

Planning Inspectorate
(online submission only)

12th July 2023

Dear Sirs,

**APPLICATION BY NATIONAL HIGHWAYS FOR AN ORDER GRANTING DEVELOPMENT
CONSENT FOR THE A12 CHELMSFORD TO A120 WIDENING
PROCEDURAL DEADLINE 8 SUBMISSION**

Anglian Water makes this final submission in relation to the outstanding matters that are identified in the final Statement of Common Ground at Deadline 7 [REP7-033] between Anglian Water and National Highways, and as referred to in the Statement of Commonality [REP7-032] and Closing Statement [REP-078].

**Final Statement of Common Ground between National Highways and Anglian Water
[REP7-033] and Statement of Commonality [REP7-032]**

**Rivenhall End - removal of access from A12 Service Area (11/11b) – OBJECTION
WITHDRAWN**

As a result of the A12 widening project, Anglian Water's freehold access to the Rivenhall End water recycling centre (WRC) will no longer be available to Anglian Water as an alternative means of access to the WRC. Anglian Water has agreed to the terms set out in a letter of comfort from the Applicant to provide an easement over Plot 11/8a, which includes access to the proposed balancing facility. This will enable a right of access to Rivenhall End WRC if the wayleave for the access currently in use from Braxted Road can no longer be utilised by Anglian Water. Anglian Water can therefore confirm that we withdraw our objection on this matter.

**Draft DCO Protective Provisions: Schedule 11 Pt.3 Clause 27 (Retained Apparatus)
Para. (7) – OBJECTION SUSTAINED**

Anglian Water has qualified our reasoning for requested a revision to the protective provisions in the draft DCO, regarding the stand-off distances, in our Deadline 5 [REP5-023] submission and reiterated these points at our Deadline 7 submission [REP7-057].

Anglian Water continues to assess the measures needed for the protection of our assets based on actual critical events, risks to our assets from other nationally significant infrastructure projects, and recent experience on delivering our own major infrastructure - a 400km strategic pipeline from Lincolnshire to Essex.

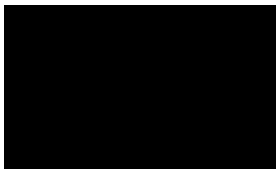
We acknowledge the Applicant's reference in the Statement of Commonality [REP7-032] that our Cross Sector Infrastructure Access Statement (March 2019) is published on our website for the benefit of providing information to infrastructure providers and does not explicitly exclude nationally significant infrastructure projects. However, the scale and range of typologies for nationally significant infrastructure projects suggests that a separate approach is necessary to ensure sufficient measures are in place to safeguard our assets, hence the reason for setting out the protective provisions within the draft DCO, which takes into account the context of the project and relationship with our assets.

Whilst the stand-off distances enable the protection and oversight of works near our assets, it also serves to safeguard the A12-A120 widening project whilst in development. The potential for pressurised pipelines (mains water supply and rising mains for wastewater) to cause damage and delay to schemes from accidental damage/bursts or voids from sewer collapse, can be significant. Factors such as soil type and the material of our piped assets can also have implications. As the largest pipe within the order limits is 1200mm in diameter (surface water sewer) – there is the potential for significant impacts hence the request includes a 12-metre distance each side of the medial line for assets over 400mm in diameter, to ensure we have the appropriate level of oversight to the project detailed design. We therefore have recommended these distances to avoid the risk of such critical failures occurring – for example through vibrations from piling activities.

We would like to take this opportunity to qualify that our revised stand-off distances have been accepted by applicants in the Protective Provisions for Anglian Water for other DCO's currently at examination and with agreed and finalised Statements of Common Ground in place. For the Lower Thames Crossing DCO, we have a separate side agreement with National Highways, which includes our revised stand-off distances, including acceptance of agreeing a distance on a 'case-by-case' basis for our larger assets over 400mm diameter.

Anglian Water is aware that as agreement has not been reached with the Applicant at the end of the examination on this matter, the Secretary of State will need to adjudicate on whether to accept the distances set by the Applicant in the draft DCO or the revised distances proposed by Anglian Water.

Yours sincerely,



Phil Jones
Growth & Strategy Manager – Sustainable Growth

