Landscaping – the Council and Witham Town Council to decide if replacement land (South of Gershwin Boulevard) will be managed directly or if a commuted sum is preferable.	A
Noise – Effective performance of noise reducing road surfacing instead of noise barriers. the Council to confirm the assessment in the EIR.	A
Human Health – Witham scores poorly compared to other settlements. NH and the Council agree that Witham Designated Funds could be applied for in this area.	G
Air Quality - The Council have requested Air Quality monitoring is carried out during operation at Hatfield Peverel.	A
Human Health – Inclusion of Nounsley Hamlet. NH confirm that the village has been considered in the wider context.	G
Human Health – Severance (whole route). NH and ECC are taking the lead on this issue.	G
Contaminated Land – NH have confirmed that they are consulting with the Environment Agency.	G
Construction compounds – These will now be subject of planning applications submitted to BDC.	G
Traffic (population baseline) - NH under projecting growth for the district. NH corrected sensitivity to 'High'.	G
Traffic (Hatfield Peverel) – agreed to be deferred to ECC	A
Traffic (Maldon Road) – agreed to be deferred to ECC	A
Local Plans - NH under projecting growth for the district. NH corrected sensitivity to 'High'.	G
Local Plans – Longlist/Shortlist of development sites. The Council to confirm the assessment in the EIR.	A
Detrunking – agreed to be deferred to ECC, collaborative dialogue being undertaken between stakeholders.	R
Totals	R=1, A=6, G=8

- 3.5 An SoCG is a live document so these issues will be updated during the course of the examination of the DCO. The SOCG is also likely to be updated to reflect the Council's Local Impact Report, through collaboration between local authorities and if new examination documents are produced. At later stages in the examination, National Highways and local authorities could pursue Principal Areas of Disagreement Summary Statements to make issues crystal clear for Inspectors.
- 3.6 Members are invited to comment on the issues within the SoCG, raise any issues concerning the A12 to A120 widening scheme to be added and note that future issues could be added. The Cabinet Member for Planning and Infrastructure, in consultation with the Head of Planning and Economic Growth will finalise the SOCG and submit.
- 3.7 The recommendations set out in this report will help the Council to deliver the following Corporate Objectives:
- A sustainable environment and a great place to live, work and play;
  - A well connected and growing district with high quality homes and infrastructure;
  - A prosperous district that attracts business growth and provides high quality employment opportunities; and
  - Residents live well in healthy and resilient communities where residents feel supported.
- 3.8 Meanwhile National Highways stated objectives for the project are:
- improve safety for road users, especially at the junctions and slip roads through better design while also removing the current direct private accesses onto the A12
  - reduce traffic congestion by increasing the capacity of the road, making journey times more reliable. The proposed scheme will save motorists as much as 1.5 hours in a working week if they travel daily between junctions 19 and 25
  - take long-distance traffic off the local roads and put it back onto the A12 where it belongs, so that local roads aren't used as rat runs, affecting local villages and their communities
  - ensure that the road can cope with the predicted increase in traffic from more jobs and homes in the area
  - make improvements for walkers, cyclists, horse riders and public transport users, to give them better connections and safer, more enjoyable journeys
- 3.9 Many of National Highway's objectives and the Council corporate objectives correlate. In addition, Local Plan vision and objectives, particularly in the capacity of supporting the economy, delivering infrastructure and delivering new homes have similar targets. Mitigation measures such as biodiversity net gain are also embedded into the project.



- 3.10 Designated funds provide an opportunity to bid for additional money for local schemes. The national value of designated funds is £1bn which is available for local initiatives such as planting and cycling schemes to support the project.

#### **4. Description of the project**

- 4.1 The A12 to A120 scheme will widen the existing A12 between junctions 19 and 25 to three lanes in each direction and create a three lane bypass in each direction at Rivenhall End and a bypass between junctions 24 (Feering) and 25 (A120 Marks Tey interchange).

##### **Progress of project development so far**

- 4.2 A reminder of the project's history from pre-application consultation to pre-examination is given below to assist in understanding the issues that are subject of the SoCG.
- 4.3 National Highways have undertaken two-periods of non-statutory consultation on the project. Both of these were reported to Local Plan Sub-Committee and the Councils written responses were approved.
- January to March 2017 – seeking opinion on three route options
  - October to December 2019 – seeking opinion on new junctions and route-options to accommodate a potential garden community at Braintree-Colchester borders.
- 4.4 The Council were also consulted on the draft version of the Statement of Community Consultation – here the Council expressed a preference for in-person events as well as online and proactive and inclusive communication. This response was approved under delegated powers.
- 4.5 A preferred route was announced in May 2020 with a statutory public consultation taking place between June and August 2021 on the preliminary design and the Preliminary Environmental Impact Assessment Report (PIERS). The Council responded to this through delegated authority and the letter is attached as appendix 2.
- 4.6 The scheme at this stage had undertaken changes to combine junction 21a/b at Hatfield Peverel with junction 21 Witham, change the location and the layout at junction 22 (Witham north), where the proposed route was moved back on to the existing A12 to avoid the Rivenhall Long Mortuary Enclosure scheduled monument. At Rivenhall End, there were revisions to the location of the bypass to avoid the River Blackwater floodplain and wholesale revisions to the location of junction 24 to reduce impacts on the grade II listed Prested Hall. Space for the A120 to connect at Kelvedon has been designed in to allow for later delivery.
- 4.7 There was also a supplementary design consultation in 2021 containing design changes affecting Hatfield Peverel and Witham South. In Hatfield Peverel, improved road surfacing will be used instead of a physical noise



barrier and the link road to J21 was switched from the south to the north, alleviating adverse noise and vibration impacts for some residents. In Witham, it became necessary to carry out the temporary removal of the Market Lane noise barrier during construction phase and the Cadent Gas main re-routing was proposed, including options appraisal of the routes. Other changes were in relation to the section of Inworth Road within Colchester Borough Council. This response is attached as Appendix 3.

- 4.8 National Highways submitted the A12 Chelmsford to A120 Widening Scheme to the Planning Inspectorate for their consideration as a Development Consent Order on the 15th August 2022. Following a 28-day Adequacy of Consultation process, the Planning Inspectorate accepted the application for DCO. The Council's response to this stage was approved under delegated authority and is attached at Appendix 4.

#### **Description of the submitted project as at pre-examination**

- 4.9 The key points on the final route, going from West (J19 Boreham Interchange for Chelmsford) to East (J27 Marks Tey) to note are:

##### **Hatfield Peverel:**

- Split Junction 20a and 20b to be removed and replaced with a new all-directions junction 21 between Hatfield Peverel and Witham above existing A12. This would be moderate change to existing and have adverse landscape impact on this location. (Adverse impact subject to SoCG).
- Access J21 via replacement Wellington Bridge.
- Use of noise reducing surfacing on southbound carriageway (Performance is an issue subject to SoCG).
- Retaining walls will be used instead of earthworks for 600 to 975m to accommodate widening.
- No material changes to Duke of Wellington Roundabout.
- In addition to the above, ECC and the Council will seek for Junction 21 to be modified to accommodate future B1019 Maldon Road link (As agreed within SoCG) (see also appendix 5).
- Retention and extension of 3m Cycleway/footpath adjacent to the northbound carriageway.
- Demolition of a barn north-east of Hatfield Peverel and Burghey Brook Cottages.

During the construction phase:

- A main construction compound to the north of Junction 21 for the whole duration of the construction phase. A planning application will be submitted to BDC in advance of the DCO examination and therefore the Council will be able to control environmental impact through development management.
- Construction compound would also be base for construction workforce and creation of new jobs.

- Removal and replacement of Bury Lane, Station Road and Wellington bridges will require mitigation measures for moderate severance to residents of Hatfield Peverel.

### **Witham South**

- New open space or commuted sum provided as mitigation for loss of designated amenity green space south of Gershwin Boulevard. (subject to agreement in SoCG).
- New walking, cycling and horseriding(WCH) bridge between Gershwin Boulevard and Olivers Drive/Howbridge Hall Road (access to new open spaces) restoring severance of footpath 121\_95.
- Demolition of Woodend Bridge, Latneys to be access via new local access road.
- Installation of 800m of retaining wall instead of earth bunds.
- Demolition of outbuildings on Maldon Road (associated with Rowanbank and Segenhoe)
- Installation of Cadent Gas Mains diversion which is also significant enough to be an NSIP

During the construction phase:

- A traffic management and logistics compound off Gershwin Boulevard.
- Temporary diversion of footpaths 121\_95, 121\_103 and 105\_36.
- Temporary removal of noise barrier at Market Lane to allow construction of retaining walls.
- Temporary diversion of footpaths 121\_101, preventing access to Whetmead Nature Reserve except by long diversion, for a period of 17 months.

### **Witham North**

- New all-directions junction 22 constructed above the new A12 alignment through Coleman's Quarry.
- New WCH bridge between Colchester Road and Little Braxted Lane.
- Improvements to the existing cycle route along the north of the current A12.
- Junction improvements with the four-way signalisation to be retained.

During the construction phase:

- A main construction compound for part of the duration of construction.

### **Rivenhall End**

- Detrunked A12 is not agreed and will be subject to SoCG for both the Council and ECC. (see also Appendix 5)

- A new roundabout is proposed to link the existing A12 to Braxted Road and Henry Dixon Road. Subsequently, Oak Road North will be closed and Oak Road south will be converted to a simple priority junction. (Subject to SoCG)
- New road bridge over the new A12 alignment, including 4m wide cycleway/footpath, to retain link to Braxted Road.
- Retention and extension of 3m Cycleway/footpath adjacent to the northbound carriageway to link with Braxted Road.
- New planted earth bunds south of The Drive to mitigate noise and visual impact.
- New road parallel with widened A12 to link Rivenhall End with Kelvedon and there will be a new Snivellers Lane WCH bridge to link Essex County Fire and Rescue HQ at Kelvedon Park. Hole farm and Kelvedon Park will have a private link road constructed south of the widened A12.
- Loss of two properties (Hare Lodge and Badgers).

### **Kelvedon**

- Accommodation has been provided for a potential future A120 link.
- Ashmans Bridge will be widened while Ashmans Farm footbridge will be demolished and repositioned slightly.
- Highfields Bridge and Ewell Bridge are both WCH bridges and will be demolished and replaced.
- A new all-directions Junction 24 will be constructed within a cutting south of Kelvedon with access to Inworth Road via a new roundabout.

### **Feering**

- Detrunked A12 between Feering and Marks Tey is not agreed and will be subject to SoCG for both the Council and ECC.
- New planted earth bunds south of Prested Hall cottages to mitigate noise and visual impact
- New road and WCH bridge constructed to link Colchester Road with Prested Hall, including temporary closure of footpath 78\_101 and new open space.

## **General**

- Permanent landtake of 647ha with additional temporary landtake of 188ha, including permanent loss of 395ha of arable land.
- Daytime two lane running will be maintained during weekday 06:00 to 21:00. Weekend and overnight closures when required, such as for bridge installation. Diversion proposed to be via A131 and A120, with impact on residents (266 noise sensitive receptors are identified) along the diversion route has been considered and assessed as unlikely to have a significant effect to population health.
- Widening of online sections would require traffic management such as speed restrictions, narrow lanes and contraflow systems.
- Local roads will be used for construction access and temporary traffic lights maybe required. Measures for controlling mud will be installed.
- Potential diversion of bus routes which utilise the A12 and Local Roads.
- Economic benefit for procurement at local small and medium enterprises.
- Positive benefits to local population for training, education and job opportunities.
- Details in the outline Construction Traffic Management Plan (CTMP).

## **5. Options**

- 5.1 Agree the recommendations thus agree delegated authority for a statement of common ground (and uncommon ground) with National Highways; this option is recommended.
- 5.2 Pursue a joint SoCG in partnership with neighbouring Local Authorities and/or ECC; a united viewpoint would speed up the examination in public and reduce workload however approval of a joint SoCG could cause delay due to complexity of governance.
- 5.3 Do not undertake an SoCG; this option would allow more time for the Council to set out its position on the issues but would likely cause delay and increase workload during the examination in public.

## **6. Financial Implications**

- 6.1 No financial implications.

## **7. Legal Implications**

- 7.1 *There are no legal implications arising out of this report.*

## **8. Other Implications**

- 8.1 No other implications identified.

## **9. Equality and Diversity Implications**

- 9.1 Section 149 of the Equality Act 2010 creates the public sector equality duty which requires that when the Council makes decisions it must have regard to the need to:
- (a) Eliminate unlawful discrimination, harassment and victimisation and other behaviour prohibited by the Act
  - (b) Advance equality of opportunity between people who share a protected characteristic and those who do not
  - (c) Foster good relations between people who share a protected characteristic and those who do not including tackling prejudice and promoting understanding.
- 9.2 The protected characteristics are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, gender and sexual orientation. The Act states that 'marriage and civil partnership' is not a relevant protected characteristic for (b) or (c) although it is relevant for (a).
- 9.3 The Equality Impact Assessment indicates that the proposals in this report will not have a disproportionately adverse impact on any people with a particular characteristic.
- 9.4 The SoCG does not have any EQIA implications. The main A12 proposals will be subject to detailed EQIA by the relevant decision maker.

## **10. List of Appendices**

- *Appendix 1: Draft Statement of Common Ground between BDC and National Highways*
- *Appendix 2: A12 widening consultation response*
- *Appendix 3: A12 widening supplementary consultation response*
- *Appendix 4: Adequacy of consultation response*
- *Appendix 5: ECC position on A12 widening project*

## **11. Background Papers**

- Draft Development Consent Orders, National Highways 2022
- General Arrangement Plans for A12 Chelmsford to A120 widening scheme, National Highways 2022 (as updated)
- Consultation Report for A12 Chelmsford to A120 widening scheme, National Highways 2022
- Environmental Statement for A12 Chelmsford to A120 widening scheme, National Highways 2022
- Design and Access Statement for A12 Chelmsford to A120 widening scheme, National Highways 2022
- Outline Construction Management Plan, National Highways 2022
- Replacement Land Statement, National Highways 2022

# A12 Chelmsford to A120 widening scheme

TR010060

## 9. Statement of Common Ground with Braintree District Council

Rule 8 (x)(x)

Planning Act 2008  
Infrastructure Planning (Examination Procedure)  
Regulations 2010

Volume 9

[Month/Year]

Infrastructure Planning

Planning Act 2008

The Infrastructure Planning  
(Examination Procedure) Rules 2010

**A12 Chelmsford to A120 widening scheme**  
**Development Consent Order 2022**

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**Statement of Common Ground with Braintree District Council**

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<b>Regulation Reference</b>	Rule 8 (x)(x)
<b>Planning Inspectorate Scheme Reference</b>	TR010060
<b>Application Document Reference</b>	TR010060/EXAM/9/X
<b>Author</b>	A12 Project Team and National Highways

<b>Version</b>	<b>Date</b>	<b>Status of Version</b>
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P01.1	08/11/21	S0 - INITIAL STATUS
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DRAFT

## STATEMENT OF COMMON GROUND

This Statement of Common Ground has been prepared and agreed by (1) National Highways Company Limited and (2) Braintree District Council.

Signed.....

[NAME]

Project Manager

on behalf of Highways England

Date: [DATE]

Signed.....

[NAME]

[POSITION]

on behalf of [STAKEHOLDER]

Date: [DATE]

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## 0 Executive Summary

## 1 Introduction

### 1.1 Purpose of this document

- 1.1.1 This Statement of Common Ground ("SoCG") has been prepared in respect of the proposed A12 to A120 Widening ("the Application") made by National Highways Company Limited ("National Highways") to the Secretary of State for Transport ("Secretary of State") for a Development Consent Order ("the Order") under section 37 of the Planning Act 2008 ("PA 2008").
- 1.1.2 This SoCG does not seek to replicate information which is available elsewhere within the Application documents. All documents are available in the deposit locations and/or the Planning Inspectorate website.
- 1.1.3 The SoCG has been produced to confirm to the Examining Authority where agreement has been reached between the parties to it, and where agreement has not (yet) been reached. SoCGs are an established means in the planning process of allowing all parties to identify and so focus on specific issues that may need to be addressed during the examination.

### 1.2 Parties to this Statement of Common Ground

- 1.2.1 This SoCG has been prepared by (1) National Highways as the Applicant and (2) Braintree District Council.
- 1.2.2 National Highways became the Government-owned Strategic Highways Company on 1 April 2015. It is the highway authority in England for the strategic road network and has the necessary powers and duties to operate, manage, maintain and enhance the network. Regulatory powers remain with the Secretary of State. The legislation establishing Highways England made provision for all legal rights and obligations of the Highways Agency, including in respect of the Application, to be conferred upon or assumed by National Highways.
- 1.2.3 **[DESCRIPTION OF STAKEHOLDER RESPONSIBILITIES].**

### 1.3 Terminology

- 1.3.1 In the tables in the Issues chapter of this SoCG, "Not Agreed" indicates a final position, and "Under discussion" where these points will be the subject of on-going discussion wherever possible to resolve, or refine, the extent of disagreement between the parties. "Agreed" indicates where the issue has been resolved.
- 1.3.2 It can be taken that any matters not specifically referred to in the Issues chapter of this SoCG are not of material interest or relevance to Braintree District Council and therefore have not been the subject of any discussion between the parties. As such, those matters can be read as agreed, only

to the extent that they are either not of material interest or relevance to Braintree District Council.

## 2 Record of Engagement

2.1.1 A summary of the meetings and correspondence that has taken place between National Highways and **Braintree District Council** in relation to the Application is outlined in table [2.1].

**Table 2.1 Record of Engagement**

Date	Form of correspondence	Key Topic discussed and key outcomes (the topics should align with the Issues tables)
w/c 23 May 2016	Letter/Email	To ensure that local political representatives are informed of activity and are aware of the significant and reason for that activity.
27 June 2016	Letter/Email	Contact key local authorities to identify single point of contact and request a meeting.
July/August 2016	Meeting	Engage with identified officer-level contact for key local authorities to discuss programme for the project, communications and understand local plans and issues which might impact the development of options.
w/c 4 July 2016	Email	Issue forum invitations as applicable - Make initial contact with potential forum members. Introduction to the scheme and the purpose of the forums, request representation.
July 2016	Meetings	Engagement with relevant stakeholders to gather information to support development of drainage strategy.
16 Sept 2016	Meeting	Members Forum - To inform forum members about the consultation and the principles of a good consultation, as well as providing a project update.
26 Sept 2016	Meeting	To inform forum members about the consultation and the principles of a good consultation, as well as providing a project update.
8 Nov 2016	Meeting	NMU Workshop - Early engagement with technical stakeholders to get understanding of key issues.
10 Nov 2016	Meeting	Road Users workshop - Early engagement with technical stakeholders to get understanding of key issues.
25 Nov 2016	Meeting	Members Forum - Update on progress and the forthcoming consultation, preview of materials for consultation. Update on emerging options / preview options identified for engagement.
1 Dec 2016	Meeting	To inform forum members about traffic modelling and sifting, as well as providing a project update.

Date	Form of correspondence	Key Topic discussed and key outcomes (the topics should align with the Issues tables)
24 Jan 2017	Meeting	Provide early sight of consultation materials and exhibition
Jan-April 2017	Emails/Meeting	Data collection / input to the assessment (discussions with key stakeholders) - Present the final alignment and gather feedback to inform the detailed design and assessment stages.
5 April 2017	Meeting	DCO Planning Workshop - To go through the DCO process with the local authority planning leads, and explain what their involvement will be in the process.
19 May 2017	Meeting	Consultation Response Meeting - To discuss their consultation response and answer any specific questions they may have.
23 May 2017	Meeting	Environment Workshops - Three workshops to provide the opportunity to discuss technical issues and to gather feedback for next steps.
7 July 2017	Meeting	Members Forum - To inform forum members about the consultation, as well as providing a project update.
3 August 2017	Meeting	Community Forum (West) - To inform forum members about the consultation, as well as providing a project update.
Jan 2018	Meeting	5 <sup>th</sup> round of forums - The purpose of this forum will be to maintain relationships. Topics to be covered include: Scheme update Forum format going forward Environmental Impact Assessments
May 2018	Email/ Letter	The purpose of the letter is to flag up the update to the website and explain timescales where possible.
12 July 2019	Meeting	Members' Forum - Provide an overview of the A12 scheme, including work that has taken place to date and provide an update on the way forward for the scheme.
24 July 2019	Meeting	Community Forum - Provide an overview of the A12 scheme, including work that has taken place to date and provide an update on the way forward for the scheme.
3 October 2019	Meeting	Members forum - Provide an overview of the A12 scheme, including work that has taken place to date and provide an update on the way forward for the scheme, with a focus on the upcoming consultation.
14 October 2019	Meeting	Community forum - Provide an overview of the A12 scheme, including work that has taken place to date and provide an update on the way forward for the scheme, with a focus on the upcoming consultation.

Date	Form of correspondence	Key Topic discussed and key outcomes (the topics should align with the Issues tables)
22 June 2020	Online Meeting	Meeting with traffic and planning to discuss modelling and local developments
21 July 2020	Online Meeting	To discuss the updates at junctions 20a/20b and the new junction 21.
14 August 2020	Online Meeting	To discuss the updates at junction 22.
19 August 2020	Online meeting	To provide a scheme update: <ul style="list-style-type: none"> <li>• Project update</li> <li>• Overview of how the schemes will now be drawn back together</li> <li>• Overview of how, when a PRA is announced, it will be managed (publicity etc)</li> </ul>
15 September 2020	Online workshop	To discuss the updates of designing junction 24.
1 October 2020	Online workshop	To discuss the updates of designing junction 24.
24 November 2020	Online workshop	Local Roads workshop - To discuss the road strategy.
4 December 2020	Online meeting	Meeting with LPAs to discuss SoCC draft - To get input on SoCC before we consult on it
4 February 2021	Online workshop	Junction 22 workshop - Provide an update on design fix 1 and get feedback.
26 February 2021	Online workshop	Junction 24 workshop - Provide an update on design fix 1 and get feedback.
26 February 2021	Online workshop	Junction 25 workshop - Provide an update on design fix 1 and get feedback.
4 March 2021	Online workshop	Local roads workshop (including junction 21) - Provide an update on design fix 1 and get feedback.
11 May 2021	Online workshop	Junction 19 to 22 workshop - Provide an update on design fix 2 and get feedback.
18 May 2021	Online workshop	Junction 25 and junction 25 workshop - Provide an update on design fix 2 and get feedback.
24 May 2021	Online workshop	Detrunking workshop - Provide an update on design fix 2 and get feedback.
9 June 2021	Email	Send final SoCC and explaining any changes following consultation.
7 June 2021	Online meeting	Members Forum – to provide an update on the project
29 September 2021	Online meeting	A12 workshop - To discuss the next steps for the project, including further consultations
7 October 2021	Online meeting	Members Forum – to provide an update on the project
3 March 2022	Online meeting	Members Forum – to provide an update on the project



Date	Form of correspondence	Key Topic discussed and key outcomes (the topics should align with the Issues tables)
12 May 2022	Online meeting	SOCG meeting - To discuss the Statement of Common Ground with Braintree District Council
9 June 2022	Online meeting	SOCG meeting - To discuss the Statement of Common Ground with Braintree District Council
22 July 2022	Online meeting	Members Forum – to provide an update on the project
1 September 2022	Online meeting	SOCG meeting – To discuss the Statement of Common Ground with Braintree District Council
21 September 2022	Online meeting	SOCG meeting – To discuss the Statement of Common Ground with Braintree District Council
13 October 2022	Online meeting	SOCG meeting – To discuss the Statement of Common Ground with Braintree District Council
2 November 2022	Online meeting	SOCG meeting – To discuss the Statement on Common Ground with Braintree District Council

2.1.2 It is agreed that this is an accurate record of the key meetings and consultation undertaken between (1) National Highways and (2) **Braintree District Council** in relation to the issues addressed in this SoCG

### 3 Issues

#### 3.1 Issues related to the Environmental Statement (ES)

Table 3.1 Issues Related to the Environmental Statement (ES)

Ref	Issue	Doc Reference	Braintree District Council (BDC) Position	National Highways Position	Status	Date
1.1	Environment - Population	Environmental Statement: Chapter 13: Population and human health [TR010060/APP/6.1]	<i>National Highways are under projecting household and population growth in the district. We believe population increase will be around 20% and the assessment should assign High value and sensitivity along with Chelmsford, Colchester and Maldon.</i>	The assessment in Table 13.8 in Chapter 13: Population and human health, of the Environmental Statement [TR010060/APP/6.1] takes on board this local advice and now considers the sensitivity of the housing resource in Braintree as 'high' in line with the neighbouring districts in the study area.	BDC agree that the EIR appropriately takes Braintree's growth into account.	01/09/2022
1.2	Environment - Landscaping	Environmental Statement: Chapter 13: Population and human health [TR010060/APP/6.1]	<i>Highways England will become an extensive landowner of areas adjacent to Hatfield Peverel, Witham, Rivenhall End and Feering following the A12 widening scheme. These land uses include areas for drainage attenuation, ecological and landscape mitigation plans within the DCO boundary. These areas would include directly adjacent land to existing settlements and planned developments at:</i>	On 17 March 2022 an Environmental Impacts and Mitigation Workshop was held where Biodiversity, Arboriculture, Landscape & Visual topics were covered and discussed.  The presentation and meeting note have been shared following this workshop.  Chapter 13 of the Environmental Statement	02/11/22 Update – BDC and Witham Town Council to decide if replacement land will be managed directly or if commuted sum is preferable.	

Ref	Issue	Doc Reference	Braintree District Council (BDC) Position	National Highways Position	Status	Date
			<ul style="list-style-type: none"> <li>• <i>West of Bury Lane, Hatfield Peverel</i></li> <li>• <i>East of Gleneagles Way, Hatfield Peverel</i></li> <li>• <i>West of Wood End Farm, Witham</i></li> <li>• <i>Land adjacent to Meadows, South East Witham</i></li> <li>• <i>Land at Inworth Road, Feering</i></li> </ul> <p><i>In these areas, opportunities for improving access to semi natural and formal greenspace should be explored to contribute positively to physical and mental health. Circular routes for recreational use would contribute to encouraging a healthy, active lifestyle.</i></p>	<p>[TR010060/APP/6.1] will provide an assessment of impacts on the wider determinant of health 'access to greenspace and outdoor recreation', which is a protective factor for both mental and physical health. Some improvements have been identified to access greenspace for residents in the Braintree District.</p> <p>This can be discussed further at meeting on w/c 9<sup>th</sup> May 2022.</p>		
1.3	Environment - Noise	<p>Environmental Statement: Chapter 12: Noise and vibration [TR010060/APP/6.1]</p> <p>First iteration Environmental Management Plan [TR0100/APP/ 6.5]</p>	<p><i>Where the PIER concludes that noise barriers may not offer value for money – e.g. south of A12 at Hatfield Peverel and at Dengie Farm House or where there is an increase in noise level due to operational noise, then it would also be appropriate to confirm that there is adequate baseline assessment at such locations and confirmation that the ability to achieve internal noise levels given in BS8233 Table 4 and the ability to control the thermal comfort within the relevant</i></p>	<p>On 16 March 2022 an Environmental Impacts and Mitigation Workshop was held where Noise &amp; Vibration; Air Quality; Climate topics were covered and discussed</p>	02/11/22 – BDC to confirm the assessment within the EIR.	

Ref	Issue	Doc Reference	Braintree District Council (BDC) Position	National Highways Position	Status	Date
			<i>dwelling is not adversely affected more so than the 'do minimum' scenario.</i>			
1.4	Environment – Human Health	Environmental Statement: Chapter 13: Population and human health [TR010060/APP/6.1]	<i>We note that table 13.7 shows that Witham scores significantly poorly across a range of physical health measures. The Environmental Statement should also include socio-economic measures to show why Witham scores worse than its peers to further understand the matter. Any mitigation measures for inequality (to be included in the Environmental Statement), any legacy improvement funds and accessibility, should improve outcomes at this location. It is acknowledged that consultation with the local Director of Public Health will be undertaken.</i>	Socio-economic indicators will be included as part of the human health baseline in Chapter 13: Population and human health, of the Environmental Statement [TR010060/APP/6.1]. It should be noted that health indicator data has been updated since the dataset used in the PEIR which show a narrowing of health and socio-economic inequality between wards in Witham compared to average for England.  Opportunities for Designated Funds can be discussed in the meeting on w/c 9 <sup>th</sup> May 2022.	UPDATE 02/11/22 – WCH opportunities in Braintree shared with BDC.	
1.5	Environment – Air Quality		<b>BDC TO PROVIDE WORDING</b>			
1.6	Environment – Human Health	Environmental Statement: Chapter 13: Population and human health [TR010060/APP/6.1]	<i>The human health study area in the assessment as shown on figure 13.1 should include Nounsley, although the addition of this village is unlikely to affect overall outcomes.</i>	The village of Nounsley is outside of the study area for air quality and noise, as well as outside of the land use and accessibility study area as defined by DMRB LA 112. It is	BDC agree that the EIR takes into account.	01/09/2022

Ref	Issue	Doc Reference	Braintree District Council (BDC) Position	National Highways Position	Status	Date
				<p>not considered there would be any likely significant effects for this village that warranted a need to extend the study areas.</p> <p>However, the village has been considered in the wider context of likely origins and destinations for people who may interact with the land use and accessibility study area.</p>		
1.7	Environment – Human Health	Design and Access Statement [TR010060/APP/7.4]	<i>In correlation with existing communities and proposed developments, there should be a focus on severance issues at these geographical locations: between Hatfield Peverel and Witham at Junction 21, Maldon Road underpass to the south of Witham, Braxted Road, south of Rivenhall End, Inworth Road, Feering and Prested Hall, Feering.</i>	<p>The Scheme's walking, cycling and horse-riding (WCH) strategy is outlined in the Design and Access Statement.</p> <p>This has been shared and discussed with Braintree District Council.</p> <p>Discussions on WCH have been ongoing with Essex County Council who, as the Highway authority, take the lead on this aspect of the project.</p>	<p>BDC agreed that severance issues have been adequately taken into account in the EIR.</p> <p>Detrunking the former A12 at Rivenhall to be considered as this design evolves.</p>	01/09/2022
1.8	Environment – Contaminated Landx	Environmental Statement: Chapter 10: Geology and Soils [TR010060/APP/6.1]	<i>As Braintree District Council is the regulator for contaminated land within the district area, it supports the intention to carry out further investigation</i>	<p>Further ground investigation is being undertaken in this area.</p> <p>No significant effects from contaminated land on surface water or groundwater</p>	Agreed.	01/09/2022

Ref	Issue	Doc Reference	Braintree District Council (BDC) Position	National Highways Position	Status	Date
			<p><i>(including ground gas monitoring) particularly at the landfill area at Witham (vicinity of Whetmead nature reserve of Blackwater Lane in Witham) so that the construction methodology can be developed to prevent significant risk to end users including construction workers and buildings. It is further noted that there will be a strategy in the event of unexpected contamination during excavations and further assessment of the potential for contamination of groundwater alongside construction works. It is assumed that assessment of risks to groundwater will include liaison with the Environment Agency.</i></p>	<p>receptors were identified in Chapter 10: Geology and soils of the Environmental Statement [TR010060/APP/6.1].</p> <p>To avoid impacts to sensitive receptors from any land contamination exposed during construction, risk assessment and method statements would be completed as part of the construction phase with reference to controls identified within the Register of Environmental Actions and Commitments, which is part of the first iteration Environmental Management Plan (EMP) [TR010060/APP/6.5].</p> <p>Appendix D of the first iteration EMP [TR010060/APP/6.5] contains the Land Contamination Management Plan. This includes the procedures that would be followed if unexpected contamination is discovered during construction works. This will be further developed during the detailed design before construction begins.</p>		

Ref	Issue	Doc Reference	Braintree District Council (BDC) Position	National Highways Position	Status	Date
				Regular engagement has continued with the Environment Agency. On 3 March we met to discuss the results of the hydrogeology assessment, including a run-through of the likely effects on groundwater and the proposed mitigation.		

### 3.2 Issues related to engagement

Table 3.2 Issues related to engagement

Ref	Issue	Doc Reference	Braintree District Council Position	National Highways Position	Status	Date
2.1	Engagement	5.1 Consultation Report	<i>At the first preferred options consultation, the Council supported the A12 widening in principle and stated preference for strategic offline routes for both options north of Witham, between J22 and J23 to avoid Rivenhall, and also between J24 and J25 to avoid demolition of properties.</i>	Full detail of the options consultation can be viewed in the Consultation Report.	Noted.	01/09/2022
2.2	Engagement	5.1 Consultation Report	<i>National Highways have engaged stakeholders extensively throughout the</i>	The project team have continued engagement throughout all stages of development, from early	Noted.	01/09/2022



Ref	Issue	Doc Reference	Braintree District Council Position	National Highways Position	Status	Date
			<i>informal consultation stages from RIS2 project bidding in 2014, and through two rounds of preferred options consultation between 2017 and 2020, to preliminary design stage. At the first preferred options consultation, the Council supported the A12 widening in principle and stated preference for strategic offline routes for both options north of Witham, between J22 and J23 to avoid Rivenhall, and also between J24 and J25 to avoid demolition of properties.</i>	engagement through to consultations and beyond.  We will continue to engage with BDC throughout this process.		

### 3.3 Issues related to construction

Table 3.3 Issues related to construction

Ref	Issue	Doc Reference	Braintree District Council Position	National Highways Position	Status	Date
3.1	Construction compounds	Outline Construction Traffic Management	<i>Location of the two main construction compound locations at J21 Witham South and J22 Witham</i>	The two main compounds have been selected after an optioneering process where	BDC happy to agree that the issues will be	02/11/2022.

Ref	Issue	Doc Reference	Braintree District Council Position	National Highways Position	Status	Date
		Plan [TR010060/APP/7.7]  First iteration Environmental Management Plan [TR0100/APP/ 6.5]	<i>North is reasonably logical and generally supported by the Council. We expect a full assessment to be provided and mitigation should be minimised, particularly on residential and PROW receptors. Negative impact from noise and lighting at night during construction phase should be minded, with respect that both compounds are at edge-of settlement locations. We note a lack of detail for the restoration of these sites post construction and request that this is part of the Environment Statement.</i>	<p>consideration was given to a broad range of environmental factors. All our compounds will have mitigation measures in place to minimise the impacts from light, noise and dust pollution, these include the following:</p> <ul style="list-style-type: none"> <li>- Lighting will be directed away from properties and will be provided to enable the safety and security of the compounds.</li> <li>- Soil bunds will be placed strategically on compound boundaries to shield residents from the activities carried at out at the compound.</li> <li>- Noisy activities associated with concrete and asphalt batching plants have been placed further from the residents.</li> <li>- The surface will be a bound surface to reduce dust from moving vehicles, where this is not possible the surface will be subject to dust suppression measures.</li> </ul>	<p>handled in the planning application and will not be issues for the DCO.</p> <p>02/11 – EH to check all issues are covered in the planning application in advance.</p>	

Ref	Issue	Doc Reference	Braintree District Council Position	National Highways Position	Status	Date
				<p>- Speed limits will be implemented which will help to reduce noise, dust and vehicle emissions.</p> <p>Further details have been provided in the Environmental Statement (ES) and First Iteration Environmental Management Plan</p> <p>Compound arrangements, are available in the Construction Compound Plans</p>		

### 3.4 Issues related to traffic

Table 3.4 Issues related to traffic

Ref	Issue	Doc Reference	Braintree District Council Position	National Highways Position	Status	Date
4.1	Traffic	<p>Environmental Statement: Chapter 13: Population and human health [TR010060/APP/6.1]</p> <p>Transport Assessment: Appendix A: Junction</p>	<p><i>When comparing the baseline household formation used against Local Plan housing growth targets, we believe there is a risk that the assumptions used for population projections in Braintree District, as built into the modelling (including the traffic modelling), underestimates household growth and is flawed. Subsequently, the</i></p>	<p>The assessment in Chapter 13: Population and Health, of the Environmental Statement [TR010060/APP/6.1] takes on board this local advice and will consider the sensitivity of the housing resource in Braintree as 'high' in line with the</p>	Agreed.	02/11/2022.

Ref	Issue	Doc Reference	Braintree District Council Position	National Highways Position	Status	Date
		Modelling Results Summary [TR010060/APP/7.2]	<p><i>assessment is also incorrect.</i></p> <p><i>This methodology followed has resulted in land south of Feering/west of the A12 and Towerlands which are strategic growth locations for 795 and 575 dwellings being omitted from the core scenario. Additionally, significant sites with planning permission over 50 (although this threshold does not appear to apply to some core scenario sites) in Cressing and Silver End are not listed which should be modelled.</i></p>	neighbouring districts in the study area.		
4.2	Traffic	Environmental Statement: Appendix 3.2 Maldon Road and Hatfield Peverel Bypass Technical Report [TR010060/APP.6.3]	<p><i>To understand the impact of additional congestion at Hatfield Peverel by 2027 and 2042, we would expect confirmation of queuing times for the junction of B1019 / B1137 as a result of the development.</i></p> <p><i>BDC will need to work with Highways England, Maldon District Council and Essex County Council to address local highways issues including the issues related to Maldon traffic entering Hatfield Peverel and the possibilities of a 'Hatfield Peverel bypass'</i></p>	<p>Environmental Statement: Appendix 3.2 Maldon Road and Hatfield Peverel Bypass Technical Report [TR010060/APP.6.3] details the Schemes position on Maldon Road and Hatfield Peverel Bypass.</p> <p>This has been discussed with Braintree District Council and Essex County Council who, as the Highway authority, take the lead on this aspect on the Scheme.</p>	The Council defers to the opinion of Essex County Councils the highway authority with regard to technical design matters.	02/11/2022.

Ref	Issue	Doc Reference	Braintree District Council Position	National Highways Position	Status	Date
4.3	Traffic		<p><i>There would be an additional 6-7% peak hour traffic on Maldon Road by 2042 – we are unclear if rising use is from new residential development at Hatfield Peverel and Maldon, or induced demand as a result of the route becoming more attractive in comparison to the A414 via Danbury.</i></p>	<p>The increase in traffic on Maldon Road by 2042 reflects a change in traffic due to the proposed A12 scheme, i.e. in comparison to a scenario where the scheme is not built. Any new residential development is therefore included in both the 'with' and 'without' scenarios, so is not the cause of the increase in traffic on Maldon Road.</p> <p>The increase on Maldon Road is mainly due to people switching from Church Road Hatfield Peverel to Maldon Road, as most traffic would be directed to head east to the new junction 21 to join the A12, instead of heading west to use junction 20a/20b. There is not predicted to be a significant increase in traffic on the A414 route via Danbury.</p>	The Council defers to the opinion of Essex County Councils the highway authority with regard to technical design matters.	02/11/2022.

### 3.5 Issues related to local plans

**Table 3.5 Issues related to local plans**

Ref	Issue	Doc Reference	Braintree District Council Position	National Highways Position	Status	Date
5.1	Local plans	Environmental Statement: Chapter 13: Population and human health [TR010060/APP.6.1]	<i>For the period up to 2042, Local Planning Authorities are being expected to deliver their housing need as set out in the standard methodology produced by MHCLG. This provides a consistent baseline, regardless of the actual status of the current Local Plan for all Local Planning Authorities in the area. Housing need in the standard methodology includes an affordability uplift which would result in a step-change increase to past population trends. Chelmsford and surrounding districts is one of the least affordable locations in the country.</i>	The assessment in Chapter 13: Population and Health, of the Environmental Statement [TR010060/APP/6.1] will take on board this local advice and now considers the sensitivity of the housing resource in Braintree as 'high' in line with the neighbouring districts in the study area.	Agreed, as above.	02/11/2022.
5.2	Local plans	Environmental Statement: Chapter 13: Population and human health [TR010060/APP.6.1]	<i>For the baseline assessment, the housing allocations and planning applications used (Table 13.6) are inaccurately identified and the number of dwellings at each site needs updating. The table should reflect all planning applications granted permission or pending decision: Hatfield Peverel - 224, Gleneagles Way - 100, Wood End Farm - 400, Land at Feering - 795, Land off Inworth Road, Feering – 40, and those likely to be</i>	The information provided by Braintree District Council have been used in the assessment in Chapter 13: Population and Health, of the Environmental Statement [TR010060/APP/6.1].  The long and short lists were sent to BDC 21st February 2022. These contain the developments that have been used in Chapter 16:	Agreed. <b>BDC to review.</b>	

Ref	Issue	Doc Reference	Braintree District Council Position	National Highways Position	Status	Date
			<p><i>granted planning permission. These residential allocations are not all spatially represented on Figure 13.1 (e.g. Land at Gleneagles Way).</i></p> <p><i>We also request that we can fact-check the population, planning data used and the cumulative impact assessment in the draft Environmental Statement before submission into the DCO.</i></p>	Cumulative effects assessment, in the Environmental Statement [TR010060/APP/6.1].		

### 3.6 Issues related to detrunking

Table 3.6 Issues related to detrunking

Ref	Issue	Doc Reference	Braintree District Council Position	National Highways Position	Status	Date
6.1	Detrunking		<p><i>Considering the importance of co-ordinating detrunking the A12 with a strategic vision for land use at communities in Witham, Rivenhall End and Feering, our preference would be to establish a legacy fund to be drawn on for detrunking at a later date.</i></p>	National Highways' Operational Team has developed the following principles for de-trunking standards that National Highways will seek to agree with Essex County Council:	The Council defers to the opinion of Essex County Councils the highway authority with regard to technical design matters.	02/11/2022.

Ref	Issue	Doc Reference	Braintree District Council Position	National Highways Position	Status	Date
				<ol style="list-style-type: none"> <li>1. The de-trunked assets will meet the standard of safe and serviceable operation, as set out in the Design Manual for Roads and Bridges.</li> <li>2. The condition of the de-trunked roads will be similar to other comparable roads on the Strategic Road Network as measured by the Pavement Condition Key Performance Indicator in Roads Investment Strategy 2: 2020 – 2025 (or any relevant replacement from time to time in force).</li> <li>3. Prior to de-trunking, maintenance will have been undertaken in accordance with an intelligence-led system designed to achieve optimum intervention for each individual asset by improving asset quality and customer satisfaction</li> </ol>	BDC agree that collaborative dialogue is being undertaken between stakeholders.	



Ref	Issue	Doc Reference	Braintree District Council Position	National Highways Position	Status	Date
				<p>whilst offering greater value for money.</p> <p>4. Maintenance schemes for de-trunked assets which have previously been identified for delivery through funding in Road Investment Strategy 3: 2025 to 2030 will be completed or funded by National Highways.</p>		

## Acronyms

Abbreviation	Term
ECC	Essex County Council
BDC	Braintree District Council
SoCG	Statement of Common Ground

DRAFT

## Glossary

Term	Definition

DRAFT

## References

DRAFT

# Appendix A

[INSERT RELEVANT DOCUMENTS NOT FORMING PART OF THE APPLICATION THAT ARE REFERENCED IN THE SOCG E.G. EMAILS/MEETING NOTES/DATA].

## A.1 Appendix Heading 2

A.1.1 Appendix numbered para text

## Appendix Heading 3

A.1.2 Appendix numbered para text

## Appendix Heading 4

A.1.3 Appendix numbered para text

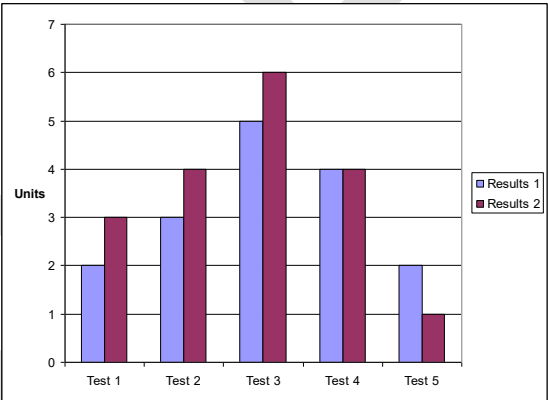


Table A.2 Use 'Table Plate Caption' Style

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Our ref:  
Your ref:

Ask for: Mr Gary Sung  
Dial: 01376 552525  
Ext: 2525

Date: Thursday, 12 August 2021

Sustainable Development  
Causeway House  
Braintree  
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RE: A12 widening consultation response letter

By email only.

This letter comprehensively covers Braintree District Council's (BDC) views on all of the questions within the online response form for the Preliminary Design including issues at:

- Scheme design at Junctions 21, 22 and 24 (excludes J19 and J25 which are not with the district);
- Comments on the PIERS and suggestions for environmental improvements;
- Walking, cycling and horse riding routes within the district;
- Bypass between J22 and J23, and between J24 and J25; and
- Construction impacts and construction methodology.

The A12 is one of 3 strategic transport routes, alongside the A120 and GEM, in the District and it links London and the ports of Felixstowe and Harwich to Witham, Hatfield Peverel, Kelvedon, Feering and Rivenhall End. Strategic highways have a wide catchment area which includes communities such as Silver End, Cressing, Tye Green, Coggeshall and Braintree (including Great Notley), as well as towns and communities in neighbouring districts at Maldon, Tiptree and Wickham Bishops.

## 1. Consultation

- 1.1. BDC welcomes the opportunity of comment on the statutory consultation for the A12 Chelmsford to A120 Widening scheme.
- 1.2. Highways England have engaged stakeholders extensively throughout the informal consultation stages from RIS2 project bidding in 2014, and through two rounds of preferred options consultation between 2017 and 2020, to preliminary design stage. At the first preferred options consultation, the Council supported the A12 widening in principle and stated preference for strategic offline routes for both options north of Witham, between J22 and J23 to avoid Rivenhall, and also between J24 and J25 to avoid demolition of properties. At the second preferred options consultation, the Council expressed support for route options which allowed the A12 bypass south of Rivenhall End and south of Prested Hall to preserve its historic landscape setting.
- 1.3. The Council have made further comments at officer and member level engagement workshops, particularly from the beginning of 2021 onwards after the presentation of design fix 1 where Highways England were able to present a red line boundary. There was some evolution of the detailed design work through a collaborative process with councils at all levels.
- 1.4. The team have showed willingness to explore alternatives within a reasonable envelope. A good example is the preservation of the avenue of trees which provides historical context to Prested Hall and minimising felling of mature trees along its approach. While the Council has objected to offline routing of the carriageway in front of Prested Hall, preferring options to the rear, a reasonable compromise has been made. We also commend the time taken to fully consider accommodating a new settlement at Marks Tey, although of course that option is no longer being taken forward as part of the Council's Local Plan to 2033.
- 1.5. Nevertheless, the Council remains disappointed that many details of the A12 widening scheme were not revealed until, or produced at a late stage with some construction details released just before preliminary design consultation. The release of this consultation and the PIERS heralded quite a few surprises, and not all existing issues were concluded at engagement events, in particular:
  - Junction 21 – no resolution to mitigation of additional induced traffic at the junction of B1019 / B1137 (aka Duke of Wellington roundabout);
  - Details of new 3m high noise barriers at Hatfield Peverel;
  - The location and detail of the 2 construction compounds; and
  - Construction and land use plans for land west of existing A12 potentially impacting upon the layout of the strategic growth location at Inworth Road, Feering.

- 1.6. Furthermore, the Council is disappointed that progress on a Planning Performance Agreement (PPA) has not been made such that a lack of resources has negatively impacted the level of specialist advice we are able to provide in this consultation. i.e. There is a lack of time and funding for specialist landscape advice.
- 1.7. We have also been involved in formulating the Statement of Community Consultation and welcome the proposals and commitments to consulting local communities and keeping them informed.

## **2. Summary of Issues**

- 2.1. In our response, the Council has detailed a number of specific points which we have highlighted as follows:

### **Baseline population estimates:**

- 2.2. As per our detailed comments at paragraph 4.2, when comparing the baseline household formation used against Local Plan housing growth targets, we believe there is a risk that the assumptions used for population projections in Braintree District, as built into the modelling (including the traffic modelling), underestimates household growth and is flawed. Subsequently, the assessment is also incorrect.

### **Traffic modelling report:**

- 2.3. To understand the impact of additional congestion at Hatfield Peverel by 2027 and 2042, we would expect confirmation of queuing times for the junction of B1019 / B1137 as a result of the development.
- 2.4. For the traffic modelling report, we also analysed the sites which are included in the model across the five local authorities and we believe the methodology used to include or exclude a site is deeply inconsistent. We will be happy to work with Highways England to ensure that they have the latest planning information available.

### **Air Quality:**

- 2.5. We note there is a good overall outcome on air quality projections. Although there will be some adverse effects, increases are not determined as significant nor present an exceedance of air quality objective levels, and that includes during the construction phase. This is particularly important for certain parts of the District e.g. Hatfield Peverel, where the air quality is regularly raised by some residents as an objection to further development and has also been mentioned in relation to this scheme.

### **Noise and Vibration:**



- 2.6. For noise impact during construction, we would require that works resulting in significant adverse effects due to noise are avoided during the nighttime period.

**Population and Health:**

- 2.7. In the population and health chapter of the Piers, we think that the human health study area in the assessment (figure 13.1) should include the village of Nounsley (part of the parish of Hatfield Peverel) as well.
- 2.8. There is also not enough detail at paragraph 13.9.6 to show how engagement and participation proposed would fully or partially potential mitigate health issues during construction. The mental health impacts arising from loss of employment due to a number of businesses losing passing trade is also unaccounted for.
- 2.9. Highways England will become an extensive landowner of areas adjacent to Hatfield Peverel, Witham, Rivenhall End and Feering following the A12 widening scheme. We welcome exploration of potential for opportunities to improving access to semi-natural and formal greenspace which will contribute positively to physical and mental health.

**PIERS overall comments:**

- 2.10. We have noted that the baseline assessment (table 13.6) used housing allocations and planning applications which are out-of-date. Due to these issues, its apparent that Piers overall won't take into account all residential and non-residential development likely to be completed before first year of construction.
- 2.11. Based on the information provided, Braintree District Council does not consider that the PIERS provides sufficient information to make a full assessment on the environmental impact of the development on the environment – we expect the Environmental Statement to rectify this issue.
- 2.12. We also request that we can fact-check the population, planning data used and the cumulative impact assessment in the draft Environmental Statement before submission into the DCO.

**Detrunking the A12:**

- 2.13. Considering the importance of co-ordinating detrunking the A12 with a strategic vision for land use at communities in Witham, Rivenhall End and Feering, our preference would be to establish a legacy fund to be drawn on for detrunking at a later date.

### 3. Scheme Design

- 3.1 A widening upgrade between J19 and J25 to three lanes in each direction would also include a bypass for Rivenhall End and rationalised, newly constructed junctions for J21, J22 and J24 (removing J20 and J23). For our residents, it would improve journey times, reliability and safety on the network while generally having environmentally beneficial effects for the residents of Hatfield Peverel, Rivenhall End and Kelvedon and Feering. Infrastructure investment would be consistent with the aims of SP3 and SP6 of the North Essex Authorities (NEA) Section 1 Local Plan, which supports improved road infrastructure to reduce congestion and provide more reliable journey times. The scheme is also consistent with Section 2 Local Plan's spatial strategy to concentrate development on the A12/GEML corridor and supports our vision for growth and economic development.
- 3.2 The overall design principles for widening and upgrading the A12 to expressway standard is supported, new alignments which bypass Rivenhall End and proposed upgrade of junctions 21, 22 and 24 to all directions is welcomed by BDC. There are multiple significant benefits, including safety, noise and vibration, air quality and population and health as identified in the PIERS, of removing strategic traffic from the villages of Rivenhall End, Kelvedon and Feering. The proposals also create additional capacity on local roads and potentially improves access to sustainable travel via the detrunked road.
- 3.3 BDC is pleased to see the consolidation of J20a, J20b and J21 such that there's no longer any split junctions with unnecessary traversing through The Street, Hatfield Peverel and Newlands Street, Witham.
- 3.4 The traffic modelling report notes that there would generally be beneficial changes at Rivenhall and Kelvedon but a mix of beneficial and adverse change on local roads at Hatfield Peverel. At the core of the issues at Hatfield Peverel is a lack of capacity on existing local roads, i.e. the street and the junction of B1019/B1137 (also known as Duke of Wellington roundabout) to accommodate the demand for strategic road access. As the report notes at para 6.3.10:

*"Due to projected growth in the area, the junction with The Street and Maldon Road may struggle to work adequately in the future. While this is expected to happen with or without the proposed scheme going ahead, our new junction 21 location does change how the traffic moves around the junction."*

- 3.5 Some residential properties fronting The Street to the east of Hatfield Peverel would see an increase of 140% to 170% post construction. There would be an additional 6-7% peak hour traffic on Maldon road by 2042 – we are unclear if rising use is from new residential development at Hatfield Peverel and Maldon, or induced demand as a result of the route becoming more attractive in comparison to the A414 via Danbury. This junction is a strained part of the local highways network such that even 6-7% could result in long

delays due to queuing traffic.

- 3.6 We would expect confirmation of queuing times at 2027 and 2042. Any mitigation must also be aware of severance issues and the character and setting of the village. BDC will need to work with Highways England, Maldon District Council and Essex County Council to address local highways issues including the issues related to Maldon traffic entering Hatfield Peverel and the possibilities of a 'Hatfield Peverel bypass'.
- 3.7 Location of the two main construction compound locations at J21 Witham South and J22 Witham North is reasonably logical and generally supported by the Council. We expect a full assessment to be provided and mitigation should be minimised, particularly on residential and PROW receptors. Negative impact from noise and lighting at night during construction phase should be minded, with respect that both compounds are at edge-of-settlement locations. We note a lack of detail for the restoration of these sites post construction and request that this is part of the Environment Statement.
- 3.8 BDC supports the principle of an all-directions J22 and notes that there would be a significant increase of traffic, 34% am and 26% pm peaks, post construction. Eastways junction should ideally be a free-flowing junction which is futureproofed for additional growth, currently planned and forecast background growth, at north Witham, Cressing and at Silver End.
- 3.9 Similarly, the Council supports the principle of moving J24 to the south of Feering on Inworth Road which would reduce strategic traffic traversing through Kelvedon High Street. We note that two-way traffic going north on Inworth Road would be significantly reduced however Domsey Brook, which has no footpath, and Gore Pit Junction would continue to be a local highways issue.
- 3.10 The council has no comments on changes for the design of junctions 19 and 25.

## **4. PIERS**

- 4.1 For context, reference should be made to the Planning Act 2008: guidance on the pre-application process for major infrastructure projects, in particular paras 93 to 94 which states:
- The PIERS should enable consultees to develop an informed view of the project;
  - The information must provide clarity to all consultees; and
  - That there will be the opportunity for both the design of the proposed development and the EIA to take into consideration any comments received.

## **Baseline population in the PIERS**

- 4.2 One of the fundamental pillars for Environmental Assessment and the traffic modelling will be the baseline development and population estimates. There is a risk that the assumptions built into the modelling is flawed and subsequently, the assessment is incorrect.
- 4.3 Highways England use the ONS 2018 household projections in their modelling however BDC would question the lower growth in those projections and the demographic factors (mortality rates) compared to 2014 based Sub-national household projections. We consider the components of growth in the 2014 SNPP to be reliable.
- 4.4 The 2018 household projections being used are in stark contrast with the much higher levels of growth to which we are committed to in the adopted Local Plan target, of which 83% is now committed in permissions. This is because ONS 2018 projects forward the lower levels of development in the District's past as reflected in the short-term trend-based migration assumptions used in the projections.
- 4.5 While we can understand the attraction of using a dataset in the modelling (the Sub-national household projections) which is available in a consistent basis across the country, unless Highways England believe that there will be a very large number of empty dwellings in the district (a district where the target/growth strategy has increased very significantly compared to the previous development strategy), the issue of a large disparity between projected dwellings and projected households is one which should be revised.
- 4.6 In national policy, household projections are only stage one in the determination of the levels of housing development (whether as an Objectively Assessed Need (OAN) or in the standard methodology) and it would be unfortunate if the Government (MHCLG) and Local Planning Authorities were adopting a growth strategy for housing that was based on much higher levels of growth than the levels of growth the Government (DfT) and Highways England are using to plan for the supporting strategic infrastructure.
- 4.7 For the period up to 2042, Local Planning Authorities are being expected to deliver their housing need as set out in the standard methodology produced by MHCLG. This provides a consistent baseline, regardless of the actual status of the current Local Plan for all Local Planning Authorities in the area. Housing need in the standard methodology includes an affordability uplift which would result in a step-change increase to past population trends. Chelmsford and surrounding districts is one of the least affordable locations in the country.

## **Traffic modelling report for consultation**

- 4.8 Appendix A of the Traffic Modelling Report lists how the housing and employment developments were considered in the traffic model. In analysing the sites which are included across the five local planning authorities, we believe the methodology used to include or exclude is deeply inconsistent. The Council is concerned that the baseline data used for the 'base year model' 2016 is incorrect, for example residential sites which have progressed through the planning system have not been updated. Paragraph 4.5.3 states that developments which are not specifically modelled are instead accounted for by general background traffic applied at a local authority level. While we are unable to examine the modelling in detail, we believe it likely projects forward past traffic growth which could underestimate traffic levels as the Local Plan housing target in Braintree is a step change uplift on past trends.
- 4.9 This methodology followed has resulted in land south of Feering/west of the A12 and Towerlands which are strategic growth locations for 795 and 575 dwellings being omitted from the core scenario. Additionally, significant sites with planning permission over 50 (although this threshold does not appear to apply to some core scenario sites) in Cressing and Silver End are not listed which should be modelled. As Local Plans in all five local planning authorities are now either adopted or are close to adoption, we would prefer that Local Plan housing targets and allocated sites are used in addition to latest planning permissions and adjusted background traffic estimates only where appropriate.
- 4.10 Appendix 3 of the section 2 Local Plan is the latest position pertaining allocated sites up to July 2021 and additional sites coming forward as planning applications will need to be monitored carefully. The Council is happy to provide additional information to Highways England on this matter, in particular its most recent Local Plan housing trajectory which was recently updated.

## **Landscape and visual**

- 4.11 BDC supports the approach taken in the Landscape and Visual in chapter 8 of the PIER. Given the limited resources available and the lack of a PPA, unfortunately a landscape specialist was not available to respond to this consultation. As landscape resources are not available, our comments on Landscape and Visual Matters are more general.
- 4.12 The PIER states that landscape mitigation will be embedded into the scheme through a series of measures:
- (i) designing junctions to reduce effects on landform, retaining vegetation, field patterns and landforms
  - (ii) careful design of major structures, signage and gantries to limit visual intrusion,

- (iii) sensitive location of main road signs to limit visual intrusion within the landscape,
- (iv) use of sensitive lighting and
- (v) planting to reduce adverse landscape and visual effects including native hedgerow, shrub and tree planting.

4.13 At screening stage, the Council requested that maximum use of supporting visual information, such as plans, cross sections, aerial photography/drone footage and CGI imagery/‘fly throughs’ or ‘fly overs’ is employed by the applicant to assist all parties to comprehensively understand the landscape and visual impact of the proposal. We acknowledge that CGI flyovers have been deployed with viewpoints and cross sections to be published in the Environmental Statement. To help visualise the visual impact of the proposal, we request additional viewpoints from the western edge of Wood End Farm (post restoration of borrow pit BP-E) and the eastern edge of Land off Gleneagles Way at the southern end of POW 90\_40.

4.14 The Council supports the principle of using embedded mitigation and request that further visual tools are provided to assess the proposed mitigation work in the Environmental Statement. HE is reminded to have reference to BDC’s Settlement Fringes Capacity Study by The Landscape Partnership.

### **Arboricultural Comments**

4.15 At this stage of submission for consultation, the PIER provides an overview of what is desired in terms of arboricultural landscape features, impacts and mitigation, with greater detail yet to be submitted. The PIER recognises Jacobs as having carried out the assessments and surveys with regards to arboricultural matters and these finalised details are to be published within the Environmental Statement.

4.15. From an arboricultural perspective, the current design as relayed via the PIER will require large amounts of tree cover to be removed to achieve the physical requirements for extra lanes. However, the PIER also indicates substantial areas of planting in order to mitigate this effect, as well as acknowledging the potential monotonous views to be avoided by simply lining the new A12 with dense tree cover. This acknowledgement is appreciated, as well as the effort made to sculpt and improve the landscape with further planting.

4.16. Within the Baseline conditions, Landscape Constraints of the PIER, notable trees and woodlands are mentioned. Potential impacts, losses and/or mitigation for these constraints would like to be seen in detail with a suitable mitigation scheme (where necessary) within the Environmental Statement, (Chapter 8. Landscape and visual), alongside the Impact Assessment to be submitted.



## **Noise and Vibration, Air Quality and Geology and Soils**

- 4.17. Environmental Health has considered the information in Sections 6, 10 and 12 of the Preliminary Environmental Information Report (PEIR) and comments as follows.
- 4.18. Generally, there is a logical approach to the assessment process and sufficient detail presented to confirm the likely adverse effects. For air quality no exceedance of the air quality objective levels are predicted within the Braintree District as a result of the implementation of the proposed scheme. Further soil/ground gas investigations are to proceed where necessary to fully assess the contaminated land risks where there is possible contamination of soil. Construction noise will give rise to significant adverse effect at residential dwellings and Environmental Health would recommend that night time working should be avoided where significant adverse effect is predicted. Further information will become available as to the programme of the works to be reported in the Environmental Statement (ES) to further assess the impact of construction noise. Further detailed assessment of the road traffic noise will be carried out in the ES. Environmental Health would wish to see that where adverse noise effects are identified that the impact on living conditions is fully considered and mitigation is implemented to minimize noise levels.
- 4.19. Table 17.1 summarises the significant (residual) environmental effects predicted.

### **Air Quality is considered within section 6 of the PEIR.**

- 4.20. For air quality, the report concludes that there are no significant adverse effects on human health receptors determined as likely for both the construction and operation phases of the project. This is based on a comprehensive assessment of the incremental increases and decreases due to air pollutant sources (i.e. traffic/construction activity) against baseline levels.
- 4.21. For relevant receptor locations within the Braintree District area no exceedances of the air quality objective levels are predicted. The pollutants assessed are nitrogen dioxide and particulate matter.
- 4.22. This is a positive overall outcome of the preliminary air quality assessment. It is noted that given the realignment of the A12 in places, the widening of stretches of the road and introduction of new junctions at 21 and 24 that there will be beneficial and adverse effects where the air pollutant levels will decrease or increase against the future air quality which would otherwise exist if the project did not proceed, but increases are not determined as significant nor present an exceedance of air quality objective levels.

- 4.23. It is noted that more reliable input data, particularly for the construction phase, will become available as the project progresses to reduce the uncertainties of the model input data mentioned in 6.5.6 of the PEIR. The margin of error might be further considered in a sensitivity study to reduce the likelihood of under prediction where the air quality objective levels is close to exceedance at any relevant sensitive receptor locations.
- 4.24. It is noted that the report concludes that significant adverse effects are unlikely from the construction phase and a comprehensive construction management plan must be agreed and implemented to prevent and control air pollution.
- 4.25. Whilst Environmental Health would only consider human health effects, it is noted that the report also considers the potential for significant adverse effects on bio-diversity from nitrogen deposition.

#### **Geology and Soils is considered in section 10 of the PEIR**

- 4.26. The report concludes that no significant effects are identified during the operation stage. Significant adverse effects on soils from loss of agricultural land and likely significant effects on groundwater and surface waters from contamination are identified for the construction phase.
- 4.27. As Braintree District Council is the regulator for contaminated land within the district area, it supports the intention to carry out further investigation (including ground gas monitoring) particularly at the landfill area at Witham (vicinity of Whetmead nature reserve of Blackwater Lane in Witham) so that the construction methodology can be developed to prevent significant risk to end users including construction workers and buildings. It is further noted that there will be a strategy in the event of unexpected contamination during excavations and further assessment of the potential for contamination of groundwater alongside construction works. It is assumed that assessment of risks to groundwater will include liaison with the Environment Agency.

#### **Noise and Vibration is considered in section 12 of the PEIR**

- 4.28. Table 17.1 concludes that for the construction phase there are likely significant adverse effects on receptors in close proximity to the construction activities such as piling and demolition, construction of new junctions and bridges and night time working. For the operation phase there are likely significant adverse effects for approximately 63 residential dwellings and significant beneficial effects for approximately 225 residential dwellings. The number of dwellings is for the whole project area including areas of other neighbouring local authorities to Braintree.
- 4.29. As for the comments on air quality then a comprehensive construction management plan must be agreed and implemented to prevent and control



noise pollution during the construction phase. Using the DMRB LA11 significant adverse effect due to construction noise is deemed to occur when there is a moderate/major magnitude of impact and works for a duration exceeding 10 or more days or nights in one 15 consecutive day/night period or exceeding more 40 days in any 6 consecutive months.

- 4.30. It is likely that there will be significant noise impacting on sensitive receptors for a lesser time period than that used to define significant adverse effect. Noise of shorter duration may still present cause for complaint from occupiers of the affected dwellings and therefore, as previously stated, effective implementation of the construction management plan is key. Particular regard must be given to public liaison with the noise sensitive residential occupiers to reduce the likelihood of complaints to the local authority.
- 4.31. Where works are not offline to the existing A12 then road closure of the A12 will be necessary. This includes demolition of existing structures and construction of new structures for replacement bridges following widening. There will be static work for long periods between junctions 20a and 21 for bridge structures. Sensitive receptors are described as within 50m of the noise source (12.10.6) and there is reference to night time working.
- 4.32. Other works include diversion of utilities prior to the main works, preparation of the main compound and borrow pits and the construction of a new bridge and earthworks to realign the Braxted Road and the requirement for sheet piling and percussive piling.
- 4.33. Environmental Health would require that works resulting in significant adverse effect due to noise are avoided during the night time period.
- 4.34. It is accepted that as stated in section 12.10.4 that the exact schedule of work is still unknown and the ES, when submitted, will present more detail of the duration and therefore significance of construction activities described in the PEIR.
- 4.35. For the operational phase then there will be changes in road traffic noise level which presents significant beneficial effects and significant adverse effects and this is expected as the road is widened, new junctions introduced and the alignment of the A12 changes.
- 4.36. In reference to the noise monitoring locations, it is noted that in the main the locations are close to the existing A12 or the new alignment of the A12. This should allow source data to be provided for the purpose of the model and it is also noted that assessments are proposed close to junction 24 and the Braxted Road realignment, which will allow more detailed assessment of the increase in noise levels at the receptor positions where both construction and operation noise effects are predicted as significant. It is logical to adopt this approach to be able to enhance the conclusions of the quantitative

assessment within the PIER.

- 4.37. Where the PIER concludes that noise barriers may not offer value for money – e.g. south of A12 at Hatfield Peverel and at Dengie Farm House or where there is an increase in noise level due to operational noise, then it would also be appropriate to confirm that there is adequate baseline assessment at such locations and confirmation that the ability to achieve internal noise levels given in BS8233 Table 4 and the ability to control the thermal comfort within the relevant dwellings is not adversely affected more so than the 'do minimum' scenario.
- 4.38. Generally where the ES concludes that there is an increase and particularly a significant adverse effect at the operation stage of the project, then it is recommended that the assessment also considers whether the internal noise levels for habitable rooms as given in table 4 of BS8233 may still be achieved without further mitigation and whether acceptable external noise levels in private garden areas as given in BS8233 may still be achieved and where noise levels require that windows shall be closed the impact on the thermal comfort of the relevant receptors at the affected dwellings.

## **Population and Health**

- 4.39. Chapter 13 of the PIER was considered in this response on Population and Health, along with chapters 6 and 12 on noise and air quality.
- 4.40. After the transfer of public health duties from the NHS to Public Health England and local authorities, Braintree Council has a role to play in public health which is incorporated as an objective of the Council's corporate priorities. The Council has pledged to support its communities and build resilience by encouraging people to make positive lifestyle choices, increase physical and mental health and intervene early to support active lives.
- 4.41. Local planning authorities can help applicants understand the complex interactions that generate health effects and aid in the evaluation of their significance (e.g. local importance of issues and/or acceptability of change). We will ensure that any significant population and human health related effects that are likely to arise from the project have been appropriately considered. We must also make sure any mitigation required to avoid or reduce likely significant health effects arising from the project is sufficient to give confidence it will be effective.
- 4.42. As noted in 13.1.3 of the PIER, the health of an individual or community is determined by a complex interaction between a wide range of determinants, including lifestyle, behaviour, community, local economy and built/natural environment. Development will have an effect on many of these determinants of health which will contribute to the health and wellbeing of the community.

The assessment follows guidance in DMRB LA 112 which splits matters into Land Use and Accessibility or Human Health, and both are assessed for impacts during construction and operation.

- 4.43. The methodology proposed is consistent with good practice and the topics to be assessed are welcomed, these are:

#### Land use and accessibility

- Residential property and housing
- Community land and assets
- Development land and business
- Agricultural land holdings
- Walking, cycling and horseriding

#### Human Health

- Noise, air and other environmental pollutants
- Road traffic collisions
- Active travel
- Community severance and social networks
- Access to services, facilities and employment
- Physical and visual access to greenspace

- 4.44. It is noted that health inequalities will be assessed in the Environmental Statement.
- 4.45. The human health study area in the assessment as shown on figure 13.1 should include Nounsley, although the addition of this village is unlikely to affect overall outcomes. Communities are accounted for by ward (which is supported by the baseline statistical source at table 13.7) and then assessed by settlement - i.e. Hatfield Peverel, Witham, Rivenhall End, Kelvedon and Feering.
- 4.46. Generally, land use and accessibility is set out logically however human health is not easy to follow as many of the determinants in Table 13.3 are linked back to land use and accessibility sections. It would be useful to summarise the effects according to the determinants used in Table 13.3 in operational and construction impacts assessment. We would suggest assessment against health and wellbeing outcomes would also be a useful to aid understanding of the scheme (see Health Impact Assessment in Spatial Planning, PHE 2020). Identifying opportunities for enhancing health and wellbeing can also be a key outcome of the mitigation process.
- 4.47. For the baseline assessment, the housing allocations and planning applications used (Table 13.6) are inaccurately identified and the number of dwellings at each site needs updating. The table should reflect all planning applications granted permission or pending decision: Hatfield Peverel - 224,

Gleneagles Way - 100, Wood End Farm - 400, Land at Feering - 795, Land off Inworth Road, Feering – 40, and those likely to be granted planning permission. These residential allocations are not all spatially represented on Figure 13.1 (e.g. Land at Gleneagles Way).

- 4.48. Furthermore, the future baseline assessment utilises ONS 2018 household projections which leads to residential property and housing in the Braintree area accruing a Medium value and sensitivity. As explained elsewhere in this response, Highways England are under projecting household and population growth in the district. We believe population increase will be around 20% and the assessment should assign High value and sensitivity along with Chelmsford, Colchester and Maldon.
- 4.49. Impacts for each matter on both Land Use and Accessibility and Human Health are identified at a high level generally, thus lacking any geography or granularity such as identifying or cross referencing which properties are at risk of sleep disturbance (13.8.13). This also affects air pollution, community severance, commercial enterprises and active travel. There is a lack of geographical context in section 13.8 despite the baseline identifying many of the affected land uses. These issues should be picked up though the Environmental Statement.
- 4.50. The assessment also does not appear, by way of referencing the likely significant adverse effects in chapter 12 on noise, to take into account development likely to occur before first year of construction, i.e. in 2024 for example, is noise and air pollution impact on residents within new development at Land East of Gleneagles Way taken into account? We have similar concerns with the use of Strava heatmaps which provides data for land use now, but not at 2027. A measured adjustment should be made to the baseline data to account for planned changes.
- 4.51. Beyond box 6 on Greenspace and health, there is little in the methodology about mental health which, as well as access to greenspace, could be also be affected by access to other services, employment opportunities, noise and pollution. Our response on noise identified significant adverse effects on 63 properties where the mitigation proposed would not fully mitigate the impact, here there would be additional impacts on resident's physical and mental health as well. The population and health impact assessment refers back to noise and pollution mitigation which assesses the matter on a technical level without reference to human health. Mental health issues typically have a strong correlation in areas with lower social-economic resources and poor physical health outcomes but there isn't baseline in the PIER for mental health. There is not enough detail at paragraph 13.9.6 to show how engagement and participation proposed would fully or partially mitigate mental health issues during construction.

- 4.52. The report identifies are no human health, including mental health issues, identified in relation to employment. This is due to the position that the viability of businesses relying on passing trade will not require assessment which we consider to be unsatisfactory. The impacts on mental health on changes to employment due to a number of businesses relying on passing trade is therefore unaccounted.
- 4.53. We note that table 13.7 shows that Witham scores significantly poorly across a range of physical health measures. The Environmental Statement should also include socio-economic measures to show why Witham scores worse than its peers to further understand the matter. Any mitigation measures for inequality (to be included in the Environmental Statement), any legacy improvement funds and accessibility, should improve outcomes at this location. It is acknowledged that consultation with the local Director of Public Health will be undertaken.
- 4.54. Overall, measures to support active lifestyles though strategic priorities given to walking, cycling and horseriding and reducing severance is welcome. In correlation with existing communities and proposed developments, there should be a focus on severance issues at these geographical locations: between Hatfield Peverel and Witham at Junction 21, Maldon Road underpass to the south of Witham, Braxted Road, south of Rivenhall End, Inworth Road, Feering and Prested Hall, Feering.
- 4.55. Community severance as a result of alterations to traffic flow and induced demand does not appear to be identified, for example severance as a result of higher traffic flows would significantly adversely affect people living in Hatfield Peverel at the B1137 The Street/B1019 Maldon Road where the baseline already recognises traffic flows as relatively high. Two-way traffic (baseline is off-slip only) will likely adversely affect the Street east of the Duke of Wellington. Several PROW, which are correctly identified as mainly recreational routes, at Witham and Kelvedon and Feering are also important to residents maintaining an active lifestyle. Figure 13.3 appears to lack commentary regarding the WCH routes at J22.
- 4.56. Rivenhall End will see significant benefits but only with the right traffic calming and decommissioning scheme for the existing A12. Some properties to the south of Rivenhall End would experience a worsening of noise and air pollution but these mainly affect businesses.
- 4.57. Highways England will become an extensive landowner of areas adjacent to Hatfield Peverel, Witham, Rivenhall End and Feering following the A12 widening scheme. These land uses include areas for drainage attenuation, ecological and landscape mitigation plans within the DCO boundary. These areas would include directly adjacent land to existing settlements and planned developments at:

- West of Bury Lane, Hatfield Peverel
- East of Gleneagles Way, Hatfield Peverel
- West of Wood End Farm, Witham
- Land adjacent to Meadows, South East Witham
- Land at Inworth Road, Feering

4.58. In these areas, opportunities for improving access to semi natural and formal greenspace should be explored to contribute positively to physical and mental health. Circular routes for recreational use would contribute to encouraging a healthy, active lifestyle.

### **Population and Health Summary**

- 4.59. Based on the information provided, Braintree District Council does not consider that the PIERs provides sufficient information to make a full assessment on the environmental impact of the development on Population and Health.
- 4.60. Overall no concerns have been identified for environmental impacts at the population level and we broadly agree with this outcome. Some further detail on mental health impacts and reference to human health impacts on a settlement level is requested. We are also concerned that the use of ONS 2018 population projections will underestimate the resident population. This does not mean that the deficiencies cannot be rectified by the Environmental Statement and we expect that the issues raised in this response to be considered.
- 4.61. Minor Errata: 13.7.53 Chelmer Village is in Chelmsford, not Colchester

### **Climate Change**

- 4.62. Following assessment by Highways England, the project is not considered to represent an impediment to the government achieving its climate change obligations. Anticipated climate impacts have been identified and areas of further work to be undertaken are mentioned. These impacts include higher temperatures and dry ground conditions, increased heavy rain events with potential for flood risk have been among the main impacts identified.
- 4.63. It is important that construction is designed and engineered to cope with the extremes of wet and dry and associated ground movement, so that the need for maintenance is minimised. Similarly, surface materials must be able to remain usable at the high end of the temperature range.
- 4.64. The change to the vehicle mix using the road should be considered, as should any differing needs of users of new vehicle technology. Thus, design of



roadside infrastructure may need to be considered, including the following aspects which may be relevant:

- a. usage of electric vehicles during high temperatures can reduce their travel range. Will the existing frequency of laybys and emergency telephone facilities remain suitable?
  - b. Strandings in the increasingly hot temperatures may have more serious consequences as battery (or other) failure means no power to keep cool. The opposite applies for cold temperatures.
  - c. Grid capacity may play a part in whether motorists can reliably recharge for necessary journeys. Thus, there may be a need to consider if there is a need for roadside “shade” at stopping places, and for roadside charging facilities to be served from a “protected” electricity supply.
  - d. The Floodrisk Assessment, yet to be completed, must consider climate change impacts from all sources.
- 4.65. Impacts on groundwater contamination are particularly important where wells are used for domestic water supply. The likelihood of such impacts must be assessed and if possible, prevented. Where prevention is not possible adequate mitigation should be provided.

### **Cumulative Impact**

- 4.66. It is understood that the PIER has reached stage 3 of 4 and the cumulative impact assessment will be completed for the Environmental Statement. We agree that a return to stage 1 is necessary to include the identification of new planning permissions and other reasonably foreseeable development, and request that we can fact-check the cumulative impact assessment in draft Environmental Statement before submission into the DCO.

## **5. Walking, Cycling and Horseriding**

- 5.1 The Walking, Cycling and Horseriding (WCH) links with Population and Health where the provision of safe and direct routes can encourage sustainable travel and leisure routes can contribute positively to physical and mental health. Improving Cycle route provision is a particular focus in the District at present and the Council would wish to see full and detailed consideration given to this in the Environmental Statement and the scheme as a whole, alongside pedestrian and horse-riding routes.
- 5.2 The WCH route between Hatfield Peverel and Witham is very important for sustainable travel interactions between the two communities. Increasing interactions will be driven by new residential developments of circa 1,000 dwellings with planning permission or under construction in the area. New

residents should have access to the rail station at Hatfield Peverel and primary school and shops at Gershwin Boulevard. These interactions are particularly acute due to a lack of capacity at Hatfield Peverel primary school and lack of secondary school facilities, which will produce additional sustainable travel interactions between the two settlements.

- 5.3 To facilitate sustainable travel, WCH access should remain open during construction at daytime in particular, and routes which are direct, legible and safe (lit during winter months) should be maintained.
- 5.4 We note that the development will result in the closure or significant re-routing of footpath 29 and 15, and the closure of Burrows Creep. Further detail is required to determine if these are acceptable.

## **6. Detrunking the A12**

- 6.1 The Council understands that one of the questions in the consultation seeks views on the plans for existing road and local roads once the offline A12 sections are constructed. BDC currently cannot form a firm opinion on this matter which inherently requires substantial detailed work to be undertaken first, including on highways modelling, consideration of public transport and active travel modes, potential environmental improvements and discussions with local residents, Parish Councils and the Local Highway Authority.
- 6.2 The detrunked routes and new junctions would greatly increase vehicular capacity on the local road network but should be designed so as not to be attractive routes for through traffic. A comprehensive plan for these detrunked roads should be developed rather than any piecemeal approach in partnership with all relevant stakeholders. Considering the importance of co-ordinating detrunking with a strategic vision for land use at communities in Witham, Rivenhall End and Feering, our preference would be to establish a legacy fund to be drawn on for detrunking at a later date. We will work closely with ECC and HE to comprehensively plan sustainable communities.

## **7. Next Steps**

BDC welcomes this consultation and have responded as above, with a summary of our main issues provided at section 3, we hope the issues raised will be addressed before the forthcoming Environmental Statement and DCO application. We remain supportive of the A12 widening scheme in principle and look forward to working with the applicant to develop the scheme. If we can assist with refining the population and planning applications data held by HE, or assist with any other aspect of the PIERS, please do get in contact.



Cllr Gabrielle Spray  
Cabinet Member for Planning and Infrastructure  
On behalf of Braintree District Council

Our ref: Policy

Sustainable Development

Your ref:

Causeway House  
Braintree

Ask for: Mr Gary Sung

Essex CM7 9HB

Dial: 01376 552525

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Date: Thursday, 16 December 2021

[www.braintree.gov.uk](http://www.braintree.gov.uk)

Via email only

[A12chelmsfordA120wide@highwaysengland.co.uk](mailto:A12chelmsfordA120wide@highwaysengland.co.uk)

Dear Mr Hussain

**RE: A12 widening consultation response letter – supplementary consultation**

This letter is Braintree District Council's initial response to the A12 Chelmsford to A120 Widening Supplementary Design Consultation which took place in November 2021.

Thank you for inviting the Council to comment due to a lack of time to appoint various environmental specialists resources, this is a limited response to this consultation. As discussed during PPA engagement with National Highways in November and December 2021, we'd like to request additional time to appoint specialist environmental consultants and to provide feedback on the technical details in January as necessary. In the specialist areas of Noise and Vibration and Air Pollution, we can only provide a holding response at this time.

There is a new, focussed consultation within which there are 5 identified alterations to the proposals affecting the District:

- Switching from the southern link road to the northern link road, i.e. provision of vehicular access to J21 via Wellington Bridge instead of The Street at Hatfield Peverel.
- Removal of proposed noise barriers at Hatfield Peverel and replacement with improved road surfacing with better performing noise surfacing.

- Alterations to the access to/from J21 - Witham so that it follows existing slips.
- A proposed alteration to the Gas pipeline diversions with options assessment provided for routes around the south of Witham.
- Temporary removal of noise barrier at Market Lane at Witham during construction.

The following comments are supplementary to the A12 Chelmsford to A120 Widening Preliminary Design Consultation June 2021. Where we have commented on design elements which as a result of the supplementary consultation is no longer planned, such as the southern link at Hatfield Peverel, our comments are withdrawn.

### **Junction 21 - Hatfield Peverel**

Taking a strategic view of the alterations to route traffic via Wellington Bridge, we would broadly support this change subject to the detail of the environmental impact studies. This is a reasonable change that responds to our noise and vibration, air pollution and human mental and physical health concerns raised in the previous Statutory Consultation (July 2021). We reserve the right to make additional comments on the technical environmental impacts of the new route.

We concur and support the County Council's comments in Section 2 (Junction 21 – southern link road removal (Hatfield Peverel)) of their response to this consultation. In particular, we concur with the aspirations of the County and Maldon District to provide relief to Maldon Road. We reiterate concern that congestion at the Duke of Wellington roundabout is further exacerbated by induced traffic from the A12 and that local highways solutions would have an urbanising effect on the character of the village. We acknowledge that further ongoing engagement is taking place regarding this issue.

### **Noise barriers at Hatfield Peverel**

Due to limited time to appoint specialist resources, we can only issue a holding response on noise and sound performance of this supplementary alteration to the scheme and reserve the right to make further additional comments. We otherwise concur with the County at Section 3 of their response.

### **Alterations to access to Witham**

This is not a point advertised in the supplementary consultation however we noted the change to red-line boundary in the preliminary design book for land use plans.

Earlier versions of the red-line boundary had coincided with Section 2 Local Plan Strategic (housing) Allocation Site HATF316, which had the effect of sterilising the land. While the site has remained allocated, the changes to Section 2 Local Plan implemented has moved the Development Boundary north to follow the DCO boundary. Given the stage of the Local Plan at examination, we are unlikely to make further alterations to reverse these changes of our own accord – the Inspectors however may take a different view. For the future of HATF316, the redrawing of the Development Boundary and construction of new housing, with suitable air, noise and landscape mitigation provided by the developer, is the likely outcome to this change.

National Highways should acknowledge and proceed a scheme which is compatible with this outcome.

### **Gas pipeline**

No comment at this moment. We would like to reserve our views on this aspect of the scheme following the submission of appropriate survey/study work.

### **Market Lane Noise Barrier**

Due to limited time to appoint specialist resources, we only issue a holding response on the temporary removal of the barrier at Market Lane and reserve the right to make further additional comments. We otherwise concur with the County at Section 5 of their response.

Braintree District Council looks forward to working with National Highways to develop the scheme as it progresses to DCO submission in 2022. Regrettably we have been unable to comment on the supplementary consultation as far as we would like and have had to issue a holding response on a number of technical areas. Thank you for your understanding.

Yours Sincerely

Cllr Gabrielle Spray

Cabinet Member for Planning and Infrastructure

On behalf of Braintree District Council

28th August 2022

Planning Policy  
Causeway House Braintree  
Essex CM7 9HB



By email only

Dear Ms Allen,

**Planning Act 2008 (as amended) – Section 55 Application by National Highways for an Order Granting Development Consent for the A12 Chelmsford to A120 Widening Scheme Adequacy of consultation request**

Thank you for contacting Braintree District Council (the Council) in regard to this application for a Development Consent Order (DCO).

The Council is a statutory consultee as one of the local authorities for the purposes of Section 43(1) of the Act. The Council's view is that the applicant, National Highways, has met the legal requirements of sections 42, 47 and 48 of the Planning Act 2008 and this should not impede the acceptance of the application for DCO under Section 55.

Section 42 pertains to the duty to consult, Section 47 pertains to the duty to consult the local community (preparation of the statement of community consultation) and section 48 pertains to the duty to publicise.

The Council can confirm that it was contacted by the applicant to comment on the Statement of Community Consultation (SoCC) whilst it was being prepared. This included an initial discussion during a workshop meeting in November 2020 and follow up meeting, including a presentation. A statutory consultation on the draft SoCC was held between the 29th January and 1st March 2021. The Council provided feedback comments before the 28 day time limit, on the 25th February 2021, and these were taken into account. The SoCC was published on the 22nd June 2021.

The Council is also satisfied that the duty to publicise at Section 48 has been met as the proposed DCO application was issued to The Essex Chronicle, Braintree and Witham Times and the Essex County Standard which provide print news coverage in the local area.

**Other Concerns**

While the Council finds no issues with the applicant complying with the duties of the Planning Act 2008, it would like to express its concerns about the sharing of information in regard to a number of areas of concern that Braintree District Council

and the highways authority Essex County Council continue to have regarding the scheme

Since the statutory consultation, significant engagement between National Highways, Essex County Council and other stakeholders on the project has taken place. Additional data has been shared with the main parties and draft versions of some DCO submissions documents have also been shared. Whilst we recognise and thank National Highways for sharing extra documentation this has taken some time and showed that additional work had been carried out by National Highways which had not been fully explained.

As it is not a highway authority, the District Council does not have specific transport specialists in house and has been reliant on its relationship with Essex County Council and its specialists to consider the very detailed and specialist nature of some of the work which has been produced and provides updates on its contents and implications. We understand that it has been necessary for Essex County Council officers to have detailed conversations with the National Highways team to understand that information. However this level of engagement has not been possible for most other consultees and therefore this raises the concern that changes to scheme impacts since the consultations won't be readily understood by stakeholders that have not had the same level of dialogue with National Highways.

We know that some of the concerns outlined above are shared with other stakeholders and resident groups with particular interests in the scheme, not least concerns around the time it has taken National Highways to provide information requested, the lack of reasoning provided for changes to datasets and the way in which some of the information has been presented.

We would note that as expected for a scheme of this scale, there are numerous examples of where National Highways have made changes to the proposed scheme since the first non-statutory consultation was undertaken in 2017 and in many cases these changes have been in response to feedback received. These changes are set out in section 7.4 of the Consultation Report.

The fact that changes have been made as a result of consultation is of course welcomed, and Braintree District Council supports many of the changes made. We do consider however that in some cases the changes proposed do not go far enough to address the issue in question, and moreover we believe that in most cases the changes made are relatively minor in nature and National Highways have to date not agreed to any of the more substantive changes that have been requested by stakeholders including Braintree District Council. This similarly applies to the detail of some proposals like detrunking which have arisen later in the process and views on which have been sought briefly, but no major changes implemented. There is a concern that National Highways have opted not to address legitimate concerns held by stakeholders on aspects of the scheme that are most in need of change whether it be because of cost, need for additional land-take or impact on programme. If this DCO application is accepted then Braintree District Council will of course continue to put forward its views on changes which it considers necessary to make the impacts of the scheme on local networks, environments and the community acceptable.

We will continue to work with National Highways and others on preparing Statements of Common Ground and we hope that some of the outstanding issues may be resolved prior to the conclusion of the DCO process.

**Yours Sincerely**

A solid black rectangular box used to redact the signature of the councillor.

**Councillor G Spray  
Cabinet Member for Planning and Infrastructure  
Braintree District Council**

Philip Davie  
Project Director, A12 Widening Project  
National Highways

Sent by email

Essex County Council  
County Hall  
Market Road  
Chelmsford  
Essex  
CM1 1QH

Date: 31 October 2022

## **A12 CHELMSFORD TO A120 WIDENING SCHEME – UPDATE ON ESSEX COUNTY COUNCIL’S POSITION ON THE PROJECT**

Dear Phil,

Thank you for your letter of 4<sup>th</sup> July 2022 which responds to the letter and requirements document sent by Andrew Cook on behalf of Essex County Council (ECC) on 1<sup>st</sup> April 2022. Your letter provided a useful update on National Highways’ position on various aspects of the project.

As you will be aware we have had a lot of dialogue on the A12 widening project over the past few months, not least through the Statement of Common Ground (SOCG) working group that has been established, and it follows that the County Council’s position on the project has developed and continues to evolve in response to information that has been set out in the DCO application, undertakings that have been made by National Highways (NH) and changes that have been proposed to various aspects of the scheme. Having engaged with ECC Members and representatives from district and parish councils affected by the project, we are now able to update you on our position on a number of the points raised in your letter. It is our intention to ensure that this position is reflected in our joint SOCG and within the Local Impact Report that we will be submitting to the DCO examination as a host authority for the scheme.

It is worth repeating that the County Council remains a strong supporter of the scheme overall, in recognition of the improvements it will bring to the A12 corridor between Junction 19 and Junction 25 and the wider benefits that are expected. We also welcome the engagement you have undertaken with us on the project which has enabled us to develop a much better understanding of the scheme and its anticipated impacts. We do however continue to have significant concerns about some aspects of the scheme and we continue to believe that material changes to the proposals are required to ensure the adverse effects are minimised and mitigated as far as possible, particularly on the local highway network for which ECC is the highway authority.



Given the project is now at pre-examination stage and parties are preparing for the upcoming examination, rather than respond to all the points raised in your letter of 4<sup>th</sup> July this letter seeks to summarise key issues that ECC considers remain outstanding. There are other issues on which we wish to continue engagement but the issues set out below are where we believe we should focus our attention in the period up to the examination.

### **Additional detail to be provided**

We welcome the additional information that has been provided to us since our last letter. We are continuing to review the DCO application documents; as you will appreciate there is a lot of information contained within the application, so we would be grateful for your ongoing support in signposting where specific information can be found. Clearly in reviewing the DCO application and other information that has been provided we will continue to have questions, and hence will continue to request clarifications or more detail on certain points as necessary. We are happy to use the shared actions tracker as a means of documenting where we believe further information is needed going forward.

### **Junction 19**

In our response to the statutory consultation ECC opposed the current design of Junction 19 partly on the grounds that the arrangement was not demonstrably compatible with wider development proposals in the vicinity of the junction, including the longer-term plan to dual the proposed Chelmsford North East Bypass (CNEB). While we appreciate that the dualling of the bypass is not committed we do believe it is required to support the growth planned in the area, and as such ECC is concerned that at this stage we simply don't know what works would be required to the junction to accommodate this in future. We believe that a joint study is required to better understand the compatibility of Junction 19 with wider development proposals in the vicinity of the junction, including CNEB, and would appreciate commitment from NH to this given that NH is actively developing the design for this junction. To be clear, we are not asking NH to amend the design of the junction but to work with us to ensure we can collectively understand what further changes may be required to the junction in the future – post completion of the A12 widening project – and how these could be delivered.

### **Boreham and the B1137, including Junctions 20a and 20b**

While the reasoning provided for the removal of Junctions 20a and 20b is understood, one of the consequences of this is a significant increase in forecast traffic flow on the B1137 and this naturally represents an area of concern for the local community and ECC. Fundamentally, while we support the proposed speed limit reduction on the B1137 through Boreham to 30mph we do not believe that a reduction in the speed limit alone will be sufficient, and we consider that a package of measures is required to discourage strategic traffic from routeing through Boreham to access Junction 19. These measures could include new pedestrian crossings, village entry treatments and potentially speed cameras, and a commitment to delivering suitable measures is required from NH.

As we have stated previously we do not currently support the proposed speed limit reduction on the stretch of the B1137 between Boreham and Hatfield Peverel, because the nature of this road is such that we think compliance with a 40mph speed limit is likely to be an issue. We believe that a 60mph and 50mph speed limit along this stretch of the B1137 should both be modelled so that we can better understand the impacts.

## **Junction 21**

We have reviewed the assessment NH have provided on the impacts of the scheme on B1137 The Street / B1019 Maldon Road (Duke of Wellington junction). Whilst we appreciate that the assessment indicates the scheme will not materially worsen the performance of this junction, we believe the new junction (coupled with the closure of Junctions 20a and 20b) will attract more traffic and are not convinced that the modelling is accurately reflecting current and future congestion on the network and it may, therefore, be underrepresenting the impacts.

The Duke of Wellington junction currently operates close to or above capacity at peak times, and the performance of the junction is expected to deteriorate as demand increases in the future. The arrangement of Junction 21 is such that all traffic from Hatfield Peverel will route to/from the A12 via the Duke of Wellington junction, and we believe there is a need for a Maldon Road bypass in future to accommodate forecast growth and ensure local communities can fully benefit from the A12 widening project. We welcome the planned widening of the verge platform at the on-slips to enable the slip roads to be more easily widened in the future to accommodate a future bypass, however in practice widening of these on-slips at a later date will still represent a significant, disruptive and costly endeavour that will represent a major challenge to delivering a bypass.

Our ask of NH on Junction 21 is twofold. Firstly we believe there is a good case for NH providing widened on-slips at the junction from the outset, to ensure a future bypass could be constructed off-line and with minimal disruption to the SRN, and request that NH amend the design of Junction 21 accordingly. Secondly, we want to build on the feasibility work that ECC and NH have undertaken to date to the point of jointly identifying the preferred option for a bypass. We are currently scoping this work and would like a commitment from NH to contribute towards the cost of this work and to providing technical design input on the connectivity with Junction 21.

## **De-trunking**

In our view the issue on which ECC and NH remain furthest apart is on the approach to the sections of the existing A12 which will be de-trunked and transferred to ECC as local highway authority to operate and maintain. We are disappointed that there has been little movement on this and put bluntly continue to believe that the approach to the de-trunked sections put forward by NH is unacceptable and represents a significant missed opportunity.

Since April we have looked at options for the de-trunked sections, drawing on best practice and examples from elsewhere. Based on this we believe the most pragmatic solution is to retain one side of the dual carriageway as highway (likely to be the current southbound carriageway) and to repurpose the other side with green infrastructure

and provision for pedestrians and cyclists. We believe there are many benefits to this, not least of which is the opportunity for the project to increase green infrastructure in support of the Government and ECC's ambitions for net zero, biodiversity and flood control. This approach also presents options to simplify the proposed junctions which may provide some cost savings which in turn could go some way towards offsetting the costs of repurposing one of the carriageways. We strongly urge NH to work with us and other stakeholders to develop the options and build on the initial work we have undertaken.

I would add that information on the condition of the assets which NH are proposing will be transferred to ECC is still required. This has been requested since March and the continued absence of this data is affecting our ability to form a full and informed view on de-trunking.

## **Junction 24**

ECC retains concerns about the proposals for Junction 24 in their current form; in particular we believe that further design development of the proposed new Inworth Road roundabout is required, additional measures are required to help ensure the B1023 is able to safely accommodate the expected increase in traffic and measures are required to reduce the potential for rat-running on local roads.

On the first point, based on the review we have undertaken on the proposed new Inworth Road roundabout to date we have identified several potential design issues such as the proposed design speed and the tie ins with the approach roads including Kelvedon Road. Furthermore, it is unclear currently how existing accesses to Inworth Road in the vicinity of the roundabout will be maintained or how cyclists are expected to navigate the roundabout. It is not clear what optioneering has been undertaken in arriving at the current design and we believe further design development is required to provide assurance that the roundabout will operate safely and satisfactorily and ultimately be suitable for its intended purpose. This should include providing clarity on the horizontal alignment and forward visibility on the approaches to the roundabout.

On the second point, while we welcome the proposals to widen pinch points on the B1023 to a minimum carriageway width of 6.1m there are several pinch points which are not currently proposed to be widened. We believe this approach is inconsistent and that the scope of these localised widening works should include the pinch points south of the garden centre, to the junction with the B1022 and Hinds Bridge, to the north of the A12. A knock-on effect of widening pinch points on the route may be that vehicle speeds increase and for this reason measures for encouraging compliance with the proposed speed limits may be necessary. In any case, we believe further walking and cycling improvements should be included in the proposals to offset the impacts of increased traffic on this route.

Finally, we are currently in the process of scoping a range of measures that we think could help to reduce the likelihood of vehicles rat-running on local roads and particularly through the village of Messing to access the new junction. We will share details of these measures shortly and would welcome a commitment from NH to funding their implementation.

We are grateful for the work that has been undertaken to consider the case for a bypass of Inworth Road as a means of addressing some of the concerns held about the junction arrangement. Having reviewed this work we largely concur with NH's assessment that while the alternative proposal for a bypass of the B1023 put forward by the local community would have some benefits including reduced traffic through Messing, it would increase the attractiveness of the junction and lead to increased traffic overall and through Tiptree.

### **Walking, cycling and horse-riding**

We welcome the improvements that have been made to walking and cycling infrastructure, including the changes that have been made to the northern side of Paynes Lane overbridge. Notwithstanding this, we believe that further enhancement to the proposed walking, cycling and horseriding infrastructure is appropriate at numerous locations, in line with best practice (LTN1/20).

The walking and cycling matrix that NH have produced is welcomed. In some cases further justification for why LTN1/20 cannot be achieved is required. Confirmation is also required of the proposed arrangements for and impacts of the new pedestrian and cycling crossings. We will revert with detailed comments on the matrix shortly.

As a general point, wherever possible provision should also be made for horse riders.

### **Monitoring and mitigation**

There are some locations on the local highway network that are particularly sensitive to changes in traffic flows and patterns, whether that be because they are already operating close to or above capacity or because the scheme is expected to have a significant impact on traffic flows and/or network performance. Given current levels of uncertainty we believe that NH should commit to monitoring the actual impacts of the scheme in operation for an agreed period after opening and reporting the data collected, at a small number of locations to be agreed (likely to include the B1137 through Boreham, the Duke of Wellington Junction and the B1023). It could be that this monitoring can be utilised as part of a wider benefits management exercise and/or post-opening project evaluation that will be undertaken by NH.

Importantly, if this monitoring were to indicate that the scheme was having a material, unanticipated adverse impact on the local highway network we believe NH should commit to working with ECC to investigate, develop and implement suitable mitigation. While we appreciate that any such commitment would need to be clearly defined, there are precedents for such approaches and this would go some way towards providing ECC and stakeholders with assurance that in the event the scheme does have significant adverse impacts on the network these would be identified and, if necessary, addressed. We believe this should be secured via a DCO requirement and would like to discuss how this could work with your team.

### **Construction impacts**

We recognise that the construction impacts of this scheme will be significant, and we share your desire to minimise and mitigate these impacts as far as possible and

ensure local communities and users of the A12 are kept informed about the works. To that end we are largely supportive of the approach set out in the Outline Construction Traffic Management Plan, and welcome NH's commitment to continue engaging closely with us on the development of the Construction Traffic Management Plan. One area we would like clarity on is the proposed speed limits on the A12 during the works, as we believe this could have a significant impact on the use of local roads as an alternative.

## **Conclusion**

In conclusion this response provides a summary of the key outstanding issues on the project where we believe we should focus our engagement over the coming weeks. ECC remains supportive of the project, and our intention is to ensure that the benefits of the scheme to Essex are maximised and we collectively minimise the adverse effects on the local network as far as possible. We look forward to continued close working on the project in the run up to the DCO examination.

Yours sincerely,



Billy Parr  
Head of Network Development, Essex County Council

<b>Report Title: Local Development Scheme</b>	
<b>Report to: Local Plan Sub-Committee</b>	
<b>Date: 24th November 2022</b>	<b>For: Decision</b>
<b>Key Decision: No</b>	<b>Decision Planner Ref No:</b>
<b>Report Presented by: Alan Massow</b>	
<b>Enquiries to: <a href="mailto:alan.massow@braintree.gov.uk">alan.massow@braintree.gov.uk</a></b>	

## **1. Purpose of the Report**

1.1. The Local Development Scheme (LDS) is a project management document which sets out the planning documents which the Council will produce and the timetable for their production. A copy of the revised LDS is attached at Appendix 1.

## **2. Recommendations**

2.1 It is recommended that the revised Local Development Scheme 2022 is approved by the Local Plan Sub-Committee.

## **3. Summary of Issues**

3.1 The Planning and Compulsory Purchase Act 2004 requires the Council to prepare a Local Development Scheme (LDS) and keep it up to date. The main purpose of the LDS is to set out the rolling programme for the preparation of planning documents that will form Braintree Council's Development Plan and planning guidance. It identifies the key stages and timescales in the preparation of planning documents. This will provide the public and other relevant stakeholders with information on what documents are being produced and the predicted timescales involved. The proposed updated LDS will cover the period from 2022 to 2024.

3.2 The LDS is split into a number of different sections. The first section sets out the current national, regional and local planning policy context relevant to Braintree District. The second part of the document provides the timetable for the preparation of planning documents as well as an update on neighbourhood planning activities within the district. This is followed by an updated list of key evidence base documents which support the Braintree Development Plan. The final section of the document provides information monitoring and reviewing as well as resources required, and an analysis of the risks involved.

3.3 It is important to keep the LDS up to date to provide accurate information to stakeholders using the document as well as meeting legislative requirements. The previous version of the LDS was published in May 2021. Since then, the Section 2 Local Plan was adopted in July 2021.

### ***Changes to the previous Local Development Scheme***

3.4 The main changes to the LDS are;

- The adoption of the Section 2 Local Plan.
- An update on Neighbourhood Development Plans, including Kelvedon and Feering.
- An update to the timetables and subjects proposed as Supplementary Planning Documents

## **4 Next Steps**

4.1 If approved, the LDS (Appendix 1) will replace the version published in May 2021.

## **5 Options**

5.1 An alternative option would be to not approve the updated LDS and continue to use the previous May 2021 version. However, this would result in stakeholders being less well informed on changes to the Development Plan, evidence base and other relevant information.

## **6 Financial Implications**

6.1 The cost of development plan preparation is being met from the base budget.

## **7 Legal Implications**

7.1 The Planning and Compulsory Purchase Act 2004 requires the Council to prepare a Local Development Scheme (LDS) and keep it up to date. Accordingly, the recommendation set out within this report ensure that the Council are meeting its statutory obligations.

## **8 Other Implications**

8.1 There are no other implications arising from the noting of this report.

## **9 Equality and Diversity Implications**

9.1 Section 149 of the Equality Act 2010 creates the public sector equality duty which requires that when the Council makes decisions it must have regard to the need to:

- a) Eliminate unlawful discrimination, harassment and victimisation and other behaviour prohibited by the Act



- b) Advance equality of opportunity between people who share a protected characteristic and those who do not
- c) Foster good relations between people who share a protected characteristic and those who do not including tackling prejudice and promoting understanding.

9.2 The protected characteristics are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, gender and sexual orientation. The Act states that 'marriage and civil partnership' is not a relevant protected characteristic for (b) or (c) although it is relevant for (a).

9.3 An Equality Impact Assessment was undertaken on the Draft Local Plan in 2017 which indicated that the Plan will not have a disproportionately adverse impact on any people with a particular characteristic. A further Equality Impact Assessment has been prepared on the final Plan which again indicates that the Plan will not have a disproportionately adverse impact on any people with a particular characteristic. This is attached as Appendix 5 to this report

## **10 Background Papers**

*National Planning Policy Framework 2021 (NPPF)*

*Local Development Scheme May 2021*

## **11 List of Appendices**

Appendix 1 – Local Development Scheme 2022 – 2024 (November 2022).





# LOCAL PLAN | LOCAL DEVELOPMENT SCHEME

2022 - 2024

November 2022

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# 1. Introduction

- 1.1 The Local Development Scheme (LDS) sets out the timetable for preparing documents to be included in the Local Plan. The Local Plan is a collections of documents which make up the statutory development plan for the Local Planning Authority (LPA). These include Development Plan Documents such as the Local Plan itself and Supplementary Planning documents which support and provide additional background for Local Plan policies.
- 1.2 It also sets out what resources will be required in order to ensure that the work will be completed in accordance with the timetable and identifies the risks that could result in delay.
- 1.3 The first LDS was published in September 2005 and the last review was published in May 2021. Progress on the Local Development Scheme has been monitored and the extent to which the milestones identified have been achieved is set out in the Council's Annual Monitoring Reports.
- 1.4 The Braintree Local Development Scheme is therefore a project management document, which informs the public and stakeholders of the planning documents that the Council will produce and the timescale for their production. It includes;
  - A timetable for the production and adoption for all Development Plan Documents and Supplementary Planning Documents within the Local Development Scheme time period (2 years).
  - Identifying background studies and documents, which form the evidence base for the Local Plan.
  - A list of current adopted Supplementary Planning Documents, Material Planning Guidance and Development Briefs.
  - Arrangements for monitoring and review.

## 2. Planning Context

### National Planning Guidance

- 2.1 The National Planning Policy Framework (July 2021) *'sets out the Government's planning policies for England and how these should be applied. It provides a framework within which locally-prepared plans for housing and other development can be produced.'* Regarding plan-making, paragraph 15 of the framework describes how *'the planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings'.*

### County Planning Policy

- 2.2 Essex County Council is the authority responsible for production of the Waste and Minerals Local Plans, which form part of the Development Plan. At present the adopted plan for Essex is;
- The Essex Minerals Local Plan (2014) (currently under review)
  - Essex and Southend-on-Sea Waste Local Plan (2017)
- 2.3 More details on the waste and minerals development document can be found on the Essex County Council website [www.essex.gov.uk](http://www.essex.gov.uk) following the links from planning to minerals and waste policy.

### Adopted Local Planning Policy

- 2.4 The Development Plan for Braintree District is made up of the Local Plan 2013-2033 (Section 1 and Section 2). The Braintree District Local Plan Section 1 was adopted in February 2021 and Section 2 was adopted in July 2022.

## 3. Local Plan

3.1 The Local Plan sets out how the Council plans for, and makes decisions about, the future of towns, villages and countryside and will set out a strategy for the future development of the District, which is based on a clear and locally distinct vision. This vision was developed with the involvement of the local community and there should be commitment by all relevant agencies to its delivery. The Local Plan has to be reviewed every five years.

3.2 The Local Plan consists of several documents, including Development Plan Documents (DPDs) such as the Local Plan, Supplementary Planning Documents (SPDs), a Local Development Scheme (LDS), the Authorities Monitoring Report (AMR) and a Statement of Community Involvement (SCI). Further details about each document and their progress in Braintree District are given as follows:-

### 3.3 The Statement of Community Involvement (SCI)

3.4 **Purpose:** This document sets out the standards and approach to involving the community and stakeholders in the production of the Local Plan.

3.5 **Status:** A SCI is in place.

### 3.6 Local Plan

3.7 **Purpose:** Sets out strategic and non-strategic allocations for land use, and policies for the determination of planning applications.

3.8 **Status:** Section 1 and Section 2 of the Local Plan are adopted (February 2021 and July 2022, respectively).

### 3.9 The Authority Monitoring Report (AMR)

3.10 **Purpose:** To set out the principal characteristics of the District and assess progress in preparing Local Development Documents and monitor progress in housing, employment and other development.

3.11 **Status:** The AMR is published in December of each year and assesses the year from the 1<sup>st</sup> of April to the 31<sup>st</sup> of March. The latest report is available on the council's website.

### 3.12 Local Development Scheme (LDS)

3.13 **Purpose:** A project management document to inform stakeholders of the timetable for production of documents.

3.14 **Status:** This LDS will replace the May 2021 document.

### 3.15 Supplementary Planning Documents (SPDs) and Development Plan Documents (DPD)

3.16 These are supplementary to the Local Development Documents. Further detail is set out in Section 4.

### 3.17 Community Infrastructure Levy (CIL) Charging Schedule

- 3.18 **Purpose:** To set out the standard levy which the local authority will be applying to some developments and to define the infrastructure projects, which it is intended to fund.
- 3.19 **Status:** Braintree District Council will consider implementation of the Community Infrastructure Levy if it considers it the best approach to gather developer contributions from new development.

### 3.20 Local Plan – Timetable for Review

Role and Content	Sets out the detailed allocations of land for housing, employment, retail and other major land uses. Sets out strategic and non-strategic development management policies.
Status	Development Plan Document
Chain of Conformity	Must be consistent with National Policy as set out in the National Planning Policy Framework.
Geographic Coverage	Whole of Braintree District

Timetables and Milestones	
Local Plan Review Start	2024
Review Complete	July 2027
Arrangements for Production	
Lead Department	Braintree District Council Sustainable Development
Management Arrangements	To be managed by Departmental Management Team and Sub Committee of Council Members
Resources	To be prepared by Planning Policy Team involving other services as appropriate. To be funded from base budgets.
Involvement of Stakeholders and Community	As set out in the Statement of Community Involvement
Post Production Monitoring and Review Mechanisms	Document to be monitored on an annual basis and will need to be subject to review, if monitoring highlights a need, or as required.

## 4. Supplementary and Development Plan Documents

- 4.1 Supplementary Planning Documents (SPD's) and other guidance documents can provide further detail on particular policies or local issues. SPD's can take a number of forms, but can normally be broken down into 2 categories;
- Area based including masterplans and development briefs, which deal with specific parcels of land; and
  - Topic based which provide additional information on local issues, or policies, such as design guides.
- 4.2 Although supplementary documents are not subject to examination, they are produced in consultation with the community and other interested parties and are still subject to regulations regarding their consultations. Supplementary documents are not required to be listed within the Local Development Scheme, but it is considered appropriate to inform the public of the Council's proposals to produce new documents.
- 4.3 The Council also has a number of approved planning guidance documents and development briefs. These are documents, which have been either produced or consulted upon by another authority, or whilst the public and stakeholders have been involved in their production have not undergone the same strict levels of consultation as is required for an SPD.
- 4.4 A list of the current adopted SPD's, guidance and development briefs are included in the table below;

Title and Subject	Produced by	Status	Date Approved
<b>Essex Coast Recreational Disturbance Avoidance &amp; Mitigation Strategy (RAMS) SPD.</b> It sets out the mitigation that is necessary to protect the wildlife of the Essex coast from the increased visitor pressure associated with new residential development, and how this mitigation will be funded.	Essex County Council, Braintree District Council and other Local Authorities	SPD	May 2020
<b>Affordable Housing.</b> The document sets out the process and mechanisms for the delivery of affordable housing in Braintree District.	Braintree District Council	SPD	May 2006
<b>External Artificial Lighting.</b> It provides advice and guidance on what factors the Council will take into account when determining planning applications.	Braintree District Council	SPD	September 2009
<b>Open Space.</b> The document sets out the processes and mechanisms for the delivery of open space in Braintree District	Braintree District Council	SPD	Updated in 2014



Title and Subject	Produced by	Status	Date Approved
<b>Parking Standards – Design and Good Practice</b> Guidance Provides car and cycle parking standards together with design guidance on accommodating parking within various types of residential and commercial development.	Essex County Council working in partnership with Essex Planning Officers Association.	Guidance	Nov-09
<b>Urban Place Supplement.</b> To build on the Essex Design Guide to provide guidance on producing high quality, attractive developments which are sustainable and reflect the local area. (Braintree District Council did not adopt sections 5.8, 6.2, 7.0, 7.1, 7.2 and 7.3 of the document)	Essex County Council in partnership with Essex Planning Officers Association, East of England Development Agency, Environment Agency and Inspire East	Guidance	Jun-07
<b>Essex Design Guide 2005</b> Provides guidance on design and layout principles including specific information relating to structure and layout of new developments, garden sizes, building design and form, parking design and road layouts.	Essex County Council working in partnership with Essex Planning Officers Association	Guidance	2005
<b>Land East of the High Street, Halstead</b> Guide to development and regeneration on a site in Halstead	Built Environment Branch of Essex County Council commissioned by Braintree District Council	Development Brief	Jan-05
<b>Riskstones Neighbourhood Centre, Witham</b>	Braintree District Council	Development Brief	Sep-10
<b>Silver End Shops Site</b> Guide to development and regeneration on a site in Silver End village.	Stephen Claydon and Michael Munt approved by Braintree District Council	Development Brief	Jun-06

- 4.5 The Council intends to review and update the 3-topic based SPD's (Affordable Housing, Design (Including External Lighting) and Open Space) following the adoption of the new Local Plan. The level of review will vary from document to document.
- 4.6 The Council is also considering several additional Supplementary Planning Documents and a Development Plan Document, to provide extra guidance in key areas such as on Climate Change, Renewable Energy Locations, and Bio-diversity Net Gain. However, in some cases the Council is waiting for new/additional guidance and policy which is expected from central government shortly. The table below lists all proposed SPD's and an indicative timetable for their production

## Supplementary Planning Document and Development Planning Document – Timetable

Title and Subject	Produced by	Status	Estimated Date of Approval
<b>Climate Change</b> Document supporting the implementation of Local Plan policies to help mitigate the impacts of climate change, and to address any updates in national policy which have occurred since the adoption of the Local Plan.	Braintree District Council	SPD	May 2024
<b>Affordable Housing.</b> The document sets out the process and mechanisms for the delivery of affordable housing in Braintree District.	Braintree District Council	SPD	December 2023
<b>Design SPD (incorporated External Lighting, Householder and Shop Front Design Guide).</b>	Braintree District Council	SPD	January 2024
<b>Open Space.</b> The document sets out the processes and mechanisms for the delivery of open space in Braintree District	Braintree District Council	SPD	June 2024
<b>Waste SPD</b> Advice on the provision, type and funding for domestic waste provision.	Braintree District Council	SPD	December 2023
<b>Infrastructure/Planning Obligations s106</b> To provide information on what type of infrastructure and contributions should be sought from planning permissions.	Braintree District Council	SPD	June 2024
<b>Bio-diversity Net gain</b> This document seeks to set out the requirements of bio-diversity net gain and to instruct developers as to use the bio-diversity net gain matrix and what they should provide and how it is justified.	Braintree District Council possibly working with other stakeholders	SPD	June 2024
<b>Parking Standards</b> To provide car and cycle parking standards for a range of uses and locations. Include best practice design and layout	EPOA/ Braintree District Council	SPD	September 2023
<b>Renewable Energy Locations DPD *</b> To provide advice and guidance on suitable locations within the district for renewable energy generation.	Braintree District Council	DPD	March 2024

\*At present the Local Plan sets out that this will need to be a DPD as current government policy only allows for wind turbine locations to be set out within an DPD. However government has indicated it may be reviewing this policy and therefore an SPD might be able to be produced on the same topic which would be a quicker option.

## 5. Neighbourhood Planning

- 5.1 The Localism Act 2011 introduced neighbourhood developments plans which help communities with or without Parish or Town Councils to establish general planning policies for the development and use of land in a neighbourhood. Once 'made', these plans will form part of the statutory development plan for the area and will be used in the determination of planning applications.
- 5.2 The first stage of developing a neighbourhood plan is to designate a neighbourhood area. The district has agreed 16 Neighbourhood Areas. Other parish councils are considering developing a neighbourhood plan.
- 5.3 Once a neighbourhood area has been agreed preparation of a neighbourhood plan can be carried out by a parish or town council or in the case of unparished areas a neighbourhood forum.
- 5.4 The table below sets out the stage of each of the Neighbourhood Plans which are underway in the District. For more information or for copies of the Neighbourhood Plans listed please visit the website. [About Neighbourhood Plans – Neighbourhood planning – Braintree District Council](#)

Area	Stage
Bradwell & Pattiswick	'Made' – 22 <sup>nd</sup> July 2019
Bures & Bures St Mary	Pre-Regulation 14
Coggeshall	"Made" – 21 <sup>st</sup> July 2021
Cressing	'Made' 17 <sup>th</sup> February 2020
Earls Colne	Preparation of draft plan
Feering	Adoption anticipated December 2022
Hatfield Peverel	'Made' – 16 <sup>th</sup> December 2019
Kelvedon	"Made" July 2022
Gosfield	Pre-Regulation 14
Great Bardfield	Pre-Regulation 14
Gt Saling & Bardfield Saling	"Made" – October 2021
Great Yeldham	Pre-Regulation 14
Stisted	Pre-Regulation 14
Steeple Bumpstead	Pre-Regulation 14
Toppesfield	Pre-Regulation 14
Witham	Pre-Regulation 14

## 6. Evidence Base

- 6.1 The Development Plan Documents will establish the Council's planning policies. In preparing these documents and to ensure that the proposals and policies contained within them are soundly based, several specialist studies and other research projects have been or will be undertaken.
- 6.2 The following table illustrates key reports and studies that will be used to provide a robust and credible evidence base for the Local Development Framework. This list will be added to if additional work is required.

Name	Description	Date
<b>General</b>		
Authority Monitoring Report	The monitoring report aims to assess progress in meeting policy targets and milestones, and to present information on housing trajectories demonstrating the delivery of the provision of new homes	The document covers the period 1 <sup>st</sup> of April to the 31 <sup>st</sup> of March each year.
<b>Economic</b>		
Braintree District Retail Study 2015 (Reviewed 2018)	An update to the previous retail study to enable robust and up to date evidence supping retail boundaries, allocations and policies in the new Local Plan.	Update 2015 and reviewed 2018.
Braintree Plan for Growth 2017-2022	The prospectus sets out how the council intends to create the conditions for economic growth and deliver a prosperous Braintree District from 2017 to 2022.	Approved 2017 New strategy expected 2023.
Employment Land Needs Assessment 2015	The assessment considers projected Employment Land Needs	August 2015
Rural Services Survey	The survey updates previous work done in 2005 to assess the provision of services within rural parishes.	Completed in September 2008
<b>Environmental</b>		
Braintree Green Spaces Strategy	Builds on the results of the 2006 Open Space Audit to set standards for the quality, quantity and accessibility of open space together with specific needs, surpluses or deficiencies.	Completed in 2011.
Conservation Area Appraisals & Management Plans	A programme of conservation area appraisals has been undertaken. The process provides further detail about the character of the areas as an update to the original conservation area designations.	2009 onwards.
Dedham Vale – Proposed Search Area for AONB Review	The map shows the current Dedham Vale AONB and the maximum potential extension proposed.	Ongoing.
Habitats Regulation	The report is to identify any effects the proposed development in this District will	2017

Name	Description	Date
Assessment and Appropriate Assessment	have on European Sites of Importance for nature conservation and to suggest ways to mitigate this impact.	
Heritage Assets Impact Assessment	Heritage Assets impact Assessment for Potential Growth Locations within Braintree District	2016
Historic Environment Characterisation Project	Report characterising the historic environment of the district	2010
Mid Essex Strategic Flood Risk Assessment	The document identifies in more detail areas of existing or proposed development which are at risk from flooding	Completed October 2007. Review completed in 2017.
Open Spaces Sport Recreation Strategy (Playing Pitch Strategy)	The open space strategy will set out the Council's strategy with regards to open space including the strategy for the Sports, Leisure and Recreation	Completed 2017. Update to commence 2022 for 2024 completion.
Protected Lanes Study	Commissioned by Braintree District to assess the protected lanes in the district. An additional study was commissioned by Cressing Parish Council in 2015 for lanes within that parish.	2013 – Main Report 2015 – Cressing Parish Report.
Strategic Environmental Assessment and Sustainability Appraisal	Makes an environmental and sustainability appraisal of each document to report on likely impacts of the proposed policies and plans.	Completed 2017. Updated in 2021 to reflect adoption of section 1 Plan and in 2022 for the section 2 plan.
Strategic Flood Risk Assessment	An assessment of the flood risk within the district.	November 2016.
Water Cycle Study Update	An assessment of water availability in the District to support new homes	March 2017.
<b>Residential</b>		
Affordable Housing Viability Study	Assesses whether the proposed affordable housing policies are viable and achievable in terms of dwelling threshold and percentage of affordable housing that is required by development	Completed in 2009. Review completed 2015.
Brownfield Land Register	The Brownfield Land Register provides a list of brownfield site which are suitable for housing- led development.	Annually.
Demographic projections 2013-2037 Phase 7 Main Report May 2015. Demographic projections 2013-2037 Phase 7 Macro Areas accompanying profiles.	Considers the Demographic projections for 2013 to 2037	May 2015

Name	Description	Date
Essex Wide Gypsy and Traveller Accommodation Needs Assessment	An Essex wide study commissioned by the Essex Planning Officers Association to provide information on the appropriate number of Gypsy and Traveller pitches to be provided.	Complete July 2014. A review is underway.
Gypsy and Traveller and Travelling Showpersons Accommodation Assessment	An Essex wide study commissioned by the Essex Planning Officers Association to provide information on the appropriate number of Gypsy and Traveller pitches to be provided.	Complete May 2017. A further study on transit pitches in progress.
Objectively Assessed Housing Need Study	Commissioned by Braintree, Chelmsford, Colchester and Tendring. Determines the Housing Market Area and OAN.	Completed July 2015. Further update 2016 completed.
Strategic Housing Land Availability Assessment (SHLAA) 2016	This document builds on work completed in the Urban Capacity Study but includes an assessment of a sites viability and likely timescale for the site to be developed.	Ongoing process.
Housing Delivery Test	The Housing Delivery Test is an annual measurement of housing delivery in the area of relevant plan-making authorities (Non-metropolitan districts, metropolitan boroughs, London boroughs and development corporations with plan-making and decision making powers), National Planning Policy Framework paragraphs 74 and 76 set out the policy consequences of not meeting the Housing Delivery Test.	Annual
Standard Methodology	The standard methodology uses a formula to identify the minimum number of homes expected to be planned for, in a way which addresses projected household growth and historic under-supply.	Updated every 2 years to take into account official population and household projections.
Self-build and custom housebuilding Register	The Council keep a register of people who are interested in building self-build or custom build homes within the Braintree District	Ongoing.
<b>Transport and Infrastructure</b>		
Community Halls Consultation Report March 2016	Report on the consultation undertaken for Braintree District Council with community halls in Braintree, Halstead and Witham	March 2016.
Cycling Strategy	Strategy for cycling in Essex	Essex – Completed November 2017. Braintree 2021.
Development Boundaries Review Methodology	Proposes a methodology and a series of criteria that will be used in reviewing the development boundaries for the settlements in the District for the emerging Local Plan.	June 2015.

Name	Description	Date
Highways and Transport Assessment	Identifies key issues with the highways and transportation network, in order to determine capacity and any improvement required to transport networks.	Completed 2017.
Infrastructure Plan	A study of key infrastructure capacity, constraints and future improvements.	June 2017
Local Transport Plan – Essex County Council	Published by Essex County Council	2011
Parking Standards	The document sets out the required standards for the District	2009
Viability Assessments	This document will seek to demonstrate that the Local Plan is viable	Completed 2017.

- 6.3 In addition an Equality Impact Assessment was undertaken as part of the production of the Local Plan to ensure that all policies and documents are free from discrimination and promote equality of opportunity.
- 6.4 A full list of up-to-date evidence base documents can be found via the Planning Policy webpage link: <https://www.braintree.gov.uk/planning-building-control/local-plan-2033/2>
- 6.5 The Local Plan must also have regard to a number of other strategies and policies produced both by the Council and by partners. These include;
- Braintree District Climate Change Strategy and Action Plan 2021 March 2023 (A draft Climate Emergency Initial Action Plan September 2021 to March 2023)
  - Braintree Plan For Growth 2017 – 2022 (Replacement due March)
  - Essex Biodiversity Action Plan 2011
  - Essex Local Transport Plan 2011
  - Essex Minerals Local Plan 2014
  - Essex and Southend-on-Sea Waste Local Plan 2017

# 7. Monitoring and Review

## Monitoring

- 7.1 The LDS and the development plan documents that it includes will be monitored on an annual basis, in the Monitoring Report with a reporting period of 1st April – 31st March.
- 7.2 Each year the report will set out;
- How the Council is performing against the timescales set out within the previous year's Local Development Scheme.
  - Provide information on housing and employment completions and land availability.
  - Provides a housing trajectory and shows the Council's 5 year supply of housing land.
  - Any required update to the Local Development Scheme as appropriate.
- 7.3 The Local Plan programme will be managed through the Sustainable Development Service reporting to the Cabinet Member for Planning and Infrastructure and the Local Plan Sub-Committee. This will include considering progress on the preparation of Local Development Documents and identifying action to be taken if there are variations from the project programme.

## Review

- 7.4 Following the initial adoption of each Local Plan as set out in the Local Development Scheme, it is anticipated that any subsequent reviews will be in the form of a rolling programme. Reviews may also be necessary as a result of changes in national guidance, as an outcome of the monitoring in the Monitoring Report, or pressures for development or regeneration.



## 8. Resources and Risk

### Resources

- 8.1 The Local Plan process is led by the Planning Policy team, part of the Sustainable Development Service at Braintree District Council.
- 8.2 The timetable contained within this document is based on using the full resources of the Planning Policy team at the Council, which consists of a team manager who will be responsible for the overall project, planning policy officers, technical and administration staff.
- 8.3 Additional resources, particularly to provide specialist input on various technical matters will be sought from time to time as required from other teams within the Council including Housing Policy and Economic Development, and other organisations including Essex County Council and National Highways . In addition, external consultants may be commissioned to develop elements of the evidence base, or supplementary planning documents.

### Risk

- 8.4 There are several factors which may impact on the achievement of this timetable. The table below considers and deals with the main risks.

Issue	Level of Risk	Impact and Mitigation
Delays to the production of background studies	Medium	Would delay the preparation of supplementary planning documents. The resources for any further studies should be in place to ensure they are commissioned at an early stage
Changes to national guidance in relation to Braintree. The new NPPF was published July 2021. The Government is currently consulting on changes to planning policy and guidance	Medium	Could delay the preparation of supplementary planning documents or require an early review of those documents already produced. Review the timetable for the preparation and review of documents within the Annual Monitoring Report and review of the LDS if necessary.
Supporting Neighbourhood Planning	Medium	Staff time and other resources being diverted to support neighbourhood planning. Resource and timetable planning with neighbourhood plan groups needed.
Problems or difficulties engaging with stakeholders and the community	Low	May delay the preparation of development plan documents. Ensure stakeholders and the community are involved at an early stage of the process, as outlined in the Statement of Community Involvement. Lack of agreement with other Local Authorities regarding the duty to co-operates. Need to maintain a close working relationship with neighbouring authorities.

Inability of the Planning Inspectorate to deliver hearings/ reports to the timetable.	Medium	Would delay the adoption of development plan documents. Agree early with the Planning Inspectorate that the timetable laid out for each document is acceptable. If slippage occurs this should be identified in the Monitoring Report and amendments made to the timetable.
Insufficient staff resources due to staff turnover or volume of work greater than anticipated	Medium	Would delay the production of supplementary planning documents . Consider use of consultants if financial resources allow. Revise timetable for the production of documents through the Monitoring Report and review of the LDS if necessary
Government New Homes Bonus, neighbourhood planning funds insufficient or no longer available.	Medium	Would delay the production of evidence base and supplementary planning documents which need specialist advice from consultants. Increased budget bids may need to be made if Government New Homes Bonus or neighbourhood planning funds are insufficient or no longer available. Revise timetable for the preparation of documents through the annual monitoring report and review of the LDS if necessary.