



National Highways
A12 Chelmsford to A120 Widening
Supplementary Design Consultation

By email to: A12chelmsfordA120wide@highwaysengland.co.uk

17 December, 2021

Dear madam / sir,

Objection to A12 Chelmsford to A120 Widening scheme

Transport Action Network is a not-for-profit organisation set up to champion sustainable transport and help local communities oppose damaging developments, including new roads, and bus cuts.

We do not believe that road building is a sensible option in a climate emergency when it will increase carbon emissions at the very time we need to be rapidly reducing them. We also object to National Highways holding a consultation without adequate information as, for example, the construction emissions have not been estimated and figures referenced in the Preliminary Environmental Impact Report (PEIR), which itself is hard to find, are not readily accessible.

This difficulty in finding information undermines the public's ability to fully appreciate the implications of constructing this new road, which is predicted to result in a substantial increase in user emissions over its 60 year appraisal period. This additional 1,350,926 extra tonnes of CO₂e is not even presented to the public. They have to work it out themselves by comparing Table 15.6 and Table 15.12 in the PEIR.

The bigger road will also result in more noise and air pollution for local communities along the route and with no known safe levels for PM_{2.5}s and nitrogen dioxide, just meeting legal limits is not enough of a consideration. More thought needs to be given to reducing air pollution to World Health Organisation guidelines to reduce the impacts on both humans and habitats. Reducing traffic, rather than increasing it is one of the best ways of doing this.

While the use of a low noise surface is welcome, it's not clear whether this extends for the total length of the new road or whether it's just in certain sections. Also, there need to be guarantees that the low noise surface will maintain its low noise qualities over time and be properly maintained or replaced to keep the noise improvements. Otherwise, any gains in noise reduction could be lost over

time and indeed residents could find themselves worse off than what they are suffering at the present.

Another unwelcome impact of this proposed scheme is the loss of soil that is classified as very good. This is not something that can repeatedly be ignored, especially as there is a need to grow more local produce for a whole host of reasons, including national food security and climate change.

Misleading consultation

The non-technical report of the PEIR from the summer consultation is far from a proper non-technical summary that is required under Environmental Impact Regulations. It is over 40 pages long and contains a wealth of technical jargon, that will put many people off from reading it. This will then deny them the opportunity to learn more about the scheme's impacts.

However, more worrying is National Highways marking of its own scorecard, saying, for example, that there will be an overall positive impact on active travel. This is highly questionable given what is contained in the proposed designs. Just providing a crossing, for example, does not improve active travel if it is awkward, inconvenient and unattractive to use.

A classic example of this is on page 9 of the non-technical report which claims that a highlight of the facilities proposed is: *"a new controlled crossing which would allow both walkers and cyclists to cross the A120 safely, and a new bridge for walkers and cyclists at junction 25"*. It may well be true that National Highways is building a new bridge and crossings, probably because it is widening the A120 and therefore has to, but these facilities currently exist in this location and it is not clear what benefit the new designs bring that are not catered for already. So claiming this as a highlight of the facilities proposed is dressing mutton up as lamb. It is providing nothing new in way of connectivity or attractiveness yet is presented in such a way that misleads people into believing it is an improvement over the current situation. What would be an improvement over the current situation would be a straight-over crossing of the A120, or for the bridge to extend over the A120 as well as the A12. That would reduce both time delays and conflict.

Elsewhere, the non-technical report fails to mention the 8,000 plus residences that will suffer an increase in noise, albeit that it's predicted to be slight. That's still a significant number of people and warrants being mentioned. Also, this number is potentially an underestimate as the study area has been limited to 200 metres either side of the centre line of the new road, when it is clear from looking at the noise maps, many more people in Witham and Kelvedon, for example, will see a rise in noise pollution beyond this distance. This information also appears not to consider wind-blown noise, which for communities east / north-east of the road such as Witham and Kelvedon will mean that even more people will potentially be adversely affected by the changes.

However, this information in the non-technical report is not available in the latest consultation, nor is it directly linked to, nor is there any update to the report in light of the changes proposed. This is denying the public the opportunity to understand the true nature of the overall development. The same is true for other important information such as noise maps for the whole route. The only additional environmental information provided is a 72 page report about the impact of the proposed changes.

This might be welcome but without a clear non-technical summary it will not be read by most people and without these changes presented alongside the main scheme changes proposed, people are not given an overall impression of what the latest scheme designs will mean. The public cannot be expected to retain information from earlier consultations, or to be able to assimilate the new changes in their heads, to fully understand the overall changes being proposed.

Design overkill

The new road, at six lanes wide would seem to be complete overkill, especially where the existing dualled A12 is being left in place. That would create, 10 lanes of road, where there are currently only four. There is no way that amount of tarmac is required and it will only encourage even greater car use and pollution. Even the Department of Transport traffic estimates predict a 50% rise by 2050 and these take no account of the need to reduce traffic and carbon emissions. Given the climate emergency and more and more studies saying we need to reduce car use and traffic levels, the need for such a huge new road is highly questionable.

If though, a new road is being built and the old A12 is being left in place, the old dual carriageway should be made single carriageway for motor vehicles and the remaining space given over to creating a high quality active travel corridor between Kelvedon and Marks Tey and from there get people over the new A12 to provide the opportunity for Essex County Council to provide a route into Colchester. Opportunities to extend the route to Witham should also be explored. If appropriate, bus lanes or bus priority measures could also be considered given some of the existing A12 is being bypassed in-between Witham and Kelvedon.

Any surplus road space after allowing for the above improvements should be removed and the area set aside for biodiversity improvements.

Poor and substandard active travel provision

The provision for active travel is poor for with sharp turns and multiple crossings, many of which do not look like they are LTN 1/20 compliant. Junction 19 has controlled crossings but to traverse from north to south involves six separate stages that need to be negotiated, exposing people to long delays and high levels of noise and air pollution in the process. These will be far from attractive and will undermine active travel.

Similarly, junction 21 will require seven stages to cross busy roads from north to south, but in this case all of these are uncontrolled, several of them with active travellers having to cross three lanes of traffic. This will be far from easy or pleasant and demonstrates how little thought is going into designing useful active travel infrastructure.

Greater care should be going into providing ways of crossing busy and complicated junctions which completely separate people from traffic or minimise any interactions and hence delays. These multiple crossings appear an afterthought, a box ticking exercise, with little thought to the desirability and attractiveness of what is being proposed. It is questionable that they are in line with Government desires to increase active travel or conform to the requirements of the National Policy Statement for National Networks (NPSNN).

Where there is an opportunity to do something better, it is often badly designed, unattractive and inconvenient. It's hard to see how these designs meet National Highways' own criteria to: *"Improve the quality and capacity of existing walking, cycling and horse riding routes, and seek opportunities to create new routes"*. Payne's Lane footbridge (a misleading title given it says elsewhere this is a shared facility), for example, should at the very least have a straight ramp up to the bridge from the north, rather than the zig-zag ramps which add extra length to journeys close to a very noisy road, making them unpleasant to use. Options for a straight or curved ramp down on the southern side should also be explored. These improvements would then provide an attractive alternative to crossing junction 19 at grade for some journeys, but as they stand, they are awkward and uninviting. The fact that this doesn't appear to be a consideration along with the poor design of junction 19 itself, shows how little thought has gone into active travel measures.

Gershwin Boulevard shared cycle bridge, at least more clearly acknowledges its use for cycling but again the design is shockingly bad with its switchback or zig-zag ramps. The use of switchback ramps should be minimised with ramps extending along the desire line as much as possible to minimise the extra distances active travellers will have to make. It should be acknowledged that in most instances active travellers are already having to pay a price for the road by having to go up and down to get over it. Making them take substantial detours in close proximity to a noisy and polluted road adds insult to injury.

The use of bridges or underpasses should be considered elsewhere more frequently (instead of the ridiculous number of crossings being proposed) to enable safe, continuous and more attractive routes to be created.

Overall, we are not convinced about the need for such a huge scheme. There are better and more efficient ways of dealing with safety issues which would help reduce the carbon footprint and social and environmental impact of the scheme. At the very least, if the scheme goes ahead as proposed, far greater consideration needs to be given to reconfiguring the old sections of the A12 in favour of sustainable transport, which are largely going to be left untouched. As it stands, the scheme will not only will encourage even more car use, but is a wasted opportunity to provide some good quality infrastructure for active travel and public transport.

Yours sincerely,

Chris Todd

Director