

CAMCYCLE



Cambridge Cycling Campaign

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Jim O'Sullivan
Chief Executive, Highways England
1 Walnut Tree Close
Guildford GU1 4LZ

Re: CD 195 Designing for cycle traffic – CEO 21455076

January 20, 2020

Dear Mr O'Sullivan,

The reason we have raised this issue with Mr Zeichner and written to you is that Highways England has been designing junctions and crossings that are extremely difficult and dangerous to use, whether you are walking, cycling or riding a horse.

You claim that the crossings have been designed "*to ensure an inclusive level of provision for all users*", however the finished product is clearly not usable by all ages and abilities. We have parents writing to us with concern for the safety of their children on the junctions and crossings designed and built by Highways England. The distances to cross and speeds of motor traffic are such that any vulnerable user who moves slowly will be at substantial risk of serious injury when trying to use your infrastructure. Mr Bray has written that "*using tighter radii risks vehicle overrun and damage to the crossing facility, which would become a maintenance concern.*" We are alarmed that your organisation takes the view that the safety of people trying to use your pathways is less important than "*maintenance concerns*".

You claim that TA 90/05 was the guiding document, however we see instances where TA 90/05 and the related documents TD 42/95 and TA 91/05 were not followed even at recently finished junctions within the A14 project. For example, statements "*Approaches to crossings should normally be at right angles to the carriageway*" (TA 90/05, paragraph 9.6), "*Changes in horizontal alignment should normally be via simple circular curves*" (TA 90/05, paragraph 4.2) and "*it is important to consider the provision of facilities that take cyclists away from the mouth of the junction*" (TD 42/95, paragraph 5.5) seem to be routinely ignored. It is true that TA 90/05 and its related documents had many flaws and they needed updates. For example, they do not cover one of the most important topics for safety: minimising the distance necessary to cross the carriageway and therefore the time spent in danger. CD 195 does attempt to address this point, albeit imperfectly. CD 143 does not cover it, despite the fact that crossing distance is even more important for the safety of pedestrians and equestrians.

You claim that "*an independent Road Safety Audit was completed to assess the proposed design details*". However, we have learned that Road Safety Audits are often performed by engineers who are not experienced in the design of modern, safe and accessible cycling infrastructure. The net result is that they do not find the problems that ordinary people will face when they try to use the finished schemes. Therefore the Road Safety Audits as currently implemented are not useful tools for protecting people who are cycling on your infrastructure. Please can you advise us whether you expect Road Safety Audits to

consider walking, cycling and horse-riding users? If they are to be covered, please can you advise how you are selecting your auditors for this purpose and what relevant expertise and experience they typically have? If they are not to be covered, please can you explain where the ultimate design responsibility lies?

You claim that you “*have to ensure not just the safety of each category of user but that all users can be safe simultaneously on the same pathway*”. However, designing and building infrastructure that is simultaneously dangerous for walking, dangerous for cycling and dangerous for horse-riding is not an acceptable approach. Your rationale for ignoring the safety standards for cycling is faulty and illogical. A junction or crossing that is dangerous for cyclists is going to be even more dangerous for people walking or riding horses, because they move more slowly. Therefore, ignoring CD 195 means that pathways are dangerous for everyone, especially pedestrians and equestrians. The recently released document CD 143 is supposed to cover walking, cycling and horse-riding together, but it is unfortunately incomplete and does not cover many of the essential issues, such as providing safe crossings at junctions and roundabouts.

When designing pathways that are shared-use you must make them safe for all users. That means following all of the relevant safety standards, and not pitting one group against the others. In essence, we can see that CD 195 outlines a bare minimum of provision for shared-use pathways, which in fact should feature stronger protection for slower-moving users at dangerous points such as crossings and junctions. That means using controlled crossings more often than CD 195 might suggest, or further reducing motor traffic speeds in the vicinity of the crossing or junction. If you claim that the shared-use pathway cannot be provided to these higher standards, then it is necessary to provide segregated provision with dedicated pathways for each type of user following their individual standards.

Nonetheless, if you continue to claim that CD 195 doesn't apply to shared-use pathways because of a curiously pedantic reading of one sentence in one paragraph of the document, then CD 195 loses all value entirely, because all your pathways are shared-use in one form or another. You would never refuse to use a road safety standard because people walk, cycle and ride horses on roads; what makes you think it is reasonable to ignore a cycleway safety standard just because people also walk and ride horses on it?

Please go back to our letter from November 4th and investigate the individual points that we raised, in order to ensure that Highways England can and will deliver infrastructure that is safe for all. For reference, those points are reproduced below. We also add that, since CD 143 was released in the interim, its interaction with CD 195 should be considered and described as part of the following points. The ultimate goal should be understanding why safe cycling infrastructure is not being designed and built, and how to ensure a genuine fix for both past and future projects, so that Highways England projects can become world-class examples of safety, comfort and convenience for walking, cycling and horse-riding users.

- a) Whether and where CD 195 (formerly IAN 195/16), “*Designing for cycle traffic*”, has been applied to the design and implementation of Highways England schemes, and the evidence you have to show this to be the case;
- b) In cases of cycle routes or potential cycle routes where CD 195 was not applied: the reasons why and the result of any safety audits that examined the cycling infrastructure;
- c) The remedial measures that Highways England will implement should it be found that the standard has not been complied with either in design or implementation (or both);
- d) What steps you, as Chief Executive, will undertake to ensure that CD 195 will be applied consistently and fully across the Highways England network to meet the needs of cycle traffic. This includes applying the standard fully without excluding the case of shared-use pathways, an exclusion which severely weakens the document and worsens safety for all road users; and,

e) What steps you will undertake to direct a requirement for independent reviews of the initial, detailed and post-implementation design of all active travel infrastructure associated with planned and recently completed schemes on the Strategic Road Network? What will be done to carry out any necessary improvements in order to provide infrastructure that meets or exceeds Highways England's standards in order to provide safe and effective cycling provision?

Yours sincerely,
On behalf of Camcycle

Matthew Danish,
Trustee

cc: Mr Daniel Zeichner MP, Member for Cambridge.
Ms Lilian Greenwood MP, Member for Nottingham South

