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Chris Heaton-Harris MP,
Minister of State for Transport,
Department for Transport,
Great Minster House,
33 Horseferry Road,
London
SW1P 4DR

Thursday 4th March 2021

Dear Minister,

There is concern in West Sussex over unsafe designs put forward by Highways England to modify a section of the South Coast National Cycle Route (No2).

The plans do not comply with DfT LTN1/20 safety guidelines for cycle infrastructure, particularly where it is intended to convert approximately 4km of urban pavement into a two way shared use cycle track. Insufficient visibility at many of the 150 junctions and driveways crossing the pavement will endanger anyone riding this popular route.

There are also issues with equality as elderly, disabled and visually impaired pedestrians will feel threatened by sharing the pavement with busy two way cycle traffic.

Our specific concerns are listed on the second page of this letter.

Please contact Jim O'Sullivan of Highways England about this scheme and encourage compliance with DfT standards for safety at the junctions and driveways.

The current Gear Change plan for cycling and walking in England promises to regulate the quality of infrastructure through the new body Active Travel England.

Please confirm if Active Travel England will be able to enforce minimum standards for walking and cycling on this project?

Yours sincerely,

Geoff Farrell (Chair of West Sussex Cycle Forum) geofffarrell@btinternet.com

Andrew Gould (Secretary of Chichester and District Cycle Forum) andrewgould97@hotmail.com

Mark Record (Secretary of ChiCycle) recordm@btinternet.com

Contact Details for Highways England/WSCC Chichester to Emsworth Non-Motorised User scheme

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Specific Concerns over the Highways England/WSCC Chichester to Emsworth Non-Motorised User scheme

- Splay visibility criteria set out in Manual for Streets 2 and in LTN1/20 section 5.8.2 requires road users to have adequate visibility of approaching traffic at junctions and access-ways. However motorists will be unable to safely see approaching traffic if the pavements are converted to cycle tracks. Many driveways and junctions are bounded on both sides by mature hedges, fences, walls and buildings. If the position where motor-vehicles give way is moved back at junctions and access-ways to make allowance for the cycle track, motorists will only be able to pull out onto the A259 with severely limited visibility of approaching traffic.
- LTN1/20 section 10.5.24 explains for cycle tracks not set back from the road, it is only appropriate to give priority to cyclists at junctions and access-ways where the cycle traffic is one way. The Chichester to Emsworth Non-Motorised User scheme is intended to put two way cycle traffic onto pavements running on only a single side of the A259. These pavements are intersected by over 150 side roads and driveways. It is unsafe to give two way cycle traffic priority over motor-vehicles at these crossings but unrealistic to expect cyclists to give-way/stop at every location where vehicles cross the pavement.
- England's cycling and walking policy Gear Change and LTN1/20 section 1.6 summary principle No-2 clearly state that cyclists **must** be segregated from pedestrians on urban streets. The scheme mainly consists of plans to convert 4 km of urban pavement into shared use cycle tracks. The pavements planned for conversion run through the heart of the villages of Nutbourne, Bosham, Fishbourne, Hermitage, Chidham, Southbourne, Prinsted and the town of Emsworth. The final summary principal No-22 (*when to break these principles*) does permit exceptions but only "In **rare** cases, where it is absolutely unavoidable, a **short** stretch of less good provision rather than jettison an entire route which is otherwise good". It is unreasonable to describe 4 km of shared pavement as only a short stretch.
- LTN1/20 6.5.4 states "Shared use facilities are generally not favoured by either pedestrians or cyclists, particularly when flows are high. It can create particular difficulties for visually impaired people...".

For your convenience we are also sending an electronic copy of this correspondence to your email chris.heatonharris@dft.gov.uk