



Colchester Cycling Campaign
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Dear Sir or Madam

We object to both the removal and/or the relocation of the crossing on Colne Bank Avenue, Colchester, as a standalone scheme.

Our grounds for objection are:

- ECC has produced no data to support its assertion that moving the crossing will alleviate congestion or affect park-and-ride buses. Officers mention a "perceived benefit", as if this is a gut feeling, rather than one based on fact. Without figures, the scheme **lacks credibility** and removing or relocating the crossing will be **an inappropriate use of public funds**.
- The ECC **safety audit** for a replacement crossing, now the county's preferred option, has **not been carried out and/or published**. This should form part of consultation with interest groups before the TRO is issued. The proposal for replacing the crossing, **taking it away from the desire line**, includes an extension to the 40mph limit; however, the current crossing is immediately adjacent to a 30mph zone and roundabout, and vehicle speeds are correspondingly slower; the audit would need to consider:
 - i) the effect of **greater impact speeds** and the **greater likelihood of deaths and severe injuries**, even when the crossing is used properly. At 40mph, the odds of a pedestrian/cyclist death are 85 per cent; at 30mph the odds are 45 per cent. Aside from human suffering, the economic case of increased severity in collisions must be taken into consideration. The cost of a fatality is £1.9 million while the cost of a serious injury is £220,000¹. The council's public health department should have an interest in road casualties, and Highways should be sure to formally consult its ECC colleagues.
 - ii) crossing users' **judgment of the faster speed**
 - iii) crossing users' judgment given that users are **mainly children and young people** (See [this report](#), and [this study](#), which says "speed discrimination has a reasonably protracted developmental trajectory, reaching adult levels only by mid-to-late childhood").
 - iv) traffic light phasing. The phasing at the current crossing **disadvantages and inconveniences pedestrians and cyclists**, and if replicated at the new crossing could be expected to lead to

¹ [Dept for Transport](#)

greater noncompliance (walking around barriers and crossing against a red light, especially when traffic is light)

- ECC has not published a report under **Public Sector Equality Duty legislation**. This would be important in any case but is particularly so given that this crossing is used by a substantial number of children and young people, as well as young people with learning disabilities who walk between the station and Colchester Institute.
- ECC has not published figures for the **number of pedestrians/cyclists using this crossing, age/ability profiles, or any origin/destination data**. Such figures should be available to determine the extent to which a relocated crossing will be used and is, therefore, a realistic option. For instance, relocation will add 600 metres (nearly doubling the distance) to the journey for people using a new crossing to access Rowan House, St Mary's housing estate or the Matalan retail park.
- Based on its own policies and strategies, which aim for a greater level of active travel and behaviour change, ECC must consider the negative effect of removal/replacement on congestion. If necessary, active travel and behaviour change should be compared with ECC policies/strategies on congestion. Questions to be asked:
 - i) is it likely to increase road collisions (on the crossing and other routes) with a corresponding increase in congestion on the network
 - ii) is it likely to lead to more people making a journey by car instead of cycling/walking
 - iii) if ii) is positive, is it likely to lead to an increase in car dependency and pollution.

Finally, we are concerned that Rodney Bass, cabinet member for highways and transportation, is calling the replacement crossing a temporary facility. We note that there is nothing in this TRO that says a new facility would be temporary.

Will Bramhill
Planning Officer, CCC