

North Essex Authorities – Section 1 Plan. Representations on behalf of Parker Strategic Land. Note on matters raised in EXD/075.

06/02/20

Introduction.

This note has been prepared by RPS Transport on behalf of Parker Strategic Land, to provide comments on the matters raised in the document submitted to the North Essex Authorities' Section 1 Local Plan Examination under reference EXD/075.

Document EXD/075 was prepared by NEA's in response to the Inspector's questions on the RTS Vision to Plan document EB/079.

In responding to this document reference is made to the previous comments provided as part of the submissions on Matter 6 by Parker Strategic Land.

In response to Question 23 of Matter 6, Parker Strategic Land identified that there is not an evidence base to justify the mode share targets set out in the Mode Share Strategy document.

Document EXD/075 only reinforces this point. As set out below the document fails to consider :-

- that the full effects of the mode share are only delivered post 2078.
- the lack of evidence on the capacity of the highway network prior to the full effects of the mode shift occurring.
- the lack of any evidence over the triggers required to ensure unacceptable levels of impact do not occur.
- The lack of a fully connected RTS between Colchester and Stansted from the outset of the development.

The Inspectors from the Uttlesford District Council Local Plan Examination recognised the failings of an RTS system that was not complete and not available from the outset of the delivery of the housing. Paragraphs 44 to 46 of the Inspectors report state:-

“44. The Council also advises that it is not necessary to delay the housing delivery to allow for the delivery of the RTS. Whilst appreciating the difficulties in providing a full RTS service from the outset and recognising the role of incremental improvements, in our view, the lack of a RTS until towards the end of the plan period would mean the modal shifts anticipated would not be realised. Moreover, the use of less sustainable modes of travel could have become engrained in the habits of residents living in the homes built within the early phases of the Garden Communities. According to the latest trajectory in ED51 this would be well in excess of 1000 homes.

45. There is valid, widespread concern, shared by us, that the infrastructure serving the Garden Communities would fail to meet the true BRT standards until after 2033. Table 3-2 of ED13, shows that after 2033 it is predicted that there would be a service every 5 minutes, between 6am and 10pm. This would be around 8-10 years after the delivery of the first homes. From 2024 until 2033, services would gradually increase from every 15 minutes to every 10 minutes. But this would depend upon commercial viability.

46. This being so, there is a danger that the Garden Communities would be served by little more than a conventional, regularly running bus service for a good number of years. This would use the existing road network, which is at times congested and there are concerns that such a bus service would be no quicker, and potentially slower, than travelling by car. It is also unclear to what degree the buses would run on existing roads as opposed to segregated bus lanes or busways and how the latter would be phased in.

The Inspectors report then comments at paragraph 54.

54. However, the Council's responses in ED72 confirm that the RTS could be provided in discreet segments and that any links via the RTS to West of Braintree (from Easton Park) would only be provided beyond the plan period. These positions do not seem to be aligned. Whilst appreciating that Easton Park and West of Braintree have different and separate employment destinations, in simple terms the absence of the RTS to West of Braintree and the town of Braintree beyond would mean that for trips eastwards to meet needs other than employment, the future residents of Easton Park would be without the sustainable transport options offered by the RTS.

Accordingly the concluding comments of the Inspectors highlighted that the uncertainty of the costs, viability and delivery of the RTS would mean that any benefits would be realised too late to ensure the Garden Communities would be sustainable places.

As set out below, Document EXD/075 does nothing to address these concerns and only highlights the uncertainty over the delivery of the completed RTS and the desired mode share.

Document EXD/075.

Item 1.

No further comments are provided in relation to this matter.

Item 2.

This matter deals with the end to end journey times assumed in the model. The note includes plots from the model relating to Colchester, Marks Tey and West of Braintree which include assumed journey speeds over sections of the route. It is understood the model is for the AM peak period and reflects the speeds in 2033 and 2051.

A number of issues arise from this as set out below:

- a) There are no details of Route 4 and how the RTS between Marks Tey and the centre of Braintree can be connected.
- b) On the first plan, the speeds of traffic on the A133 to the west, arriving to Colchester and leaving from Colchester are shown as 60kph (37mph). This seems hugely optimistic that such speeds could be achieved in the AM peak in what is a fairly congested area. In the AM peak currently queues regularly extend back toward the Spring Lane Roundabout to the west (A12 Junction 27), together with PM queuing on exit from the junction.

There may be limited opportunity to provide a bus lane in one direction over this section of the A133, but two way bus lanes would have a major impact on the loss of the trees lining this route.

- c) On the Marks Tey Plan (second plan), the speeds of traffic are also shown generally at 60kph (37mph) on the section of the B1408 to the east of the A12, Junction 25, up to the Spring Lane Roundabout referenced above. This is a section of the route of circa 3.0 miles (5km).

However the speed limit of the road over this section of the B1408 is 30mph, (48kph), as shown below, with very little opportunity to provide any priority to the RTS. Hence current peak hour congestion would mean traffic speeds would be far less than suggested with increased congestion to 2033 and 2051 reducing this further.



Photograph showing speed limit on B1408 at Marks Tey.

Accordingly the assessment of these elements of the RTS are not an accurate assessment of the current levels of bus travel along these routes, let alone the conditions likely in 2033 or 2051. **Item 3.**

In the context of Item 3, based on the comments above the revenue forecasts cannot be relied upon as the journey times included in the assessment, over the identified routes, will not be achieved, impacting on the level of mode shift that is likely to occur.

Item 4.

The assessment of the revenue between 2026, 2031 and 2051 must be based on the assumptions of achieving the mode shift over these periods. These assumed mode shifts are shown in EB/080 at Tables 7-2, 7-3 and 7-4, together with Figures 7-1, 7-2, and 7-3.

However, as set out below, the 2051 targets shown in EB/080 have been reduced in the tables included in EDX/075. This is discussed further under the next item.

Item 5.

The response to this question highlights the aspirational mode shift that is fundamental to the delivery of the three GCs. The document states that “...continued investment across a range of measures over many years will be required to meet the mode share targets”. Document EB/080 highlights that the full effects of the mode share shift to 70% active and PT modes doesn’t get delivered until post 2078.

Hence whilst the overall assessment of the impact of the three GCs has been considered, what is lacking from the evidence is the assessment of how this shift in the mode share effects both the highway capacity and RTS revenue over the earlier years and through the phased delivery of infrastructure.

The evidence is also lacking any assessment of the triggers required to ensure unacceptable levels of impact do not occur between the commencement of the developments through to the full delivery of the three GCs.

The tables included under this item only highlight the uncertainty of achieving the mode shift required. The figures included in the tables identify car and PT trips for each of the Garden Communities in 2033 and 2051. The figures for 2033 replicate those as shown in Tables 7-2, 7-3 and 7-4 of EB/080.

However the figures for 2051 have been reduced from those in EB/080 reducing the mode shift to PT and increasing the level of car share at the future assessment year. This is shown in the Table 1, below.

Table 1. Comparison of mode shares shown in EB/080 and EDX/075.

Garden Community	Mode	EB/080 2033		EXD/075 2033		EB/080 2051		EXD/075 2051		2051 Change from EB/080 to EDX/075
		Trips	%	Trips	%	Trips	%	Trips	%	
CTBCG	PT	435	19%	423	19%	1428	30%	1303	23%	-7%
	Car	1820	81%	1834	81%	3401	70%	4171	77%	+7%
CBBGC	PT	434	19%	434	19%	1846	28%	1676	23%	-5%
	Car	1805	81%	1805	81%	4633	72%	5725	77%	+5%
WOBGC	PT	388	25%	393	25%	1251	31%	1123	26%	-5%
	Car	1193	75%	1179	75	2783	69%	3180	74%	+5%

As can be seen in the table the figures for 2033 are consistent between the two documents. However in 2051 the anticipated mode share shift to PT for the three communities have been reduced by between 5% and 7%.

This is around a 9% reduction in the overall number of PT trips previously anticipated in 2051 and must go to reduce the revenue in the overall assessment of the RTS.

The statement is then made that the “model does not seem to over-estimate the amount of trips on PT relative to the background level of PT use”. However this is not RPS’s interpretation of the figures provided.

The data include in the tables shows that for Colchester as a whole, the share of PT trips reflects 16.12% in 2033, and for Colchester Centre the percentage increase to 20.30%. This is as one would expect with the town centre showing higher levels of PT than in Colchester as a whole due to the ease of access to the rail station and bus services for those living within the Town centre.

These figures are broadly seen to increase by 2% between 2033 and 2051.

However, the assessment of the NEGC assumes WOBGC has a PT share of 24.99% in 2033 and 26.1% in 2051. These figures reflect a mode share 8.9% above the mode share for Colchester in 2033 and 7.7% in 2051.

Given the lack of access to a rail stations for WOBGC and the ease of access to the A120 and A131 for car trips, it is difficult to see how the statement made by the NEA's in EDX/075 can be correct and that the PT share is by comparison an over-estimation of the likely PT use especially at WOBGC.

Item 6.

No further comments are provided in relation to this matter.

Item 7.

The baseline data for the mode share is key to understanding the likely changes that will occur to the mode shares over time. The information provided in the table is assumed to be the baseline data in the model which is taken in part from the 2011 Census data.

However what is not clear from this is the split between Buses and Trains within the PT share of the data included.

What is evident is the higher levels of PT provision from locations such as Chelmsford, Witham, Colchester and Kelvedon and Marks Tey, compared to Braintree and Great Dunmow. This no doubt reflects the provision of a rail station at the communities, and a rail station on a main line rather than the lower level of service provided at Braintree.

The figures provided in the table under Item 8 also highlight the base level of split between bus and train. Hence the base levels of PT service within the model are mainly derived from rail patronage rather than bus patronage.

This makes it harder to understand the optimistic mode shares the NEA's have identified specifically for the WOBGC.

Item 8.

Turning to item 8, the figures shown reflect the Census data for each of the overall districts. However when looking at the detail of various communities within Braintree it can be seen that higher non car mode shares can be achieved.

Details are provided by RPS in their submissions dated 26th September 2019 to the Local Plan at Table 1.9 of that document. This includes the existing mode shares for work related trips within Braintree. From this the data below has been extracted reflecting the percentage mode shares between car, bus and train.

Table 2. Comparative Mode Shares Within Braintree District. 2011 Census Data.

Location	Car	Train	Bus
Braintree District	86%	11%	3%
Kelvedon and Coggeshall	72%	26%	2%
Witham	75%	22%	3%
Marks Tey	79%	20%	1%
Braintree Town	85%	11%	4%

Hence within Braintree District, where a mainline station is available the mode share to cars reduces and is replaced by train travel as one would expect. There is no certainty that this mode shift would translate within the NEGC to the RTS.

Item 9.

The only comment to make in relation to this matter is the PT modelling relies on an accurate assessment of the highway model and the levels of congestion within the study area. RPS do not believe detailed modelling of all the GCs has been undertaken and there is no detailed modelling with the evidence base.

A model exists which was used to form part of the assessment of the HIF bid for the A12 widening to assess the impact of the CBBGC. However this modelling is not part of the Local Plan evidence base and does not include detailed assessment of the other Garden Communities.

Hence the PT modelling and predictions over mode shift are flawed by the lack of detailed highway capacity assessments at the critical assessment years, including the impact on the A120 within Uttlesford.

In this regard the route of the RTS within Uttlesford is critical to the delivery of the overall service. Paragraph 58 of the Inspectors report into the Uttlesford Local Plan highlights the uncertainty of the infrastructure to support the RTS. This states:

“58. Easton Park and West of Braintree are reliant on the RTS to ensure they are sustainable communities, and it is critical that the evidence to support it is provided at this stage. It is not sufficient to say that these really important matters would be resolved at a later date. This work would need to be done now so that the development plan provides the necessary certainty of delivery, particularly given the housing trajectory before us and the significant reliance on Easton Park and West of Braintree to deliver homes (in the case of Easton Park within the next 5 years).”

Item 10.

Within Item 10, it is argued by the NEA's that it would be unreasonable to expect an area like North Essex to have a suite of transport models for assessment of the impacts of development. However given the overall scale of development proposed RPS consider this is not unreasonable.

Experience from other Local Authorities suggests that such modelling is used to assess the overall impacts within Districts, Counties and at a pan regional level. The Leicestershire and Leicester Integrated Transport Model (LLITM) has been used by Leicestershire to consider strategic development within all of the Districts within Leicestershire as well as considering the wider Midlands Connect Strategies as part of a pan regional assessment.

Likewise the Wokingham Strategic Transport model includes for Reading, West Berkshire, Bracknell, parts of Oxfordshire and Hampshire, and is used to assess the strategic impacts of major development in that area.

It would seem appropriate and not unreasonable given the significance of the mode share aspirations, the provision of major trunk road infrastructure and the delivery of the RTS that such modelling was undertaken to support the proposed allocations.