

### **ChiCycle**

Campaigning for better walking and cycling in and around Chichester

# ChiCycle Objection to Planning Application 22/01485/OUTEIA Phase-2 of the West of Chichester Development (Part 2)

ChiCycle object on grounds that the proposed parallel crossings fail to follow appropriate guidance from the DFT Traffic Signs Manual.

There are three key areas where the proposed crossings and their adjacent crossing controlled areas deviate significantly from DFT Traffic Signs Manual guidance:

- The designs show the proposed parallel crossings will permit two way cycle traffic.
  The Traffic Signs Manual minimum recommended width for two way cycle crossings
  is 3 metres. However the cycle crossings shown on the plans are approximately half
  the DfT 3 metre minimum width for two way cycle traffic.
- Zig-zag and terminal lines mark crossing controlled areas associated with Zebra and Parallel crossings. Their standard distance from the edge of the carriageway is 250 mm but this may be increased to a maximum of 2 m to allow cyclists to ride between the kerb and the zig-zag markings. However the crossing control zig-zag lines shown in the proposals, confusingly bulge in and out from the edge of the kerb unlike anything advised within the Traffic Signs Manual.
- DfT Traffic Signs Manual permit only limited types of road marking symbols to be used within crossing controlled areas. However several kinds of symbols are shown in the proposed crossing controlled areas whose use is forbidden.

The following pages detail the proposed plans deviation from DFT Traffic Signs Manual guidelines.



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PO19 3LJ 04th September 2022

## The Proposed Cycle Crossings are approximately Half the Minimum Width recommended for Two-Way Cycle Traffic

The DfT Traffic Signs Manual Chapter 6 paragraph 17.2.6 states:

17.2.6. ... Where the cycle route is **two-way** the minimum width should be **3 m**...

ChiCycle previously highlighted non-compliance of proposed cycle crossings in similar locations. We objected before WSCC granted advance permission for sub standard infrastructure through the issuing of (TRO) CHS9038RC.

WSCC highways officers incorrectly advised that the highway code requires users of shared pavements to navigate roundabouts in a clockwise direction only. Although the Highway Code does require cyclists riding in the carriageway to navigate roundabouts in a clockwise direction, there is no such restriction for users of shared pavements. However this faulty reasoning is still mistakenly used by officers to advise for acceptance of these inappropriately narrow cycle crossings.

As residents correctly anticipated, current proposals include the complete removal of the existing mini roundabout at Westgate/Sherborne-Rd and its replacement with a staggered junction. Therefore, WSCC officer's doubtful claims about Highway Code rules regarding shared use paths in proximity to roundabouts, are now clearly irrelevant. The cycle crossings must be 3 metres wide to comply with DfT guidelines

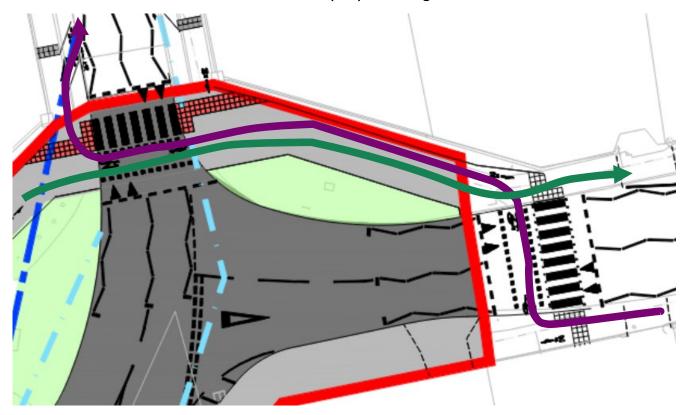
Indeed, Appendic C – CHS9038 show WSCC officers acknowledged the proposed cycle crossings are significantly below 3 metre width (the DfT minimum width for two way cycle crossing is 3 metres) but incorrectly advised this complies with the Traffic Signs Manual:

The WSCC response to objection No6 Appendix C - CHS9038 states:

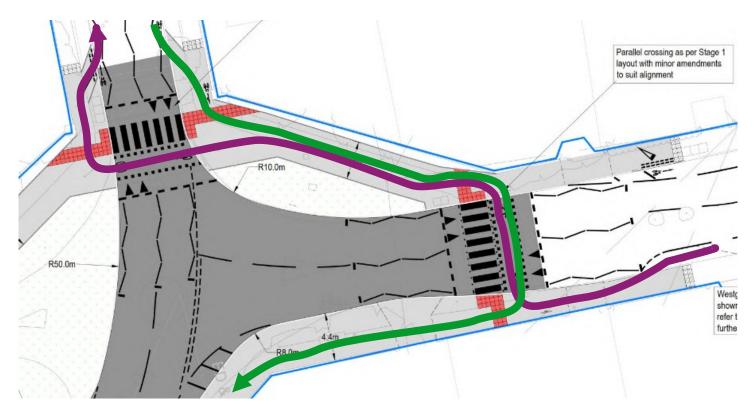
The width of pedestrian crossing is 2.4m on the Sherborne Road arm, whilst that for the cyclists is 1.8m. The Zebra crossing located west of the mini roundabout is 3.2m wide, which complies with guidance in Traffic Signs Manual Chapter 6.

ChiCycle fear WSCC highways officers will continue to mislead councillors that narrow cycle crossings should cater only for one way traffic. The diagrams on the following three pages illustrate how users of the share use pavements would reasonably use the proposed crossings travelling in either direction.

The diagram below shows part of the proposed junction between Westgate and Sherborne Rd. It is reasonable to expect cyclists to use the proposed parallel crossing on Sherborne Rd in either direction. The purple and green lines show valid routes.

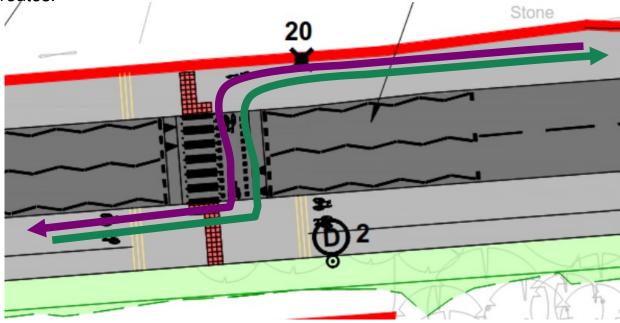


It is equally reasonable to expect cyclists to use the proposed parallel crossing on Westgate to travel in either direction. The purple and green lines show valid routes in this  $2^{nd}$  example.

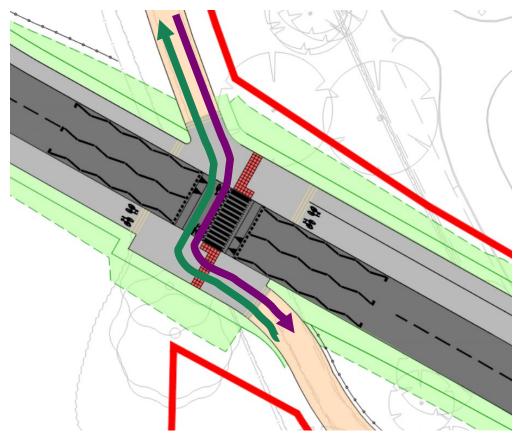


The proposed crossing to the immediate West of the junction between Westgate and Sherborne Rd is shown below. Again, it is reasonable to expect cyclists to use the proposed parallel crossing to travel in either direction. The purple and green lines show

valid routes.

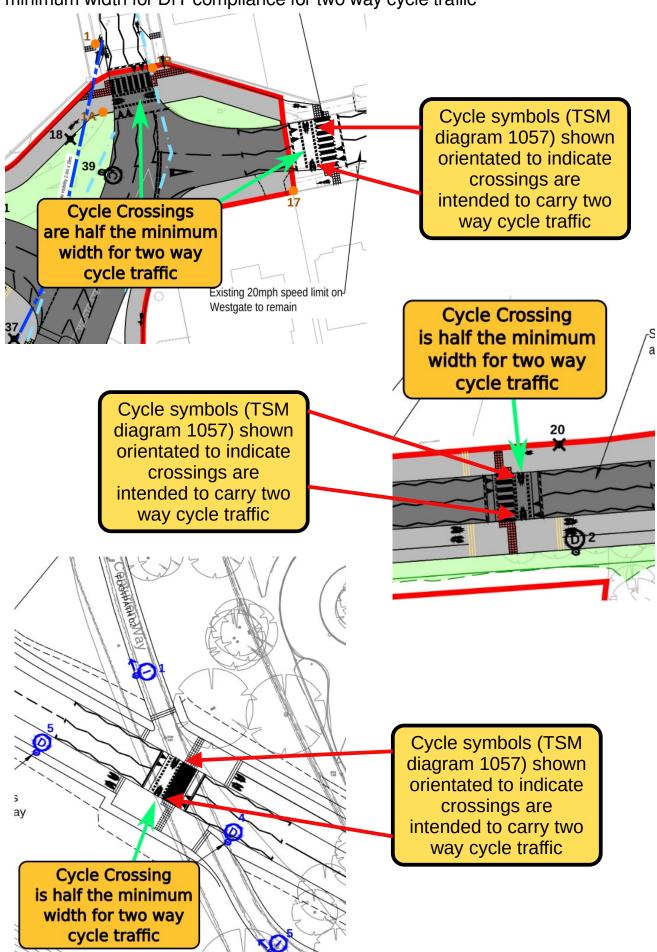


The proposed Southern Access Road crosses Centurion way as shown in the diagram below. It is reasonable to expect cyclists to use this crossing in both directions.



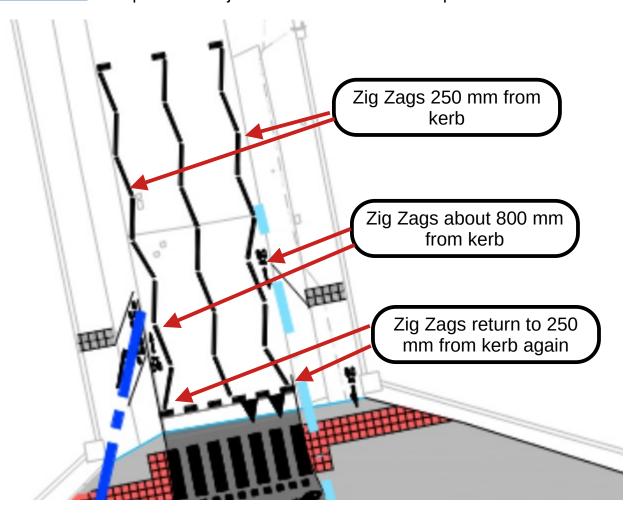
If implemented, all the proposed crossings will be used by cyclists travelling in either direction (two way traffic). However, the proposals clearly do not the meet the recommended minimum 3 metre width for two way cycle crossings.

The following diagrams illustrate the cycle crossings are approximately half the minimum width for DfT compliance for two way cycle traffic



#### Zig Zag Lines Marking Crossing Controlled Areas Fail To Follow The Recommended Geometry Set Out In The DfT Traffic Signs Manual

This proposed element of highway design is of such poor quality, ChiCycle doubt there has been adequate guidance and supervision in the drawing office. ChiCycle previously <u>objected</u> to this element of poor quality design when it was first included in (TRO) CHS9038RC. Our previous objection has received no response.



Nothing within the DfT Traffic Signs Manual suggests the zig zag line markings can meander away from the carriageway edge to allow inclusion of confusing (and forbidden) road markings close to the kerb. Normally, zig zag lines follow a precise geometric formula for placement leaving them 250mm from the edge of the carriageway. A recent addition to DfT guidance allows zig zag lines to be inset at a constant distance between 1.5 metres (minimum cycle lane width from LTN1/20) and 2 metres (maximum according to Traffic Signs Manual volume 6 paragraph 15.8.1). In this case they signify that a cycle lane runs behind them and runs across the zebra or parallel crossing. No other geometry is permitted by the DfT.

ChiCycle fail to understand why repeated community objections over this confusing and dangerous element of highway design continue to be ignored. It is our understanding that national government advice on road safety should be considered by local highways authorities whenever schemes for new housing developments are put forwards.

Traffic Signs Manual Chapter 6 Figure 15-2 shows the permitted road marking layout for zig-zag markings to be offset from the edge of the carriageway to allow a cycle lane to run behind them. This is the only permitted arrangement where zig-zag markings can be inset from the edge of the carriageway in this way:

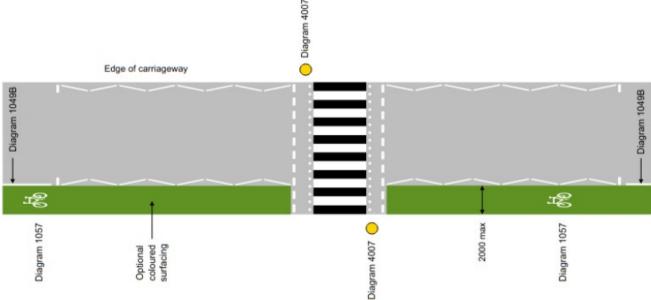
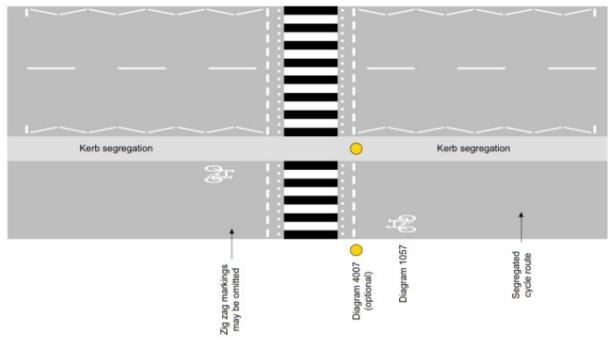


Figure 15-1 Diagram shows road marking layout for a Zebra crossing across both general traffic lanes and an adjacent cycle track. Please note, it is clearly not advised to have the zig zag markings bulge out and back in again to allow inclusion of confusing (and forbidden) road markings close to the kerb:



### Forbidden Symbols are used Within The Proposed Crossing controlled areas

The DfT Traffic Signs Manual Chapter 6 paragraph 15.7.7. gives extremely clear guidance on what road markings are permitted in crossing controlled areas:

15.7.7. The definition of a controlled area in Schedule 1 permits only signs or markings to diagrams 610, 611, 612, 613, 616, 810, 1029, 1057 or 1062, and those indicating the crossing (including hatched or chevron markings in the centre of the road), to be placed within a controlled area. **No other signs or markings must be placed within the controlled area**. For example, cycle and bus lane markings must be discontinued, although coloured surfacing may be used.

However the following symbol (TSM Diagram 1059) is shown within proposed crossing controlled areas in planning application 22/01485/OUTEIA:

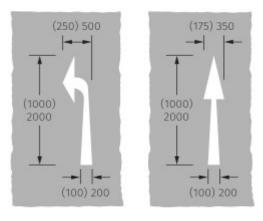


Diagram 1059

Figure 16-9

Traffic Signs Manual Diagram 1059 is clearly not listed amongst permitted symbols and is therefore forbidden from use in crossing controlled areas. In other words, DfT guidance provided from the Traffic Signs Manual Chapter 6 says this symbol must not be placed within a crossing controlled area!

Traffic Signs Manual Chapter 6 paragraphs 15.8.16. and 15.8.16. give further details of what road markings are permitted in crossing controlled areas.

15.8.16. Markings to diagrams 1029 (S11-4-18) and 1062 (S11-4-33) may be used at or near a crossing. The use of diagram 1062 is described in Chapter 5.

15.8.17. No other marking may be used within the controlled area, except hatched and chevron markings in the circumstances described in 15.8.4 and the cycle symbol to diagram 1057 where the zig-zags are off-set from the kerb to allow cycling.

Hatched, chevron or edge of carriageway markings are also not permitted between the outside carriageway kerbs and the outer zig zag lines that mark out crossing controlled areas.

The DfT Traffic Signs Manual Chapter 6 paragraph 15.8.17. explains hatched or chevron markings (diagram 1040) may only be used in the circumstances described in 15.8.4. These combined paragraphs therefore instruct that hatched or chevron markings are only permitted between a central double row of zig-zags in a strictly limited set of circumstances:

- 15.8.17. No other marking may be used within the controlled area, **except hatched and chevron markings in the circumstances described in 15.8.4** and the cycle symbol to diagram 1057 where the zig-zags are off-set from the kerb to allow cycling.
- 15.8.4. The Regulations permit the use of central hatched or chevron markings within the controlled area of crossings. Such markings may be used between a central double row of zig-zags, but only in the following circumstances:
- a) diagram 1040 may be used on the **approach to a central reservation** (including pedestrian refuge) of a single crossing in a two-way road, and diagram 1041 in a one-way road, and
- b) diagram 1040.2 must be used on the approach to a staggered crossing

Therefore, at a crossing controlled area, hatched or chevron markings are only permitted between a central double row of zig-zags. They are forbidden from use elsewhere including between the outer zig zag markings and kerbs. Indeed, this detail is again reinforced in paragraph 15.8.2:

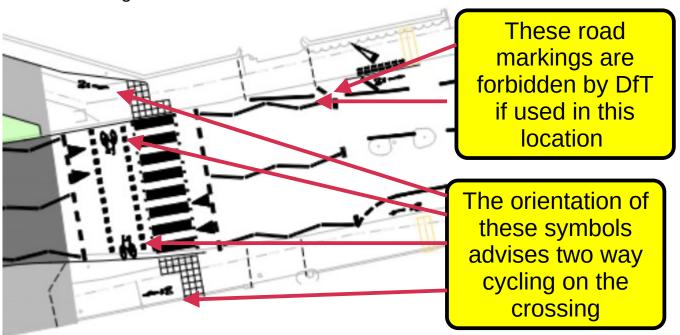
15.8.2. ... Where there is a build out for pedestrians at the crossing point, this should be tapered back to the existing edge of the carriageway; it is not appropriate to use hatched markings to diagram 1040.4.

Residents previously objected to WSCC about hatched or chevron markings being inappropriately used between the proposed outer zig zag markings and kerbs. Appendic C – CHS9038 answer to comment No-2 (Resident of Walnut Avenue) Point-5 the WSCC director of highways & transport gave the following response:

On the western arm of the mini roundabout, hatched road marking have been provided to segregate cyclists from motorists. The same arrangement exists on the Westgate arm. Such layouts are common in West Sussex when cycleways parallel to the carriageway end and cyclists re-join the carriageway. These have performed satisfactorily.

It is an interesting admission that WSCC regularly ignore DfT guidance by inappropriately applying hatched or chevron markings where this is forbidden at crossing controlled areas. ChiCycle's experience is that much of West Sussex walking and cycling infrastructure performs poorly. ChiCycle remain unconvinced the proposed non-DfT-compliant road layout will "perform satisfactorily".

The following diagram of the proposed parallel crossing at the immediate east of the Westgate/Sherborne-Rd junction show use of forbidden hatching and line markings within a crossing controlled area.



For comparison, parallel crossing designs used for a Dutch style roundabout in Cambridge are shown in the diagram below. As can be seen, forbidden symbols such as arrows and cross hatching are avoided between the zig-zag lines and the edge of the carriageways. This example follows DfT Traffic Signs Manual guidance:



#### **Conclusion**

This document illustrates numerous examples of where DfT Traffic Signs Manual recommendations have not been followed by planning application 22/01485/OUTEIA.

The DfT Traffic Signs Manual is both clear and concise making it hard to argue there can be ambiguity allowing the plans to be reasonably considered compliant with DfT recommendations.

ChiCycle are particularly uncomfortable that the most contentious and non-compliant elements of the proposals have already been granted pre-approval through the issuing of (TRO) CHS9038RC. Indeed, Appendic C – CHS9038 documents 26 private comments/objections opposing these crossings and the associated introduction of shared use pavements.

ChiCycle and the Friends of Centurion Way also objected to these non DfT compliant proposed crossings when they were put forward as part of CHS9038RC. However, these concerns were neither addressed nor responded to by WSCC.

It is unacceptable that developers are now picking and choosing jigsaw pieces of the previous crossing designs from CHS9038RC and applying these out of context to a substantially different staggered junction with the introduction of significant additional traffic from a 1,600 home new housing development.

It is not a credible claim that there was adequate consultation over these crossings when they have only been discussed out of any context with the Souther Access Road whose construction now demands their introduction.

Westgate is a key node for the majority of walking and cycling routes on the western side of Chichester. The area is surrounded by a college, schools, child care crèche, health centre, vets and a scout group. The road carries walking and cycling routes to Centurion Way (NC88), the National South Coast Cycle Way (NC2), Salterns Way and it forms the only realistic walking and cycling route from the city to the local Tesco Supermarket. The planning application's own transport assessment document itself relies heavily on substantial modal shift towards walking and cycling.

Westgate is a heavily used walking and cycling route. Its northern pavement regularly carries over 350 school students in the space of an hour. These crossings must follow DfT minimum recommended standards. Compromise is not acceptable in this location.