Norwich Cycling Campaign response to planning application 2022/1172 Discharge of condition 22 (off-site highway improvement works) of planning permission 2014/2611

Whilst we welcome the aspiration to provide a safe, convenient cycle route from the Festival Park development across the A47, there are several serious safety issues with this proposal which have not been addressed nor seriously considered and the information provided to the consultation is misleading or outdated.

The scheme is underpowered for the non-motorised user (NMU) traffic it is likely to attract and is therefore dangerous

The stated purpose is simply to provide a cycling and walking route from the Festival Park estate across William Frost Way, Not considered is that it will also serve the Norfolk Showground, Easton College and the existing village of Easton. The route is also the only connection between the city and the communities to the west.

This demand is likely to be significant yet has never been assessed. People are likely to be crossing in groups and in both directions at peak times.

The narrow section between the slip roads across the A47 bridge represents a major bottleneck on this route, with people being unable to easily pass, especially if they are wheeling bicycles. Compliance with such a long dismount section on a long distance commuting route like this is also going to be low, as accepted by the safety audits.

An outdated design has been submitted for consideration

The plans submitted for consideration would appear to be out of date.

In his response to a question asked at the recent Cabinet meeting on 27th January, the Cabinet Member, Cllr Graham Plant said:

“Across the bridge over the A47, those cycling will be clearly informed through traffic signing to dismount over the bridge deck due to a narrower width of path.”

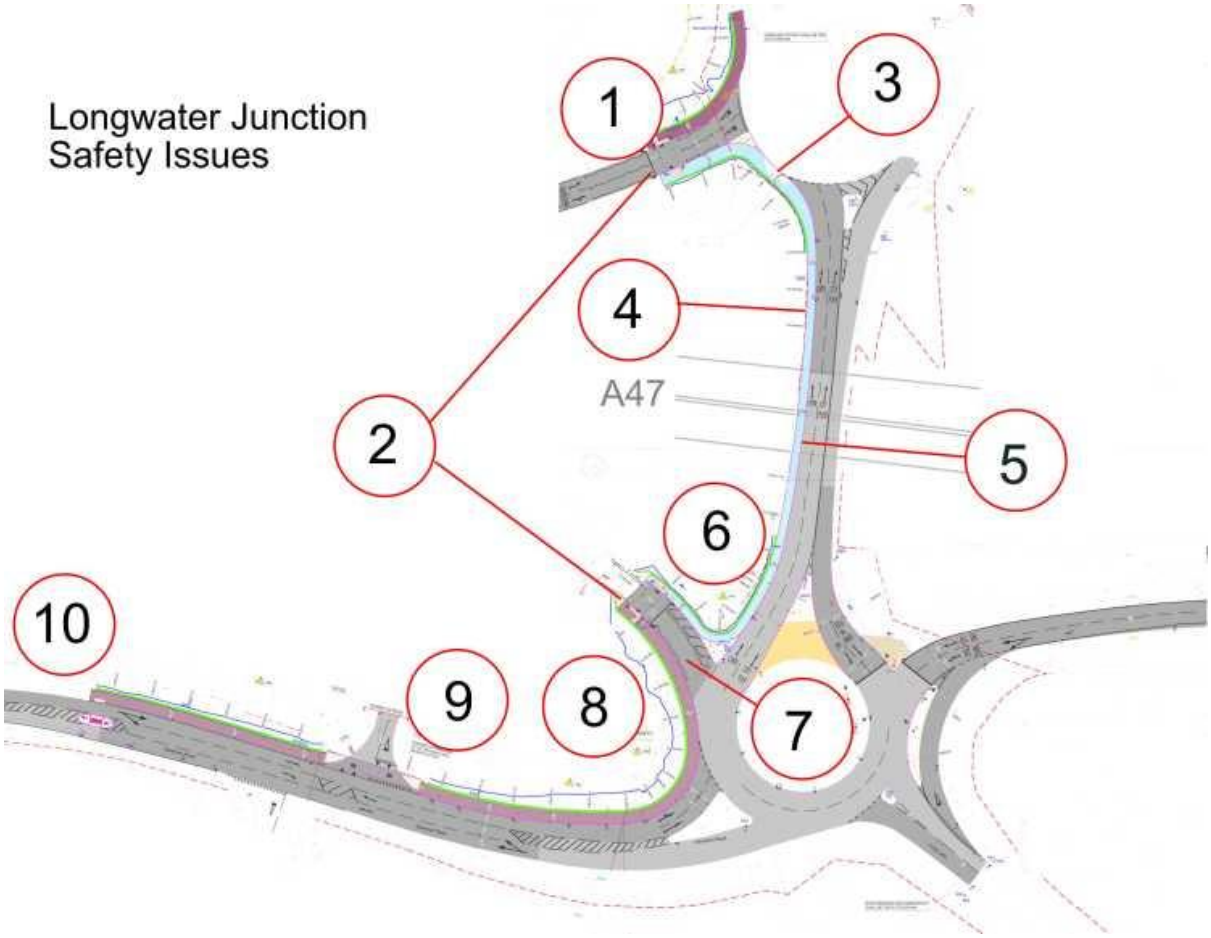
This would seem to imply that the plan had been modified so that the narrow section was confined to the A47 bridge, in line with comments made in the stage 2 safety audit and by the Norwich Cycling Campaign in a meeting in August 2023.

The plan submitted for consideration would therefore seem to be outdated, as it shows the entire route across the slip roads to the A47 bridge as also “cyclist dismount”. It also contains other errors outlined below.

Detailed commentary on the stage 2 safety audit (RSA2) carried out in March 2023

Note: An RSA is supposed to be signed off by three people – the auditor, the designer and network management. RSA2 has not been signed off by network management (i.e. Norfolk County Council Highways), nearly two years later.

The audit identified most, but not all, of the issues we had already raised with Norfolk County Council, as well as some additional issues. There are 10 points of interest from the RSA, our comments in bold:



The description follows the numbering of the diagram above, starting at the northern end of the scheme. Numbers in brackets relate to the Stage 2 safety audit comments, with our response.

1: Collisions with NMUs on the A47 eastbound approach to the puffin crossing (2.4)

The auditor proposes that the length of 65 PSV (Non-skid) surfacing be increased from 55m to 80m to ensure vehicles can stop.

If this would improve safety, it should be done.

2: Replace puffin crossings with toucans, limit narrow path to the overbridge only (4.1)

The auditor suggested the proposed puffin crossings should be made into toucans, the path from the crossings to the overbridge widened to 3m and the “cyclist dismount” section reduced to simply across the overbridge, which they suggested would improve compliance.

We strongly endorse the auditor’s suggestion to provide toucans and a full 3m wide shared-use paths on the approaches to the bridge, confining the narrow section to the bridge itself if this is really necessary.

We were told informally this was going to happen following our meeting with Norfolk County Council in August 2023, but we have not seen it confirmed, however the Cabinet Member’s comments described above do seem to confirm this change.

3: Layby and camera pole blocking path (4.4)

Proposals for the William Frost Way crossing show a service bay located on the exit from the Longwater shops.

There must be a minimum 2m width path past any vehicle using this layby. The path here is 4.5m wide, but the layby is on a bend so a vehicle such as a Ford Transit type van would make this uncertain. The path must not be blocked by any vehicle using the layby. The exit from the Longwater shops would seem to be an unwise location for it.

RSA 2 recommended moving the CCTV column, but this is shown still in situ on the plans submitted.

The plans also show several lighting columns in the pathway. We were under the impression these would be moved. Is this another example of the plans being out of date?

4: Bridge Parapet (Page 5 Intro of RSA2)

It has been accepted that people would ride bicycles over the bridge and recommended increasing the height of the parapet to prevent falls on to the A47. We understand from further comments made by the Cabinet Member on 27th January that this has been accepted, but the plans submitted show only a 1.4m high parapet, it should be 1.5m as mentioned in RSA2.

5: Kerb overrun by HGVs/pedestrians stepping or falling into the road on the overbridge

Item 4.3 of RSA2 identifies the risk of NMUs entering the carriageway due to an obstruction from a lighting column (LP897). The recommendation was to remove the column. The plans submitted show the column still in situ.

In addition, although not mentioned in RSA2, if avoiding this lighting column would cause NMUs to enter the carriageway, the same will apply to people passing on the path, especially if people are wheeling bicycles which would mean they take up more space than the lighting column, with the added hazard that they are moving.

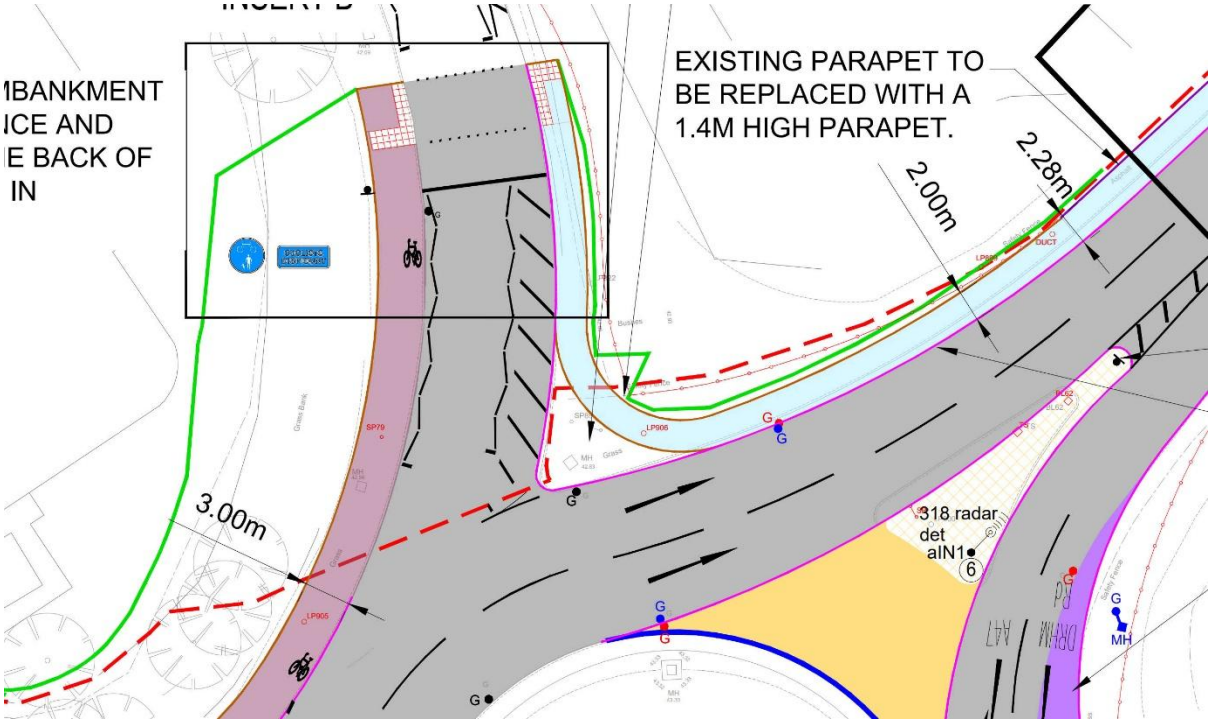
There is a clear risk of NMUs entering the carriageway as they pass on the narrow path over the bridge.

There is also a clear risk of kerb overrun by vehicles as they cross the bridge in the narrow running lanes. This is especially true for HGVs. If this were to happen NMUs would be trapped by the parapet fence.

Vehicle overruns on the A47 bridge can be prevented by the use of containment kerbs, and pedestrians can be prevented from entering the carriageway by a fence mounted atop the containment kerb.

6: Narrow pavement/risk of falling down steep embankment (4.2)

The junction is built on embankments with steep sides never designed to accommodate a cycle route, the path will come close to the steep slope and the auditor suggested there is a real risk of cyclists and pedestrians falling in the west bound slip road. There is no need for this issue to exist.



The on-slip carriageway is proposed to be narrowed to one lane on the approach to the crossing by means of carriageway hatching (see image above), so it's possible to take some land from the carriageway beside the on-slip, which would not only

provide space for a full 3m shared-use path beside the slip road, but also a 50cm buffer between the path and the road, as per LTN 1/20.

In the plans, the crossing extends over two lanes of the slip road, despite the right-hand lane being hatched out. We would also like to suggest that the crossing here be narrowed so as to cross the one operational lane, with the waiting area on the north side moved into the hatched-out section of road. As mentioned in point 2 above, the crossing should be a toucan, not a puffin.

Otherwise a fence should be provided along the edge of the steep slope of the embankment as a simple way to prevent falls.

7: Proposal to add extra zig-zags to increase conspicuity of the crossing (5.6)

The auditors expressed concerns about the conspicuity of the proposed crossing of the on-slip road. They suggested adding more zig-zags to the controlled area.

If 9 zig-zags would improve safety here and is permitted, then why not do it?

8: Problem – HGVs overrunning the cycle track (2.2)

There are several tyre tracks in the grass verge, where the path is intended to run, providing clear evidence of vehicle overruns. This is another place where containment kerbs would be the better choice.

A similar arrangement has already been used on William Frost Way, for example on the roundabout by-pass adjacent to Next.

9: Hotel entrance crossing (3.4)

The stage 2 safety audit identifies the danger with the proposed cycle track close to the mouth of the junction and recommends the radii of the junction mouth be reduced

The proposed junction crossing as designed is dangerous for the reason stated by the auditor. The crossing should be built to LTN 1/20 standards (the national design standard) as a set-back crossing away from the junction mouth, on a raised table across the entrance road. There is space within the highway boundary to provide a set-back crossing of the hotel entrance.

10: Bus stop to be moved west of the island (2.1)

The auditor identifies a problem with the location of a bus stop immediately west of the proposed crossing, which could lead to drivers overtaking a stationary bus to pass the crossing island on the wrong side of the road.

The recommendation from the auditor is to relocate the bus stop slightly east of the crossing and the designer agreed. This would put the bus stop close to the hotel

entrance and opposite the entrance to the Showground, in the hatched area reserved for turning vehicles and it would place the bus stop on the shared-use path, causing conflicts between pedestrians, cyclists and bus passengers. Relocating the bus stop slightly further east would seem to be unworkable. If the bus stop was located west of the crossing this would avoid conflicts between pedestrians, cyclists and bus passengers.

Summary

The plans submitted for consideration are out of date and it's clear no proper assessment of the project has been made. The plans should be sent back for further consideration.

Norwich Cycling Campaign
February 2025