



Our ref: Colchester  
Your ref:

Colchester Borough Council

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14 Jan 26

Dear Sir,

### **Pre Reg 18 Consultation Colchester Local Plan**

National Highways welcomes the opportunity to provide comments on the 'draft Local Plan 2041 or the 'Preferred Options' for Colchester.

National Highways 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.

In responding to local plan consultation, we have regard to Dft Circular 01/2022 The Strategic Road Network and the delivery of sustainable development (the Circular) which sets out how interactions with the Strategic Road Network should be considered in the making of local plans.

In addition to the Dft Circular 01/2022 the response set out below is in accordance with the National Planning Policy Framework (NPPF) and other relevant policies.

Based upon our initial review of the reports and other supporting documents available to us we have identified the items below, where we require further information and or clarification to help in completing our review of the draft plan.

The plan commits to the delivery of approximately 20,800 homes and 41.7Ha of employment land over the plan period.

At present, based upon our review, National Highways is unable to determine whether the level of growth proposed can be accommodated on the SRN, as the transport evidence base and the Strategic Transport Assessment which support the plan are

still being developed. While we have been involved in a number of meeting and discussions to date,, these have not yet reached a conclusion

It is anticipated that a final transport evidence base will be submitted in support of the plan. The provision of a robust transport evidence base will allow National Highways to work alongside the Local Highway Authorities using a clear and defined Reference Case. This will support the planning of mitigation measures to address the impacts of future developments, enable infrastructure delivery to support growth and identify appropriate mitigation alongside a strategy for funding.

Notwithstanding the above, work undertaken to date indicates that a number of locations on the SRN are already under stress, with particular concern at A12 junctions 25,26,28 and 29. In addition, sections of the main line are forecast to operate close to capacity during the plan period. A strategy to address these issues is currently being developed. National Highways also has concerns that the trip rates applied within the model may be optimistic and therefore could underestimate the impact of the Local Plan on the highway network. We note that not all forecast growth arises from the proposed Local Plan and that network conditions would remain challenging even in the absence of the Plans growth.

The work to date has assessed two scenarios, including one incorporating the A12 J19-J25 DCO improvement scheme, the funding for which was formally withdrawn in the summer of 2025. This change has necessitated a review of the Local Plan and its supporting evidence.

We welcome and fully support the Plans commitment to the delivery of an integrated and sustainable transport network, including measures to encourage modal shift to public transport and active travel. We recognise, however, that achieving a meaningful reduction in car dependence will be challenging. We welcome the commitment to Bus Rapid Transit, and emphasise that if development within the Plan is to come forward in a sustainable manner, the timing and coordinated delivery of development supporting infrastructure will be critical, noting that this remains a significant challenge for plan led growth.

### Environmental transformation and climate change

It is noted that the submitted draft Local Plan and the identified site allocations will increase the number of residents living in close proximity to the SRN. As a result, it is likely that these locations will experience increased exposure to noise pollution from the SRN. National Highways will not support the provision of noise barriers located on its land as part of mitigation proposals.

The close proximity of development to the SRN also raises the potential for exceedances of air quality standards for which extraordinary measures such as a

permanent speed restriction may need to be considered. While it is acknowledged that air quality is expected to improve over time with the increasing uptake of fully

electric vehicles, this cannot be relied upon as the sole mitigation measure during the plan period.

Although several policies within the local plan require development to reduce impacts on or improve local air quality, these provisions do not clearly address impacts arising specifically from the SRN, nor do they set out how any required mitigation would be identified and delivered. We will continue to work proactively with yourselves on these matters, however, we would recommend the inclusion of a specific policy mechanism that clearly identified:

- how air quality and noise impacts associated with the SRN will be assessed and monitored: and
- The range of potential interventions that may be required should adverse impacts be identified.

In addition, National Highways will not accept third party connections into its drainage systems. Development proposals must ensure that no additional surface water run off is discharged to the SRN drainage network. Where necessary, drainage capacity will need to be fully assessed and upgraded by the developer to ensure no adverse impact on the SRN.

### Health and Wellbeing

We support the policies which set out requirements for new developments to deliver inclusive, active and environmentally sustainable modes of travel, including measures to promote road safety and to manage the negative effects of road traffic on sustainable modes. We look forward to continuing to work collaboratively with you to facilitate such travel particularly where there is an interface with the SRN.

### Lorry Parking

Lorry parking is a national problem, with particular pressures evident in East of England. National Highways would therefore welcome the investigation and allocation of a dedicated lorry parking facility within the Local Plan, ideally located in close proximity to the SRN. Where this is not achievable we would support the inclusion of a policy requirement for adequate lorry parking and overnight layover facilities to be provided as part of proposed employment sites and roadside service facilities. For context, we enclose a copy of AECOM report dated June 2019 (Appendix 2) which sets out the background evidence underpinning this request

### **Eight Ash Green and Copford,**

National Highways is willing to work with the council and developers to explore opportunities to bring these sites forward. However, A12 J26 is currently operating very close to capacity and options for physical highway improvements at this location are extremely limited. The acceptability of development at this junction will therefore depend on whether queues on the slip road can be effectively managed to prevent interference with the A12. If this risk cannot be adequately mitigated, National Highways reserve the right to object to development at these sites, on the basis that it could give rise to a severe highway safety concern.

### **Marks Tey**

The Plan identified three large site allocations. While the level of development proposed within the plan period does not represent the full quantum of development promoted for these sites, the principal of significantly larger scale development is established through allocation. Capacity on both the A12 and A120 is extremely constrained, and these corridors are not capable of accommodating additional growth without significant intervention. While it is acknowledged that Local Plan growth is only one contributory factor to existing and forecast congestion, there are currently no proposals for capacity enhancements on either route

Furthermore, development in close proximity to these corridors constrains opportunities for future improvements, particularly in the vicinity of A12 Junction 25, where land availability and operational flexibility is limited.

National Highways remains committed to continue to work with your authority in a collaborative and constructive manner to support the progression of the plan. We will continue to work with you to develop a clearer understanding of the impacts of proposed development upon the SRN and to explore whether, and how, such impacts could be accommodated.

We trust the above comments are helpful in informing the progression of your proposals and welcome continued engagement and discussion with the council on these matters.

Yours faithfully



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