September 29 2003

Our ref: L03007
Your ref:

Graham Lowe, Esq.
Engineering Manager
Cambridge City Council
The Guildhall
Cambridge CB2 3QJ

Dear Mr Lowe,

The City of Cambridge Area C (Consolidation) Order 1993
(Amendment No.31) Order 2003 dated 5th September 2003

This letter is a formal objection by Cambridge Cycling Campaign to the above Order.

The grounds for our objection are as follows:

The proposed bus lane would cause a serious and unacceptable reduction in the quality of the provision for cyclists along Milton Road, a major radial cycling route used by some 1000 cyclists a day (twelve-hour cycling census carried out by Cambridge Cycling Campaign on 4th February 2003). Such a reduction in quality of provision is directly contrary to the declared policies of both Cambridge City Council and Cambridgeshire County Council which emphasise priority for the improvement of local provision for cyclists. Improvements made to cycling facilities elsewhere in Cambridge cannot compensate for quality reduction along major radial cycling routes such as this one where cycling provision must be not only protected but also improved in order to conform to agreed policies for the promotion of cycling. Both Councils are committed to increasing the number of cyclists in Cambridge but have failed to reach targets for such an increase. We believe that present policies for bus lanes on major radial routes run the risk of discouraging cycling. In the case of Milton Road it is particularly important that cyclists should not be discouraged just at the time when cycling conditions on the route to Milton are to be improved by the construction of the bridge over the A14.

The remainder of this letter sets out the ways in which the bus lane proposal damages provision for cyclists along this section of Milton Road and questions the need for the bus lane.

Why the bus lane proposal damages cycling provision along this section of Milton Road

Where there are as many side roads and driveways as there are along this section of Milton Road, the majority of cyclists are likely to prefer to cycle on-road than on an off-road pavement cycleway. On-road cyclists have a straighter route, better visibility, clearer priority

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over turning vehicles, easier provision for overtaking other cyclists, a more level surface to cycle on and less likelihood of collision with pedestrians. Our twelve-hour census near Kendal Way in February 2003 showed that 58% of cyclists chose to cycle on-road.

Now that the detailed drawings are available, we recognise that real efforts have been made to improve off-road cycling provision. But the proposed provision is still insufficient and, indeed, given the space available, could not be sufficient to compensate for the damage to on-road cycling provision.

Damage to on-road provision for cycling

- We object to the proposed removal of the mandatory on-road cycle lane on the east side of Milton Road. Mandatory on-road cycle lanes are an important part of the provision for cyclists on Milton Road.

- We object to the narrowed inbound traffic lane proposed for the east side of Milton Road. Traffic lanes only three metres wide cause serious problems for cyclists. When there is outbound queuing traffic, inbound vehicles, including buses, will try to squeeze past too close to cyclists. We know this would happen as it already happens regularly to cyclists who use the narrowed northbound lane opposite the existing stretch of bus lane on Milton Road. It happens so often that Cambridge cyclists have christened this problem “the Milton Road effect.” One of the worst consequences of the Milton Road effect is to create antagonism between cyclists and motorists. Cyclists who choose to cycle on-road, as is their right, and who hold up motorists trying to pass them are increasingly subjected to abusive behaviour by motorists. Milton Road is already notorious among Cambridge cyclists for the unpleasantness of its cycling provision. The current proposal would increase this unpleasantness.

- We object to the proposed narrow northbound bus and cycle lane which would be only three metres wide, an entirely insufficient width for buses more than 2.5 metres wide to overtake cyclists safely, especially when traffic is queuing in the adjacent traffic lane. Inevitably some buses (and some taxis and hire cars) would be delayed by cyclists and this would tend to negate the advantage of the bus lane for bus (and taxi) passengers.

- We object to the proposed removal of the island in the centre of the light-controlled crossing close to Kendal Way. At present many of the pedestrians and cyclists using the crossing do so without activating the lights because they can pause safely on the island in the centre of the road. Removing the island would make it more often necessary to activate the lights and for this reason would cause increased delays for pedestrians and cyclists using the crossing as well as for all the Milton Road traffic including buses. (We welcome the proposed upgrading of the crossing from a Pelican to a Toucan.)

Problems with the proposed off-road cycleway provision

Pavement cycleways segregated from the pedestrian part of the pavement are proposed for both the east and the west sides of this length of Milton Road. In both cases, although they would be available for two-way cycling, they would be only 1.5 metres wide for most of their length. This is just half of the three metre width recommended for two-way cycling in the government publication *Cycle-Friendly Infrastructure* and cannot possibly be regarded as satisfactory provision. Inevitably cyclists would encroach on the pedestrian section of the pavement when meeting an oncoming cyclist or when passing a slower cyclist travelling in the same direction. Pavement cycleways used by large numbers of cyclists are understandably unpopular with pedestrians, especially elderly pedestrians, even when the provision is segregated. The narrowness of both the proposed pedestrian and the cycle pavement provision would be likely to heighten the fears of pedestrians and the worrying
antagonism towards cyclists which is increasing in Cambridge and is now regularly displayed on the letters page of the Cambridge Evening News.

We greatly welcome the fact that, almost for the first time in Cambridge, cyclists would be given priority over side-road traffic for one of the side-road crossings (Woodhead Drive). This is an important step towards long-accepted cycling practice on the Continent. Pedestrians in this country have always had a kind of priority over vehicles when crossing side roads at junctions (Highway Code, rule 182) but Cambridge cyclists have until now been denied any kind of priority for such crossings.

Sadly, however, the potential benefits of this valuable innovation have been largely negated by a refusal to make the crossing a direct one continuing the pavement cycleway straight across the side road. Instead it would be diverted and would cross the side road ten metres in. The claim is that this would improve safety, but we believe that this is questionable because the diversion would make motorists and cyclists less visible to each other. At the same time the sharp turns which cyclists would have to make would increase the likelihood of collisions with pedestrians and other cyclists. If direct crossings with priority provide acceptable levels of safety in Continental Europe, we cannot agree that they are unacceptable here. We would favour direct crossings with full priority for both cyclists and pedestrians across all five side roads, none of which carry heavy traffic. We welcome the fact that all five crossings would be ramped.

We acknowledge the efforts that have, in this instance, been made to create acceptable pavement cycleways along both sides of Milton Road. We recognise that for a minority of cyclists who are intimidated by on-road cycling these would offer real advantages. But we reject the idea that the proposed pavement cycleways would be suitable for most cyclists using this section of Milton Road. There are just too many driveways, too many side-road crossings and too many cyclists to be accommodated on the narrow pavements of this road.

**Lack of evidence that the proposed bus lane would significantly improve bus timings**

The reason given for the proposed Order is “to facilitate the movement of buses as part of the Cambridgeshire Bus Strategy in order to encourage further increases in bus use.” We strongly support the aims of the Bus Strategy but disagree with some of the methods by which it is being implemented. In general terms we believe that the application of direct measures (such as a reduction of parking spaces and congestion charging) to reduce the number of other vehicles using the radial routes into Cambridge would be essential for bus timings and bus use to be substantially improved. On-street bus ticketing combined with a prohibition on boarding a bus without a ticket would also speed up bus timings.

The length of the proposed bus lane is some 350 metres. We question whether bus timings would be significantly improved by the creation of this length of lane. The evidence provided that regular peak period delays occur which would be relieved by the proposed bus lane is wholly unsatisfactory. In our submission of 10 March 2003 to the last round of consultations, we criticised the absence of evidence for the assertion that during the peak “buses can be delayed for up to 7 minutes while queuing northbound on this section of Milton Road.” At the latest consultation earlier this month, we were surprised to be told that the only evidence gathered is a small set of GPS timings. As far as we have been able to ascertain, these do not show how many buses are delayed during the peak period, how long the delays are or when during the year they occur. To create a bus lane without having clearly defined the problem which it is supposed to relieve seems to us unacceptable.

It is important to recognise that in some respects the bus lane would add to the delays. We have already commented on the fact that at times cyclists in the bus lane would delay buses. Much more important, the bus stop opposite Kendal Way would hold up following buses when passengers board a bus and buy their tickets.
The main cause of the delays to northbound traffic which the proposed bus lane is intended to relieve is generally acknowledged to be tailbacks from the junctions at the Science Park and at the A14. The proposed changes to the Science Park junction and the proposed third lane on the approach to the A14 might relieve much of the delay and it seems to us wholly inappropriate to introduce a bus lane to resolve a problem which might no longer exist by the time that the bus lane is constructed. At an earlier stage we opposed these changes because they make matters more difficult for cyclists further up Milton Road. However, now that they have been approved the situation is different. They should, we believe, be installed first. No decision on the bus lane should be taken now. The case for the bus lane should be reassessed at some point in the future, taking into account the traffic changes which will result from the alterations.

Yours sincerely,
on behalf of Cambridge Cycling Campaign,

Clare Macrae

Copy to Alistair Frost
   Assistant Project Officer
   Cambridgeshire County Council