



*The Ipswich Road and Harwich Road  
roundabouts, Colchester*

*A Formal Complaint to Essex County Council*

*By Will Bramhill, a member of Cycling UK and Colchester Cycling Campaign*

*January 15, 2018*

*I am grateful for the help received with this document from Paul Avison, Linda Cottrell, Anthony Cartmell, Des McCarron, Rowena Macaulay, Hilary Reed, R Highwayman, Duncan Dollimore, John Meudell, David Holladay, Roger Hill, James Dawton and others*

*Pictures of Ipswich Road roundabout courtesy of the Daily Gazette*



*"If you want genuine modal shift then somebody who is currently in a vehicle has to want to use a cycle route.*

*"So then the question becomes what would make me want to use it – and overwhelmingly it is 'it must be easy, attractive and safe'. And if it's not those three things, all of them, probably in that order, then I'm not getting out of the car.*

*"I'm not going to get out of any kind of vehicle to do that.*

*"So it has to be those three things, and a big chunk of that is a safe, easy space that is convenient, goes where I want to, uninterrupted, and it puts me first."*

**Chris Boardman to the London Assembly, January 10, 2018**

## Introduction

My name is William Bramhill. I am a member of Cycling UK, the national cyclists' charity, and Colchester Cycling Campaign. [I oppose this scheme](#). I argue that the proposed changes represent the worst aspects of Essex County Council's enduring obsession with the car to the exclusion of the practical application of other forms of transport — you could term it institutional motorism.

In the Sixties, Seventies and Eighties, few people knew better. Motoring was popular, jams were not too bad and we still had space to build roads and tweak urban street layouts.

Today we are building major roads (widening and rerouting the A120 and turning the A12 into a six-lane expressway) without giving full consideration to the effect on towns.

In the meantime unrestricted traffic growth has resulted in huge urban congestion which will not be solved by extra road-building or adding capacity.

The downsides of mass car use are apparent — especially for those who, for various reasons, cannot or do not use a car for every journey. The resulting lack of transport choice affects air quality, the health and fitness of the population (especially children) and quality of life.

Screeds have been written on how we should encourage active travel, promote public health, cut pollution and reduce social isolation. Much of this is set out in government and other official paperwork ... but by and large Essex turns a blind eye. In this respect County Hall is still Toad Hall.

## Executive summary

In this document I explore how ECC omits to give full consideration to key duties, policies and strategies in its plan for the A133 at Harwich Road and Ipswich Road. I show that this results in a scheme with few if any benefits for anyone, whether they [walk](#), [cycle](#) or [drive](#). I argue that the current design [will do little for congestion](#) and nothing to address traffic growth, and it will not mitigate jams caused by too many people making short journeys by car: simply put, it is poor value for money. I also flag up how thousands of people will be stopped from potentially using a cycle (*cf* active travel policies) because this project [reinforces a “barrier”](#) rather than finding a way through it.

Along the way I draw attention to how Essex ignores the primary objectives set by the South East Local Enterprise Partnership, its fundholding partner — and how Selep fails to police the scheme, letting down the taxpayer as it does so.

Essex appears to dispense with [key national and local policies, strategies, guidelines and a legal duty](#) or does not consider them. These include its own Local Transport Plan, key parts of the Design Manual for Roads and Bridges, its own cycling strategy and a proper application of its [duties under the Equality Act 2010](#). If these had been followed, a far different scheme — one much better for the economy, much more durable and people-friendly — would have been brought forward. The design



as proposed fails to address the issues of a rapidly growing town which has a 13,500-population “garden community” planned for a site just 1.3 miles away. It is heavily orientated towards motor traffic and does nothing to encourage greater use of sustainable transport: ECC is painting itself into a corner: it wrings its hands about the cause of traffic jams but then condemns residents new and old to having to drive and join the jams — with no option to travel differently.

Most worrying is ECC’s lackadaisical attitude to air pollution, which results in the early deaths of about 100 people a year in the Colchester area alone. The importance of a robust approach to improving air quality is emphasised by recent headlines, with the government saying “action is vital” and Whitehall investing local authorities with the lead role in addressing the issue. Yet, as [I reveal here](#), ECC has not commissioned any study into the effect on any aspect of public health, including air quality.

[A list of questions is given below.](#)

## What we want

As in my [draft complaint](#), I want ECC to abandon the current scheme. I want it to fully consider all relevant policies and strategies and return with a new design. I urge Selep to play a full and proper part in policing the process before releasing funds.

I also call on ECC to take independent advice — engaging a lawyer who is a specialist in the Equality Act — on whether the scope and extent of ECC’s equality impact assessment (EQIA) processes, as used for this scheme and others, meet the terms of the act and the associated Brown principles. The lawyer’s report should then be made public.

## The scheme

ECC is proposing changes to the junctions of the A133 where it is crossed by the A1232 Ipswich Road and the A137 Harwich Road. This is taking the form of replacing two small roundabouts at each junction with one large roundabout. The south westbound side is already a dual carriageway; the north eastbound carriageway functions as a two-lane road but the work will formalise this, taking space from the shared cycleway and verge. The work is being funded by the Department of Communities and Local Government via the South East Local Enterprise Partnership and its Local Growth Fund.

## History of this complaint

I submitted a draft complaint to ECC on December 1 2016. This was acknowledged and I believed my views were being considered<sup>1</sup>. In October 2017 it became clear that the scheme was about to go ahead. ECC had made no attempt to contact me to discuss the points I raised: the only information I

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<sup>1</sup> From Gavin Jones, Dec 5 2016: “I note that you refer to this as an interim complaint and intend to submit a formal complaint once you have received replies to your FOI requests. Therefore, whilst I shall consider the points you have made I shall delay responding until I am in receipt of your full formal complaint. As you know, you of course have the right to refer your complaint to the Local Government Ombudsman at any time.”

had was received after Freedom of Information requests or following questions that ECC turned into FoI requests. I then found that no changes had been made to the original plan. I again pointed out the problems from a cycling and walking perspective. Minor changes were made in December 2017 (reinstatement of the Cowdray Avenue crossing and wider shared cycle/pedestrian routes — I assume the original width did not meet [DMRB standards](#))<sup>2</sup>. I also highlighted the lack of safe north-south routes and a serious safety flaw on the east-west route at St Andrew's Gardens.

## Setting

Colchester is one of the fastest-growing towns in Britain. The town is notorious for its traffic congestion, despite having two bypasses (1930s and 1980s).

No ECC or other road scheme has reduced traffic or congestion levels for more than five years, very often for far less.

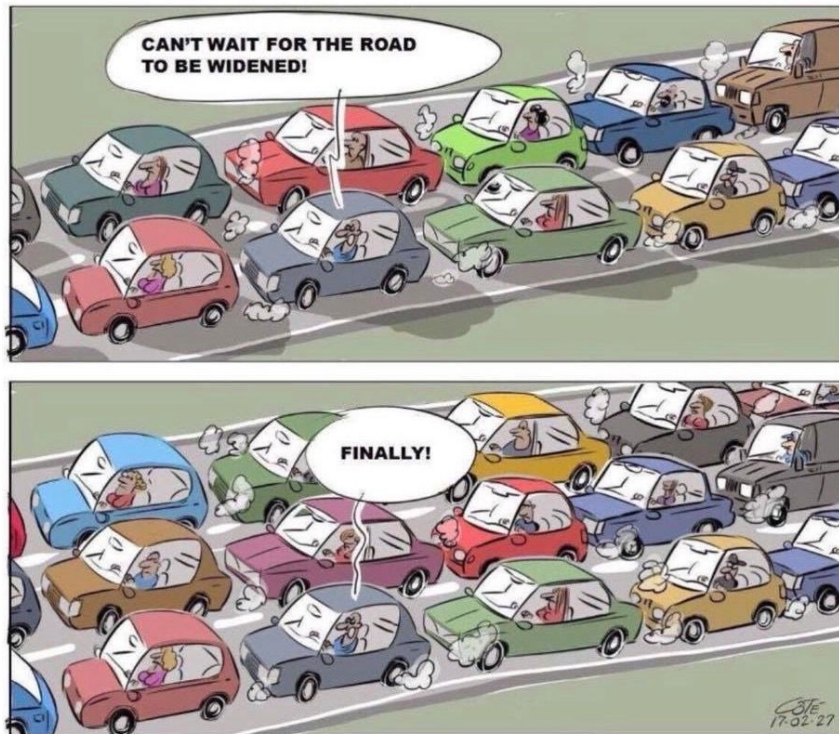
With regard to the intended reduction in traffic/congestion in the medium to long-term, the opposite has proved true: new road space has led to the [growth of motor traffic levels](#) and quickly led to [increased congestion](#) — a phenomenon called [induced demand](#).

There is also a knock-on effect on “unimproved roads” in the locality where bottlenecks are created or become worse.

The town has been named the **second-most car dependent city** in the UK and [ranked lowest for accessibility and planning](#), and it was the [40th most congested town](#) in another recent poll.

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<sup>2</sup> Interim advice note 195/16, cycle traffic and the strategic road network



There is no doubt that new infrastructure is needed but the question is not “How do we want our congestion? Four lanes, six lanes, eight lanes or more?”, but where do we draw the line on increasing road capacity and ensure that cyclists and pedestrians have good provision.

Essex transport policies have failed abysmally. The result affects productivity, the general economy, health, wellbeing and quality of life. Since 2013 ECC has been responsible for public health, which should encompass active travel and air quality, but Essex Highways appears to ignore that.

ECC’s enduring emphasis on motor vehicles has damaged the attractiveness and effectiveness of cycling and walking: cars have squeezed cyclists off the carriageway and little has been provided by way of an alternative; cycle-specific infrastructure is disjointed or incomplete, badly designed or of poor quality. Pedestrians, meanwhile, suffer a poor environment next to busy roads. The result is that more people drive even for the shortest journeys<sup>3</sup> (40% of short journeys by car are under two miles). This applies especially at peak times, and has increased traffic hugely.

By ploughing on with its discredited pro-car policies, ECC is showing how unwilling it is to improve matters. In doing so ECC ignores various policies, including its own. See [this section](#) towards the end of this document.

The short piece of road covered by this scheme is a key link for all modes of transport. It is positioned between Greenstead (pop 10,000) and the University of Essex (11,500 students, 2,000 staff) in the east, and the main line railway station, town centre and general hospital in the west, all within a 2.5-mile radius.

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<sup>3</sup> Of short journeys made by car, 11% are under a mile, 29% are under two miles and the remaining 60% between two and five miles. CCC follows the Sustrans example of defining a short journey as being under five miles, an easily cycleable distance. See [Short Journeys. Big Savings.](#)

Remodelling the A133 at Ipswich Road and Harwich Road should have given ECC a chance to show that it is committed to promoting alternative transport, especially in view of plans for the [Salary Brook garden community](#) (pop 13,500), one of three sustainable new towns planned for north Essex.

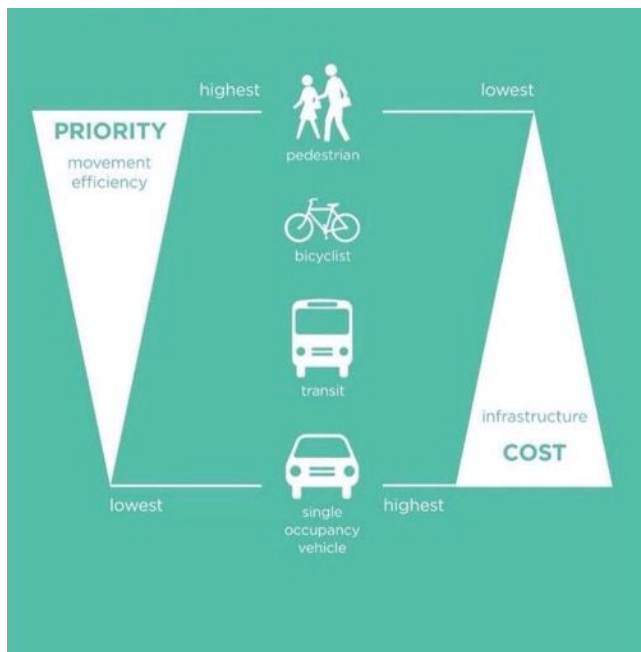
Martin Goss, chairman of Colchester Council's local plan committee, says: "It is vital that people in the new garden communities have access to well planned infrastructure for all forms of transport whether it is bus, train, cycling and walking along with motor vehicles.

"Having a balanced approach for reasons of active travel, public health and to stop town traffic locking will work providing the infrastructure is well planned and deliverable. First-rate cycling and walking infrastructure is also vital to offer choice. Providing collective infrastructure is delivered it will be a real success."

## ECC's record

Essex Highways has been reprimanded (March 10 2017) for its poor performance. See [this report](#) from the Local Government Ombudsman. The ombudsman ruled that Essex was guilty of

maladministration causing injustice. He noted "ECC/Selep did not consider cheaper yet more effective options" — and I believe that this criticism applies in this case too.



In addition, shared-use cycle routes installed as part of recent schemes at North Station and Colne Bank Avenue are next to useless: they are indirect, do not meet cycling's "design speed", are crowded with pedestrians, have frequent obstructions and require cyclists to give way to traffic at uncontrolled junctions.

In a letter in December 2017, Jake Berry, MP for local growth, said the onus was on ECC to explore options before applying for funding to Selep.

## Selep's record

The [National Audit Office](#) has been critical of how LEPs are funded with regard to local transport and how that spending is decided and money passed on. I witnessed this first-hand because CCC was in the position of being able to compare Selep schemes with the funding timetable of the £4.2m Colchester cycling town project in 2008-12, which was backed by the Department for Transport and optimised to suit a transport scheme. I am also concerned about the apparent lack of policing by Selep



to ensure this project meets its aim of being “an integrated package of improvements” and complies with The Essex Local Transport Plan and other policies. I have been assured that Selep revised its procedures<sup>4</sup> following my Mile End Road complaint but its work related to this junction casts doubt on that.

## Cycling specifics

The scheme does not improve matters for cyclists.

East-west: The scheme retains the 1980s-built east-west shared-use cycle path with toucan crossings of Harwich Road north and Ipswich Road north. This has been widened as a result of consultation but there are two safety flaws: a) the path across the St Andrew’s Gardens junction is dangerous in that there is limited warning to cyclists of vehicles turning left (previously a slip road made it clear which cars were making this manoeuvre, giving more warning of drivers turning left or drivers that had left their indicators on), and b) the width of the path on the western side of the crossing at Ipswich Road south goes down to 3m on a 90-degree turn at a point where pedestrians will wait to cross the road. The current design still includes shared paths, rather than a dedicated cycleway, which would be needed to attract cyclists<sup>5</sup>. The route as it stands has not been improved. As such it is most unlikely to draw people to cycle instead of drive.

North-south: ECC has made no attempt to address north-south cycle movements at either of the two roundabouts (see [Social Cohesion](#), below). At present and at any time in the past 40 years, a brave, road-trained cyclist may attempt to cross either junction; they would be assisted by the fact that motor traffic speed is reduced to a minimum, as it should be at points of conflict. UK roundabouts *per se* are most dangerous for cyclists<sup>6</sup>. The new roundabouts have been designed to be fast-exit, fast-entry, with the Ipswich Road roundabout having two fast straights and three circulatory lanes: for cyclists this is hostile, daunting and probably lethal to try. This comes at a time when policing and the law [fail cyclists with regard to road justice](#).

There are two important points to note:

- There are no realistic alternatives for people who want to cycle from, say, St Andrew’s estate to work at Moorside Business Centre or Whitehall Road without a long detour (see section on [social cohesion](#), below)
- The land grab caused by the new design places constraints on future options, ie, if ECC eventually wanted to put in good cycling provision, it would be impossible without compulsorily purchasing land or taking space from motor traffic. Put bluntly, this is the last chance ECC has to make these junctions fit for a programme of active travel and sustainable transport.

## Walking specifics

The scheme does not improve matters for the majority of pedestrians.

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<sup>4</sup> Letter from Jake Berry MP to William Bramhill Ref 3535654, December 2017

<sup>5</sup> <http://www.icevirtuallibrary.com/doi/pdf/10.1680/jensu.15.00001>

<sup>6</sup> Cyclists represent 2% of roundabout traffic but 8% of casualties (source: DMRB)

Until CCC intervened, ECC was set on removing the pedestrian crossing on Cowdray Avenue. This has been reinstated.

According to ECC<sup>7</sup>, the crossings are being “upgraded” to puffins (the type with nearside green lights).

Neutral effect: the pedestrian safety records of both types of crossing are nearly identical so there is no upgrade in this respect.

Negative effect: At present, pedestrians enjoy the convenience of zebra crossings at several arms of these junctions with only a small journey diversion required. A minimal wait is encountered, which is important in terms of continuity, efficiency of journeys and attractiveness. This applies especially in bad weather: standing next to heavy, fast-moving traffic while waiting for a green light is unpleasant. Unfortunately ECC uses the timings of light-controlled crossings to increase the through-flow to the advantage of drivers/motor traffic and the disadvantage of pedestrians/active travel; the lights’ timings are vastly in drivers’ favour and pedestrians can wait 30 seconds (or, we believe, more) for a green light. [The LTN 2/95 Design of Pedestrian Crossings](#) says that maximum waits should normally be set between 10 and 30 seconds. The note says: “Only in exceptional circumstances should a value greater than 30 seconds be used.”

The result is that active travel is less viable and less attractive (the Brook Street and East Bay “improvements” are an example of this — at the signals, many pedestrians become impatient and dodge into the traffic; the lights on the Route 51 cycle crossing used to change immediately on demand).

Beneficial effect: the single benefit for walkers applies to the visually impaired, who are more confident that it is safe to cross.

Note that the switch to puffin crossings at the Albert roundabout<sup>8</sup> in 2009 led to no statistically significant improvement in journey times — making this expensive scheme largely pointless; also the measurement of “total user time benefit” related only to motorists, not pedestrians. This scheme will make pedestrian crossings of the roads at the junction substantially longer.

One option would be — and we would urge a study into this — that the lights change after ten seconds but then do not change again for a set period, to allow traffic through. We believe this would have minimal effect on drivers but would maintain the attractiveness of walking journeys.

## Driving specifics

The scheme is likely to bring very little improvement, if any, for motorists.

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<sup>7</sup> Email from Kevin Bentley, Dec 13, 2017

<sup>8</sup> ACM report, Mouchel, Albert RAB before and after, Jan 2010

I am an active cyclist but like 90% of adult riders I also drive. The current double roundabouts are excellent at maintaining traffic flow — except at peak times when they hit capacity. In the event of an incident, for instance, a breakdown or shunt, only half of the junction is blocked and the other half is still likely to flow, at least for a time. This is vital on a busy road which is home to the main fire station in the north of the county.

Our fear is that with one single roundabout at each junction a simple shunt or breakdown will be enough to rapidly bring all four feeder roads to a standstill, even given the three circulating lanes at the Ipswich Road roundabout.

In the 1960s, and before the second bypass was built, this site featured two single roundabouts — very similar to the current proposal.

In the early 1970s these junctions and the Albert roundabout (the junction of the A133 and the former A134 Sudbury road) were subject to experiments with white-painted tyres overseen by roundabouts pioneer Frank Blackmore<sup>9</sup>, formerly of Colchester. His opinion was that the double roundabouts worked far better than a single roundabout — the tyres went and the arrangements were made permanent.

Blackmore's view is backed up in the [DMRB guidance on roundabouts](#), which says (Vol 6 Sect 2, Chapter 3, 3:2) *“If a normal roundabout has more than four arms, it becomes large with the probability that higher circulatory speeds will result. Either a double roundabout or a signalised roundabout is a potential solution in these circumstances.”*

While both our roundabouts have four arms rather than five or more, the design for the Ipswich Road roundabout, in particular, clearly allows fast circulatory speeds which will have the same effect spoken about by Blackmore.

At 3.12, DMRB says: *“[Double roundabouts] can be particularly useful at overloaded single roundabouts where, by reducing the circulating flow past critical entries, they increase capacity.”*



## Capacity issues and value for money

Whether or not the works at Ipswich Road/Harwich Road increase capacity and how much that is influenced by traffic growth directly affects both the perceived and actual value for money.

<sup>9</sup> <http://www.mini-roundabout.com/tribute.htm>

I anticipate a return to jams far sooner than ECC expects, and there will then be no chance (or space) to put in quality cycling infrastructure, which could help relieve congestion by offering an alternative mode of transport for journeys of up to five miles.

I contend that ECC should be looking at managing motor traffic rather than trying to cater for even more of it. It is particularly unimaginative in this respect. Note that traffic jams can be interpreted [as the sign of a healthy economy](#).

We have queried traffic capacity with ECC, which says (FoI ECC1137204 10 16) that the new roundabouts have a “design year” of 2033 (just 15 years) — presumably at that time ECC expects they will be at capacity. ECC says traffic will have risen by 20.3% on the 2016 figure by that time. However, a [news story](#) on plans for the nearby St Botolph’s roundabout quotes ECC as saying that traffic there is expected to rise by 40% in the period 2007-32, even though most development in that part of town is largely complete. [National estimates](#) (2015) put the rise by 2040 at up to 55%.

There are also two major road schemes set to go ahead — the rerouting of the A120 from Braintree to Marks Tey or Kelvedon, and the conversion of the A12 from Hatfield Peverel to Ardleigh into a six-lane “expressway”. Based on experience, such massive roadbuilding (the like of which north-east Essex hasn’t seen since the 1980s) will probably result in a huge increase in urban traffic (most car/lorry journeys start and finish in towns).

ECC says (FoI ECC1137204 10 16) that its traffic forecasts are based on the Department for Transport Tempro Suite 7.0. In a [note on the use of Tempro](#), Defra says: “It is important to note that Tempro should not be used on its own to provide growth projections. It should always be combined with national or regional forecasts.” The Essex FoI response says only that the “traffic estimates were worked out using Tempro”.

CCC engaged a professional data analyst to use Tempro to try to replicate ECC’s result. She says: “I have been unable to exactly duplicate the results provided by ECC. It appears that they have included some assumptions for which I do not have information. There are, however, a few things to note about what they do provide:

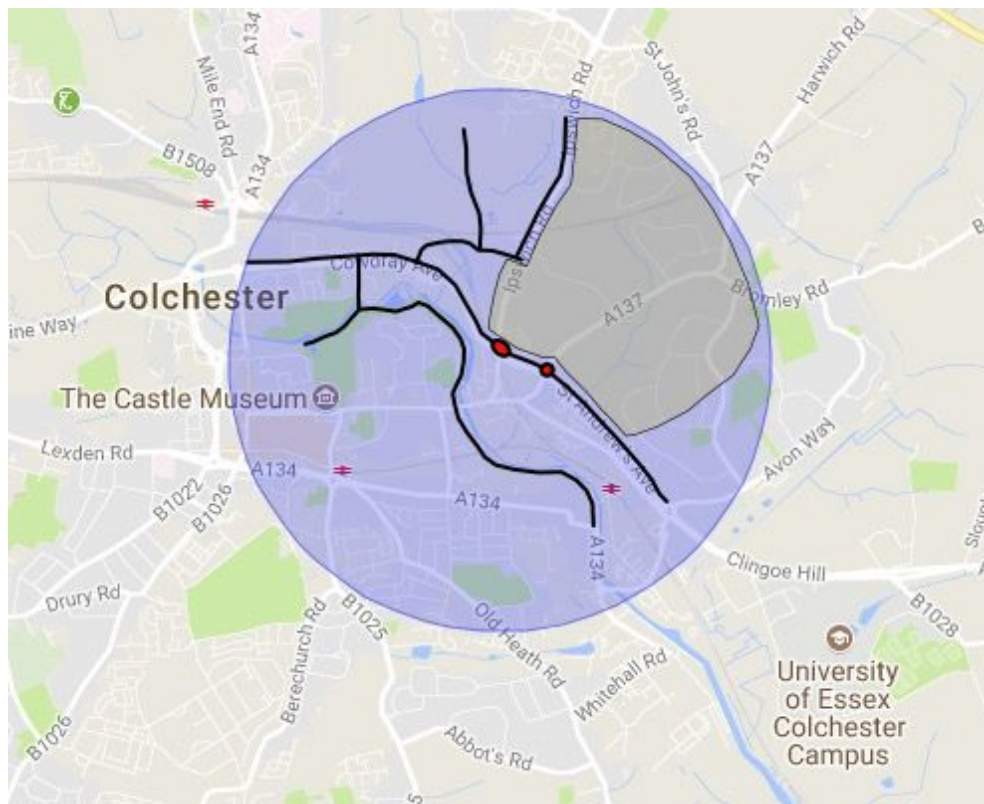
- “Not all of the traffic-count points ECC provides as relevant [in the FoI response] have data for 2016 (the indicated base year). Two points — 27926 and 56294 — are [no longer included on the map](#) and do not have data (count or estimate) since 2014.
- “Traffic counting point 56294 is supposed to be on the A1232, between the A133 and A137. The current map shows two traffic counting points on the A1232, 37621 and 27585.
- “The RTF calculator appears to go up to only 2025, but even if I use that, and make quite optimistic assumptions, the traffic growth I calculate is a 4.5% increase 2016-18, and 27.7% to 2033.
- “I get numbers closer to theirs if I consider only off-peak traffic. It is, however, possible that they were using different, but still valid assumptions, than those used in the Tempro guidance.
- “Finally, I do not believe that the traffic estimates provided by ECC include increased volumes for the A120 and A12 projects, or new homes to be built in the area.”

We understand that other ECC/Selep “anti-congestion” schemes, notably the signalisation of the Brook Street/East Hill junction and the relocation of a puffin crossing on the Avenue of Remembrance (carried out as a standalone scheme) have failed in their primary aim of reducing congestion. These projects have cost the taxpayer hundreds of thousands of pounds and are currently subject to FoI requests to discover whether money is being wasted.

There seem to be disparities between ECC’s figures for predicted traffic growth. I query whether ECC has taken all factors into account. I would also be interested to know if Selep has used its “procedures for assurance” to check Essex’s figures, or considered asking for peer review by an expert third-party.

## Social cohesion and sustainable transport

The new layout is adequate for pedestrians but fails to encourage people to travel by cycle and so adds to dependence on the private car. It does this by both not attracting new east-west cyclists and completing the north-south “barrier” created by the road. This increases social isolation for those without access to a car who live to the north and northeast of the junctions.



This map shows the roundabouts in red with key cycle routes in black. The blue circle denotes a one-mile radius from the junctions.

The area tinted beige (Area 1) includes homes in the southern end of Ipswich Road north, St Andrew’s Gardens, St Anne’s estate (Goring Road and related streets), St John’s estate and part of Greenstead estate, the Colchester Academy, and Friars Grove and Willowbrook primary schools. The area to the south of St Andrew’s Avenue (Area 2) includes industrial and office areas at Moorside,



Oyster Park, and Whitehall Road, St James's primary school, leisure facilities at Rollerworld and Quasar, and a variety of small specialist shops in East Street.

Similarly there are some homes in Area 2 (Greenstead Road, East Street) whose occupants may wish to travel north to the Gilbert secondary school, Colchester business park and Severalls industrial estate (just off the map but about two miles north of the junction).

One of the aims of the Colchester Cycling Town scheme was to “beat the barriers” formed by roads, railways and rivers. This appears to have been forgotten in the case of this project — the “barrier” is being reinforced.

We contend that people who cycle in these areas will be disadvantaged because of ECC's failure to include proper cycle provision.

Councillors and council officers appear to have followed gut feeling rather than making a proper and full assessment of data and setting the scheme against the full range of national and local policies and strategies.

The rules put in place in LTP3 and other policies are precisely for this kind of difficult situation, not to be discarded on a whim.

## **The ECC pipeline**

Various schemes that are now going ahead were developed some years ago. At some stage ECC has fully or partly developed projects but funding has dried up. It has then tucked its drawings into a bottom drawer in case money became available.

Schemes that have been developed recently with Selep cash have included new bridges across Balkerne Hill and the River Colne near Castle Park, which CCC supported as part of Colchester Cycling Town. One we don't remember being part of that tranche was Mile End Road — but it was clearly on ECC's radar.

I believe the Ipswich Road scheme is one of these “pipeline” schemes. ECC made sure to acquire land when Waitrose in Colchester was developed in 2008-9. The design brief of 2012 (connected with the Waitrose s106) called for “a range of possible junction upgrade schemes to be considered ... including a review of past proposals ... [from] 2002-3. I suspect the design brought forward is one of those that dates back to 2002-3 and that the primary ethos has not been modified in light of changing transport priorities, hence its failure to include “an integrated package of transport improvements”.

The scheme should have gone back to the drawing board. As it is, the council has wasted money in bringing forward a plan that is not fit for purpose.

Note that the Design Manual for Roads and Bridges ([Vol 6 Sect 2 Par 1.5](#), Design of Major Interchanges, Aug 2007) says: “Choice of location will often be severely restricted, compared with completely new construction. Layout options may also be restricted by adjacent development and

other constraints. Management of traffic on existing roads will often play a significant part in the assessment of options and the planning of construction.”

While I agree that land at these junctions is restricted, this scheme has been in preparation in one way or another for ten years and probably more. There has been plenty of time to improve the design, to acquire more land, help non-motorised users and to ensure the design meets LTP3 policies, etc.

## Air quality

Various national and local policies ([see below](#)) refer to the importance of improving air quality. Selep’s business case (BCES 1:1) emphasises the need “to reduce carbon emissions and improve air quality within an identified air quality management area (AQMA)”.

Essex Air, of which ECC is a member, says there is an increasing number of AQMAs owing to “increased traffic growth and congestion<sup>10</sup>. Note that it blames both growth and congestion.

The nearest AQMA is at the Harwich Road/St Andrew’s Avenue junction which forms part of the scheme. A second is at Ipswich Road South and East Street, barely 100m to the south of the Ipswich Road junction. All traffic passing through this area will use either the Harwich Road or Ipswich Road roundabouts. The nearest full monitoring station is Brook Street, 600m from the junction.

I am concerned that the planned-for traffic growth will worsen air quality. If the new design should reduce congestion, which I doubt, induced demand will mean a rapid return to jams. This will have a knock-on effect on air quality (especially East Bay and Brook Street).



**John Whitelegg**  
@John\_Whitelegg

Following

Air pollution is a huge failure of UK public policy..why do we not have the 100+ low emission zones that Germany has?

[#AirPollution](#) [#mobility](#)

**Living Streets** @livingstreets

70% of air pollution is produced by road traffic. We need to fight back with more walking & cycling. #ActiveTravel = cleaner air #walkingcities #fightingforair livingstreets.org.uk/what-we-do/key...

8:08 AM - 11 Jan 2018

[John Whitelegg](#) (tweet above) is Professor of Sustainable Development at York University's Stockholm Environment Institute.

<sup>10</sup> <http://www.essexair.org.uk/AboutEssexAir/Default.aspx>

There can be no doubt of the dangers that the changes to the A133 pose to residents and those travelling through Ipswich Road south, Harwich Road, East Street and Brook Street. The government in its [latest document](#)<sup>11</sup> notes: “*Short-term exposure to high levels of air pollution can cause a range of adverse health effects including exacerbation of asthma, effects on lung function, increases in hospital admissions and mortality. A review by the World Health Organisation concludes that long-term exposure to air pollution reduces life expectancy by increasing deaths from lung, heart and circulatory conditions. There is emerging evidence from the Royal College of Physicians (among others) of possible links with a range of other adverse health effects including diabetes, cognitive decline and dementia, and [effects on the unborn child](#).*”

The same paper stresses that the government is [giving local authorities](#) the leading role in tackling air pollution.

It goes on to say: “It is [vital that action is taken](#) in the [shortest time possible](#) to improve air quality in those areas where air pollution is above legal limits.”

CCC made an FoI request for data on “the effect of greater traffic capacity on public health (including but not limited to air quality)”. ECC’s response (ECC3295713 10 17 of November 9 2017) makes clear that ECC has not commissioned [any study](#) into the short, medium or long-term effect [on any aspect of public health, including air quality](#). It promises a scoping study into air quality at some stage, but this will probably be too late to influence the design of the scheme.

Given that ECC says it has used Tempro estimates, above, I am amazed that no air quality estimates have been based on this using Defra’s [LAQM pages](#) (tied in with Tempro).

Note that residents of Brook Street, one of the streets most affected by poor air quality are in favour of [filtering](#) to reduce traffic there — this could have formed part of an alternative scheme.

I argue that the issue of [air quality is fundamental as to whether the scheme should go ahead](#). ECC should have considered it at a far earlier stage.

## **Equality Act**

I believe ECC has failed in its duties under the Equality Act 2010. This is presented in [more detail below](#).

## **Policies, strategies and legal duties that Essex has ignored, omitted or dismissed**

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<sup>11</sup> UK plan for tackling roadside nitrogen dioxide concentrations, Defra and DfT, July 2017

### Local Transport Plan 3

<http://www.essexhighways.org/highway-schemes-and-developments/Local-Transport-Plan.aspx>

ECC's statutory umbrella transportation strategy is its third Local Transport Plan (LTP3), adopted formally in July 2011 and intended to last until 2025.

*My comments are in italics. The underscores are mine.*

On carbon reduction, LTP3 says (page vi, para 2): We will aim to reduce these impacts by reducing the carbon intensity of travel in Essex, reducing pollution from transport to improve air quality in urban areas and along key corridors, and protecting and enhancing the natural, historic and built environment. We will build on our recent success in encouraging sustainable travel for daily trips, particularly for the journey to work and school, enable greater travel choice, and support initiatives to make car travel more sustainable.

*Essex appears to have ignored LTP3 in this instance. As explained above (Social Cohesion), this scheme reinforces the north-south barrier for cyclists and does not improve the east-west route. The type of crossing also affects attractiveness for pedestrians. The scheme does not offer greater travel choice — in fact it reduces it.*

On access and travel choice, LTP3 says (page viii, par 4): “If the council is to achieve its vision of sustainable growth, it needs to broaden travel choices and promote the take-up of available sustainable travel options; for instance by encouraging the 30% of Essex residents who travel less than three miles to work to do so by bike, or by encouraging those travelling less than a mile to walk.”

On transport priorities (page x), LTP3 lists as a priority: Improving and promoting cycle networks, and improving the availability of travel choices and awareness of them.

*Essex appears to have ignored LTP3 in this instance.*

On ECC's role in transport delivery (p14, para 1.1.1) LTP3 says the county has a duty to “manage the network to enable traffic, including cyclists and pedestrians, to flow freely by making sure roads are used efficiently and with reduced congestion”.

*Essex has taken a one-sided view of LTP3 in this instance.*

Setting out our vision for transport (p2 Para 2.2 ) sets out as one of three broad approaches: “A focus on carbon reduction — with priority given to improving travel choices and encouraging less car use.”

*Essex has omitted any serious consideration of air quality as it developed this scheme.*

On challenges and approach LTP3 (p52 para 4), ECC says: “Reducing congestion in order to improve connectivity within our towns ... and increasing the proportion of trips to and within our urban areas which are made by public transport, on foot or by bicycle.”

*Essex appears to have ignored LTP3 in this instance.*

It adds (p54) under “Improving connectivity for pedestrians and cyclists”: “Encouraging people to consider walking or cycling is important to reducing traffic congestion, as well as improving health and reducing emissions of CO2.”

*Essex appears to have ignored LTP3 in this instance.*

LTP3 also says in policy 8 (p70-71) “ECC will encourage the use of more sustainable forms of travel by consistently supporting and promoting sustainable travel and providing infrastructure for sustainable transport ... including addressing gaps in existing networks, consistently supporting and promoting sustainable travel, providing infrastructure for sustainable transport ... and improving crossing facilities.”

*Essex appears to have ignored LTP3 in this instance.*

It adds (p179 policy 14) “Cycling will be promoted as a way to reduce congestion within urban areas, to encourage healthier lifestyles.”

*Essex appears to have ignored LTP3 in this instance.*

On healthier lifestyles (p115), LTP3 mentions improving cycle networks and says: “Completing missing links in existing cycle networks, providing better signing and improving cyclist facilities (for instance crossings and cycle priority measures) to provide continuous and safe routes linking urban and surrounding areas

*Essex appears to have ignored LTP3 in this instance.*

On priorities for the Haven Gateway (the haven ports and their hinterland, which included Colchester; the Haven Gateway Partnership is involved with Selep), LTP3 mentions (p125) “the need to accommodate housing and employment growth in a sustainable way, and improving and promoting cycling networks.”

*ECC appears to have failed to adequately consider this in this instance.*

LTP3 also talks about examining the role of innovation and technology in reducing carbon emissions: “The authority will also need to examine the role innovation and technology can play in reducing carbon emissions and pollutant levels such as the widespread introduction of electric vehicles and alternative fuels.”

*That was written in 2010 but it is still too early to consider the improvements that may be brought by electric vehicles in respect of this particular scheme. The government has said diesel and petrol cars will be available until 2040, meaning they will be on the road possibly until 2060. The Defra/DfT paper of 2017 notes: “[Change] will not happen quickly enough and the impact that air pollution continues to have on the health of this nation means we must do more, sooner.”*



*Commentary: ECC is planning to revamp its cycling offering but I understand that this involves "quick wins" in areas where cycle use is minimal and car use unaffected. In light of the lack of improvements and permeability with the A133 scheme, I see this as ECC ducking the important issue of installing effective infrastructure for utility cycling. Documents such as LTP3 are intended to direct and guide councillors and officers, and should not be ignored.*

*The county continues to pursue its 60-year-old line of trying to tackle congestion by increasing road space rather than implementing the policies and measures it identified in LTP3. It has a variety of options ([such as filtering, shown in this video](#) and [here](#)), catering properly for the alternatives or pressing for effective government measures such as [road charging](#). Until recently, Rodney Bass, then highways portfolio holder, refused to countenance congestion charging; note the positive effect seen on all aspects of life, including business and the economy, in [Stockholm](#).*

### **Design brief**

The design brief for this junction was published by ECC in October 2012 following the allotment of s106 money from the Waitrose development.. It called for “suitable pedestrian and cycling facilities to be incorporated into the designs”. It also said the process “should engage the AQMA team in Colchester” with regard to air quality.

*Commentary: I find it hard to see how ECC seems to have ignored both north-south cycle routes and a full air quality study in the final scheme.*

### **Selep Business Case Executive Summary**

[http://www.southeastlep.com/images/uploads/resources/LGFSE26\\_Colchester\\_ITP\\_Business\\_Case\\_.pdf](http://www.southeastlep.com/images/uploads/resources/LGFSE26_Colchester_ITP_Business_Case_.pdf)

*(Note: In the past few days I have learnt that the financial arrangements between ECC and Selep make Selep liable to respond to FoI requests. After the Mile End Road affair, I did not bother to write to Selep, hence the absence of a Selep response.)*

I made an FoI request to ECC to request a cost-benefit analysis for the new junction. The response pointed me to Selep’s business case executive summary (BCES).

This states that because of development placing strain on the existing transport network, an integrated transport approach is needed to address the town’s needs.

It goes on to give, as a primary objective: “[The package] will deliver a range of initiatives to encourage and improve access for all modes.”

*The Ipswich Road/Harwich Road junctions are far from an integrated transport approach. Selep should have picked this up. It has either been slack in exercising its “procedures for assurance” or it has been misled by ECC.*

The BCES map at 1:1 shows a route from St John's/Greenstead towards the town centre as "a key transport corridor"

*Yet north-south cyclists are ignored*

Another primary objective is "to reduce carbon emissions and to improve air quality within an identified AQMA".

*This has been ignored by ECC. Given Selep's staffing and function as outlined by government, the onus was on ECC to ensure this was carried out — but Selep should have been on the ball.*

The BCES says the package "will also help to reduce traffic in the town centre as this is an alternative to the main congested route".

*Selep is ignoring 70 years of transport experience. Beyond a 1:1 car replacement, which would be naive, dualling the Avenue of Remembrance will have the effect of encouraging an increase in overall traffic. Without traffic restraint, this increase will encompass the town centre.*

At 1:3, the BCES states: "Any improvements to this corridor will inevitably also have a positive effect on the town centre and on all north-south movements across this route."

*This is, again, naive. Induced demand is a well-recognised phenomenon. At the very least it should have been taken into consideration.*

The BCES lists the outcomes that ECC wants to achieve, including "that children get the best start in life", "people in Essex enjoy good health and wellbeing". "People live in safe communities and are protected from harm", "people experience a high quality and sustainable environment", "people can live independently and exercise control over their lives/"

*The work being done at Ipswich Road/Harwich Road contravenes nearly all of these points. It does not encourage school journeys (except by car), it does not encourage children's independence, it does not aid health or wellbeing. In terms of air quality it contributes to harm, there is little sustainable about the scheme, and people will only be able to "exercise control over their lives" if they have access to a car.*

The BCES is keen on "encouraging business".

*This is a good policy, which Selep stresses time and again in this document. Good business, however, does not preclude providing for active travel and sustainable transport or increasing traffic levels. If Selep were more robust in ensuring its aims were met, we could be seeing [business parks planned for the future](#).*

At 1:4, the BCES quotes LTP3 and says "doing nothing" is not an option.

*We agree that doing nothing is not an option, but Selep/ECC must ensure they work within policies and strategies affecting all forms of transport. They should also look at the experience of other countries which, in terms of their approach to traffic and street design, are leaving the UK in the dark ages.*

In its Swot analysis the BCES highlights “disconnected sustainable transport links — lack of connected cycleways”

*... yet nothing is being done to improve matters at Ipswich Road/Harwich Road. As for “cycleways”, Colchester has none — cycleways are dedicated cycle routes, such as the east-west cycleway from the Tower of London to Parliament; this is precisely what CCC is seeking.*

At 5.4.3, the BCES provides a table of impacts and whether these are beneficial. It says “slight beneficial” next to air quality.

*I would be interested to see how all these impacts were decided. The pro forma paper says “where appropriate, supported by evidence”. Without supporting evidence, they could have been decided on the officers’ toss of a coin on a drizzly Friday afternoon.*

*No evidence is given. I would be keen to see how these were worked out and which data were used. Most of the beneficial/adverse decisions seem to depend on having access to a motor vehicle, ignoring council policies on active travel and sustainable transport. How was the air quality decision arrived at, for instance?*

In the table on project management, point 9 refers to ensuring compliance with regard to the environment, ie, air quality

*What has gone wrong?*

### **Design Manual for Roads and Bridges**

An FoI statement by ECC says that this junction has been designed in accordance with the [Design Manual for Roads and Bridges](#) (TD 39/94).

Consequently the three papers with relevance here are:

[DMRB Geometric Design of Roundabouts](#) (Aug 2007)

[DMRB: The Design of Major Interchanges](#) (April 1994)

[DMRB Cycle Traffic and the Strategic Road Network](#) (2016)

Please refer to Driving Specifics and Capacity Issues, above, where I point out various problems with regard to the DMRB and the roundabouts’ design in terms of capacity.

#### **• Geometric Design of Roundabouts**

With regard to safety, in [Geometric Design of Roundabouts](#), Par 1.6 of the general principles refers to the level of non-motorised demand.

*While ECC has carried out a survey of existing cycling and walking journeys, to the best of my knowledge it has not tried to assess the level of potential use by cyclists if first-rate provision were provided and the impact this would/could have on reducing congestion. An origin and destination survey at the site would have helped judge the lengths of drivers' trips and the potential for moving journeys from the car to cycling/walking. Another option to assess optimum use would be a [spatial syntax analysis](#).*

Par 1.8a warns the casual reader that there is now a greater emphasis on non-motorised users

Par 1.13 says “The principal objective of roundabout design is to minimise delay for vehicles whilst maintaining the safe passage of all road users through the junction.”; par 2.1 highlights that just because roundabouts are relatively safe, this will not necessarily be the case for all road users. In fact, 2.7 points out that on a typical roundabout cyclists account for 2% of traffic flow yet 8% of incidents. 2.10 refers to TRL Report LR1120 Accidents at Four-Arm Roundabouts, which describes how various aspects of design interact to influence ... accidents. “These relationships therefore constitute the fundamentals of design for safety. The accident prediction models given in LR1120 can be used to compare the safety characteristics of alternative designs.”

*Any cyclist attempting a north-south passage across the Ipswich Road junction would not be guaranteed “safe passage”. ECC must have realised this when planning its design.*

Par 3.2 points to the undesirability (for safety reasons) of higher circulatory speeds on large roundabouts. It says a double roundabout or signalised roundabout can be a solution.

*The fast-entry and fast-exit design combined with the long straights of the Ipswich Road roundabout maximise speed. I am aware that a signalised roundabout has been considered. Given the lack of dedicated north-south cycle access, retaining a modified double roundabout may be the best option. Has this been considered?*

Par 5.16 lists options for dealing with cyclists at roundabouts. This includes the possibility of taking cyclists “away from the roundabout altogether”.

*It does not say anything about social dislocation, however, and other policies should have come into play in the decision. Excluding north-south cyclists merely because it is difficult is unacceptable.*

#### • Cycle Traffic and the Strategic Road Network

Designing Networks for Cycle Traffic says (2.1.1): “Cycle networks shall also allow for trips crossing the SRN corridor. Cross-corridor schemes ... can reduce or eliminate severance which may have otherwise suppressed demand for cycle traffic.”

*Essex claims to have consulted the DMRB with regard to this scheme yet here the manual stresses the importance of cross-corridor schemes, which ECC has refused to contemplate.*

It says in Demand Assessment and Appraisal (2.1.2): “Infrastructure shall provide sufficient capacity to accommodate growth in volumes of cycle traffic.” It points to guidance from the DfT and CIHT. The section goes on to say: “Current levels of demand for cycle trips are not always a good indication of potential future levels of demand. Creation of a comprehensive network of good quality cycle routes has the potential to stimulate demand beyond the incremental change that demand models predict.”

*Here the manual stresses the importance of catering for growth in cycling levels and the importance of a quality network to further stimulate demand. Essex appears not to have read this.*

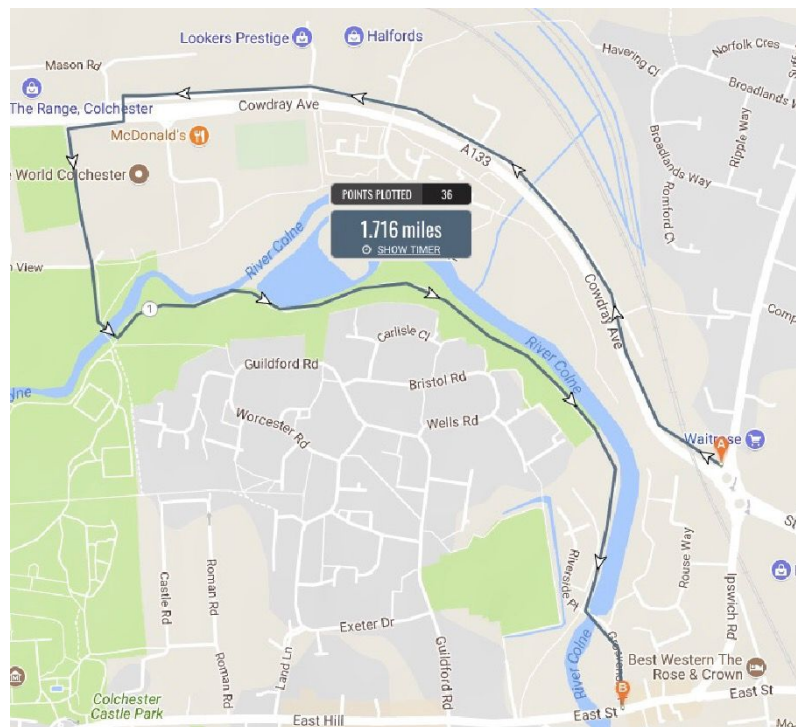


Figure 2.1.2 shows a similar situation to the Ipswich Road/Harwich Road project, highlighting how a 4-minute cycle journey is preferred to an 8-minute cycle journey. At 2.4.1 the note touches on the need for cyclists avoiding junctions that are too busy. It mentions the provision of “alternative routes to enable cycle traffic to avoid junctions, although such routes shall not add significant additional delay or distance, otherwise cyclists may not use them.”

*Cyclists face a diversion of 1.7 miles because ECC has not catered for cyclists at the Ipswich Road roundabout.*

At 2.1.3 the note says: “Stakeholders shall be consulted at all appropriate stages, and early engagement will be beneficial in scheme development.” It goes on to stress: “Highways England and designers shall work closely with local authorities while developing cycle networks, in order to provide route connectivity and take account of local cycle strategies, rights of way improvement plans, local transport plans, and development plans.”



*CCC used to be consulted by means of a regular cycling forum that had run for 18 years. ECC stopped holding the meetings in 2015. As seen here it has taken scant account of policies, strategies, etc. We are working with an ECC officer to set up a strategy forum, but this is a very different type of event to the previous forums.*

Para 2.2.1 says "...cycle traffic shall be separated where appropriate from other users of the highway." [ie motor vehicles and pedestrians] and "The most efficient use of cyclist effort shall be a key consideration in the design of any cycling provision." The sentence on attractiveness points to the importance of integration with surrounding areas. It adds that designers should use the audit process described in HD 42/05 Non-Motorised User Audits [10] to outline options for cycle traffic at the start of a scheme. At 2.2.3 the note says: "As with any transport system, the design speed determines all of the relevant geometry ... cycle traffic shall be separated from pedestrian and equestrian traffic in order to allow cyclists to travel at the design speed." This para sets a maximum design speed of 30kmh and a minimum of 20kmh.

*Essex has used DMRB but did it complete an HD 42/05 Non-Motorised User Audit? Has it considered design speed before specifying a shared use path? Why has it not addressed the St Andrew's Gardens crossing? Why is there a 3m pinch-point on the western side of Ipswich Road (land acquisition could have sorted this and, as shown in "Pipeline", the county have had years to address the issue.*

Para 2.3.3 deals with regard horizontal separation between the cycle path and the carriageway to protect cyclists from the draught created by passing motor traffic and from debris. The minimum width of the horizontal separation between the carriageway and the closest edge of the riding surface of a cycle track, shall be determined using the values in [table].

*No horizontal separation is allowed for in the current scheme. The DMRB specifies a minimum of 0.5m in a 40mph area. Only in a 30mph area is no verge allowed.*

With regard to the crossing of St Andrew's Gardens, the DMRB permits "clearly marked priority for cycle traffic where appropriate, particularly where it crosses side-roads". See also 2.4.3 on priority cycle crossings. Para 2.4.11 "Bent-out crossings of minor roads" may provide assistance with the crossing of St Andrew's Gardens. Note also the 10m set-back distance for crossings of minor roads where cycle traffic does not have priority. The current arrangement is clearly against DMRB.

*This raises more questions about the St Andrew's Gardens crossing and why proper procedure has not been followed.*

Para 2.4.3 mentions the need for signalised crossing to have advance cycle detection, and keep-clear markings. Attention is drawn to 2.4.5.1, cycle crossing times.

*Are these being provided at Harwich Road and Ipswich Road??*

Section 2.6 looks at cycle traffic at roundabouts.

*Bearing in mind the hostile nature of the planned Colchester roundabouts, I would point out that cycle traffic is not prohibited. In this case the roundabouts' design should have appropriate geometry to reflect the fact that cyclists may use them.*

### **Equality Act 2010**

My complaint over Mile End Road highlighted key issues with regard to the Equality Act 2010. The Ombudsman opted not to adjudicate on EA because as complainant, I did not have a “protected characteristic”, saying that an individual challenge would be a matter for the courts.

However, I still have issues with how ECC interprets both the EA and the accompanying [Brown Principles](#). I believe that if ECC carried out the procedure correctly, the process would result in different outcomes that would not only help people with “protected characteristics” but cyclists and pedestrians in general. Note that in Cambridge, disabled people find cycles useful as transport and refer to them as “[a rolling walking stick](#)”; here in Colchester there is a cyclist who walks with a stick for short distances but finds he can cycle for up to 15 miles with little discomfort. [The DMRB cycling note](#), in para 2.2.4, looks at the various types of cycles used by the disabled. In cities where there are protected cycleways, these are shared with disabled people and the elderly who use wheelchairs and buggies, giving them a better surface and greater priority than if they used the footway.

At present ECC makes an overarching impact assessment (EQIA) on the package of schemes, in this case the Selep local growth fund transport schemes, with just one of the projects being Ipswich Road/Harwich Road.

In a response to an FoI request on October 25 2016 (ECC1137204 10 16) ECC said a specific EqiA would be prepared. However, in another FoI response on November 9 2017 (ECC3295713 10 17), the county referred only to the original overarching EQIA. The assumption has to be that a specific EQIA does not exist.

The Brown principles stress the importance of a “conscious approach” as a scheme is developed and put in place”.

I contend that ECC’s interpretation of its duty is wrong

Among items in the overarching EQIA are the terms: “widening access to employment”, “driving sustainable economic growth”, “safe and sustainable transport ... widening access to education, training and health services and supporting independent living”. At 3.1 it says “Individual people have their own specific transport requirements”. At 2.6 it says that the EQIA is guided by LTP3, for which a consultation was held; this highlights that younger and older people are “less likely to have access to a car” and that some disabled people “are disadvantaged by not being able to access transport”. It notes that women “are less likely to cycle than men in the UK” as well as “the ability to travel and the modes of travel available are influenced by income; the modes of travel available are influence by income” ... [and] transport choices can help to address health inequalities by encouraging active forms of transport.

Rowena Macaulay, a disability campaigner, points out: “*EqIAs should be completed as intended, fully and meaningfully, in accordance with guidance provided by the EHRC as a means of meeting the*

*Public Sector Equality Duty. Doing the relevant research and providing argument and evidence for decisions taken is key to any serious completion of an EqIA, and involving/consulting with those people likely to be affected by proposed changes, or with the local groups representing them (in addition to collecting data etc) is [...] central to that process.”*

Ms Macaulay adds: *“Even though ECC acknowledge the SELEP project as a ‘new decision’ and one relating to ‘transport schemes contained within Essex County Council’s Local Transport Plan (2015-21)’ the EqIA refers to a consultation with relevant user groups conducted prior to 2011 — at least seven years out of date.”*

Hilary Reed, another campaigner, adds: *“An EqIA on each scheme would be the best way of ensuring that ECC can prove it has shown due regard. A desktop EqIA is not sufficient. Evidence of live scheme consultation — evidence gathering — is needed, which requires a community development approach.”*

### **Air quality and public health**

The main issues to do with air quality and how Essex has neglected the matter with regard to this scheme [are covered above](#).

Media headlines relating to air quality over the past two years include:

[“Air quality contributes to deaths of more than 100 people in Colchester every year”](#),

[“Air pollution kills 375 people a year in south Essex with many more having years shaved of their lives, health experts estimate”](#),

[Death from air pollution would be cut if UK hits walking and cycling targets”](#),

[“Stanford-le-Hope \[Essex\] is officially the most polluted town in the UK”](#), and

[“Diesel fumes 'biggest health catastrophe since Black Death”](#)

Without doubt, this prominent issue should be high on Essex’s agenda (it assumed responsibility for public health from the NHS in 2013), and groups such as Colchester Medics For Safer Roads have pressed it to take action.

Essex’s main public health report, however — the 76-page [People in Essex Enjoy Good Health and Wellbeing](#) — has just one mention of “active travel”. It does not mention air quality or pollution.

*Given national and local publicity about the danger of air pollution, I would have expected ECC highways to use data to influence design decisions. If highways staff failed to act, then public health staff should have been ready to follow up. This lack of consideration shows the deeply ingrained car culture at ECC that permeates all its functions.*

What could Essex be like if ECC took more responsibility and followed policy documents more closely? [Part of the answer is given in this report](#), the first part of which reads: “More than 12,000 premature deaths from air pollution would be prevented over ten years, if both England and Scotland reached their respective official goals to get more people to walk and cycle. In addition, there would be £9.31bn worth of benefits to the economy over the same time period.”

## **Colchester Local Plan**

[Link here](#)

The transport and accessibility policies (section 5.6, TA1 and TA2) in the adopted Local Plan point to the need to increase cycle use and control peak-time traffic entering urban Colchester, with a target of 33,400 vehicles by 2011. It also stresses the need to reduce the percentage of children travelling to school by car.

*How has Essex considered the Local Plan in developing this scheme? How can it hope to reduce traffic and increase cycle use unless it caters properly for cyclists??*

## **Cycling Strategy**

Essex Cycling Strategy identifies cycling as one of the solutions to congestion in our towns. Any transport infrastructure project targeting congestion must consider increased cycle use as part of the solutions.

The national target, adopted by ECC, is to double the number of cycle stages over 10 years, which would represent a significant modal shift. The date set is 2025, just seven years away.

This target can only be hit if all infrastructure schemes incorporate measures, as outlined in policy documents, that will increase cycling's attractiveness and increase cycle use. The strategy has as an outcome "sustainable economic growth for Essex" — through reduced road congestion.

*This A133 scheme neither acknowledges the role of cycling in reducing congestion — especially with the absence of a north-south route — nor shows how it will contribute to the ECC cycling targets. Instead it makes these targets even harder to achieve.*

## **Essex Sustainable Modes of Travel strategy**

The ECC [Sustainable Modes of Travel Strategy](#) sets out various points to increase active travel. Note that it is unclear whether this document forms part of Essex's public health strategy, or the extent to which the highways and public health teams have been involved in its preparation.

With the exception of the retention of various crossing points (one under pressure) and a degraded east-west cycle route, nothing has been done in this A133 scheme to assist take-up of active travel.

The ECC strategy refers to the National Planning Policy Framework and its aims to support sustainable development; reduce the need to travel; promote sustainable transport and alternatives to the car, and provide transport choice. It says: "Provision of travel choice is a key issue in securing easy access to jobs, health and education."

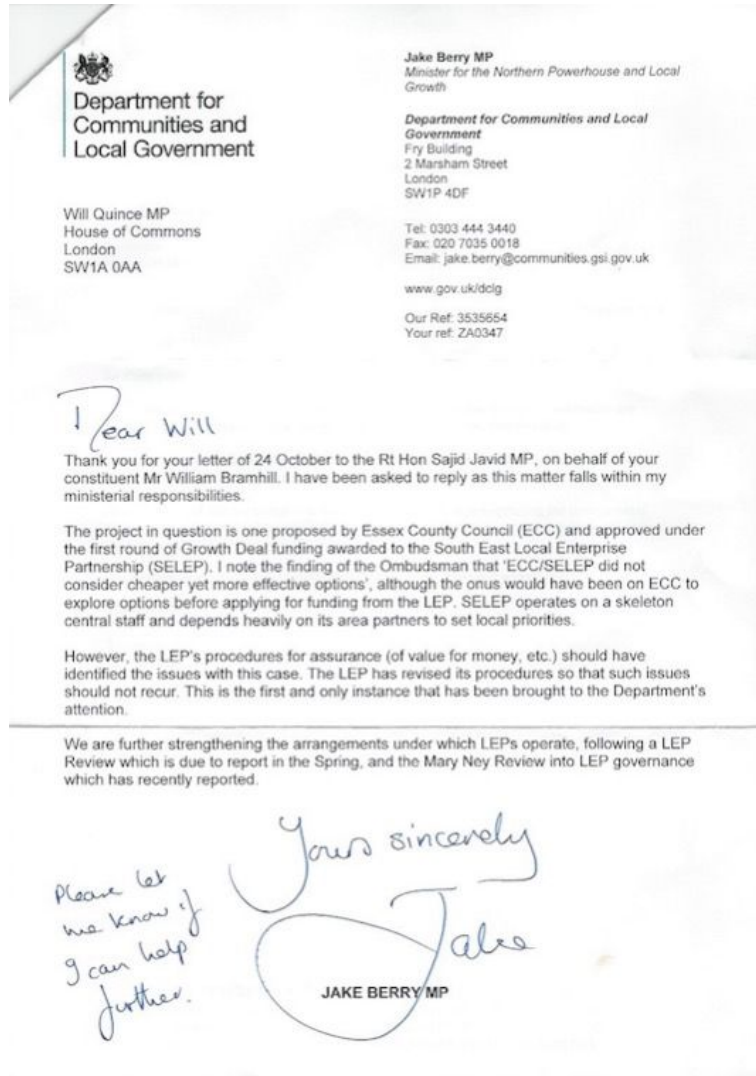
*We would like to see evidence that the strategy has been considered with regard to this scheme.*

## **Other issues: more policies**

Any review ordered as a result of this complaint should also consider TD 22 (DMRB 6.2.1) and Advice Note TA 48 (DMRB 6.2.2), TA 91/05 Provision for Non-Motorised Users and Local Transport Note 1/12 Shared use routes for pedestrians and cyclists.

### Other issues: the Jake Berry letter

See the letter from Jake Berry, minister for local growth, responding to my query (December 2017).



*It is clear that Selep is still failing in its supervisory duty. There are serious question marks over how this scheme was conceived and presented. Given that the criticism over Mile End Road included "ECC/Selep did not consider cheaper yet more effective options", I wonder how many options were considered in this scheme and whether they were all biased to motor transport to the exclusion/degradation of active transport. At the least, the major breaches of LTP3 and failures with regard to air quality should have been picked up early stage, especially given that they are outlined in Selep's business case executive summary.*

### Other issues: the lessons not learnt through bloodymindedness

We have tried for years to get ECC to look at Dutch and Danish cycling practice. In both countries, the continual and well-funded provision of high quality infrastructure and connections has resulted in a high proportion of local journeys being cycled. [Utrecht's record is typical](#) — and each cyclist is replacing a car. Is it any wonder Essex traffic is at crisis point?

London has started taking note of continental practice. In 2015, the capital's daily average cycle stages and trips by cycle hit 0.67 million, comparable with the number made by private cars and up 63% from 2005. This shows what consistent investment and funding can achieve. The two major routes in London are the north-south Waterloo bridge and the east-west route from the Tower to Westminster, both of which are cycleways next to major distributor roads with frequent crossing points.

### **Other issues: the Kevin Bentley letter**

In an email to me on December 13 2017, Cllr Kevin Bentley said (my comments in italics):

Dear Will,

#### **Ipswich Road – Harwich Road Scheme**

Thank you for your email to Cllr Grundy. He has passed this to me as major infrastructure is part of my portfolio and please accept my apologies for not getting back to you sooner on this. You have raised several concerns:

#### **Update drawings**

The drawings have been updated following consultation and a link to the latest set on our web pages can be found here: [Revised A133 Ipswich Road Harwich Road Layouts](#) . These move the design on from those you have recently viewed.

*This involved the reinstatement of the Cowdray Avenue crossing and widened shared-use cycle paths.*

#### **Design bias against Cyclists and Pedestrians**

I would take issue with your view here. This junction complex especially at Ipswich Road is now handling more traffic than when it formed part of the A12. With expansion in the Borough running in excess of 800 dwellings every year the A133 will remain as a major traffic distributor and its re-design reflects this. Clearly there is a need for cyclists and pedestrian to cross the road and there remain three crossings at Ipswich Road, one of these for cyclists and three crossings at Harwich Road, again one of these for cyclists . We did look at north to south cycle movements but concluded these couldn't be accommodated at the revised crossing points between the roundabouts.

*Cllr Bentley ironically points to induced demand — and his priority: motor traffic. He clearly believes the only way to halt congestion is by increasing roadspace. Cyclists and pedestrians are an “also-ran” afterthought. Given the policies, strategies and guidance in place, and the legal duty set by the Equality Act, Essex should have used far more imagination with development and design. Considering the fact that this is a pipeline scheme developed over several years, more should have been done to try to cater for north-south cycle journeys, including further land acquisition to make the scheme viable according to policies..*

We have in fact upgraded and improved the existing zebra crossings on the A133 to signal controlled crossings,. We have also reviewed the length of the existing segregated and unsegregated shared cycle/footway making improvements to the widths where viable. Additionally the whole corridor will be renewed, reflecting a similar overall enhancement of the area in a similar manner to the recently completed A133 Colne Bank Ave widening scheme, making it a more attractive and user-friendly corridor for all modes of travel.



*“Upgrades” to pedestrian crossings are dealt with above; they are largely upgrades to aid motorists. Given traffic levels there is now way the corridor will be “more attractive”.*

### **Doing Nothing or Doing Something**

We must act at this location or risk total gridlock. The A133 is a multifaceted corridor with people making all manner of journeys along its length, joining and leaving at the major intersections. Some journeys may be shorter but many more will be medium or longer distance particularly for business or commercial traffic.

I do not accept that we should be attracting more cycle usage at this location. An east to west route runs alongside the A133 which is lightly used probably reflecting the fact that the corridor is used for longer distance movements. Most cycle routes or desire lines, whichever points of the compass they try to link up, would be better provided away from what will always be a heavily used traffic intersection. Overall we feel we have the balance right at the junction.

*As mentioned previously, Essex’s policy over 70 years of increasing roadspace has failed dismally — and will fail in this instance. What is more, the space taken by the wider road will confine opportunities for future improvements for cycling provision. Essex should be doing far more to persuade people to cycle or walk for short journeys, as mentioned in its own policies and the Colchester Local Plan. A small reduction in traffic will have a huge effect on congestion.*

### **Air Quality Improvements**

It is well documented that stationary traffic and stop-start staccato traffic produces more pollutants and our new design will allow traffic to move more freely and thus reduce these harmful pollutants.

*Is this view really the extent of Essex’s scientific consideration of air quality? Mr Bentley’s statement appears to be gut feeling rather than fact. Yes, free-flowing traffic does produce less fumes but there is no guarantee that the junction will eliminate congestion to any significant extent. It will certainly cause traffic growth, not just at the Harwich Road AQMA but at Ipswich Road/East Street and neighbouring Brook Street.*

In conclusion I accept that you feel that this project could have provided a different balance of provision but we have taken the view that this is a high capacity traffic intersection and that it would be important to see this efficiently rearranged. Rest assured that we have substantial cycle network aspirations and I feel our attention for cyclists should be directed at these wider plans.

*Here we get to the nub of Mr Bentley’s argument: we don’t want cycle traffic getting in the way of cars. “Efficient rearrangement” involves motor traffic only and degraded/unimproved cycle provision. As shown in our analysis and maps, potentially thousands of people, especially schoolchildren and workers, will be disadvantaged by being unable to make north-south cycle journeys — with the provision of extra capacity a point stressed by the DMRB.*

*This stretch of road was recognised as a key east-west corridor by Colchester council when it installed the original cycle route in the 1980s, when north-south use of the carriageway was possible. Mr Bentley points to the light level of cycle traffic along the section of road in question and makes an assumption that cyclists would not want to use this route if it were improved. CCC would argue that low cycle use is due to the lack of quality cycle provision — by which we mean of sufficient quality (including design speed), directness, efficiency and subjective safety to be used by anyone aged 8-80. In London daily average cycle stages and trips by cycle in 2015 hit 0.67 million, comparable with the number made by cars, and up 63% from 2005. This shows what consistent investment and funding can achieve. The two major routes in London are the north-south Waterloo bridge and the east west route from the Tower*

*to Westminster, both of which are cycleways next to major distributor roads. There are clearly more ways to limit congestion than increasing road capacity. London has taken space away from cars on the A3211 to install a high quality cycling facility.*

## Questions

I started this document with the aim of keeping questions to a minimum but inevitably some queries have arisen. My apologies for the length of this list. For brevity I've taken out "please" on most questions but I am most grateful for ECC's work in answering these.

### **Design specifics — cycling**

:: Did ECC commission a survey on current and potential cyclists' desire lines in the area of the junction? If so, provide dated documentation.

:: Has ECC tested its design against the LR1120 accident prediction model, especially the main roundabout (north-south trips) and the St Andrew's Gardens junction? If so, provide specific documentation.

:: Bearing in mind the [lack of verges](#) between the shared cycle path and the carriageway, will there be a 30mph limit through this area? If so, provide specific, dated documentation.

:: Will the two puffin crossings feature advance cycle detection as recommended by DMRB?

### **Design specifics — walking and cycling**

:: Did ECC formally consider "cycling design speed" before specifying a shared-use path? If so, provide specific documentation.

:: Is there an HD 42/05 Non-Motorised User Audit? Please provide this or say why one has not been completed.

### **Design specifics — driving**

:: May I have an assurance from named senior council officers they are satisfied that a) the Ipswich Road roundabout and b) the Harwich Road roundabout will handle as much motor traffic as efficiently as the previous junctions in the event of a breakdown/shunt affecting circulation?

### **Design — general**

:: When was the core design of "one roundabout at each junction" first developed? When was the first iteration in an engineer's drawing? Was it one of the schemes from 2002-3? Our data analyst says the promoters/engineers should have produced "an intersection / junction model; ideally this will be a comparative model, looking at multiple alternatives, including the current design". Please provide specific documentation to show that these alternatives were produced and considered. She says they should also have produced "a system model to include the effect on traffic flow, delay and accident rates, not only in the immediate area but across the network" (ie, knock-on effects to A120 and A12,

as well as the other way around). Please show that modelling for a bigger A12 and A120 is included in the present plan.

:: After the Waitrose land acquisition in 2008 was further acquisition considered from any other landowners and if so when? Was it ever discussed during the development of this scheme? If so, please provide specific documentation.

:: In which country(ies) was the design developed/drawn?

### **Design — policies and guidance**

:: Has ECC asked for any relaxations from DMRB rules to do with any part of this scheme? If so, provide specific documentation.

### **Design — capacity**

:: If the core design of single roundabouts is older than January 1 2016, has the design been reviewed since to include consideration of the sustainable ethos of the nearby garden community? Has traffic modelling included the effect of the garden communities in particular? Please show that the garden communities are specifically referenced in the traffic modelling report(s).

:: Which team of officers decided that a three-lane single roundabout would handle traffic as efficiently as the current layout. Did they model the design for the effect on flow in the event of a shunt or breakdown? If so, provide evidence by way of minutes/notes.

:: FoI response ECC1137404 10 16 says traffic growth figures are “based on Tempro”. What other sources has ECC used to assess the anticipated increase in traffic?

:: Please provide all safety audits for this scheme.

:: Provide evidence (documentation/minutes/memoranda) that the team producing this scheme has consulted each of the documents outlined in Policies, Strategies and Legal Duties (to include the Equality Act only if the situation has changed since the FoI response of November 9 2017).

### **Policies**

:: We would like to examine the process that led [Kevin Bentley](#), in his email of December 13 2017, to be able to make his statement: “I do not accept that we should be attracting more cycle usage at this location.” Has ECC gone through each of the policies advocating better cycling provision and specifically rejected it? If so provide documentation.

:: Who took the decision to exclude north-south routes for cyclists and when? Provide a record of this decision with the reasoning behind it and how it was tested against policy/strategy..

:: Supply details of all feasibility studies, policy reviews and cycling capacity studies used or developed as part of this scheme.

### **Reducing congestion**

:: Have any (and if so how many) origin and destination studies been done at this junction within the past two years to assess the level of traffic making journeys of three miles or less (an ideal cycling/walking distance)? Provide the relevant report.

### **Social isolation**

:: Have any studies/reports on social isolation been commissioned or considered by the team developing this scheme? Please provide them.

### **Consultation**

:: Have the views of stakeholders, in particular Colchester Council (which is developing its next Local Plan) and North Essex Garden Communities Ltd, been taken into consideration? If so, how? Again, produce evidence.

### **Air quality ad public health**

:: Given ECC's responsibility for public health, including air quality and active travel, why was air quality not considered as this scheme was developed and at a point where it could influence the design?

:: Why does Essex's public health team avoid highways issues, for instance in the [People in Essex Enjoy Good Health and Wellbeing](#) paper. How does ECC define the function of public health and highways in such a way that they do not overlap?

### **Selep**

:: Could I have documentation to support every instance where Selep has formally exercised its procedures for assurance, including on traffic modelling and the decision to go ahead with single roundabout junctions? Provide documentation.

:: Were a variety of schemes put before Selep or did it simply accept a variation of ECC's pipeline scheme?



