

Infrastructure– hearing statement response

The hearing statements submitted by the NEA’s and NEGC give us no further confidence that infrastructure first promises in the Section 1 Plan can be delivered. Financing & viability dealt with in Matter 7 and we set out brief infrastructure comments here on:

- i. Rail
 - a. Capacity
 - b. Station improvements
- ii. Roads
 - a. Gateway120
 - b. Country lanes
- iii. Water
 - a. Supply
 - b. Sewage & surface water runoff
- iv. Rapid Transit

i.Rail

a.Capacity

We see no further evidence that infrastructure interventions on the Great Eastern Mainline are costed, scheduled or funded. The statement of common ground gives us no further confidence – it is simply a statement of co-operation, admitting that there are capacity issues on the line and that demand for rail travel on the Great Eastern mainline will increase by 40-60% over the next 25 years: *“Working collaboratively the partners will seek to identify and agree the rail interventions necessary in terms of infrastructure investment and timetable modifications necessary to support the sustainable growth aspirations underpinning the North Essex Garden Communities, and to identify potential sources of funding to support their timely delivery.”*

Capacity problems and interventions required were known in the previous Anglia Route Study and we cannot understand why a plan has been submitted without the issues being addressed and without any attempt to capture developer contributions to assist with funding interventions.

b.Station improvements

We see no evidence that the process of discussion about station improvements has moved forward. (Note our reference to table 3.1 in the Investment in Stations guide in our consultation submission).

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ii. Roads

The hearing statements contain no A120 announcement and no A12 HIF bid announcement. CAUSE has received no reply from Highways England to our letter setting out concerns about the consultation this autumn about re-routing the A12 to accommodate a bigger West Tey.

The NEAS's hearing statement does make the startling revelation¹ that the moving of the A12 is not a pre-requisite for CBBGC's deliverability or viability. This is a striking admission which confirms CAUSE's long-standing concern that the HIF bid 'unlocks' nothing and does not offer any value to the tax-payer nor does it bring any benefit of any form. We have already written previously to the Right Honourable Robert Jenrick MP setting out our concerns, and outcome of election dependent, we will write to the incoming Minister raising this latest concern with the HIF bid.

Our contention is that any plan including a completely unnecessary re-route of the A12 through countryside and passing through or close to villages must be found unsound. It would be an unjustified decision, in breach of paragraph 152 of the NPPF, which states that significant adverse impacts should be avoided.

a. Gateway120 proposals

It appears that the Iceni report relies on the dualling of the A120 to mitigate transport problems, and therefore if West Tey goes ahead, no houses should be built until the A120 is complete.

Any 'mitigation' proposed at the Marks Tey roundabout should be taken with a pinch of salt. It is the queues onto and off the single lane A120 which create the problems. The Prince of Wales roundabout is equally affected, with queues regularly stretching down as far as the A12. We do not accept that tweaking these junctions is a solution to the increased traffic generated by Phase 1, let alone future phases.

b. Country lanes

It is well known anecdotally that the country lanes in the vicinity of the A120 near Marks Tey have suffered a huge increase in traffic in recent years, because drivers take any route they can to avoid the daily tail backs.

We have discovered that, during November/December, two residents of Aldham were so concerned that they (separately) carried out traffic counts on Tey Road, a narrow rural lane. The results of one count are shown below². Fig 1 shows normal traffic. Fig 2 shows the spike which occurred on a day

¹"6.4a.3 If the HIF bid is not successful then the route between junctions 23 and 25 will be based on the HE 2017 consultation. **Although this would result in fewer homes being delivered it would not affect the viability of deliverability of the Colchester Braintree Borders GC.**"

² The other is in an excerpt from an email to Aldham Parish Council from a resident: "Coincidentally (just for the last two weeks) I happened to have carried out an informal sample count of the number of vehicles passing my window which faces Tey Road, in **one hour** of rush hour morning **and one hour** of rush hour evening on weekdays, and the same times at weekends. (Between 0730 & 0830, and between 1700 & 1800). These cars will all pass through part of the village at some stage on their journey, so the numbers are probably very relevant if there are going to be several cars parked near the crossroads ... I guess the effects would become a

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when the A12 and A120 were grid-locked due to an accident (a regular occurrence³ and coincidentally, happening today on the country lanes where I live as I type, due to temporary traffic lights on the A120 causing tail-backs from Bradwell beyond Coggeshall). The reason that this is relevant is because we can only imagine how much worse this will become, on all the lanes surrounding West Tey, if it goes ahead:

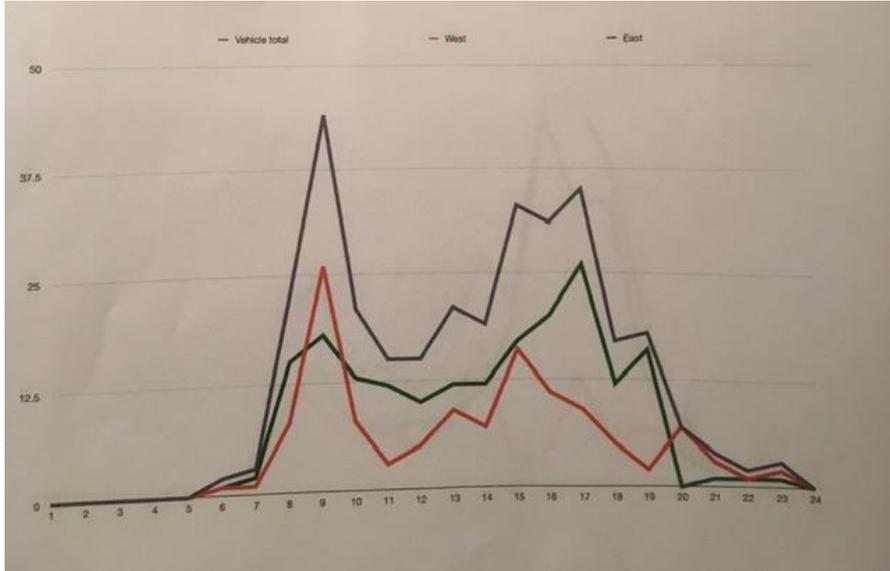


Fig 1

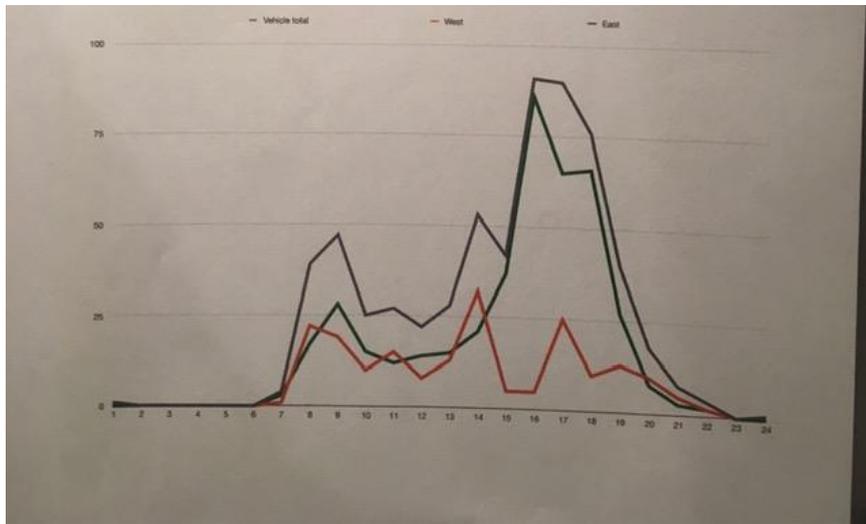


Fig 2

*real nuisance for the village, at some times of the day. With a bit of averaging, during just those 2 rush hours per day, one morning and one evening, there are approx 520 cars per week (of which only 20 at weekends) past my Tey Road window. Total two hours per day. **This alone** [WITHOUT the total number of vehicles for the rest of each day being factored in] equals 2,080+ vehicles per month, and 24,960+ per year. The rush hour average is about 90-100 per hour, or over one a minute."*

³ In fact, over the period of hearing statements and further statements, there have been more traffic incidents and tail-backs on the A12 and A120 than clear days. We have taken lots of photos of traffic jams if the Inspector is interested.



Fig 3. Tey Road – nearly 100 cars per hour on A12/A120 incident days

iii. Water

We have submitted a further hearing statement about water supply and treatment for Matter 1, and the concerns we raise have equal relevance to Matter 6, so we copy the relevant paragraphs below:

a. Supply

It seems that in the current Anglian Water DWRMP⁴⁴, groundwater abstraction and surface water abstraction have been ruled out on environmental grounds, and Anglian Water has confirmed that new reservoirs are no more than concepts. Questions therefore are:

⁴⁴ <https://www.anglianwater.co.uk/siteassets/household/about-us/11b-anglian-water-revised-dwrmp-2019.pdf>

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- What confidence can we have that there will be sufficient water for three new towns (plus Section 2 growth, plus neighbouring garden communities such as Easton Park)?
- Will the water companies have to resort to groundwater pumping if transfers (e.g Severn Trent to Anglian) prove insufficient or impractical?
- What would the impact be, in that situation, on aquifers, river flow and EU habitats, given that it has been ruled out on environmental grounds to date?

b.Sewage & surface runoff

Anglian Water's hearing statement refers to an established mechanism to fund required connections to water supply and public sewerage networks but has not told us how much the 13km pipeline to Rowhedge, nor a 4.8km one to Coggeshall, from CBBGC, would cost. Nor has it confirmed to us whether there is capacity at Coggeshall WRC for any interim solution and at Colchester WRC for Section 1 *plus* Section 2.

Therefore, we still do not know where the sewage from the biggest of the three garden communities, 24,000-home CBBGC, will go and when. We have heard that some developers bridge the gap between start of build and permanent infrastructure but this does not sound like a very sensible solution for the seven years of the plan during which payments for the pipeline are being made, nor do we believe this would represent a 'step change' or 'infrastructure first'.

We also draw the Inspector's attention to a letter a resident received on 12 December from NEGC Ltd (Appendix 1) about surface water run-off. We believe represents a further triumph of hope over evidence. How will the promises be delivered, and can they be financed? The garden city charter is a list of 'nice to haves'. CAUSE has already expressed concerns about assumptions re water use and particularly grey water.

We have tried, over many months and many, many hours, to understand, and gain confidence about, what is proposed for the Section 1 plan, for the supply and treatment of water for three new towns (plus Section 2 growth). Having looked at all the available evidence, including hearing statements, we can only conclude that the Plan is not deliverable, and therefore not sound under NPPF paragraph 182.

iv.Rapid Transit System

We defer to further statement by Walker Engineering/Matt O'Connell and will discuss the RTS proposals at the hearings.

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Appendix 1 – Letter from NEGC Ltd re surface runoff:

You are correct that the issue of rainfall and consequent 'surface runoff' is a serious design question for any development and no less in the question of West Tey.

To answer your question, it is first necessary to consider the development in context.

West Tey is proposed to be a Garden Community, subject to local plan and council approval, with homes and the environment achieving high standards, utilising modern technology.

The design of West Tey will therefore be different to a typical type mass housing development. It will be different because it will be built to Garden City set principles namely;

- Land value capture for the benefit of the community.
- Strong vision, leadership and community engagement.
- Community ownership of land and long-term stewardship of assets.
- Mixed-tenure homes and housing types that are genuinely affordable.
- A wide range of local jobs in the Garden City within easy commuting distance of homes.
- Beautifully and imaginatively designed homes with gardens, combining the best of town and country to create healthy communities, and including opportunities to grow food.
- Development that enhances the natural environment, providing a comprehensive green infrastructure network and net biodiversity gains, and that uses zero-carbon and energy-positive technology to ensure climate resilience.
- Strong cultural, recreational and shopping facilities in walkable, vibrant, sociable neighbourhoods.
- Integrated and accessible transport systems, with walking, cycling and public transport designed to be the most attractive forms of local transport.

Within that Garden Community will be the principle of a circular economy, where as little as possible is wasted and as much as possible is reused for community benefit.

Typically, when ground is covered, water is captured in the local utility drainage and discharged, sometimes miles away. This is not the case in a Garden Community.

In a Garden Community the water will mainly be held and recycled. This is achieved by a number of methods which include;

- Sustainable Underground Drainage Systems(SUDS)
- The creation of Wetlands in the community
- Detention Basins
- The use of permeable pavements
- Green Roofs
- Bioswales
- Recycling water within the home, office and factory
- Using water as a community leisure feature

Having now set the context, I return to your specific question.

When 'substantial' rainfall takes place, producing what could be 'excess' surface runoff, the Garden Community design through green roofs, bioswales and permeable surfaces, will in the first instance mitigate the 'excess' and then secondly the Garden Community SUDS and its Detention Basins, will hold back any other excess 'excess' water, from entering the community drainage system to ensure 'overflow' does not take place. That water is then allowed to permeate back into the land, over a period of time.

Overall the Garden Community drainage systems will be both environmentally friendly and a key component in our sustainable circular economy.

As you may be aware, the design of the proposed Garden Communities has not taken place. However, when/if it proceeds, it will be to these higher standards described and with wider environmental considerations, that we trust will make the Garden Communities such good places to live, work and enjoy.