

Stakeholder Group comments

County Councillor George Potter

I wish to place on record my formal support for the latest proposed plans for an active travel scheme along the London Road from New Inn Lane to the Boxgrove roundabout. As the county councillor for two thirds of the route, and as borough councillor for the entire area in question, I have followed the scheme closely and been heavily involved in discussions and engagement throughout, and I am of the firm belief that progressing with the scheme will be of immense benefit to residents, the majority of whom will welcome the scheme.

I will be the first to state that Surrey County Council's initial handling of proposals for the scheme was inadequate, especially the announcement with just six week's notice of a proposed eight month closure of the main road in the area, and the lack of engagement with the local community on the specifics of the proposals.

However, I must also give credit where credit is due, and since the initial public backlash to the proposed road closure I have been very impressed by the concerted effort made by the team to remedy the initial mistakes through robust, detailed and extensive public engagement. All of the areas of genuine concern have been fully explored and addressed over the past 18 months. The prolonged daytime one way closure of London Road has been removed and replaced with a new schedule of works designed to avoid traffic disruption. Safety concerns around floating bus stops and narrow lane widths have been thoroughly, and independently, investigated and addressed. Stakeholders have been consulted and engaged with repeatedly to obtain their views on the scheme. Relevant Department of Transport guidance has been demonstrably followed, and the consultation with residents on the revised scheme was exemplary, including letters written to all residents, multiple public drop-in sessions, detailed designs available for examination, and even including virtual reality models of the scheme to allow people to examine the proposals from a first person perspective. The fruits of this labour have been the results of the consultation which showed that residents in the area are in favour of the scheme by a margin of 5:3, which is something reflected in conversations that I have had with residents myself over the past year.

But it is also worth remembering the reasons why this scheme is needed in the first place. Burpham is very fortunate to have many local amenities within a comfortable walking distance of almost all residents; ranging from supermarkets to independents shops to schools to green spaces to dentists. Unfortunately, however, Burpham is divided into four quarters by the busy traffic on the London Road, Clay Lane and New Inn Lane, and lacks any safe pedestrian routes to connect these four quarters together, meaning that many people feel unsafe to walk or cycle to the amenities that are in very easy distance of my house. Indeed, people have often lamented to me that they do not feel safe sending their children to make the 10 minute walk to their local primary school simply because it is too dangerous for them to cross the busy main roads. But this active travel scheme will fix that by creating widened footpaths along the London Road and introducing new controlled crossing points along the London Road and at all directions at the key roundabouts which currently split apart the local area.

Additionally, the scheme will bring major improvements to cyclist safety along a route which is officially a key cycle route (as well as a key transport corridor in the Local Plan) but which has been repeatedly identified as being dangerous and inadequate for cyclists in official reports such as the 2019 Guildford Cycle Routes Assessment. It has been well established, for years at this point, that the London Road is inadequate for cyclists, and this has been reinforced by high accident rates for cyclists on the road. Additionally, the Local Plan contains a site allocation for 1,800 new homes at the end of London Road, a planning application for which is expected in January, and it has long been clear in transport plans that the only way these houses can be accommodated is through increased active travel along the London Road. This proposed active travel scheme is therefore essential both for the safety of existing residents and for enabling the delivery of much needed housing.

No scheme will ever be perfect, and every scheme will always have its detractors. However, I have seen firsthand how the county council has bent over backwards to seriously consider, address and resolve every single legitimate concern that has been raised. From floating bus stops to travel times to lane widths to footpath widths, there has not been a single concern or objection raised which has not been carefully addressed. While a minority remain opposed to the scheme, the majority of residents are happy that the main initial cause of concern (the roadworks) have been fully addressed, and the only concerns still being raised by opponents of the scheme are either simply a belief that money shouldn't be spent on cyclists (which would mean a complete waste of the funding already secured and the money already invested in the scheme) or a refusal to believe that the multiple engineers and independent safety assessors involved have done their jobs properly.

By contrast, the scheme has the active support of myself as the main divisional member, the support of both borough ward councillors, the support of the local secondary school (where a student survey found that hundreds of pupils would want to cycle to school if the scheme went ahead), of the bus companies, of the emergency services, of parents and of cyclists, as well as the official support of the transport and planning policy team at Guildford Borough Council. Other groups that were originally opposed to the original proposals for the scheme, such as the Burpham Community Association and local business owners, are now neutral as a result of their concerns having been addressed.

The journey of this scheme has been far from easy, and there are undoubtedly lessons that can be learned from the uproar and public backlash the scheme drew at the beginning. But I can now safely say that the majority of residents in my community want the scheme, and that the scheme will be a major improvement to the safety of my community. From the parents who will now be able to walk their children to school and the park, to the cyclists who will no longer have to squeeze into narrow painted lanes next to lorries, to residents in the retirement flats who will now be able to safely cross the road to the local shops, this scheme will benefit the entire community. By contrast there is no longer anyone who will be inconvenienced by the scheme. The lanes are wide enough for motor vehicles, the pavements are wider for pedestrians and businesses will no longer face the loss of trade due to road closures during construction.

This scheme will also fit incredibly well with other work recently carried out by the county council, such as the Local Cycling and Walking Infrastructure Plan (LCWIP) and the launch of the Guildford ebike hire scheme, which will see docking bays located along the London Road.

To have come so far and to have done so much work would make it a tragedy were Surrey County Council to decide to now abandon the scheme, and to do so would also undermine

other key pieces of work which are all predicated on cycling and walking improvements taking place along the London Road.

No scheme will ever be perfect or without any detractors, but this is a good, carefully thought out, carefully considered scheme, which the majority of local people can either actively support or at least have no active objection to. Please make all the effort and engagement, by so many, worthwhile by going ahead with this scheme and improving the lives of people across the area which I am so privileged to represent.

George Abbot School

Tim Oliver OBE
Leader of Surrey County Council
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5 September 2024

Dear Mr Oliver,

Thank you for the invitation to the London Road Active Travel Stakeholder Group meeting next week. I shall be in attendance. Ahead of that, I wanted to write to reiterate the full support of George Abbot School for the full implementation of the A3100 active travel scheme from New Inn Lane to York Road, along London Road. I have read the full Arup technical review and note that this section is a vital distributor road between the A3 and all regions of our town. As such, it is vital to safeguard safe travel for all our users.

As you will recall from my previous letter of 5 December 2023, we have 2000 students and 205 staff; for this large community it is currently dangerous to cycle to George Abbot School utilising this stretch of the London Road. Indeed, I note that Arup confirm that cyclists currently using the A3100 carriageway have historically been disproportionately involved in collisions and are vulnerable to sustaining injury. This stretch of road serves one of the biggest schools in the country – we are in the top 10% of school sizes. It must be a priority to facilitate safe cycle ways for 2000 children in this area of our town. It is also a priority to facilitate greener travel approaches for a generation who are poised to make the seismic change necessary, to begin to reverse the environmental damage that we currently witness, worldwide.

I hope that Surrey will press ahead in pursuit of this project. Arup clearly states that two HGVs can pass each other safely without any impact on the small sections of shared use path. A number of pedestrians on this section of the road are students at our school and we will work with them to understand the principles of shared use, giving way and navigating the different way of using the public space. Young people are highly adaptable and more than capable of utilising the pathways safely. They will be supported in this, through the page of suggested measures offered by Arup (page 8 of the report), all of which we would fully support.

The findings of the Arup report are clear. Provision of the active travel scheme in this section of the London Road would result in a road that is safer and more accessible for children, pedestrians and cyclists travelling around Guildford, for now and in the future. As such, George Abbot restates our continued support for the project and our continued call for brave leadership from the council in this matter.

Kind regards,

A handwritten signature in black ink, appearing to be 'K. Carriett', written in a cursive style.

Kate Carriett
Headteacher

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7 October 2024

Dear Mr Oliver,

Thank you for inviting a submission from George Abbot School to be considered at Cabinet on 29 October 2024.

George Abbot School's Sustainability Policy recognises that climate change is fundamentally the largest, and most complicated socio-economic and environmental issue that humans have yet faced; this issue is going to need investment, ambition and change on an unprecedented scale. We note that Surrey's Climate Change Strategy sets a target for Surrey to become net-zero carbon by 2050.

George Abbot champions sustainable principles for students and recognises our role as vital educators in changing attitudes and raising ambition. George Abbot envisions a sustainable school community with climate justice and the protection of nature at its core. We want to minimise our impact on our local community and to coexist peacefully with our neighbours.

It is with this in mind that we have been part of the stakeholder engagement group for the London Road Active Travel Scheme which would run from New Inn Lane to Boxgrove roundabout on the A3100. We understand that any large infrastructure project inevitably creates some disruption during its construction phase and appreciate that this remains a concern for members of our local and school community. In this regard, we have also noted and appreciate SCC's plans to minimise this disruption.

The safety of our school and local community is a priority. We have therefore followed with close attention the concerns that have been raised regarding the width of the carriageway lanes and the safety of the short length of the scheme where 1.8 m widths are shared use paths. We have read the ARUP report of June 2024 which states that SCC's revised plan overcomes the former concern. The ARUP report also clearly states that provision of an active travel scheme in this section of the London Road would result in a road that is safer and more accessible for children, pedestrians and cyclists travelling around Guildford for now and the future.

It is without doubt that the provision of safer local infrastructure in support of sustainable travel in our community is fully in line with the school's work on sustainability and our recognition of the Climate Emergency. In fact, we recognise the potential impact that our 2000 strong student body alongside 215 members of staff transiting to and from school daily has in terms of contributing locally to congestion and air pollution as well as globally to climate change. It is therefore a moral imperative for us to support any project, deemed safe and effective, which works to guide our community on a more sustainable pathway.

As we see it, the potential benefits for our school and local community from this project are great. In addition to a reduction in cyclist vulnerability along the London Road, a modal shift, however small, will have positive impacts on air pollution and congestion - with associated benefits for the local economy. Students, staff and others who cycle will experience the physical and mental health

Guildford Borough Council

Ahead of the Cabinet Member decision on whether to proceed with the New Inn Lane to Boxgrove Roundabout section of the London Road, Burpham - Active Travel Scheme, Guildford Borough Council (GBC) would like to reiterate our stance on the scheme.

The proposals for the scheme align well with both national and local priorities. Nationally, the proposals align with the Department for Transport's 'Gear Change – A bold vision for walking and cycling' and 'Decarbonising Transport – A Better, Greener Britain'. Likewise, the proposals align with SCC's Local Transport Plan 4 (LTP4) which sets out a clear sustainable travel hierarchy, giving priority to the least polluting modes of transport. In relation to the 'active travel and personal mobility' policy area, the policy statement advocates for:

“The prioritisation of walking and cycling over less sustainable modes, as in the sustainable travel hierarchy through the delivery of facilities which make active travel (for example on foot, by bicycle, scootering) more convenient, pleasant, and safe. This will enable more active journeys, bringing many transport, health and environmental benefits. Such facilities include an integrated and high-quality network of cycle routes and footpaths across the county, segregated from general traffic wherever possible. Elsewhere roads can be made more people-friendly through better design, giving more space to active travel modes, and lowering speed limits where appropriate.”

In terms of alignment with GBC policy, within our new Corporate Plan 2024-34, Priority 1 states our ambition to become '[a] more sustainable borough', with the following outcomes:

- We are a carbon neutral council by 2030 and the wider borough is net zero by 2050
- Cleaner air that supports the health and wellbeing of residents and visitors

One of the ways we will achieve this outcome is by “[s]upport[ing] the delivery of the routes and infrastructure which make up the Local Cycling and Walking Infrastructure Plan, in order to increase and improve opportunities for sustainable transport.”

Likewise, we have an adopted Climate Change Action Plan with an action to “[s]upport SCC to develop and implement a Guildford Local Cycling and Walking Infrastructure Plan for a network of walking and cycling routes across Guildford Borough, ensuring a high-quality network of routes which accommodate a variety of users.” The relationship between the scheme and the Local Cycling and Walking Infrastructure Plan is detailed further below.

There is established scheme precedent, with a proposal for pedestrian and cycle improvements along the section of A3100 London Road between the Boxgrove Roundabout and York Road junction included in SCC's Town Centre Transport Package (TCTP), which went through consultation in 2015. GBC have supported this objective through support of the TCTP.

The scheme would partially realise the walking and cycling elements of 'Scheme SMC6' in the Infrastructure Schedule of the Local Plan: Strategy and Sites (2015-2034) (LPSS). The Sustainable Movement Corridor is intended to provide a priority pathway through the urban area of Guildford for buses, pedestrians and cyclists, serving existing and new communities. The proposals are adjacent to Gosden Hill Farm, allocated as a strategic site in the LPSS.

The GBC Strategic Development Framework Supplementary Planning Document highlights the key active travel connections between Gosden Hill Farm and the communities of Burpham and Merrow, including along the A3100 London Road.

The proposed connections are included in the mapped network for 'Policy ID10: Delivering a Comprehensive Guildford Borough Cycle Network' as part of GBC's Local Plan: Development Management Policies. The mapped network, now adopted into the Policies Map, shows London Road as a primary route.

The recently endorsed Guildford Borough Local Cycling and Walking Infrastructure Plan, a partnership piece of work, has utilised this foundation and includes the A3100 London Road in the network plan. The section of London Road between the Upper High Street and York Road is a Phase 1 scheme which is intended to link into the wider A3100 London Road scheme. At the time of LCWIP development this was proceeding.

As such, whilst the County Council appears to have declined to proceed with other funded sections of the London Road scheme, discussions will necessarily continue between GBC, SCC and the developer of the Gosden Hill Farm site to ensure the appropriate mitigation is provided to make the forthcoming proposals acceptable in planning terms. Policy ID9 and the LCWIP will be used to guide these discussions. Therefore, enhancements to walking and cycling infrastructure may still need to come forward, as part of this development proposal.

To conclude, the notion of pedestrian and cycle improvements to the London Road corridor is one that has been subject to consultation, debated, and adopted into policy. There now appears to be technical evidence to its suitability and it is hoped that the Highway Authority will now agree to proceed with the New Inn Lane to Boxgrove Roundabout proposals.

London Road Action Group

Introduction/Executive Summary

This paper has been compiled in response to a Technical Paper by Arup Professional Services commissioned by Surrey County Council to look at safety issues in Section 1 of the Active Travel Scheme for London Road in Guildford specifically related the adequacy of carriageway widths (given the existing volumes of traffic), and to shared use paths being restricted in width through limitations imposed by the availability of land within the highway boundary.

It is disappointing that SCC thought it adequate to address serious safety concerns by seeking a desktop exercise only, given that the reasons for the review were due to expressions of public concern, in the interpretations of the design guidance. It is equally disappointing that the exercise conducted by Arup considered only the data provided by SCC Highways and accepted that without question.

It is not surprising, therefore, that – given the same incomplete information was assessed - similar conclusions were reached. The real world is very different from the theoretic world assessed in the Arup Report – and real world conditions outweigh any argument that the active travel scheme will improve the safety of *any* users of London Road.

Even in the theoretic world the Arup Report has many inadequacies, in that it has not researched current guidance at the time of publication; it fails to address the most up to date advice from Active Travel England; it omits consideration of their policies, their desire for achieving best practice and their commitment to work with local authorities which we note has not been reciprocated by SCC.

The Tasking of Arup by SCC

Without access to the actual terms of the task set by SCC for Arup, it is only possible to comment on what Arup achieved. However, in noting the text of the Leader's Decision, it seems that the review was narrower than it ought to have been. It says:

“... subject to further design review informed by comments received through the engagement to ensure that the scheme considers the needs of **all** road users...”

There is nothing of significance in Arup's report that properly investigates the effects on traffic flow, balked by in-carriageway bus stops, leading to potentially increased congestion, associated pollution, and the creation of rat-running through side streets.

The effect on those users of London Road, who would not have an option of active travel, has been overlooked.

Accuracy and Adequacy of Research

The following sections, because of the limitations of the task set, concentrates on what Arup achieved.

Data Used

- Arup quotes accident statistics that use data including Boxgrove and New Inn Lane roundabouts. The inclusion of the roundabouts was not relevant to this review of Section 1, and data was readily available that referred only to the safety of London Road itself, as is the subject of the report. ¹
 - **This showed either a lack of awareness on the part of the reviewer, or that he/she had been misled.**
2. Arup states: “SCC advises that the scheme relies on the availability of land within the highway boundary.” “However, SCC has reviewed the scheme and is now of the view that it will be feasible to maintain the carriageway width at 6.5m, thus overcoming this concern.”

There are several places along the route of Section 1, where drawings made available during public review indicate that carriageway widths were less than 6.5m. The assertion from SCC that this has been addressed has gone unremarked by Arup, but no evidence has been reported of a review of the effects of such amendments compared to previously publicly presented drawings.

- **Unless there have been purchases of land bordering the highway in these locations, this can only further exacerbate the narrowness of any adjacent shared path².**

Available Current Guidance

There is concern that the current proposals have not been reassessed using the Active Travel England Route Check User Manual, published in February 2024, prior to the setting of the Arup tasking. Given the text contained therein, and concerns expressed by a Commons Select Committee, it is interpreted that this publication is to ensure that all future schemes are compliant with the objectives set for Active Travel England, as agents of the Department for Transport. The expression of concern by the CSC appears to have emanated from the many schemes throughout the country that have been ridiculed and forced to be amended or withdrawn. The expenditure of £2.3 billion has not been properly accounted for, because of inadequate oversight.³

In spite of the publication of this latest guidance, seemingly based on learned experience of the inadequacies of the implementation of several cycling facilities in other parts of the country, SCC have gone so far as to dismiss reference to this latest document and to deny its relevance.⁴

Why is the Active Travel England Route Check User Manual Relevant?

According to its introduction, the Active Travel England Route Check User Manual is intended for use throughout the scheme design process in order to identify critical issues and other problems at the feasibility stage and design them out in later stages before construction.⁵ It states:

“A key design principle listed on page 21 of Gear Change is that “cyclists must be separated from pedestrians”. LTN 1/20 builds on this on pages 9 and 67 and states that “in general, shared use facilities in streets with high pedestrian or cyclist flows should not be used and, in urban areas, the conversion of a footway to shared use should be regarded as a last resort”.

The Manual also clearly makes the point that it is not intended as a theoretical approach to fitting facilities into limited available space:

“... it also accounts for the **user experience** of people walking and wheeling, including people with disabilities.”

Effect of Arup’s Failure to Assess Against Route Check Manual Guidance

By failing to assess SCC’s scheme against the latest guidance material, Arup have overlooked some fundamental tenets of ATE’s Policies and Best Practice.

ATE Policies

PO01. Are cyclists separated from pedestrians?

PO03. Does the route feel direct, logical and intuitive to understand for all road users?

PO06. Does the route join together, or join other facilities together, as part of a holistic, connected network?

PO01. Are cyclists separated from pedestrians?

According to Surrey County Council 45% of the cycle route in Section 1 is shared with pedestrians.⁶ The reason for ATE placing this policy as their No 1 issue is, as they state:

“Shared-use provision affects the attractiveness and desirability of the route, particularly for pedestrians and people with disabilities.”

This is a strong opinion, factually-based on research carried out by ATE’s Director of Inspection, when reviewing the effectiveness of the London Cycle Network.⁷ He concludes:

- *“a local authority focus on mixing cyclists with pedestrians on footways serves to reduce the propensity to cycle”*
- *“... doing something that is well meaning but misguided for cycling seems to reduce the propensity to cycle beyond the ‘do nothing’ scenario”*

Notwithstanding any debate about the scale of usage by pedestrians and cyclists, this guidance is powerful, from both the safety and economic standpoints. It was a crux matter highlighted by the “user experience” of the local population, particularly with the increasing use of e-bikes, electric scooters and cargo bikes.

The extensive use of shared paths has been inadequately addressed in Arup’s report, in failing to understand their effects do not increase the propensity for cycling.

2. PO03. Does the route feel direct, logical and intuitive to understand for ALL road users?

The Cyclist Perspective

The aim of the introduction of enhanced cycling facilities is to treat cyclists as vehicles. On all occasions, where they are forced to share paths with pedestrians, they are not being treated as such, because they have to follow the pedestrian route. Interruptions to smooth flow at uncontrolled junctions occur because the shared path does not follow the direct course of vehicular traffic.

This interruption to directness also happens at all bus stops, whether they are called floating bus stops, bus stop bypasses or merely a transition from a dedicated, segregated track to a

shared one. Pedestrians waiting, alighting or disembarking create a hazard to a direct route and interfere with progress.

The Pedestrian Perspective

Apart from the above-mentioned issue at bus stops, there are many videos online which demonstrate the hazards experienced by pedestrians, both able-bodied and with disabilities, of fast travelling cyclists badly negotiating mixed user scenarios. Learned experience over many years has created an intuitive expectation for public transport

users that crossing to and from a footway only requires awareness of other pedestrians, and a lack of expectation of cyclists on what was, hitherto, a footway.

Collisions may result, which, though not necessarily causing serious injury or death, can be extremely debilitating. Unlike all collisions involving vehicles, there is no legal requirement to report cycling incidents, and statistics about pedestrian/cyclist collision rates are potentially unreliable as a result.

Recent observations in the City of York (reinforcing user experience alongside Stoke Park) have demonstrated that whereas there is an intuitive understanding by pedestrians of the boundaries between vehicular traffic and footways, the definition of separation between cyclists and pedestrians is so weak that meandering is prevalent. Numerous occasions were observed, even on supposedly segregated tracks, when passing cyclists caused startle, because pedestrians were in the incorrect lane. Clearly this effect would be greater when shared paths were present.

The Motorist Perspective

A belief exists that once a dedicated, kerbed cycle track exists outside the carriageway boundary then the required Highway Code separation of 1.5 metres for a motorist to pass a cyclist is no longer applicable. Despite repeated attempts to obtain clarification on the interpretation of the Highway Code, the matter has been steadfastly ignored by DfT. RoSPA suggested that for the comfort of cyclists the required 1.5 metres should continue to be observed. This logic of continuing to achieve the required space is unlikely to be inferred by motorists, since the cyclist does not share the same carriageway space, and the hazard to cyclists from vehicles in close proximity on 3.25 metre carriageways beside cycle tracks with no buffer zone, will continue.

The 6.5 metre road width for private vehicles may be adequate, but for HGVs and coaches a narrow gap between mirrors (assessed by Arup as 170mm), at permitted closing speeds up to 60mph, has the potential for “kerb-hugging”, further discomfoting pedestrians and

cyclists. According to the Chartered Institution of Highways & Transportation (CIHT) the separation for all passing vehicles should be 0.75 – 1.0 metres.⁸

The route does not feel direct, logical and intuitive to understand for ANY road user.

3. PO06. Does the route join together, or join other facilities together, as part of a holistic, connected network?

With the cancellation of Section 3, the isolated Section 1 does not directly join with any other network, and so fails the test of being: “a key part of rolling out high-quality walking, wheeling and cycling infrastructure in line with local LCWIPs and national ambitions. New infrastructure that connects to existing routes and desirable destinations is more likely to be used and will return more benefits on investment.”

It will not return a benefit on investment.

Interpretation and Implementation of Best Practice

Much of the content of Arup’s report reads as a review of the development of the standards published in LTN 1/20. It attempts to justify SCC’s design by indicating that where possible it meets Absolute Minimum Standards, and where it doesn’t there may be leniency. This kind of approach invokes an expectation of near-perfect human performance, and makes no allowance for human error.

Anyone with experience of working in environments that demand assessments of safety risks, will recognise that it is essential that margins are incorporated to make allowance for human behaviour and ability. Allowances have to be built in to allow for human error, whether inadvertent or deliberate. The extent of these margins depends on the outcome of any hazard.

1. Road Widths

Arup reports: “The scheme runs along an A-road and the Department for Transport refers to A-roads as major roads intended to provide large-scale transport links within or between areas. In practice, the A3100 functions as a distributor road between the A3, suburban areas and Guildford town centre.” “UK practice has generally adopted a standard lane width of 3.65m ...” but SCC have declared that, despite the purpose of the A3100 as an arterial route to and from the A3, and notwithstanding the volume of traffic it supports, it may be declared as a “**Type 1(b) – Avenue**”⁹, justifying its standard lane width to be reduced to 3.25 metres.

Even in its existing state the A3100 from New Inn Lane to Boxgrove is compromised by highway width constraints, and does not fully meet either the standard (best practice) 3.65 metres in places, or even 3.25 metres in some places. If a consistent carriageway width of 6.5 metres is to be imposed, then the design of specific cycle tracks alongside need to compensate by offering widths that employ best practice. It may be noted that in the more appropriate accident statistics for the scope of the report, the current cycle lane design has resulted in only 1 serious injury to a cyclist in 10 years.

2. Cycling and Walking Facilities incorporating Best Practice

LTN 1/20 declares 2 levels of standard for widths for the design of cycle tracks and footways – a Desirable or Recommended Minimum and an Absolute Minimum. It has to be inferred that the former standard defines best practice, and that only where this is not achievable should designs resort to an Absolute Minimum (i.e. “absolute” should mean no further reduction in standard.)

As previously highlighted, when assessing risk, the use of Absolute Minimum standards should only be contemplated where other protective margins exist, and a series of combinations of Absolute Minimum standards make no allowance for sub-optimal human performance.

Examples where Lack of Best Practice has not been fully Justified by Arup 3.

Buffer Zones

Best practice suggests a separation of 0.5 metres between carriageway and cycle track. SCC has not incorporated a buffer zone anywhere on the route. **Arup makes no mention.**

4. Segregated Cycle Track

Best practice suggests a width of 2.0 metres, but even in the 55% of the route that is not shared, the design by SCC fails to achieve this figure in numerous areas. Where this shortcoming exists, as mentioned above, there is no compensating buffer. **Arup makes no mention.**

5. Shared Pedestrian and Cycle Tracks

All relevant guidance documents acknowledge that facilities that require pedestrians and cyclists to share the same space “must/should” (the term used depends on the source quoted) only be created as a last resort. This statement clearly exemplifies shared usage

is a shortfall from best practice. There is no compensating buffer on any shared use track, **again not mentioned by Arup.**

If, in order to provide route continuity, the “last resort” of shared space becomes necessary, then best practice recommends 3.0 metres width, for up to 300 cyclists per hour. [Note that this does not say “at least 300 cyclists per hour”, so it covers from 1 to 300.]

Shared space allows for bi-directional movement of pedestrians, even if cycling is deemed uni-directional. [However, many local users observe frequent, illegal cycling on pavements along the route on sides opposite to normal traffic flow].

Further reduction of recommended width for shared use tracks is deemed acceptable by Arup, based on low pedestrian and cyclist usage. This logic runs counter to the guidance from ATE that: “Shared-use provision affects the attractiveness and desirability of the route, particularly for pedestrians and people with disabilities.” **The**

Arup conclusion seems to refute the entire purpose of encouraging greater active travel.

6. The Highway Code Conundrum

Despite several enquiries to many different addresses, no answer could be obtained about the policy, rationale or reason for the Highway Code to declare:

Rule 64: You **MUST NOT** cycle on a pavement.

It can only be inferred that this recognises there is a risk to pedestrians from cyclists. Yet when shared tracks exist, without any demarcation between users, it remains defined as a cycle track and cyclists have the right to cycle amongst pedestrians – Rule 62.

Recent legal cases involving collisions between cyclists and pedestrians have highlighted that there is a lack of law to cover a cyclist’s duty of care. A local authority, being made aware of the highlighted risks to pedestrians, needs to proceed with caution when transferring a perceived risk to cyclists in carriageways, to a risk to pedestrians in shared tracks.

Conclusion

As highlighted in the foregoing, the apparent mindset of the Arup report author reflects that of the SCC designers, and the report reads more as a theoretical justification of the project, rather than a critical analysis, involving local, real-world experience.

Furthermore, it relies heavily on earlier guidance (LTN 1/20) that has led to strong criticism in government about its effectiveness of increasing active travel. It has not taken into account the need for considering the latest publication with amplified policies and applying best practice.

The A3100 London Road between New Inn Lane and Boxgrove is too limited in highway space (in places) to permit the incorporation of best practice designs of cycling facilities, without severely compromising user safety below current standards. Also, the need to make use of such extensive sections of shared paths does not increase the propensity for increasing cycling.

Arup has exhibited a lack of acknowledgment of the latest published guidance, or the need for adherence to it. The ATE Route Manual has all the hallmarks of having been based on experience of failed or compromised cycling schemes in other parts of the country.

An abandonment or comprehensive rethink is required.

Embedded Details

1 Table to show accidents and casualties on A3100 London Road, Burpham, excluding the Boxgrove Roundabout and the New Inn Roundabout, from 2012 to 2022 inclusive. (Taken from London Road, Burpham - Active Travel Scheme - Surrey County Council (surreycc.gov.uk))

Year	Total accidents	Serious accidents	Total casualties	Serious casualties	Total cyclist accidents	Total cyclist casualties	Total serious cyclist accidents
2012	3	0	4	0	1	1	0
2013	5	0	8	0	2	2	0
2014	7	2	14	2	1	1	0
2015	3	1	4	1	0	0	0
2016	2	1	4	1	1	1	1
2017	8	2	8	2	3	3	0
2018	4	1	7	1	1	1	0
2019	2	0	2	0	1	2	0

2020	0	0	0	0	0	0	0
2021	3	0	3	0	1	1	0
2022	4	0	5	0	2	2	0
Totals	41	7	59	7	13	14	1

2 Examples of Pinch-points

Example 1

One of the main areas of concern, as clearly stated at several is the narrow part of the road (adjacent to Windy Cottage). Highway space is actually less opposite The Emporia.

It also includes a bend with sufficient curvature to increase the swept path of all vehicles considerably.

Any conclusion which ignores this is missing the point.

The information in Table 1 below which was collected in 2022. It is still current and easily verifiable.

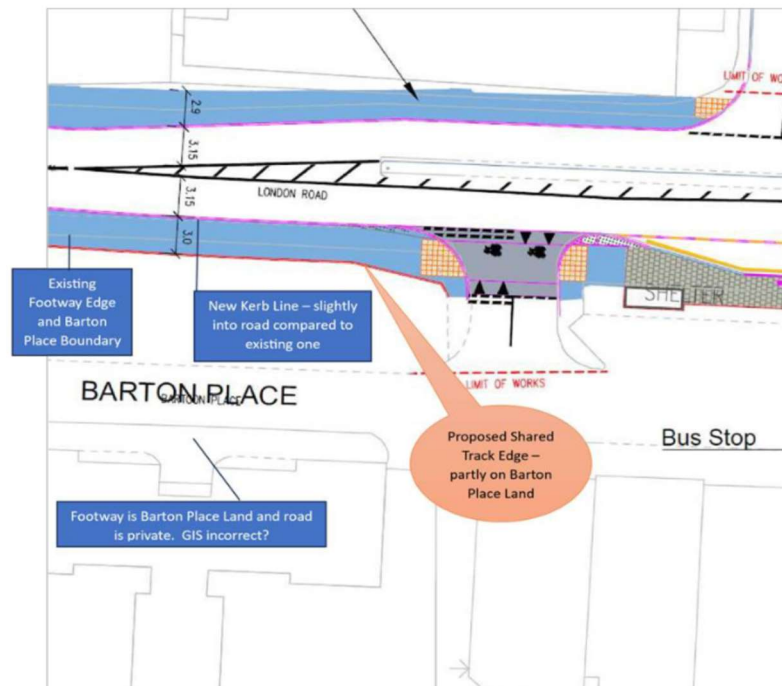
Table 1: Dimensions of London Road adjacent to Windy Cottage looking 'southbound' i.e., towards Guildford

Publicly accessible land with foot/cycle path	Wall	Foot path	Cycle lane	'Northbound' Carriageway	White 'Centre' Line	'Southbound' Carriageway towards Guildford	Cycle Lane	Foot path	Windy Cottage
		1.54m	1.0m	3.3m	0.1m	2.9m	0.73m	1.5m	

Watching bus and lorry traffic it is clear that with the current road width, particularly southbound, maintaining a course such that the wing mirrors between the cycle lane and the 'centre' line leaves minimal clearance on the straight parts of the road and is physically impossible on bends. Most vehicles cross both lines when negotiating the bend approaching the first Abbotswood junction. Even northbound there is very little clearance.

Example 2

Barton Place (part of Land Registry title SY 173174) appears already to have been subsumed to create a shared path, though latest check of Land Registry shows no transfer of title, or part thereof.



3 Recommendations of the Commons Select Committee report of November 2023, which states:

Despite spending over £2.3 billion on active travel infrastructure between 2016 and 2021, DfT knows far too little about what this spending has achieved. To properly protect taxpayers' money, and make sure future spending decisions are fully informed, DfT needs

to do much more work to improve the evaluation of active travel schemes and how the delivery of cross-government benefits from active travel, including health benefits, are identified, tracked and communicated. Public concerns around safety remain a barrier to more people taking up active travel.

4 SCC stated in an email on 15 April 2024, when asked about working with ATE and its current guidance:

- Active Travel England Route Check User Manual – This tool was recently published and is for used (sic) to evaluate new schemes as part of the bidding process to ATE. We undertook an (sic) route check audit at the time of the bid using a predecessor to the route check tool provided by ATE as part of the bid.

5 1.2 The Route Check is used by ATE for assessing the design quality of linear schemes. However, it may also be used by local authorities and others wishing to assess the design quality of schemes against ATE’s quality criteria.

1.3 When ATE uses the Route Check to assess the design quality of active travel infrastructure, the main goal is not to pass or fail schemes. Rather, its primary purpose is to remind designers of key active travel policies, promote best practice and prompt discussions about design solutions.

1.4 The Route Check is also intended for use throughout the scheme design process, meaning that you can identify critical issues and other problems at the feasibility stage and design them out in later stages before construction.

6 London Road, Burpham - Active Travel Scheme - Surrey County Council
(surreycc.gov.uk)

7 Cycling infrastructure in London (cycling-embassy.org.uk)

8 Section Three.pdf (ciht.org.uk)

Guildford Bike User Group

G-Bug's final comments on the London Road Active Travel Scheme are as below :

- Guildford current and future cyclists want this scheme to go ahead so that cycling along London Road is safer please

- The Arup Report concludes that the road width of 6.5m is not a concern for HGVs to pass each other. There will also be no more conflict between vehicles and bikes on the carriageway, a bonus for local drivers.

- The Arup report states that shared use paths for stretches are acceptable, which GBug fully supports and we recommend some 'Share with Care' signage and road markings along the shared sections.

- Surrey Police had no records of any injuries from the shared use paths on London Road for the last 5 years. In the whole of Surrey, there were only 3 pedestrians injured by a bicycle in 2022 [Source Fol request to Surrey Police]. The dangers are not from bicycles, The danger to pedestrians is from cars, 3,600 pedestrians in Surrey were killed or seriously injured in 2023.

- At the Stakeholder meeting concerns were raised about the Shared Use sections of cycle path by Yasmine Broome regarding possible conflict between the visually impaired and disabled people. Gbug replied that cyclists would respect wheelchairs and visually impaired people with a white stick and take more care. Again we stress that shared use paths are working safely all over the country.

- Guildford BC want this scheme especially as they need the Sustainable Movement Corridor for the Gosden Hill Farm site, I refer you to their letter dated 11th Sept 2024.

- Guildford Cycle Route Assessments Report May 2020 includes the scheme in the Cycle Network.
- SCC's consultation survey showed a clear majority with 50% in favour of the scheme and 20% against

- SCC have spent approx. £1m on this scheme so far please ensure it goes ahead

- Local schools and Emergency services fully support the scheme - their is demonstrably widespread and broad support.

- The new Bikeshare scheme with Beryl Bikes in Guildford needs this scheme to go ahead - £1m investment from SCC, but then no improvements for cycling options for Guildford residents.

- The 35 cyclists injured along the London Road in the last ten years want this scheme, cyclists are 1% of the traffic but 30% of the accidents, this is a dangerous road please make it safer! These 35 casualties have cost Surrey £939,400. source: <https://mycouncil.surreycc.gov.uk/documents/s81642/Cabinet%20Report%20Safety%20Camera%20Policy.pdf>]

The only people opposed to this scheme are local car drivers acting 'conservatively with a small c' resisting any changes to their neighbourhood. These days it is far too easy to object and block any forward progress with negative comments. Now is the time to move forward, no more filibustering from the opposition please, let's get on and build this, and many more, Active Travel Schemes such that Guildford becomes a safer place. G-Bug – The Guildford Cycle Campaign www.g-bug.org

Oliver Greaves

Background

This note has been prepared ahead of the Stakeholder meeting on 11 September 2024, at which Section 1 of the contemplated A3100 Active Travel Scheme will be discussed.

This follows the decision taken on 27 February 2024 by Surrey County Council (“SCC”) to

“Defer a decision on Section 1 subject to further design review informed by comments received through the engagement to ensure that the scheme considers the needs of all road users, with further consideration to be given by the Leader at a future date.”

SCC have circulated a report prepared by ARUP dated 7 June 2024 and said it is intended to inform the final recommendations for the Cabinet Member Decision meeting on 24th September 2024.

Most Issues Have Not Been Addressed And Were Outside The Scope of ARUP’s Report

ARUP’s report does not assess the scope set out in the Leader Decision. Instead, it has a very limited scope, as it sets out in 1.2 of the report – assessing only one specific concern (a
er SCC had decided lane widths and potential for conflicts did not need to be reviewed by ARUP):

“ (ii) The safety of the short length of the scheme where constraints mean that 1.8m width shared use paths are proposed.”

Importantly, the report does not assess the needs of all road users and there are 12 significant areas that we believe remain outstanding (set out below).

Conclusion

As well as the outstanding areas, the ARUP report indicates much lower cycling usage levels than originally advised by SCC as a justification for the overall scheme. ARUP counted an average of 57 from 7am-7pm vs 230 a day originally communicated by SCC.

Therefore we believe a full economic appraisal using the Active Mode Appraisal Toolkit needs to be undertaken to see if Section 1 s II meets the criteria. This would be in line with the UK Government approach, who published in February 2024 that schemes above £750,000 should submit a full economic appraisal, in response to Parliamentary concerns over poor value for

money of ATE schemes. ARUP's count equates to annual benefit of only £1,780 from 7am-7pm (assuming original % increase), which surely cannot justify a c.£1.5-2m+ investment.

We therefore do not see how it is possible to proceed with Section 1 at the 24 September Cabinet meeting, and in absence of the outstanding issues being addressed, or the decision deferred again pending their resolution, Section 1 needs to be cancelled.

Major Issues Not Addressed

Annex I to the Decision Report of 27 February highlighted a number of issues, notably:

“significant concerns about the scheme's feasibility, questioning the justification for its implementation and highlighting fears of increased congestion and compromised safety. Key issues include:

- Space and safety: Scepticism about whether the design can safely accommodate the intended benefits, especially concerning shared pathways and crossings.
- Impact on local residents and traffic: Worries about construction disruptions, the long-term effects on local traffic flow, and the scheme's potential to worsen air quality.
- Questioning the need: A strong sentiment that existing infrastructure is adequate or that improvements could be achieved through simpler, less intrusive measures.”

We believe the following should have been conducted in addition to the ARUP report:

- 1) Study specifically addressing the needs of motorists. Motorists are the main users of Section 1 and their needs have not been assessed
- 2) Revised traffic modelling to assess the impact of the Section 1 now that Section 3 has been cancelled. Congestion was a very significant concern. With a more limited route, the extent of diversions is likely to be different to that originally presented

-
- 3) Air pollution and greenhouse gases study. Pollution was frequently raised as a concern during the engagement, no report has been produced and added congestion is likely to lead to worse air quality and more greenhouse gas emissions.

 - 4) Updated analysis on scheme usage. ARUP's report indicates a significantly lower level of cycling than the figures originally anticipated by SCC. The daily levels indicate it is only c.25% of figures previously provided. This highlights serious questions over whether the prospective benefits still justify the impact

 - 5) Updated cost benefit analysis. A full economic appraisal using the Active Mode Appraisal Toolkit to see if Section 1 meets the criteria. There have been significant changes to the scheme since first considered and value for money was a significant concern in the original engagement. On 14 February 2024 the UK Government said schemes above £750,000 should submit a full economic appraisal, in response to Parliamentary concerns over poor value for money of ATE schemes

 - 6) Analysis of revised design v Active Travel England guidelines. Active Travel England states its Route Check is intended for use throughout the Scheme Design process

 - 7) Analysis on pedestrian impact for Section 1 as a whole. ARUP were not instructed to assess this. The prior engagement noted significant concerns from pedestrians about the proposed shared cycle/pavements. ARUP frequently note best practice is not being followed for Pedestrians due to space constraints

 - 8) Specific dynamics surrounding school children. Most of the pedestrians are unaccompanied school children. Given they commonly walk in groups, often looking at their phones, this introduces a significant factor about behaviour and suitability of design. SCC also expected many of the new cyclists to be school children, who are less experienced. Whilst ARUP have talked about specific groups such as wheelchair users, they failed to include a detailed discussion about this topic

 - 9) Bus stop impact. A major concern about the delays caused by buses needing to slow and stop in the carriageway rather than pull off to the side has not been addressed or assessed

 - 10) Analysis covering local impact, including disruption. Residents and local businesses voiced numerous complaints which need to be considered. This should cover both the long

term and the anticipated disruption (including congestion and diversion routes). The expected Gosden Hill development nearby is likely to significantly increase the traffic along the route and should be evaluated

11) Alternatives to Section 1. Part of the rationale frequently expressed by SCC was the importance of a continuous cycle lane into central Guildford. With Section 3 cancelled this is no longer the case. Alternative routes or designs may now therefore be better

12) Detailed assessment of impact of road narrowing. ARUP's report contains errors and highly questionable assertions about safety of separation distances between HGVs and the kerb. We do not believe 170mm between HGVs and 125mm from an HGV to a pedestrian/cyclist is fine, but dangerously close. Hence it seems strange this point was not considered in much greater depth by SCC, given the potential for accidents, delays and the section no longer being fit for the needs of all road users

Surrey Coalition of Disabled People.

Wednesday 18th September 2024

Dear Tim,

We are strongly opposing the proposals of the London Road Active Travel Scheme to build shared spaces at bus stops and on the pavement in Burpham. Blind, visually impaired, disabled, older and vulnerable bus passengers should be able to get on and off the bus independently directly from/to the pavement as they have always done. They should not have to cross cycle lanes or step into a cycle lane to get on and off a bus.

Active travel schemes have and are being introduced across the UK to accommodate cycle lanes, with many schemes that include changes to existing bus stops. This is where the bus stop is separated from the pavement by cycle lanes, which runs in-between the pavement and the bus stop.

There are two key designs:

- Floating bus stops where bus passengers have to cross a cycle lane to a bus island to catch the bus
- Shared use bus boarders / Copenhagen bus stops are where bus passengers have to step into a live cycle lane to get on and off the bus

-
- There are also a number of variations of designs with new ones like at Lea Bridge in Hackney now turning the pavement into a cycle lane at the bus stop, where the pavement disappears, and pedestrians have to cross the cycle lane onto the bus boarder, in order just to walk up the pavement.

These designs are not safe or accessible for blind, visually impaired, older and many vulnerable groups of bus passengers and they never will be. They create a new barrier to accessing public transport independently and we're against these being introduced in Surrey.

In Denmark the injuries to bus passengers caused by cyclists went up from 5 to 73 after the Copenhagen style bus stop design was introduced¹ and in 2016 a Copenhagen style bus stop was removed in Islington in London as it did not take into account the safety and accessibility needs of blind and visually impaired bus passengers, as explained in Appendix A

In 2014, a report by Arriva the bus company stated that 40% of drivers had witnessed passengers being hit by cyclists and 88% had witnessed passengers having near misses with cyclist at bus stops with cycle lanes.

Transport for London (TfL)'s own research into the matter — commissioned by Mayor of London Sadiq Khan in March found that during 2020, 2021 and 2022, five pedestrian casualties involving cyclists and one involving an e-scooter occurred within the extent of the bus stop bypass, based on the collision descriptions. One of the six appears to have been at the designated zebra crossing, as far as we can tell from the collision descriptions. Three of the five pedestrian casualties involving cyclists were serious and two were slight. The pedestrian casualty involving an e-scooter rider was slight ³

Although the data shows a small number of people, that have been injured at a shared space bus stop, we are concerned that other incidents took place that weren't necessarily reported. In the same report recording 24 hours of rush hour video at eight sites — found that 60 per cent of cyclists did not stop to let pedestrians cross at floating bus stops with zebra crossings.³ Imagine how many Disabled people could have been injured!

Please find below an example of a bus user that has been hit by cyclists at bus stops reported in the press and on social media:

In July 2014 Emma Wex was hurt badly as she attempted to board a bus

Emma followed her grandmother on the bus and got hit by a cyclist. An 18-year-old woman who came rushing high-speed downhill on the bike path and hit the teenage girl who was

entering the bus. Emma had seven stitches and got a big tear under one eye. In addition, two ribs were broken and Emma Wex had concussion.

Shared spaces at bus stops in Surrey puts our Disabled community at risk. Many of our members have experienced a floating bus stop/shared space in other areas such as London and reported how dangerous they have found them.

London has become a no-go area for many disabled people particularly those with a visual impairment and we do not wish to see Surrey going the same way. Our members are very independent and travel throughout Europe by public transport but are unwilling to travel in London because of floating bus stops and shared spaces. If people lose their independence this could also have implications for social care.

One Disabled person reported the experience of using a floating/shared space bus stop terrifying and felt he had to move from his home in London. Please see reference 4 to access the news article. ⁴

Please keep our Disabled community safe and stop the development of these proposals.

We of course will be very happy to discuss further.

Best wishes

Nikki Roberts

CEO, Surrey Coalition of Disabled People

Appendix A

Islington Tribune Article Cycle lane that pedestrians branded dangerous is axed. Cycle lane that pedestrians branded dangerous is axed

Published: 4 March, 2016 by JOE COOPER

THE Town Hall has agreed to remove a raised cycle lane between the pavement and the road which has been branded “terrifying” by visually impaired people. The lane has been raised to the level of the pavement so cyclists are not impeded by buses stopping. But Tufnell Park barrister Olav Ernstzen points out that it puts vulnerable pedestrians in danger by forcing them to step into the cycle lane. Cyclists racing home along New North Road pass inches from people stepping off buses at the stop at Elizabeth Avenue, Canonbury. “It’s wrong in so many ways,” said Mr Ernstzen, who is chairman of Healthwatch Islington. “On a common-sense level or from an equality impact assessment perspective this fails.” Mr Ernstzen said bus travel was vital for the independence of disabled people in the borough.

“It’s also a worry for parents with a baby in a buggy, wheelchair or mobility scooter users and people just coming home with shopping,” he added. “Cyclists have the choice of putting pedestrians at risk or, if they choose to go outside the bus where they now have less room, putting themselves at risk.” The cycle lane is on the way to Moorfields Eye Hospital. Elizabeth Jones, who set up Talking News Islington, said: “When I step off the bus I put my stick first. If that got caught in a cyclist’s wheel there could be a pile-up.” The council has agreed to remove the raised lane after admitting to Mr Ernstzen that it had not followed its own equalities policy. Transport chief Councillor Claudia Webbe said: “Our designs here could have been better as it is clear that Mr Ernstzen’s needs were not considered. “The council has listened to the concerns and I have requested the removal of this ‘shared space’ and a better solution for cycle safety that does not disadvantage bus passengers, particularly those who are disabled.”

References

1. https://www.researchgate.net/publication/237524182_Bicycle_Tracks_and_Lanes_a_Before-After_Study
2. <https://politiken.dk/danmark/forbrug/art5527002/Kaos-ved-busstoppsteder-Passagerer-bliver-torpederet-af-cyklister>
3. [Leaked documents suggest "low risk" of cyclist collisions at "floating bus stops", as blindness campaigners urge safety action on design | road.cc](#)
4. [London transport: Floating bus stops are terrifying - campaigner - BBC News](#)

Zoe Franklin, MP Guildford Constituency

Dear Cllr Oliver and Furniss

I am writing in relation to the London Road Active Travel Scheme as I understand that a final decision will shortly be made on whether / how to go ahead and as Guildford constituency’s new MP I wanted to share my support and thoughts ahead of this.

Firstly, I note that the active travel scheme, if it goes ahead, will deliver a key part of the planned sustainable movement corridor which is intended to provide a west-east link across Guildford, and improve safety for cyclists and pedestrians on a route where cyclists are 30% of road accident casualties despite being only 1% of road users. The fact that this scheme will help deliver both Surrey County Council and Guildford Borough Council’s net zero and environmental aspirations and improve road safety, continuing the project seems a win win for the councils and residents alike.

I recognise that the original proposals for the scheme met with significant opposition due to the proposed 5-month one-way closure of London Road, at very short notice, as well as due to safety concerns with some aspects of the design. However, I applaud yourselves and the Surrey County Council team for responding to this concern by pausing the scheme, setting up a stakeholder group of local representatives (such as residents associations, the schools, the

bus companies, local councillors, the Surrey Coalition of Disabled People, etc) to discuss concerns and feedback on the design, and then completely re-designing the scheme.

Following this redesign, it was very encouraging to see an extensive public engagement last autumn on your re-designed scheme, followed by further improvement of the design as a result of feedback. It was also excellent to see that in the public consultation 50% of people supported the plans for the section through Burpham, compared to 31% against. I note that after the redesign Surrey County Council decided to defer a decision on the Burpham phase of the scheme due to further safety concerns being raised by some stakeholders and commissioned an independent safety review from Arup.

I understand that the independent Arup report has concluded that the scheme is completely safe, follows the relevant guidance, and would be a major improvement to safety for all road users along the route.

Given the conclusions of the Arup report and that the scheme would provide major benefits to local residents, especially by providing much-needed safe pedestrian crossings across busy roads in the centre of Burpham, as well as encouraging more sustainable forms of travel, and given that the scheme clearly has significant public support and that any safety concerns have been completely and fully addressed, it would be disappointing should all the effort which has gone into this scheme be wasted through cancellation or further delay. Many of my constituents have been questioning what will happen with this scheme, and they deserve an answer.

I would like to end by expressing my support for the scheme and hope that you will decide to implement the Burpham section of the scheme in full, for the sake of the safety of residents and for the many residents in Burpham who would like to walk or cycle to their local schools or shops but currently feel it is too dangerous to do so.

I look forward to seeing the consideration of this scheme at your next county council cabinet meeting, and I hope you can offer assurance that the excellent potential of this scheme to benefit the local community will not be wasted.

Thanks and regards,

Zöe

Zöe Franklin

Member of Parliament for Guildford Constituency

House of Commons, London, SW1A 0AAs

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