

To:

Mr David Sprunt  
Transportation Strategy & Engagement  
Essex County Council  
County Hall  
Market Road  
Chelmsford  
CM1 1QH

22 January 2018

Email: david.sprunt@essex.gov.uk

Dear David,

**Re : Saffron Walden, Pinch Point Package London Rd / Borough Rd / Newport Rd Option 3**

We wish to object to this scheme because it will have the net effect of: causing more traffic to pass through the town centre, including the heaviest HGVs; increasing pollution inside the Saffron Walden AQMA in areas where the NO2 levels already exceed permitted legal limits; make existing peak traffic queues longer; and create rat-runs of side streets.

Perhaps more fundamentally, it is a struggle for residents to understand why anyone would want to propose such a scheme; as far as we are aware there is absolutely no evidence to justify it, and no background studies of the effect it would have on traffic flows or air pollution have been performed.

We understand that ECC has been requested to undertake this scheme so that UDC can use s.106 funds gained from the Ridgeons development. It would be better not to spend the funds at all than on a scheme where the harm would apparently so clearly out-weigh any benefit, after all s.106 funds are gained for 'community benefit'.

It is also worth mentioning that the current Saffron Walden County Councillor John Moran has been writing to local residents that have objected to tell them that the scheme is an Uttlesford District Council one. As you know, whilst UDC may have requested the scheme, ECC is the responsible Highways Authority, and as such it is ECC's scheme and they are responsible for it and that it is done correctly, irrespective of how it is funded.

You will be aware of the background to the junction proposal probably better than anyone, but our understanding is that the only reason for proposing it was to relieve extra traffic flows when the eastern link-road and concept of making Thaxted Road one-way was proposed in 2013. Even then the only reason for this proposal was because of the knock-on effects of making Debden Road one-way to try to reduce the greater congestion at the London Road/Debden Road roundabout that the Thaxted Road scheme would have caused. We are not aware of any analysis that suggests that this proposal has any merit in isolation, let alone one that would actually seek to do the opposite by increasing the congestion at the London Road/Debden Road roundabout. And in the larger scheme of things in 2014 the Planning Inspector called into doubt effectiveness of the eastern link-road, and

in 2016 ECC distanced itself from the 2013 proposal and eastern link-road due to changes in conditions in the town and the link-road's inability to solve the traffic problem without an external relief east-west road. So why is this out of date and partial scheme even being considered as appropriate by the Highways Authority?

We wish you to either provide the justification and supporting documentation listed at the bottom of this letter or withdraw these proposals, and instead use the s.106 funds to implement schemes which show they will directly benefit the community and town.

In more detail, we object on behalf of the residents of Saffron Walden for the following reasons:

- **Increased HGV traffic through the town centre (and AQMA):** The proposed No-Entry signs at the bottom of Borough Lane would block traffic from accessing the current route for HGVs to avoid the town centre. As an aside a few months ago ECC spent £70k of taxpayers' money resigning this route. Under these proposals, instead vehicles will be forced along London Rd towards the High St and town centre. To avoid the town centre, traffic will have the option to make a 120 degree right turn up Debden Rd, followed by a hill start at the Mount Pleasant Rd traffic signals, followed by a left turn. However HGV satnavs will find the shortest and easiest route across the town is actually through the centre, and not the longer route with multiple turns and a hill start. It is somewhat academic as, unlike on Borough Lane, the former railway bridge on Debden Rd has a 22t weight limit (as does the South Rd bridge), so only the smallest or partially laden HGVs will be able to use that route anyway. Just to be clear, these proposals kill the HGV route that avoids the town centre, and will force the largest and worst polluting HGVs through the town centre. The town centre has the largest occurrences of illegal levels of pollution inside the AQMA;
- **Longer queues in the town:** London Road and the High St are already much more congested than Borough Lane. At peak times the traffic queue backs up 500m from the High St to near the Borough Lane/London Rd junction, and frequently through it.. By blocking off Borough Lane and forcing all inbound traffic down London Rd, these queues will clearly be made longer – 2 roads into 1. Again these queues and junctions are inside the AQMA. We assume it would be unlawful for ECC Highways even to perform the junction work when they know that the direct consequence will be to increase air pollution further above legal limits?
- **Higher illegal Pollution at Debden/London Rd junction:** The pollution levels at the London/Debden Road junction are consistently above legal limits. UDC's latest air quality assessment (published July 2017) shows recorded NO<sub>2</sub> levels 11% higher than the 40 microg/m<sup>3</sup> legal limit; the report shows that in fact unlawful levels of NO<sub>2</sub> levels have been recorded at this junction in 4 of the last 6 years. Forcing all inbound traffic through this junction will worsen air pollution. This is unlawful. Again it is worth reminding you that both the Borough Lane/London Rd and London /Debden Rd junctions are inside the AQMA;
- **Increased pollution at the junction:** This junction is inside the Saffron Walden AQMA, so everything should be done to reduce pollution, rather than increase it. The most recently

published air quality studies for the town show a marked increase in pollution across the town. Signalising the junction will increase queuing and therefore pollution. It is worth noting that this is also a very busy school walking route, so any increase in pollution should especially be avoided;

- **No published analysis of knock-on impact, including to safety:** It has been proven that signalisation increases queue lengths. Traffic will try to avoid the new traffic signals and one-way scheme. This will likely cause rat-runs and increased traffic in the residential neighbourhoods around Spring Hill Rd, Rowntree Way, Cromwell Rd and Winstanley Rd. No data has been published to show the impact to these streets and any knock-on capacity and air quality issues. This should be done before any scheme that creates such an impact so this can be properly considered. It is also worth noting that a number of junctions on these 'avoiding routes' do have potentially worrying safety records. There has been no published study that assesses the impact to safety of more traffic using these routes;
- **Invalid underlying ANPR data:** ECC's recent ANPR study was undertaken at the end of 2017. Unfortunately it was done at the same time as the High St was closed during a week for resurfacing, making the study invalid. The road closure caused changes to regular traffic flows. The study was also taken during the period when the Walden School was closed. The school is in the process of changing hands and the agent has indicated that it will reopen as a school again. Since this school is adjacent to this scheme, its impact to the network is important. To be valid an ANPR analyses should be undertaken again during normal road network conditions, and needs to include assumptions for the open school;
- **The scheme is unjustified:** The traffic flows easily and safely today through the mini-existing roundabout scheme, and with only short peak queues, and none at off-peak times – there are no visible capacity issues. Traffic signals will cause queuing traffic where there is none today. This will be worse if the proposed signals are multi-phase. The London/Borough Lane/Newport Rd junction does not have a poor safety record – in fact it is not even in the top 15 safety concern areas in the town. Only a drawing has been provided for the scheme, but not justification or any supporting information. Without proper supporting evidence it cannot be shown that the scheme is a good or justified use of tax payers money. It is immaterial if the funds to be used to implement the scheme have been gained for the tax payer via Section-106 agreement(s). The scheme still needs to be justified;

As the responsible Highways Authority, we request that you publish all the underlying studies and justification for this scheme, including the scheme rationale; impact model for the whole of the Saffron Walden network; estimated queue lengths at the 4 limbs of this junction, the Debden/London Rd junction, the High St and Thaxted Rd traffic signals; the predicted impact to air quality inside the AQMA, including at each of the key junctions; the sustainability impact of increased journey times and route lengths; the safety audit, including weight limits and for pedestrians/cyclists, due to the increased traffic on Debden Rd, George St, and Hill St; the other options you considered for this junction (since this is labelled Option 3); and your relative ranking of this scheme against others in Saffron Walden that they Section-106 funds could be used against.

If you are unable to provide this justification, on behalf of the residents of Saffron Walden, we ask that you withdraw this scheme immediately.

Yours sincerely



John Lodge  
Chair, Residents for Uttlesford