CAUSE COMMENTS ON ICENI ADDITIONAL DOCUMENTS

21st DECEMBER 2017

CAUSE has reviewed the additional documents submitted by Iceni and provides the following comments. We have been requesting further information from the West Tey Partnership for three years and this has not been forthcoming. It is therefore surprising that the partnership has chosen to release the information so late in the day without releasing the viability model to back up the proposals. Without the viability model we question whether it is possible for anyone to determine whether the proposals are deliverable.

General comments

1.0 The additional documents do not demonstrate the deliverability of these proposals to garden city principles, in the Plan period or beyond.

1.1 We are pleased that the St Modwen Judgement included with the papers reminds us of the importance of viability in the NPPF (our emphasis in bold): “To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.”

1.2 In the absence of access to the viability modelling work, it cannot be assumed that the proposal is viable, whether for 2,500 dwellings in the Plan period or up to 17,000 dwellings beyond.

1.3 If, as it appears, the West Tey Partnership is presenting itself to deliver outside the NEGC delivery bodies, we believe that the Partnership’s viability model will be as unrealistic as the NEGC model, thus making it extremely unlikely that this location could deliver garden city principles. We remind you that in the location is not acceptable to the councils unless garden city principles can be delivered¹.

1.4 The underlying principles are set out in the Design Delivery Plan. However, in the absence of the viability modelling work to give substance to the promises, the principles mean little.

2.0 We are pleased to see that a the Community Infrastructure Audit has “identified the existing open space, education, health care and other community facilities provision within and in the vicinity of the West Tey proposal site.”, but in the absence of a viability appraisal it is impossible to gauge whether the list is realistic or deliverable.

2.1 In the absence of costed and realistic delivery plans for off-site rapid transit, we do not consider this

¹ See CAUSE’s Matter 2 Hearing statement
deliverable given the congested roads of Braintree and Colchester and the congested rail line.

2.2 There is no employment strategy (and no employment land allocated in Phase 1a). We have already stated in our Hearing Statements that allocating employment land is not adequate to generate employment for a settlement of the size proposed.

2.3 The West Tey Partnership scheme locates the new station away from the new town centre, thus reducing the likelihood of achieving a high modal shift from car use.

2.4 Timings are vague, and give no confidence of early delivery (or delivery at all)

2.5 CAUSE has carried out research. We visited Ebbsfleet, and subsequently had a long phone discussion with the Head of Design. Summary of conversation: the challenges of creating a new town, employment and a public transport network cannot be underestimated.

3.0 CAUSE also visited Poundbury, which we consider to be a much more sensible, appropriate and realistic scale of development.

Roads & Traffic

3.1 This scheme appears to ignore the, as yet unknown, route of a dualled A120.

4.0 The scheme is proposed to start before the A120 is dualled. It is a matter of local consensus and reinforced by Lord Kerslake’s peer review, that the A120 must be dualled before significant development begins.

4.1 The proposal is dependent on a new link road from the A120 east of Coggeshall to the A12. There is no indication of how this would tie in with the new A120. The lack of viability appraisal for us to analyse gives us little confidence that the cost of this link road and junctions has been fully taken into account. Phase 1b appears to deliver the link road but we question whether this is a viable proposal in addition to other developer contributions.

5.0 The proposed early phases of development (1a and 1b, below), give rise to numerous challenging questions about how realistic the delivery of A120/A12 link roads and junctions are in practice. For example, its junction will be very close to other junctions on the A12 and we wonder if there will be enough spreading spaces between junctions on A12.

5.1 It appears that traffic on the A120 will be required to continue to use the A120 throughout Phase 1a even as traffic increases as homes are built. The A120 is known to be above capacity.

5.2 Phases 1a and 1b create a stand-alone development unconnected to Marks Tey and in which residents will be dependent on car travel. It will create generate additional traffic onto the already heavily congested A120 at Marks Tey. Phase 1a is an ‘infrastructure last’ development, developed before the Coggeshall-A12 link road.
5.3

Traffic modelling

5.4 This proposed ‘solution’ takes no account of congestion on the rest of the A120, including Braintree roundabout and Coggeshall bypass etc, or the local villages.

6.0 The link road appears to connect East-West traffic from Braintree to Marks Tey through the town centre of the garden community – a very unsatisfactory proposal.

6.1 By the time Phase 3 is complete, the community will be surrounded by noisy and polluting roads: existing A120, new A120 (route not known); Coggeshall-A12 link road and A12.

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<tr>
<th>Scenario</th>
<th>Daily trips</th>
<th>AM peak departures</th>
<th>AM peak arrivals</th>
<th>PM peak departures</th>
<th>PM peak arrivals</th>
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<td>600</td>
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</table>

6.2 We question the traffic modelling figures in the West Tey Partnership Initial Site Delivery Transport note, which appear to be very low in comparison with Ringway Jacob figures and Department for Transport figures (below) and also unrealistic. The different sources are wildly inconsistent and it is impossible to gain confidence:
7.0 We have already noted in our Hearing Statement (Matter 5) that the Ambitious modal shift scenario is extremely unlikely, particularly in a car dependent Phase 1a and 1b as proposed by West Tey Partnership with no employment land in 1a.

7.1 Even if the West Tey Partnership figures are correct, they demonstrate an unacceptable 29% increase in traffic at Marks Tey in addition to the general traffic growth projected. This is already a majorly congested area with a poor safety record and long tail-backs daily.

7.2 In addition West Tey Partnership has only considered one junction (below), not the whole network, and has ignored impacts the impacts elsewhere

![Map of Marks Tey area](image)

**Mass rapid transit**

7.3 We are pleased that a number of Mass Rapid Transit systems have been reviewed and in fact this ‘reference class forecasting’ is the methodology applied by CAUSE in our own infrastructure cost analysis.

7.4 We note that Iceni had a meeting with Patrick Warner of Metrobus, who operate the existing MRT system, Fastway.

7.5 We agree with the note from this meeting that the main problems of mass rapid transit systems come form existing constraints and note that the Fastway system required the critical mass of Gatwick Airport. The difficulties of connecting West Tey to Colchester and Braintree cannot be under-estimated – in particular the final mile or two.

7.6 CAUSE has raised concerns repeatedly about the difficulties, costs and required contingencies of these complex transit systems. Recent experience in Sheffield provides a timely and salutary reminder: [https://www.transport-network.co.uk/75m-tram-train-debacle-provides-only-how-not-to-lessons/14685#.WjfqOpBycDE.twitter](https://www.transport-network.co.uk/75m-tram-train-debacle-provides-only-how-not-to-lessons/14685#.WjfqOpBycDE.twitter)
Local communities

7.7 We seek to understand West Tey Partnership’s statement that the “production of any Neighbourhood Plan will not be able to prejudice the strategic allocation of West Tey.” It is essential that any significant development at Marks Tey reflects the emerging neighbourhood Plan.

7.8 Neither West Tey Partnership nor NEGC acknowledge the scale of change they plan to inflict on the rural nature of the area and the communities within it, although West Tey Partnership does acknowledge that Marks Tey, Great Tey, Little Tey, Broad Green, Skye Green and Langley Green will be amalgamated.

7.9 Our understanding is that the green buffers proposed do not fall onto land in the West Tey Partnership’s control and therefore cannot be guaranteed. It seems that this is a proposal for housing on land from which they have a financial benefit and green buffers on other peoples’ land: