

HEARING STATEMENT from Peter Kay

Updating the content of the 2017 representations (C-BUS and part of WTC)

NOTE: *The C-BUS objection sections on Part 2 matters can be treated as still current, except that the DM20-DM22-SP8 section on Park & Ride is out of date and replaced by the content here, as is the first part (Parking Policy) of the DM20 content. **Also** manuscript updatings have been made on two further pages, which are attached here.*

The WTC objection transport content has been separately resubmitted direct to you earlier today, again with a few manuscript updatings, in case of it not having been given to you by CBC.

starts

The transport policy, for Colchester at large and for individual areas, is heavily reliant on the (always unrealistic) notion that more Park & Ride and 'Rapid Transit' would serve to ameliorate the impact of ever-increasing population growth. This serves to avoid facing up to difficult facts.

The **P&R** claims go back to the days before the service was commenced, when only the handful of people (including myself) *who had actually looked at the facts* knew that it could never be successful, but now there is ample proof of that from the observed usage over 5 pre-covid years, **as detailed in my P&R paper pages attached.**

The claims for **RT** were made at a time when it was to consist of a network, with much full segregation, across the whole of North Essex, and when glossy pictures of trams adorned the propaganda. Now it is reduced to a stub between the town centre and the TCBGC, with no bus priority at all (except in mere aspirations) in the places where congestion exists, and with ordinary buses, not meeting in any way the definitions of 'rapid transit' set out in ECC's own reports. *Plus* the existing massively-loss-making P&R route has been added to it as a weight to drown it quicker.

P&R and RT are indeed now highly intertwined, firstly because of combining the two in the proposed service pattern, and partly because one of the main reasons for their wanting a further P&R site by the TCBGC was that they could thereby claim that a hoped-for large *P&R* usage of the East RT buses would make up for the sadly-low level of usage from the small number of GC residents prior to the late 2030s. Whereas in reality it is clear that $\frac{3}{4}$ of the people who might use the East P&R site would be people in East Tendring who are *currently using the equally-convenient Cuckoo Farm site*, so that the usage on *that* end of the service would go down, **result** another £6m wasted on a new P&R site and minimal increase in overall income! (It is now unclear whether ECC still wants two or only one P&R sites at the TCBGC).

Park & Ride Report

The first two pages of the Summary only are attached. The *evidence* for the statements in the summary is to be found in the rest of the report, which can be provided if desired.

The report was written in late summer 2019 and so is fairly up to date, however further things have happened since then:

- Impact of Covid (longer term). I do not know what guidance if any has now been provided as to how Local Plans are to be dealt with in this light, but one thing that is obvious is that the impact on *public transport* use and viability will be much more significant than in most areas of life, both because of work-life changes and because of increased fear of closeness to other people. (With cars and roads there is no 'problem' from reduced use, indeed it is a benefit! – but with most bus services being on low profit margins, the loss of even a small % of users can be disastrous). The 'fear' factor will particularly affect P&R, as by definition all users can travel by car instead. A recent ECC report (on retendering) suggests a £1-£2m loss p.a. in the next years on Chelmsford & Colchester P&R, 2-3 times the already very bad loss level. Combined with a likely worse crunch in LA finances, it will be as much as ECC can do to keep the previously-almost-profitable Chelmsford routes going!

- Charging for Senior Citizens. This had to be voted for in 2019, principally because the great loss in Colchester destroyed the previous ability to 'carry' free SC travel on the back of the paying users. Of course the covid situation means that the impact is not yet known, but ECC pre-decision surveys showed that 720/1194 Colchester P&R SC users stated they would stop using P&R if they had to pay. That would mean near-empty P&R buses in Colchester *all day*!

- CBC Parking Policies. As the report explains, whilst *free employer parking* is the main reason for the tiny % of paying P&R users in Colchester, CBC has always exacerbated this by ultra-cheap all-day parking in its own car parks. A recent CBC report on a revised parking policy, approved by Cabinet, states that as a *policy* all-day parking should no longer be available in the central area. But the hypocrisy (or is it complete cluelessness?) of CBC was shown when *later in the very same meeting* they approved the RETENTION of ultra-cheap all-day car commuter parking in the *most central* CBC car park (St Johns), merely updating the price from 3.50 to 4.00 in line with inflation since its introduction, (That shows how much trust can be put in the claim in this report that they will also now DO something about the free employer parking – which would in any case be very difficult *politically* in 'motorist' North Essex!).

** Given the unlikelihood of P&R ever being able to achieve anything in Colchester in the plan period, refs in 7.104 and 7.121, and DM 20 and DM 22, need removing. (It is unclear whether, if these refs were left in, they could be legally seen as enabling CBC to claim that any *particular* site for another P&R is 'approved' by the Plan?).

OTHER POINTS RE RAPID TRANSIT

Policy NC4 says that the Northern Approach Road busway already has funding secured from the Severalls Hospital developers. However as shown in the new ECC consultation document (appendices B/C), they are now (for reasons not known) looking at three options for this, two of which do NOT involve it being made on the space left for it on the west side of the NAR. A recent ECC internal report stated that they fear the developers could successfully get out of the s.106 money if it is *not* to be for the west side option that was agreed with them. Thus the money is no longer regardable as secure.

6.94 has a statement that the RT will serve the University, but ECC have of late been looking at options via the A133 not going into the University (and still are, per the new document). It should be noted that if the RT *did* go via the University, it would abstract large numbers of users from the current First commercial routes, and if First did not get the contract to run the RT they could initiate court action against ECC for using a publicly-funded service to undermine a commercial service. In contrast if it did *not* go via the University, it would have far too few users until the GC population builds up in the 2030s!

It will be noted that all recent discussion of what the RT route should be divides it into 'west of Greenstead roundabout' and 'east of Greenstead roundabout'. This of course is an attempt to cover up the fact that they have no idea what to do *at* Greenstead roundabout, the worst congestion point on the route! The only plan for (minor) improvements here is that drawn up for the Sainsbury's supermarket planning application and since seemingly 'adopted' by ECC. Otherwise questions about further improvements here always get the answer that they are 'in an early stage of development'! Reference has been seen to RT buses going through the middle of the roundabout, in a manner so horrendous that it is not surprising that no actual plan showing it has appeared in public!

There is no possibility of bus priority being achieved at most of the places in Colchester where it would be useful, unless many properties including listed buildings were demolished, because the roads at the vital points here are not wide enough for a third lane. This of course is why many years of consultants' reports have never produced actual schemes, instead merely waffling about things maybe being possible 'in the longer term'!

Of late ECC have started talking about a 'Park & Choose' site at the TCBGC, not a 'Park & Ride' site. This was presumably motivated by the way in which 'P&R' has now become a joke in Colchester! The 'P&C' term was invented elsewhere as a description for non-central car parking places in smaller towns (where a bus service would not be viable), whence people might walk or cycle into the centre; it has also been use for parking sites on the edge of rural attraction areas. The ECC waffle cannot disguise the fact that nobody arriving by car here is going to decide it will be better to abandon it 3-4 miles from their destination and instead walk or cycle into town via Clingoe Hill! (rather

than 'ride' a bus) – so that whatever anyone 'chose' to do could not have the slightest impact on reducing car traffic levels in East Colchester.

(Re East Colchester traffic situation): Policy EC4 claims that there will be 'improvements' to Greenstead junction (sic), Elmstead Road junction (= Tesco roundabout), Colne Causeway, and Haven Rd / Hythe Quay, but no plans for such are known, nor is it clear whether it means 'improvements' to get more cars through or improvements to reduce the horribly anti-pedestrian nature of the local environment!

This is followed by supposed 'enhancements to the interchange at Hythe station' (meaning the work already done? or some new thing not yet invented?), plus the extraordinarily vague 'improvements to existing public transport services, including the potential for extension to existing services and new routeing'. Whatever that might be about, it will certainly not be something achievable under the control or influences of *CBC*!

So the great majority of the EC4 wording is nothing but pies in the sky.

ends

SUMMARY

From 2006 Essex County Council [ECC] developed a P&R operation in Chelmsford, the initial site at Sandon being followed by the Chelmer Valley site in 2011. The latter had a slow start which caused a financial wobble for a couple of years, however the overall situation in Chelmsford has been successful both in achieving the policy objective of reduced car usage at peak periods, and in keeping down the annual subsidy requirement (few UK P&R schemes operate without some subsidy).

In 1996 a report on central area parking by JMP Consultants for Colchester Borough Council [CBC] warned that a P&R service in Colchester was unlikely to be successful, because of the very abnormally high number of town centre workers having free all-day parking in private car parks owned by employers / institutions. Only some 25% of all-day parking was in public car parks, so even if the price of parking there were to be ratcheted up to induce transfer to P&R, the level of possible transfer to P&R in Colchester was far less than in a typical town where the majority of all-day parking was in public car parks.

Despite repeating these warnings, the much-vaunted *Colchester's New Transport Strategy* document of 2001 also claimed that 'a strong case can be made out for P&R', and proposed P&R sites at Stanway (west) and Cuckoo Farm (north). It did not actually explain what the 'case' was, and the private parking problem was dismissed with the mere *aspiration* that employers would introduce 'travel plans' under which they would only allow staff with special needs to park. The Council did not of course have any means of enforcing that.

A scheme for a 'Stanway' site at Eight Ash Green was proposed by ECC in 2006 (with Cuckoo Farm intended to follow quickly after), but the site met with great local opposition and the scheme was abandoned in 2007. ECC's stated reason for withdrawing it was that further usage studies had shown that the demand from the west was too low (effectively an admission that Colchester could not support two P&R sites).

Instead planning was concentrated from late summer 2007 on Cuckoo Farm, now to be on a new site north of the A12 rather than by the originally-intended site next to the new stadium. A 2007 report from consultants Mouchel envisaged a demand of 930-1,210 users a day, however this was based on an unrealistically low fare and on the assumption that 60% of the peak usage would be London rail commuters to/from North Station. Whilst Chelmsford P&R had achieved a good London commuter usage, the situation in Colchester was less practicable on this front, both in respect of the points of origin of most commuters, and with no means of people getting back to their cars after 1900 - but this was ignored.

A further Mouchel report in 2009, using higher fares in the model, saw the predicted usage down to 666 per day (with no reference to destination). However when ECC submitted a planning application for Cuckoo Farm in 2011, the higher 2007 figures were used! But as the application was submitted for decision to *ECC itself*, there was no chance of any rational criticism of the scheme being listened to, anyway.

Cuckoo Farm eventually opened in April 2015, and it became clear from the start that the usage was going to be less than predicted, and in particular that the Mon-Fri peak usage was very poor. (The latter of course being for the reasons that JMP had identified in 1996!).

Despite having demanded throughout that ECC must provide a P&R service in Colchester, CBC has never supported it in the event. It is the most basic fact of P&R operations that they can only be well used if the alternative of public parking in the town centre is noticeably more expensive. **In Colchester, with P&R already crippled by the high level of private parking, CBC has stuck**

more nails in its coffin by deliberately retaining abnormally cheap all-day parking in its public car parks (only £3.50 at St Johns St and Middleborough), plus relatively cheap shopper parking.

In consequence Colchester P&R is used principally by Senior Citizen free pass holders, in the 0900-1600 period, as only those who can travel for free on the P&R buses find it cheaper than parking in town. 65% of Colchester P&R users are Senior Citizens passholders compared to 25% in Chelmsford.

Colchester P&R is very aberrant not only in having more users in the Mon-Fri interpeak period than in the peaks, but also in having more users on Saturdays than Mon-Fri. The reason for the latter is not understood.

/ by myself - ECC have never surveyed on these practical facts of usage

A survey carried out in autumn 2015 showed that:

- The principle areas of origin for Cuckoo Farm P&R users were east Tendring via A120, south Suffolk via A12 and A134, and the north Colchester urban area itself (all much as might be expected).
- Some 70% of users are female. (Most UK P&Rs have more female users than male, but the very low level of male usage here seems to reflect the especially strong unwillingness of 'North East Essex Man' to be detached from his car. Of the 115 people surveyed, only 3 were males under 60 who had previously driven into the town centre by car.
- The service (which has generally run fairly reliably) was well liked by the great majority of those who *do* use it. (The fact that most travel for free must have some bearing on that, though!).

An ECC survey in 2017 showed that 61% of Cuckoo Farm users were travelling for shopping, 15% for leisure, **and only 16% for going to work.** (Compare the Chelmsford figures of 35% shopping, 46% travel to work in Chelmsford, and 15% London commuters).

After four years Cuckoo Farm had 120,000 users a year in 2018, or around 360 a day Mon-Fri. Compare the Sandon figures of 343,000 (1,200 a day) in its fourth year 2009/10 (and the *predicted* Cuckoo Farm figures of initial usage of 666-1210 per day).

Colchester P&R has failed, both in the policy objective of reducing peak traffic problems, and in its inability to run without large ongoing annual losses. It has essentially become a system for giving 'free parking' to car-owning Senior Citizens at times of no congestion. (It is of course not the Senior Citizen users who are to be 'blamed' for this situation, but the peak period non-users!). **The losses on Colchester P&R are greater than the total cost of all ECC's ordinary Colchester bus services for people without cars, which ECC is now starting to cut.**

Because of the disastrous financial results of the Colchester scheme, ECC has been forced to abandon the policy of charging the same at all P&R sites. Colchester is still £3.00 a day as fixed in June 2015, because ECC dares not increase the charges for fear of reducing the low usage still further; whereas in Chelmsford there were increases to £3.50 in 2017 and £3.60 in 2018. Chelmsford people who are willing to use P&R are now effectively being made to pay for the Colchester failure. (These increased fares have produced a higher revenue in Chelmsford but at the expense of a 10% reduction in usage).

In 2018/19 Colchester was responsible for 96% of ECC's total P&R loss (£509,588 compared to £23,279 for Chelmsford). ECC is now being obliged to enforce negative changes generally, including abandoning the Saturday service at Chelmer Valley and introducing charging for passholders.

ECC has now recognised (internally) the failure of Colchester P&R, a 2017 report proposing that sections of the Cuckoo Farm site be leased off for other purposes, as there will never be a need for the 1,000 P&R parking spaces.

(Roberts Rd service ceased 2019).

- New housing between Mill Rd and Axial Way. Mill Rd was already served by very frequent commercial routes so no action required by CBC/ECC. However, despite the fact that this section of road was virtually rebuilt in connection with new housing on both sides, ECC still failed to provide an outward bus stop in a convenient position. When we and others requested one we received the now-usual response that Highways will not allow it, because 'the manual' includes rules that can be used for objecting to all possible sites. Several years on, however, the new stop suddenly appeared this year!

- Olympic Boulevard. Road laid out with bus gate for intended bus service via the new Severalls Hospital development, but this service will not commence until long after occupations, and the bus gate has already made residents anti-bus. In the meantime the Mill Rd buses can be used.

- Lakelands Phase 2 (in progress). Bus service still not started months after the first area was completed and occupied, again because developers are retaining a vital section of road as a works site. No bus stop infrastructure has been installed in the completed section as required by policy, and motorist-resident opposition is likely if service does ever commence. Route 4 running hourly along another road nearby but no stops there either. Access to frequent route 65 currently is very poor.

Road opened and stops installed late 2017. This would enable main route 65 to be diverted via Phase 2 at no extra operating cost. But 3 years on still nothing happened! MD of First Essex told us last year that he 'hadn't got time to think about new housing developments'!! (This is the main operator in 'Britain's fastest growing town'!) (Says it all, really!)

- New housing west of Turner Rd south of Hospital (Stanford Rd etc). Frequent services already existed along Turner Rd so no CBC/ECC action was necessary.

- Severalls Hospital redevelopment (construction just started). Only one pair of bus stops permitted to serve the whole development leaving many houses 400-600m from a stop. No reason why a second pair of stops cannot be provided at the east end, but CBC does not believe in the national guidance on stop distances.

Very large no. of houses now completed, no bus service in sight!!

- Rowhedge Port (in progress). Plans as submitted showed a bus turning point in the centre of the development and arrangements were made for route 66 to be extended there. However by the time the planning permission was granted the bus facility had mysteriously disappeared, and no service will now be possible.

- New developments west of Mile End Road (pending). A massive amount of 'planning' has gone into this major development, however the last plans seen involve bus stops at great distances apart leaving many residents with long walks to stop above the national 400m guidance.

- East garden development (initial planning stage). Even in this most recent and special case where mass conversion of motorists is relied upon, the consultants' reports are still referring to an aim of having bus stops *within 800m* of all housing, i.e. a far worse situation than the national guidance for ordinary developments. This is a fundamental matter in the planning of the new settlement yet it seems that CBC is incapable of giving its consultants proper instructions, or is itself still committed to inferior provision.

In all these years only *one* s.106 new service has actually materialised in a serious way, the 63 to Berechurch Hall Rd, financed by the garrison developers and later extended to New Braiswick Park (Tufnell Way) by First off their own bat after the s.106 money for there failed to appear. This ran every 20 mins during the supported period but had not generated enough traffic to be taken over commercially, and now exists only as a minimal ECC-supported-service with very low usage by the new residents. (Hourly services on town routes will never attract fare-paying passengers). On two occasions usage was obstructed for several months on end by ECC road works (improvement of Berechurch Rd) – this is not to be dismissed as an unfortunate one-off, as it is inevitable in a town committed to growing beyond its capacity that there will be more bus-disrupting road works than in a typical town, especially in those areas undergoing development.

The new estates built since the 1990s, in the new age of councils perpetually talking of their supposed support for public transport and the need for less car use, in fact have a much worse record for gaining good (or any) bus services, than those of the 1970s and '80s when councils happily dismissed buses as irrelevant in the age of the car. (Further content on this can be found in the Wivenhoe Town Council response to SP7).

actually done so, and the likelihood of CBC/doing anything is zero; they just want to carry on pretending that the situation does not exist.

PARKING ON MAIN ROADS

The one field in which CBC do have direct control (in combination with ECC) over transport matters, the North Essex Parking Partnership, reveals CBC as well as ECC adamantly supporting the 'rights' of car-owners to obstruct bus operation by leaving cars on the highway in large numbers. NEPP's official written policy instructions require them to secure the efficient flow of traffic at large, and on bus routes in particular. The *de facto* policy is that they allow 100m+ stretches of continuous parking completely blocking one side of the road, even on A and B roads, and will not remove even one or two of the parking spaces to serve as 'passing places' unless the immediate residents who use them vote by a majority in favour of them being removed! The needs of other road users are not taken into account at all. We have *written proof* of this real policy from the lowest NEPP officers right up to the ECC Portfolio Holder.

REDUCING THROUGH TRAFFIC IN TOWN CENTRE

This is under the control of ECC not CBC. After decades of talking, CBC with ECC agreement eventually introduced a High St ban, but it was immediately terminated by the ECC Portfolio Holder. It has since been replaced by a ban on general traffic up North Hill but which still permits Head St / High St / East Hill to be used as a through traffic route.

In 2020 ECC suddenly introduced a High St all day 'car ban' as part of the 'instant' covid street changes. But this is totally unenforced, and my counts in early autumn showed 100-120 cars an hour still; it has become another

BUS STATION 'ENHANCEMENTS' Although the *passenger facilities* at the so-called 'bus station' could be improved (not difficult, as CBC insisted it should have the worst facilities of any new large town bus station of this century!), the difficult problem is with its lack of capacity, which cannot be dealt with in any evident fashion. As the town expands the number of buses per hour has increased and will continue to do so. Already a large % of buses do not stop at the correct stop.

Colchester transport 'joke'!

CBC itself deliberately reduced the bus 'space' in the town centre by selling off the Queen St bus station, which had plenty of expansion space, in order to make money for itself (although in fact the only thing actually built on it so far is the massively-loss-making Visual Arts Facility). Just another case of *de facto* policy bearing no relationship to the policies put in plans!

TRAVEL TO WORK

There is no recognition in the plan of the two major factors encouraging car travel to work in Colchester:

(1) the abnormally large number of free employer parking spaces in inner Colchester, as described above.

(2) the moving of jobs, under local authority 'planning', from the inner area to peripheral industrial estates, which are far more conveniently accessible by car (with free parking) and far less conveniently by public transport. (This of course is a national trend). CBC wishes to continue this, openly enthusing (6.27) over new peripheral North Colchester sites as being the 'best located and connected' because of their closeness to the A12. CBC's policy seems in practice to be that one locates employment in car-based locations and then puts on token bus services. How vain that hope is is shown by the fate of the new ECC service 11 commenced in April 2016 to serve Axial Way etc. The average loading is 0 or 1, and in the pm peak the service is wholly unreliable due to the delays caused by the massive numbers of employee cars leaving Severalls estate workplaces 1700-1745!

This is not a readily solvable problem, but pretending that things can be achieved by waffling about travelplans etc is merely a smokecloud to cover up the fact that local authorities themselves have created mass car-dependency.