

Dated 13 February 2023

**APPLICATION BY NATIONAL HIGHWAYS LIMITED FOR AN ORDER GRANTING
DEVELOPMENT CONSENT FOR THE A12 CHELMSFORD TO A120 WIDENING
SCHEME**

PLANNING INSPECTORATE REFERENCE NUMBER: TR010060

REGISTRATION IDENTIFICATION NUMBER: 20033115

**SUMMARY OF WRITTEN REPRESENTATION
submitted on behalf of Network Rail
Infrastructure Limited**

Summary of Written Representation

1. Network Rail Infrastructure Limited (**Network Rail**) does not object in principle to the A12 Chelmsford to A120 widening scheme (**Proposed Development**). However, it objects to works being carried out on, and any compulsory powers being granted or executed, in relation to, or impacting on, operational railway land which it relies for the carrying out of its statutory undertaking.
2. The Applicant and Network Rail are in discussions in relation to the Proposed Development. However, to date, Network Rail have not received the specific information required from the Applicant to assess the extent of impacts in full. This information was first requested on 8th August 2022 and further requests for details have been made on a regular basis. It is also understood that once this information is provided, it may change during the lifetime of the Proposed Development. Therefore, Network Rail will continue to work with the Applicant during the lifetime of the Proposed Development to ensure the Proposed Development can be delivered without negatively impacting the railway and the development of Beaulieu station.
3. Network Rail has five primary concerns relating to the effect of the Proposed Development on its ability to protect and enhance the operational railway. In summary these are:

- a. **Restrictions on access and maintenance;**

Network Rail's access to the Great Eastern Main Line which is required to ensure the line can be safely maintained would be restricted by the Proposed Development.

- b. **Signal sighting;**

The Proposed Development will impact on sighting of Network Rail signals to train drivers, this is a concern which cannot be resolved by Network Rail modifying its infrastructure, it therefore necessitates modifications to the design of the Proposed Development

- c. **Beaulieu Station redevelopment;**

This is an important redevelopment scheme not just for the growth of the railway but also for the wider regeneration of Chelmsford. The Proposed Development impacts on Plots that will be needed for access, parking, utilities and drainage to the new station and its car park. There is also expected to be an impact on the electrification of the lines due to the height of the proposed Paynes Lane Footbridge and concern that Network Rail will lack sufficient space beneath the Footbridge to add a proposed third line of rails in connection with the new station.

- d. **Boreham Viaduct;** and

The proposed wall alongside the viaduct and rights of access beneath it would prevent access to the southern face of Boreham viaduct, and both wingwalls of the same. Such lack of access would hinder Network Rail's ability to undertake routine access, maintenance and/or repairs to the viaduct.

- e. **Existing infrastructure including drainage and embankment stability;**

Network Rail is concerned about additional strain on its existing infrastructure, in particular about the overbridge near junction 24, as it understands that the Proposed Development will result in an increase in traffic using the existing bridge. There is also

concern about and works at Plots 2/17g and 2/7m which would lead to structural implications relating to the stability of the existing railway embankments.

4. Until such time as Network Rail is given the protection and assurances requested as detailed in its full Written Representation (submitted alongside this summary), including appropriate protective provisions being included in the proposed order, Network Rail 's objection to the proposed order cannot be withdrawn. As set out in the Written Representation, Network Rail requests that its bespoke protective provisions replace those at Part 6 of Schedule 11 of the proposed order.
5. If sufficient progress regarding the protective provisions for railway interests and the private agreement between Network Rail and the Applicant is not made in the coming weeks, Network Rail intends to attend a hearing in June to explain in further detail its concerns with the Proposed Development.

Addleshaw Goddard LLP

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