Basildon Air Quality Management Plan – E	East Mayne scheme public notice period objections and responses

Objection	Response
I responded to your initial consultation to this proposal and	The ministerial directive from Government specifically outlines the need
now reiterate my main comments again as part of the	for us to resolve air quality exceedances on East Mayne, Basildon, in the
amended proposal. They do not appear to have been taken	shortest possible time. Having assessed various options, we believe the
into consideration in your summary feedback from the first	relocation of the pedestrian and cyclist route away from the central
consultation.	reservation is the most proportionate way of achieving compliance in the
	area and in the shortest possible time, as required by law.
Whilst I have no objections to these proposals in principle,	
and moving people away from poor air quality is to be	The Government's benchmark position for areas that exceed legal air
welcomed, that is all this does, move people away.	quality limits at the roadside like this is a charging clean air zone, which
	charge certain vehicle owners for driving in a specified zone if their
The proposals do not address the root causes in any obvious	vehicle fails to meet certain emissions standards. Our studies concluded
way. The poor air quality will continue to exist and that is	that a charging clean air zone would take longer to implement than our
clearly bad for the environment and people's health.	preferred option, while we also think it would have a disproportionate
	impact on businesses and residents.
I think most people would prefer to see measures to reduce	
the effects on poor air quality. This is particularly relevant	Although we recognise the wider need to reduce travel demand through
when this matter is considered in conjunction with the	providing safer, greener and healthier alternatives to driving and are
emerging Basildon Local Plan (2014-34) that is awaiting an	doing so through a number of other schemes and initiatives, we do not
examination in public.	believe this can be done in a proportionate or quick enough way as part
	of this particular project.
In that Local Plan, Basildon Council is proposing large scale	
housing and commercial development that will inevitably use	While we acknowledge the comments made about development and the
the A127/A132 interchange on a daily basis. This	need for wider improvements to the A132/A127, these are outside the
development will put a significant amount of additional traffic	scope of this project. We will, however, continue to work with Basildon
on the wider road system in that area.	Borough Council and other partners separately on these matters.
However, Basilden Council has retrospectively asked the	
However, Basildon Council has retrospectively asked the Planning Inspector to consider a change to the submitted	
Local Plan that will have a direct effect on the matters being	
considered under this proposal for the A132 East Mayne.	

In the submitted Local Plan, as subjected to several public consultations and with input and modelling from Essex Highways, Basildon Council proposed a new grade separated junction on the A127 at its intersection with Cranfield Park Lane and Pound Lane to support the development being proposed to the north and south respectively. Subsequently, Basildon Council has proposed that this new junction is no longer required following concerns over air quality on the A127 and is proposing smaller junction mitigation measures. Essex Highways has been involved in this too.	
To the layman this does not look like joined up thinking. The proposed development remains in the Local Plan and if that is not to be served by a new junction on the A127 it is inevitable that the extra traffic created will go through the A127/A132 junction instead, adding to the already known air quality problems in that area. I would strongly urge Essex Highways to take a step back and look at this whole matter from all perspectives as it feels very piecemeal just now. With the Planning Inspector's examination hearings expected to start soon on the Basildon Local Plan these matters are likely to become very visible	
and subject to further scrutiny. I write to Object to the Traffic Regulation Order TRAF/7550 which will increase vehicular emissions and thereby lead to increased vehicular pollution on East Mayne and pollution related fatalities in Basildon generally. The TRO:	Essex County Council and Basildon Borough Council were directed to establish what measures would be needed to bring air quality in East Mayne to within legal limits in the shortest possible time. Computer modelling confirmed that if no further action was taken then compliance in East Mayne was not likely to occur until 2024 and, therefore, Essex County Council and Basildon Borough Council have a legal obligation to make it compliant sooner.

Provides an additional set of traffic signals on the	The Government's benchmark position for areas that exceed legal air
northbound carriageway of East Mayne. This will lead t	
additional stops and starts by vehicles.	charge certain vehicle owners for driving in a specified zone if their
Makes walking and cycling through this area more	vehicle fails to meet certain emissions standards. Our studies concluded
hazardous and more time consuming by enforcing up to	
three additional carriageway crossings by pedestrians	preferred option, while we also think it would have a disproportionate
and cyclists, so disincentivising walking and cycling. Th	impact on businesses and residents.
will lead to increased use of motor vehicles.	
 Will consequently lead to a greater number of vehicular 	Having assessed various options, we believe the relocation of the
journeys making a greater number of stops and starts,	pedestrian and cyclist route away from the central reservation is the most
leading to an overall increase in vehicular emissions.	proportionate and practical way of achieving compliance in the area and
	in the shortest possible time, as required by law.
In setting out the reason for the TRO it is stated in the Esse	
Highways submission that "The councils were also instruct	providing safer, greener and healthier alternatives to driving and are
[by Government] to carry out further analysis to establish what measures would be needed to bring air quality to with	
legal levels as soon as possible on East Mayne (A132)".	believe this can be achieved in a proportionate or quick enough way as
However as noted in the three bullet points above the	part of this particular project, where compliance must be achieved in the
scheme will actually lead to an increase in emissions. "Leg	
levels" are only claimed by presumably removing a	
monitoring point on the pedestrian/ cycle route.	We acknowledge that our proposals would cause inconvenience to some
	pedestrians and cyclists, particularly those travelling between the east
Pedestrians and cyclists will still have to use the central	side of East Mayne and the Nevendon junction, and would increase their
reservation, in order to cross the two separate carriageway	journey times. However, crucially, the scheme would reduce people's
of East Mayne. This, and the two further carriageway	exposure to air pollution in the worst affected section of the central
crossings, will mean that their time exposure within the	reservation and removes the air quality receptor location where an
overall corridor is greater than at present. Of course neithe	
does it remove them from the central reservation because	the crossing facilities for those travelling south or on the east-west route.
they need to cross East Mayne.	Following comments received during the public engagement period about
	the increased journey times and number of crossing points for
The Essex Highways submission does not acknowledge th	at pedestrians and cyclists, potential future mitigation measures have also
emissions will increase. What it does is state that it	been investigated, as set out in the options appraisal report, and are
will "reduce people's exposure" to these [greater] emission	
"in the worst affected area". These 'people' are the	changes have been made to the scheme to widen parts of the proposed crossing route.
pedestrians and cyclists using the route along East Mayne	

 small number of people, who will actually be forced to spend longer in the East Mayne corridor). All other people will suffer an increase in emissions. Now the Essex Highway submission states that "In Basildon, almost 6% of all deaths (people aged over 30) each year can be attributed to air pollution". So all these other people, contributing to the 6% of all deaths, will suffer more because of the scheme. The TRO should therefore be rejected. It will lead to an overall increase in vehicular emissions and consequently an increase in the "almost 6% of all deaths" in Basildon "that can be attributed to air pollution". It will also increase pedestrians' and cyclists' time exposure to emissions in the East Mayne corridor. The proposed scheme should be scrapped and replaced by one that reduces emissions for everyone in Basildon, not one that increases emissions. 	Our traffic modelling work shows that, without action, delay and congestion in the area is set to continue in the peak and inter-peak periods by 2022 due to increases in traffic. This would lead to a continuation of the air quality problems. In devising our scheme, which removes the need for pedestrians and cyclists to cross at the point of highest air quality pollution, we considered several configurations of signals. The chosen scheme is considered to provide the best configuration, on balance, with delays on some turning movements offset by improvements in other turning movements. It is recognised that the priority of keeping traffic moving on East Mayne has been balanced with a slight increase in queues on Christopher Martin Road, due to the introduction of a new crossing. However, traffic queues would be monitored as part of the air quality monitoring plan. Consequently, there would be opportunity to review signal timings and respond to any queuing or delay. This project is a very difficult balancing act, but doing nothing is not an option and, ultimately, we must address the air quality exceedances as soon as possible, as required by law.
I'm writing about the proposed new crossings at East Mayne /	Essex County Council and Basildon Borough Council were directed to
Christopher Martin Road Basildon (Ref: TRAF/7550).	establish what measures would be needed to bring air quality in East
It does seem absurd that the number of crossings required by	Mayne to within legal limits in the shortest possible time. Computer
pedestrians and cyclists to travel from Sainsburys to Wickford	modelling confirmed that if no further action was taken then compliance
is increasing from 4 to 7, at a time when the government is	in East Mayne was not likely to occur until 2024 and, therefore, Essex
encouraging active travel for health, pollution reduction, and	County Council and Basildon Borough Council have a legal obligation to
tackling congestion. These measures make it even less likely	make it compliant sooner.
that people will want to use a bike or walk for their journey	The Government's benchmark position for areas that exceed legal air
between Basildon and Wickford.	quality limits at the roadside like this is a charging clean air zone, which
In addition, the extra time that will be spent waiting at these	charge certain vehicle owners for driving in a specified zone if their
crossings must surely negate the benefit gained by moving	vehicle fails to meet certain emissions standards. Our studies concluded
the path from the centre of the carriageway to the edge of the	that a charging clean air zone would take longer to implement than our

road. The exposure to pollution must still be significant for users on the new route at the side of the road, but now they will have to remain in the area for a longer duration waiting	preferred option, while we also think it would have a disproportionate impact on businesses and residents.
will have to remain in the area for a longer duration waiting for 7 sets of lights to turn green. The solution to the overall pollution problem at this junction is surely to reduce car use, particularly for short journeys that could be cycled or walked. Making the link between Basildon and Wickford, two of the most important centres in the borough, more difficult for people on bikes and those walking seems to go directly against that aim, thereby worsening the problem.	Although we recognise the wider need to reduce travel demand through providing safer, greener and healthier alternatives to driving and are doing so through a number of other schemes and initiatives, we do not believe this can be achieved in a proportionate or quick enough way as part of this particular project, where compliance must be achieved in the shortest possible time. Having assessed various options, we believe the relocation of the pedestrian and cyclist route away from the central reservation is the most proportionate and practical way of achieving compliance in the area and in the shortest possible time, as required by law. We acknowledge that our proposals would cause inconvenience to some pedestrians and cyclists, particularly those travelling between the east side of East Mayne and the Nevendon junction, and would increase their journey times. However, crucially, the scheme would reduce people's exposure to air pollution in the worst affected section of the central reservation and removes the air quality receptor location where an exceedance occurs. It should be noted that the scheme would improve the crossing facilities for those travelling south or on the east-west route. Following comments received during the public engagement period about the increased journey times and number of crossing points for pedestrians and cyclists, potential future mitigation measures have also been investigated, as set out in the options appraisal report, and are being considered separately from this scheme. In addition, design changes have also been made to the scheme to widen parts of the proposed crossing route.