



Colchester Cycling Campaign
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TRAF/4747

Dear Sir or Madam



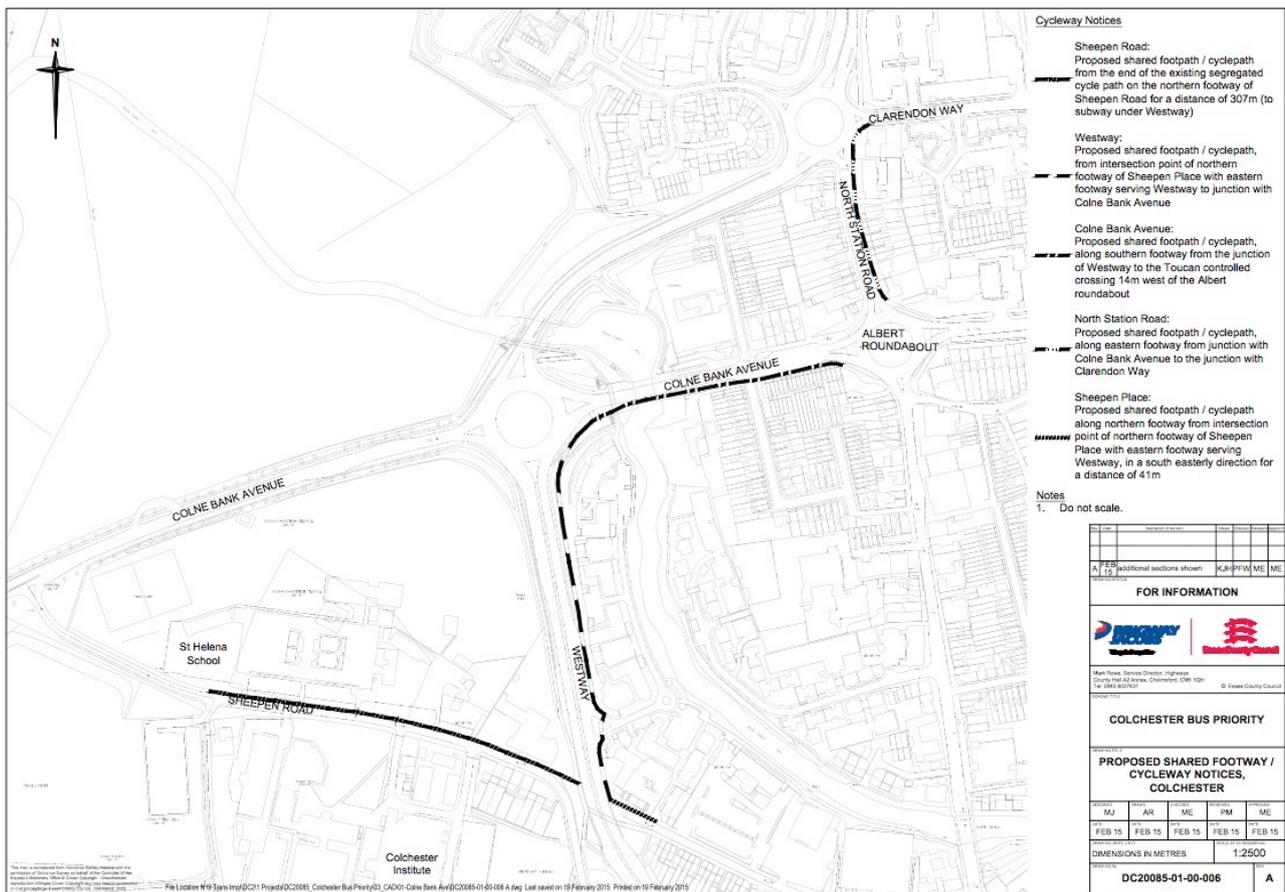
CCC opposes the scheme set out by TRAF/4747 on the grounds that this is obviously intended as a replacement for the Colne Bank Avenue/Cymbeline Way crossing (TRAF/4741). We are not opposing new cycling infrastructure *per se* but we are against the proposed provision because it is unnecessary and vastly substandard (especially so in a former government-appointed cycling town).

To date Essex Highways or the portfolio holder have not answered the criticisms set out in CCC's objection to TRAF/4741. The text of our objection to TRAF/4741 is included below.

Background: CCC has lobbied for 25 years for better facilities for cyclists in Colchester. We formed a good working relationship with Colchester Borough Council (when highways agency) and later ECC Highways. This culminated in a successful joint bid for government cycling town status. During this period (2009-11), ECC officers, CBC and CCC worked together to model schemes to help utility cyclists, and we were consulted about these, in general and in detail. Over the past 12 months, however, this relationship has soured, with ECC becoming secretive and uncooperative. As a result, CCC has had to resort to FoI requests for information and to using the local press to exert influence.

In this instance: The ECC proposal to remove the crossing at Colne Bank Avenue/Cymbeline Way was flagged up at a cycling forum but there was no chance for discussion. We found out about this particular scheme (TRAF/4747) only because we check the council's list of TROs. There has been no consultation on the need, desirability or the details of the scheme. This is despite it being best practice to have stakeholder involvement in the design process. [See LTN 1/11](#).

The thrust of this scheme should be contrasted against national moves to improve cycling infrastructure with high quality provision. Cycling has been recognised by the government as an



effective and cost-effective way to reduce congestion. See <http://www.thetimes.co.uk/tto/public/cyclesafety/article4331991.ece>,

Under TRAF/4747 it is proposed to replace relatively good and direct cycle/pedestrian infrastructure with poor and indirect provision that would have a greater number of points of conflict, hugely increasing subjective risk and the danger of collisions.

Comparing both schemes, the current route (red on map) is 780m from the southern entrance of the station to Sheepen Road. It includes two conflict points¹ (Essex Hall Road and Colne Bank Avenue/ Cymbeline Way; one uncontrolled and one one-stage toucan crossing). The proposed route (blue/ yellow on map) is slightly longer at 860m but is far less direct; it does not follow a desire line and will take longer to walk/cycle. It includes 11 conflict points, seven uncontrolled, two part of a pelican crossing and two part of a toucan crossing. Four of the uncontrolled crossings (Clarendon and NSR South) are immediately adjacent to roundabouts with no priority for pedestrians or cyclists.

With regard to cyclists, the scheme does not include details of how cyclists should cross North Station Road (north of the Essex Hall roundabout); Clarendon Way; North Station Road South (between Majestic Wine and No 82 North Station Road); St Paul's Road or the slip roads into Rotary Way. Cyclists have no legal status on pelican crossings, and many of the central islands (NSR north, Clarendon Way and Cowdray Avenue) are too small to accommodate cycles, even when not ridden.

¹ A conflict point is where pedestrians and traffic meet; a central island is in effect two crossings.

We would point out that the Essex Hall and Cowdray Avenue crossings, the Clarendon Way crossing and the footways alongside North Station Road are packed with pedestrians and are unsuitable for cycle/pedestrian shared use at peak times. The North Station Road footway was shared use until 1999 when, following pedestrian complaints, it was narrowed and returned to being a footway only. The Westway subway is also packed with pedestrians at peak times, sight lines are poor and the geometry of footways on the western side make it unsuitable for cycling.

Your proposed route is so unsuitable that it is not included on the Colchester Council cycling strategy map, which shows cycle routes that should be funded under s106 agreements of the Community Infrastructure Levy.

We request:

- That you take into account our arguments against the abolition/removal of the Colne Bank Avenue/Cymbeline Way crossing as set out in our response to TRAF/4741 with particular note taken of the arguments on safety, equality, reason and inappropriate use of public funds.

In addition, we urge you to drop this proposal on the following grounds:

- It adds more expense to the inappropriate use of public funds highlighted in our objection to TRAF/4741
- No account is taken of the extra danger for walkers or cyclists through the increase in traffic conflict points
- No account is taken of the desire line/journey time for walkers or cyclists (the extra time for the journey will mean people may try to use the site of the existing crossing as a short cut)
- No account is taken of the weight of pedestrian traffic and the suitability of shared use at peak times at key points

We query:

- whether ECC had undertaken a cycle/pedestrian count/O&D and profile survey.
- whether ECC can show that it has given due regard to the needs of protected groups under equality law
- whether ECC can show reasons for departing from national guidelines/best practice and its own policy/strategy on cycling and walking

We note:

- that ECC intends to make North Station Road (Albert to Essex Hall roundabout) a two-way bus lane; in the medium term, this would be acceptable to many cyclists as part of a cycle route if it could be made continuous in a northbound direction (medium-term only: ECC must eventually provide wholly segregated cycling facilities to address inequalities for children aged 9+ who wish to ride unescorted to school (the European average age for such an activity).

Will Bramhill
Planning Officer, CCC

Colchester Cycling Campaign response to TRAF/4741, dated 20 February 2015

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 £220,000². 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 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

² [Dept for Transport](#)

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