

A12 Chelmsford to A120 widening scheme

TR010060

9.82 Closing Statement – Annex 1 Summary of Applicant's case in respect of Outstanding Representations by Affected Parties

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A12 Chelmsford to A120 widening scheme
Development Consent Order 202[]

Closing Statement – Annex 1

**Summary of Applicant's case in respect of Outstanding
Representations by Affected Parties**

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1 Introduction

- 1.1.1 This Annex should be read in conjunction with the Applicant's Closing Statement [REP7-078]. It provides the Applicant's closing submissions in relation to the compulsory acquisition related objections made by Affected Parties in relation to the interests in land sought by the Applicant in the application for Development Consent for the A12 Chelmsford to A120 Widening Scheme (the **proposed scheme**).
- 1.1.2 The Applicant's Statement of Reasons [REP7-040] contains detailed information in relation to compelling case for each plot and elaborates on the Applicant's compliance with conditions in Section 122 of the Planning Act 2008. Having considered the representations made by affected parties, the Applicant continues to believe that there is a compelling case in the public interest for compulsory acquisition for the plots proposed.
- 1.1.3 The need for, and the benefits of, the proposed scheme are summarised in Section 1 of the Statement of Reasons and in the other application documents, including the Case for the Scheme [APP-249]. Together with the Applicant's closing submissions, they demonstrate that there is a compelling need in the public interest for the proposed scheme to be delivered and for the compulsory acquisition and temporary possession powers over the land required to deliver the proposed scheme.
- 1.1.4 In particular, as set out at Chapter 2 of the Case for the Scheme, paragraph 2.2 of the National Policy Statement for National Networks (NNNPS) identifies a "critical need" to improve the national networks to address road congestion and crowding on the railways to provide safe, expeditious and resilient networks that better support social and economic activity; and to provide a transport network that is capable of stimulating and supporting economic growth. It goes on to state that improvements may also be required to address the impact of the national networks on quality of life and environmental factors.
- 1.1.5 The proposed scheme is a committed scheme in the Road Investment Strategy 2, see para 2.2.3 of the Applicant's Case for the Scheme. [APP-249]. The proposed scheme has been promoted for many years and is identified as a national priority in the National Infrastructure Delivery Plan, East of England Route Strategy, various Highways England plans and the DfT's RIS1 and RIS2.

1.2 Borrow Pits

- 1.2.1 In relation to land required for Borrow Pits, three of the four parties with an interest in the land intended to be used for borrow pits have objected to the acquisition of their land for the purpose of providing the Applicant with the opportunity to extract material from borrow pits for the purpose of constructing the proposed scheme. The detail of that objection has been addressed in the table below.
- 1.2.2 For each of the Borrow Pits related representations, the Applicant believes there is a compelling need for the powers sought for the reasons given in the

Applicant's Borrow Pits Report [APP-278], Borrow Pits Supplementary Technical Note – Rev 1 [REP1-011], Borrow Pits Cost Information [REP3-023], Borrow Pits Summary Report [REP5-015] and section 5.6 of the Applicant's Statement of Reasons [REP7-009]. The Applicant submits the compulsory acquisition of land for borrow pits is necessary to:

- secure the quality and quantity of material required to construct the proposed earthworks close to the point where the materials are required;
- secure the scheme programme (linked with cost, Open for Traffic date and design year); and
- minimise the traffic impacts from construction activities and its related environmental impacts such as greenhouse gas emissions.

1.2.3 The extent of land take required is proportionate with the quantity of material that is required to be won to meet the scheme earthworks deficits. The acquisition of land for borrow pits to meet the proposed scheme earthworks deficit has come as a result of an extensive assessment to determine the best way to construct the proposed scheme. The options to meet the earthworks volume deficit were considered in the early stages of delivery strategy development, which determined that borrow pits are necessary for delivering the proposed scheme.

2 Table Summarising Applicant's Case Regarding Representations by Affected Parties

- 2.1.1 The table prepared by the Applicant set out below, describes
- the Affected Party who submitted an objection on compulsory acquisition grounds;
 - the plots affected;
 - the works the Applicant proposes to carry out on those plots; and
 - the Applicant's case for acquisition and description of the proposed works.
- 2.1.2 The table also provides document references to facilitate the identification of the relevant representations and responses to additional documents submitted during the course of Examination.
- 2.1.3 The table is set out in the order reflecting section 9 of the Applicant's Closing Statement [REP7-078], in particular the section commencing at paragraph 9.1.52.

Table 1 – Summary of Applicant's Case Regarding Representations by Affected Parties

	Objector	Plots	Work Number	Applicant's case for acquisition	Document references
1	The Honourable John Frederick Strutt and The Right Honourable John Gerald Sixth Baron Rayleigh	<p>Permanent acquisition of all interests in land: 5/12a, 5/12b, 5/12c, 5/12e, 6/7a, 6/12b, 6/12d, 6/29a, 6/29b, 6/29c and 4/9a, 5/36a, 5/36c</p> <p>Land to be used temporarily and new rights to be acquired permanently: 5/12d, 5/12h, 6/12c, 6/12g, 4/9c</p> <p>Land to be used temporarily: 5/12f, 5/12g, 6/12a</p>	<p>Permanent acquisition of all interests in land: 8(a), 8(b), 9, 12(a), 12(b), 14(a), 14(b), 15, 16, 17, 18(a), 18(b), 18(c), 18(e), 19, 20, U23, U24, U25, U27, U28, U38A, U39, U40, U41, U42, U43, U44, U49, T14, T17, T18</p> <p>Land to be used temporarily and new rights to be acquired permanently: U25, 8(a), U38, U38A, U40, U41, U42, U49, 17.</p>	<p>The Applicant seeks to acquire these plots for the new junction 21, associated slip roads, earthworks and drainage, a borrow pit, compound, utilities, access and ecological mitigation.</p> <p>The acquisition of the Affected Parties' land provides the Applicant with the opportunity to extract material from borrow pits for the purpose of constructing the proposed scheme and reducing environmental impacts and costs arising from materials being exported from outside the order land.</p> <p>It is necessary to seek powers to permanently acquire land where the works required by the proposed scheme would result in a permanent change</p>	<ul style="list-style-type: none"> • RR-186 • Applicant's Response to Relevant Representations: [REP1-002] at page 1114 - 1146 • dDCO [APP-039] • Streets, Rights of Way and Access Plans Part 1 (D6) [REP6-013] • Streets, Rights of Way and Access Plans Part 2 (D6) [REP6-014] • Streets, Rights of Way and Access Plans Part 1 [AS-027] • Streets, Rights of Way and Access Plans Part 2 [AS-028] • Borrow Pits Report [APP-278], • Borrow Pits Supplementary Technical Note – Rev 1 [REP1-011],

	Objector	Plots	Work Number	Applicant's case for acquisition	Document references
		6/12e, 6/12f, 6/12h, 5/20a, 4/9b, 5/12i 5/36b	Land to be used temporarily: 8(b), 9, 10, 17, 18(b), T7, T8, T13, T14, T16, T17, T18, U41A	to the nature of the land once completed. This is because Article 40(4) of the draft Development Consent Order [APP-039] would require the Applicant to restore to current levels borrow pits worked, in land subject to temporary powers only. The permanent change to the land means that permanent acquisition powers are the appropriate power to be sought and there is a compelling case for the winning of the material from the borrow pit. The Applicant's case for Borrow Pits for the scheme is set out in Paragraph 1.7 above. These plots are also required in relation to rights to pass and repass and to remain on the land, with or without vehicles, plant or machinery for the purposes of access to adjoining land. Two private means of access to the	<ul style="list-style-type: none"> • Borrow Pits Cost Information [REP3-023], • Borrow Pits Summary Report [REP5-015] • section 5.6 of the Applicant's Statement of Reasons [REP7-009]

	Objector	Plots	Work Number	Applicant's case for acquisition	Document references
				<p>Affected Party's land from the link road to Hatfield Peverel and the link road to Witham are shown on the Streets, Rights of Way and Access Plans [REP6-013, REP6-014, AS-027, AS-028].</p> <p>New rights are required to lay, install, construct, retain, inspect, maintain, protect, retain use, enlarge, replace, renew, remove or render unusable a buried sewer together with rights to pass and repass and to remain on the land, with or without vehicles, plant or machinery. The Applicant seeks to include restrictive covenants for protecting the installed sewer or apparatus from excavation, damage or injury; to not materially reduce the depth of soil above the installed sewer or apparatus; and to prevent access to the installed sewer or apparatus</p>	

	Objector	Plots	Work Number	Applicant's case for acquisition	Document references
				<p>being made materially more difficult.</p> <p>Land is required to be used temporarily for access to temporary car park and access for bus shuttle service during construction of Station Road structure. It is also required as temporary car park of approximately 31000 square metres in area between the Great Eastern Mainline Railway and The Vineyards, Hatfield Peverel; as a temporary road between Junction 20b and junction 21; construction material storage, temporary PRow and associated utility works.</p> <p>The Applicant responded to the points raised by the Affected Parties' relevant representation through the document submitted at Deadline 1, 'The Applicant's Response to Relevant</p>	

	Objector	Plots	Work Number	Applicant's case for acquisition	Document references
				<p>Representations' [REP1-002]. The Applicant relies on those representations.</p> <p>There has been extensive engagement between the parties throughout the examination process, which continues.</p>	
2	Deanna Bunting and Susan Bunting, Executors of Robert Anthony Bunting and JA Bunting and Sons	Permanent acquisition of all interests in land: 12/9a, 12/23a – subsoil, 12/23b – subsoil, 12/23c – subsoil, 12/24a, 12/26a, 13/14a, 13/14b, 13/14d, 13/14e, 13/14f, 13/14h, 13/14k, 13/17a, 13/19a, 14/3a, 14/3c, 14/3i, 14/3k, 14/3m, 14/4a, – subsoil, 14/10a – subsoil, 14/17b – subsoil,	Permanent acquisition of all interests in land: 24(g), 45(a), 45(b), 50, 51(a), 51(b), 55(a), 55(c), 52, 57, 58, 59, 60, 60A, 61(a), 61(b), 61(d), 62(a), 62(b), 64, 65(a), 65(b), 66(a), 67(b), 68(a), 69(a), 69(b), 70, 71, 72(a), 72(b), 73, 74(a), 74(b),	The Applicant seeks to acquire these plots for alteration of the A12 carriageway, a borrow pit, accesses, flood mitigation, attenuation ponds, proposed public footpaths, haul roads, construction of slip roads, new Essex Fire and Rescue access road, the realigned Maldon Road, Domsey Brook and Highfields Lane, new Inworth Link and Inworth roundabout, demolition and replacement bridge (Ewell Overbridge) and diversions of communication cables,	<ul style="list-style-type: none"> • Relevant Rep RR-007 • Borrow Pits Report [APP-278], • Borrow Pits Supplementary Technical Note – Rev 1 [REP1-011], • Borrow Pits Cost Information [REP3-023], • Borrow Pits Summary Report [REP5-015] • section 5.6 of the Applicant's Statement of Reasons [REP7-009]

	Objector	Plots	Work Number	Applicant's case for acquisition	Document references
		<p>14/19a – subsoil, 20/1a – subsoil, 20/4a, 20/4b, 20/4e, 20/4f, 20/5a, 21/2a</p> <p>Land to be used temporarily and new rights to be acquired permanently:</p> <p>13/14c, 13/14g, 13/14j, 14/3g, 14/3j, 14/3n, 14/7a – subsoil</p> <p>Land to be used temporarily:</p> <p>12/9b, 13/14l, 14/3b</p> <p>14/3d, 14/3f, 14/3l</p> <p>14/24a, 13/14l, 14/3b</p> <p>14/3d, 14/3f, 14/3l</p>	<p>74(c), 75, 76, 76A, 77, 113, 114, 116, 117, 119, 122, U129, U134, U136, U136A, U137, U138, U139, U140, U141, U141A, U142, U143, U144, U145, U145A, U146, U146A, U146B, U146C, U147, U147A, U147B, U147C, U147D, U148, U149, U154, T36, T37</p> <p>T38, T39, T40, T42, T43, T45.</p> <p>Land to be used temporarily and new rights to be acquired permanently:</p>	<p>electricity cables, water mains and foul sewers.</p> <p>New rights are required for accesses and haul road and diversion of electricity cables, communication cables, water mains and sewers.</p> <p>Land is required temporarily to be used for construction material storage, construction access, laydown areas, welfare facilities, working area and storage of plant, access / working room for construction of temporary soil storage bunds and soil storage area during construction works; temporary PRow and diversion of a buried water main of approximately 100 metres in length crossing the proposed New Inworth Link.</p> <p>The Applicant's case is set out in its Response to Relevant Representations</p>	<ul style="list-style-type: none"> • Response to Relevant Rep: [REP1-002] at page 45 to 148 • Written Submissions of Oral Representations made at Hearings [REP5-020] at page 62 to 79 • Written Submissions of Oral Case for Compulsory Acquisition Hearing [REP3-014] at page 66 to 70 • Applicant's Comments on Information received at Deadline 5 [REP6-090] at page 133 to 138 • Applicant's written submission of oral case at CAH3 [REP7-044] at page 14 to 16 • Applicant's Comments on Information received at Deadline 2 [REP3-015] at page 117 to 119

	Objector	Plots	Work Number	Applicant's case for acquisition	Document references
		14/24a	<p>45(a), 65(a), U136, U146C, U147, U148, T39.</p> <p>Land to be used temporarily:</p> <p>45(a), 45(f), 52, 59, 60A, 61(d), 62(a), 65(b), 69(a), 69(b), T39, T43, U142</p>	<p>[REP1-002] and the position set out in its submissions of oral representations at ISH 3 [REP5-020] Sections 6.2, 6.4 6.9 and 6.10; CAH 2 [REP5-022]; and in the Applicant's Comments on Information received at Deadline 5 [REP6-090].</p> <p>In respect of the proposed borrow pit, the Applicant has demonstrated there is a compelling case for the need and extent of the proposed extraction at this location, as with each of the proposed borrow pits, in accordance with its submitted Borrow Pits Report [APP-278] and subsequent supporting borrow pit documentation.</p> <p>Engagement with the Affected Party continues. Heads of Terms have been agreed in principle and legal teams have been instructed to</p>	<ul style="list-style-type: none"> • Applicant's Comments on Information received at Deadline 3 [REP4-056] at page 98 to 108 • Applicant's Comments on Other's Responses to ExQ3 [REP7-046] at page 33 to 46

	Objector	Plots	Work Number	Applicant's case for acquisition	Document references
				progress the formal agreement. The most recent meeting took place on 12 June 2023.	
3	Henry Robert Siggers/Parker Strategic Land	<p>Permanent acquisition of all interests in land: 11/8a, 11/8c, 11/8d, 11/17a, 11/18a, 12/4a</p> <p>Land to be used temporarily and new rights to be acquired permanently: 11/9a, 12/5d</p> <p>Land to be used temporarily: 2/5b</p>	<p>Permanent acquisition of all interests in land: 24(a), 24(g), 37(c), 37(e), 39(a), 39(c), 39(d), 40(a), 40(b), 42(a), 42(b), 43(a), 43(b), 48, U106, U107</p> <p>U113, U131, T26, T30, T32, T34</p> <p>Land to be used temporarily and new rights to be acquired</p>	<p>The Applicant seeks to acquire the land for works required for the alteration of the A12, a borrow pit, ecology mitigation, realignment of Henry Dixon Road and Rivenhall Brook, accesses and haul roads, Rivenhall Brook Culvert, Rivenhall End East Roundabout, new B1024 Link Road, public footpaths, attenuation pond, diversion of electricity cables, a gas pipeline and a foul sewer.</p> <p>The Applicant seeks new rights for diversion of communication cables and haul road.</p> <p>Land is required temporarily as a haul road of approximately 1200 metres in</p>	<ul style="list-style-type: none"> • RR-021 • Written Reps and Summaries [REP2-110] • Applicant's Response to Relevant Representations' [REP1-002] at page 293 to 318 • The Applicant's Comments on Written Representations' [REP3-009] at page 384 to 402 • Applicant's written submission of oral case at CAH2 [REP5-022] at page 15 to 16; 23 to 24; • Written Submissions of Oral Case for Compulsory Acquisition

	Objector	Plots	Work Number	Applicant's case for acquisition	Document references
			<p>permanently: U125, T34.</p> <p>Land to be used temporarily: 1(a), 1(b), 1(c), 1(g), U6, U7, U10, U12, T3</p>	<p>length between Borrow Pit I and Cranes Lane, Kelvedon. As construction material storage, construction access and temporary storage, laydown areas, access and working space to facilitate the construction of Sniveller's Lane Bridge.</p> <p>In its Relevant Representation a 1.5, Parker states it “does not object to the overall principle of the Scheme” but strongly objects to the permanent acquisition of part of the Site, as is defined by reference to a plan appended to the relevant representation. It includes objection on lack of compelling case and Human Rights grounds.</p> <p>The Affected Parties have engaged extensively in the Hearings, including at the Open Floor Hearing, following which the Applicant agreed to</p>	<p>Hearing [REP3-014] at page at page 53 to 66</p> <ul style="list-style-type: none"> • Applicant's Comments on Information received at D5 [REP6-090] at page 225 to 245 • Borrow Pits Report [APP-278] • Borrow Pits Summary Report [REP5-015] • Applicant's written submission of oral case at CAH3 [REP7-044] at page 22 • Applicant's Comments on Information received at Deadline 5 [REP6-090] at page 225 to 244 • Applicant's Case for the Scheme [APP-249]. • Appendices to Applicant's Case for the Scheme [APP-250 to APP-252].

	Objector	Plots	Work Number	Applicant's case for acquisition	Document references
				<p>Parker Strategic Land being viewed as an Interested Party and Parker Strategic Land agreed to provide a redacted copy of its recently signed promotion agreement; and most recently at CAH3.</p> <p>The Applicant believes the policy support of the Scheme is overwhelming and the scheme is in accordance with the relevant parts of the NNNPS – see the Applicant's Case for the Scheme [APP-249].</p> <p>In contrast, whilst the Affected Parties have development aspirations for the land, there is no allocation in the recently adopted Braintree Local Plan for the relevant parts of the Order land. See page 243 of REP6-090.</p> <p>The Applicant submits there is a compelling need for the</p>	

	Objector	Plots	Work Number	Applicant's case for acquisition	Document references
				<p>relevant borrow pit to provide granular engineering material for the proposed scheme- see Borrow Pits Report [APP-278] para 6.4.13. The Applicant's case is further set out in its responses to the representations made by the Affected Parties at Deadline 6 – see pages 225 on of REP 6-090.</p> <p>As is stated in para 8.4 of the Applicant's Written Submission of Oral Case at CAH2 [REP5-022], the affected parties suggested that the figures for the deficit fill and the volumes to be taken from the borrow pits are unclear. The Applicant has been entirely consistent and has fully justified the figures presented. In summary there is 1.9Mm³ required and 1.3Mm³ available from the scheme which leaves a deficit of 0.6.Mm³ of general fill</p>	

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				<p>required, to be sourced from borrow pits E (100,000m³), F (100,000m³) and I (400,000m³). In addition, a further 445,000m³ of engineering fill is required, of which 300,000m³ is available from borrow pit J. The Applicant produced a simplified summary of its case for the borrow pits and the quantities required. (See the A12 Proposed Scheme Earthworks Deficit Plan in the Borrow Pits Summary Report at "Plate 2.2" [REP5-015]).</p> <p>Whilst negotiations with the Affected Parties will continue the Applicant believes the extent and nature of the proposed permanent acquisition is reasonable and is required for the proposed scheme to proceed.</p>	

	Objector	Plots	Work Number	Applicant's case for acquisition	Document references
4	Simon Robert Brice, Pamela Brice and Clare Brice/ Coleman's Quarry	Permanent acquisition of all interests in land: 9/13a, 9/13d, 9/13e, 9/13f, 9/13g, 9/22a, 9/22b, 10/7a, 10/20a, 10/20c, 10/20e, 10/20g, 10/20j, 10/20k, 10/23a, 10/27a – subsoil, 10/28a – subsoil, 11/4b, 11/4c, 11/4d, 11/4f, 11/4g, 11/4j, 11/4k, 11/4m, 11/10a, 11/16a – subsoil, 11/18a, 12/16a, 12/23a – subsoil, 12/23b – subsoil, 12/23c – subsoil, 13/5a, 13/10a – subsoil Land to be used temporarily and new rights to be	Permanent acquisition of all interests in land: 12(c), 24(a), 24(b), 24(g), 30, 30A, 32(a), 32(b), 32(c), 32(d), 33(a), 33(b), 34(a), 34(b), 35(a), 35(b), 36, 37(a), 37(b), 37(c), 37(d), 37(e), 38(a), 38(b), 39(a), 39(b), 41(a), 41(b), 41(c), 42(a), 42(b), 43(a), 44(a), 44(b), 45(a), 45(c), 46(a), 46(b), 48, 50, 50A, 51(a), 55(c), 61(b), 61(c), 63(a), 63(b), U22A, U49, U51, U75, U76, U77,	The Applicant seeks to acquire these plots for: <ul style="list-style-type: none"> • Compounds • Accesses, slip roads and haul roads • Diversions of electricity cables, communication cables, foul sewers and water mains • Attenuation ponds • Public footpaths • Culverting • Flood mitigation • Realignment of Highfields Lane, Rivenhall Brook, Braxted Road, Henry Dixon Road, Colchester Road • Northern connector road • New Rivenhall End West Roundabout • Demolition of Colemans Bridge and construction of Little Braxted Bridge • Northern and southern roundabouts of J22 and 	<ul style="list-style-type: none"> • RR-119 • The Applicant's Response to Relevant Representations' [REP1-002] at page 805 - 810 • SoCG with Brice Family [REP2-014] • Applicant's written submission of oral case at CAH2 [REP5-022] at page 12 to 14

	Objector	Plots	Work Number	Applicant's case for acquisition	Document references
		<p>acquired permanently: 9/13b, 9/19a – subsoil, 9/19b – subsoil, 10/20f, 10/20h, 10/20i, 11/4n</p> <p>Land to be used temporarily: 9/13c, 10/20b, 10/20d, 11/4a, 11/4e 11/4l, 13/5b</p> <p>Part 1 (Category 2) and Part 3</p> <p>Permanent acquisition of all interests in land: 11/8d, 11/10a, 11/20b, 12/4a</p>	<p>U79, U80, U81, U82, U83, U87, U88, U89, U89A, U90, U91, U92, U93, U94, U95, U96, U97, U98, U99, U100, U101, U104A, U106, U107, U108, U109, U111, U111C, U112, U113, U116, U117, U118, U119, U120, U121, U122, U132, U134, U137, U139, U140, T26, T20, T31, T32, T33, T37</p> <p>Land to be used temporarily: 37(a), 46(a), 48, T26, T29, T37</p>	<p>Little Braxted Lane Overbridge</p> <ul style="list-style-type: none"> • Rivenhall Culvert • Temporary bridge. Carriageway storage, laydown areas, access and working spaces • Bunds <p>Land is required temporarily as a haul road of approximately 3700 metres in length between Brain Bridge, Witham and the proposed Borrow Pit I, including the provision of utility protection slabs and a temporary access and egress onto the A12 southbound carriageway at a point to the west of Barrows Creep Underpass. Also required for construction material storage, construction access, laydown areas, welfare facilities, working area and storage of plant.</p>	

	Objector	Plots	Work Number	Applicant's case for acquisition	Document references
		<p>Land to be used temporarily and new rights to be acquired permanently:</p> <p>11/9a</p>		<p>The Brice family own the quarry land which forms the new Junction 22 of the A12. To ensure that minerals are extracted ahead of construction works, the Applicant has been working with the Brice family on the construction programme and supporting them in amending the original planning permission so that the phasing of the mineral extraction can align with the A12 works. That part of the Order land that comprises part of Colemans Quarry is required for the works to provide the new Junction 22 of the A12. There is a compelling case in the public interest for the acquisition of the required land held by the Brice family at that location and the parcels to the northeast of Colemans Quarry that are also required for the proposed scheme, as the land</p>	

	Objector	Plots	Work Number	Applicant's case for acquisition	Document references
				is required for the principal works and for the provision of the new Junction 22. The Applicant has been working with the Brice family to provide for a solution that allows for the winning of materials from the quarry and subsequent backfill prior to the proposed scheme construction.	
5	David and Stephen Bolton	<p>Permanent acquisition of all interests in land: 1/11a, 1/15a, 2/6a – subsoil, 2/9a – subsoil, 2/12a, 2/12g, 2/19a, 2/20a – subsoil</p> <p>Land to be used temporarily and new rights to be acquired permanently:</p>	<p>Permanent acquisition of all interests in land: 1(a), 1(b), 1(c), 1(d), 2(a), 2(b), 3(a), 3(b), 4, 6(b), 7(b), U1, U1A, U2, U2A, U2B, U3, U3A, U3B, U3C, U5, U10C, U11, U12A, U12B, U13, U14, U14A, U16, U17, U18,</p>	<p>The Applicant seeks to acquire the land for:</p> <ul style="list-style-type: none"> • Junction 19 slip roads • Attenuation ponds • Access tracks • Diversion of water mains, electricity cables, gas pipelines, foul sewers and surface water drains • Access and working room • Widening of the existing A12 carriageway • Widening of Boreham Bridge and Main Road 	<ul style="list-style-type: none"> • Applicant's Response to Relevant Representations - Rev 2 [REP1-002] at page 431 to 470 • Applicant's Comments on Written Representations [REP3-009] at page 85 to 106 • Outline Construction Traffic Management plan [REP2-003] • Written submissions of oral representations

	Objector	Plots	Work Number	Applicant's case for acquisition	Document references
		<p>1/11c, 1/11d, 1/11f, 1/11g, 2/12b, 2/12c, 2/12d, 2/12f, 2/12h, 2/12j, 2/12l, 2/12o</p> <p>Land to be used temporarily:</p> <p>1/11e, 2/12i, 2/12m</p>	<p>U19, U20, U20A, U21, U22, T1.</p> <p>Land to be used temporarily and new rights to be acquired permanently:</p> <p>1(a), 5, U1A, U3, U3C, U5, U10C, U11, U12A, U12B, U13, U15, U20, U20A, T1, T6</p> <p>Land to be used temporarily:</p> <p>1(a), 5, T1, T6, U1A</p>	<ul style="list-style-type: none"> • Alterations to Generals Lane Roundabout and Generals Farm Roundabout • Resurfacing and extension of Paynes Lane • Paynes Lane bridge <p>The Applicant seeks to acquire new rights for:</p> <ul style="list-style-type: none"> • Diversion of gas pipelines, water mains, communication cables, electricity cables and a surface water drain • Haul roads • Compound and traffic management and recovery yard • Access/working room for future maintenance <p>Land is required temporarily as a haul road of approximately 1200 metres in length, south of the existing junction 19 and to the east of</p>	<p>made at Hearings 2 [REP5-022] at page 15 to 19; 30 37</p> <ul style="list-style-type: none"> • Applicant's written submission of oral case at CAH3 [REP7-044] at page 23 to 24

	Objector	Plots	Work Number	Applicant's case for acquisition	Document references
				<p>the A12 southbound verge, Springfield. For access / working room for construction of temporary soil storage bunds and soil storage area during construction works and associated Utility Works is a permanent diversion of private buried service, therefore no statutory undertaker powers are required. The land is also required as a compound and traffic management and recovery yard between the B1137, Main Road and the A12 southbound carriageway.</p> <p>The Affected Parties object of the compulsory powers sought on the basis of there being no justification for permanent acquisition, in particular for mitigation land; as well as the impacts on the parties' aspirations for their</p>	

	Objector	Plots	Work Number	Applicant's case for acquisition	Document references
				<p>land and impacts on current use of the land.</p> <p>The Applicant has been able to reduce the extent of the Affected Parties' land subject to powers in the Order, as a result of the Applicant's change application.</p> <p>The Applicant is otherwise satisfied that the land is required for the purposes of the Order and the detailed reasons are set out in the Applicant's written submission of oral case for Compulsory Acquisition Hearing 2 at 8.14 [REP5-022].</p> <p>As was discussed in Compulsory Acquisition Hearing 3, the Applicant will where possible, enter into agreement with the affected parties on reasonable terms where it is possible by agreement to secure the</p>	

	Objector	Plots	Work Number	Applicant's case for acquisition	Document references
				<p>proposed works and the ability to create by agreement new rights for the Applicant and other parties but, absent such agreement there remains a compelling case in the public interest for the Applicant to secure the freehold of the required land ss all of the land is required for the scheme to proceed and for the provision of essential mitigation.</p> <p>In respect of existing operations, the Applicant has committed to minimising impacts on the car boot sale in paragraph 2.2.7 of the Outline Construction Traffic Management plan [REP2-003].</p> <p>The Applicant has responded to the points raised through the relevant representation and written representation through the documents</p>	

	Objector	Plots	Work Number	Applicant's case for acquisition	Document references
				submitted at Deadline 1 and Deadline 3 respectively, 'The Applicant's Response to Relevant Representations' [REP1-002] and 'The Applicant's Comments on Written Representations' [REP3-009].	
6	Roger Frederick Wacey, Christine Joy Wacey and Nathan Wacey	<p>Part 1 (Category 1) Land to be used temporarily and new rights to be acquired permanently: 18/9a</p> <p>Part 1 (Category 2) and Part 3 Permanent acquisition of all interests in land: 18/6b</p>	<p>Part 1 (Category 1) Land to be used temporarily and new rights to be acquired permanently: U178, U180, U180A.</p> <p>Part 1 (Category 2) and Part 3 Permanent acquisition of all interests in land:</p>	<p>The Applicant seeks to acquire new rights over a small part of land forming an access route to Wishing Well Farm for the purpose of diverting communication cables, electricity cables and a water main. No part of the freehold of Wishing Well Farm is proposed to be permanently acquired.</p> <p>The permanent new rights are required for the diversion of electricity cables.</p> <p>Land is required temporarily for construction material storage, construction access,</p>	<ul style="list-style-type: none"> • RR-061 • Applicant's Response to Relevant Representations - Rev 2 [REP1-002] at page 542 to 545 • Applicant's Comments on Written Representations' [REP3-009] at page 376 to 378 • Written Submissions of Oral Case for Compulsory Acquisition Hearing [REP3-014] at page 52 • Applicant's written submission of oral

	Objector	Plots	Work Number	Applicant's case for acquisition	Document references
		<p>Land to be used temporarily and new rights to be acquired permanently: 18/6g</p> <p>Land to be used temporarily: 18/6a</p>	<p>68(a), 68(b), 94(d), 96(b), 100, 101, 102(a), 102(b), 102(c), 107, 108, U178, U180, U180A, U181, U182, U183, U184, U187, U194, U195, U196, U197, U202, U207, T51</p> <p>Land to be used temporarily and new rights to be acquired permanently: U180</p> <p>Land to be used Temporarily</p>	<p>laydown areas, welfare facilities, working area and storage of plant. Access / working room for construction of temporary soil storage bunds and soil storage area during construction works. Temporary storage, laydown areas, access and working space to facilitate the construction of Potts Green Bridge.</p> <p>This objection was made principally on the basis of the injurious affection that would be caused to Wishing Well Farm as a result of the Proposed Scheme. A blight application had been accepted by the Applicant and the delay was in relation to receiving a claim from the Wacey's agent. The claim has now been received and is being considered by the Applicant. The value for Wishing Well Farm is</p>	<p>case at CAH2 [REP5-022] at page 3 and 15</p> <ul style="list-style-type: none"> • Applicant's Comments on Information received at Deadline 5 [REP6-090] at page 5 • Applicant's Comments on Information received at Deadline 3 [REP4-056] at page 238 to 240

	Objector	Plots	Work Number	Applicant's case for acquisition	Document references
			68(a), 100	<p>provisionally agreed subject to receipt by the Applicant of a building surveyor's report. The building condition report was received on the 10 July 2023, it is currently being reviewed with a view to agreeing the market value of the property.</p> <p>The Applicant's Response to Relevant Representations' [REP1-002] at page 542 to 545 sets out the Applicant's responses to the objections and explains why the new rights and temporary powers are required.</p> <p>The Applicant has accepted the Affected Party's claim for statutory blight and the process for agreeing the terms of acquisition of the Affected Party's property continue.</p>	

	Objector	Plots	Work Number	Applicant's case for acquisition	Document references
7	Mr Ian Mahoney	Permanent acquisition of all interests in land: 5/9a – subsoil, 5/26a	Permanent acquisition of all interests in land: 10, 12(a), U30, U31.	<p>Part of Mr Mahoney's land is required for a temporary WCH and utilities bridge parallel to Station Road Hatfield Peverel.</p> <p>The Applicant believes there is a compelling case in the public interest for the powers sought that justifies the interference with Mr Mahoney's property. The provision of the temporary works that require possession of Mr Mahoney's land will facilitate temporary access for non-motorised used when Station Road, Hatfield Peverel is being reconstructed, and will provide continued utilities connections for this part of Hatfield Peverel.</p> <p>The Applicant continues to liaise with Mr Mahoney regarding the practical arrangements for reducing the</p>	<ul style="list-style-type: none"> • RR-042 • Applicant's Response to Relevant Representations - Rev 2 [REP1-002] at page 395 to 399 • Applicant's Comments on Information received at Deadline 3 - Rev 1' [REP4-056] at page 94 to 98 • Written submission of oral case for Compulsory Acquisition Hearing 1 [REP3-014] at page 48 to 50 • Written submission of oral case for Compulsory Acquisition Hearing 3 [REP7-044] at page 28 to 39 • Applicant's Comments on information received at Deadline 1' [REP2-030] at page 27

	Objector	Plots	Work Number	Applicant's case for acquisition	Document references
				<p>impacts of the proposed scheme on his land.</p> <p>The Applicant's Response to Relevant Representations' [REP1-002], 'Applicant's Comments on information received at Deadline 1' [REP2-030] and 'Applicant's Comments on Information received at Deadline 3 - Rev 1' [REP4-056].</p>	
8	Mark David Cathcart	<p>Land to be used temporarily and new rights to be acquired permanently:</p> <p>8/52c, 8/53a – subsoil</p>	<p>Land to be used temporarily and new rights to be acquired permanently:</p> <p>U69</p>	<p>The Applicant requires the acquisition of these plots for the diversion of the gas pipeline.</p> <p>The Applicant is working with Cadent to resolve, to the extent it can, the concerns raised by Mr Cathcart but submits that there is a clear and compelling case for the new rights sought to allow for the diversion of the gas pipeline through Mr Cathcart's land to permit the widening of</p>	<ul style="list-style-type: none"> • RR-106 • Applicant's Response to Relevant Representations - Rev 2 [REP1-002] at page 756 to 760 • 'The Applicant's Comments on Written Representations' [REP3-009] at page 233 to 265 • Applicant's Comments on Information received at Deadline 5

	Objector	Plots	Work Number	Applicant's case for acquisition	Document references
				<p>the A12 in the vicinity of the River Brain.</p> <p>The Applicant's Response to Relevant Representations' [REP1-002] and 'The Applicant's Comments on Written Representations' [REP3-009].</p>	<p>[REP6-090] at page 219</p> <ul style="list-style-type: none"> • Applicant's Comments on information received at Deadline 1' [REP2-030] at page 30 • Applicant's Comments on Information received at Deadline 2 [REP3-015] at page 11 to 13
9	Mr and Mrs Lindsay	<p>Category 1: 14/19a – subsoil</p> <p>Category 2: 14/13a, 14/15a</p>	<p>Category 1: 45(a), 45(b), 69(b), 70, 74(c), 116, 122, U137, U140, U143, U144, U145, U145A, U146, U146A, U146B, U146C, U147, U147A, U147B, U147C, U154, T39</p>	<p>Mr and Mrs Lindsay's property is not included in the Applicant's land plans and book of reference for acquisition, but their interest is noted in neighbouring plots.</p> <p>These include the presumed interest in the subsoil to the highway their property has a frontage with and also in respect of the potential benefit of historic covenants over</p>	<ul style="list-style-type: none"> • (John C) RR-103 • (John A) RR-194 • (Mary A) RR-195 • Applicant's Response to Relevant Representations - Rev 2 [REP1-002] at page 1158 to 1161 • Written Submissions of Oral Case for Compulsory Acquisition Hearing [REP3-014] at page 50 to 52

	Objector	Plots	Work Number	Applicant's case for acquisition	Document references
			<p>Category 2: 45(a), 45(b), 45(f), 67(b), 69(a), 69(b), U137, U140, U144, U149, U150, U154, T39, T44, T45, T46</p>	<p>neighbouring land that forms part of the Order land.</p> <p>The neighbouring plots are required for works in relation to the alteration of A12 including the demolition of Brick Kiln Farm, Junction 24 slip roads, access tracks, attenuation ponds, Inworth Roundabout, Inworth Road improvements, diversion of communication cables, electricity cables, water mains, a raw water main and a sewer and haul roads.</p> <p>The Lindsays have expressed concerns regarding the physical implementation of the works in the vicinity of their property, including the proximity of a construction haul road and compound.</p> <p>The Applicant has liaised with the Lindsays regarding the potential discretionary</p>	<ul style="list-style-type: none"> • Applicant's written submission of oral case at CAH2 [REP5-022] at page 15; 21 to 22 • Applicant's written submission of oral case at CAH3 [REP7-044] at page 26 to 34 • Applicant's Comments on Information received at Deadline 5 [REP6-090] at page 211 to 215 • The Applicant's Comments on Written Representations' [REP3-009] at page 365 • Applicant's Comments on information received at Deadline 1' [REP2-030] at page 42 to 47 • Applicant's Comments on Information received at Deadline 2 [REP3-015] at page 16

	Objector	Plots	Work Number	Applicant's case for acquisition	Document references
				<p>purchase of the Lindsay's property and whether assurances sought by the Lindsays can be given by the Applicant. The Applicant believes it has given the support and assurances it can at this stage in the design of the scheme and will continue to liaise with the Lindsays as detailed design progresses.</p> <p>The Applicant responded to the Lindsays representations [REP2-077] in 'The Applicant's Response to Relevant Representations' [REP1-002] and during CAH1 [REP3-014] and CAH2 [REP5-022].</p>	<ul style="list-style-type: none"> Applicant's Comments on Information received at Deadline 3 [REP4-056] at page 108 to 110

	Objector	Plots	Work Number	Applicant's case for acquisition	Document references
10	<p>Robert Alexander Buchanan, Harry Christopher Buchanan and Elizabeth Anne Buchanan</p> <p>Strutt & Parker on behalf of The Executors of Eileen Elizabeth Buchanan</p>	<p>Permanent acquisition of all interests in land: 8/43a, 8/43d, 8/43e, 8/43f, 8/43g, 8/44a, 8/44c</p> <p>Land to be used temporarily and new rights to be acquired permanently: 8/43b, 8/43c, 8/49a, 8/49b, 8/44b, 8/49a, 8/49b</p>	<p>Permanent acquisition of all interests in land:</p> <p>12(c), 24(d), 28(b), U22A, U49, U50A, U51, U64, U68, U69, T23.</p> <p>Land to be used temporarily and new rights to be acquired permanently:</p> <p>24(e), U22A, U49, U51, U62A, U64, U68, U69, T23.</p>	<p>The Applicant seeks to acquire these plots and new rights for works in connection with the widening of the A12 including the demolition of Woodend Bridge, widening of Benton Bridge, diversion of communication cables, a surface water drain, a gas pipeline, haul road, replacement land and access track.</p> <p>The Applicant requires an access to its proposed attenuation pond and, without agreement for the necessary rights to construct, use and maintain that access the Applicant must secure the freehold of the land identified to effect and maintain that access. Freehold acquisition is proposed for the existing drainage ditch as permanent</p>	<ul style="list-style-type: none"> • RR-009 • Applicant's Response to Relevant Representations - Rev 2 [REP1-002] at page 151 to 152 • Applicant's Comments on Written Representations [REP3-009] at page 404 to 406 • Applicant's written submission of oral case at CAH3 [REP7-044] at page 37 to 38

	Objector	Plots	Work Number	Applicant's case for acquisition	Document references
				<p>physical modifications to the land are required.</p> <p>The Affected Parties' principal submissions were made in their relevant representation [RR-009]. The representations relate to the nature and extent of the proposed acquisition. A brief oral representation was made at Compulsory Acquisition Hearing 3 regarding an update on detailed design for the installation of a new gas pipeline in the Affected Parties' land.</p> <p>The Applicant maintains its case that there is a compelling need for the powers sought in the dDCO on the basis the works are required for the scheme to proceed. The nature of acquisition is appropriate given the physical changes to</p>	

	Objector	Plots	Work Number	Applicant's case for acquisition	Document references
				<p>the land required for the proposed scheme to proceed.</p> <p>The Applicant relies on its Response to Relevant Representations' [REP1-002] at page 151 to 152, Comments on Written Representations [REP3-009] at page 404 to 406 and written submission of oral case at CAH3 [REP7-044] at page 37 to 38.</p>	
11	Lynfield Properties Limited	<p>[none]</p> <p>Co-Op PFS, Balgores Bodyshop, Regatta Garden Furniture and Robinsons Recycling at the gateway to Witham, CM8 1ED</p>		<p>The Applicant is not proposing to acquire land or rights over the Affected Party's land.</p> <p>The Affected Party made representations at Compulsory Acquisition Hearing 2 in addition to its relevant representations and written submissions at Deadline 5 (see REP5-039).</p>	<ul style="list-style-type: none"> • Applicant's Comments on Information received at Deadline 5 [REP6-090] at page 151 to 166 • The Applicant's Comments on Written Representations' [REP3-009] at page 231 to 233 • Applicant's Comments on information received at Deadline 1' [REP2-030] at page 29

	Objector	Plots	Work Number	Applicant's case for acquisition	Document references
				<p>The Applicant relies in particular on its responses to the Deadline 5 Representations at page 151 on of REP6-090.</p> <p>The Applicant believes that the stopping-up of the existing northbound Junction 21 on slip road is justified and maintains that the proposed HGV egress from the site is geometrically appropriate.</p>	<ul style="list-style-type: none"> Applicant's Comments on Information received at Deadline 3 [REP4-056] at page 116 to 118
12	Prested Hall/Pegasus (Prested) Investment	<p>Land to be acquired permanently: 15/13a, 15/13c</p> <p>Land to be used temporarily and new rights to be acquired permanently: 15/13b, 15/3e, 15/14a</p>	<p>Land to be acquired permanently: 87(a)</p> <p>Land to be used temporarily and new rights to be acquired permanently: 82(a), 82(b), 82(c), 82(d),</p>	<p>The main A12 carriageway will be moved south and cross the existing access road to Prested Hall. A new access is required to connect the local road network, to the north of the A12, with Prested Hall located to the south of the proposed A12. The new route also provides connectivity for the public rights of way network and replaces the movements which are</p>	<ul style="list-style-type: none"> RR-034 Applicant's Response to Relevant Representations - Rev 2 [REP1-002] at page 343 to 345 Outline Construction Traffic Management Plan [REP2-003] Written Submissions of Oral Case for Compulsory Acquisition Hearing

	Objector	Plots	Work Number	Applicant's case for acquisition	Document references
			82(e), 82(f), 85(b), U149, U150, U152, U154, U155, U157, U158, U160, U161, U162, U163, U164, U165.	<p>currently provided by Threshelfords Bridge, which is due to be demolished as part of the proposed scheme. The Applicant considers that the proposed access balances these different demands.</p> <p>The Applicant does not consider that access would significantly worsen as a result of the proposed scheme. The construction phasing is being developed to maintain access to Prested Hall as far as possible, see the Outline Construction Traffic Management Plan (OCTMP) [REP2-003] Sections 2.11.3 and 9.21. There would be, on limited occasions, activities such as the tie in points to the new Prested Hall access where access may need to be managed and may cause some disruption. The Applicant will continue to</p>	<p>[REP3-014] at page 71 to 75</p> <ul style="list-style-type: none"> • Applicant's written submission of oral case at CAH2 [REP5-022] at page 15 to 17; 25 to 27 • The Applicant's Comments on Written Representations' [REP3-009] at page 355 to 360 • Applicant's Comments on Information received at Deadline 2 [REP3-015] at page 104 to 109 • Applicant's Comments on Information received at Deadline 3 [REP4-056] at page 203 to 223

	Objector	Plots	Work Number	Applicant's case for acquisition	Document references
				liaise with the Interested Parties.	
13	Royal London UK Real Estate Fund and Edmundson Electrical Limited	<p>Land to be used temporarily and new rights to be acquired permanently: 1/10a, 1/10b, 1/10c</p> <p>Land to be used temporarily: 1/10f, 1/10g, 1/16a</p>	<p>Land to be used temporarily and new rights to be acquired permanently: 1(a), U2, U2A.</p> <p>Land to be used Temporarily U2</p>	<p>The Applicant intends to use the land over which temporary powers are sought for access to works to a gas pipeline and electricity cables on neighbouring land. Permanent new rights are sought over plot 1/10c for the utility diversion works.</p> <p>Plots 1/10a and 1/10b are proposed to be subject to new rights to allow for the maintenance of culverts under the A12 carriageway.</p> <p>Land is required temporarily for access and working room for utility diversion works.</p> <p>The Affected Parties have made representations at each Compulsory Acquisition Hearing and argue there is no compelling case for the</p>	<ul style="list-style-type: none"> • RR-032 • Applicant's Response to Relevant Representations - Rev 2 [REP1-002] at page 331 to 341 Hearings [REP3-077] • The Applicant's Comments on Written Representations' [REP3-009] at page 370 to 376 • Written Submissions of Oral Case for Compulsory Acquisition Hearing [REP3-014] at page 76 to 82 • Applicant's written submission of oral case at CAH2 [REP5-022] at page 15 to 18; 28 to 30

	Objector	Plots	Work Number	Applicant's case for acquisition	Document references
				<p>temporary powers sought over the car park and service areas of the relevant land nor any compelling case for the new rights sought for the provision of maintenance easements for culverts under the A12 nor for the diversion of the existing gas pipeline and overhead electricity power cables.</p> <p>They have also submitted that alternative temporary access routes exist and that the proposed temporary access route is inadequate for its intended purpose. The impact on the occupier's business is also a ground of objection.</p> <p>The Applicant has considered, and responded to, all of the suggested alternative proposals for access - see the Applicant's comments on the response to 2.5.14 in the Applicant's</p>	<ul style="list-style-type: none"> • Applicant's written submission of oral case at CAH3 [REP7-044] at page 24 to 26 • Applicant's Comments on Information received at Deadline 3 [REP4-056] at page 223 to 238 • Applicant's Comments on Other's Responses to ExQ3 [REP7-046] at page 28 to 30

	Objector	Plots	Work Number	Applicant's case for acquisition	Document references
				<p>Comments on Others' Responses to ExQ2 [REP5-003].</p> <p>The Applicant does not believe there is a better route for access to the utility diversion works than the one proposed in the Application and believes the level of disruption caused by the temporary access over the affected hardstanding, compound and parking area is justified in the public interest, given the case of the A12 Scheme and the disruption to the wider public that would be caused by providing access direct from the A12.</p> <p>Access from the A12 would require traffic management and single lane running on the A12, which for safety reasons and to avoid traffic weaving would need to extend into the</p>	

	Objector	Plots	Work Number	Applicant's case for acquisition	Document references
				<p>exit slip road, reducing its capacity. This would consequentially cause disruption to J19.</p> <p>It is not practicable to access the diversionary works via the adjacent Cadent Above Ground installation site due to the gas pipelines and infrastructure as well as cables that are at shallow depth and could not take the loading of construction vehicles.</p> <p>The compelling need for the proposed works and the powers to carry out those works is set out in the Applicant's Written Submission of Oral Case for Compulsory Acquisition Hearing 2 at 8.11 [REP5-022]. The Applicant has shown a compelling case for the powers sought and that there is no better alternative to the</p>	

	Objector	Plots	Work Number	Applicant's case for acquisition	Document references
				<p>powers proposed. The Applicant will continue to liaise with the Affected Parties and the compensation code will apply.</p> <p>The Applicant's Response to Relevant Representations' [REP1-002] and 'The Applicant's Comments on Written Representations' [REP3-009] explains these points in detail.</p>	
14	CMS LLP on behalf of Legal and General Investment (Pensions Management Limited)	<p>Permanent acquisition of all interests in land: 10/12a, 10/12b</p> <p>Land to be used temporarily: 10/12c 10/12d, 10/12e</p>	<p>Permanent acquisition of all interests in land: 32(c), U77, U81, U83, U85, U85A, U85B, U91.</p> <p>Land to be used Temporarily 32(c), U85, U85A, U85B</p>	<p>The permanent acquisition of plots 10/12a and 10/12b is required to</p> <p>enable the proposed alteration works to widen the existing footpath on Eastways as well as to accommodate associated utility works (diversion of communication cables, gas pipeline, water mains and foul water) within the verge. The permanent land take consists of the</p>	<ul style="list-style-type: none"> • RR-035 • Applicant's Response to Relevant Representations - Rev 2 [REP1-002] at page 345 to 347 • Applicant's Comments on Written Representations' [REP3-009] at page 224 to 228 • Applicant's Comments on Other's Responses

	Objector	Plots	Work Number	Applicant's case for acquisition	Document references
				<p>grass verge up to the back of the parking bays.</p> <p>Land is required temporarily as a temporary diversion of a PRow, access and working room for utility diversion works.</p> <p>The Applicant maintains its case that there is a compelling need for the powers sought in the dDCO and the nature of acquisition is appropriate given the physical changes to the land required for the proposed scheme to proceed.</p> <p>The Applicant's Response to Relevant Representations' [REP1-002] and 'The Applicant's Comments on Written Representations' [REP3-009].</p> <p>In their respective responses to ExQ3.5.1 submitted at</p>	<p>to ExQ3 [REP7-046] at page 27 to 28</p>

	Objector	Plots	Work Number	Applicant's case for acquisition	Document references
				<p>Deadline 6 the parties confirmed that discussions continue for the resolution of the required temporary possession of the relevant land at Eastways Business Park in Witham so as to minimise the impact on tenants and operations on the Estate. Heads of Terms have been substantially agreed between the parties. The Applicant believes it will be possible to secure agreement as the concerns of the Affected Party have been accommodated.</p> <p>The Applicant will continue to work with the Affected Party.</p>	
15	Countryside Zest (Beaulieu Park) LLP	Permanent acquisition of all interests in land: 2/14a, 2/14b, 2/15a	Permanent acquisition of all interests in land	Representations have been made in respect of the proposed acquisition of land for the new Paynes Lane Bridge to be provided by the Applicant across the A12 and	<ul style="list-style-type: none"> • AS-033 • Applicant's Response to Relevant Representations - Rev 2 [REP1-002] at page 404 to 405

	Objector	Plots	Work Number	Applicant's case for acquisition	Document references
		<p>Land to be used temporarily and new rights to be acquired permanently: 2/15c</p> <p>Land to be used temporarily: 2/15b 2/15f, 2/15g</p>	<p>1(g), 1(j), 1(l), 5, 6(a), 6(b), U10A, U10C, U11, U12, T4, T5.</p> <p>Land to be used temporarily and new rights to be acquired permanently: 1(a), 1(c), T5.</p> <p>Land to be used Temporarily 5, T5</p>	<p>the Great Eastern Main Line Railway north of Junction 19 at Boreham, ecology mitigation, attenuation pond and access track. The objection is focused on the impacts of the Applicant's proposals on the owner's consented development known as Beaulieu Park, and the associated new railway station.</p> <p>The land is required temporarily as a haul road of approximately 600 metres in length west of the northern abutment of the proposed Paynes Lane Bridge , north of junction 19 of the A12 and temporary storage, laydown areas, access and working space to facilitate the construction of Paynes Lane Bridge.</p> <p>The Applicant has worked with Essex County Council,</p>	<ul style="list-style-type: none"> • Applicant's Comments on Written Representations' [REP3-009] at page 82 to 85 • Applicant's written submission of oral case at CAH3 [REP7-044] at page 6 • Applicant's Comments on Other's Responses to ExQ3 [REP7-046] at page 46 to 48

	Objector	Plots	Work Number	Applicant's case for acquisition	Document references
				<p>Chelmsford City Council and the Affected Party to amend the scheme design for the Paynes Lane Bridge so that the bridge approach is directed towards the new railway station.</p> <p>The Applicant has settled Heads of Terms with the owner and has issued a letter of assurance. The Applicant understands that its letter of assurance is sufficient for the withdrawal of representations that have been made and has seen a letter dated 11 July 2023 from the Owner's agent to the Planning Inspectorate confirming this.</p> <p>The Applicant believes it will be possible to secure an agreed solution to the owner's concerns and that in any event the scheme's proposals</p>	

	Objector	Plots	Work Number	Applicant's case for acquisition	Document references
				<p>will complement the Beaulieu Park scheme and improve connectivity between Beaulieu Park and Boreham.</p> <p>The Applicant addressed the issues raised in its Response to Relevant Representations' [REP1-002] and 'The Applicant's Comments on Written Representations' [REP3-009].</p>	
16	Gerrard Robert Bibbey and Jayne Marie Bibbey	<p>Permanent acquisition of all interests in land:</p> <p>9/16a, 9/16b, 9/22a, 9/22b, 10/6a, 10/7a</p>	<p>Permanent acquisition of all interests in land:</p> <p>12(c), 24(a), 24(b), 30A, 35(a), 36, U51, U74, U75, T26.</p>	<p>The Applicant seeks to acquire these plots in relation to the widening of the A12 and Junction 24 slip road as well as attenuation ponds and diversion of utilities.</p> <p>The Affected Parties objected mainly on the grounds that the new public right of way and boundary treatment</p>	<ul style="list-style-type: none"> • AS-033 • Applicant's Response to Relevant Representations - Rev 2 [REP1-002] at page 357 to 360 • Applicant's Comments on Written Representations' [REP3-009] at page 350 to 355

	Objector	Plots	Work Number	Applicant's case for acquisition	Document references
				<p>would impact in their fishery business.</p> <p>The Applicant's compelling case for the acquisition of the plots in its Response to Relevant Representations' [REP1-002] and 'The Applicant's Comments on Written Representations' [REP3-009]. The position was updated in REP6-089, at Q3.8.3 to reflect the proposed rerouting of the footpath diversion.</p> <p>The Applicant has now rerouted the diversion for the public footpath to run parallel to the A12 south to the River Brain at Whetmead.</p>	<ul style="list-style-type: none"> • [REP6-089] Q3.8.3
17	Essex County Fire & Rescue Service	Permanent acquisition of all interests in land: 11/14a, 11/14b, 12/6a, 12/6c, 12/6d, 12/7a	Permanent acquisition of all interests in land: 24(g), 41(b), 41(c), 52, U111A, U111B,	The Applicant seeks to acquire these plots to provide an access track, a footpath diversion, utilities diversion, temporary carriageway and a	<ul style="list-style-type: none"> • RR-66 • Applicant's Response to Relevant Representations - Rev 2 [REP1-002] at page 348 to 352

	Objector	Plots	Work Number	Applicant's case for acquisition	Document references
		<p>Land to be used temporarily and new rights to be acquired permanently: 11/14c, 12/6f</p> <p>Land to be used temporarily: 12/6b, 12/6e</p>	<p>U111C, U130, U132, U137, U140, T33.</p> <p>Land to be used temporarily and new rights to be acquired permanently: U111A, U111B</p> <p>Land to be used Temporarily 52, U111A, U111B</p>	<p>new Essex Fire and Rescue Access Road.</p> <p>The land is required temporarily as construction material storage, construction access, laydown areas, welfare facilities, working area and storage of plant and for access / working room for the construction of an upgraded access into Essex County Fire & Rescue Centre. Access / working room for utility diversion works.</p> <p>The Applicant has responded to the points raised through the relevant representation, through the document submitted at Deadline 1 'The Applicant's Response to Relevant Representations' [REP1-002] and set out the compelling case in the public interest for requiring these</p>	

	Objector	Plots	Work Number	Applicant's case for acquisition	Document references
				works in the Affected Party's land.	
18	Victoria and Gary Woods	<p>Permanent acquisition of all interests in land: 6/15b</p> <p>Land to be used temporarily and new rights to be acquired permanently: 6/15c</p> <p>Land to be used temporarily: 6/15a 6/15d</p>	<p>Permanent acquisition of all interests in land: 12(a), 12(b), 14(a), 14(b), 18(b), U37, U37A, U38, U38A, U39, T14</p> <p>Land to be used temporarily and new rights to be acquired permanently: U38, U38A, U42</p> <p>Land to be used Temporarily T14</p>	<p>The Applicant seeks to acquire these plots and rights over them to divert an existing 11kV overhead electricity line that crosses the land and terminates on the eastern boundary of plot 6/15b shown on sheet 6 of the Land Plans [REP7-003] which would limit what development could take place immediately beneath and around it. The A12 scheme is proposing a minor diversion of the 11kV electricity line and to underground a section as there is not sufficient clearance to allow vehicles to pass beneath it.</p> <p>The land is required temporarily as a temporary road between junction 20b and junction 21.</p>	<ul style="list-style-type: none"> • The Applicant's Response to Relevant Representations' [REP1-002] at page 621 to 623 • The Applicant's Comments on Written Representations' [REP3-009] at page 349

	Objector	Plots	Work Number	Applicant's case for acquisition	Document references
				<p>The exact route and length to be undergrounded is subject to detailed design by UKPN in collaboration with the Applicant. There is a proposed medium pressure gas pipeline diversion that is likely to run through parcel 6/15c. The exact route is subject to detailed design by Cadent in collaboration with the Applicant. As this is a medium pressure gas distribution pipeline the easement width would be relatively small.</p> <p>The level of works and change to the land in this area requires the freehold acquisition of the land. However, once the works are complete, it may be possible to transfer the ownership of the newly constructed access beyond the extent of the final highway boundary to Mr and Mrs Woods, subject to any</p>	

	Objector	Plots	Work Number	Applicant's case for acquisition	Document references
				<p>necessary reservation of rights for utility companies or for access by other parties.</p> <p>The Applicant believes there is a compelling case for the powers sought and continues to liaise with the Affected Party regarding the practical arrangements for reducing the impacts of the proposed scheme on their land. The Applicant has set out their compelling case in the Applicant's Response to Relevant Representations' [REP1-002] and 'The Applicant's Comments on Written Representations' [REP3-009].</p>	
19	Patricia Jane Gooding and Josephine Roberta Ann Witten	Permanent acquisition of all interests in land: 7/6a – subsoil, 7/16d, 7/16f, 7/16h, 8/14a	Permanent acquisition of all interests in land: 12(c), 18(c), U44, U49, U51, U53, U54,	The Affected Parties objected to the proposed scheme together with a group of landowners of the development known as Gershwin Park.	<ul style="list-style-type: none"> • Relevant Representation by Strutt and Parker & Frazer Halls Associates on behalf of Gershwin Park Private Landowners - [RR-080]

	Objector	Plots	Work Number	Applicant's case for acquisition	Document references
		<p>Land to be used temporarily and new rights to be acquired permanently: 7/16e</p> <p>Land to be used temporarily: 7/8a, 7/8b, 7/8c, 7/16a, 7/16b, 7/16c 7/16g</p>	<p>U55, U56, U58, U22A</p> <p>Land to be used temporarily and new rights to be acquired permanently: U54</p> <p>Land to be used Temporarily 12(c), T22, U44, U54, U56</p>	<p>The Applicant seeks to acquire these plots for works in relation to the widening of the A12, realignment of Witham Link Road, diversion of buried communications cable ducts and utilities.</p> <p>Land is required temporarily for temporary traffic management, diversion of buried communications cable ducts and electricity cable ducts.</p> <p>The Applicant believes there is a compelling case for the powers sought and continues to liaise with the Affected Party regarding the practical arrangements for reducing the impacts of the proposed scheme on their land. The Applicant has set out their compelling case in the Applicant's Response to Relevant Representations' [REP1-002] and 'The</p>	<ul style="list-style-type: none"> • Applicant's Response to Relevant Representations (Rev 2) - [REP1-002] at page 617 • Applicant's Comments on Written Representations at Deadline 3 - [REP3-009] at page 418 to 419 • Replacement Land Statement [REP6-056] • Applicant's Written summary or oral case for CAH3.[REP7-044]

	Objector	Plots	Work Number	Applicant's case for acquisition	Document references
				Applicant's Comments on Written Representations' [REP3-009].	
20	Ulting Overseas Trust	<p>Permanent acquisition of all interests in land: 6/18c, 6/30a</p> <p>Land to be used temporarily and new rights to be acquired permanently: 6/18a, 6/18e</p> <p>Land to be used temporarily: 6/18b 6/18d, 6/18f</p>	<p>Permanent acquisition of all interests in land: 12(a), 12(b), 18(a), 18(d), 18(f), 22A, 23(a), 23(b), U22A, U38, U39, U45, U46, U48, U49, T15, T20</p> <p>Land to be used temporarily and new rights to be acquired permanently: U22A, U35, U38, U39, U45, U49, T15</p>	<p>The Applicant seeks to acquire these plots to carry out works in relation to the A12 carriageway, Junction 21 slip roads and roundabout, Junction 21 realigned access, Junction 21 cycle track, Junction 21, field access track, diversion of overhead cables and utilities, temporary road and haul road.</p> <p>The Applicant has responded to the points raised through the relevant representation and written representation through the documents submitted at Deadline 1 and Deadline 3 respectively, 'The Applicant's Response to Relevant Representations' [REP1-002] and 'The Applicant's Comments on</p>	<ul style="list-style-type: none"> • Relevant Representations made by Ulting Overseas Trust - [RR-012] • Applicant's Response to Relevant Representations (Rev 2) - [REP1-002] at page 200 • Applicant's Comments on Written Representations at Deadline 3 - [REP3-009] at page 431 to 433

	Objector	Plots	Work Number	Applicant's case for acquisition	Document references
			<p>Land to be used Temporarily</p> <p>12(b), 18(a), 23(a), 23(b), T15</p>	Written Representations' [REP3-009] and established its compelling case for the powers sought.	
21	<p>Daniel Ronald West, Gavin Andrew West, Sara Elizabeth Forbes and Katie Joanne Piper</p> <p>Elizabeth Susan West, Jack Daniel West, and Daniel Ronald West (as trustees of the R.F. West Discretionary Trust)</p>	<p>Permanent acquisition of all interests in land: 17/7a, 18/6b, 18/7a, 18/8a, 18/18a, 18/1w</p> <p>Land to be used temporarily and new rights to be acquired permanently: 18/6c 18/6f, 18/6g, 18/6h, 18/9a, 18/1x</p>	<p>Permanent acquisition of all interests in land: 68(a), 68(b), 93(a), 93(b), 94(a), 94(b), 94(c), 94(d), 95, 96(a), 96(b), 97, 100, 101, 102(a), 102(b), 102(c), 105(a), 105(b), 105(c), 106, 107, 108, U174A, U175, U176, U177, U178, U179, U180, U180A, U181, U182, 183, U184, U187,</p>	<p>The Applicant seeks to acquire these plots for the alteration of the A12 main line, Junction 25 slip road, works required for Hall Chase Road and Roundabout, attenuation pond, diversion of utilities and cables.</p> <p>Land is required temporarily for the construction of Potts Green Bridge and the construction of Ponds and western connection compound.</p> <p>Where physical works to the existing condition of the surface of land are required and/or there is an ongoing need for the Applicant to hold</p>	<ul style="list-style-type: none"> • The West Family's Deadline 2 Submission – Written Representations and summaries - [REP2-129] • Applicant's Comments on Written Representations at Deadline 3 - [REP3-009] at page 433 to 438 • Drainage and Surface Water Plans – part 2 - [REP6-031]

	Objector	Plots	Work Number	Applicant's case for acquisition	Document references
		<p>Land to be used temporarily: 18/6a 18/6d, 18/6e, 18/6i 18/8a, 18/18b</p>	<p>U193, U193A, U194, U195, U196, U197, U202, U207, T50, T51, T52</p> <p>Land to be used temporarily and new rights to be acquired permanently:</p> <p>U178, U180, U180A, U194, U197</p> <p>Land to be used Temporarily</p> <p>68(a), 68(b), 100, 101, 102(c), T52</p>	<p>the land for purposes of access for operational requirements and future inspections and maintenance, freehold powers have been sought.</p> <p>The proposed attenuation pond (S3-OU15A) as shown on Drainage and Surface Water Plans – Part 2, Sheet 18 of 21 [REP6-031] is required in this location to mitigate the increased rates of runoff from the proposed scheme by storing the increased runoff that would result from the proposed highway improvement works in the vicinity of Junction 25. To ensure the proposed attenuation pond remains functional, the Applicant needs to hold the land for access for operational requirements and to undertake regular inspections and routine maintenance (e.g.</p>	

	Objector	Plots	Work Number	Applicant's case for acquisition	Document references
				<p>clearing of any sediment accumulation at inlets/outlets to the attenuation pond, grass cutting and vegetation control including any necessary repairs, etc.) of the proposed attenuation pond and associated inlet/outlet pipework and outfall structure over the lifetime of the proposed scheme.</p> <p>The Applicant believes that there is a compelling case for the powers sought and has responded to the points raised through the written representation through the documents submitted at Deadline 3 'The Applicant's Comments on Written Representations' [REP3-009].</p>	
22	Michael Mott and Samantha Jane Mott	Permanent acquisition of all interests in land: 8/40a – subsoil	Permanent acquisition of all interests in land:	The Applicant seeks to acquire these plots to divert a high-pressure gas pipeline	<ul style="list-style-type: none"> • Samantha Mott's Deadline 2 submission – Other: Impact on property Ullswater

	Objector	Plots	Work Number	Applicant's case for acquisition	Document references
		<p>Land to be used temporarily and new rights to be acquired permanently: 8/39a</p>	<p>29(a)</p> <p>Land to be used temporarily and new rights to be acquired permanently: U69</p>	<p>and for attenuation pond and outfall.</p> <p>Land is required temporarily as a construction material storage, construction access, laydown areas, welfare facilities, working area and storage of plant and for temporary storage, laydown areas, access and working space to facilitate the construction of Paynes Lane Bridge.</p> <p>A portion of the Affected Party's land shown by plot 8/39a on the Land Plans [REP7-003] forms part of the gas main corridor in this location.</p> <p>The Applicant believes that there is a compelling case for the powers sought and has responded to the points raised through the Deadline 2 submission, through the</p>	<p>Maldon Road - [REP2-109]</p> <ul style="list-style-type: none"> • Applicant's Commons on information received at Deadline 2 - [REP3-015] at page 116 • Applicant's Comments on Information received at Deadline 2 [REP3-015] at page 116

	Objector	Plots	Work Number	Applicant's case for acquisition	Document references
				document submitted at deadline 3, 'Applicant's Comments on Information received at Deadline 2' [REP3-015].	
23	Network Rail Infrastructure Limited	<p>Permanent acquisition of all interests in land:</p> <p>2/17a, 2/17g, 2/17l, 2/17m, 2/17p, 2/18b, 19/8a</p> <p>Land to be used temporarily and new rights to be acquired permanently:</p> <p>2/17j, 2/18d, 19/11a, 19/11b, 19/12a, 19/12b, 19/12c</p>	<p>Permanent acquisition of all interests in land:</p> <p>1(c), 1(a), 5, U11, T4, 68(b), 104, 112, U198</p> <p>Land to be used temporarily and new rights to be acquired permanently:</p> <p>1(a), 1(c), T5, U200A</p> <p>Air Rights</p> <p>5</p>	<p>The Applicant proposes a new bridge over the Great Eastern (GE) Main Line and acquisition of permanent airspace rights to support this, permanent acquisition of Network Rail rights which could restrict access to the GE Main Line (NR Interactions). Negotiations are underway to agree an Asset Protection Agreement for Paynes Lane Bridge. The Applicant also proposes to permanently acquire plot 2/15a, acquire permanent new rights over plot and 2/15c, and temporarily use plots, 2/15f, 2/15g and 2/15b (Beaulieu Plots)</p>	<ul style="list-style-type: none"> • Relevant Representation made by Network Rail Infrastructure Limited - [RR-045] • Applicant's Response to Relevant Representations (Rev 2) - [REP1-002] at page 406 to 409 • Applicant's Comments on Written Representations at Deadline 3 - [REP3-009] at page 343 to 348 • Written Submissions of Oral Case for Compulsory Acquisition Hearing

	Objector	Plots	Work Number	Applicant's case for acquisition	Document references
		<p>Air rights (for new Paynes Lane Bridge) 2/17e</p> <p>Land to be used temporarily: 2/17b 2/17h, 2/17k, 2/17n, 2/17o, 2/18a 2/18c</p> <p>Permanent acquisition of all interests in the subsoil: 2/17i</p> <p>Part 1 (Category 2) and Part 3</p> <p>Land to be used temporarily: 2/15b</p>	<p>Land to be used Temporarily: 1(a), 1(c), 2(b), 5</p> <p>Permanent acquisition of all interests in the subsoil: 1(a), 1(c), T5</p> <p>Part 1 (Category 2) and Part 3 Land to be used temporarily: 5, T5</p>	<p>In addition, permanent air rights are sought to provide for the construction and retention of a new bridge over the Great Eastern Main Line, north of junction 19, to be known as the Paynes Lane Bridge.</p> <p>The Applicant will not vest any part of 2/15a which forms part of the operational railway, or which is to be transferred to Network Rail or Essex CC. The Applicant will provide suitable access to Network Rail and ensure suitable notice and durations and confirm and agree any alternative routes in advance, through a weekly telecon with both parties. The Applicant continues discussions on a Framework Agreement which would be subject to Network Rail Clearance Process. Eleven Clearances are to be resubmitted following the</p>	<p>[REP3-014] at page 24 to 27</p> <ul style="list-style-type: none"> • Applicant's written submission of oral case at CAH2 [REP5-022] at page 5 to 9 • Applicant's written submission of oral case at CAH3 [REP7-044] at page 7 to 9; • Applicant's Comments on Information received at Deadline 3 [REP4-056] at page 198 to 203

	Objector	Plots	Work Number	Applicant's case for acquisition	Document references
				<p>reduction and removal of plots.</p> <p>The Applicant believes there is a compelling case for the powers sought and continues to liaise with the Affected Party regarding the practical arrangements for reducing the impacts of the proposed scheme on their land. The Applicant has set out their compelling case in the Applicant. The Applicant's Response to Relevant Representations' [REP1-002] and 'The Applicant's Comments on Written Representations' [REP3-009]</p>	
24	Anglian Water Services Limited and AWG Land Holdings Limited	<p>Part 1 (Category 1)</p> <p>Permanent acquisition of all interests in land:</p>	<p>Part 1 (Category 1)</p> <p>Permanent acquisition of all interests in land:</p>	<p>The Applicant seeks to acquire the land for works in relation to the widening of the existing A12 carriageway, utility diversion, realigned New Lane, access track north of the existing A12 from new</p>	<ul style="list-style-type: none"> • Relevant Representation made by Anglian Water - [RR-054] • Applicant's Response to Relevant Representations (Rev

	Objector	Plots	Work Number	Applicant's case for acquisition	Document references
		<p>8/32b, 9/10b, 9/10c, 9/10d, 11/11b, 15/6a – subsoil, 9/12a.</p> <p>Land to be used temporarily and new rights to be acquired permanently:</p> <p>8/32a, 9/10a, 9/10e, 15/9a, 21/5a, 21/5b, 9/12b</p> <p>Land to be used temporarily:</p> <p>5/16a</p> <p>Part 1 (Category 2) and Part 3</p>	<p>12(c), 27A, 30A, U22A, U49, U50, U51, U64, U66, U67, T26, 82(d), 82(g), 83, U155, U156, U157, U158, U159</p> <p>Land to be used temporarily and new rights to be acquired permanently:</p> <p>U66, U67, U70, 12(c), 24(d), 45(a), 45(b), 74(a)</p> <p>Land to be used Temporarily:</p> <p>12(a), U23, U25</p> <p>Part 1 (Category 2) and Part 3</p>	<p>Feering East roundabout, construction of new public footpath (78_12).</p> <p>New rights are required for the diversion of utilities and cables and access and working room for DNO supply route.</p> <p>Land is required temporarily as a construction material storage, construction access, laydown areas, welfare facilities, working area and storage of plant and associated Utility Works.</p> <p>The Applicant seeks temporary possession of the access along Blackwater Lane. The Applicant has confirmed that the Affected Party's rights of access would not be affected.</p> <p>The Applicant has made provision in the Application for</p>	<p>2) - [REP1-002] at page 500 to 505</p> <ul style="list-style-type: none"> • Anglian Water Deadline 2 Submission -Written Responses and summaries - [REP2-037] • Applicant's Comments on Written Representations at Deadline 3 - [REP3-009] at page 12 to 16 • Statement of Common Ground with Anglian Water at Deadline 7 - [REP7-033] • Applicant's written submission of oral case at CAH2 [REP5-022] at page 5 to 7 • Applicant's written submission of oral case at CAH3 [REP7-044] at page 7 to 11 • Applicant's Comments on Information

	Objector	Plots	Work Number	Applicant's case for acquisition	Document references
		<p>Permanent acquisition of all interests in land: 5/1b, 5/36c, 8/1h, 8/1i, 8/1k, 8/47a, 9/11a, 11/10a, 11/20b, 12/14b, 15/8i, 15/8j, 8/32b, 9/10b, 9/10c, 9/10d.</p> <p>Land to be used temporarily and new rights to be acquired permanently: 8/6l, 8/47b, 8/47h, 8/47q, 8/68e, 8/68f, 9/11, 8/32a, 9/10a, 9/10e</p>	<p>Permanent acquisition of all interests in land: 8(b), 9, 11, 12(a), 12(c), 24(a), 24(d), 24(e), 24(g), 27A, 28(a), 30A, 37(e), 45(a), 50, 82(d), U22, U22A, U23, U24, U25, U27, U28, U35, U49, U50, U51, U64, U65, U66, U67, U70, U73, U117, U119, U137, U140, T26</p> <p>Land to be used temporarily and new rights to be acquired permanently: 12(c), 24(d), 24(e), U22A, U44, U49, U51,</p>	<p>replacement land for Anglian Water, which will include a connection for nature conservation purposes to land owned by Witham Town Council.</p> <p>The Applicant believes there is a compelling case for the powers sought and continues to liaise with the Affected Party regarding the practical arrangements for reducing the impacts of the proposed scheme on their land. The Applicant has set out their compelling case in the Applicant's Response to Relevant Representations' [REP1-002] and 'The Applicant's Comments on Written Representations' [REP3-009].</p>	<p>received at Deadline 5 [REP6-090] at page 7</p>

	Objector	Plots	Work Number	Applicant's case for acquisition	Document references
			U56, U64, U65, U66, U67, U70, U73, 24(e), T26		
25	Chelmsford City Council	<p>Part 1 (Category 1)</p> <p>Permanent acquisition of all interests in land: 1/4a, 1/7a, 2/3a</p> <p>Part 1 (Category 2) and Part 3</p> <p>Permanent acquisition of all interests in land: 1/6a, 2/4a, 2/11c, 2/11d</p> <p>Land to be used temporarily and new rights to be</p>	<p>Part 1 (Category 1)</p> <p>Permanent acquisition of all interests in land: 1(i)</p> <p>Part 1 (Category 2) and Part 3</p> <p>Permanent acquisition of all interests in land: 1(b), 1(e), 1(i)</p> <p>Land to be used temporarily and new rights to be</p>	<p>The Applicant seeks to acquire these plots in relation to works at Generals Lane Roundabout, rights of access for inspection maintenance and repair, diversion of utilities.</p> <p>Works such as the widening of Boreham Bridge and the realigning of the A138 may have an impact on the Affected Party's land.</p> <p>The Applicant responded to the points raised through the relevant representation at Deadline 1, in its Response to Relevant Representations [REP1-002]. The City Council has not pursued its objection subsequently and the Applicant replies on its</p>	<ul style="list-style-type: none"> • Relevant Representation made by Chelmsford City Council - [RR-079] • Applicants Response to Relevant Representations (Rev 2) - [REP1-002] at page 608 to 616 • Applicant's Comments on Information received at Deadline 5 [REP6-090] at page 19 to 23 • Applicant's Comments on Information received at Deadline 2 [REP3-015] at page 112 to 115 • Applicant's Comments on Information received at Deadline 3 [REP4-056] at page 23 to 34

	Objector	Plots	Work Number	Applicant's case for acquisition	Document references
		acquired permanently: 1/10a, 1/10b, 1/10c	acquired permanently: 1(a), U2, U2A	submissions made at Deadline 1. The Affected Party has put in a representation as a Statutory Consultee but has not made any representation on the land acquisition.	
26	Essex County Council	Part 1 (Category 1) Permanent acquisition of all interests in land: 1/2a, 1/2c, 1/4a, 1/6a, 1/7a, 1/8a, 1/9a, 2/2b, 2/2e, 2/2f, 2/2g, 2/2h, 2/2k, 2/2l, 2/2m, 2/3a, 2/4a, 2/6a, 2/8a, 2/8c, 2/9a, 4/2c, 4/7a, 5/2a, 5/2d, 5/2e, 5/2g, 5/2i, 5/2p, 5/2u, 5/2q, 5/2v, 5/3a, 5/5a, 5/5b, 5/7a,	Part 1 (Category 1) Permanent acquisition of all interests in land: 1(b), 1(c), 1(d), 1(e), 1(g), 1(h), 1(i), 1(k), 1(l), 2(b), 4, 6(a), 6(b), 7(b), 8(b), 9, 10, 11, 12(a), 12(b), 12(c), 13(b), 18(b), 18(c), 18(d), 18(f), 20, 21, 21A, 24(a), 24(b), 24(c),	The Applicant has responded to the points raised through the relevant representation and written representation at Deadline 1 and Deadline 3 respectively, 'The Applicant's Response to Relevant Representations' [REP1-002] and 'The Applicant's Comments on Written Representations' [REP3-009]. The majority of the plots listed compromise highway land, over which powers are sought to effect the works required for the proposed scheme, for which the Applicant requires the certainty of being able to	<ul style="list-style-type: none"> • Replacement Land Statement [REP6-056] • Applicant's Response to Relevant Representations (Rev 1) - [REP1-002] at page 269 to 285 • Written Submissions of Oral Case for Compulsory Acquisition Hearing [REP3-014] at page 36 to 44 • Applicant's written submission of oral case at CAH2 [REP5-022] at page 12; 15; and 20 to 21

	Objector	Plots	Work Number	Applicant's case for acquisition	Document references
		5/8a, 5/9a, 5/10a, 5/11a, 6/2a, 6/2b, 6/2c, 6/2d, 6/2e, 6/2f, 6/2g, 6/2h, 6/5a, 6/8a, 6/9a, 6/10a, 6/26a, 7/2a, 7/5a, 7/6a, 7/7a, 7/17d, 8/2b, 8/2e, 8/5a, 8/6f, 8/6h, 8/6i, 8/13b, 8/20a, 8/22a, 8/40a, 10/2a, 10/2b, 10/2c, 10/2d, 10/2e, 10/2f, 10/2g, 10/4a, 10/4b, 10/5e, 10/10a, 10/11a, 10/27a, 10/28a, 10/29a, 11/2b, 11/2c, 11/2d, 11/2e, 11/2f, 11/15a, 11/16a, 11/26a, 11/27a, 12/2a, 12/2b, 12/2d, 12/2e, 12/2f, 12/2g, 12/17a, 12/20a, 12/25a, 13/2a,	24(d), 24(g), 25, 27, 28(b), 29(a), 29(b), 30, 32(c), 32(d), 35(b), 37(a), 37(b), 37(c), 37(e), 39(c), 45(a), 45(b), 45(d), 45(f), 49, 50, 51(b), 52, 53, 54(b), 55(a), 55(b), 55(c), 56, 57, 60A, 61(b), 61(d), 63(b), 56, 63(b), 65(b), 68(a), 68(b), 69(b), 70, 74(c), 79(a), 82(a), 82(c), 82(d), 82(g), 83, 88(c), 88(d), 91(b), 91(c), 102(a), 103(a), 103(b), 104, 104A, 105(a), 105(b), 106, 110(b), 112, 113, 116, 119, 122, U3, U3A,	<p>deal with interests held by parties other than the local highway authority.</p> <p>Part of the land sought from the County Council is open space. Replacement land is proposed to be provided in exchange for the open space sought. See the Applicant's Replacement Land Statement [REP6-056]. The Statement of Common Ground between the parties [REP7-027] records at 2.37 the County Council agrees in principle to the offer of replacement land.</p>	<ul style="list-style-type: none"> • Applicant's written submission of oral case at CAH3 [REP7-044] at page 7 • Applicant's Comments on Information received at Deadline 5 [REP6-090] at page 49 to 119 • Applicant's Comments on information received at Deadline 1' [REP2-030] at page 8 • Applicant's Comments on Information received at Deadline 2 [REP3-015] at page 8 to 9 • Applicant's Comments on Information received at Deadline 3 [REP4-056] at page 34 to 72 • Statement of Common Ground [REP7-027] • Applicant's Comments on Other's Responses

	Objector	Plots	Work Number	Applicant's case for acquisition	Document references
		13/2b, 13/2c, 13/2e, 13/2f, 13/2g, 13/9a, 13/10a, 13/19a, 14/2a, 14/10a, 14/19a, 14/23a, 15/2a, 15/5a, 15/6a 16/2a, 16/4a, 16/9a, 18/2b, 18/2c, 18/2d, 18/5a, 18/5b, 18/5c, 18/19a, 18/21a, 19/2a, 19/2b, 19/2d, 19/2e, 19/2g, 19/2h, 19/2i, 19/5a, 19/7a, 19/7b, 19/7c, 19/8a, 19/9a, 19/22a, 20/1a, 20/11a, 20/12a, 20/12b. Land to be used temporarily and	U3B, U3C, U4, U5, U6, U7, U8, U10, U10A, U10C, U11, U12, U12A, U12B, U14, U15, U16, U17, U18, U19, U20, U20A, U21, U22, U22A, U27, U28, U29, U30, U31, U32, U33, U35, U36, U37, U37A, U38A, U40, U41, U44, U47, U48, U49, U50, U50A, U51, U55, U56, U57, U58, U60, U61, U62, U62A, U63, U63A, U64, U69, U71, U75, U77, U79, U81, U85, U85A, U85B, U91, U92, U93, U103, U104, U104A, U105, U116, U117, U118, U119,		to ExQ3 [REP7-046] at page 32, 48 to 50

	Objector	Plots	Work Number	Applicant's case for acquisition	Document references
		<p>new rights to be acquired permanently:</p> <p>7/4a, 8/3a, 8/6b, 8/6d, 8/6e, 8/6g, 8/6j, 8/6k, 8/6l, 8/6m, 8/10d, 8/21e, 8/21f, 8/21g, 8/35a, 10/11c, 10/11d, 10/22a, 14/8c, 19/2c, 19/6a, 19/10a</p> <p>Part 1 (Category 2) and Part 3</p> <p>Permanent acquisition of all interests in land:</p> <p>7/10i, 7/14a, 8/14a, 8/33a, 8/47o</p>	<p>U123, U124, U124A, U125, U126, U127, U128, U128A, U129, U134, U135, U137, U138, U139, U140, U143, U144, U145, U145A, U146, U146A, U146B, U146C, U147, U147A, U147B, U147C, U147D, U149, U150, U152, U153, U154, U155, U156, U157, U158, U159, U165, U167B, U168A, U173, U173A, U182, U185, U186, U186A, U187, U188, U189, U190, U191, U192, U193A, U195, U196,</p>		

	Objector	Plots	Work Number	Applicant's case for acquisition	Document references
		<p>Land to be used temporarily and new rights to be acquired permanently:</p> <p>1/10a, 1/10b, 1/10c, 7/10c, 7/10f, 8/47h, 8/68e, 8/68f</p> <p>Land to be used temporarily: 1/5a</p> <p>1/16a, 2/2a, 2/2i, 2/2j, 2/7b, 2/10a</p> <p>3/2a, 3/4a, 3/5a</p> <p>3/5b, 4/2a, 4/2b, 4/4a, 4/5a, 4/5b, 5/2b, 5/2c, 5/2f, 5/2h, 5/2j, 5/2k, 5/2l, 5/2m, 5/2n</p> <p>5/2o, 5/2r, 5/2s</p> <p>5/2t, 5/6a, 5/6c</p> <p>5/6d, 5/6e, 5/28a</p> <p>5/29a, 7/4b, 7/4c</p>	<p>U198, U199, U200A, U201, U202, U203, U204, U205, U206, U207, T2, T3, T10, T12, T23, T24, T26, T34, T35, T36, T37, T38, T39, T39, T48, T53</p> <p>Land to be used temporarily and new rights to be acquired permanently:</p> <p>12(c), 24(d), 24(e), 29(a), 74(c), U22A, U49, U50A, U51, U62A, U63, U63A, U64, U65, U68, U69, U71, U81, U84, U84A, U86, U91, U92,</p>		

	Objector	Plots	Work Number	Applicant's case for acquisition	Document references
		7/8a, 7/8b, 7/8c 7/12a, 7/17a, 7/17b 7/17c, 7/18a, 8/2a 8/2d, 8/7a, 8/8a 8/9a, 8/9b, 8/10a 8/10b, 8/10c, 8/13a 8/13c, 8/15a, 8/16a 8/21a, 8/21c, 8/21d 8/25d, 8/28a, 8/29a 8/42a, 9/4a, 9/5a 9/6a, 9/6b, 9/6c, 9/7a, 10/5a, 10/11b 11/2a, 11/24a, 11/24b, 12/2c, 12/19b, 12/19c	U146A, U200A, T23, T26 Part 1 (Category 2) and Part 3 Permanent acquisition of all interests in land: 12(c), 24(e), 27, 29(a), 29(b), U22A, U38A, U49, U50A, U51, U53, U54, U65, U69, U70, T23 Land to be used temporarily and new rights to be acquired permanently:		

	Objector	Plots	Work Number	Applicant's case for acquisition	Document references
		13/8b, 13/8c, 14/8a 15/4a, 15/4b, 18/2a 19/2f, 19/6b, 19/6c 20/2a, 21/1a	1(a), 12(c), 24(e), U2, U2A, U22A, U38A, U44, U49, U52, U56, U69, Land to be used temporarily: All Works, 1(i), 24(a), 24(b), 24(g), 37(a), 37(b), 37(c), 37(e), 44(b), U104A, U116, U117, U118, U119, T26, 1(e), 1(k), U21, U22, 9, 10, 12(a), 18(b), U22, U22A, U35, U27, U28, U36, U30, U31, U33, T10, T12, T9, 18(a), T11, 25, 29(a), 29(b), U44, U56, U54, 12(c), T22, 24(c),		

	Objector	Plots	Work Number	Applicant's case for acquisition	Document references
			U60, U61, U62, U51, U60, U62, U64, U71, T23, 27, T24, 12(c), 24(e), T25, U56, U76, U77, U81, U84A, U124A, U128, U128A, U123, U124, T32, T34, 67(b), 68(a)		
27	Witham Town Council	<p>Part 1 (Category 1)</p> <p>Permanent acquisition of all interests in land:</p> <p>8/47a, 8/47f, 8/47k, 8/47m, 8/47o, 8/47p, 9/11a</p> <p>Land to be used temporarily and new rights to be</p>	<p>Part 1 (Category 1)</p> <p>Permanent:</p> <p>12(c), 24(e), 27A, 28(a), 30A, U22A, U49, U51, U64, U65, U66, U67, U70, U73, T26</p> <p>Land to be used temporarily and new rights to be</p>	<p>The Applicant seeks to acquire these plots for Widening of A12 Carriageway</p> <ul style="list-style-type: none"> • Widening of Brain Bridge • Construction of private means of access • New Public Footpath • Diversion of buried communications cable ducts • Diversion of buried water mains 	<ul style="list-style-type: none"> • Applicant's Response to Relevant Representations (Rev 2) at Deadline 1 – [REP1-002] at page 626 to 633 • Written Submissions of Oral Case for Compulsory Acquisition Hearing [REP3-014] at page 36 to 41 • The Applicant's Comments on Written Representations'

	Objector	Plots	Work Number	Applicant's case for acquisition	Document references
		<p>acquired permanently: 8/27a, 8/47b, 8/47c, 8/47d, 8/47e, 8/47g, 8/47h, 8/47j, 8/47l, 8/47n, 8/47q, 9/11b</p> <p>Part 1 (Category 2) and Part 3</p> <p>Permanent acquisition of all interests in land: 8/1i, 8/1k</p> <p>Land to be used temporarily and new rights to be acquired permanently: 8/6l, 8/47h, 8/68e, 8/68f</p>	<p>acquired permanently: U22A, U44, U49, U51, U56, U64, U65, U66, U67, U70, U73, 12(c), 24(e), T25, T26</p> <p>Part 1 (Category 2) and Part 3</p> <p>Permanent acquisition of all interests in land: 12(c), 24(e), U22A, U49, U51, U64, U65,</p> <p>Land to be used temporarily and new rights to be acquired permanently:</p>	<ul style="list-style-type: none"> • Diversion of buried 11kV electricity cable ducts • Diversion or protection of a buried sewer pipe • Haul Road • New rights are required to divert utilities. <p>Land is required temporarily for a temporary bridge, access, storage, working room for construction.</p> <p>The Applicant responded to the points raised at Deadline 1, in its Response to Relevant Representations [REP1-002]. The Town Council has not pursued its objection subsequently and the Applicant RR-084 replies on its submissions made at Deadline 1.</p> <p>In addition, the Statement of Common Ground between the Applicant and Witham Town Council [REP7-031] at page</p>	<p>[REP3-009] at page 438 to 452</p> <ul style="list-style-type: none"> • Statement of Common Ground between the Applicant and Witham Town Council [REP7-031]

	Objector	Plots	Work Number	Applicant's case for acquisition	Document references
		Land to be used temporarily: 8/47i	U44, U65, 12(c), 24(e) Land to be used Temporarily 24(e), T25	11 records that the Town Council is content with the replacement land now proposed.	
28	Environment Agency	Permanent acquisition of all interests in land: 12/14b Land to be used temporarily: 12/14a	Permanent acquisition of all interests in land: 45(a), 50, U137, U140 Land to be used Temporarily: 45(a)	The Applicant seeks to acquire this land for works in relation to the alteration of the A12, to provide a new public footpath and for diversion of cables. Land is required temporarily for construction material storage, construction access, laydown areas, welfare facilities, working area and storage of plant. The Applicant responded to the points raised by the Environment Agency in its relevant representation and	<ul style="list-style-type: none"> • Relevant Representation made by Environment Agency - [RR-011] • Applicant's Response to Relevant Representations (Rev 2) at Deadline 1 – [REP1-002] at page 156 to 199 • Applicant's Comments on Information received at Deadline 5 [REP6-090] at page 42 to 49 • The Applicant's Comments on Written Representations'

	Objector	Plots	Work Number	Applicant's case for acquisition	Document references
				written representation through the documents submitted at Deadline 1 and Deadline 3 respectively, [REP1-002] and [REP3-009]. The Applicant and Affected Party have a public Statement of Common Ground [REP2-008]. The Environment Agency is maintaining an objection to the proposed scheme.	<p>[REP3-009] at page 106 to 171</p> <ul style="list-style-type: none"> Applicant's Comments on information received at Deadline 1' [REP2-030] at page 8
29	Tom Sawdon	<p>Permanent acquisition of all interests in land:</p> <p>13/12a, 13/12b</p>	<p>Permanent acquisition of all interests in land:</p> <p>45(a), 54(a), 55(a), U133, U134</p> <p>45(a), 50A, 61(b), 61(c), 63(b) U134, U137, U139 U134, T37</p>	At Deadline 1 the Interested Party suggested their concerns related to development aspirations for their land being impacted by the proposed scheme. The Applicant relies on its responses to that submission (response to REP1-069, P 81 of REP2-030). There is no access to the relevant land from the A12 (current or proposed) and any such development as is proposed by the Interested Party would	<ul style="list-style-type: none"> Applicant's Comments on information received at Deadline 1' [REP2-030] at page 81 Applicant's Comments on Other's Responses to ExQ3 [REP7-046] at page 2 to 27

	Objector	Plots	Work Number	Applicant's case for acquisition	Document references
				need to be promoted through the Local Plan. Given the need for the proposed scheme to secure the plots listed above the Applicant believes there is a compelling need in the public interest for the powers sought and the Applicant has a clear idea the purposes to which the land will be put if the Order is made and the proposed scheme is implemented.	