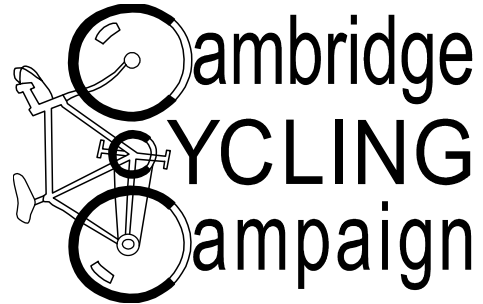


August 13, 2004

Our ref: C 04 014a
Your ref:

Dominic Corby
CLT4 - Local Travel Environment Branch
Zone 3/19
Great Minster House
76 Marsham Street
London SW1P 4DR
LTN.consultation@dft.gsi.gov.uk



Cambridge Cycling Campaign

P.O. Box 204, Cambridge CB4 3FN
01223 690718 (phone & fax)
contact@camcycle.org.uk
www.camcycle.org.uk

Dear Mr Corby,

Local Transport Notes on walking and cycling

We write in response to your consultation¹ on two Local Transport Notes on walking and cycling.

By way of introduction, Cambridge Cycling Campaign is a local voluntary organisation with over 700 members. We work closely with local government and others to improve conditions for cyclists in Cambridge. Government statistics show that in Cambridge more than 25% of local people cycle to work and that this is much the highest figure for the UK.

Overview

In general, we strongly welcome these documents. They give the clear impression that they have been written by people who cycle regularly and who understand the needs of cyclists.

We particularly welcome the fact that these Notes promote many items of best practice to the status of official government policy. We are glad to see that many of the recommendations in publications such as Cycle-Friendly Infrastructure² have been promoted in this way.

Our main concern would be the extent to which the recommendations in the Notes will actually be translated into practice on the ground. Even in Local Authorities such as our own, which has historically had a reasonable degree of commitment to the needs of cyclists and walkers, best practice is rarely adhered to, particularly with regard to widths of cycle lanes and tracks and to the priority given to cyclists on the roads, and we have often had to press extremely hard to get even basic standards implemented.

However, the presence of strong Local Transport Notes which helpfully summarise many areas of best practice into a single document, will be helpful, particularly with under-

1 http://www.dft.gov.uk/stellent/groups/dft_localtrans/documents/page/dft_localtrans_028705.hcsp

2 <http://www.iht.org/IHT.org/pub/CycleFriendly.html>

performing Local Authorities. Indeed, we feel that if the advice in the Notes were consistently translated into practice on the ground, the UK would arguably have some of the best provision for cyclists in Europe.

Although the Notes overall are strong and well-written, there are several areas which we feel could be improved, which we outline in the attached documents.

Comments on LTN1/04 - Policy, Planning and Design for Walking and Cycling

Please find attached our comments as letter ref. C04014b. In it, we respond to the points in your questionnaire, and then outline several areas which we particularly welcome and which we feel the Department should be congratulated for stating formally as policy. We conclude with the areas we feel need improvement.

Comments on LTN2/04 - Adjacent and Shared Use Facilities for Pedestrians & Cyclists

Please find attached our comments as letter ref. C04014c, which is similarly structured.

General transport regulations

Whilst writing, we wish to raise a few points which are related to a number of aspects in the Notes, but which we recognise would require changes to the DfT's rules.

A few of the measures which would most benefit cyclists cannot currently be done easily within the UK because of particular regulations which exist. We would like to see relaxation of several measures, as outlined below, which would greatly increase the chance of widescale improvements for cyclists.

- a) S. 4.2.8 in LTN1/04 refers to the methods which Local Authorities should use when implementing cycle exemptions from one-way orders. Exemptions in such streets are extremely useful for cyclists.

At present a physical bollard needs to be constructed in the road to provide a cycle gap so cyclists are not actually riding past the no entry sign. The expense and space required makes it difficult for our local highway authority to implement schemes even when there is the desire to do so. Relaxation of the regulations here would also make it easier for highway authorities to implement other schemes where cyclists need to be exempted from no entry sign such as in vehicle restricted areas, bus/taxi gates and the like.

We therefore again request reconsideration by the Department to enable an 'Except Cyclists' sign to be considered acceptable underneath a 'No Entry' sign. This seems to work fine in other European countries. A precedent already exists in the UK for bus exemptions³, seemingly without problems.

Unless such a common sense approach is adopted, there is no hope for widescale adoption of making one-way streets two-way for cyclists, despite this being a simple and cheap measure representing a "quick win" for cyclists.

- b) Related, we wish to see the introduction of traffic lights which allow a cycle left filter. This would allow cyclists to turn left into a side road whilst preventing other traffic (including

³ See <http://www.hmso.gov.uk/si/si2002/02311334.gif> and <http://www.hmso.gov.uk/si/si2002/023113aa.gif> - which shows that plate 616 ('No entry for vehicular traffic' sign) can be used with plate 954 ('Except buses' sign) but not 954.4 ('Except cycles' sign).

cyclists) from proceeding while lights are red, purely by the use of signing/lights and without the construction of an extra lane.

Locations in question are those where there would be no conflicting traffic or pedestrian movements, and where the highway authority would be happy to implement a cycle filter but cannot do so at present because of lack of space or funds to construct a separate lane. There are several locations in Cambridge where such an arrangement would be of clear benefit to cyclists and pedestrians alike and would reduce any potential conflict between these two groups.

This example from Germany shows the simplicity of a potential solution:



- c) We would like to see the Department consider the introduction of regulations which would allow a 'pedestrians and cyclists may cross phase' at signalled junctions, as works well in other European countries.

This would represent an extension to the existing regulations for an 'all green' phase for pedestrians which allows on-road cyclists (who would otherwise be waiting at a red signal) to proceed in all directions at the same time as pedestrians, perhaps requiring cyclists to give way to pedestrians.

- d) We feel there is an argument for a national standard for [colours and] surface quality of cycle lanes. Red and green surfacing is variously used in different locations around the UK.

Conclusion

We hope the points in the attached letters are useful in finalising your draft, and hope you will give serious consideration to them. We hope also you will forward the above points on general transport regulations to the relevant contact in the Department.

Yours sincerely,
on behalf of Cambridge Cycling Campaign,

Martin Lucas-Smith
Co-ordinator

August 13, 2004

Our ref: C 04 014b
Your ref:

Dominic Corby
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Dear Mr Corby,

Local Transport Notes on walking and cycling: LTN1/04

We write in response to your consultation¹ on two Local Transport Notes on walking and cycling.

This is the second of three letters, and comments on the first of the two Notes, 'LTN 1/04 - Policy, Planning and Design for Walking and Cycling'. It should be read in conjunction with our letter ref C04014a, which accompanies both this letter and a third letter commenting on LTN2/04.

In general, we strongly welcome this document. It gives the clear impression that it has been written by people who cycle regularly and who understand the needs of cyclists.

Below, we firstly respond to the points in your questionnaire, and then outline several areas which we particularly welcome and which we feel the Department should be congratulated for stating formally as policy. We conclude with the areas we feel need improvement.

Local Transport Notes - Questionnaire

In response to the points raised in your questionnaire², we give the following answers:

- 1) Yes, we agree that minimum requirements for pedestrian and cyclist infrastructure are encapsulated as "Convenient, Accessible, Safe, Comfortable and Attractive" (s. 3.2). We particularly welcome the emphasis on convenience and comfort.
- 2) With regard to the various categories of "design cyclists" (s. 3.4), we feel that these are broadly correct, although experienced leisure cyclists have been omitted as a category. We feel that, in practice, provision on the ground will usually resolve to either on-road

¹ http://www.dft.gov.uk/stellent/groups/dft_localtrans/documents/page/dft_localtrans_028705.hcsp

² http://www.dft.gov.uk/stellent/groups/dft_localtrans/documents/page/dft_localtrans_028713.hcsp

and off-road provision for more experienced and less experienced cyclists across these groups.

- 3) No. We feel that greater prominence should be given where possible to the hierarchies of provision (s. 3.6), as this is often ignored by engineers yet, in our view, represents an optimal framework for planning for a cycle-friendly environment.
- 4) Yes, we feel the speed-flow diagram (s. 3.7) is still clear without the addition of detailed figures.
- 5) We are very happy with the table of key planning issues (s. 3.8) and particularly welcome the mention of “permeable Infrastructure” and “exemption from traffic management measures” (measures whose purpose is traffic management rather than explicitly stopping cyclists).
- 6) With regard to audit and review of schemes (s. 3.9), please see our notes which follow. In summary, we feel that in practice, Local Authorities give insufficient emphasis to audit and review, and that, where they do take place, there is currently insufficient openness.
- 7) We agree that cyclists may be safer using a minimum width bus lane rather than having to use an alternative route (s. 4.10), and indeed suggest that most cyclists will do so anyway because the former is likely to be more direct and convenient.
- 8) Our only comment on the flowcharts at the back of the document is that anything which can be done to emphasise the hierarchies of provision would be welcome. We also feel that Local Authorities should explicitly be required to publish their ‘route’ through this diagram in the form of a published justification of their decision to employ particular types of infrastructure.
- 9) Our other comments on LTN 1/04 follow.

Areas we particularly welcome

There are a large number of areas which we welcome strongly. We feel the following are of particular note:

- a) We welcome the emphasis on the importance of the planning system as a major factor in moving towards a more sustainable transport system (s. 2.1.4, 3.10.1, 3.10.2), and the use of “human-scale developments”.
- b) We welcome the emphasis of speed reduction as a key means of promoting cycling (s. 2.3.5, 4.3.2, 4.3.6-4.3.8). We would like to see 20mph zones becoming the norm in city centres and areas of housing.
- c) We welcome the recognition that “invisible infrastructure” is an important aspect in providing convenience (as well as safety) for cyclists (s. 3.13).
- d) We welcome the recognition that convenience is an extremely important factor in encouraging cycling (s. 3.2), summed up by the need for “positive provision that reduces delay, diversion and danger”. We feel that safety will often naturally follow as a side-effect of convenience and that Local Authorities should think in these terms, rather than seeing provision for cyclists as requiring new infrastructure designed to cradle cyclists away from traffic.
- e) We welcome the recognition that the perception of safety as well as safety itself is a key factor in choices made by cyclists (s. 3.2.5).

- f) We welcome the emphasis on comfort (3.2.6, 4.5.3). This sort of detail again indicates a good understanding of the real needs of cyclists.
- g) We are pleased to see justification for dual networks catering for different ‘types’ of cyclists, analogous to motorist choice between busy main roads and less direct but safer service roads (s. 3.5.4).
- h) We very strongly welcome the explicit statement of a hierarchy of provision (s. 3.6.1); that ‘cycle facilities’ are often not necessarily the best way of catering for cyclists and that at other times the question of “whether” rather than “how” cycle provision is needed is important.
- i) We welcome the emphasis on “Permeable Infrastructure” (table 3.8, s. 4.2.8, 4.11.6), particularly the “exemption from traffic management measures” (measures whose purpose is traffic management rather than explicitly stopping cyclists). We have published a Position Paper on this subject³.
- j) We also welcome the emphasis (in table 3.8) on “accessible, barrier-free environment”, recognising that people are more likely to cycle when they have a direct, high-quality route, unencumbered with obstructions. Such obstructions are a problem which we ourselves have been monitoring⁴ locally. The Note should state that chicanes should not be employed on cycle paths; motorists do not have to contend with such barriers. Instead, bollards should be used in cases where absolutely necessary.
- k) We welcome the reference to the conclusion in TAL 9/93 that “there are no real factors to justify excluding cyclists from pedestrian areas” and that “accidents between pedestrians and cyclists in pedestrianised areas are very rare” (s. 4.2.3). We feel that where problems do exist, police enforcement would be a better solution than banning all cyclists due to an inconsiderate majority.
- l) We welcome the statement that “removing on-street parking can help to release road space” for cyclists (s. 4.2.13). This is a factor which we feel would significantly improve the cycling experience.
- m) We welcome the statement that road “widths between 3.1m and 3.9m should be avoided” on safety grounds to prevent unsafe overtaking manoeuvres (s. 4.3.12).
- n) We welcome the explicit statement that “scheme designers should take care that the carriageway width is not reduced to such an extent that cyclists’ safety is compromised”. This has been a continual concern in Cambridge, to the extent that it is often dubbed the ‘Milton Road Effect’⁵ due to bus lanes which effectively force cyclists off the road.
- o) We welcome the emphasis on pedestrian-friendly environments, through measures such as the removal of guard rails and the removal of staggered pelican crossings (s. 4.5.2), and the re-timing of traffic signals (s. 4.6.2).

³ <http://www.camcycle.org.uk/campaigning/papers/#onewaystreets>

⁴ <http://www.camcycle.org.uk/campaigning/subgroups/obstructions/>

⁵ <http://www.camcycle.org.uk/newsletters/45/article1.html>

Areas we wish to see improved – particular importance

- a) We feel very strongly that, in the table of hierarchies of provision (table 3.6), “cycle lanes” and “segregated cycle tracks constructed by reallocation of carriageway space” should be split from, and should precede, “cycle tracks away from roads”. We feel this would better reflect statements elsewhere in the guide and also the inherent problems with the latter form of provision.
- b) We feel there is a desperate need to strengthen the emphasis in s. 4.11.2 on the width of cycle lanes. Far too often, lanes of inadequate width are installed, often totally unnecessarily. We feel that the statement that “cycle lanes should preferably be a minimum of 1.5m wide” is too weak and actually *encourages* substandard provision. We therefore urge the Department to improve this advice with clear statements that: (a) cycle lanes should be a minimum of 1.5m wide; (b) where a width of 1.5m would leave the main traffic lane too narrow, no lane is usually better than a substandard lane or that an advisory lane should be installed (which other vehicles can legally move into); and (c) cycle lanes should never be placed directly next to parked vehicles without use of a buffer zone (to reduce the danger of car doors opening into the passage of cycles). Furthermore, we would like to see an explicit ‘preferable width’ which Local Authorities should aim for. We feel these points should take the form of an expanded s. 4.11.
- c) We would like to see recommendation and discussion of what we would call ‘hybrid cycle lanes’, such as has been tried in Oxford and elsewhere, employing on-road cycle lanes but with a degree of segregation. We feel this form of provision would benefit both more and less experienced cyclists and combines the best aspects of on-road and off-road provision.



St Cross Road⁶, Oxford: cyclists receive protection from traffic but can easily join or leave the cycle lane. The separators should probably be slightly less protruding, for safety reasons.



Århus, Denmark⁷: Cycle tracks merge smoothly with the road at minor junctions

⁶ <http://www.camcycle.org.uk/newsletters/27/article7.html>

⁷ <http://www.camcycle.org.uk/newsletters/30/article11.html>

- d) We would like to see a clear statement that cyclists should not effectively become a form of traffic calming through narrowing of the carriageway by providing cycle lanes of inadequate width.
- e) We would like to see a clear statement that off-road provision should never disadvantage cyclists who choose (for whatever reason), to exercise their right to stay on the road.
- f) We wish to see improved emphasis on the need to prevent loss of priority at crossings of side-roads which occur on many off-carriageway cycle tracks. We feel current unwillingness to maintain such priority is a particular disbenefit of such tracks (s. 4.9.2).

Areas we wish to see improved – other

- a) We feel there is a need to strengthen the section on consultation (s. 3.11), particularly to give greater emphasis to the views of cyclists' groups such as ourselves. We welcome the statement that a local authority should be able to demonstrate the rationale for a decision to implement a design that does not comply with national/local policies (s. 3.11.1) although in practice we feel local authorities such as our own will regrettably not do so.
- b) We feel there could be greater emphasis (e.g. in s. 2.5) on the need to improve *existing* infrastructure, however small, that could be upgraded to aim for best practice.
- c) We feel that s. 3.3 does not adequately recognise the unfortunate reality that decision-makers often feel unable to reduce highway capacity in favour of users higher up in the hierarchy of users. This section could provide suggestions on how this mediation might be most effectively achieved in practice.
- d) We feel that the definition of "cycle tracks away from roads" (table 3.6) could be clarified in respect of rural provision.
- e) In the diagram in section 3.7, we feel that the sentence referring to "20mph zones" should start "With-flow cycle lanes can be considered..." for clarity.
- f) Section 3.9 needs to stress the importance of all stages of audit being publicly-available. We have been denied access to a safety audit⁸, a situation we find unacceptable. Separately, we feel that the number of audits of various kinds makes cycle audit increasingly unlikely, and that some combined system might make auditing for cycling needs more likely.
- g) The reference to limits to cycling distances (s. 3.10.3) needs to distinguish between flat and hilly areas.
- h) We feel there is a discrepancy in s. 4.2.3 with s. 4.2.6, and that the use of the word "constructive" in the latter is not appropriate.
- i) We would like to see emphasis in s. 4.2.8 on getting *existing* closures opened to benefit cyclists.
- j) In section 4.3.12, we do not believe that central refuges always need to be 2m wide; indeed there are many cases when such a width would reduce the carriageway width to the detriment of cyclists.

⁸ <http://www.camcycle.org.uk/newsletters/52/article1.html>

- k) We would like to see commitment in s. 4.2.9 and 4.6 to the removal of *existing* guard rails, which we feel can both be extremely dangerous for cyclists (in respect of left-turning lorries, for example) and which reduce considerably the quality of the walking environment.
- l) The need for a good visibility splay at any crossings on any off-carriageway cycle tracks should be mentioned in s. 4.9.2.
- m) In s. 4.11.1, we would like to see mention of smooth, coloured surfacing when cycle lanes cross side-roads.
- n) In s. 4.10.1, we would like to see a statement to the effect that, where overtaking of cyclists by buses is likely to take place commonly, a wide advisory cycle lane is needed within the bus lane itself, as is common in Cambridge.
- o) We would like mention that, at the entrance to an off-road cycle path from the road, cyclists should never be forced onto the path, i.e. by the presence of an obstruction just after the point where the cyclist has the option to leave the road.
- p) The last sentence of s. 4.11.6 should end with "... less direct route, and that illegal use may result".
- q) In s. 4.9.1, we wish to see a clear statement that, *when* a feeder lane is provided, this should be of a proper width, even if this infers a wide advisory lane.
- r) In s. 4.12.1, we feel that the reader should be reminded that cycle tracks are often a form of provision of last resort – in line with the hierarchy of provision outlined earlier – and that such provision should not be seen as a means to 'get cyclists off the road'.
- s) In s. 4.12.3, a typographical clarification is needed here, to add the following words in italics: "... in favour of physical segregation *between pedestrians and cyclists* unless conditions ...".
- t) S. 4.13 should include the remark that on-street cycle parking can be very effective. The removal of only a few car parking spaces can vastly improve the amount of cycle parking whilst not resulting in pavements being blocked with cycles.
- u) S. 4.13 should mention managed provision, such as staffed cycle parks.
- v) Under s. 4.13.4, we suggest that mention be given to the need for signage to cater for both linkages between main sections of a city as well as locations within such sections.
- w) The paper should make reference to the need for providing a straight-ahead cycle lane (of good width) where a left-turn lane exists at a junction. We have published a Position Paper on this subject⁹.
- x) We would wish to see that the final typeset version of the Note features a range of cyclists, young and old, helmeted and not-helmeted. Photos of cyclists should be representative of cyclists in general and show a representative mix of types of bike, gender, skin colour and use of headgear.

We hope the above points are useful in finalising your draft, and hope you will give serious consideration to them.

⁹ <http://www.camcycle.org.uk/campaigning/papers/#leftturnlanes>

Yours sincerely,
on behalf of Cambridge Cycling Campaign,

Martin Lucas-Smith
Co-ordinator

August 13, 2004

Our ref: C 04 014c
Your ref:

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CLT4 - Local Travel Environment Branch
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Dear Mr Corby,

Local Transport Notes on walking and cycling: LTN2/04

We write in response to your consultation¹ on two Local Transport Notes on walking and cycling.

This is the third of three letters, and comments on the second of the two Notes, 'LTN 2/04 - Adjacent and Shared Use Facilities for Pedestrians and Cyclists'. It should be read in conjunction with our letter ref C04014a, which accompanies both this letter and the second letter commenting on LTN2/04.

In general, we feel the advice in this document is sound. Our main comment, however, would be that the presence of a whole document on a form of provision which is lower down in the hierarchy of provision, when there is no equivalent for on-road forms of provision, may set the wrong impression. We do feel there is a lack of best practice and understanding of on-road forms of provision, which should take higher priority.

Below, we firstly respond to the points in your questionnaire, and then outline several areas which we particularly welcome and which we feel the Department should be congratulated for stating formally as policy. We conclude with the areas we feel need improvement.

Local Transport Notes - Questionnaire

In response to the points raised in your questionnaire², we give the following answers:

10) We feel the amount of attention given to site assessment (s. 4) is about right.

11) With regard to the need to "consult potential users and other interest groups properly ... [for an] adjacent or shared use facility" (s. 5), we remain concerned that engineers in

¹ http://www.dft.gov.uk/stellent/groups/dft_localtrans/documents/page/dft_localtrans_028705.hcsp

² http://www.dft.gov.uk/stellent/groups/dft_localtrans/documents/page/dft_localtrans_028713.hcsp

practice see such provision as provision of first resort. Given this, we believe the section on consultation needs to be strengthened, although this would not be necessary if other advice to follow the hierarchy of provision were actually followed.

- 12) We feel strongly that segregation between pedestrians and cyclists on off-road facilities should never be considered where the combined width is only 3m. This is barely enough room for two cyclists to pass each other and leads to an uncomfortable situation for people walking; indeed 1.8m alone is needed for someone with a wheelchair/pushchair. A greater width should be required.
- 13) We recognise the concerns on this issue; our only comment is that we feel this area needs further research to ensure a good balance between different types of user.
- 14) Our other comments on LTN 2/04 follow.

Areas we particularly welcome

There are a large number of areas which we welcome strongly. We feel the following are of particular note:

- a) We strongly welcome the need for documentation of decisions where “an on-carriageway solution has been rejected” (s. 3.3.2).
- b) We welcome the statement, that “promoters should be ready to ... abandon [a] scheme if need be” (s. 5.2.4) in response to consultation. We agree that the creation of new infrastructure does not necessarily always result in an improvement over doing nothing.
- c) We particularly welcome the use of bold text to emphasise that “practitioners should not regard minimum widths as design targets” (s. 6.2.2). This is a common problem. We feel that a ‘desirable’ width could be stated at this point.
- d) We welcome the statement that the Department recommends “against [the use of permissive rights] being used on any local authority owned footpaths” (s. 10.1.8). This is a particular problem in Cambridge, where we understand practically all such paths are permissive.
- e) We welcome the summary on pedestrianised areas (s. 8.2.1), although the need for effective enforcement partnerships against ‘rogue’ cyclists should be mentioned. We suggest that such areas should more commonly be referred to as “vehicle restricted areas”. We like the common-sense approach suggested for occasional cycle logos to indicate the sharing of space with pedestrians (8.2.3).
- f) We particularly welcome the statement that “A footway crossed by many driveways, and where sightlines are very poor, would normally be unsuitable for introducing cycle use”. Such provision is unfortunately common. We suggest that this text be repeated earlier in document to give additional emphasis to this point. We feel that this is one of a number of points which highlight the often inadequate nature of cycle track provision and why on-road solutions should always be considered first.
- g) We welcome the statement that “bollards can be a particular problem for cyclists” (s. 9.6.2). These and similar obstructions can significantly reduce the quality of a cycle journey.
- h) We welcome the insight that “badly planned or designed facilities encourage [illegal or inconsiderate] behaviour” (s. 10.2.1).

Areas we wish to see improved – particular importance

- a) We feel there is a desperate need to state clearly that the creation of off-road forms of provision should never harm (inadvertently or otherwise) those who, for whatever reason, choose to exercise their right to remain on the road. This has been a particular problem locally with bus lane provision, which has been partially justified by the existence of a nearby cycle path. In practice, those who have remained on the road have been jeered at by those motorists who feel that cyclists “must” use the cycle path, and unsafe overtaking manoeuvres have resulted. This is known locally as the “Milton Road effect”³, where some motorists' impatience means cyclists are abused, harassed and in some cases even assaulted.
- b) We question the presence of the text “unless directed otherwise” under s. 4.3.8. As far as we are aware, cyclists always have the right to remain on the carriageway where a cycle track is provided. Please clarify what is meant here.
- c) Between sections 6.2 and 6.3 we would like to see discussion of what we would term “hybrid provision”, as mentioned in our comments on LTN1/04. These employ on-road cycle lanes but with a degree of segregation. We feel this form of provision would benefit both more and less experienced cyclists and would combine the best aspects of on-road and off-road provision.



St Cross Road⁴, Oxford: cyclists receive protection from traffic but can easily join or leave the cycle lane. The separators should probably be slightly less protruding, for safety reasons.



Århus, Denmark⁵: Cycle tracks merge smoothly with the road at minor junctions

- d) We are against the use of “bent-out” crossings (s. 8.1.2) and would instead stress the need for direct, straight paths. Where such paths cross side-roads, cyclists should not lose priority; motorists should have to wait, just as they would if cyclists were using an on-road cycle lane. This is common practice on the Continent, and should become the norm in the UK.

³ <http://www.camcycle.org.uk/newsletters/49/article8.html>

⁴ <http://www.camcycle.org.uk/newsletters/27/article7.html>

⁵ <http://www.camcycle.org.uk/newsletters/30/article11.html>

- e) The section on maintenance of tracks (s. 9.5.1) needs to be highlighted. This is a particular problem in Cambridge, which has a large number of such tracks, which are harder for maintenance vehicles to access. This is again an example of why cycle tracks can be an inherently problematic form of provision.

Areas we wish to see improved – other

- a) In general, we would like to see paths aim for a higher design speed than is currently generally the case.
- b) We feel the section on the effect on pedestrians (4.5) should be strengthened. We are unconvinced that “in most cases ... in a facility with sufficient width, safety and comfort will be unaffected”. In practice, many pedestrians may (often rightly) feel that their space is being invaded by the presence of cyclists.
- c) We feel that 3m is insufficient space for a pedestrian/cycle segregated path (s. 6.1.8).
- d) In general, we would wish to see avoidance of separating railings (s. 6.1). We suggest that 1.2m (s. 6.1.12) would anyway be too high given that smaller children may be using the facility.
- e) We feel that there are safety issues with some types of central white line (s. 6.1.16), which we have written about in our Newsletter⁶, where guidance has not been followed. An incorrectly installed lane can be particularly dangerous in wet weather.
- f) We suggest that the figures for recommended width (s. 6.2.3) be stated as “*minimum* recommended width”. Also, widths should be generous on bridges, where upward motion can be difficult and lead to cyclist instability.
- g) We suggest clarification that the usage rate of 200 cyclists per hour for shared use facilities (s. 6.2.4) presumably refers to peak hours.
- h) The importance of good sightlines (s. 9.2.1.) could be strengthened. In particular, the use of “may be adopted” should read “should be adopted”.
- i) The problems of dips in the profile of the path due to driveways should also be mentioned in s. 9.3.1, as it conflicts with the placing of bus stops mentioned here.
- j) A reminder that lamp posts and similar features should be outside the width of a cycle track would be welcome (s. 9.6 and 9.7).

We hope the above points are useful in finalising your draft, and hope you will give serious consideration to them.

Yours sincerely,
on behalf of Cambridge Cycling Campaign,

Martin Lucas-Smith
Co-ordinator

⁶ Newsletter 42, Cambridge Cycling Campaign: <http://www.camcycle.org.uk/newsletters/42/article9.html>