

Technical Note

Project No: ITL13304
Project Title: North Essex Authorities Joint Strategic (Section 1) Plan
Title: Response to NEA Answers to the Inspector's RTS Questions [ISSUE]
Ref: SAW/DF/ITL13304-023A TN
Date: 7 February 2020

SECTION 1 Response to NEA Answers to the Inspector's RTS Questions

- 1.1 This Note has been prepared on behalf of Ptarmigan Land Ltd. (Ptarmigan) to respond to the North Essex Authorities' (NEAs) answers to the Inspector's questions of clarification on the Rapid Transit System (RTS) Vision to Plan (*document reference: EXD/075*). This was published shortly before the Matter 6 Hearing on 16 January 2020 where the Inspector confirmed that he will be inviting written responses to EXD/075, although high-level comments in advance of written responses were welcomed at the Hearing.
- 1.2 Whilst EXD/075 provides further clarification on a number of points of detail regarding the RTS model, there continue to remain substantial uncertainties around the cost, delivery, phasing and funding of the RTS. As previously outlined, these uncertainties seriously undermine the ability of the RTS to deliver the rightly and necessarily ambitious modal split targets of the Garden Communities (GCs).
- 1.3 The clarifications on cost estimates on Page 1 of EXD/075 fail to fully provide sufficient comfort in terms of accuracy. Estimates of both upper and lower bound costs are presented by the NEAs which have been supposedly 'benchmarked' against two RTS schemes in Bristol and Salford. Despite the lack of justification as to why the Bristol and Salford schemes are appropriate benchmarks, EXD/075 states that the **"...benchmarking exercise does suggest that costs are likely to be towards the upper bound"** which brings into question the consistency with the viability report prepared by HYAS as to which is the correct costing bound to apply. Based on this statement by the NEAs, it would therefore seem sensible to apply only the higher bound costs to all costing/viability estimates and it is unclear whether this has been adopted. If this approach has not been adopted, there is a significant probability that the RTS costs will have been underestimated, in turn affecting both scheme viability and deliverability.

- 1.4 Furthermore, it is noted that the tables on Pages 5 and 7 of EXD/075 include a number of trips in the RTS modelling associated with the Easton Park GC which does not itself form part of the NEAs Strategic Plan. Instead it forms part of the neighbouring Uttlesford Local Plan which has recently been found unsound. It is therefore the case that the RTS modelling includes forecast patronage by developments outside of the plan period/area which have no guarantee of coming forward in conjunction with the NEAs GCs within the timescales assumed and that the RTS is reliant on the delivery of a route to the west via Easton Park which is inherently uncertain. Should the Easton Park GC not come forward or not come forward in the timescale assumed, there will be continued uncertainty regarding the delivery of the RTS as there will be clear gaps in RTS funding and patronage, which in turn will affect the viability of the RTS. This is particularly pertinent as the Inspector for the Uttlesford Local Plan has recently recommended withdrawal of the plan, the recent letter from the Planning Inspectorate (dated 10 January 2020), notes at paragraph 58 that ***"Easton Park and West of Braintree are reliant on the RTS to ensure that they are sustainable communities."*** As previously stated on numerous occasions in our representations, any uncertainty in the deliverability of the RTS will not deliver the necessarily ambitious modal shift targets on which the Plan is predicated.
- 1.5 It is the case that, at present, the modelling presented by the NEAs is over reliant on too many variables to provide a complete picture of the deliverability of the RTS (i.e. should one or more of the GCs be delayed, should Easton Park GC not come forward, are the costs/usage estimated correctly etc.). Whilst it is accepted that, at this stage, assessments will need to be somewhat strategic in nature, given the scale of the proposed GCs and the extent of the RTS, the assessments presented do not provide the comprehensive analysis required to give the necessary certainty that the plan is deliverable. The analyses provided fail to present sufficient evidence that the RTS can be provided either ahead of the GCs, in tandem with the GCs or phased alongside the GCs. This was the case two years ago and the inherent weaknesses identified by the Inspector at that time remain.
- 1.6 In conclusion, there remains insufficient evidence that the proposals are justifiable and have a reasonable prospect that they can be delivered. As per the comments from the Planning Inspectorate on the neighbouring Uttlesford Local Plan, the costs, viability and deliverability of the RTS are uncertain and the plan does not sufficiently account for the enormity of delivering three GCs concurrently. Further work is necessary to justify these ambitious allocations.