

# DRAFT

(on Council headed paper once approved)

APPENDIX 3

A12 Chelmsford to A120 Widening Project Team  
Highways England  
Woodlands  
Manton Lane  
Bedford  
MK41 7LW

Add date:

Your Ref: TR010060/S42(1)(b)/June/2021

Dear Sir / Madam

**A12 Chelmsford to A120 Widening Scheme ('the Project')**  
**'Preliminary Design' Statutory Consultation 22 June 2021 – 16 August 2021**  
**Planning Act 2008 Section 42: Duty to consult on a proposed application**

Maldon District Council (MDC) Members and Officers have attended all engagement sessions leading up to this 'Preliminary Design' Statutory Consultation, including technical workshops on junction design and connections to and from the A12 on the local roads network, PEIR (Preliminary Environmental Information Report) workshops, DCO and SoCC (Development Consent Order and Statement of Community Consultation) workshops and Member Forums between March 2020 and May 2021.

Concerns on certain aspects of the 'design' have been continually raised through the engagement sessions and Member Forums relating mainly to the local road network connections to the Project from within the Maldon District. The central, north and west parts of the Maldon District rely on the A414, B1018, B1019, B1022 and B1023 local road networks to connect to the A12 via Danbury on A414 to Junction 19 Chelmsford, via B1018 to Witham to Junction 22 (via B1389), via Little Braxted Lane to Junction 22, via Hatfield Peverel on B1019 Maldon Road to Junctions 20a and 20b and via Tiptree and Kelvedon on the B1022 and B1023 to Junctions 23 and 24. These existing junctions will be changed by the Project. We acknowledge the local road network is managed by Essex County Council (ECC) Highways and Transportation and not Highways England.

After the 'Preferred Route' stage, based on 'route 2', and before any 'design options' were presented, Officers informed the A12 Team, when they presented at MDC offices on 11 March 2020, that our strategic housing growth (South Maldon Garden Suburb and North Heybridge Garden Suburb) and economic regeneration at The Causeway, (Maldon District's largest employment area) rely and impact on the B1019 Maldon Road connection via Hatfield Peverel to connect to the A12. It was felt, at that early stage, that the design of the Project plus investment opportunities could be taken forward by Highways England, working with ECC Highways and Transportation, MDC and cross-boundary with Braintree District Council (DC), to improve known congestion issues at the B1019 Maldon Road / Duke of Wellington mini-roundabout in the centre of Hatfield Peverel 'village' that access / exit A12 Junctions 20a and 20b. These known congestion issues at the Maldon Road/Duke of Wellington mini roundabout to access and exit the A12 for Maldon District residents and businesses were confirmed by ECC Highways and Transportation at the 11 May 2021 'A12 Workshop – Junctions 19-25 (including local roads)', as being of some 30 years standing.

At the same meeting, MDC re-emphasised the status of Little Braxted Lane in the context of the 'design options' presented for Junction 22, that Little Braxted Lane is a 'single lane route with passing places' to access and exit the A12 from Little Braxted, Great Braxted, Great Totham and Wickham Bishops.

# DRAFT

(on Council headed paper once approved)

APPENDIX 3

The Council makes the following comments to the Statutory Consultation with reference to: **A12 Chelmsford to A120 Widening, Public Consultation, Highways England, June 2021 'Consultation Brochure' and virtual exhibition material**

## **THE CLOSURE OF JUNCTIONS 20A AND 20B AND REPLACEMENT OF NEW JUNCTION 21 SERVING ALL LOCAL CONNECTIONS INCLUDING WITHAM, HATFIELD PEVEREL AND MALDON**

### **Maldon District Council response:**

The Council raises an objection to the preliminary design of new Junction 21. Junction 21 does not address the significant and long-standing congestion issues at the B1019 Maldon Rd/B1137 Duke of Wellington mini roundabout in Hatfield Peverel that currently access / exit junctions 20a and 20b (to be removed as part of the Project). Maldon District residents and businesses access / exit the A12 national road network from the B1019 Maldon Rd / B1137 Duke of Wellington mini roundabout. Whilst the B1019 Maldon Rd / B1137 Duke of Wellington mini roundabout falls within the local road network, it is the only way of accessing and exiting the A12 national road network.

The Council questions the logic and cost of '*a road linking the southern roundabout [of Junction 21] to Hatfield Peverel [the B1019 Maldon Rd / B1137 Duke of Wellington mini roundabout], intended as the main access between the proposed new road layout and areas to the south and west, including Hatfield Peverel and Maldon*' to a known and existing traffic congestion hot spot accessing and exiting the A12 (see diagram on page 14, Consultation Brochure).

The Council has continually raised the issue of traffic congestion in Hatfield Peverel village originating from the Maldon District at the B1019 Maldon Rd / Duke of Wellington mini roundabout. Maldon Road, Hatfield Peverel is a residential street with housing on both sides of the road with village services and facilities including 2 pubs, nursery school and a parade of shops including convenience store and dry cleaners. Access to the village primary and junior schools are off Maldon Road on Church Street.

The Council is perturbed at the lack of consideration in the Project given to investing in and improving a known congestion hotspot on the local road network originating from Maldon District residents and businesses accessing the nearest A12 national road network on the B1019 Maldon Road via Hatfield Peverel. This is in stark contrast to the consideration given by the Project to reducing the congestion in Kelvedon High Street (within Braintree District) by closing Junction 23 and with a new Junction 24 to link from the Inworth Road (B1023) to relieve Inworth (a small village) of traffic coming from Tiptree on the B1023 (within Colchester Borough).

### **Reasoning for the Council's response:**

Hatfield Peverel Junctions 20a and 20b are the nearest junctions to access the A12 national road network from the 'Main Settlements' of Maldon and Heybridge ('Main' settlements are classified in Policy S8 *Settlement Boundaries and the Countryside*, Maldon District Local Development Plan adopted July 2017 (LDP). Maldon and Heybridge, as main settlements, have significant housing growth and regeneration projects identified in the LDP in two new Garden Suburbs: South Maldon Garden Suburb (1,428 new dwellings) and North Heybridge Garden Suburb (1,383 new dwellings) and to create 2000 new jobs in the District by 2029. The Maldon and Heybridge Central Area Masterplan Supplementary Planning Document (SPD) identifies the District's largest employment area at The Causeway, Heybridge as the focus for regeneration and investment to bring forward employment led regeneration where good transport links to the national road network are vital. Both Garden Suburbs are under construction. The North Heybridge Garden Suburb is located adjacent the **B1019** to Hatfield

# DRAFT

(on Council headed paper once approved)

APPENDIX 3

Peverel and the South Maldon Garden Suburb is located adjacent the **A414** to Chelmsford via Danbury. This information was passed to the A12 Team in March 2020.

The existing Maldon District residents and businesses (and visitors) have a high reliance on the motor vehicle and local road network to access the A12 national road network (see paragraph 2, page 1).

The Maldon District has a high level of out commuting by motor vehicle and commercial/business traffic (HGVs (Heavy Goods Vehicles), LGVs (Large Goods Vehicles)) that connect to the A12 national road network via Hatfield Peverel Junctions 20a and 20b from Maldon and Heybridge. Hatfield Peverel is also the nearest connection for Maldon and Heybridge residents to the access the national rail network at Hatfield Peverel Railway Station on the Great Eastern Mainline.

The Consultation Brochure, page 4 acknowledges the significance of the Project as: *'The A12 road is an important economic link in Essex and across the east of England. It provides the main south-west/north-east route through Essex and Suffolk, connecting Ipswich to London and to the M25.'*

*'The section between Chelmsford and Colchester carries high volumes of traffic, with up to 90,000 vehicles every day. HGVs are between 9% and 12% of the traffic on this section...and is an important commuter route.'* These facts in the Consultation Brochure are evidenced in Census, Office for National Statistics (ONS) data and resident / business surveys for the Maldon District and underpins our response that a high proportion of 'A12 traffic' originates from within the Maldon District via the local road network to connect to the A12 via B1019 Maldon Road via Hatfield Peverel.

At an early stage in the design process, Officers asked Highways England if the mini roundabout at B1019 Maldon Road / B1137 (The Street), Hatfield Peverel has the capacity to cope with existing traffic (HGVs, vans, cars) to and from the Maldon District to connect to the A12 Junctions 20a and 20b at the centre of Hatfield Peverel village. The recent 'made' Hatfield Peverel Neighbourhood Plan highlights the issue of *'high traffic flows on Maldon Road and The Street that are both narrow roads.'* Hatfield Peverel is a small village and B1019 Maldon Road is a residential street that carries heavy traffic (HGVs, LGVs and cars) to and from the main settlements in the Maldon District: Maldon and Heybridge.

Page 12 of the Consultation Brochure: *'The proposed scheme design'* paragraph 2 states:

*Our new junction 21 will provide access to the A12 both northbound and southbound and will take traffic from all directions between Hatfield Peverel Village and Witham.'*

There is no mention of Maldon or Heybridge? J21 will *'take traffic'* from Maldon and Heybridge via the local road network B1019 that will access the A12 Junction 21 from the Maldon Road / Duke of Wellington mini roundabout in the centre of Hatfield Peverel village.

Page 14 of the Consultation Brochure: *New Junction 21 (between Hatfield Peverel and Witham)*, bullet point 1 states:

*'A road linking the southern roundabout of the junction [21] to Hatfield Peverel, intended as the main access between the proposed new road layout and areas to the south and west, including Hatfield Peverel and Maldon.'*

Page 29, Traffic, Consultation Brochure states: *'we have used traffic surveys and analysed traffic data over a large area covering the roads between Chelmsford, Colchester, Braintree,*

# DRAFT

(on Council headed paper once approved)

## APPENDIX 3

*Maldon and beyond to create traffic models'....' to understand how drivers may respond to changes in road layouts'. The Consultation Brochure goes on to state: 'if you close a junction then it is likely that fewer drivers will continue to use the road which lead to that junction'*

The Council does not support this assumption in the case of the B1019 Maldon Road / B1137 Duke of Wellington mini roundabout as the route to the new Junction 21 is not changing i.e. Maldon District residents and businesses access and exit the A12 national road network via B1019 Maldon Road / B1137 Duke of Wellington mini roundabout on the local road network to the existing Junctions 20a and 20b (both junctions closing as part of the Project) and will access and exit the new Junction 21 by the same local road network at the mini roundabout but link to the new southern arm of the new Junction 21 that continues to link to the B1019 Maldon Road / B1137 Duke of Wellington mini roundabout in the centre of Hatfield Peverel village. There are no alternative routes to the new Junction 21 on the local road network for Maldon and Heybridge residents and businesses other than the B1019 Maldon Road / B1137 Duke of Wellington mini roundabout!

The Consultation Brochure, pages 30-33 evidences '*current and future congestion [on the A12] if nothing is done*. With reference to the junctions 20a and 20b, most of this 'traffic' originates from the Maldon District accessing and exiting the A12 at Hatfield Peverel via Maldon Road on the B1019 / Duke of Wellington mini-roundabout junction. Unfortunately, the diagram does not acknowledge that Maldon and Heybridge in the Maldon District exist as main settlements on the local road network, despite being considered as a destination / origin to and from the A12 national road network in the design of Junction 21. This is an unacceptable omission in the Consultation Brochure considering the input Maldon District Council officers and Members have given to the Project.

The diagrams on pages 30 and 31 present the current AM peak and PM peak at existing Junctions 20 and 20b at '*85% close to or beyond capacity*'. It must be acknowledged that the current congestion on the A12 at junctions 20a and 20b originates from the Maldon District. This is because Hatfield Peverel has a population of approx. 4,000 and Maldon and Heybridge have a combined population of approx. 23,000 plus the Maldon District's largest employment area at The Causeway, Heybridge carrying significant business and commercial traffic through Hatfield Peverel to access the A12 junctions at 20a and 20b. The known congestion at the Maldon Road B1019 / Duke of Wellington mini roundabout will continue as part of the Project.

The diagrams on pages 32 and 33 present the predicted congestion on the road in 2042 without the scheme [the Project]. For the reasons set out above, the main settlements in the Maldon District that access and exist the A12 national road network from local roads must be represented on the diagram and that the B1019 Maldon / B1137 is the only access and exit point to the new Junction 21?

During the engagement and technical workshops to finalise the 'preliminary design', Highways England '*investigated possible improvements at the Maldon Road / Duke of Wellington mini roundabout*' to access the new Junction 21 in acknowledgement of existing congestion, air quality and safety concerns at the Maldon Road / Duke of Wellington mini-roundabout (HGVs, LGVs, Cars etc.) and presented these at technical workshops:

- '*signalised T-Junction arrangement*;
- '*two lane approaches for 30m / 50m stacking capacity*';
- '*two lanes for The Street approach from J21 with 30m stacking capacity*';

# DRAFT

(on Council headed paper once approved)

- *one lane approach from Hatfield Peverel and Maldon Road approaches; and*
- *signalised T-Junction arrangement with banned turning movements’.*

It remained unclear what improvements to the existing Maldon Road / Duke of Wellington mini roundabout would be taken forward to public consultation and who would be responsible for delivery, ECC or Highways England? These ‘improvements’ still resulted in a Level of Service (LOS) F grading at the Maldon Road / Duke of Wellington mini-roundabout junction to access the A12. Is it appropriate to urbanise a small rural village with such significant traffic management ‘improvements’?

The Consultation Brochure, pages 36-39 set out the ‘traffic model’ predicting two-way traffic flows AM and PM when the Project opens *‘taking into account predicted housing and economic growth between now and when the scheme opens’.*

The southern arm of the new Junction 21 will see an increase in traffic [Point 4] from 466 to 1117 AM and from 409 to 1102 PM an increase in traffic of 140% and 169% respectively. This increase in traffic will be funnelled via the B1019 Maldon Road/Duke of Wellington mini roundabout.

Maldon Road, Hatfield Peverel [Point 5] on the approach to Maldon Road / Duke of Wellington mini roundabout traffic flow will not change significantly from 984 to 1005 AM and 1079 to 1093 PM. As detailed above, there will be no alternative route to Junction 21 but this predicted two-way traffic flow data does acknowledge that a significant flow of traffic originates from the Maldon District to Hatfield Peverel to access the A12 at the B1019 Maldon Road / Duke of Wellington mini roundabout.

ECC, Braintree District Council and MDC continued to press for a sensible, timely and appropriate solution to design Junction 21 and combat the significant congestion issues at the B1019 Maldon Road / Duke of Wellington mini roundabout to access the A12 from Hatfield Peverel village. Highways England stated at the workshop on 11 May 2021: *‘the design of the new junction 21 will not preclude a future ‘Maldon link road/Hatfield Peverel bypass’.*

The Consultation Brochure, page 41 states: *‘Due to projected growth in the area, the junction with The Street and Maldon Road may struggle to work adequately in the future’.*

## **JUNCTION 22 (COLEMAN’S BRIDGE)**

### **Maldon District Council Response:**

The Council objects to the design of Junction 22 in consideration of access to and from the A12 within the Maldon District via Little Braxted Lane which is a single lane route with passing places and single lane bridge crossing (Grade II Listed). Little Braxted Lane is suitable for cars and small vans only and not HGVs. The Project should consider improvements to the local road network.

### **Reasoning for the Council’s response:**

Maldon District residents and businesses in Little Braxted, Great Braxted and Wickham Bishops access and exit the A12 national road network via Little Braxted Lane.

The route to Junction 22 is not changing i.e. Maldon District residents and businesses access and exit the A12 national road network via Little Braxted Lane on the local road

# DRAFT

(on Council headed paper once approved)

APPENDIX 3

network. There are no alternative routes to Junction 22 on the local road network for these residents and businesses.

The Consultation Brochure, pages 30-33 evidences '*current and future congestion [on the A12] if nothing is done*'. With reference to Junctions 22, the diagram does not acknowledge that Little Braxted Lane exists as the only route for Maldon District residents and businesses to access and exit the A12 road network despite being considered as a destination / origin to and from the A12 national road network in the design of Junction 22. This is an unacceptable omission in the Consultation Brochure considering the input Maldon District Council officers and Members have given to the Project.

The diagrams on pages 30 and 31 present the current AM peak and PM peak at existing Junction 22 at '*85% close to or beyond capacity / 71% - 85% nearing capacity*'. It must be acknowledged that the current congestion on the A12 at Junction 22 originates from the Maldon District.

The diagrams on pages 32 and 33 present the predicted congestion on the road in 2042 without the scheme [the Project] at '*85% close to or beyond capacity*'.

The Consultation Brochure, pages 36-39 set out the 'traffic model' predicting two-way traffic flows AM and PM when the Project opens '*taking into account predicted housing and economic growth between now and when the scheme opens*'.

Little Braxted Lane [Point 2] will see an increase in traffic from 180 to 249 AM and from 134 to 370 PM, an increase in traffic of 38% and 176% respectively.

The Consultation Brochure, page 41 states: '*The proposed new Junction 22 provides a direct access to Little Braxted Lane and in the future, it is expected that traffic will increase on Little Braxted Lane*'.

The Council considers improvements are needed now to the local road network to accommodate the Project and not as an afterthought. See below.

**Junctions 23 (Kelvedon South Interchange) and Junction 24 (Kelvedon North) Kelvedon/Feering: the removal of junctions to the north and south of the villages and these and Tiptree served with a new junction off the Inworth Road. Also, the potential for a future junction to serve the RIS 3 scheme for the A120**

The Council questions the Project to relieve the impact of Tiptree traffic through Kelvedon High Street and Feering with a new junction off the Inworth Road to Hatfield Peverel needing a Maldon link road / Hatfield Peverel bypass from the new proposed Junction 21.

The Project should relieve the impact of Maldon and Heybridge traffic impacting on the Maldon Road / Duke of Wellington mini roundabout in the centre of Hatfield Peverel village and improve connectivity for Maldon District residents and businesses to the national road network.

**Local Growth proposals**

The Council is reviewing its LDP that commenced March 2021 – 2023 and published a 'Call for Sites' consultation that ran to 21 May 2021 to allocate potential sites in a new LDP. The ECC / MDC LDP Review Liaison Group will be meeting regularly every 6 - 8 weeks from 19 May 2021 to discuss transportation and highway matters associated with existing and future local growth proposals.

# DRAFT

(on Council headed paper once approved)

APPENDIX 3

## **Sustainable Transport**

The Council continues to work with ECC, South Essex Local Enterprise Partnership (SELEP) and Transport East on sustainable transport options to relieve the environmental impacts of the District's high reliance on the motor vehicle by residents, visitors and businesses.

## **Air Quality / Environmental Mitigation**

The Council is concerned at the recent (November and December 2019) declaration of Air Quality Management Areas in Maldon and Danbury, both on the A414. Whilst we acknowledge the Project will alleviate some congestion on local roads (caused when the A12 is closed), the District's residents and businesses rely on all of these local roads to connect to the A12 national road network.

This Council is concerned at the environmental impacts of congestion and pollution in Hatfield Peverel village originating from the Maldon District. How can we improve local air quality caused by congestion and queuing traffic on local road connections if the local road connections are not improved to connect to the A12?

The Council declared a Climate Emergency in February 2021 and is preparing a Climate Action Strategy and must contribute to reducing greenhouse gas emission by 2030. The Council has serious concerns to be able to reduce the environmental impacts of traffic congestion and pollution existing on the local road networks if the Project does not ensure an improved situation to connect to the A12 national road network for the future.

These thoughts and concerns have been repeatedly raised through engagement with Highways England, ECC and neighbouring Authorities and should be at the heart of the Project rather than leave a current situation to get worse before something is done.

Signed