

My ref:  
Your ref:  
Date:  
Contact:  
Telephone:  
Email:

7<sup>th</sup> October 2024

Mr. David Heming  
Senior Coroner  
for Cambridgeshire and Peterborough  
HM Coroner's Office

**Chief Executive's Office**  
Cambridgeshire County Council  
New Shire Hall  
Emery Crescent  
Enterprise Campus  
Alconbury Weald  
Huntingdon  
PE28 4YE

Dear Mr Heming,

**Cambridgeshire County Council response to Regulation 28 report, Puddock Road**

I write in response to the Regulation 28 Report to Prevent Future Deaths, dated 26 July 2024, which followed the Inquest into the deaths of Jennifer Bunyan, Marion Bunyan and Erin Marion Chatten. In responding to you I first, and most importantly, wish to express the County Council's sincerest condolences to the family and friends of Jennifer, Marion and Erin.

I also recognise that this response has taken longer to be produced than I would have expected, or in accordance with the timescales you originally set. Please accept my apologies for this delay, which was impacted by some organisational changes within the County Council, which meant that this response involved a number of teams in transition to new roles and reporting arrangements. However, I am pleased we are now in a position to be able to formally respond to you.

Therefore, this letter details Cambridgeshire County Council's response to the matters you have raised as of concern as listed below.

**A. *Speed limit:***

*The designated speed for this section of road was 60 mph. The charity BRAKE have stated that the default speed limit on rural roads is 60 mph, a speed at which it is rarely safe to travel.*

*They stated the approach should be based on the design of roads. This road has an uneven road surface and it was within local knowledge that the designated speed limit was dangerous and could lead to a loss of control whilst driving in the upper speed range.*

*The need for a reduction in the limit as a safety measure does not appear to have been raised during inspections/debriefs following a series of fatalities that have led to a number of drowning incidents along this section of road. It raises a concern that the speed limit should be reduced significantly as a risk reduction measure – some areas have adopted 20 mph on some sections of road.*

**B. *Inspections of the road***

*I have a concern that inspections of the road have not been sufficiently rigorous given a recurring issue of highway degradation from 'rutting' at the carriageway edge which can be a contributory factor causing loss of control of a vehicle.*

*It is unclear if the council have carried out audits to review the quality of inspections and whether there have been examples of substandard inspections.*

**C. Length of time to effect remedial action**

*These deaths occurred on the 7<sup>th</sup> June 2020 and there had been previous fatalities along this road which had led to fatalities caused by drowning when vehicles left the road.*

*A Barrier to prevent entry to the waterway would be one effective measure that has been deployed in many other places to prevent a vehicle leaving the road and yet, I understand no final solution is in place.*

**D. Highway degradation**

*This has been an issue and I have a concern about prompt repairs being effected to the road and also the weight of vehicles which is a factor in damage to the verge adjacent to the road itself.*

**E. Local safety group**

*The Fenland Road Safety Campaign (Charlotte's Way) have undertaken outstanding work as a charity in raising awareness of the dangers of Fenland roads given the unique environmental factors involved. It is not clear whether there has been prompt action taken following representations from them on safety matters.*

The County Council has carefully considered the issues that you have raised and offers the following response to each of these areas:

**Speed Limit**

The speed limit on the single-track section of Puddock Road will be reduced to 30mph, with 40mph buffer entry sections, from November 2024. A formal traffic regulation order (TRO) has been approved for implementation of the new speed limit. The order will be formally made following installation of the signage.

**Inspections of the road**

Puddock Road is subject to a formal inspection every three months and regular visits from a Local Highway Officer. Where identified, necessary repairs are undertaken and where possible, rutting is back filled. This is an interim solution to a complex issue around soil erosion and climate factors. In July 2024 soil core sample were taken from random sections of Puddock Road to assist engineers in understanding what lies beneath the road and identify possible long term remedial solutions. The core samples have revealed a peat layer between 300 and 500mm deep, on top of which is a layer of silty clay.

As with other Fenland roads, Puddock Road is identified as one of the roads that has been impacted by the behaviour of the soils on which the road has been built. Engineers are now consulting on how best to deal with the rutting caused by the use of heavy

agricultural machinery that overruns the paved road. Verge reinstatement trials will begin in early 2025 where different sections of rutting will receive treatment to see which performs best under varying conditions, and when it is anticipated the verges will be at their softest and most susceptible to collapse or wash out. As part of a wide-ranging change programme within our Place and Sustainability directorate, the County Council is revising and tightening its assurance arrangements.

### **Length of time to effect remedial action**

Following the fatalities, Puddock Road was identified as a priority for remedial action and funding prioritised as part of the Road Safety Programme agreed by the Highways and Transport Committee on 12 July 2022.

Due to the nature of this road the initial consideration was to review the use of a Vehicle Restraint System (VRS, or Barriers). Having carefully considered this option with expert technical advice, the project board made a recommendation to the Council's Highways and Transport Committee that alternative measures be implemented. The VRS was not considered suitable due to the ground conditions, which may not be capable of withstanding an impact and the barrier may simply collapse. A rafting barrier solution that has been used by National Highways was also considered, however the cost and complexity of such a system was prohibitively expensive, not only to install but also to maintain, and again with no guarantees of structural rigidity being retained over time.

The investigation of these options took some time and informed the resolution to pursue the changes to speed limits noted above. The outcome of the investigations into various options was reported to the Highways and Transport Committee of the County Council on 5 March 2024, whereby members approved the recommendations for a series of measures including the speed reduction, access restriction and works to improve the edge of carriageway, as detailed further below.

### **Highway Degradation**

The composition of Puddock Road presents the County Council with many challenges, not least of which is the sub soil that the road is built on. Repairs that have been completed do not last, and with the continued movement of the sub soil it is proving difficult to find a long-lasting solution. This is why the Council instigated the enhanced maintenance checks on Puddock Road. A weight restriction on the road was considered but is not being progressed at this time due to the access requirements for farm vehicles. The trial sections to treat rutting in the verge will be commencing in early 2025 will hopefully give us some longer-term solutions to the soil erosion issues.

### **Local Safety Group**

The Fenland Road Safety Campaign (Charlottes Way) have long been advocates of safer roads and road environments in Fenland. The Council's Road Safety Manager is in regular contact with their chair, [REDACTED] on matters of concern to them.

## **Puddock Road Project Board**

The County Council's Puddock Road Project Board meets monthly to ensure that all planned works remain on target, and that any issues that arise are addressed to avoid, where possible, any unnecessary delays. The timeframes for the interventions noted above are set out below:


- Traffic regulation order for the 30mph stretch was advertised on 13 December 2023 and ended on 15 January 2024 without objection.
- Traffic regulation order for the 40mph buffer zone was advertised on 22 April 2024 and ended on 16 May 2024 without objection.
- Core samples along the carriageway and verge were taken in July 2024 and analysis is now complete to establish next steps to deal with soil affected roadsides and roadway – report received in September 2024.
- Introduction of the 30mph speed limit (with 40mph buffers Zones) by the end of November 2024 through signing and lining.
- A traffic flow survey will be conducted in early November 2024.
- Informal engagement will be undertaken on the closure or restricted access for Puddock Road after the completion of the traffic flow survey. A formal application for a Traffic Regulation Order will be made and subject to a statutory consultation.
- Subject to approval of the TRO and following the implementation of the restricted access, further monitoring will be put in place to check compliance with the traffic order. Should action be necessary to enforce the order then the County Council will review the options available.
- Verge re-instatement trials will commence in early 2025.

## **Summary**

The County Council has undertaken a considered and detailed review of potential measures to be taken on Puddock Road and, by taking the above action, it will make Puddock Road safer for all users, with appropriate systems in place to manage risk. The County Council will continue to monitor the Puddock Road going forward.

Should you require any further information in response to this matter, please do not hesitate to contact me.

Yours sincerely,



Chief Executive