SELECTION OF SITES FOR GARDEN DEVELOPMENTS

It has of course long been known that the West of Braintree and West Tey sites were not selected by the councils on any basis of rational analysis of appropriate sites, but arose purely because consortia of landowners seeking to enrich themselves had pushed these sites.

Only very recently, though, has it been discovered that the East site has been promoted from the start by the developer Mersea Homes, starting back in 2008. (See their website, the 2014 report in particular. CBC initially opposed the scheme when TDC ‘bought’ it). Furthermore, MH have close connections with the consultants David Lock who the councils are now using to draw up the detailed plans. It is no surprise, then, that the precise development area selected ‘by DL’ in 2017, including the controversial extension south of the A133, should be so close to that shown in the 2014 MH report!

It is also clear from the MH reports that the whole scheme arose on a road-based analysis and that MH never did any study of the practicability of public transport links with Colchester before promoting the scheme.

TRANSPORT ‘DELIVERABILITY’ GENERALLY

The deliverability of transport ‘mitigations’ for the garden communities is especially vague

(a) because all the significant actions would have to be undertaken by bodies other than TDC/CBC/BDC

(b) because, whereas most of the other needs of the residents of the new communities would be fulfilled by ‘on-site’ facilities, planned from a clean sheet, the transport infrastructure required is largely ‘off-site’ and only achievable (if at all) within the massive constraints of the existing Colchester urban fabric.
Also, as the Infrastructure Delivery Plan notes, whereas highways and rail schemes have definite bodies responsible for delivering them *, public transport schemes have 'less well defined finance sources', with major schemes only getting off the ground in practice if substantial central government money is made available, a chicken which can most definitely only be counted after it has emerged. This combination of circumstances is not happy from the viewpoint of wishing to promote unprecedentedly massive housing developments that are by their own admission only acceptable/practicable on the basis of major public transport improvements.

It is stated that ECC will take responsibility for promoting the major public transport schemes. But ECC has no previous experience of such large schemes, and is in any case now so destaffed as to be incapable of managing anything on that front.

The whole situation has been made worse by the way in which the garden developments, the giant untested basket into which most of the new Local Plan’s eggs are to be carried, were adopted at a late stage in the process and in consequence have been pushed into the Plan prior to the completion of studies into the ‘mitigatory’ transport infrastructure (let alone consideration of the question of by who and how schemes might be delivered once properly identified).

As Kerslake (p.8) notes, the councils need to be ‘very clear about who is responsible for funding or delivery of each element, in particular for infrastructure’. **

All the relevant sections in the Plan text need to be rewritten from the current wish-list approach (mere statements of what is ‘desirable’ or ‘necessary’) into a two-part statement of (a) what is necessary (b) how it will be achieved. (Particularly SP5).

(Note that currently 1.61 and 1.78/1.81 claim that rapid transit ‘will’ be provided, despite the absence of any firmed-up / agreed schemes).

* But in these cases too the bodies in question have their own national / whole-county agendas, and pushing North Essex schemes up to the top of their overall priority list is a most difficult task. This particularly applies to Network Rail, which is also in an inflated-costs financial crisis.

** Translated from senior-civil-servant-speak, this can be assumed to mean ‘you are not being at all clear on this point and you will end up in a disastrous mess if you don’t get a grip on it’.
   But CBC at least do not seem to be translating it correctly.
RAPID TRANSIT' FOR THE EAST DEVELOPMENT (TCBGC):
IDENTIFICATION AND DELIVERABILITY

The councils have now provided, in their 27.10.17 response, a definition of ‘rapid transit’ that largely matches the rest of the world’s understanding of that term. Accordingly, it is now necessary to examine each occurrence of the term in the S.1 text to see whether the term is appropriate in each case. The term appears in 1.61, 1.78/1.81, SP5, SP7 vii, SP8 A.1 and D.7, SP9 D.7 and D.9, and SP10 D.7 (and possibly elsewhere).

It must on this front be accepted that a system can, up to a point, be ‘bastard’, e.g. commonly a tram system mostly on reserved track will have on-street running in a city centre. If the non-separated section is arranged so as to enable the system to run without significant delays from other traffic, the ‘rapid transit’ name is claimable; but if the proportion of reserved track is small and/or there are significant delays from other traffic, it cannot.

One scheme which cannot possibly meet the definition is the so-called ‘guided bus rapid transit’ from North Station to the East development (TCBGC) via the town centre and Greenstead Rd *, which the 2016 Jacobs report concludes is the only viable option for this development without having to close the railway line to Colchester Town. This, as pointed out in the August C-BUS submission (re SP5), is in fact only an ordinary bus service on the existing congested roads, save for the possibility of the (uncongested!) section within the development itself being built as a guided busway. Jacobs 2016 Table 3.5 confirms that no additional priority measures are intended on the North Station - town centre section, and SP8 D.7 that priority measures on the town centre - University section are only something for ‘the longer term’ (meaning post-Plan-period?).**

As for the Jacobs 2016 ‘Option 2B’ *** (referred to as ‘Guided Bus via Colchester Town’ at Jacobs May 2017 p.160), the only other option that they

* It might be noted that the 2016 Jacobs report itself does not actually pretend that this is a ‘guided bus system’, although it does mention the possibility of a guided track within the development itself. Only in the May 2017 Jacobs report (p.158 top) does it acquire this devious and distorted nomenclature. (‘Guided Bus Rapid Transit Solution via East Hill’). All but the most alert readers will, it is presumably hoped, fail to notice that the very next sentence’s reference to ‘guided bus technology only where segregated from traffic’ is effectively negating the claim to be ‘rapid transit’ at all!

** And that of course means only if such priority measures could actually be identified, which examination of the streets in question suggests is unlikely. The one scheme that is mentioned in the Plan, the Greenstead roundabout cut-through, appears not to have any approval from ECC Highways and is decidedly off-normal.

*** For those not involved in the previous Plan process in 2007-10, it might be useful background to explain that ‘Option 2B’ originated back then as the ‘East Colchester Rapid Transit Link’, alias ‘East Transit Corridor’, long before the Garden Developments were thought of, as something essential for the east Colchester (Hythe) regeneration developments, and was to have been constructed by 2014. As with most of the promised schemes in the previous Plan, no attempt was made to proceed with it, and the Hythe housing areas have proceeded on a low-grade basis in an unpleasant environment split up by major roads. Only one of the areas has a pleasantly-accessible bus service, and recent attempts by C-BUS to discuss the poor access of the other areas to bus stops were met with an aggressive refusal by the CBC officer responsible to discuss the subject at all.
deemed worthy of further investigation (and that in the long term only), this can hardly be considered a serious contender given its being dependent on closing the railway line. When included in the previous Plan in 2010 it was supposed to run alongside the railway, a version since rejected by Jacobs because of the extra cost. CBC officers themselves in 2010 stated that closing the railway to build the busway on the rail formation (as is now proposed) could not be considered a ‘feasible option’ (Appendix 1). Nobody would argue with this.

It follows then that there is NO ‘rapid transit’ scheme actually being proposed for the East development (only one scheme that is definitely not ‘rapid transit’, and one scheme that is not politically feasible). Therefore the references to ‘rapid transit’ in SP8 A.1 and D.7 must be removed, and, insofar as it is agreed by the councils that rapid transit is one of the ‘infrastructure’ elements that any garden development must be supported by, the East development fails for lack of soundness on the transport front.

[There is of course no proof that ‘rapid transit’ is achievable for the other two garden developments either, but in their case the situation remains ‘up in the air’, whereas in the East case, with ten years of studies already having been carried out to no conclusion, it is already proven that no deliverable solution is available].

Additionally, the text in the other sections referred to above needs amending to note that no ‘rapid transit’ is achievable in the case of East.

++++ It is understood that the councils intend to publish yet another consultant’s report on ‘rapid transit’ between the 4th December deadline and the start of the hearings. We await advice as to how other parties are expected to respond to this in the circumstances.

#### If there were a tram system in the town centre, it would have been blocked for some three months over the last couple of years by prolonged water etc repair works holes!

**PARK & RIDE: POSSIBLY DELIVERABLE BUT DEFINITELY POINTLESS**

Whilst P&R is also a ‘Section Two’ issue, it must be dealt with now in the Section One report

(a) because there is a reference to an East P&R site(s) in SP8 D.7 which, if allowed to remain, could be claimed by the councils as having already ‘secured approval’ for an East site before the Section Two hearings start

(b) because the councils state that the users supposedly to be generated by the East P&R site(s) will be essential in making the (claimed) East rapid transit systems financially viable on the revenue front during the long years in which there will only be a small % of the housing completed in the East development itself. (Jacobs May 2017 – ‘P&R as an anchor of a high frequency rapid transit service from the outset’). This is all the more important
given the general lack of any discussion of how the proposed transit services at large will survive the early years, unless there is to be unprecedentedly long-lasting and high-sum developer support.

(c) because of the implied claim that this P&R service will assist in preventing the intolerable peak period congestion in east Colchester that might otherwise ensue from the extra population.

The fact that P&R in Colchester is, in contrast, in fact now proven to be incapable of attracting peak-period usage, and is principally succeeding only in gaining non-paying off-peak usage (as already set out in our August submissions), therefore undermines the council’s case on both (b) and (c).

The fact that CBC’s and ECC’s current consultants have, like CBC councillors and officers, chosen to wholly ignore both the long-understood reasons why P&R cannot achieve peak period traffic benefits in Colchester, and the readily-observable actual failure of the Cuckoo Farm P&R service on this front over more than two years, also demonstrates the very irresponsible and reality-phobic way in which the Local Plan ‘evidence’ has been prepared on the transport front. (It is not for us to guess whether the consultants are merely uninterested in discovering the facts, or have been actively instructed by the councils to ignore reality because it is so detrimental to their case for further massive developments). Even in a ‘normal’ town when existing P&R services were apparently ‘working’, any responsible authority would obviously carry out full studies of the results of an initial service before advocating further £5m-each expenditure on more P&R sites. (The number of passengers on every bus is now readily available from ticket machine data). But to deliberately refuse to do any study in a town where anyone can see near-empty peak hour P&R buses on a daily basis almost beggars belief.

ECC, who (unlike CBC) would be expected to pay for the capital and revenue deficit costs of any further P&R scheme, are not so audibly enthusing; but that is significant in itself, as without an undertaking from ECC that it is willing to proceed with such schemes, the talk about them in the CBC Plan is worthless anyway (and would be even if there was actually some possibility of P&R achieving something).

This irresponsibility, however, was not always the case. In the late 1990s CBC, at great labour and cost, carried out a major review of transport policy, as part of which JMP Consultants carried out in 1996 a detailed study of car parking in Colchester, with particular reference to the central area. The results were included in the new policy document Colchester’s New Transport Strategy in 2001. I have abstracted the relevant sections (Appendix 2). JMP made a full count of the number of free employer parking spaces, because it was realised how significant this problem was. And both the JMP report and the 2001 policy document itself warned very realistically of the great difficulties there would be in achieving anything in the peak period by P&R in a town with so much free longstay parking.

Alas, like most local authority policy initiatives, the ‘new transport strategy’ was never heard of again from the day it was published! Nevertheless the
2007 Mouchel report for ECC on the Cuckoo Farm P&R scheme again warned of the 4000 free parking spaces and the consequent unlikeliness of securing peak period transfer from car to P&R. But all these warnings were duly ignored by CBC and ECC officers and councillors, because P&R was something they could be seen to be 'achieving' and was seen as popular.

The predictable outcome has already been set out in our August submission. As a final check on the peak period failure, further surveys have been done this autumn of P&R buses leaving town in the evening peak, the results being:

- Tuesday 26.9.17 – 42 passengers on the ten buses 1630-1830 (average 4 per bus).
- Wednesday 8.11.17 – service disrupted by traffic congestion, only three buses appeared 1655-1755 instead of five, 42 passengers in total (average 8 per bus if the five buses had actually run).
- Thursday 23.11.17 – 32 passengers on the five buses 1715-1815 (average 6 per bus).

Again confirming NO increase in peak usage since the first months in 2015. (One would normally avoid doing P&R surveys in Nov-Dec because of the aberrantly-high usage normally found in the pre-Christmas weeks!). With usage of less than 7 per bus, the service actually results in a (tiny) increase in peak traffic levels compared to people using their cars.

Over 30 months now ECC have chosen to preserve silence on the 'achievements' of Colchester P&R except when forced to give figures by FoI requests. Should they now choose to respond, any figures they give must be treated with great caution. Overall usage figures are meaningless as they merely reflect the relatively-high usage at uncongested times by non-paying senior citizens.

The councils and consultants also continue to ignore the fact that most of the population of Tendring already has quick access to the existing P&R site at Cuckoo Farm only 4 mins further up the A120/A12, as TCBGC residents would also, so no intelligent person would consider building further sites to the east until such (now unlikely!) time when usage at Cuckoo Farm began to fill the maximum number of parking spaces creatable there.

But nobody familiar with local authority behaviour will have been surprised to see the East P&R scheme, already soundly rejected by the last Local Plan inspector, being wheeled out all over again, even though there is now positive evidence that it cannot work!

The council’s irresponsible refusal to mention the ‘4,000 free parking spaces’ elephant-in-the-room also extends to their parking etc policies, which are in consequence as unreality-based as the P&R policy. Many garden development residents with jobs in central Colchester would of course share in the free parking, ensuring their inconvertibility from car to public transport.
OTHER MATTERS

1.73 The councils have not replied to our previous questions as to what might be meant by ‘ECC creating viable public transport routes’.

1.75 There has been no response on the meaning of this ‘never mentioned before’ policy either. In fact 1.75 might be interpreted as meaning that it is a policy to be applied only in new developments. But SP5 refers to ‘the modal hierarchy’ (assumed to be the same thing) as if it were a general policy.

SP5 The terms ‘the strategic area’ and ‘urban transport packages’ (not in the glossary) have no obvious specific meaning. [This also shows that the text has not been properly checked generally against the glossary]. An ‘Integrated Transport Package’ currently exists for Colchester, if that = the same thing: it is restricted to schemes increasing the capacity of the road system for more car traffic.

PUBLIC SUPPORT

It is supposedly a requirement of proceeding with garden developments that there is local public support. However in this case there appears to be almost no ‘support’ except from those with financial vested interests, and the CBC Lib Dem and Labour councillors who were whipped into voting for the garden communities, and are also being prohibited from speaking up for their constituents’ concerns.

Cabinet members now attack critics publicly.
Replacement of the rail line

A bus rapid transit system using the rail line appears to be an attractive option as it could provide better connectivity and flexibility than the rail service. The benefits would however be offset by the limited length of the spur (approx. ¾ mile). Removing the rail operation would impact upon those currently using the branch line to and from the Town station. It is recognised that this currently provides an important direct service for a small proportion of people living along the line. The process of closing a rail line is highly structured. An application to close the rail line is likely to be met with community objection, be very expensive and require an extensive and long approval period. Due to these difficulties it is considered unlikely that replacing the rail line would ever be a feasible option.

Placing a bus way adjacent to the existing rail line

Having reviewed systems used elsewhere, locating a bus way alongside the existing rail line from Hythe Station Road to St Botolphs Roundabout is possible. It would
8. Car Parking

The level of parking provision in the town centre will need to reflect both the need to protect and enhance the economic viability of the town centre, and the environmental and pollution considerations associated with traffic.

Park & Ride is considered likely to contribute to our objectives for the town centre, this issue being covered in more detail under the earlier Topic heading. We need to recognise that custom on the Park & Ride is likely to be limited, unless some steps are taken to reduce the total number of public and private car park spaces in Colchester town centre. Towns where Park & Ride is successful tend to be attractive towns with a limited range of town centre car parking.

Current Parking Usage

The town centre of Colchester (incorporating the on-street areas adjacent to the centre that can be used by commuter parkers) encompasses some 11,000 car parking spaces. Of these, 4,300 are in public off-street car parks, 2,800 are on-street (of which 1,200 are designated as resident only spaces) and 4,000 are private non-residential (PNR) spaces (of which most are used by commuters).

The level of PNR spaces, at 36 percent of the total stock of the town centre, whilst being large, is not as large as many other similar centres. However PNR does account for 70 percent of all long stay parking spaces within the centre and this high value provides a substantial constraint to what can be achieved by the Council in trying to influence travel patterns within the town.

Park & Ride

The Council has, over the last year, operated two forms of Park & Ride. The first is a Saturday only service operating from North Station. This relies on the free use of spaces at the railway station with two buses operating a 15 minute service frequency into the town centre. Payment is made on the bus. Patronage has been low except in the pre-Christmas period. The Council has also operated a shuttle bus service connecting the three most remote car parks to the town centre. Usage of the service was so low that the weekday service has been withdrawn and only a Saturday service remains; however, this is also only very lightly used.

The concept of promoting Park & Ride has been high on the agenda of the Council and is currently being reviewed by the County Council. There are many reasons why the implementation of a viable scheme is likely to be difficult. These include:

- The town is not large enough to generate sufficient demand in any particular corridor.
- There is still un-used parking space in most of the car parks.
- 70 percent of long stay parkers are accommodated in PNR spaces and are unlikely to use other modes.
- Travel along the corridors towards the centre is generally uncongested until the final approaches to the town centre.

Before embarking on new Park & Ride concepts every effort should be made to promote Park & Ride through the railway stations serving the eastern catchment area of the town.

Conclusion

Parking in central Colchester has a key role to play in the delivery of the transportation strategy for the area. The capacity of the existing parking stock is sufficient for current needs but some additional short stay spaces will be required once more retail space is developed within the town. The constraint on commuter parking space should be retained as a means of reducing peak hour travel demand. In the short term it is unlikely that Park & Ride could influence travel behaviour to a significant extent.