Southwark Cyclists

London Cycling Campaign

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3rd September, 2017

Dear Southwark Council,

This letter forms Southwark Cyclists’ consultation response to the Highway Infrastructure Asset Management Plan (HIAMP). In addition to a direct email to the Highways mailbox it has been entered into our response through the online consultation portal in the free text section of question one. The two responses are identical, excluding any formatting differences.

Overall, Southwark Cyclists gives conditional support for the proposed ‘master’ policy HIAMP document, subject to a number of caveats.

1. The status of the HIAMP ‘daughter’ documents is not clearly explained in either the master document or the consultation information. These daughter documents include Addendum Sections 01 to 06 and the Highway Policy Plan (HPP).

It is unfair to embark on a public consultation of such strategic importance to the whole Borough without making clearer the process for approving the underpinning *detailed policies* of the HIAMP. There is a risk the HIAMP will not have appropriately scrutiny with current approval process.

1. We suggest that the master document be edited to clearly include the following information, as provided through correspondence on the 31st August and 1st September with Gary Douglas (Cycling Stakeholder Group coordinator):

*“The HIAMP document is effectively the master document that sets out the high level strategies and once approved by the Lead Cabinet Member will essentially remain unchanged for hopefully the next few years.*

*…there will be a set of “daughter” documents that support the HIAMP which will cover areas such as levels of service, inspection frequencies, intervention levels, investment levels, forward programme of capital works, winter maintenance, flood strategy etc.*

*Most of this information is currently available in various documents such as Council policies, previous Lead Member and Cabinet reports, and various contract information.*

*The intention is to collate all the information into an easy to understand suite of documents that will be available on the Council website for public viewing. The development of the daughter documents will take place over the next few months.*

*The noted documents (Addendum Sections 01 to 06, Highway Policy Plan (HPP) by [named Southwark Cyclists volunteer] will be developed over the next few months once the high level strategy is signed off by the Cabinet member.”*

1. During the development of the HIAMP daughter documents, we request that:

3a)  London Borough of Southwark (LBS) engages with Southwark Cyclists, and appropriate stakeholders.

3b) LBS includes London Cycling Design Standards (LCDS) in their guidance of master HIAMP policy and in consideration of detailed policies.

3c) As LBS are seeking public approval for a master HIAMP document, not of the detailed daughter documents, our approval of this does not mean automatic approval of daughter documents or their policies. Southwark Cyclists recommends, and would take up opportunities, for stakeholder engagement and/or consultation during their preparation.

The remainder of our submission details specific items that we suggest for inclusion in either the HIAMP master or daughter documents and policies. This corresponds to consultation question 1, ‘Do you think any other assets should be included?’, but also suggests how these assets might be included.

1. We suggest that the following data be collected and analysis conducted, related to all assets covered by the HIAMP. This will be of use to both the HIAMP process and re-use in other transport decision-making.

At both the data collection stage and the analysis stage:

4a) A record of all assets that have been damaged by collisions with vehicles. Reporting should isolate repeated collision damage from genuine wear and tear.

4ai) Collison-damage records will allow the cost of collisions to be more accurately stated, and for decisions to be made as to the cost-effectiveness of preventative action, whether that is the non-replacement of the asset, or design and regulation alterations to prevent collisions, for example by reducing traffic speeds and volumes.

4aii) Collision-damage records will support analysis of their correlation with road traffic incidents in which people are Killed or Seriously Injured (KSIs), and of perceptions of traffic danger. Asset collision-damage data has the potential to be a valuable, innovative indicator for locations which could benefit from preventative action to reduce road danger, and for identifying locations where road danger is not causing KSI incidents but is supressing the uptake of sustainable modes. This accords with the Mayor’s Transport Strategy’s Vison Zero and Healthy Streets policies.

4b) Addressing general wear and tear, we suggest that analysis be conducted into the potential financial savings to be made by schemes that reduce the size of the carriageway or reduce motor traffic flows. For example, by kerbside alterations such as footway widening, pedestrian-crossing build outs, cycle hangars and parklets, but also by area-based traffic reductions such as filtered permeability and weight or width restrictions.

4c) We suggest that the HIAMP delivery investigates alternative sources of data for identifying routes with high cycle flows, such as TfL’s Cynemon system (and Strategic Cycling Analysis), but also Strava, London Cycle Hire, Citymapper etc, along with a specific milestone to periodically review relevant new datasources.

This will support the HIAMP plan to use higher standards of maintenance on 'cycle routes', which seem to be defined as official cycle routes. However, many roads that are not official cycle routes have high cycle flows. We support this policy.

4d) Alongside the use of data to identify routes with high cycle-flows, we ask for program to ensure that routes with high volumes of cyclists are gritted by council providers and provided with additional grit bins.

5. London Cycling Design Standards (LCDS) provides TfL’s guidance for highways Maintenance and asset management of highways with regard to cycles. In particular, refer to LCDS Appendix two, Legislation and Guidance, with examples including but not limited to:

5a) It is recommended that each highway authority should: Integrate consideration of cycle facilities into planned road maintenance programmes – for example, identifying what improvements for cycling can be made as part of planned resurfacing

5b) In the LCDS, maintenance hierarchy to be based on cycle flows and the relative importance of designated routes. This is significantly better and safer than the “simple” weighting proposed in the consultation (Pg 23 consultation document).  See Section 7.4 <http://content.tfl.gov.uk/lcds-chapter7-construction.pdf>

6. The HIAMP to include recognition of the cycle ‘sensitive’ nature of certain roads, in additional to cycle routes, and cycle tracks.  LCDS 7.4.3 Surface quality: *Some streets are more sensitive than others to the negative effects of surface defects and, through maintenance regimes, should be prioritised. These sensitive streets include feeder access routes to schools and parks, or any other street often used by children, older people or people carrying children on cycles.*

7.  Traffic Management and Temporary Measures. Many routes carry as many or more cyclists than motor vehicle traffic peak times.  Some Temporary Measure diversions on busy routes can place cyclists at significantly greater risk of increased danger and need careful planning with appropriate stakeholder groups.   HIAMP to detail the strategy towards Temporary Measures management for cyclists and vulnerable road users.

8.  Intervention Levels for remedial works to be set to be no worse than set for TfL adopted highways.  In particular, this allows consistent network safety standards and comfort for road surface dangers for cycling throughout Southwark, that covers both Southwark and TfL adopted roads.   TfL intervention levels were specified in Mayoral Question Time’s reply to Question No: 2013/4649 Appendix 4054 (reproduced below), and to be reviewed to be kept in line with current levels from TfL.  The surface of a cycle routes, cycle tracks, and cycle sensitive roads, is crucial to its acceptability by a cyclist.

9. “*Uneven road surfaces*” and longitudinal gaps or cracks are particular unique dangers to cyclists, that can cause cyclists to become unstable, and may then be placed in life-threatening situations by other motor vehicles.  See Highway Code 213 *“Motorcyclists and cyclists may suddenly need to avoid uneven road surfaces…”.* With very large number cyclists common on many roads, often mixed with live and busy traffic, Southwark Cyclists would welcome these specific intervention levels to be reviewed and improved.

10.   Provide policy towards training for service delivery personnel specifically referencing health and safety needs of users and cyclists, including, but not limited to: all road activities near cyclists (e.g street cleaning), using vehicles in segregated or partially segregated areas and in treating footways.

11. The Asset Sweating policy should take account of actual cycle flows, which often differ from general traffic or motor vehicle flows, along with the greater impact of road deterioration upon bicycles and the lower wear and tear upon roads by bicycles. The Asset Sweating policy aims to delay remedial works where possible without putting the service or highway users at risk.   It is vital that the planned intervention strategy specifically accounts for the impact to cycle comfort and cycle safety, and prioritised based on cycle flows and cycle sensitive nature of the road. The maintenance strategy must not discourage cycling, ensuring the safety and serviceability of cycle routes.

12. The maintenance of adequate levels of skidding resistance on carriageways, footways and cycle routes is a most important aspect of highway maintenance, and one that contributes significantly to network safety, particularly for cyclists.  ‘Asset Sweating’ policy should not compromise safety for cyclists from reduced skidding resistance, or being an uneven road surface, and risking cyclists to suddenly swerve. This concern will be more pronounced for more ‘difficult’ sites, and sites where there is ongoing loose gravel risks from a deteriorating road surface and often peppered with repairs over a short section.    Difficult sites are those where the geometry, for example, bends, junctions, roundabouts, steep gradients, pedestrian crossings and traffic signals increase the risks of skidding accidents.

**Reproduction of Mayor’s Question Time, reply to Question No: 2013/4649 Appendix 4054**

**TfL inspection and maintenance intervention levels**

The TfL road network comprising, footways, carriageways & cycleways are inspected at regular intervals by a team of trained highway inspectors at frequencies varying between weekly and monthly depending on usage. The inspectors record defects and prioritisation according to severity follows.

Defects posing cycle specific hazards are identified as follows within TfL highway features:

**Carriageway**

* A pothole 20mm or deeper over 100sqcm or more within 1.5m of the kerb or within a formally marked cycle lane
* A pothole 30mm or deeper over 100sqcm or more elsewhere
* Spalling of concrete 20mm or deeper over 400sqcm or more
* Crowning of 40mm or more over a 3m length
* A depression of 40mm or more within a 1m length or 25mm or more within a 300mm length
* Rutting of 40mm or more
* A gap or crack 20mm or wider, 40mm or deeper and 500mm or longer
* An oil or diesel spill over 1sqm
* Missing or defective anti-skid surfacing over 1sqm
* Standing water 10mm or deeper over 500mm in width adjacent to the kerb or 20mm or deeper over 1sqm or more elsewhere
* Debris, building materials, abandoned vehicles or other obstruction likely to create a hazard
* Inadequate signing or guarding of works

**Pedestrian Crossing**

* A ‘trip’ of 20mm or more

**Footway/Shared Path/Cycle Track**

* A ‘trip’ of 20mm or more
* A pothole 20mm or deeper over 100sqcm or more
* A rocking slab or block with 20mm or more movement
* A gap or crack 20mm or wider, 20mm or deeper and 200mm or longer
* Standing water 10mm or deeper over 1sqm or more
* Cellar or other access doors or vents likely to create a hazard
* Damaged, misaligned or defective street furniture likely to create a hazard
* Height clearance less than 2.5m to cycle path or cycle track below signs or overhanging trees or vegetation
* Height clearance less than 2.1m to footway below signs or overhanging trees or vegetation
* A tree base 20mm or more below footway level
* A damaged or defective tree grid likely to create a hazard
* Advertising, scaffolding, hoarding, building materials, vegetation or other obstruction likely to create a hazard
* Inadequate signing or guarding of works

**Cycle route / shared path**

All as other features with the addition of:-

* A longitudinal gap or crack 10mm or wider, 40mm or deeper and 500mm or longer
* An oil or diesel spill over 300mm diameter
* A ‘trip’ of 20mm or more
* Gully grating unsuitable for cycling
* Minimum headroom clearance for cyclists less than 2.5m

**Kerbing**

* A unit dislodged by 50mm or more horizontally
* A unit sunk by 20mm or more compared to an adjacent unit
* A unit rocking with 20mm or more of movement
* A missing unit

**Ironwork**

* A broken or cracked cover likely to create a hazard
* A worn or polished cover likely to create a hazard
* A missing cover
* A rocking cover or frame likely to cause a hazard or noise nuisance
* Ironwork sunk or projecting by 20mm or more
* Fluid discharging and likely to create a health or safety hazard
* A missing gully grate
* A blocked gully likely to create a hazard
* A broken or cracked gully grate likely to create a hazard

**Defect Response**

Once a defect has been identified, it is assessed to determine the likelihood of injury. This will depend on its severity, location and likely level of usage by road users. The most urgent defects are made safe within an hour. Other defects are usually required to be repaired within 24 hours, 7 days or 28 days depending on an assessment of their risk.

**HIAMP Consultation questions**

**2. Do you agree with our plan to prioritise our spending on prevention rather than cure? Fixing streets in poor condition before they develop defects?**

**(Strongly agree – Agree - Neither agree or disagree – Disagree - Strongly disagree - Strongly agree)**

Strongly agree

**3. Do you agree with our plan to adopt a “risk” based approach to highway maintenance? Concentrating on busier roads where more people drive and walk and repairing them sooner than residential roads and cul-de-sacs?**

**(Strongly agree – Agree - Neither agree or disagree – Disagree - Strongly disagree - Strongly agree)**

Strongly agree

1. **What part of the highway do you think is most important and should be considered first?**

**(Most important – more important – important – less important – least important)**

Carriageways – more important

Footways – most important

Cycleways – most important

Plazas/open spaces – important

Structures – important

Drainage – important

Street furniture – important

Thank you for taking the time to consider our response,

Faithfully,

Andy Cawdell

Coordinator, Southwark Cyclists

On behalf of Southwark Cyclists,