

Essex Local Access Forum (ELAF) deadline 5 submission (10 May 2023)

Interested Party ref 2033138

As noted in ELAF's representation REP3-037, National Highways WCH proposals, mitigation of past & current practical severances and the proposed improvements to the WCH network is considered to fall short of that required by **NPPF paragraph 100** – ELAF bold:

*Planning policies and decisions should **protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails***

ELAF note that National Highways objectives for the proposed scheme, as set out in Environment Statement – Chapter 2: The Proposed Scheme [APP-069] and summarised on page 54 of National Highways's REP4-055 response to the ExA's questions include:

- Proposed scheme reduces the impact of severance of communities along the route
- Proposed scheme improves accessibility for walkers, cyclists, horse riders, and public transport users

As stated by National Highways, WCH users will in future be legally banned from using or crossing the widened A12, so alternative routes must be provided to compensate for this reduction in the available network. Whilst the proposed DCO scheme does mitigate the historic severance/ inability of WCH users to safely cross the A12 in several places, there are still several instances where the network remains severed – see ELAF's written submissions RR-026 and REP2-058.

re: WCH bridges – construction and usage

It is noted that, regarding WCH bridges, National Highways have stated that ... *“Bridges crossing the A12 with no bridleway connection are not yet bridleways but are nonetheless all future proofed for equestrian use (with a higher parapet) with the exception of the Marks Tey replacement bridge”*. This was the position as understood by ELAF so it was very concerning to read on page 54 in REP4-055 (National Highways response to ExA questions) that.... *“The term WCH, short for Walkers, Cyclists and Horse Riders is a generic term that refers typically to non-motorised users. The description of a route, or structure, being ‘WCH’ does not necessarily mean that it will be designated for use by all of those user groups”*. Also to read and to hear, at the recent ISH, that the proposed Gerswin Boulevard WCH Bridge would be for pedestrians only. **At what point and on whose authority would this bridge for example become available for use by cyclists and equestrians?** Similarly the proposed WCH Little Braxted Lane WCH bridge is designated for use by pedestrian and cycle use only despite bridleways being in the vicinity and the bridge connecting to public vehicular highways at either end.

As stated previously, ELAF are concerned with Access for All, so routes / structures labelled WCH (for walkers cyclists and horseriders) must genuinely be designed for and be available for use by walkers, cyclists and horse-riders together with people with dogs / buggies, runners & mobility or visually impaired users.

Re: Ashman's Bridge and Kelvedon FP 30 / Great Braxted FP 19

ELAF made suggestions regarding this re-located bridge and adjacent PROWs in REP3-037. ELAF fully support ECC's REP4- 075 submission page 3-4 that.....

“We ask that National Highways additionally seek to provide improvements for horse riders through dedication of a bridleway over footpaths 30 (Kelvedon) and 19 (Great Braxted), a distance of <600m, and provision of a bridleway bridge (Ashman's Farm footbridge) instead of replacing the current footbridge. This will connect our network of bridleways north to those south of Kelvedon. The scheme already requires that the footpath and footbridge are moved so upgrade to a bridleway is considered reasonable.

ELAF fully support ECC's REP4-075 submission page 24 that.. *“both Marks Tey and Paynes Lane overbridges provide an attractive, pleasurable experience that will encourage future growth in active travel, they should*

be redesigned as segregated walking cycling bridges.” However, as previously noted Paynes Lane WCH bridge connects bridleways so this bridge should be a full WCH bridge from the start including equestrians use.

Re: Coleman’s Cottage Fishery and Witham FP 103 [PROW 121-103]

National Highways propose to mitigate the current legal, but practically unsafe, crossing of the A12 by Witham FP 103 by looping Witham FP 103 back to the Little Braxted Lane and bridge along a route squeezed between the widened A12 and the private fishing lake. However, the existing off-road cycleway, and hence also pedestrian connection, along Little Braxted Lane between Witham FP 103, and Rivenhall Bridleway 29, and the existing bridge over the A12 (Coleman’s Bridge) can be used now if people wish to cross the A12 in this vicinity. So National Highways proposal is not enhancing the network to any significant extent – especially as the Witham FP 103 on this “country” side of the A12 will be primarily used for leisure purposes and not for direct active travel.

The ELAF proposal to link Witham FP103 [PROW 121-103] with the Whetmead Nature Reserve and Witham FP 101 [PROW 121-101] along the “country” (south) side of the A12 is within National Highways red line boundary and so does not require any additional land take. As stated, it would provide a circular leisure route for the people from Witham linking two A12 crossing points – the re-configured Little Braxted Lane bridge and the existing Witham FP 101 underpass. It would fill a network gap as there are no PROW /WCH routes between Little Braxted Lane and the WhetMead Nature Reserve (open public access) so would meet the NPPF paragraph 100 criteria and ECC’s ROWIP.

ECC’s support and preference expressed on page 27 of REP4-075 for ELAF’s proposal is welcome. The plan from ECC’s document REP4-075 page 27 is included below to be read together with ECC’s text that to...*“create a path south instead, linking footpath 103 with footpath 121, a route that would follow alongside the A12 within the red line boundary (indicated by pink dots in the plan extract below). This would be our preferred outcome. We would be happy for these paths to follow vehicle access tracks / maintenance tracks once the build is complete.”*



re: Gershwin Boulevard WCH bridge and Witham FP 95 [PROW 121-95]

ELAF welcomes and supports ECC’s comments on page 26 of REP4-075 that... *“The council has no issue in principle with the bridge being constructed further to the west as has been requested by some stakeholders. In fact, we consider that there could be a small overall network benefit insofar as it could provide a more direct route for cyclists.”* ELAF support ECC’s requirement that there is a link on the “country” (southern)

side of the A12 between Howbridge Hall Road / the bridge landing and the southern end of Witham FP 95 as has previously been requested by ELAF. The plan from ECC's document REP4-075 page 26 is included below.



Re: Prested Hall & Feering FP 15 [PROW 78-15] & Feering FP 18 [PROW 78-18]

National Highways propose replacing two existing bridges over the A12 at the north end of Feering with one bridge (ref: sheet 15 of Streets, Rights of Way & Access Plans Part 2 REP4-004). This is a diminution of the WCH network and is not in keeping with NPPF paragraph 100, ECC's ROWIP and also not in keeping with National Highway's own objectives of... *"improving accessibility for walkers, cyclists, horse riders, and public transport users."*

The Feering FP 15 and Prested Hall Drive will be severed; Threshelfords FP 18 / farm accommodation bridge will be demolished and will be replaced by Prested Hall Bridge, a road bridge with a cycleway along one side; Feering FP 18 will become a foot-cycle-way in part and will follow a longer convoluted route.

The owners of Prested Hall, a listed building, and the Leisure centre have also expressed their concerns about the removal of the direct access afforded by Prested Hall Drive with its wide grass verges and mature trees. The new 6-lane A12 will decimate the drive and its mature trees. National Highway's description on page 59 of REP4-055 of Prested Hall Drive as a route with.... *"no walking or cycling facilities so users must walk in the road or grass verge"* paints a misleading picture.

Prested Hall Drive: view south towards the Hall in the vicinity of where the drive will be crossed by the A12



Removal of two bridges and replacement by one, means that local people will no longer be able to undertake a short circular walk over Threshelfords Bridge, along FP 18 and then returning along the drive of FP 15. As there will be 1000 new homes in this area of Feering, the loss of a circular leisure route is deplored. The East Anglian Farm Ride that connects at the north end of Prested Hall Drive will also be negatively affected.

ELAF repeat their request for a WCH bridge over the new A12 to enable continued direct access to Prested Hall & its leisure facilities and the by local residents.