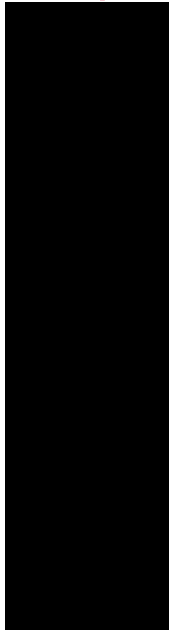


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DPD CONSULTATION RESPONSE JUNE 2023

Peter Kay (Wivenhoe Public Transport Rep since 2007)

Note: 'CBC' is used throughout, the majority of what is discussed here being prior to the conversion to 'CCC'. 'TDC' is not discussed separately as the problems all relate to places to the west of the TCBGC.

1. MODAL SHIFT: A DESPERATE TACK AGAINST REALITY

THE BAD OVERALL BACKGROUND (1): The 'don't live here without a car' future is already with us in Colchester, irreversibly.

CBC is not a transport authority (except on parking – see later) and its main interest in 'sustainable transport' is in producing 'policy' papers and wheeling out the 'visions' contained in them to justify big housing developments as part of its urge to be Essex's fastest-growing town. On these occasions CBC / ECC go into their a parallel universe where everyone will be converted from their usual North Essex car-based attitudes into cycling and walking puritans, and the weather will always be summery just like it always is in the cgie.

As far as *intra*-TCBGC journeys are concerned, the arrangements within the GC may well encourage some success on this front, however the GC itself would never be a place of traffic jams anyway. But what is of interest to everyone locally is, rather, what the GC residents will do in travelling to places *outside* the GC, given the already overloaded road system in east Colchester. And here there is a fundamental problem, totally unmentioned, of course, in the current DPD documents. Over the last few years Colchester has 'flipped over' to a place where so many *destinations* (work, retail and leisure) have been relocated to be more accessible by car and less accessible by other means, that the situation is no longer salvageable.

Just in the last year this has become a big public issue in Colchester, sparked in particular by the move of Marks & Spencer from the High St to the new Stane Park retail development at Tollgate. The large % ** of non-car customers in the High St have been ditched, replaced at Stane Park by people coming in cars from a wider area, generating more traffic, and bringing local traffic standstills on busier days as cars sit in queues, blocking the main roads, awaiting a parking space. (GC residents will of course go there by car on the A12).

** A guesstimate, as M&S would not do any survey of what % of their High St customers and staff arrived by different modes, because the company is fundamentally committed to a car-based future.

People without cars *can* still get there but it takes twice as long on average compared to getting to the town centre, and when one gets there the whole atmosphere is so anti-pedestrian that one does not feel like ever going back.

A further large Tollgate retail development already has planning permission.

This question of 'destination dispersal' is equally ignored in the latest ECC Colchester Transport Policy.

Whilst opposing Tollgate developments, CBC has been actively pushing fringe developments itself on its own land in the 'Northern Gateway', particularly a leisure area incorporating a massive cinema that will undermine the town centre facilities. When this was first promoted the developers *openly boasted* how it would generate car trips from over a large area, and assumed that nobody would get there by public transport. Only when I objected did CBC agree to require a bus service (which might or might not now be provided by the RTS). But the place will always be fundamentally car-based.

In the week of the Glasgow conference CBC happily issued a press release bragging of how many more 'drive through eateries' there would soon be in Colchester.....

Chelmsford in contrast still has a flourishing central shopping area and, whilst the point has not really clicked yet, anyone living near any of the Colchester stations will now find it more convenient to do pleasure shopping in Chelmsford!

So far as travel to work goes, one is reminded of the document produced at the Section One hearing showing how 'well sited' the TCBGC was to main local employment locations. The majority of them were only accessible in a reasonable time by car!

THE BAD OVERALL BACKGROUND (2): The free employer parking problem.

Work by CBC consultants in 1996, as part of the research on the then 'new transport policy' (which, following six years work, was abandoned a few months after being approved!), demonstrated the huge problem that existed in Colchester from the abnormally large amounts of free / cheap employer parking. This problem is virtually insoluble, and the only sensible thing that CBC could have done when it was revealed would have been to keep further population increases to the lowest number they could get away with.** Instead they decided on a policy of mega development, pushing the problems under the carpet.

** Note: It appears (?) that the government in setting housing number requirements does not consider the very varying un/suitability of different places to absorb extra traffic.

The only power available to Councils to control private parking is a Workplace Parking Levy, but in the many years since that became possible only one LA (Nottingham) has dared use the power, and that was with the bribe of a new tram system. No such bribe could be offered in Colchester, which does not have the required population density. ECC has latterly been reminding CBC of the existence of WPL powers, but even in the unlikely event of our motorist councillors approving such action, a WPL has to be approved by a public vote, which is never going to happen here.

THE BAD OVERALL BACKGROUND (3): Public transport problems.

The torrent of cars that come into Colchester from Tendring every morning is one of our biggest transport problems. In the majority of bigger places in the UK there were

large transfers from car to rail commuting in the 1980s-2010s period, because of increasing road congestion and positive attitudes by the LAs. Although this was most notable in the larger cities, it has also happened in places in East Anglia. In contrast Colchester, which never *lost* its local rail services in the 1980s like many places did, has seen a *reduction* in local adult rail commuting from Tendring since c.1990, thanks to persistent negativity by successive train companies; the remaining peak trains are now largely used by schoolchildren and college students. Rail managers have never been interested in increasing usage / revenue here, ignoring the line because it is seen as neither a proper main line, nor a proper rural branch to be politically cultivated. On top of the never-more-than-hourly local service, it has abnormally high fares, especially pre-0900 M-F. Why the highest fares should be imposed in an economically depressed area like east Tendring is never explained. In the whole region of East Anglia no other rail line has been treated in such a negative manner. This has handicapped the ability of anyone to reduce Colchester's transport problems.

London work journeys (by train) have also fallen off dramatically since covid, whereas Colchester car traffic quickly returned to previous levels.

The local bus services held up well up to covid, with increases in frequency in many cases post-2000, but are now pushed into crisis. Usage (per First) is now down to about 80% of pre-covid, the principal loss being of senior citizen passholders in the middle part of the day. Rural routes have seen bigger losses than town routes, and many are now down to about half the pre-covid frequency. Even the present services are reliant on the special government grants, and a spiral of decline may begin when those are ended.

The LAs have now moved into a parallel universe on the bus front too, as can be seen at p.14 of the Infrastructure report where the various new 'policy' reports are listed – Bus Improvement Plan, Colchester Bus Network Review, ECC / Operator Enhanced Bus Partnerships 'to provide a new high quality reliable network', etc. But out in the real world Colchester suffered its worse ever bus cuts in 2022, well beyond what reduced usage would justify. First signed up to the new 'Partnership' in spring 2022 at the very same time that they were registering their major cuts!

It should be noted that, in major London commuter areas like NE Essex, the current modal share figures always quoted – which are in fact purely *journey to work* figures from national censuses, proving nothing about other journeys – have always given an over-rosy picture of the situation.

London commuters are included (as train users) under 'public transport', but many hundreds of them drive daily to North Station at peak / edge-of-peak times, so as far as their impact on Colchester is concerned they are actually car users.

Separate figures are not available in the censuses on the modal share of people travelling to workplaces *in Colchester*.

The 2021 census figures show a massive reduction in the public transport share of work journeys, but as they were only just after lockdown we will have to wait until 2031 to get data on the 'new normal'.

THE BAD BACKGROUND TO THE TCBGC

The Inspector will need to be able to understand the origins of the TCBGC, another subject not mentioned at all in the DPD documents. The location was not of course chosen by any logical thinking as to which locations would be most likely to enable

reduced car travel, but purely by the wish of the local Edwardian landowning family to profit from housing development (some on grade 1 agricultural land) rather than farming, in association with the local developer Mersea Homes. It was to be an ordinary car-based development with no pretensions, but when it was taken over by TDC and CBC ** it became a 'garden community' (the in word at the time) and morally superior. Similarly the Marks Tey and West of Braintree GCs were all purely developer / landowner promotions. The Section One Inspector rejected those two on financial grounds, and accepted the TCBGC as *financially* stacking up, but ignored all the practical problems with it. No consideration was given to the point that other places with *already-in-place* excellent transport connections might be a more sensible site to put a 7,500-9,000 house GC.

** The development was initially pushed by TDC and opposed by CBC as a blatant attempt to dump housing on the edge of Colchester so that TDC got the money and CBC got the problems. CBC then decided they were in favour of it a few weeks later! It would surely be more in Tendring's real interest to bring a large new economically-active population into east Tendring.

THE PREDICTED MODAL SHARE FIGURES IN THE DPD

The figures given in the DPD (p.95) are not fully explained, but reference to Transport Report 1 shows that they are actually *averaged* (mean average?) figures of the three different types of trip in the model (within GC, up to five miles from the GC, and longer distance). This averaging might be well enough when analysing the GC residents' overall transport habits, but the figures are very misleading in relation to the impact of all the extra GC traffic on the local main roads, because the very numerous *intra-GC* trips have a much lower car percentage and much higher active travel percentage, which swamp the ECC 'averages'. To be of any use, there should instead be separate modal share figures given on GC residents' (a) internal and (b) external trips.

The impact on local urban roads would best be seen by using instead the 'external up to 5 miles' trips (which would always mostly be via Clingoe Hill), viz:

		DPD average % figure	< 5 miles % figures
2033	Car	53	56
	Public transport	11	17
	Active	36	27
2041	Car	43	53
	Public transport	15	18
	Active	42	29
2051	Car	38	48
	Public transport	17	20
	Active	45	32

i.e. with the car share settling at a significantly higher level than the DPD's averaged figures would suggest.

The impact on local roads (which actually needs studying on the basis of GC population times modal split at each date) is considered further in Section 2 below.

These figures are of course also all based on the assumption that *all* the hopes of modal change come to pass.

MODAL SHARE IN THE LATER YEARS

The DPD documents give modal share figures up to 2041 and 2051, but previous reports have given them up to the 2060s and 2070s. But anyone who has observed transport change in SE England since 2019 will be aware that predictions can go badly wrong even in the very short term. Despite the fact that a downturn in public transport usage in London was already becoming evident, due to the start of working from home, in the late 2010s, the 'experts' continued to produce graphs with ongoing up curves that would have to be resolved by very expensive new rail schemes.

One can look at earlier times too to see the folly of long term predictions. In the 1830s nobody would have foreseen that a large % of local journeys in London would be made by train by the 1870s. In the 1940s it was still assumed that 'the working class' would never own cars. And we regard these periods as times when things changed more slowly than they do in the 21st century!

Yet the GC promoters want us to think they can predict what society will be like and what journeys people will make in thirty years time. Why so? Because the car share is still too high in the 2033 figures, and the only way of avoiding blatant overload in the later traffic forecasts is to produce ever lower car % figures as the growth of the GC continues. This is not prediction (which would be impossible anyway) but a mere *hope* that this will happen, because they *need* it to be so in order to push through such a big development.

THE LIMITED LIKELY SITUATIONS IN WHICH THE RTS COULD BE ATTRACTIVE TO CAR-OWNING TCBGC (and other East Colchester) RESIDENTS

Obviously those *without* a car will use the RTS, but informal experience of other new big Colchester housing developments, in their earlier years in particular, is that the population is even more car-minded than people in established areas are, as they are colonised mainly by people aged 25-50 with young children, with fewer than average 11-25 year olds and over-50s who are the main bus users. It would be helpful if the councils did *surveys* of who *actually* moves into new developments and what their *actual* travel habits are, which would then enable better decisions on the transport aspects of subsequent proposed developments; but this they will never do because it would expose what unrealistic greenwash is talked to justify ever more developments.

The propaganda is heavily focused on claims that using the RTS will be *quicker* than by car, with very little said about costs, yet it is known from Park & Ride experience nationally that it is the *lesser cost* of a P&R journey compared to central area car parking that is the prime cause of local residents choosing to use P&R. The same will apply to TCBGC car owners and the RTS. (Sometimes reduced journey time applies too, especially in the peak, and can be a bonus factor). At the moment, though, nobody knows what the cost of using the RTS will be, apart from vague promises that it will be competitive.

The DPD makes extraordinary claims about the journey time factor, e.g. the preface to Chapter 8 says that (all) 'day to day trips' will be 'quicker and cheaper without a car' (which is obvious nonsense); and p.92 that the RTS will 'offer faster journey times to key destinations than other means such as the private car'. The DPD itself gives no examples of how, but the ECC September 2022 presentation to councillors gave two examples which demonstrate the nonsense. Firstly that a return trip from Cuckoo Farm to the town centre would take 20 mins less by RTS than by car, and

secondly that a person commuting from the University to the town centre would save 45 minutes a week by using the RTS. The first ignores the points that nobody driving into the town centre by car would go via Cuckoo Farm, and the second that nobody does commute *from* the University to town **, and if they did they would in many cases have a long walk to the Knowledge Gateway stop to add into the equation. In any case one cannot make such simplistic comparisons because each person's individual situation would vary.

** The reason this unrealistic direction was chosen is no doubt because the delays on Clingoe Hill are worst in the am peak westbound, so the bus lane here would improve RTS journey times much more than the actual commuters *from* town to the University would experience.

The same presentation also makes the (wholly unsubstantiated) claim that the RTS service will be 'resilient at times of street works'. Road works (especially those involving single lane working on main roads) cause more disruption to bus users than to motorists, but unless the RTS buses have wings they will get caught up in them in the same way as any other bus! (In contrast, tram systems generally have under-street mains diverted away elsewhere, eliminating any delays from statutory undertakers' activities; and this is a significant % of their high construction costs).

Turning now to the situations where GC residents might actually find the RTS cheaper, more convenient, or faster to main destinations, the inward bus lane in Clingoe Hill could make the RTS attractive to those working office hours in the town centre and Middleborough, especially those not having free parking; also to anyone going to North Station because of the very high parking costs there. The Hospital would at all times be quicker by car via the A12, and even more so the Northern Gateway. The other major Colchester destinations, Severalls Park and Tollgate, would be very lengthy two-bus journeys by the RTS and far quicker by the A120 / A12.

University people currently using the existing bus services might transfer to RTS (depending on comparative price) to/from North Station and the Hospital, especially those at the west end of the University. But University car users (staff) get cheap parking and it has been made clear that ever more parking will be provided as the University expands, including two more MSCPs shortly.

Unfortunately there are no 'outer suburbs' in the east corridor, such as would provide good trade to an RT system elsewhere; and the other two stops at the east end, in St Andrews Avenue, do not serve any large number of residents or any main 'destinations'.

Of the major destinations that it was originally said the RTS must serve, two (the University and Hythe Station) ** are now only to be served at an inconvenient distance.

** Transport Report 2 pp. 12/13 refers to a 'multi-modal interchange hub' with (sic) Hythe station, or 'close to the station'. This is quite impracticable given that the RTS stops are over 300m from the station entrance, with the ordinary Tesco bus stops in yet another place. The developer is supposed to contribute £1m to the total 'hub' cost of £4m. Unless most London trains stopped at Hythe in future it would scarcely be worthwhile even if it were practicable. And as things stand anyone hurrying down from the RTS stop to catch an up train might miss it through finding the barriers already lowered.

PARK AND RIDE: WHY IT HAS FAILED IN COLCHESTER (and why any other attempts to get people out of their cars would fail similarly).

To understand the situation with this proposed P&R (P&C) site it is necessary to be au fait with the history to date of P&R in Essex at large, and Colchester in particular. It began in Chelmsford with the Sandon site, which was successful, followed by the Chelmer Valley site, less successful but gradually building up.

Although its own researches had shown that P&R was unlikely to succeed in Colchester because of the abnormally large amount of free employer parking (as discussed earlier), plus abnormally cheap all-day public car commuter parking, CBC pushed to have a P&R here too, and ECC foolishly agreed. After much debate on the best location it was put at the north site (Cuckoo Farm) and opened in 2015. The result was a disastrous failure which threw the ECC P&R budget into massive loss, just at the point when the combined Chelmsford operation was about to cover itself. It has also done absolutely nothing to fulfil its declared principal aim of reducing peak congestion (the buses at these times have an average of six users in the peak direction and 0 in the opposite direction). Shortly before covid I produced a full report on all this (attached, the only realistic account available to date). Although the emptiness of the buses Mon-Fri has become a joke amongst ordinary Colchester people, ECC and CBC officers and councillors are in complete denial on the whole thing, and still talk of how *more* P&R is needed in Colchester! (Although when the public is out of earshot ECC do berate CBC over their own central car parks offering abnormally cheap car commuter parking).

In the late 2010s ECC was losing £500,000 - £600,000 a year on Colchester, and had to abolish the previous free senior citizen P&R travel. Ordinary fares in Chelmsford were increased, increasing revenue but reducing usage, but there was no increase in Colchester where this was thought too risky – so Chelmsford people are now subsidising the Colchester failure *twice*, both in council tax and when they use their own P&R.

Since covid the use of all the P&R sites has fallen, not least in Colchester, where the principal actual use was by senior citizens in the interpeak period. (As noted earlier, Senior Citizen travel has fallen badly across the bus network more than other usage). An ECC press release in November 2022 stated that the year 2022/3 was expected to produce a £1.3 million loss, yet ECC remains besotted with P&R. This is the poisoned chalice that the RTS will take over.

In autumn 2021 a CBC Cabinet report finally admitted in writing that CBC itself had contributed significantly to the P&R's failure at peak times by offering all-day parking at only £3.50 in its most central car park (St Johns) **. A new parking policy document was approved under which *no* all day parking would be allowed at any price in its central car parks, but such is the lack of interest in correlating reality with policy that *at the very same meeting* it was agreed to continue the St Johns 'offer' - merely putting the price up to £4.00 to cover inflation since its introduction. The 'offer' has since been transferred to another central car park, Britannia.

One effect of the RTS replacing the P&R here is that it will remove the Colchester losses away from ECC onto the developer!

** CBC has not revealed how many people actually take advantage of this per average day.

WHY THE EAST P&R (P&C) SITE WILL FAIL

A second Colchester P&R site at A133 east had been inserted into the previous CBC Local Plan c.2008, but was struck out by the Inspector, following our objection, as being devoid of any rational justification. In the way of things in local government, it crept back from old drawers into the new draft plan, now under the excuse of the TCBGC.

ECC has (it appears) never done any survey of where the (few) Cuckoo Farm users emanate from, something which one might think any intelligent authority would want to do before talking about a second site (but again the 'we don't want to know about reality' factor comes in). To discover this I did a short survey myself at the town centre P&R stops in 2018, which showed that around a quarter of the ridership came from east Tendring via the A120.

The proposed A133 east (TCBGC) site is only 3-4 minutes driving time less, from east Tendring, than Cuckoo Farm. Most of its users would simply be abstracted from Cuckoo Farm – the only places that would provide *new* P&R traffic at this site (because they have no good access to Cuckoo Farm) would be Wivenhoe, Alresford and Elmstead Market. (It will not be reachable from the Manningtree area).

ECC has already considered a scheme to lease off part of the Cuckoo Farm parking area because they realise it will never all be needed, and now they are seeking to reduce the usage there further!

THE 'PARK & CHOOSE' CONCEPT

Of late ECC and CBC have taken to referring to the proposed TCBGC site as 'Park & Choose' rather than Park & Ride. Although some thought this was just a piece of flannel to avoid the association of 'P&R' with 'failure' in the minds of Colchester people, it was actually a term that had already been used elsewhere in the country, in respect of small sites where there was either no P&R bus service or people might be likely to want something else as well, e.g. a cycling option at National Park sites. The principal claimed purpose here has been that people might hire a bicycle, or get out their own bicycle, to complete their journey (although 'scoot' has now been added in everywhere too!).

The major question is of course what the addition of this 'choosing' aspect can do to reduce the traffic on Clingoe Hill.

The propaganda is focused on what people *might* do, rather than probing into why real individual people might actually *want* to do anything on this front.

A specific possible custom that is mentioned is University staff from Tendring leaving their car at the 'P&C' and then cycling, scooting or walking to their University office. But (as noted above) they have cheap parking at the University car parks. The University produces greenwash transport policy documents whilst actually remaining very car-based so far as staff are concerned; and it takes no interest in collaborating with others on improved public transport.

Still less likely is it that people will get out of their car here and cycle or scoot to work in central Colchester or other places at any distance. Only those who arrive in the am peak tailback period and *don't* have free parking would be tempted at all. In bad weather nobody would be tempted, but it is of course in bad weather that Colchester congestion is worst, especially Nov-Jan. Nor would shoppers have any urge to cycle in!

Infrastructure Report p.13 states that the P&C function will allow 'residents, workers and visitors to get in their car from home to the P&C site and then cycle from

there to destination'. 'Residents' presumably means 'GC residents', so this seems to go against the whole principle of reducing car traffic within the GC!

The financial aspects do not seem to get a mention. Essex P&R to date has been based on free parking at the site and paying to use the bus. If that were followed here, no revenue at all would arise from the 'choosers' (or from the Knowledge Gateway staff, who (per SMF p.52) will be using the same car park). If the choosers *did* have to pay they would somehow have to be kept separate from the RTS bus users, plus this would be a disincentive to modal changeover here, all the more so to those who have free parking in town.

If the 'choose' option were at all successful it would reduce still further the use made of the RTS buses as a 'P&R' service.

Since April 2020 when the empty roads and sunshine suddenly caused an upsurge in (leisure) cycling activity, ECC has been plugging cycling even more strongly as the solution to all problems, but the number of people who are actually willing to cycle any distance can be judged from the situation in Wivenhoe, which has had a traffic-free cycle route to Colchester many years now, and more recently a separated route to the University too. But the 2021 census figures showed the number of people cycling to work from Wivenhoe as only just above the 2-3% Colchester average.

(This of course also applies to the many references in the reports to increasing cycling in Colchester at large, notably in the Transport Report 2 'mitigation' proposals. One of the least likely of these is at p.14 of that report where it is suggested that people will cycle from the TCBGC to Severalls Park via Ipswich Rd, when they can get there in 10 mins by car via the A120.

DPD Policy 7F (p.100) says that the P&C site should act as a 'transport interchange hub with other bus services, to reduce traffic movements within the GC'. The interchanging concept is plugged without considering what actual such journeys might exist, and ignoring the fact that real bus users go out of their way to *avoid* changes of bus, especially if one or both services are infrequent or unpunctual. The only thing one can think of is people post-2040s coming from the top end of the GC and heading towards Clacton.

CONCLUSION: The modal shift arguments are reality-averse on too many fronts, most importantly so far as trips to outside the GC are concerned.

2. INCREASED TRAFFIC ON OTHER LOCAL ROADS

Neither the DPD nor any of the supporting documents appear to contain any tabulation or map showing the current flows and predicted future flows on the other roads in the vicinity of the TCBGC, although ECC must of course have such figures. Transport Report 2 part 2 has the main discussion on traffic impacts, but it only offers 2033 / 2041 / 2051 data on:

Highway [Junction in practice] Performance Plots (if all the desired modal change has happened).

Highway Volume Difference Plots (comparing peak traffic flows if all modal change was achieved with the flows if no modal change was achieved).

Highway Delay Difference Plots (comparing peak traffic delays, ditto).

There is not a full explanation of this data and some of the figures given are puzzling because of that.

It is revealed at p.36 that, not only do these comparisons depend on full modal change being achieved by GC residents, but also 10% of the car trips that both start and finish within Colchester have simply been eliminated from the model, on the claim that Colchester residents too will be using their cars less owing to the 'mitigation' measures making active travel more attractive. This is decidedly convenient to those wanting to show that disastrous overloading will not occur. Clearly the principal probings needed are regarding Clingoe Hill, Greenstead roundabout, and other main roads in east Colchester.

However, on top of that there has now been another drastic development in the revelation (since the DPD and all the reports were written) not only that the link road will not be fully opened by 2026, but also that no date can be given as to when the northern half and the A120 junction *will* materialise **. Thus the 2033 and 2041 figures at least now all need reworking on the basis of a one-ended link road that will force all GC traffic to Colchester and the world beyond (except Tendring) to go via Clingoe Hill. But it is understood that the councils do not intend to provide such updated evidence to the Inspector.

** The MOU (the sole source of published information on the new situation) gives no clear information on which section of the link road will be built immediately. One would expect such a document to have a map appended showing exactly which section they have agreed to build now, but instead there is just verbal vagary about it terminating at 'a roundabout south of Aliens Farm'. The link road plans (e.g. Transport Report 2 p.91) have always shown two intermediate roundabouts, one well south of Aliens Farm and the other closer to it but NW of it. (I understand from ECC, though, that the real position currently is that it *is not actually known* yet how far they will be able to build the initial section, and that consideration of this can only begin when tenders have been received shortly).

So long as there is no link to the A120, it does not matter on the *traffic* front exactly where the link road will end initially. (But if it does not go as far as the second roundabout, the employment area will not be achievable when intended).

Wherever the initial end point is, it still leaves the developer having to finance the very costly A120 junction (unless an external fairy godmother appears). And that will be 3-4 times the £21m figure spoken of so far. (The MOU wisely refrains from mentioning any sum!).

[The requirement on the developer to fund the second part of the link road, added on top of all the other things they have to finance, must surely require a full re-examination of the development's financial soundness].

3. RTS: NON-COMPLIANCE OF DPD WITH SECTION ONE, POLICY SP6

Policy SP6.1 requires the TCBGC DPD to include

'details of the design and delivery of Route 1 of the RT system', and a 'programme' (whatever that means!) on 'the integration of the Garden Community into the system'.

The definition of what is meant by 'Route 1' is given in SP6.2:

'Route 1 of the RTS as defined in the *North Essex RTS From Vision to Plan* document (July 2019)'.

This was the latest RTS document at the time of the Section One hearings. It is actually somewhat odd that the authors of SP6 should have thought that this document provided any 'definition' at all, given that the whole of the main section

between the town centre and Greenstead roundabout was still the subject of three different route options (p.30 fig 3.5). However, what *is* clear from the document (pp. 30-34) is that the section of the RTS within the TCBGC is to be regarded as an integral part of 'Route 1'. Thus the wording of SP6 clearly requires the DPD to provide details of *this* section as well as of the Cuckoo Farm - town centre - Clingoe Hill section. (Which is no more than one would expect at this advanced stage).

In fact the DPD does not give any details of the *rest* of Route 1 either (nor do any of the current reports). There is a map at Transport Report 2 Fig A5 (which is actually a map previously shown at the September 2022 presentation to Councillors, and with the same content as a July 2022 map). However, it cannot be assumed that this or other 2022 maps are still current. We understand that ECC are about to go to tender on the town centre - Clingoe Hill sections, which presumably indicates that final decisions on the works on the main route have now been made (although the changes to traffic signals etc may be excluded from the tenders as ECC will do them itself?). However the Inspector still needs to know what is involved on these sections, so that he can judge whether the scheme as finalised will be of sufficient impact to justify the claims of how many otherwise-car journeys will be made on the RTS.

With regard to the section of the RTS within the TCBGC, the situation is yet more unsatisfactory. The DPD (p.93, and policies map) show a route, different from that shown up to 2022, that seems to be fairly sensible, and which all but the most critical readers would probably think was the proposed route. However the small print says that this, like everything else on the maps, is purely 'illustrative' or 'indicative'. When questioned about any aspect of what is shown, officers simply reply that none of the content of these maps has any substance at all, and that the route of the RTS within the GC will, like everything else, be decided from scratch by the developer at a later stage.

Yet this still-positionless RTS is presented elsewhere as the vital spine of the GC! Obviously, also, the DPD *cannot* show how it will be integrated with the rest of the GC, when nobody even knows where it, or any other of the major GC elements, will be.

(The DPD *does* contain much general description of the *standards* to which the RT must be built with the GC).

Another vital aspect of the RTS on which no actual information at all is provided in the DPD or support documents is the A133 / RTS junction. This of course will have to be completed before the RTS starts operation in 2026, but we are assured that no thought has been given to it so far! Up to late 2022 all the (quasi-)maps had shown this junction as a separate one well to the east of Wivenhoe Park Corner, but the 2023 reports now show it *at* the Wivenhoe Park Corner junction, where there is also an access road to the north side Knowledge Gateway to be added to the current already-complex junction, plus the A133 car access to the P&R site. When anyone queries that there is no way that these three roads could be added into the existing junction (especially to give a north side to A133 westbound facility), the usual answer is given, that this is purely illustrative, there is no specific scheme to have a junction here, it could equally well be somewhere else, and it is up to the developer to decide later where it will be. It would normally be considered extraordinary that the Highway Authority should wash its hands over a junction with a high-speed dual carriageway!

The developer is expected to pay £6m to the cost of 'a' junction (indefinite article = indefinite plans). But as nobody knows yet where it will even be, it is impossible to know whether this sum is enough / appropriate. The whole length of the stretch of the A133 where a junction could be is dual carriageway, in some places with the two

carriageways well apart; so no simple junction is possible. If at Wivenhoe Park Corner it would probably require complete reconstruction as a roundabout.

A principal reason behind the failure to make any progress on this is the endless indecision over where the P&R site should be (see next section).

There is also conflicting 'information' on the positions of the RTS stops. The number and exact location of these will obviously affect the usage of the RTS. The various 2022 maps (including the reproduction of one of them at the abovementioned Transport Report 2 diagram A5) are again the latest sources, but they do not agree.

The Knowledge Gateway stop(s), which has to masquerade as the 'University' stop, is shown on some maps as by the Boundary Rd / Nesfield Rd roundabout (with the RTS buses diverting off the A133 and back). This is at least *inside* the University, a psychological benefit. But another map shows two stops on the A133 itself, not far off it is true, but more offputting, especially in the case of the eastbound stop on the far side of the A133.

As to the location of the stops within the GC, we know nothing.

Fig A5 (and its 2022 predecessors) shows no stops at Middleborough, North Station, and the Hospital; and extra stops at Greenstead roundabout and 'Myland'. One suspects this is all bungling (three times over!), although some other maps also omit Middleborough. The map in the July 2022 report to the Joint Committee shows an additional stop called 'Axial Way', although it is actually depicted to the west in United Way. This would serve the pending CBC leisure developments (referred to earlier) as well as the stadium. Given the limited traffic ever likely to accrue from the Cuckoo Farm P&R site, and from the Hospital stop (because of its 'back gate' position), it would indeed be a good idea to have further stops on this northern section at anywhere where traffic could be gained. But at the moment there is no solid information.

Further uncertainty relates to the RTS line to the Employment Area. In all documents up to 2022 this was shown as the terminus of the main RTS route, implying that it would have a full all-day service. The sketch maps in Transport Report 2 also show this. But the 'green' maps in the Strategic Masterplan Framework, and other recent maps, show only a dashed-line 'branch' route to the Employment area, implying a limited service. (Nothing appears in the key to explain this further).

Accordingly it is now quite unclear whether the developer is obliged to make this section, and what service should be provided if they do.

The 'green' maps (but not the Policies Map) also show a mysterious second dashed-line 'branch' along Bromley Road. This is new.

Finally there is the North Station 'express' service route via Cowdray Avenue. This is a relatively recent idea; the 2019 report shows instead a 'supplementary peak only route' from the north end of the GC *via the A120/A12 and NAR* to North Station. In principle, therefore, Policy SP6 requires *that* route (which did not require any works) to be provided! However, it would be inappropriate to demand that, given that it was made clear it was only an option being considered. It was replaced by the idea of running some extra peak buses via Cowdray Avenue, shown as 'Express Route' on the July 2022 maps, and still shown, as '*aspirational* express route to station', on Fig A5, but not on the Policies Map. (This route too requires no physical works). It is now quite unclear whether such a service must be provided or not. There has of course been a great reduction in London commuting post-covid and in consequence there is now less likelihood of it being worthwhile. It would be acceptable in practical terms if the DPD merely said that a peak service should be provided on this route if and when it becomes appropriate in relation to the North Station usage on the ordinary route. But it ought to say *something*.

So far as 'delivery' is concerned, one notes that there is still no information on the RTS operating model. The only comparable services to date, the Chelmsford and Colchester P&Rs, have been run on the basis of ECC seeking tenders from commercial operators to run the service over a period of several years, with the operator providing the buses and staff, and ECC carrying the losses. However it is hinted in various 2023 documents that the RTS buses will be owned by ECC. An RTS 'outline business case' was promised by February this year but has not appeared.

CONTINUED INDECISION ON THE P&R (P&C) SITE LOCATION

Extraordinary dithering has been displayed on deciding the site of the P&R (P&C). So long as this continues, the *route of the RTS* cannot be decided, making it impossible to fulfil the SP6 requirement on this ground alone.

Until recently there had been uncertainty over whether to have the site at the A120 end of the link road or the A133 end, or (extraordinarily!) have one site at each. However in 2022 it seems to have been decided to have one site, on the A133; and now that it has been decided to postpone building the top end of the link road and the A120 junction 'until further notice', the A120 option is out of the question anyway.

However the issue has now been gratuitously re-complicated by the idea of having a 'temporary' site, followed by a 'permanent' site. There is no sign of any explanation of *why* it should be thought necessary or desirable to do this, greatly increasing the total cost. Nevertheless Transport Report 2 table 1.1 (p.7) *requires* the developer to provide a 'temporary P&C site' in 2026 as part of the first stage of the RTS within the GC, and then in 2033, as part of the second phase, to fund

'a Park & Choose aligned with Mobility Hub concepts, and support the shared mode costs and maintenance in this location which supports access between the P&C and the GC'

(if anyone can work out what that means!).

In contrast p.5 of Transport Report 2 merely says that

'it is *hoped* that the developer might introduce a temporary P&C facility in the first phase prior to 2033, even though an allowance to make the facility permanent is only suggested in phase 2 because it is at this point in time that the P&C is required to mitigate transport problems'.

The inclusion of such mere 'hopes' in a DPD is odd, all the more so when it is said here by the LAs themselves that it isn't actually necessary to have the thing that it is 'hoped' will happen!

(So is it required to have a site from the start of the RTS in 2026, or not?).

Other documents are very contradictory:

- The Policies Map shows the 'broad location' of two alternative P&C sites, one north of the A133 at the Wivenhoe Park Corner junction, the other south of the A133 in the Sports Park area (which is not on any RTS route currently shown or conveniently possible). It does not refer to temporary and permanent sites. P&R sites and sports parks both take up a lot of space, so having both in the same place seems optimistic.

- The SMF map shows only one position, on the north site at Wivenhoe Park Corner. However the text at p.52 says that 'there are a number of options on location'.....'including in the sport and leisure park'. At p.55 there is a further discussion of location, but here the alternative site is in a different place, on the north

side opposite the Sports Park, with an additional RTS halt adjacent. The SMF too makes no reference to temporary and permanent sites.

If one asked about all this endless inability to progress a simple matter, one would presumably get told that it is entirely up to the developer to decide where the site should be anyway!

CONCLUSION: The DPD and reports are too lacking in detail on RTS matters to be able to judge fully its potential effectiveness and viability. Even if there were not a Section One policy requiring this detail, the continued vagueness at this late and last stage would render the DPD inadequate.

4. PROPOSED MISUSE OF RTS FUNDING (NEW MATTER)

It has repeatedly been emphasised that the £31m of RTS money within the HIF grant is ring-fenced and cannot be used to any other end. However it is now suddenly stated in the MOU (section K) that:

'ECC will, to the extent available and to the extent that they are able to, use any remaining HIF money not required on phase 1 of the link road and the RTS to de-risk the second phase of the link road as far as possible, including by assembling the land required.....'

Has this abstraction of RTS money been secretly agreed with the government? (No such change is mentioned in MOU section I, though).

The RTS works to be done in 2023-6 are only the first phase of the more comprehensive subsequent bus priority works that have been repeatedly referred to in all the earlier reports on the RTS, some of which are also listed in Transport report 2 as to be done 2033+, financed by the developer. But if there is to be spare RTS HIF money, it should surely be used to bring forward these further works.

(The DPD and supporting documents texts need amending in various places to cover the new MOU situation, but again it appears that there is no intention of doing this).

5. START DATE OF RTS

The DPD contains a new evasiveness on the start date of the RTS. It has been stated hitherto, and is still stated elsewhere, that the RTS will start running in 2026. Section One SP6 requires that 'sustainable transport measures be in place from first occupation', and this wording is repeated in the DPD itself at p.91. (It is presumably not claimed that this means 'except the RTS!'). Currently also, the Infrastructure Report p.13 states that 'the RTS will be operational on first occupation of homes'.

However the DPD policy has weasel wording. 7C says that there must be 'a convenient and high frequency bus service operating that is *aligned with* the first phase of the GC'. (This can only refer to the RTS, as no other bus services will be provided until phase two). And 7D states that the RTS operation must commence '*during* the first phase of the development'.

These wordings would clearly allow the developer to postpone the start of operation until *near the end of Phase One* and they must be altered to be compliant.

DPD Policy 7C also requires the developer to 'safeguard' and then provide other 'segregated public transport routes' to be used post-2033 by other bus routes. It is not obvious how the developer is supposed to know where such further services might be desired in future, and, given that the GC itself will not be a place of traffic jams, it would be simpler to require that all the principal roads within each Neighbourhood are suited to bus operation, something where there has been consistent failure in other recent large Colchester developments, even in cases where ECC has defined a 'bus route' through them.

6. RTS REVENUE SUPPORT

At the Section 1 stage it was said that the RTS could cover its costs from the start in 2026, but that unlikely claim has now been abandoned. Transport Report 2 pp. 30/31 requires the developer to provide £2m subsidy in 2026-33 and a further £2m in 2033-41. This works out at £265,000 p.a. average in 2026-33, and £250,000 p.a. average 2033-41. Compare that with the £500,000 - £600,000 annual loss of the north section alone (Cuckoo Farm P&R) pre-covid, which is now almost certainly greater. It is true that the north section as part of the RTS, and with several additional stops, will have more users per day, but the RTS will require (say) three times as many vehicles to run (being over a longer distance and at higher frequency) and has a particular problem in the first years when the population of the GC is very low.

(Previously, e.g. July 2019 report p.20, it was claimed that the P&R traffic from the east on the RTS would help make it viable in the years before the GC population grew, but there is no mention of this in the current documents).

Unless there is an undertaking from ECC incorporated into the DPD to make up losses in the early years beyond the developer's contribution (just as they have massively subsidised the P&R to date), the RTS does not have a 'sustainable' financial position.