



Our ref: Tendering Colchester BGC Reg 18
Your ref: NH/2301031

Tendring Borough Council
Town Hall
Station Road
Clacton-on-Sea
Essex, CO15 1SE

Mark Norman
Operations - East
Woodlands
Manton Lane
Bedford MK41 7LW

Direct Line: [REDACTED]

23 June 2023

Dear Sir,

Reg 19 Consultation Tendering Colchester Borders Community Consultation (May – June 2023)

National Highways (NH) welcomes the opportunity to provide comments on the Submission Version Plan Tendering Colchester Garden Community Development Plan Document (DPD) which covers the next 30 to 40 years (an end period for the plan has not been defined).

NH has been appointed by the Secretary of State for Transport as a Strategic Highway Company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery part to national economic growth. Within this area the SRN comprises of the A12 and A120 between the A12 and the port of Harwich.

NH has previously provided a response in April 2022 related to the draft Submission “Draft Plan Tendering Colchester Garden Community Spring 2022” (Reg 18), as part of this response we look to review how our previous comments have been addressed and raise any new queries and concerns we may have related to the Submission Version of the DPD.

As part of our previous response (April 2022), we made reference to the DfT Circular 02/2014, the SRN and the delivery of sustainable development (the Circular) which sets out how interactions with the SRN should be considered in the making of local plans, we note the DPD aligns well with the guidelines set out in DfT Circular 01/22.

It is accepted that a new garden type community has the best potential to achieve sustainable growth, as sustainability can be designed in from the outset. A large development has more opportunities to realise internalisation of trips provided that facilities and infrastructure are provided at the time they are needed. We welcome and fully support the plans statements on the need for integrated and sustainable transport network that seeks to modal shift to public transport and active travel. We recognise that in a semi-rural area such as this a reduction in car dependence will not be without its challenges. We welcome the commitment to bus rapid transit. If the Tendering Colchester Garden community is to come forward in a sustainable time and delivery of all parts of the development and the supporting infrastructure will be critical and this is always a challenge.

NH has been involved in ongoing discussions with the local authorities in progressing the development of the Statement of Common Grounds (SoCG) related to the Garden Community.

The key concerns NH has raised within the SoCG have included;

- **Traffic Forecasting – Strategic Models** – NH has queried the traffic forecasts adopted by the design and assessment of the scheme, similarly we have questioned the modelling and the scheme being built out in two phases (a change to the scheme which has only been made apparent in recent months).
- **Traffic Forecasting – trips rates & mode shares** – Further review of the reports to be undertaken related to the Transport Evidence Base
- **Design and capacity of the new A120 junction** – Based on the more recent discussions with the developer the proposed link road is expected to be delayed, If the link road is to be provided in two stages, with the delivery of the new A120 junction later on in the process, the impact of the proposed development up to the point at which the new A120 junction is opened to traffic needs to be assessed, we have also previously queried the concerns that by 2041 there could be queues stretching back to the mainline A120 and capacity issues at the junction.

As raised previously, NH has raised the concerns of the potential impact in building a large number of dwellings in such close proximity of the SRN. It is likely that these locations will be impacted by noise pollution from the SRN and would point out that policy is that noise barriers will not be allowed on NH land and we will work with the council to minimise the impacts of noise on residents.

Several policies, and the local plan set out requirements for developments to reduce the impact on or improve local air quality this does not directly relate to the SRN and what mitigation may be required. We will continue to work proactively with yourselves on these matters but would recommend a specific policy which identifies how air quality and noise impacts would be monitored and managed and what interventions may be required (GC Policy 7). We support the Policy 7 parts A & B which outline the requirements of new developments to ensure inclusive active and environmentally sustainable form of travel and through promoting road safety and managing the negative effects of road traffic on sustainable modes and look forward to working with you to facilitate such travel where an interface with SRN occurs and ensure the appropriate measure and mitigations are established to limit any negative impact along the SRN network.

As stated in our previous response, NH will not accept third party connections to its drainage systems, developments must not add extra run off to existing systems, and capacity will need to be checked and upgraded if necessary.

Based on ongoing collaboration and involvement with the progression of the Garden Community we have identified the items below, where we require further information and or clarification to help in further understanding the impact of the scheme on the SRN network.

The plan commits to the delivery of circa 7,500 new homes over the course of the plan period. We require further understanding on the build-out progressions proposed and the phasing to be able to understand the wider impact on the SRN. We have previously raised our concerns related to the transport evidence based and the strategic transport assessment. We have also been involved with planning for the proposed new junction on to the A120 linking the A133,

the modelling work for that has been seen and agreed, that did make allowance for the Garden Community. Our queries related to these issues have been raised as part of the development of the SoCG and we have undertaken further work in reviewing the Garden Community Mode Share Targets Report which forms part of a larger evidence base that has been prepared to identify the proposals in the local plan. AECOM (on behalf of NH) identified six recommendations whilst reviewing the document, four of which are critical to the acceptability of the development (See **Appendix A**, June 2023). Furthermore, we have undertaken a review of the suitability of the Colchester model for forecasting, where AECOM (on behalf of NH) has provided the following recommendations/ findings (See **Appendix B**, June 2023);

- Based upon the review of the Data Collection Report, Model Development and Validation Report Reference Case Forecast Technical Note, AECOM considers that the Colchester Transport Model is informed by reliable data sources and has been developed in line with current best practice and in line with the principles set out in TAG.
- The results of the highways model validation demonstrated that the model generally performs well against the observed data in terms of meeting TAG criteria for the screen lines and journey time comparisons. Furthermore, a more detailed examination of the validation of links within the vicinity of TCBGC demonstrates a close match between modelled and observed link flows.

While AECOM considers that in general, the base year CTM presents a reliable base for the development of forecasts to assess the TCBGC proposals, it notes that CTM represents a 2019 Base Year and will reflect the pattern of trip making and travel behaviour that existed prior to the Covid-19 pandemic.

- AECOM recommends that the advice on proportionate accounting for Covid 19 in prior calibrated models as set out in Appendix B of TAG M4 (Forecasting and uncertainty) issued in May 2023, should be taken into account to adjust the 2019 CTM matrices.
- Of the information contained within the Reference Case Forecasts Technical Note, AECOM is satisfied that the variable demand modelling was carried out in accordance with the guidance set out in TAG Unit M2.1 (Variable Demand Modelling). It is also satisfied that that the forecasting of trips ends, a combination of local plan assumptions and data and NTEM growth projections, was carried out in accordance with TAG Unit M4.
- AECOM notes there are no detailed forecasts available to review and there has been no separate assessment of the traffic generated by the TCBGC proposals. Therefore, there is no information available in order to assess the impact of TCBGC on the highways network.
- AECOM considers that the CTM future model would provide a sound basis for the development of forecasts to assess the impact of the TCBGC on the SRN. This would be either through the direct application of CTM model to test the proposals, or to

provide outputs to support the development of detailed modelling involving microsimulation or local junction models.

- However, forecasts prepared using CTM would require sensitivity testing to take account of the greater uncertainty arising from Covid-19.
- AECOM recommends that when preparing forecasts from assessing TCBGC, to comply with advice set out in paragraph B2.3 of TAG M4 issued May 20223 sensitivity testing should be carried out to assess the further potential for change with respect to the long-term impact of Covid 19. This sensitivity testing should be carried out in line with best practice set out within DfT's Uncertainty Toolkit.

We are working collaboratively with Essex County Council to deliver a junction improvement scheme on to the A120. The exact timescales the scheme is expected to be completed are currently unknown (previously assumed as 2024). The modelling work for the new A120 junction did previously highlight the WB off slip from the A120 would be operating significantly over capacity with the Garden Community and would tail back on to the main line of the A120, this would be unacceptable in road safety terms, this is being further reviewed as part of the SoCG.


We agree in principle with the general proposals for the Garden Community and what is their need/ aim to achieve, i.e., through the promotion of sustainable modes of travel. We have previously raised our concerns related to the modal share targets, set out within the "Tendring Colchester Borders Garden Community Transport Evidence Base Report 2023", upon further review of this document we consider the following findings (based on the technical review undertaken by AECOM, June 2023, see **Appendix A**). Our agreement in principle is based on the assumptions of the recommendations regarded as critical to the acceptability of this development be adopted as part of the scheme and continued collaboration with NH is upheld as the scheme further develops.

NH is committed to continue to work with your authority in a collaborative and constructive manner to support the progression of the plan. As part of this work we will continue to work with you to develop a greater understanding of the impact of the development upon the SRN

We trust the plan above is useful in the progression of your proposals and welcome continued discussions with the council to this end.

Yours faithfully



Mark Norman
Spatial Planning Manager
Operations (East)
Email: 

Appendix A - Tendring Colchester Borders Garden Community Mode Share Targets
Report Review (TN07)

