



Highways Projects
Cambridgeshire County Council
Shire Hall, Castle Hill
Cambridge CB3 0AP

September 16, 2020

Dear Sir or Madam,

The Ely Cycling Campaign works for better cycle facilities in and around Ely and to promote cycling in the area. Camcycle is a volunteer-led charity with over 1,500 members that works for more, better and safer cycling for all ages and abilities in the Cambridge region.

We strongly object to the plans as outlined in this consultation for the Lancaster Way roundabout. They are poor for the reasons listed below, and the project is at risk of losing government funding if it does not comply with the cycling infrastructure requirements outlined in the government's 'Gear Change' policy and Local Transport Note 1/20. Please also see the article on pages 46-47 of the Autumn 2020 (issue 148) Camcycle Magazine¹. Please also reference the planning application 19/01704/FUM correspondence and 6 May East Cambridgeshire Planning Meeting discussion of the inextricably linked application for changes to Lancaster Way.

Currently, the pedestrian crossing of the A142 has a central refuge with one lane of motor traffic in either direction. These plans are designed to increase the volume of motor traffic across the roundabout, which will make pedestrian and cyclist crossing more difficult and more dangerous. They will require pedestrians and cyclists to cross two lanes, which is considerably more difficult and dangerous than crossing a single lane. It opens up the angle that eastbound motor drivers on the A142 need to steer around, so drivers will go even faster than they do now at the point of the crossing. The slackening of the angle of the turn from the westbound A142 onto Lancaster Way, in the approved planning application 19/01704/FUM, will allow motor drivers to take this turn faster and will make the crossing of Lancaster Way more difficult and dangerous. Although not part of these plans, 19/01704/FUM in combination with these plans will make this roundabout profoundly hostile to people walking and cycling.

We reject the claim from the consultation document that '*a grade separated solution would be needed or full signalisation of the roundabout*' for a safe crossing, which they consider to be too expensive to fund. We know that it is feasible to install lower-cost, at-grade, controlled pedestrian and cyclist crossings here, even on a busy rural roundabout arm, according to Local Transport Note 1/20. Furthermore, the Greater Cambridge Partnership is building such a crossing on the A1307 by the Babraham Research

¹www.camcycle.org.uk/newsletters/148/

Park roundabout, in a very similar situation. Therefore, there is every reason to put in controlled pedestrian and cyclist crossings around the Lancaster Way roundabout as well.

If the county council makes the excuse that they are only able to use excessively expensive solutions (that 'cannot be afforded'), then they are disobeying the latest government mandates and appear to be favouring South Cambridgeshire over East Cambridgeshire. **The safety problem at the roundabout is being created by the county council's single-minded insistence on speeding up motor traffic, and if they cannot afford to make it safe for all users, then they cannot afford to make changes at all.**

The following are detailed reasons for our objection to the proposed roundabout plans:

- In the first place, the plans fail to satisfy the National Planning Policy Framework (NPPF), published in February 2019. Paragraph 84 requires that decisions recognise that it is important to exploit any opportunity to make a location more sustainable, for example by improving the scope for access on foot, by cycling or by public transport. Paragraph 91 requires that layouts encourage walking and cycling. Paragraph 102 requires that opportunities to promote walking, cycling and public transport be identified and pursued. Paragraph 103 requires a genuine choice of transport modes. Paragraph 110 requires that applications for development give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas. The proposal fails to comply with any of the above requirements. NPPF is a material consideration in planning decisions. A 'do minimum' scheme, as this plan is labelled, does not exempt it from NPPF requirements. NPPF does not provide for plans that include a commitment to provide mandated changes in a separate scheme at some time in the future.
- The plans fail to satisfy the Combined Authority's Local Transport Plan (LTP) adopted in February 2020, which includes a goal of providing an accessible transport system to ensure everyone can thrive and be healthy. The plans deny this to those who would like to walk or cycle. The LTP has an objective of putting people first and promoting active lifestyles. The plans fail to put people first and hinder an active lifestyle. The LTP also has an overarching strategy that requires all new public transport and highway infrastructure to be designed to include parallel cycling and walking corridors with suitable access and crossing points. The existing crossing cannot be considered adequate yet the plans render cycling and walking facilities worse and certainly do not provide parallel arrangements for active travel. A 'do minimum' scheme, as this plan is labelled, does not exempt it from LTP requirements. The LTP does not provide for plans that include a commitment to provide mandated changes in a separate scheme at some unspecified time in the future.
- The plans fail the District Council's Local Plan (LP) April 2015 Strategic Objective 8, which requires greater opportunities to reduce car use. The plans promote motor vehicle use at the expense of active travel. The LP has a Strategic Vision of providing better cycling and pedestrian facilities and links. The plans make for worse cycling and pedestrian facilities. The LP has a Spatial Strategy and Policy of improving pedestrian and cycle networks between settlements. The plans go against the Spatial Strategy and Policy because they make the network worse.
- The plans fail the guidance provided in the Design Manual for Roads and Bridges, Road Layout Design CD 116 Geometric design of roundabouts Revision 2. Paragraph 8.2 states that where there is demand or the desire to encourage pedestrians, cyclists and/or equestrians at roundabouts, these users shall be provided for.
- The plans fail to comply with Local Transport Note 1/20. The introduction to Chapter 10 requires that the needs of cyclists be taken into account in the design of improved junctions and that crossings be provided where cycle routes continue across busy highways. These plans downgrade the existing crossing. The rest of Chapter 10 provides other guidance that the improved roundabout fails to follow. Table 10-2 shows that the proposed crossing would be unsuitable and exclude most people, especially people with strong safety concerns such as families with children, people with protected characteristics such as disabilities, and older people who move

more slowly on foot or bike.

- The plans fail to follow the government's 'Gear Change' report, which points out (see page 16) that increased walking and cycling can decrease motor vehicle congestion if changes are designed well enough to encourage modal shift towards sustainable modes. Unfortunately, the currently proposed plans for the A142 / Lancaster roundabout will only cause a modal shift in the wrong direction, away from active travel and towards more car congestion.

Note that Electrically-Assisted Pedal Cycles (EAPCs) are becoming more popular and could offer an easy way to travel to and from Ely if there was a safe route. Additionally, electrically-assisted micromobility devices (e.g. scooters) are another mode that people may start using if the crossings at the roundabout were less threatening and safer.

- We do not believe that the currently proposed roundabout changes will reduce congestion in the medium and long term. The A142 is a major thoroughfare for long-distance journeys. By increasing its capacity, the road will become busier with vehicles undertaking long-distance journeys. This phenomenon of induced traffic has been known since 1925 and there have been multiple confirmatory reports since. The then-Department of Transport's Standing Advisory Committee on Trunk Road Assessment took evidence on trunk roads and the generation of traffic and published an authoritative report in 1994. A key conclusion from that report was that increasing road capacity quite extensively induces people to make more and longer trips although the effect varies widely according to the circumstances. The configuration of traffic flows in the Cambridgeshire road network, taking into account the upgraded A14, points to increased capacity at this roundabout increasing long-distance travel on the A142, not to shortened commuter travel times.
- The plans fail to address the climate crisis. The United Nations Intergovernmental Panel on Climate Change (IPCC) 2019 Summary for Policymakers shows that limiting global warming sufficiently to be manageable (1.5°C) requires rapid and far-reaching changes in transport as well as other polluting activities. Carbon dioxide emissions need to fall by 45 percent from 2010 levels by 2030 to achieve the target. In the United Nations Framework Convention on Climate Change Agreement as adopted in December 2015 (the Paris Agreement), the UK government committed to a reduction of 2030 greenhouse emissions by at least 40% compared with 1990. The Cambridgeshire July 2015 Local Transport Plan provided an updated climate change target (LTP 11) of a 34% drop in carbon dioxide emissions from 1990 figures by 2020. This was a target that would be compatible with the IPCC summary but it has not been achieved. Quite the opposite. The proposed roundabout plans focus entirely on increasing capacity for motor vehicle movements and therefore more pollution, including carbon dioxide emissions, for many years to come. Note that the NPPF requires that planning decisions reflect relevant international obligations.
- The LTP has an objective of reducing emissions to 'net zero' by 2050 to minimise the impact of transport and travel on climate change. Increasing motor vehicle capacity with schemes like these plans make even this objective more of a challenge, and doing the minimum now and coming back later to do it better will almost certainly cause more environmental damage than doing it once, properly.
- According to paragraph 7.22 of the Lancaster Way Site Wide Travel Plan (October 2010), a Section 106 Agreement requires provision of pedestrian and cyclist crossings of both the A142 and the A10.

In conclusion, we object to the proposed plans, which clearly make the pedestrian and cycle crossing of the A142 near the Lancaster Way roundabout both more intimidating and more dangerous. There are many regulations and manuals that require that pedestrian and cyclist crossings not be degraded and there is every reason to believe that if the crossings were improved that congestion on the road would be lessened by enabling a modal shift to active travel, including EAPCs, and possibly e-scooters.

Increased motor vehicle capacity will not help with congestion for long. The proposed plans will exacerbate pollution and run counter to climate change mitigation efforts. Finally, we note that the Lancaster Way Business Park developer has a Section 106 commitment to fund a pedestrian and cyclist crossing of the A142.

Yours sincerely,
On behalf of the Ely Cycling Campaign and Camcycle

John Powell
Matthew Danish