

Carter Jonas

MATTER 6: TRANSPORT AND INFRASTRUCTURE

**North Essex Authorities Shared Strategic (Section 1) Plan –
Further Hearing Sessions**

**SUBMITTED ON BEHALF OF L&Q, CIRRUS LAND LIMITED, AND
GATEWAY 120**

December 2019

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1 INTRODUCTION

1.1 This statement has been prepared on behalf of L&Q, Cirrus Land Limited, and Gateway 120, who together form the West Tey Partners behind the majority landholdings within the Colchester Braintree Borders Garden Community (CBBGC), with specialist input from Clive Burbridge of Icen Projects Highways (Questions 1b, 6, 7, 18 and 24) and Jonathan Cage of Create Engineering (Questions 10, 11 and 12)¹.

1.2 This Statement covers those questions posed within Matter 6 – Transport and Infrastructure.

¹ Relevant experience of Mr Burbridge and Mr Cage are appended to this Statement.

2 ROAD FUNDING AND PROGRAMMING

Q1(b) Has funding been secured for the A120 improvement scheme between Braintree and the A12 through the Department for Transport's RIS2 programme? If not, what are the consequences for the feasibility of the West of Braintree and Colchester Braintree Borders GCs?

A120

- 2.1 Whilst directed towards the NEAs we feel it important to provide a response to the potential impacts of the confirmation or otherwise of the A120 improvement scheme.
- 2.2 As will be confirmed by the NEAs and/or Highways England (HE), funding for an improved A120 between Braintree and the A12 is yet to be confirmed.
- 2.3 In June 2018, Essex County Council put forward its preferred route option to HE, confirming that Option D was favoured following a cost-benefit analysis. Whilst the Delivery Partners have previously promoted other route options for this upgrade, we do not oppose in principle Option D, and have confirmed in our technical evidence that its delivery, as opposed to one of the other options, would allow for the deliverability of the garden community (GC) in its entirety.
- 2.4 The delivery of the A120 improvement scheme has gained significant local and political support, had verbal support from successive Ministers for Transport, and more recently had a Junior Minister for Transport state that it would be taken forward to the next round of investment in the road network² i.e. Road Investment Strategy 2 (RIS2). However, due to the triggering of an early general election, the publication of RIS2, which was due to be made alongside the Autumn Statement on 5th November 2019, has been delayed. The Conservatives have reemphasised the RIS2 commitment, increasing their proposed investment in strategic and local roads up to £28.6bn from the previous £25.3bn. However, there is clear consensus between the parties towards infrastructure provision and there is no reason to assume that an announcement won't be made following the elections.
- 2.5 Without RIS2 confirmed, the NEAs have rightly attempted to insert contingencies into policy, triggering an early review should the road improvement funding not be secured. However, this fails to appreciate the ability of the site to deliver a GC of up to 9,000 new homes, which with the local community would be approaching 10,000 homes, alongside comprehensive supporting

² <https://www.ipswichstar.co.uk/news/priti-patel-on-new-roads-1-6174385>

infrastructure, an upgrade to the A12, and local road interventions without the A120 improvement scheme³.

- 2.6 Our proposed amendments to policy would cap development at this amount until the funding is approved. Should it transpire that the funding is not forthcoming, a deliverable and sustainable GC can still be delivered. This provides sufficient confidence to ensure the soundness of the Section 1 Plan.
- 2.7 The A12 improvements are expected to be delivered by the time Phase 1 is fully occupied. Highways England have fully committed to the delivery of the A12 with provision for a fourth lane should CBBGC be allocated.

Q6 – What are the consequences of the answers to 2 (a), (b) & (c) for the feasibility of the West of Braintree and Colchester Braintree Borders GCs?

&

Q7 – What are the consequences of the answers to 3 (a) & (b) for the feasibility of the Colchester Braintree Borders GC?

A12

- 2.8 At the Conservative Party Conference on 30th September 2019, the Chancellor of the Exchequer Sajid Javid confirmed the A12 widening would be carried over into RIS2 funding cycle and therefore remain committed.
- 2.9 As will be confirmed by HE, all re-alignment options to accommodate CBBGC that are currently going through the A12 consultation between junctions 23 to 25 would constitute additional scope to the committed RIS funding and therefore require a successful HIF bid outcome, or alternative funding measures to take any of these forward. Should the HIF bid be unsuccessful, HE will revert back to one of the two possible options that are either online or offline, as consulted on in January 2017 and benefiting from secured funding under RIS1, to be carried into RIS2.
- 2.10 The housing figures put forward by the NEAs remain in question, with draft policy still stating 24,000 homes as the upper bracket of the GC size despite the HIF bid submission and the majority of updated evidence referencing an approximately 21,000 home GC⁴.

³ See Highways Assessment submitted with our Technical Consultation representations and Design Brochure for extent of supporting infrastructure (including highways), showing a comprehensive, standalone GC can be delivered.

⁴ https://www.essexhighways.org/uploads/docs/a12-vision_v7.pdf

- 2.11 The route shown in the Infrastructure Planning, Phasing and Delivery [IPPD] document [EB/088] aligns with that of 'Option C' of the October-November 2019 consultation and reflects the HIF bid submission (see footnote 2), not the offline upgrades shown at Option 2 and 4⁵ within the January-March 2017 consultation.
- 2.12 Of the A12 routes considered (including all 2017 and 2019 consultation routes), it would appear that only Options B and D of the October-November 2019 consultation would unlock sufficient land to deliver up to 24,000 homes without "*unacceptable severance*"⁶ as previously displayed in the NEA's Colchester Braintree Borders Concept Framework (EB/026). However, it is unclear whether a successful HIF bid would be able to fund the additional land and road needed to deliver these options through the 'Copford Gap' given its own submission document demonstrates a route shorter than this i.e. Option C of the October-November 2019 consultation.
- 2.13 As has been shown throughout our technical evidence to the Local Plan process, the Delivery Partners have promoted a GC of up to 17,000 homes utilising any of the proposed A12 upgrade options, including an online upgrade of the existing corridor⁷. Accordingly, regardless of the outcome of the A12 consultation or success of the HIF bid, there can be confidence on a GC of up to 17,000 homes, within the current policy bracket of 15,000-24,000.
- 2.14 Furthermore, the proposed amendments to policy put forward within our Technical Consultation representations would cap the GC at a scale that remains sustainable in lieu of the delivery of the A12 improvements.
- 2.15 The matter of the A12 alignment, including the need for additional funding is a matter of 'how' and not 'if' the upgrades will come forward. Accordingly, there is no consequence to the soundness of the Section 1 Plan.

⁵ There appears to be an error in Question 3(c) as options 2 and 4 of the Highways England consultation linked at EXD/066 is the January-March 2017 consultation. The October-November 2019 consultation shows four options A-D.

⁶ IED/011 paragraph 35.

⁷ A 17,000 home garden community would utilise any consulted on A12 upgrade route, dualling of the A120, and local road interventions. Please see submitted Highways Assessment for full details.

3 OTHER INFRASTRUCTURE AND PHASING

Q10 – Do the Integrated Water Management Strategy [EB/015] and the AECOM IPPD document [EB/088] provide sufficient certainty that adequate provision can be made for water supply and waste water treatment for the proposed GCs?

- 3.1 The IWMS provides a number of options for dealing with Wastewater Treatment and Water Supply covering not only technical aspects, but also water quality and environmental issues. The initial results of the first stage show that adequate provision can be made for both supply and treatment of water and that there are no major constraints that would prevent the delivery of the NEGCS.
- 3.2 As with the NEAs, the Delivery Partners have entered into discussions with Anglian Water Services (AWS) throughout the promotion of the GC. Through these talks AWS has confirmed that upgrades to the current network, to include a new main connecting West Tey to the planned upgraded reservoir facility and pumping station at Great Tey, will ensure sufficient water resources are available for the initial phases of the GC.
- 3.3 The supply to the remainder of the development at West Tey and the other GCs is dependent on AWS long term supply strategy which includes bulk water transfers from other catchments, water efficiency measures and the use of grey water recycling. Discussions to date with Anglian Water have not identified any major technical or environmental constraints which would prevent the long term supply needs of the development being met.
- 3.4 Whilst the upgraded reservoir facility at Great Tey will be AWS's option for delivering water to the development, they are also currently in the process of investigating additional options for the long term provision of capacity to this facility. Over the lifetime of the proposed development AWS are planning a major upgrade to water supply resources in the region, including bulk transfers from other catchments, which will be required for any form of development strategy over this period of time.
- 3.5 AWS have confirmed that they have sufficient capacity within their existing waste water infrastructure for an initial phase of development at West Tey, this will require upgrades to the Coggleshall WRC. For additional phases they support the idea of a new Water Recycling Centre (WRC) either onsite within close proximity, discharging to the Blackwater. By providing a new WRC onsite this will provide opportunities for water recycling and the introduction of greywater systems, which will help keep down the quantity of wastewater to be discharged to the nearby watercourses and also reduce potable demand from the development.

- 3.6 AWS are keen to investigate the option to develop a super works in this area with the aim of improving the quality of discharge from a number of existing works, and also allowing for future growth in the region,
- 3.7 A GC designed in line with the aspirations set out in policy provides the opportunity to develop a low water usage scheme, with a community grey water recycling network being provided from the new WRC. This has been factored into our Infrastructure Phasing Plan and reflected in viability testing. Furthermore, the dwellings themselves can be designed to best practice levels of water efficient appliances, significantly reducing the demand on the potable water resources.

Q11 – Is the approach to the phasing of infrastructure provision at the GCs, set out in the AECOM IPPD document, justified and appropriate?

- 3.8 The phasing outlined in the AECOM IPPD is a reasonable approach to be taken and shows how a scheme the scale of the GCs can be brought forward at this stage. All of the main infrastructure items have been identified and appropriate lead in times have been shown in relation to their provision.

Q12 – Would an alternative approach to phasing be preferable, such as that set out in the Infrastructure Delivery Plan by Create, submitted with the response to EB/088 from Carter Jonas on behalf of L&Q, Cirrus Land & G120?

- 3.9 Our Technical Consultation representations raised concern with EB/088 principally on the high phase one infrastructure costs relating to the provision of road infrastructure linked to the A12 improvement, including a wider realignment from that secured by RIS funding, totalling over £124m.
- 3.10 The two principle differences in what is proposed by the NEAs in order to deliver its GC of up to 24,000 homes, and the GC of up to 17,000 homes proposed by the Delivery Partners is the alignment requirements for, and timing for the delivery of the A12 upgrade.
- 3.11 As has been stated, the 17,000 home GC promoted by the Delivery Partners can be delivered utilising any of the proposed A12 improvements. Should this result in being either of the routes consulted on from January-February 2017, costs will be covered within RIS funding. Should one of the four options consulted on from October-November 2019 be delivered, the costs will be covered by both RIS funding and supplemented by a successful HIF bid. In either event, the costs do not need to be intertwined with CBBGC, as they benefit from external funding avenues. Costs for site specific junctions not necessarily covered by RIS funding have been factored into our infrastructure costings, these would be covered in the event of a successful HIF bid.

- 3.12 Our submitted evidence to the Technical Consultation demonstrated the ability to deliver a first phase of development of up to 2,500 dwellings prior to the delivery of the A12 improvements. This would allow for an initial cash flow to be generated from the sale of plots/serviced parcels prior to a significant infrastructure outlay, for the 17,000 Delivery Partner's scheme this being a junction with the A12 and link to the existing A120.
- 3.13 Other differences in the infrastructure phasing between the Create Infrastructure Delivery Plan and that at EB/088 are largely immaterial, with both seeking the early delivery of infrastructure to support a comprehensive community.
- 3.14 The provision of onsite utility infrastructure within both documents has been built in throughout the construction of each of the development phases which is to be expected. There are however significant differences between the two when considering the initial cost of the offsite utility infrastructure. Within Document EB/088 most of the offsite requirements are fully complete within the first phase, whereas within the Create Infrastructure Delivery Plan these offsite costs have been spread out over each phase. This will significantly reduce the initial costs and will enable early capital to be generated before more costly offsite works are required. Document EB/088 assumes that wastewater flows will be pumped to Colchester WRC, however as discussed previously in Question 10, AWS have confirmed their support of a new waste water treatment works for the development. AWS have also confirmed that there will be opportunities to delay investment in a new WRC works for an early phase by upgrading the existing Coggeshall WRC, which will also reduce initial costs.

4 RAPID TRANSIT SYSTEM AND MODAL SHARE

- 4.1 In responding to questions relating to RTS, we would largely defer to the NEAs and will focus on its relationship with the proposed GCs.
- 4.2 We continue to support the aspirations for a RTS across North Essex and will assist the NEAs where possible to see it delivered. At all stages of design, the Delivery Partners have accommodated the potential for this regional system to connect in to the GCs. This includes factoring in the need for designated route corridors and transport nodes at key locations of West Tey.
- 4.3 Whilst supportive, we have maintained that the successful delivery of an RTS is not a requisite of the soundness of West Tey as a sustainable locations for growth. Policies SP7-SP10 secure place making principles to create a *“holistically and comprehensively planned new community... to incorporate a range of homes, employment, education & community facilities green space and other uses to enable residents to meet the majority of their day-to-day needs, reducing the need for outward commuting.”* The site has direct access to a mainline railway station, with the potential to design bespoke sustainable access options⁸ to this.
- 4.4 Analysis has been undertaken without the benefit of the of modal shift the RTS is expected to deliver. This will ensure that the local highway improvements are capable of accommodating the proposed levels of housing⁹ in the absence of expected modal shift or a critical sustainable development size in the early phases. If and when a RTS comes forward the sustainable benefits would show an improvement in network capacity currently being modelled for the site by the Delivery Partners.
- 4.5 Delivered in line with policy, CBBGC can be expected to achieve sustainable levels comparable to key service centres such as Braintree, Clacton-on-Sea and to a slightly lesser extent Colchester. It will benefit from greater connectivity to larger conurbations¹⁰ within the County and wider region than many of these key service centres. Any suggestion that RTS is necessary in justifying CBBGC as a sustainable location would undermine decisions to locate new development at towns such as Braintree, Clacton, or smaller settlements such as Witham or Halstead, all of which are accepted sustainable locations for growth.

⁸ Pedestrian, cycle and internal public transport links as detailed in our Highways Assessment evidence.

⁹ In line with the phases proposed in our Technical Consultation representations.

¹⁰ Norwich, Ipswich, Colchester in the north and Chelmsford, Brentwood, London to the south.

Q18 – How would connecting public transport services within the proposed garden communities be funded?

4.6 The Delivery Partners have factored in the need for public transport services within the GC. Details of early phasing public transport interventions are detailed within our submitted Highways Assessment and financial costs have been factored in to the Infrastructure Delivery Plan and Viability Appraisal for both an internal public transport system and travel planning.

Q24 – Should these (or other) mode share targets be included as requirements of the Section 1 Plan’s policies?

4.7 The Delivery Partners support the aspirations of the modal share targets set out in EB/080. However, these do not represent a necessary for justifying the GCs, nor for them to represent a sustainable form of growth of the NEAs.

4.8 The Section 1 policies already include a number of references to integrating measures that would go towards achieving these modal share aspirations. These include¹¹:

- Numerous references in the Vision, including:
 - Enabling healthy and active lifestyles;
 - Create the right balance of jobs, housing and Infrastructure in the right locations;
 - Reference to the North Essex Garden Communities Charter which itself has principles on integrated and sustainable transport and good design;
- Policy SP2 cross refers to the North Essex Garden Communities Charter;
- Paragraphs 6.13-6.18 setting out support for sustainable transport measures;
- Paragraph 6.22 and the role in creating a healthy community including the role of walking, cycling and public transport;
- Policy SP5 includes at Section A provision of appropriate sustainable travel options, Section B for the NEAs to work with partners to deliver changes in travel behaviour by providing a range of measures, and Section C encouraging healthy, active and inclusive communities;
- Policy SP6 requires the prioritising of pedestrians, cyclists and public transport;
- Policy SP7 seeks to provide one job per household within the new community or short distance by public transport, create vibrant and walkable neighbourhoods, development parking approaches that promote use of sustainable transport, and networks of green spaces;
- Policy SP9 (but applicable to SP8 and SP10 also) also requires a strong green grid, a package of measures will be introduced to encourage smarter transport choices, bus/rapid transit

¹¹ Paragraph references are in line with suggested modifications.

priority measures, foot and cycle ways, making Marks Tey station more accessible, and providing centres that are easily accessible by walking, cycling and public transport.

- 4.9 Accordingly, the actual measures that go to achieving this modal share are already secured in policy.
- 4.10 We have raised concerns in our Technical Consultation representations over the appropriateness of the targets put forward by the NEAs. The inclusion of specific targets is considered unnecessary and unjustified. Furthermore, it is not believed to be something that is enforceable by policy. One measure could be for the NEAs to monitor modal share rates over the lifetime of the project, reviewing sustainable transport measures should such targets not be achieved.

APPENDIX 1: QUALIFICATION AND EXPERIENCE

Clive Burbridge (Highways)

A Member of the Royal Town Planning Institute (MRTPI), a Fellow of the Chartered Institution of Highways and Transportation (FCIHT), Associate Member of the Institute of Highway Engineers (AMIHE) and Chartered Member of the Institute of Logistics and Transportation (CMILT).

Holds a BSc (Hons) in "Planning and the Environment", together with an MSc in "Transportation Planning and Management".

I am an equity Director of Icen Projects Ltd and a Director of Transportation, advising clients in both the public and private sectors on transportation and highway matters relating to proposed and existing developments. In addition to 9 years' experience with Icen Projects Ltd, my past experience covers circa 15 years with Waterman Boreham Ltd (previously Boreham Consulting Engineers Ltd), where I was a Technical Director in charge of the company's largest transport planning team and circa 5 years with Kent County Council dealing with matters of transportation planning, development control, highway improvement schemes and accident remediation works. During this time, I also qualified with the Royal Society for the Prevention of Accidents (RoSPA) as part of their Road Safety Engineering Accident Investigation and Prevention certification (July 1995), which has continued to inform my transport engineering judgements/experience.

Jonathan Cage (Infrastructure)

I am Jonathan Paul Cage, a Chartered Civil Engineer with over 30 years of experience providing expert advice on Water and Infrastructure Design Projects throughout the UK for public and private sector clients. I am a Bachelor of Engineering with Honours, a Master of Science in Geotechnics and a member of the Chartered Institution of Highways and Transportation. I am also a member of the Institution of Civil Engineers.

I am the Managing Director and owner of Create Consulting Engineers Ltd who are an award winning multi-disciplinary civil, structural and environmental engineering consultancy with offices in Norwich, London, Glasgow, Milton Keynes and Chelmsford. I have extensive experience in the design, planning and delivery of infrastructure for large scale commercial and residential developments.