

Written Representation, registration identification number 20035447.

Cycling UK's Cycle Advocacy Network (CAN) brings together people with a shared interest in creating the conditions that enable more people to cycle, including better infrastructure for cycling and safer roads.

This written representation will focus on the routes and facilities included within the Lower Thames Crossing scheme to provide for people who wish to cycle for their short everyday journeys and longer trips. It will be limited to routes and facilities south of the river Thames. For the purposes of the examination all other matters should be viewed as areas of agreement.

The design principles for cycle routes and facilities are set out in "Design Manual for Roads and Bridges CD 195 - Designing for cycle traffic" and "Cycle infrastructure design (LTN 1/20)". Both call for designs that provide Coherence, Directness, Comfort, Attractiveness and Safety.

Areas of disagreement detailed below centre upon a failure by Highways England to apply those design principles in the scheme.

Provision of facilities for people who cycle to use the new tunnels to cross the Thames

Highways England have made no provision for people who cycle and other non-motorised users to use the new tunnels to cross the Thames. The scheme understandably prohibits people who cycle from using the carriageway. Highways England have decided against mitigation by way of a shuttle bus service similar to that at the existing Dartford crossing, referring to the existing Gravesend-Tilbury ferry crossing as adequate alternative provision.

The ferry does not run on Sunday, nor does it offer a 24/7 service. There has been no proposal to increase the hours of operation of the ferry. There has been no proposal to improve access to the ferry crossing.

The ferry does not provide adequate mitigation. Highways England should provide a 24/7 shuttle service for non-motorised users wishing to use the tunnels.

Failing to provide for people who wish to cycle where new cycle route networks cross HS1 on overbridges adjacent to the Marling Cross Hares Bridge, Henhurst Road and Brewers Road

Highways England designs do not provide a coherent cycle network at these locations. The existing crossing of HS1 adjacent to the Hares Bridge crossing of the A2 west of Marling Cross is to footpath standard. Highways England propose to improve the approaches to the HS1 overbridge but do not propose to upgrade the crossing itself, indicating that cyclists should “dismount”.

Henhurst Road is the most direct route between Marling Cross and Jeskyns Community Woodland. The proposed cycle network does not seek to provide this direct connection despite there being adequate space on the existing Henhurst Road HS1 overbridge.

At Brewers Road the cycle facilities to be delivered as part of the new green bridge across the A2 stop where it meets HS1 and new cycle facilities restart immediately south of the existing HS1 overbridge. The proposal is that cyclists should dismount and continue on the footway.

In all of these examples the provisions for people who cycle lack coherence. Safety would undoubtedly be enhanced by separating cycle traffic from motor vehicles on Henhurst Road and Directness improved.

The crossing of HS1 adjacent to the Hares Bridge crossing of the A2 west of Marling Cross should either be upgraded to safely accommodate shared pedestrian and cycle use or a new structure exclusively for cycles should be provided adjacent to the existing overbridge.

A separated cycleway and footway adjacent to Henhurst Road should be created to link the proposed cycle facilities at the Henhurst Road roundabout with Jeskyns Community Woodland.

Recent work to develop a Local Cycling and Walking Infrastructure Plan for Gravesham Borough Council has identified Brewers Road as a significant corridor for cycle movements. The cycle facilities on Brewers Road should be connected across HS1, either by widening of the existing footway or repurposing a lane of the carriageway with the addition of tidal-flow traffic light control to the remaining lane.

The dedication of many new and improved cycle routes as bridleways or permissive paths, whilst providing negligible information on proposed widths, surface materials, drainage, lighting and ongoing maintenance of such routes within the DCO application.

The lack of information on access controls, widths, surface materials, drainage and lighting makes it impossible to understand how these cycle routes will meet the criteria of Comfort, Attractiveness and Safety. Designations of bridleway or permissive path rather than Cycletrack are being sought for many new routes.

Bridleways raise concerns over accessibility. Both CD195 and LTN1/20 make reference to the Cycle Design Vehicle in order that cycle facilities are designed to accommodate a variety of non-standard cycles that also serve as their users' mobility aids. All routes must be accessible to users of the Cycle Design Vehicle.

The “Countryside Act 1968, section 30, Riding of pedal bicycles on bridleways (1)” specifically restricts those rights to bicycles, excluding users of many examples of the Cycle Design Vehicle from the use of such routes by right. Further “Countryside Act 1968, section 30, Riding of pedal bicycles on bridleways (3)” states there is no obligation to maintain a bridleway to a condition that can be used by people riding bicycles.

The creation of permissive paths leaves open the possibility of withdrawal of permission to use routes at a future date and offers no security of ongoing maintenance. It places the ongoing Coherence of the cycle network at risk.

Given that designations of bridleway or permissive path rather than Cycletrack are being sought, it seems reasonable to infer that Highways England are working to the lowest possible standards with regard to surfaces, drainage and lighting, rather than those befitting a Nationally Significant Infrastructure Project. This will impact the Comfort, Attractiveness and Safety of routes.

The minimum designation for cycle facilities within the scheme should be Cycletrack, with the attendant legislative requirements for their design and future maintenance.

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