

**CAMCYCLE**



**Cambridge Cycling Campaign**

The Bike Depot  
140 Cowley Road  
Cambridge CB4 0DL

01223 690718

[contact@camcycle.org.uk](mailto:contact@camcycle.org.uk)

[www.camcycle.org.uk](http://www.camcycle.org.uk)

Jim O'Sullivan  
Chief Executive, Highways England  
1 Walnut Tree Close  
Guildford GU1 4LZ

November 4, 2019

Dear Mr O'Sullivan,

Camcycle is a volunteer-led charity with 1,400 members that works for more, better and safer cycling for all ages and abilities in the Cambridge region.

**Parliamentary Transport Committee – questions, Wednesday 23 October 2019 at 11:40am**

At this committee hearing, Daniel Zeichner MP (Lab, Cambridge) asked why Highways England did not follow its own standards as set out in IAN 195/16 (now substantially adopted as CD 195), which have formed a fully-fledged part of the Design Manual for Roads and Bridges, the overarching Highways England set of standards, since 2016.

We welcome your verbal response that Highways England is, in your own words, 'earnest in incorporating [the standard]' and that you wish to '[take] due accord of all vulnerable users'.

The clear intention behind both the interim and current standards is to deliver a step-change in provision for cycle traffic within schemes on the Strategic Highway Network because of the urgent need to promote and facilitate active travel. This is necessary to address important government policy and legislation surrounding issues of public health, climate change, congestion, road danger, social inclusion and air pollution and also in partial mitigation of the adverse impacts of road building.

At the committee hearing, Mr Zeichner referred to provisions proposed for cyclists, pedestrians and equestrians at the consultation stage of the A428 Black Cat to Caxton Gibbet improvement at Caxton Gibbet (please see the appendix to this letter for more details from our perspective). There are also similar issues to be found in other parts of the A428 proposed design as well as along the near-complete A14 Cambridge to Huntingdon Improvement Scheme.

From our own knowledge of the local circumstances, it appears that project managers for Highways England seem to have taken a very uncharitable reading of one clause in the scope section of CD 195. Unfortunately, they have chosen to interpret this clause to mean that they do not have to implement the CD 195 standards when designing shared-use paths. However, this reading is plainly and completely contrary to Highways England's own Cycling Strategy, which was published as long ago as January 2016, and would negate the entire purpose of the standards in the first place.

In your answer before the Committee, you indicated surprise that the standard has not been applied and you then appeared to suggest that it probably was followed. However, we have received communications from Highways England staff to the effect that neither the standards in CD 195 nor IAN 195/16 (at the time) were utilised.

At the committee hearing, you remarked in response to Mr Zeichner's question about consistency with cycle design standards that you would 'want to understand what consistent meant' and learn 'why it isn't consistent'.

Our view is that 'consistent' means that the infrastructure used for cycling meets or exceeds the safety, quality and effective design specifications found in CD 195. In other words, cycling on Highways England provided infrastructure should be safe, convenient and accessible for people of all ages and abilities. Whether you are 8 years old or 80 years old, whether you are riding a typical two-wheeler or a recumbent handcycle with adaptations for disability, the cycling infrastructure should be welcoming and easy to use. Drivers rightly expect consistent quality and safety from Highways England roads, and the same should be true for cycling infrastructure.

In order to understand why cycling provision has not been consistent with the standards, and how it may be remedied, we would like you to investigate the following points as a matter of urgency and provide us with clarification.

- a) Whether and where CD 195 (formerly IAN 195/16), 'Designing for cycle traffic', has been applied to the design and implementation of Highways England schemes, and the evidence you have to show this to be the case;
- b) In cases of cycle routes or potential cycle routes where CD 195 was not applied: the reasons why and the result of any safety audits that examined the cycling infrastructure;
- c) The remedial measures that Highways England will implement should it be found that the standard has not been complied with either in design or implementation (or both);
- d) What steps you, as Chief Executive, will undertake to ensure that CD 195 will be applied consistently and fully across the Highways England network to meet the needs of cycle traffic. This includes applying the standard fully without excluding the case of shared-use pathways, an exclusion which severely weakens the document and worsens safety for all road users; and,
- e) What steps you will undertake to direct a requirement for independent reviews of the initial, detailed and post-implementation design of all active travel infrastructure associated with planned and recently completed schemes on the Strategic Road Network? What will be done to carry out any necessary improvements in order to provide infrastructure that meets or exceeds Highways England's standards in order to provide safe and effective cycling provision?

We believe that cycling infrastructure fits into the overall walking, cycling and horseback-riding (WCHR) strategy as follows: where there are very low pedestrian flows, then the appropriate provision for cycling will be pathways parallel to and separate from the carriageway, designed in accordance with CD 195 as cycle tracks, which pedestrians or equestrians may legally use, as with any other road. Because cycle traffic is using these pathways, the CD 195 standard must be applied without exemption. In such conditions, CD 195 standards provide a safe and effective design for all vulnerable users. However, in places where there is sufficient pedestrian demand on these routes, then separate and dedicated footways should be provided alongside the cycle tracks.

We look forward to receiving your response, a copy of which will be forwarded to Daniel Zeichner and the Parliamentary Transport Committee.

Yours sincerely,  
On behalf of Camcycle

Matthew Danish,  
Trustee

cc: Ms Lilian Greenwood MP, Chair, Parliamentary Transport Committee.  
Mr Daniel Zeichner MP, Member for Cambridge.

### Appendix – comparing part of the A428 proposed design with the CD 195 standard

- Table E/3.26 specifies the minimum horizontal separation between carriageway and cycle track, which is largely not observed in the A428 scheme nor the A14 scheme. As a result, on the A14 scheme, lorries are using the pathways for parking and causing the surface to buckle in less than two years, creating significant safety hazards for cycling.
- Table E/4.1 specifies suitable types of cycle crossings for different situations, including roundabout entries and exits. In particular, it specifies that an unsignalised at-grade crossing must negotiate **no more than two lanes** for a roundabout entry, and **no more than one lane** for a roundabout exit, and in both cases this is only allowed for traffic levels up to 8,000 annual average daily traffic (AADT). Otherwise, the crossing must be grade-separated or signal controlled. The Caxton Gibbet roundabout design violates these constraints by forcing people to cross, at-grade, over three lanes of a roundabout entrance and two lanes of a roundabout exit, and in a place where traffic levels will undoubtedly be higher than 8,000 AADT. This is an extremely dangerous design.
- Paragraph E/4.7 specifies that crossings of minor side roads shall be of the bent-out or bent-in design. Paragraph E/4.16 further specifies that the bent-in design shall only be used for one-way cycle tracks. The A428 and A14 schemes only provide pathways for two-way cycle traffic, therefore only the bent-out design is permitted. Figure E/4.9N shows an indicative layout of a bent-out crossing. In all examined cases in the A428 and A14 schemes, either (a) the bent-out crossing design is not used at all or (b) the indicative layout of Figure E/4.9N is not followed.



A428 Caxton Gibbet proposed design

## Appendix – comparing part of the completed A14 scheme with the CD 195 standard



*Buckden Road / B1514 just east of the A1 junction (photos credit: Dan Burbridge)*

The four examples shown above are all places where two-way cycle tracks cross minor roads, however none uses the bent-out crossing design as described in the previous section.

All four photos show junctions that were recently widened by Highways England. This has increased the speed of turning motor traffic and therefore increased the risk of collision with cyclists and pedestrians trying to cross these minor roads. In particular, the lower-right photo shows a junction for a waste site used frequently by large lorries, which is now an even greater hazard than before, and more difficult to cross. These four junctions are closely spaced along a cycle route that is used by children cycling to school. Due to the widening of the junctions by the A14 scheme, this cycle route has been made significantly more dangerous.

These problems may be observed in numerous other places on the A428 and A14 schemes; further details can be provided upon request.