

## Submission Relating to EXD/075

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### Summary of Key Points

- Everything points towards capital costs being significantly too low; here this includes the stated comparables once they are corrected for historical inflation as they must be.
- Capital costs used by Hyas are then the low end of the (wide) High investment case range, driving an even greater shortfall in the context of the viability analysis.
- Information provided suggests an (optimistic) over-simplification of journey times which compromises the modelling - 'rubbish in; rubbish out', to use a well-known modelling expression. This is before the widespread uncertainty around routes is even considered.
- The 2033 modelling is simply not fit for purpose as it assumes RTS routes are fully in place and have been for some time whereas it is obvious (from capital cost phasing and elsewhere) that neither of these assumptions are correct. There is therefore no valid viability modelling for the Local Plan period at all and a 25 year gap (to 2051) before there is any supporting modelling.
- This issue is further highlighted by the modal share outputs provided ("Best Possible", an undefined and unexplained term) being very similar for 2033 and 2051, on and off site. Credibility of the modelling is therefore dragged further into the abyss.
- Beyond journey times, other modelling inputs remain of grave concern: the journey data is old and not DfT WebTAG compliant; it certainly is not appropriate for modelling which aims to justify the allocation of such large and transformational settlements.
- Furthermore it has now been revealed that "public transport" combines bus and train into one 'bucket' which is a nonsensical input into the modelling in this context.
- Our key concerns regarding the EMME model not being fully multi-modal appear to have been confirmed: Jacobs' explanation is peculiarly inconsistent with previous explanations in NEA and UDC evidence but still reveals how inadequate the modelling is to produce meaningful outputs for the purpose at hand. We had pushed previously for technical explanation and acknowledgements from Jacobs exactly for this reason.
- We note that the UDC Inspectors' letter effectively confirms most or all of the views and concerns around RTS which we have raised throughout the NEA examination.
- It merits emphasis that even with a successful UDC Local Plan, there was to be no sustainable transport to Stansted in the Plan period; now in all likelihood there is not even a valid route option within the evidence base or in a real world context, a big problem given the significance of Stansted in the WoBGC site justification and the isolated nature of the site.
- **We conclude that the supporting evidence for the RTS is deficient (even more so following some of the clarifications in EXD075 and responses herein) and certainly not appropriate to support legal soundness of a key sustainability pillar of the largest and longest-term housing allocation in the country. This conclusion is entirely in line with that reached around part of the same RTS proposals in the recent UDC examination.**

<sup>1</sup> As noted previously Mr Johnstone was commissioned jointly by CAUSE, Mr O'Connell and Shalford PC. This document was prepared by Mr O'Connell in close consultation with Mr Johnstone, but it is endorsed and effectively shared by the other parties.

### **Important General Note: RTS Route 3**

Before addressing the specific questions in EXD/075, it is important to make some important points around the RTS Route 3 upfront (all directly relevant to journey times, modal share, operational modelling etc, ie the content of EXD/075) such that they can be considered in relation to the specific questions without distracting from the directness and clarity of our answers to those questions.

Despite the fact that the Additional Sustainability Appraisal seems entirely to ignore this point, and indeed that it is covered only briefly in EB/079, **Route 3 relies heavily on the UDC Local Plan.**

Specifically, EB/079 shows in a number of places an arrow towards Stansted, without showing the actual route (Figure 1-1, Figure 3-13, Figure 3-14); only at Figure 1-7 is Route 3 shown diagrammatically albeit at a very high level. Elsewhere we see the route in text form (e.g. Table 3-2: Braintree – WoBGC – Great Dunmow – Easton Park– Stansted).

Indeed this is noted on p42: *“Since the other sections on Route 4 [this is an error and should read “Route 3”] are outside the boundary of NEAs, tables have not been provided describing route sections between WoBGC and Stansted Airport. However, the proposals can be seen in the figures provided, and have been described in detail in a parallel report prepared in coordination with this one for Uttlesford District Council”.*

The relevant UDC examination document is UDC ref. ED13 (submitted 21/06/2019); there is also a UDC-officer-authored document (UDC ED72) which provides initial responses to a targeted consultation on ED13 which followed the EiP sessions.

**Below we highlight four key summary points in relation to Route 3 (all of which have direct relevance to EXD/075). We provide supporting detail for these points in Appendix A.**

*A. The route from WoBGC to Stansted is very much indirect*

*B. Furthermore, it is certain that there will be no link at all from WoBGC to Stansted during the Plan period to 2033*

*C. The operational viability modelling in the UDC and NEA Rapid Transit documents relies on both Easton Park and WoBGC being built out (and in full size)*

*D. Assuming the UDC Plan is withdrawn as recommended, there is no indication of alternative routes, and indeed potential routes would be unsegregated and already have significant congestion issues*

**A-D outline that not only did the plan as submitted have no direct provision for sustainable transport to Stansted during the plan period, indeed it is highly probable as a result of the UDC examination that within the evidence base – and in a real world context more broadly – there will be no practical sustainable transport solution to reach Stansted on a longer term basis.**

## Comments on Specific Questions Within EXD075

### 1. How were the capital cost estimates shown in Table 5-1 calculated?

The response states in particular: “the resulting average costs per kilometre were compared to benchmark average per kilometre costs from BRT schemes in Bristol and Salford. The benchmarking exercise does suggest that costs are likely to be towards the upper bound. Nevertheless, there is confidence that these estimates are sensible.”

We refer to two key points:

i) **The comparable scheme costs were not adjusted for historical inflation.** as shown in the table below, replicated from our Hearing Statement Response. The NEA assessment is justified by clearly incorrectly applied technical data / analysis. **This is simply and objectively a basic error which totally undermines any “confidence that these estimates are sensible”.**

*Figure 1 – Adjusting Comparable Capital Cost Benchmarking for Inflation (also provided in our Hearing Statement Response of 16 December)*

	NEA	Bristol	Salford
<b>Capital Costs in EB/079</b>	£2.8 - 4.1m/km	£4.6m/km	£5.5m/km
<b>Corrected for Inflation</b>	£2.8 – 4.1m/km	£5.3m/km	£6.6m/km
<b>Discount vs. Comparables *</b>	-	23% - 47%	38% – 58%

\* Range is for midpoint of high and low NEA investment cases (EB/079). For inflation corrections we have assumed straight-line distribution of capital costs across project construction period and 3.5% as an assumption for UK civil engineering inflation.

ii) The Hyas viability modelling uses the low end of the High Investment Case from EB/079. **Only the high end of the High Investment Case really comes anywhere near the two stated comparables pre inflation adjustment** (and then once they are inflation-adjusted, also falls outside the lower boundary of the comparables).

We also note for completeness para 49 of the UDC Inspectors’ letter regarding no material certainty around routes and therefore clarity around capital costs: “It is unclear at this stage which routes would be used for the RTS and how much of the routes would be shared with existing road users or on segregated/dedicated bus ways/lanes.”

### 2. How were the end-to-end journey times shown in Table 5-1 calculated?

It appears that despite the lack of meaningful segregation on most parts of the routes, the RTS speeds are pre-set with no consideration of the significant congestion on the route. For example we refer in Appendix A, Section D to the B1256 around Dunmow being extremely congested, but the third blue-coloured map diagram in EXD075 appears to show RTS operating at full speed on this route. Even with some traffic priority measures (if realistically feasible in heavy traffic; again see Appendix A, Section D), the RTS is hardly going to be able to operate at full speed if the road more generally is 140%+ over capacity. We note as a further example a speed error identified by Mrs

Pearson of CAUSE at the EiP and acknowledged by Jacobs in the same session; closer scrutiny would no doubt reveal unrealistic speeds are widespread.

**This is the sort of over-simplification we have referred to repeatedly in the chosen modelling approach as it significantly understates the RTS journey times, which in turn undermines the outputs given journey time is reflected in the “cost” input of a certain mode share.**

3. Do these two statements mean that the revenue forecasts which appear in Table 5-10 for 2026 and 2033 are based on Routes 1, 2 & 3 being complete, as they would be in at the end of the total capital spend programme in 2051? And that the same applies to the operating surplus / deficit forecasts in Table 5-15

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4. Is this sixth bullet point making a different statement from the first bullet point? If so please clarify what it means.

**In relation to 2033, it has become absolutely clear that the numbers provided cannot be relied upon in any way, for the following reasons:**

i) EB/079 clearly states (as the Inspector has quoted in the question preamble) that the revenue estimates are linked to the provision of the entire RTS route, but we know – most simply from the capital phasing but also clear admissions such as that re no route from WoBGC to Stansted (see Appendix A, Section B) – **that the RTS routes are not even nearly fully in place by 2033**. This is simply a case of modelling something which is not supported by the construction phasing under any investment scenario, but certainly – noting for good order – not the one included in any of the Hyas viability modelling.

ii) The modelling not only **assumes that the full routes are in place by 2033 but also that they have been in place for long enough to build strong usage. Yet neither of these underlying assumptions are correct at all:** again the first paragraph quoted by the Inspector in the question preamble reveals this clearly. This has consequences for all aspects of the operational modelling including operating surplus / deficit forecasts.

iii) **It is likely clear that there is consequently no supporting operational viability evidence until 2051**, which itself likely relies on a level of investment not modelled in any viability analysis (note the vague reference to “the high investment scenario in 2051” in NEA response to (4), but that high investment scenario has a large range from the low end modelled by Hyas to the high end). **This is 25 years after the apparent commencement of the first bus services of the eventual RTS system – a long period over which to have no meaningful supporting evidence from an operational modelling perspective; indeed it indisputable that there is no valid supporting evidence for the Local Plan period for this examination of the Local Plan which we see as a problem which directly relates to legal soundness.**

5. Table 5-9 shows total annual demand for the RTS in 2026, 2033 and 2051 (factored up from AM peak hour demand as shown in Table 5-8). From the modelling, is it possible to say what percentage mode share that represents for journeys originating in the proposed garden communities?

The tables shown are – again – problematic to the extent of being rendered meaningless, for the following reasons:

i) They are described as “**Best Possible**” but there is no explanation of what this means or indeed an acknowledgement of this status in the second paragraph of the response. We refer to our later commentary on modelling inputs and adjustments seemingly being able to create whatever result is desired.

ii) In light of what we have emphasised earlier around the full RTS routes clearly not being in place by 2033 (see e.g. (B) re Route 3, and answers to (3) and (4) above), **we would note it is very peculiar that the modal share splits are almost as favourable in 2033 as in 2051** (this applies off-site as much as on-site). **This clearly undermines any credibility which the modal share results of the modelling might have.**

iii) The second paragraph of the response states that “*In developing the model these were used to check that shift to RTS was not unrealistically high, or conversely, unrealistically low.*” But of course these modal shares do appear unrealistically high – both in themselves and also given that EB/080 serves – referencing EiP Matter 6 – little or no purpose in justifying the ability for the RTS system to drive outsized modal share changes in this context. **Again this undermines the credibility of the modelling at a higher level.**

6. Would this annual cost provide a vehicle that meets the description in the first and fourth bullet points of section 2.2.1?

We observe simply that it seems surprising that vehicles can be leased without any upfront payment (ie capital cost) whatsoever. The impact of this observation is likely that this factor is yet another driver of the inadequate capital costs shown for the RTS.

7. What percentage mode share of all trips does the total number of trips in the PT base matrix represent, and how was this mode share derived?

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8. What values were used for PT share and Car share in this formula?

**Firstly we reiterate our concerns that the input data here is hugely problematic such that the results lack meaning.** The 2011 census data is very old, one (but far from the only) key impact of which is that the cost of private transport has lowered significantly (hybrid cars, electric cars) since that time, while the NTEM data is also significantly out of date. **The modelling is not DfT WebTAG compliant.**

**As Mr Johnstone explained at the EiP Matter 6 session, the data should have been updated, supplemented and cross-checked using surveys.** This clearly would have been proportionate in context since a £300m (+++) capital cost RTS scheme justifying an otherwise unsustainable allocation of 43,000 houses across North Essex relies on getting this modelling right, for if this Local Plan is found sound, there will be little real potential to row back from the RTS system.

**Secondly there is a – newly revealed – obvious flaw with the initial Public Transport share inputs going into this model.** The PT share input is a combination of Train (largest part) and Bus (much smaller part), but only Bus is relevant in context here - there will be little or no real-world switching of passengers from Train to Bus/RTS, for the journey alignments are entirely different. **This flawed approach will skew (in favour of the RTS) the modelling from the outset and indeed substantially obscures the output modal share figures such that they lack meaning.**

9. Please give more details of how the incremental mode choice model works. In particular, how are the PT and highway generalised costs calculated, and how do any changes in such costs translate into changes in mode share?

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10. What is the NEAs' response to this specific criticism of the way that the EMME model has been used?

We would make the following observations on these responses:

i) **Jacobs are openly inconsistent on how the modelling works.** Specifically they quote their own explanation of the modelling (bottom of p70 in EB/070):

*“The EMME model has a highway component and a public transport component. It assigns a fixed number of highway trips and a fixed number of PT as calculated in the mode choice model. (It does not assign trips between the highway and PT networks.)”*

They then say in EXD075 that *“As explained in Q9, this [exact quote above from EB/070] is incorrect. We do assign trips between highway and PT networks.”* To ensure this is fully understood: **Jacobs are saying their own explanation of the modelling in EB079 is incorrect.**

Furthermore, their modelling clarifications for Uttlesford (UDC ED36, a memo from Jacobs to clarify RTS operational viability modelling), makes the same statement as in EB/079 quoted above, that trips are not assigned between the highway and PT networks. **We can only conclude that in EXD/075 Jacobs is attempting to overstate the functionality of the modelling given this clear contradiction of previously consistent explanations across the NEA and UDC examinations. This seems hugely problematic when credibility of the modelling is at stake.**

**ii) The manual nature / lack of fully multi-modal functionality in the modelling is – as we have repeatedly emphasised – an insurmountable shortcoming**

The simplest way to explain this is that full multi-modal modelling (e.g. VISUM), which we would absolutely expect at this stage for such a long-term and large-settlement Local Plan, would dynamically transfer journeys (and parts of journeys) from one transport mode to another depending on the key evolving factor in the modelling: this is usually described in headline as Cost, but incorporates financial cost of chosen mode, time of journey (which is dynamically impacted by congestion), etc. **Journeys in VISUM are not transferred manually but rather move back and forward between the modes as the model is run until optimisation is reached;** this means that important factors such as congestion are dynamically taken into account **in the modal choice.**

The core Jacobs explanation in EB/079 and UDC ED36 **makes it clear that the transfers between modes are manual in this short-cut EMME modelling.** As an RTS route is introduced, a large number of journeys are transferred from Private to Public Transport, and the subsequent reassignment referred to by Jacobs then only relates to assignments within the respective mode for far less significant aspects (potentially routes used etc). **The key shortcoming which renders the modelling inadequate is the lack of dynamic movement between Private and Public Transport once the initial manual transfer is made** (i.e. even if a public transport journey is then deficient because of congestion, it cannot change modes again). It will be clear **that the problem with this approach is that it does not reflect reality meaningfully at all and is likely to overstate vastly the share of the mode to which journeys are manually transferred – RTS (or Public Transport) is that mode here.**

**Mr Johnstone has previously correctly referred to the modelling colloquially as a “hand calculation” for exactly this reason.** The modelling carried out by Jacobs – unlike a dynamic VISUM model – could ultimately in fact be replicated from first principles in an Excel spreadsheet; indeed the Jacobs reference to huge numbers of calculations meaning that *“it would be unfeasible to operate a manual spreadsheet because across matrices we have over 1,000,000 calculations per scenario”* is a red herring on this front – Excel spreadsheets can execute millions of calculations in under a second and macros can be set up quickly and easily to automate manual scenarios.

A significant implication of the above is that the input parameter used to determine the initial Private to Public Transport manual transfer in EMME is of critical importance. When Jacobs in EXD075 show the graph / curve for the impact of “lambda” (p10 of PDF, which has no explicit page numbers), this is particularly concerning as it shows that a small change in the lambda value used can have a huge impact on the probability of modal share change occurring (put simply: the graph gradient in the centre of the curve is extremely steep). Jacobs concerningly note (EXD075) *“The key to a good mode choice model is ensuring a sensible parameter lambda is chosen so there is a realistic level of response”*. **We would note that “realistic level” here might more appropriately be replaced with “desired level” – i.e. if the model operator does not like the modal share change the model calculation produces, he can easily tweak the input lambda to drive a (much) higher modal share change.**

We also express significant concern in relation to the “calibration process” which aims to replicate the current reality (PDF page 9). As set out in (7)/(8) above, putting bus and train in the same “bucket” hugely undermines any calibration – **it will likely be obvious that this approach would lead to a large overstating of RTS usage**. Indeed, the Jacobs answer appears nervously to allude to this deficiency when it says (our emphasis) *“So even though we necessarily make simplification and assumptions on of travel behaviour the model predicts the current state well”*

The interpretation of the response to Question 10 set out above appears entirely consistent with the full Jacobs response to the question – and indeed our assertions / concerns on this front throughout the consultation and examination process – such that we will not comment in exhaustive fashion on the remainder of the question response.

### **Concluding Remarks**

We strongly disagree with the final paragraph of EXD075 that *“The current transport modelling has been proportionate and appropriate to the strategic planning stage. As we move into detailed design, transport models are being enhanced to have a more sophisticated approach”*. **It is very clear that the modelling here is deficient – for a wide range of reasons set out (again) herein – and certainly not appropriate to support legal soundness of a key sustainability pillar of the largest and longest-term housing allocation in the country.**

While the Inspector for this examination will form his own view based on the evidence provided, we note that in response to part of the same RTS system (specifically Route 3), with the same detailed information<sup>2</sup> and the same modelling by Jacobs, the Inspectors for the UDC examination note that (paras 57 – 58, our emphasis added):

*“We cannot agree that the evidence before us as set out principally in ED13 Bus Rapid Transport for Uttlesford - Supplementary Technical Study June 2019 and ED36 Further Information on Bus rapid Transport Modelling, provides a level of detail sufficient to show that the proposed RTS is practical in principle... 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”*

Their view on proportionate evidence is also outlined (and linked to the 2012 NPPF, para 177) at para 56 (our emphasis):

*“Paragraph 177 of the Framework indicates that it is ‘important to ensure that there is a reasonable prospect that planning infrastructure is deliverable in a timely fashion. To facilitate this, it is important that local planning authorities understand district wide development costs at the time Local Plans are drawn up’. In this instance, considerable additional information would be required to establish that the RTS is a practical and viable solution and that it would be delivered at the time it is needed”*

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<sup>2</sup> Note that NEA EB/079 was also submitted as evidence to the UDC examination, as well as the comparable document Jacobs prepared for UDC (UDC ED13).



## **Appendix A: Further Detail on Key Relevant Points Relating to Route 3**

Below we set out supporting detail for the four key points set out in our general note relating to Route 3.

### A. The route from WoBGC to Stansted is very much indirect

The NEA Inspector's para 39 of his June 2018 letter states "*It [RTS] must have a directness, journey time and convenience benefit over the private car from the very beginning to realise this potential.*"

However, there appear to be no plans to have a direct link between WoBGC and Stansted, with all journeys having to go via Easton Park and Great Dunmow (neither of which a car would do) and the connection between Great Dunmow and WoBGC seemingly having a lower frequency (and involving a change of vehicle?): "*it is likely that there would be increased frequencies of BRT vehicles between Stansted Airport and Great Dunmow via EPGC and between WoBGC and Braintree, and a lesser frequency between Great Dunmow and WoBGC*" (UDC ED13, p3).

Indeed we see the Route in full across the segments outlined in Figures 2-7 to 2-11 of UDC ED13. **It will be clear from these that there is only a single, indirect route proposed.**

### B. Furthermore, it is certain that there will be no link at all from WoBGC to Stansted during the Plan period to 2033

Firstly there appears to be **confusion around whether the part of Route 3 joining Great Dunmow and WoBGC is included in the capital costs at all:**

*"It is suggested, however, that capital bids are made for longer term links (such as the Great Dunmow to West of Braintree segment) to government"* (UDC ED13, p3).

However, just as importantly, response 15 in UDC ED72 states that the Great Dunmow to WoBGC connection will not be made during the Plan period to 2033:

*"Response 15. ED13 Executive summary notes that the BRT can be delivered in separate segments, including Stansted Airport-Easton Park-Great Dunmow, which would be complete by 2033 to link EPGC to key destinations. The WoB GC link is beyond this plan period and so no inclusion of this site is included in the assumptions"*

It is not surprising to see the UDC Inspectors note (para 54):

*"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."*

In a situation where the UDC Plan does somehow continue as intended, we have a situation where there is no sustainable transport to Stansted from WoBGC during the Plan period (something which is of course also the case if the UDC Plan does not continue, on which see D below).

This is patently problematic from a West of Braintree legal soundness perspective, highlighted by two documents:

i) *Additional Sustainability Appraisal, Main Report, Tables 4.1 and 4.2*: Same scores given in both Tables (plan period and fully built out) to West 3, the selected option, for SA7: Travel. This is indefensible given the lack of sustainable travel to a key destination like Stansted, although in reality as set out in responses to (3) and (4) below, this is actually just one example of a broader problem across the sites where based on capital cost phasing, RTS routes elsewhere simply are not in place by 2033 either.

ii) *Additional Sustainability Appraisal, Appendix 8, West 3 box*: The importance of RTS and Stansted is highlighted in the site selection justification, which of course has to be read based on the presumption that development must be sustainable: *“The proposal [sic] West of Braintree provides a strategic long term opportunity to deliver growth within the current plan period and beyond and to address needs in the western part of North Essex with direct access to the A120 and the proposed RTS. It is well located to Stansted Airport both as a centre of local employment but also providing opportunities for new business growth. It also provides access to the M11 and the London Stansted Cambridge Corridor”*. But during the whole Plan period there is no sustainable travel to Stansted.

C. The operational viability modelling in the UDC and NEA Rapid Transit documents relies on both Easton Park and WoBGC being built out (and in full size)

The near and long term viability relies on Easton Park and WoBGC (NEA and UDC sections) being built out at the expected rate, with each GC on a long-term basis contributing ~50% of journeys (table taken from UDC ED13).

Table 4-7: BRT mode shares and annual journeys at the garden communities

BRT mode shares and annual journeys at the garden communities	Mode share		Annual journeys		
	Easton Park	West of Braintree	Easton Park	West of Braintree	Total
<b>2024-2028</b>	10% - 15%	15% - 20%	0.08 - 0.12 million	0.17 - 0.21 million	0.25 - 0.33 million
<b>2029-2033</b>	10% - 15%	20% - 25%	0.28 - 0.42 million	0.75 - 0.94 million	1.03 - 1.35 million
<b>Beyond 2033</b>	15% - 20%	20% - 25%	1.73 - 2.30 million	2.04 - 2.56 million	3.77 - 4.86 million

However, we now have – at absolute best – a significantly delay (2-3 years minimum) to the UDC GCs and a smaller Easton Park based on the UDC Inspectors’ comments around the heritage issues demonstrated by the HIA document.

**This means that if the UDC Plan is continued rather than withdrawn, the operational viability modelling has a large “hole” in it. More likely is the UDC Plan being withdrawn and the viability modelling for Route 3 having no foundation whatsoever.**

Separately, and noting for good order, the Route 3 operational modelling is already too optimistic due to the housing trajectories used: note UDC Inspectors’ letter para 55 *“We are also conscious that ED13 and ED36 are predicated on what is now an out of date housing trajectory and are concerned that the delivery of fewer homes than previously anticipated in the early years of the plan at Easton Park and West of Braintree has the potential to affect the delivery of the RTS.”*

For completeness, note also our commentary on the entirely unreliable 2033 (and earlier) operational modelling in the answers to (3) and (4) in our main submission document herein.

*D. Assuming the UDC Plan is withdrawn as recommended, there is no indication of alternative routes, and indeed potential routes would be unsegregated and already have significant congestion issues*

As noted above, there is only one route from WoBGC to Stansted outlined in UDC ED13. **Without Easton Park being built (as now seems likely, even more so in the size originally envisaged), there is no clarity whatsoever regarding potential alternative routes within the evidence base.**

Furthermore it is clearly problematic that in the absence of UDC being embedded / involved in the RTS, a lengthy RTS route would be required for the NEAs in another district (ie UDC) which seems impractical, especially assuming segregation is highly desirable for the RTS to have any merit.

Alternative routes would be the A120 Westbound, which has been highlighted in the NEA EiP Matter 6 session (note UDC ED52) as being significantly over capacity (~140%) by the end of the Plan period even before the BDC Section 2 sites are considered; and the “old A120” B1256, which around Great Dunmow could see even greater levels of overcapacity, referencing the same analysis. Given the aforementioned impracticality of applying route segregation if UDC is not itself involved in the RTS, these traffic levels would obviously be insurmountable impediments to any meaningful RTS.

We note again the site selection justification for West 3 in ASA Appendix 8 in this context.

**Across A-D we have outlined that not only did the plan as submitted have no direct provision for sustainable transport to Stansted during the plan period, indeed it is highly probable as a result of the UDC examination that within the evidence base – and in a real world context more broadly – there will be no practical sustainable transport solution to reach Stansted on a longer term basis.**