

WSLAF response to A23 Corridor Improvements Scheme – West Sussex County Council

Response ID ANON-8993-64W1-F

Submitted to **A2300 Corridor Improvements Scheme**
Submitted on **2018-10-26 09:49:15**

Introduction

Travelling around the area

1 What type of transport do you use the most to travel along/across the A2300? (Please select one response only)

Other

If Other, please explain:

WSLAF represents all Non-Motorised Users (NMUs), including walkers, cyclists, equestrians, carriage drivers and disabled users.

2 What is the main purpose of your trips? (Please select one response only)

Other

If Other, please specify:

Leisure, health & recreation, transport

Phase 1 Design Proposals

3 Do you agree with Phase 1 design proposals? (Please select one response only)

Disagree

If you Disagree or Strongly disagree about the Phase 1 design proposals please outline your reasons:

Currently most NMUs, particularly cyclists and equestrians cross the A2300 at either the Pookbourne Lane/Stairbridge Lane junction or the Bishopstone Lane junction. The lack of bridleways in the area means that NMUs will use the 'quiet' local lanes and roads on either side of the A2300. There are no crossing facilities at either junction and users have to wait to cross at grade when they consider it safe to do so.

The crossing of this road is dangerous, particularly for equestrians, and is a deterrent to use. The current proposals to close one junction and alter the other combined with change to a dual carriageway will make the crossing of the road almost impossible for NMUs.

WSCC's Overview acknowledges that the A2300 is currently a busy road and that the proposed increase in residential development and consequent additional road traffic will increase traffic flows. There is no provision for the safety of NMUs in the proposals, especially as regards crossing the road, other than the proposed footway/cycleway along the northern verge.

The existing accommodation bridge at West End farm could provide a safe crossing facility for NMUs seeking to cross from north to south. However there is no current right of way access over the bridge.

Improved bridleway links to north and south of the road with the provision of an NMU crossing (subway, bridge, Pegasus crossing) would be of great benefit to existing and future Burgess Hill residents, providing a safe network for NMUs. A Pegasus crossing has recently been completed to allow NMUs to cross the busy A264 (a dual carriageway) at the Kilnwood Vale development at Crawley.

Design and Development of Further Phases

4 Do you have any comments about the design or the development of further phases?

Comments on further phases:

We are pleased to note that improvements to footways/cycleways are being considered as Part of Phase II. However all such routes should be multi-user. NMUs

at present create circular routes using Gatehouse Lane (BW80Hu), Malthouse Lane, BW50Hu, Pomper Lane, Mill Lane and Pookbourne Lane together with the

Green Circle bridleways around Burgess hill. There would be greater usage and benefit if these could be linked with a safe crossing of the A2300.

About You

5 Which of the following age group best describes you? (Please select one response only)

Prefer not to say

Contact details

6 Are you responding as: (Please select one response only)

Other

If 'Other', please specify:

West Sussex Local Access Forum

7 Your contact details and postcode

Name:

Graham Elvey

Address:

Chairman

West Sussex Access Forum

WSCC

1st floor Northleigh, Tower Street, Chichester, West Sussex,

Postcode: PO19 1RH

Telephone:

Email: wslaf@westsussex.gov.uk

Additional comments on the proposals for the A2300, submitted via email by a Forum member

In essence, WSCC should be complying with IAN195/16. IAN195/16 has the same legal weight as DMRB that WSCC, like other Highways Authorities, adopts as its standard. If this were an issue about provision for motor vehicles on the main carriageway, WSCC's default position would be to comply. Although the IAN does contain an 'opt-out' where the design is already too far advanced or the cost would be excessive (1.3, page 5 <http://www.standardsforhighways.co.uk/ha/standards/ians/pdfs/ian195.pdf>), there does not seem to be any justification for using this in this case.

Additionally, IAN195/16 is based on evidence of the design standards that actually work to enable cycling, so it should be a minimum default standard to meet WSCC's and the government's objectives for cycling. The WSCC Cycling Strategy implicitly recognises this: "*Infrastructure improvements will therefore reflect Government and other best practice guidance (e.g. Design Manual for Roads and Bridges, Manual for Streets etc.)*" (page 18).

Where WSCC chooses not to apply IAN195/16, it should be because it is applying a higher standard and it should be justifying its decision and taking special care to look at the safety implications of that decision.

WSCC should also be complying with the new, stronger NPPF (which now specifically refers to 'decisions' as well as 'planning').

The shared path is too narrow (at 2.5m wide) - it should be at least 3 metres wide to meet the latest standards in IAN 195/16 as it will basically be a cycle path on which people can walk. Given that the road will no doubt be built to meet the requirements of the Design Manual for Roads and Bridges (DMRB), there is every reason why provision for people who want to cycle should be included.

The path has too many high speed junctions, made worse by the 70 mph speed limit, where no help is given to people wanting to cross. This will not make it easy or safe for people to cross these side roads, breaking up their movement along the route and making it unattractive to use. Despite the 70 mph speed limit some cyclists may stay on the road because they may feel it is easier for them at these junctions, as they are currently designed, as on the road they will have priority over the side road.

There are too many sharp bends at some of the crossing points which will mean cyclists will have to cross the road more slowly, increasing their exposure when crossing the road and reducing safety. It will also be harder for some cyclists to turn and face the traffic. The path should be modified in these locations to proper design standards to improve visibility and to make it easier to cross.

There are no slips (easy access points) onto the path near the A23, at Stairbridge Lane or Cuckfield Road. So anyone coming from these directions will find it difficult or impossible to get onto the path. From the west side of the A23 there is no access onto the path, unless you are already off the road, which could cause cyclists to go on the A2300 putting themselves at risk. Elsewhere the lack of slips will cause cyclists to swerve into the traffic to get onto and off the shared path or for them to have to slow right down, or to pull out slowly, in fast moving traffic, neither of which is particularly safe or pleasant. Access slips need to be provided to allow cyclists easy and fast access onto the paths from the road and to minimise the number ending up on the A2300. Good signage will also be required but unless it is backed up by good design, people will still go wrong.

Several quieter roads that are good for cycling would be severed by these proposals with no help given to pedestrians or cyclists to cross the A2300, such as from Stairbridge Lane to Pookbourne

Lane, at Bishopstone Lane and at Cuckfield Road. This will impact mostly on recreational cycling (but not exclusively) but its importance should not be underestimated, particularly as this could force cyclists onto busier roads or deter some from cycling altogether.

As more development follows in this area, then the demand for utility and recreational cycling will rise. Yet any development to the south of the A2300 will not be easily accessible for walkers and cyclists, particularly on Cuckfield Road or via the new developer financed roundabout at the eastern end of this scheme. Neither is fit for purpose and the scheme designers have only considered the cycle flow as a linear east-west movement when in reality it will be in all directions. These roundabouts need a fundamental redesign to make it much easier and safer for cyclists to circumnavigate them to access all directions.

The path under the retained overbridge is right next to the 70 mph carriageway. This is dangerous. The central reservation should be reduced and or the road moved across to provide the required separation between road and path. Standards require an absolute minimum of a 3 metre separation between the road and path for a 70 mph road. Otherwise people walking and cycling could be severely buffeted by passing traffic and even sucked into a vehicles slipstream. If redesigning the road layout cannot provide this, then the speed limit should be reduced until the appropriate separation can be achieved.

In addition to the above concerns, the path needs to be built to a high standard with a smooth sealed surface (such as tarmac) to make the route attractive and easy to cycle and any lamp columns, signs and other obstructions should be at least 0.5 metres clear of the actual path.

Overall, it should not be acceptable for the road to be built to DMRB standards - but not the walking and cycling elements. It seems that there is pervasive discrimination within WSCC against sustainable transport - apart from the proposal being contrary to the NPPF.

Last - some questions WSLAF should ask of WSCC:

- Where is WSCC's assessment and formal decision not to apply IAN195/16 and what would their position be if the victim of a collision sued them?
- Where are the safety assessments and audits of the aspects of the design (e.g. uncontrolled crossings of 70 mph roads) that do not meet IAN195/16?
- What are the relevant (specific to cycling design) qualifications and experience of those who carried out/will carry out the assessments?
- What evidence does WSCC have that its design for cycling will not adversely impact on safety, attractiveness, convenience, comfort and coherence and on the accessibility and usage of the facility?
- How has WSCC taken into account its duty under the Equality Act to provide for people with disabilities and taken into account the aims of the Government's Inclusive Transport Strategy? Has WSCC assessed its proposed provision against the WfW Guide, <https://wheelsforwellbeing.org.uk/wp-content/uploads/2018/02/v2-Nov-2017.pdf>
- Has WSCC assessed the number and cost of death and injury collisions likely from the current design (at crossings and due to faster riders continuing to use the road)?
- Has WSCC considered the stronger requirements of the new NPPF that mean that inadequate walking and cycling infrastructure can prevent or limit permissible developments that rely on the road? E.g. Impact on Highway safety is now grounds for refusal of planning consent and that The scheme does not conform to the National Planning Policy Framework (NPPF) which says that pedestrian and cycle movements should be given priority (para 110).

- How will WSCC ensure that the cycle tracks are kept clean, free of overhanging vegetation and cleared of snow and ice?

Geoff Farrell

October 26 2018