ChiCycle

Promoting Safe and Confident Cycling in Chichester & West Sussex

ChiCycle feedback on the B2144 Oving Road, WSCC Walking and Cycling Proposals.

We welcome West Sussex County Council considering the needs of pedestrians and cyclists. However, these proposals fall short of offering safe, convenient or attractive opportunities for active travel. The following sections will outline the shortcomings of the proposals in more detail and recommend appropriate alternative solutions more in keeping with national policies on highway design and walking and cycling.

1) Gear Change (National policy on walking and cycling), LTN1/20 (DfT guidelines on designing infrastructure for cycling), and the DfT Manual for Streets, all recommend reducing speeds and volumes of motor traffic as the ideal approach where there is insufficient room for segregated cycling. This must become the focus of Oving Road interventions to improve walking and cycling opportunities

2) Option 1 proposes shared pavements of a type that national policy explain are unsuitable for urban residential streets. There numerous issues that make this option unsafe for road users.

3) Option 2 offers little or no protection to cyclists. National guidelines highlight that such schemes do little to encourage walking and cycling and should not be funded with public money.

4) Conclusion.

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1) Reducing Motor Vehicle Traffic Volumes and Speed is National Government's Recommended Solution to Improving Walking and Cycling in Situations Like Oving Road

1.1) Between April the 2nd 2022 and June the 2nd 2022, roadworks on Oving Road at its junction with the A27 reduced traffic volumes to well below 2,500 vehicles per day. During most of this period, total traffic daily flows monitored at Oving Rd east of Charles Ave traffic counter remained below 1,500 vehicles per day.

DfT consider these low traffic volumes to be acceptable for mixed cycling on "quiet streets". Where low traffic areas are engineered through transport interventions they are called "Low traffic Neighbourhoods". Details of providing for cyclists on quiet mixed traffic mixed traffic streets and lanes can be found in section 7 of LTN1/20.

While traffic volumes were reduced on Oving Road, there were few (if any) news reports of resulting severe impacts on motor traffic within Chichester. Where the B2144 runs within the city, it is a relatively small residential street. It is undesirable for it to be treated as a main arterial route into the city. Indeed there are ample parallel arterial routes running either side of Oving Road making it unnecessary for through traffic to use the route between the city centre and the A27.

If local authorities are serious about encouraging a modal shift towards active travel while also providing walking and cycling opportunities for new residents in the Shopwhyke Lakes development, reducing traffic volumes and speeds on Oving Road is the only realistic/credible solution.

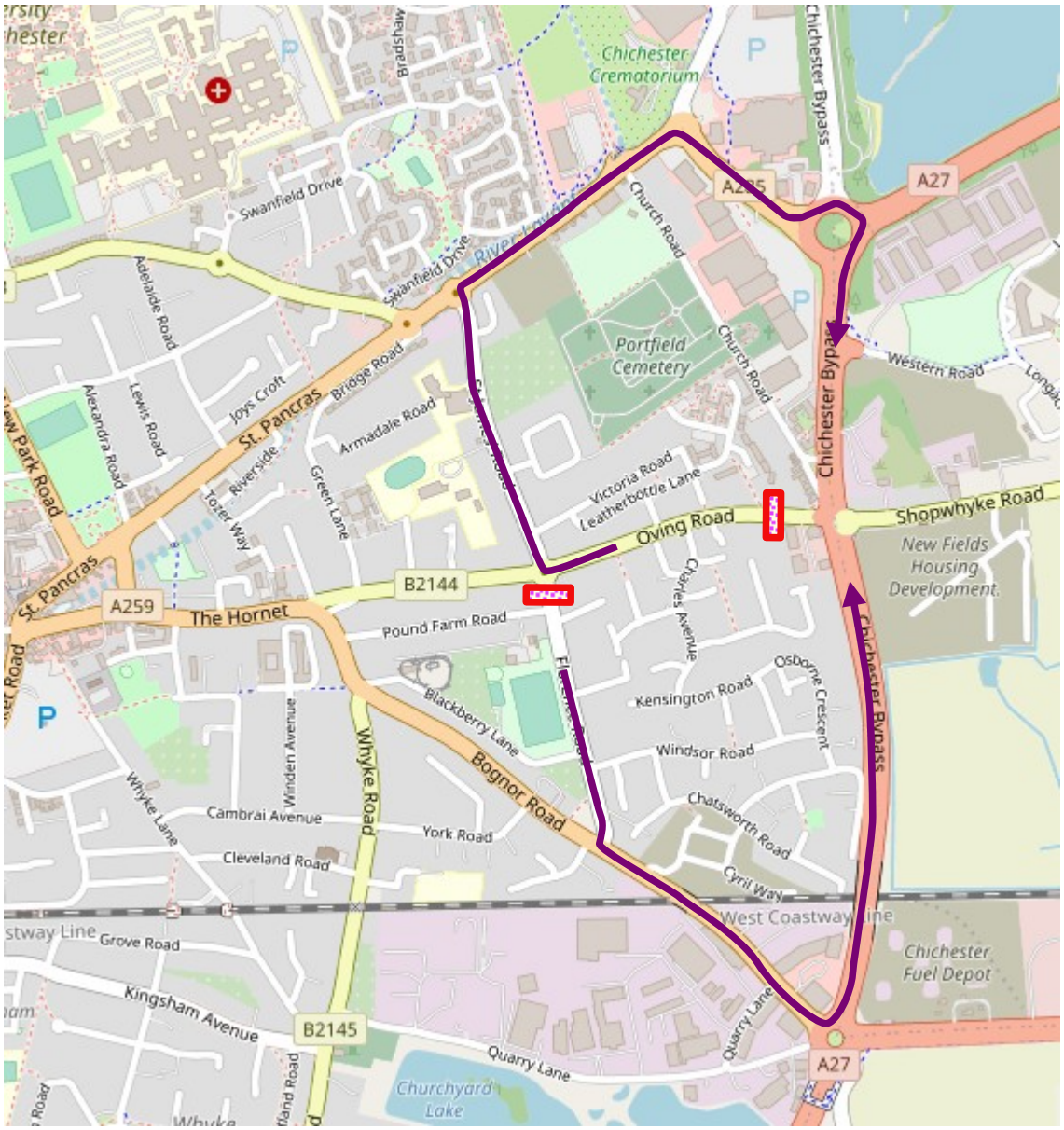
Gear Change (a bold vision for cycling and walking) is the currant national policy for walking and cycling. It makes the following statement on page 17:

> *We will create cycle, bus and walking corridors,* ***closing a limited number of main roads to through traffic except for buses and access****.*
>
> ***A quicker way of providing safe, low-traffic cycling is to close roads to through traffic, usually with simple point closures, such as retractable bollards, or by camera enforcement. This may be useful where the road is too narrow for a separated cycle lane. The closure would only affect through traffic.*** *Residents, visitors, or delivery drivers needing to reach anywhere along the road would still be able to do so – though they might have to approach from a different direction.*
>
> *For example, a small number of routes from key suburbs into a city could become bus and cycling corridors, while the other main roads remained through routes for motorists.* ***Side-street routes, if closed to through traffic to avoid rat-running, can be an alternative to segregated facilities or closures on main roads – but only if they are truly direct****.*

The Dutch have successfully achieved modal shift towards walking and cycling by similarly limiting motor vehicle traffic through sensitive city and residential areas. Dutch transport policies on sustainable transport influence current DfT guidelines and more details of these are available on the link https://crowplatform.com/

1.2 Modal filters are a realistic, cost effective solution that offer genuine benefit to residents, pedestrians and cyclists on Oving Road and the sounding area. This intervention will particularly benefit walking and cycling opportunists for new residents of the Shopwhyke Lakes and New Fields housing developments.

The following diagram outlines the appropriate approach that should be followed according to national guidelines.



Modal Filter blocking private motor vehicle through traffic

Adequate existing route for local traffic onto A27

West Sussex County Council have prioritised provision for active travel in Chichester in their 2022 to 2036 transport plan. In order for the council to deliver their promised priorities, they must at the very least implement solutions that comply with DfT absolute minimum standards.

Option1 & Option2 fail to meet even the very lowest national highway standards. Adequate strategies such as modal filtering that are recommended by DfT must be adopted. Bus gates must be considered if bus routes need to cross modal filters.

1.3 The DfT Manual for Streets guidelines recommend that reduction in traffic speeds and volumes must be the very first option considered when designing or modifying residential streets such as Oving Road.

Option1 and Option2 offer very little towards achieving either objective. Indeed, conversion of the western section of Oving road to one-way traffic flow will achieve the opposite outcome by increasing motor vehicle speeds.

The following table from the Manual for Streets shows the required hierarchy of priorities when designing or modifying streets that carry pedestrians and cyclists:

Oving Road Walking and Cycling Improvements Require Complete Review with these Interventions Considered First

Table 4.1 The hierarchies of provision for pedestrians and cyclists

	Pedestrians	Cyclists
Consider first ↓ **Consider last**	Traffic volume reduction	Traffic volume reduction
	Traffic speed reduction	Traffic speed reduction
	Reallocation of road space to pedestrians	Junction treatment, hazard site treatment, traffic management
	Provision of direct at-grade crossings, improved pedestrian routes on existing desire lines	Cycle tracks away from roads
	New pedestrian alignment or grade separation	Conversion of footways/footpaths to adjacent-* or shared-use routes for pedestrians and cyclists

DfT and Government Guidelines have been Ignored by WSCC Considering only Inappropriate Shared Use Pavements or Ultra Narrow Advisory Cycle Lanes.

DfT Guidelines Now Rule This Option Out Entirely!

1.4) National Policy and DfT LTN1/20 guidelines strongly support the use of cost effective and effective modal filters to create low traffic neighbourhoods

A highly convenient feature of bollards is they can be hinged or retractable so that emergency vehicles and/or buses can still gain access.

Summary Principal No17 shared by both Gear Change (National Policy on Walking and Cycling) and LTN1/20 (DfT guidelines on cycle infrastructure design) is shown below:

> *17. The simplest, cheapest interventions can be the most effective.*
>
> *Perhaps **the single most important tool to promote cycling** may be the humble bollard, used to prevent through traffic. It is relatively inexpensive and can be erected quickly. With a Traffic Order in place to restrict use of the road by motor traffic, **such low-cost modal filters can increase safety by reducing through traffic, while retaining cycle and pedestrian access**. Provided they have real effect, swift, pragmatic interventions are preferred over elaborate and costly ones.*

Bollards used to create modal filter, preventing through traffic
Credit: PJA

ChiCycle feel strongly that public money must always be used wisely. WSCC Options 1 & 2 will be costly to implement but offer extremely little benefit to either road users or the local community.

Much recent progress has been made in national guidelines offering realistic pathways towards carbon neutral transport. These must be adequately considered.

Please implement the appropriate national guidelines for sustainable transport outlined in this first section of ChiCycle's feedback.

2) National policy/guidelines forbid the conversion of busy urban pavements on residential streets to shared use

2.1) Gear Change (a bold vision for cycling and walking) is the currant national policy for walking and cycling. The following statement is made on page 31:

> *Funding only schemes which meet the new standards*
>
> ***We will not fund or part-fund any scheme that does not meet the new standards and principles*** *described in theme 1 and in the Appendix.* ***We will not allow any other agency or body to fund such schemes using any of our money****. This includes schemes delivered through pots such as the Transforming Cities Fund.*

2.2) The shared pavement scheme proposed in Option 1 places cyclists on the pavement where there are blind corners. It directs cyclists across blind driveway exits. There is no buffer strip proposed between parked cars and cyclists on the Pound Farm Lane proposed shared use pavements. Two way cycle traffic is directed across the mouth of junctions at Chequers Place, Charles Avenue.

Summary Principle No2 given in the Gear Change Appendix makes it clear the creation of shared pavements is not permitted on urban streets:

> *2.* ***Cycles must be treated as vehicles and not as pedestrians. On urban streets, cyclists must be physically separated from pedestrians and should not share space with pedestrians. Where cycle routes cross pavements, a physically segregated track should always be provided.***
>
> ***At crossings and junctions, cyclists should not share the space used by pedestrians but should be provided with a separate parallel route.***
>
> ***Shared use routes in streets with high pedestrian or cyclist flows should not be used. Instead, in these sorts of spaces distinct tracks for cyclists should be made, using sloping, pedestrian-friendly kerbs and/or different surfacing.*** *Shared use routes away from streets may be appropriate in locations such as canal towpaths, paths through housing estates, parks and other green spaces, including in cities. Where cycle routes use such paths in built-up areas, you should try to separate them from pedestrians, perhaps with levels or a kerb.*

Routing cyclists around blind corners on pavements and immediately past the entrances to peoples properties will significantly disadvantage vulnerable members of the community in contravention of the 2010 equality act. Indeed, Gear Change Summary Principle No2 contains the following advice:

> ...The ability to deliver a right to cycle requires infrastructure and routes which are accessible to all regardless of age, gender, ethnicity or disability and **does not create hazards for vulnerable pedestrians. Improvements to highways should always seek to enhance accessibility for all.**

2.3) The B2144 Oving Road scheme is titled as “walking and Cycle improvements” but it is well recognised that conversion of pavements to shared use results in a significant reduction in quality of provision for pedestrians. Indeed LTN1/20 which is the department for transports guidelines for cycle infrastructure states the following:

> *6.5.4 In urban areas, the conversion of a footway to shared use should be regarded as a last resort.* ***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****. Actual conflict may be rare, but the* ***interactions between people moving at different speeds can be perceived to be unsafe and inaccessible, particularly by vulnerable pedestrians. This adversely affects the comfort of both types of user, as well as directness for the cyclist.***

Shared use footways (pavements) are inappropriate where streets have frequent property entrances and driveways. The proposed shared use pavements cut across approximately 81 entrances to properties in the short 908 metre distance that the scheme covers. The proposed shared pavement scheme cuts across 1 property frontage for each 11.2m travelled This is a high rate of building frontages crossed in a short distance. Oving road is surrounded by existing and new developments that are under construction. It cannot realistically be argued these pavements run alongside interurban roads with few building frontages and planned to carry only low volumes of pedestrians. LTN1/20 instructs:

> *5.5.3* ***Where a route is also used by pedestrians, separate facilities should be provided for pedestrian and cycle movements****.*
>
> *However, away from the highway, and alongside busy interurban* ***roads with few pedestrians or building frontages, shared use might be adequate*** *(see Chapters 6 and 8).*
>
> *Such facilities should be designed to meet the needs of cycle traffic, however – including its width, alignment and treatment at side roads and other junctions.* ***Conversion of existing footways to shared use should only be considered when options that reuse carriageway*** *or other (e.g. verge)* ***space have been rejected as unworkable.***

2.4) Option 1 drawings show the proposed shared pavements rounding several blind corners where there will be inadequate inter-visibility between pedestrians and cyclists. LTN1/20 advises:

> *5.9.3 ...****Objects such as walls, fences and trees should not be sited close to the cycle track on the inside of bends as this will potentially affect the visibility.***

LTN1/20 Table 5-4 (Design Speed for off-carriageway cycle routes) states an **absolute min design speed of 20kph** for off carriageway cycle tracks and Table 5-5 (Stopping sight distances) gives a corresponding **minimum stopping sight distance of 17 metres**.

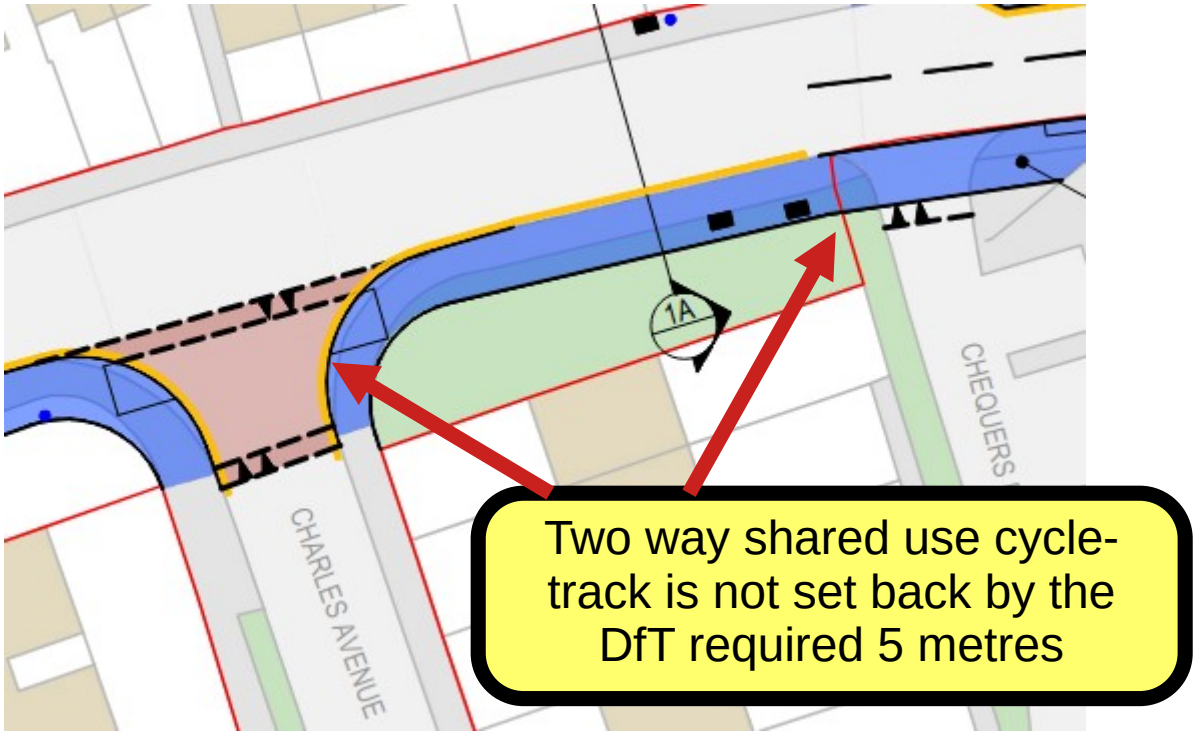
The following clips from Google maps show clearly that LTN1/20 17 metre SSD absolute minimum visibility are not achieved by the proposals on several corners.

It is unacceptable and dangerous to site cycle tracks on pavements that round such blind corners. This is why the Department for Transport advise against doing it.

2.5) LTN1/20 section 10.5 gives cycle design guidance on priority junctions. Option1 B2144 Oving Road shared use pavement proposals rely on routing two-way cycle traffic over the mouths of junctions while maintaining priority over traffic. However LTN 1/20 paragraph 10.5.24 states **this arrangement is suitable for one way cycle traffic only!**:

> *10.5.24* ***This approach is suitable for one way tracks travelling in the same direction as the adjacent traffic lane****, as shown in figure 10.17. Drivers must give way to cyclists when leaving the side road, but there is no priority for cyclists over traffic turning in.*

The image clip below from Option1 drawings shows no attempt to set the priority cycle crossing back by the DfT required 5 metre minimum despite having available space to do this.



Superseded former guidelines on shared use cycle ways (Local Transport Note 1/12) permitted two way cycle traffic to cross flush across the mouths of junctions, but it was not a recommended arrangement and strong safety warnings were given about such designs. LTN1/12 warned:

> *6.12 A common reason for taking cyclists off the carriageway is the perception that it will improve safety. However,* ***it is important to understand that a shared use route will not necessarily be safer than an on-carriageway alternative. In particular, careful consideration is needed where a cycle track running alongside a road crosses side a road****…*
>
> *6.13* ***Where cycle tracks alongside roads accommodate two-way flow, the potential for conflict can increase significantly. It is probable that drivers are less likely to expect cyclists to come from both directions because, intuitively, they might assume cyclists would be travelling in the same directions as traffic in the adjacent part of the carriageway****…*

2.6) Pound Farm Road has low traffic volumes. WSCC traffic surveys show that between 12th March 2017 and 26th March 2017 when a survey was conducted, daily traffic volumes did not exceed 1,700 vehicles a day! LTN1/20 gives the following guidance on cycling on quiet streets:

> *7.1.1* ***Where motor traffic flows are light and speeds are low, cyclists are likely to be able to cycle on-carriageway in mixed traffic****, as shown in Figure 4.1. Most people, especially with younger children, will not feel comfortable on-carriageways with more than* ***2,500*** *vehicles per day and speeds of more than* ***20 mph****. These values should be regarded as desirable upper limits for inclusive cycling within the carriageway.*

There is absolutely no advantage in forcing cyclists to ride on unsuitable urban pavements while it would far more desirable, much easier and cheaper to install street traffic calming on Pound Farm Road to increase motorists compliance with the existing 20mph speed limit.

2.7) LTN1/20 recommends at least a half metre separation between cyclists and parked cars to minimise conflict with car doors being opened as cyclists approach. Option 1 B2144 Oving Road proposals fail to include this important safety feature on the shared pavement along Pound Farm Road.

LTN1/20 Table 7-3 (Minimum widths of other carriageway features) clearly states that "**Separation strip should be at least 0.5m alongside kerbside parking and 1.5m where wheelchair access is required**". Paragraph 6.2.42 also states:

> *6.2.42* ***Kerbed island separation or light segregation (see Figure 6.15) that provides a buffer zone of at least 0.5m between cyclists and parked vehicles is recommended to minimise risk of collision between cyclists and vehicle doors. A clear, level width of 2.0m is required alongside disabled parking bays to allow users to unload a wheelchair and turn within the space.***

2.8) Option 1 B2144 Oving Road proposals show a ludicrously narrow shared use pavement on the A259 Whyke road. It is labelled as only 2.2 metres on the plans.

LTN1/20 Table 5-3 (Additional width at fixed objects) **requires additional width of 500mm** wherever a cycle track (including shared use) is bounded by features (such as brick walls) that are grater than 600mm in height.

The absolute minimum effective width for a cycle track (even if it is not shared use) is 2 metres and since the A259 pavement is bounded by walls exceeding 600mm high, to maintain the **absolute minimum** effective width, the shared pavement must be at least 2.5 metres wide! What is being offered is only 2.2 metres wide!

A short length of 2.5 meter wide narrow shared use pavement might be marginally acceptable in a quiet rural location but is wholly substandard for a busy urban location such as Whyke Rd. The proposed Option1 shared pavement along the A259 pavement fails to meet even the very lowest of standards. It is not safe, it will not encourage active travel, and it will be a waste of valuable public money.

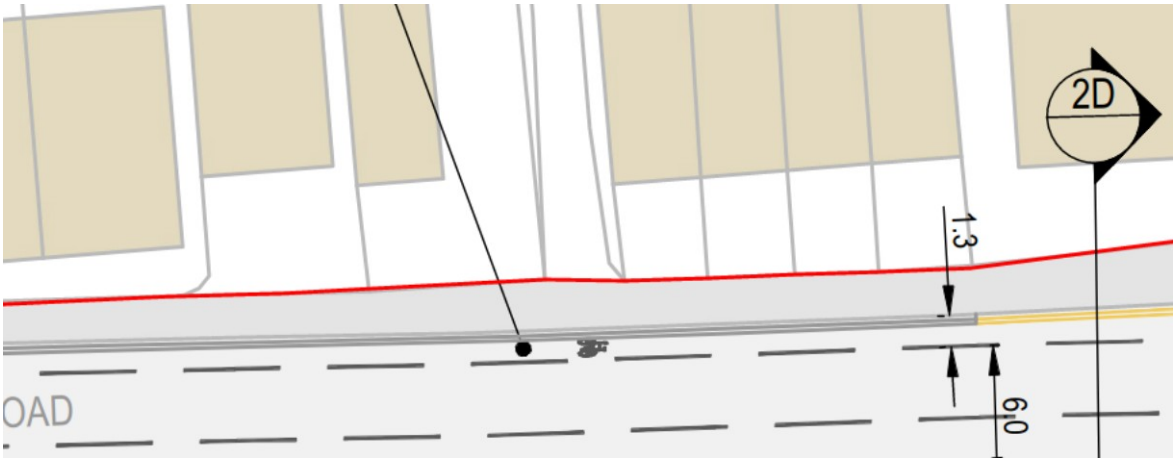
3) Option 2 offers no real protection to cyclists. National guidelines recommend it will do little to encourage walking and cycling **and should not be funded with public money**

3.1) Option2 B2144 Oving Road proposals are inadequate according to DfT guidelines and represent a waste of public money. Option2 is however a small improvement over Option1 that threatens to severely disadvantage pedestrians.

Gear Change (a bold vision for cycling and walking) is the currant national policy for walking and cycling. The following statement is made on page 20:

> ***Inadequate cycling infrastructure discourages cycling and wastes public money.*** *Much cycling infrastructure in this country is inadequate. It reflects a belief, conscious or otherwise, that hardly anyone cycles, that cycling is unimportant and that cycles must take no meaningful space from more important road users, such as motor vehicles and pedestrians.* ***It offers little protection from motor traffic and gives up at the points where any difficulty is faced or inconvenience to motorists is risked.*** *These are often, of course, precisely the places where cycling provision is most needed.*

3.2) Option2 offers only occasional short stretches of narrow advisory cycle lanes. The the cycle lane's width is **below the DfT absolute minimum**! The clip from the proposed plans below shows a section on the north side of Oving Rd that is only 1.3 metres in width!

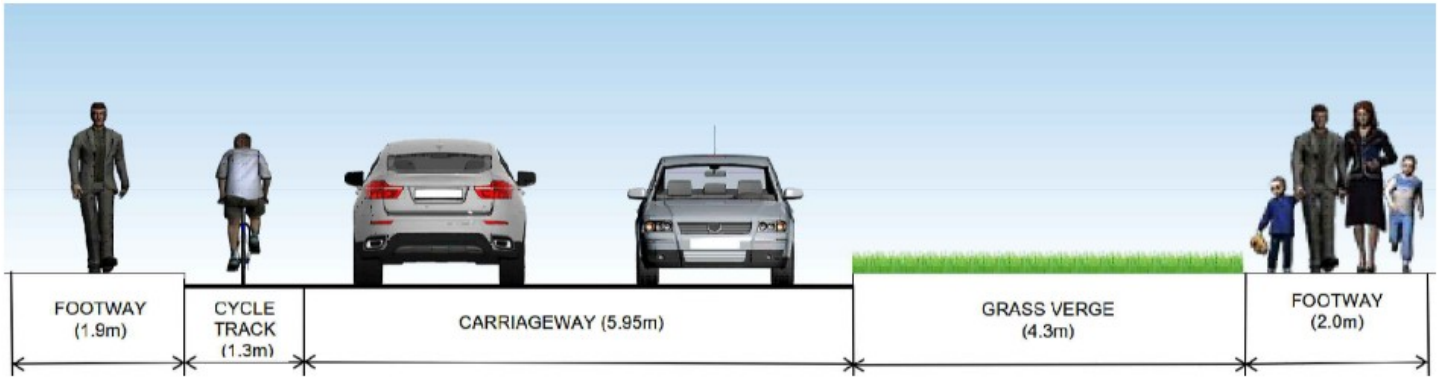


LTN1/20 gives safety advice warning against against using narrow cycle lanes:

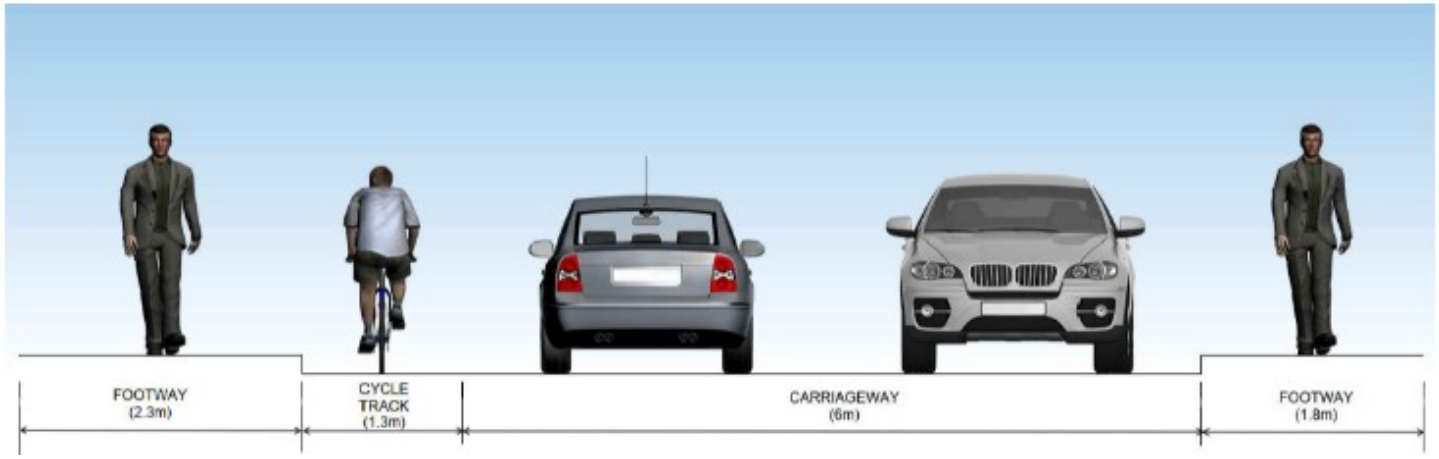
> *6.4.2 The width of cycle lanes should meet the geometric requirements set out in Chapter 5. A* ***2.0m wide*** *lane allows space for overtaking within the lane and* ***is the minimum recommended width****.*
>
> *6.4.3* ***Cycle Lanes less than 1.5m wide should not normally be used as they will exclude the use of the facility by larger cycles and are therefore not inclusive. They can also encourage 'close-passing' of cyclists by motorists, who tend to judge their road position with reference to the nearside marking****.*

Despite DfT warnings that cycle lanes below absolute minimum widths create hazards for cyclists, two of the sections shown in Option2 plans propose narrower cycle lanes. As can be seen below, Section 2-C and Section 2-D show cycle lane widths of only 1.3 metres. The DfT **absolute minimum** for a cycle lane is 1.5 metres at constraints. Both sections showing narrow cycle lanes are shown below:

SECTION 2-C
PROPOSED



SECTION 2-D
PROPOSED



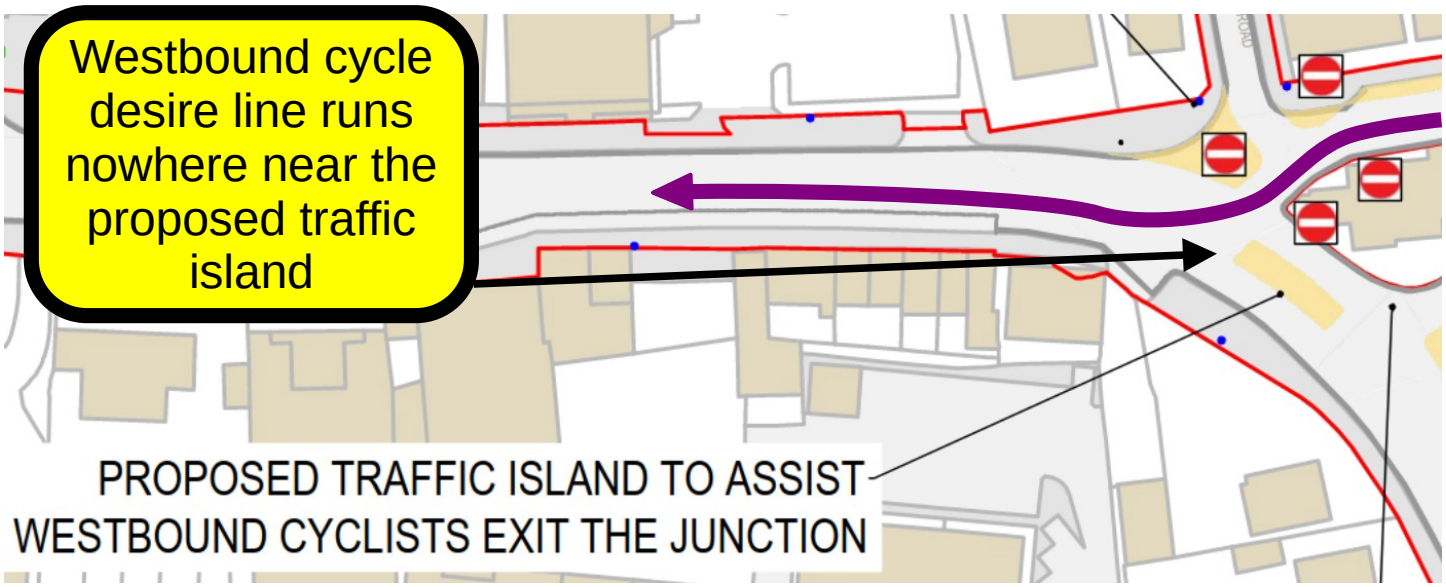
3.3) ChiCycle remain unconvinced that converting the western end of Oving Road to one-way traffic offers any significant advantage to cyclists. We can accept there may be a marginal improvement because eastbound cyclists may not be obscured by parked cars on the northern side of the road. However, the existing two-way traffic system efficiently calms traffic speeds. Traffic speed will increased if the street is converted to one way traffic. This disadvantage will more than offset any visibility safety advantage the one-way traffic scheme offers.

Pound Farm Road is currently a relatively quiet street who's low traffic already suits the needs of cyclists. Converting the western end of Oving Road to one-way traffic will substantially increase traffic on Pound Farm Road making it less suited to cyclists. This is not a desirable outcome.

As previously noted, Pound Farm road carried no more than 1,700 vehicles per day when surveyed in March 2017. During the Same period, the traffic outside No 41 on Oving Road once exceeded 3,800 vehicles per day and frequently saw volumes above 3,500 vehicles per day. The introduction of the one-way system will substantially increase traffic on Pound Farm road by diverting traffic from Oving Rd.

3.4) Text accompanying the Option2 proposals states there will be “A traffic island on the junction with the A259 Whyke Road to assist westbound cyclists in exiting the junction”.

Insufficient detail is given to make a full assessment of this intervention, but the island’s placement is well away from the desire line for cyclists and it will therefore provide no benefit. The diagram below illustrates the issue.



3.5) B2144 Oving Road Option2 proposals are largely cosmetic interventions bringing few or no benefits to cyclists. Gear change (national policy on walking and cycling) Summary Principal No7 gives the following statement about such schemes:

> *Largely cosmetic interventions which bring few or no benefits for cycling or walking* ***will not be funded from any cycling or walking budget****.*
>
> *Too many schemes badged as being for cycling or walking do little more than prettify the status quo, such as installing nicer-looking pavements and road surfaces but* ***doing little or nothing to restrict through traffic or provide safe space for cycling****. Schemes whose main purpose and/or effect is aesthetic improvement of the public realm* ***must be funded from other budgets****.*

4) Conclusion

4.1) West Sussex Transport Plan 2022 to 2036 prioritises active travel opportunities in Chichester. It is the second highest priority in the medium term and the absolutely highest long term priority.

The only existing cycle infrastructure in the city that currently close to meeting DfT standards is Centurion Way. However maintenance of this leisure route is poor. West of Chichester modifications have now made part of the route unsafe and a proposed Southern Access Road threatens to cut off the routes access from the city.

Many other pieces of infrastructure in the city are labelled as cycle routes but are either poor quality (falling significantly below national minimum standards) or are entirely unusable and inherently unsuitable for cycling.

Active travel may not be a current priority for WSCC but this does not excuse local authorities from their NPPF planning responsibilities to ensure walking and cycling opportunities for new residents in Shopwhyke Lakes and New Fields housing developments.

Rather than waste valuable public money on low quality and substandard Option1 and Option2 proposals, why does WSCC not strive to deliver a fraction of their medium term commitment by providing a solution **at least meeting absolute minimum DfT standards for walking and cycling?**

Medium term (2027-32) priorities for the Chichester area (excluding SDNP)

- A27 Chichester major scheme
- Active travel route priorities
- On-street electric vehicle charging infrastructure in remaining areas

Long term (2032-36) priorities for the Chichester area (excluding SDNP)

- Active travel route priorities
- Reconfigured West Coastway services
- Potential local highway improvements (subject to need)

4.2) Rather than achieving constructive engagement with the community, exhibition of such low quality proposals has raised the following concerns.

- WSCC advises CDC on road planning matters but these proposals clearly show the County Council lack the required competency to advise on highway design and town planning matters.
- Professional draftsmen have been employed to draw up these sub standard Option1 and Option2 designs on behalf of WSCC. How is this use of public money justified without someone with professional competence in DfT compliant highway design having first vetting the proposals prior to the drafting process?