

**A12 CHELMSFORD TO A120 WIDENING SCHEME (THE “PROJECT”)
PROCEDURAL DEADLINE A – 3 JANUARY 2023
SUBMISSIONS ON BEHALF OF LEGAL & GENERAL INVESTMENT MANAGEMENT
LIMITED – EXAMINATION PROCEDURE
INTERESTED PARTY REFERENCE: 20033134**

1. INTRODUCTION

- 1.1 Legal & General Investment Management (“L&G”) is an Interested Party (reference **20033134**) for the purpose of the Examination of the Project and submitted a Relevant Representation on 4 November 2022, which sets out in full L&G’s reasons for participation in the Examination and its objection to certain aspects of the Promoter’s proposed compulsory acquisition. CMS Cameron McKenna Nabarro Olswang LLP is acting on L&G’s behalf.
- 1.2 The purpose of this note is to set out L&G’s responses on procedural points raised in the ‘Rule 6 letter’ dated 12 December 2022 by the Examining Authority (“ExA”) by Procedural Deadline A on 3 January 2023 as requested.

2. PRELIMINARY MEETING, EXAMINATION PROCEDURE AND DRAFT TIMETABLE

- 2.1 L&G does not wish to actively participate in the Preliminary Meeting as L&G has no comments on the proposed procedure or timetable for the Examination.
- 2.2 Whilst L&G does not suggest that it is necessary for the ExA to visit the Estate as part of their inspections, L&G would like to take this opportunity to confirm that it is happy to facilitate the ExA’s inspection of the Estate if this is required.
- 2.3 Although L&G is not one of the parties identified by the ExA in the Rule 6 letter as requiring a Statement of Common Ground (“SoCG”), L&G and the Promoter are in ongoing negotiations to agree a SoCG for submission to the ExA. L&G considers that a SoCG will assist the ExA given that L&G’s concerns relate to one of the Principal Issues identified by the ExA in Annex C to the Rule 6 letter, compulsory acquisition and temporary possession.

3. OTHER

- 3.1 As requested by the ExA in the Rule 6 letter, L&G has submitted separate submissions on other topics, including L&G’s request to participate in upcoming hearings. L&G reserves the right to make further representations as part of the examination process and to register to participate in any further hearings, including relevant issue specific hearings, that may be proposed by the ExA in due course.

CMS CAMERON MCKENNA NABARRO OLSWANG LLP

3 JANUARY 2023