

Pulteney Estate Residents Association (PERA) response to Active Travel Scheme: City Centre-Uni Cycle Route (Beckford Road/North Road)

PERA fully supports the Council in its efforts to encourage a switch from private cars to mass transport, cycling and walking. We also are firmly behind the Council's Declaration of a Climate Emergency, and its subsequently set targets to increase carbon efficiency. With much regret, PERA have concluded the scheme as proposed is contrary to these important Council declared policies and objectives, and the inevitable detrimental impact on residents, in roads which will receive increased traffic, is unjustifiable.

Whilst great emphasis is placed on the fact that there will be a "trial", it is clear that an absolute prerequisite for carrying out a trial should be that a plausible case can be made out for doing so. No plausible case has so far been made that the scheme would even break even on Climate Emergency and Carbon Neutrality objectives, and it appears inevitable it would be significantly counter-productive. That is because "gains" are low due to the target audience for the cycle route (students) mainly already using buses not cars, and mostly being in Bath only 30 weeks a year, whilst "losses" due to length and extra gradient of alternative routes will be relatively high per journey.

Additionally, the impact of a trial must be properly monitored, and a trial should allow adaptation or reversal reasonably easily to address problems. Neither of these minimum thresholds is met either.

To displace traffic and pollution from North Road, having few houses, mostly some distance from the road, to heavily populated residential roads with many, many times more homes, and many of which are far closer to the roadside and more vulnerable to air pollution, the Council must be expected to provide a strong case for justification. On the contrary, any objective analysis with reference to tackling Climate Emergency, working towards Carbon Neutrality and tackling Air Pollution leads to the inevitable conclusion that the current plans including a bus gate (whether in both directions or uphill only) are completely unsustainable and counter-productive.

In all the circumstances PERA is strongly opposed to the trial proposed by the Council.

ADDRESSING SPECIFIC ASPECTS OF THE SCHEME AS PROPOSED:

WHY NORTH ROAD? The choice of a route via Beckford Road and North Road seems quite bizarre to most who are familiar with the area. It is the least intuitive and the least likely to be a successful cycle route to the University: (i) The route takes cyclists through two extremely busy road junctions on the trunk road network within the city. These can be avoided if another route is chosen, making any other route safer. (ii) Because it is in fact a destination road with several traffic-generating facilities, the closure of North Road to cars is unlikely to be able to achieve reduced emissions and any increase in cycling will need to be massive to be even just carbon-neutral – see below. (iii) Due to the lack of footfall after dark, the remoteness of the relatively few houses from the road, and the absence of even any homes along much of its length, a North Road route is likely to be avoided by many at

dusk and after dark. This will obviously be especially marked for those who feel anxious or vulnerable at night, for example women. Safety in the evening and at night seems a clear concern. Even if stronger lighting were installed (which would clearly have ecological consequences in this basically rural area), the prospects of female students, in particular, using this route at dusk or after dark will be tiny. We do not believe the matter of night-time safety has been sufficiently taken into account.

TURNING TO SPECIFICS OF THE PROPOSALS:

CLIMATE EMERGENCY/CARBON OBJECTIVES/B&NES FLAGSHIP POLICIES. It seems impossible that the scheme complies with the council's flagship policies on climate emergency and carbon neutrality. Most of the target group (students) are already using mass transport so any gain would be small. The classic situation of "evaporation" in an LTN will not be achieved within the "LTN" formed on North Road, because there are so few residents there - thus negligible opportunity. On the other hand, as set out above, the extra carbon burden of some of the displaced journeys is very high due to not only distance but to gradients often with the need to travel to the top of Bathwick Hill only to travel part way back down North Road or vice versa. The material impact of gradient on emissions from diesel cars – which are excluded from the CAZ charges – is of course well-known. There should at least be a plausible case on carbon/CE to even consider proceeding with a trial, but on the contrary from all available information it appears completely implausible.

BECKFORD ROAD CYCLE LANE. Selection of the Beckford Road part of the route is misguided. It involves crossing two dangerous junctions, and unaccountably provides no improvement on the dangerous heavy traffic stretch of road along Lower Sydney Place between Great Pulteney Street and the Beckford Road/Bathwick Street junction. On Sydney Place there is just a short, painted narrow lane. An image of pre-lockdown traffic at this location is here:



With cycle traffic on the inside of the left-hand lane of traffic (far lane in the above image of pre-lockdown traffic), traffic in the adjacent lane turns across in front of cyclists into

Bathwick Street. The extra box at junction won't help with that. Choice of the Beckford Road route will also push more traffic onto residential roads due to the restricted width at the railway bridge which seems bound to generate extra congestion. It seems that the extent of HGV traffic on Beckford Road pre-lockdown has been forgotten. Below is an image taken from the Sydney Gardens renovation plans on the B&NES website, which shows pre-lockdown traffic on Beckford Road in the satellite map image on which the Sydney Gardens Masterplan has been overlaid.

https://www.bathnes.gov.uk/sites/default/files/siteimages/113-801_t1_illustrative_masterplanlr.pdf



Choice of a segregated lane in this location makes it inherently difficult to address any problems that arise during the trial or to amend/improve the scheme where desired. This suggests that any trial is incapable of being a genuine trial.

NORTH ROAD BUS GATE. The closure of North Road is unjustified. The road has low traffic levels, and even more significantly much of the traffic **isn't through traffic** but is **generated by facilities on North Road itself**. Unverified data that has been quoted (albeit with inconsistencies and inexplicable variations over the duration of the consultation) clearly does not justify the closing of the road to cars. In fact, it confirms how much of the car traffic on North Road is actually associated with destinations there. Whilst the large amount of traffic to these destinations is proposed to be re-routed along longer routes with more inclines (often involving doubling back up- or down-hill), it will not be removed from North Road itself since it will be turning onto North Road on whichever side of the bus gate is its destination. Further, in the case of substantial amounts of this traffic (to KES, and parking on North Road itself) the vehicles will have to U-turn within North Road itself, creating extra risk to cyclists. If it is desired to reduce the traffic then, since it is mainly destination traffic not through traffic, the focus must be on the main North Road sources of this traffic. Thousands of car journeys daily are generated by the University's North Road entrance. With the current proposals, this traffic will still be on North Road, but will merely enter at the top rather than from the bottom. KES similarly generates a lot of traffic for short periods of the day during term-time. Meaningful consultation with KES and their neighbours about options for reducing school traffic are obviously needed but a school run for a very short period of each weekday, and only during term-time, clearly does not justify closure of

North Road to car traffic 24/7/365. The serious adverse impacts of the bus gate would not be significantly reduced by making the bus gate one-way. This would still displace unacceptable increased emissions to neighbouring residential roads and result in substantial traffic displacement.

BATH UNIVERSITY. In an Active Travel Scheme which is specifically aimed at travel to the University, deterring parking on campus and around the North Road entrance to the campus should be a starting point since this is drawing in much of the traffic on North Road. The starting point for reducing traffic, if it is necessary, should be addressing the large reservoirs of University car parking drawing traffic into North Road. Likewise, the non-RPZ parking on North Road itself is extensively used by students and should clearly be suspended in any trial.

BATH GOLF CLUB. It is implausible that any significant number of members of the golf club going to play golf will be able to carry their golf clubs on bikes. The inevitable consequence of the bus gate is therefore that members driving to the club from north or central Bath will have to drive via the top of Bathwick Hill and back half way down North Road, with substantial extra fuel use and emissions. It is obvious that a consequence of the bus gate will be to make the Golf Club less accessible and thus to impact on its viability as a business that provides exercise, fresh air and outdoor activity to hundreds of members. This is unreasonable.

IMPACT MONITORING. The proposals for impact monitoring are insufficient. It was suggested at the Active Travel webinar that the existing network of diffuser tubes is adequate. With the substantial impact expected from the bus gate that is completely unacceptable: (a) it will not produce usable data within the period in which anyone would need to raise concerns (b) this network of diffuser tubes alone is inadequate as it doesn't take account of impacts at different times of day or on different days and (c) you are not taking account of the fact that one of the roads to which much traffic is to be displaced is already identified by you in the most recent 2020 Air Quality Report as a location of concern, having NO₂ levels close to 40µg/m³ requiring particular attention. [NOTE: it is already the case that monitoring at this "location of concern" on Darlington Street falls below best practice, having just a single diffuser tube compared with triplicate tubes in other areas that you treat more favourably.] We strongly object to any suggestion that bare compliance with legal NO₂ targets is an acceptable outcome. Traffic and pollution is being transferred from a road with a few tens of homes to roads with many hundreds of homes, and residents are entitled to expect that there will be meaningful monitoring of actual impact, not merely an assumption that legal limits will not be exceeded. **We ask that local residents groups including PERA be included in meaningful discussions about the nature and location of impact monitoring that is needed.** The need for proper AQ impact

monitoring is particularly acute in this scheme due to the proposal for the bus gate with its implications for the level of displaced traffic.

DEFECTIVE CONSULTATION. The serious flaws in the current proposals could have been foreseen if local organisations had not been denied access to the original consultation, resulting in a scheme presented as a *fait accompli* with no room for meaningful consultation of local people about aspects relevant to them. It is notable, for example, that the consultation questions effectively ignore pedestrians and the disabled. Local residents groups offer the best representation for many of the people who will be most impacted by the scheme including local disabled residents, and local pedestrians, as well as incidentally many local cyclists who agree with the views expressed herein.

CONCLUSIONS. IN SUMMARY THE SCHEME IS FATALLY FLAWED AND IS UNACCEPTABLE FOR THESE MAIN REASONS:

1. **RESIDENT IMPACT.** A high proportion of North Road traffic is going to destinations on North Road and thus is not through traffic, a point the consultation fails to recognise. By failing to address traffic actually going to North Road (The University North Road entrance; King Edward's School; and Bath Golf Club) and simply diverting it via other much more heavily residential streets the plan will have very substantial detrimental impact on residents in terms of air pollution and traffic impact (congestion, traffic flow etc), including some of our members.
2. **INFLEXIBILITY DUE TO DESIGN.** By including a relatively costly segregated cycle lane on Beckford Road, the scheme is inherently made difficult to tweak and costly to remove again, obstacles to the flexibility that is essential in a genuine trial.
3. **CARBON IMPACT.** It seems inevitable to us that the scheme will be counter-productive in terms of reducing carbon/fossil fuel use and reducing pollution.

OTHER OPTIONS. We regret that the Council has not considered and discussed alternative options with local residents and organisations and we believe they should do so. For example,

- (a) A better route for travelling from Great Pulteney Street to North Road would be up the South side of Sydney Gardens, on Upper Sydney Place and then via either Sham Castle Lane/Cleveland Walk or via Sydney Road to join North Road. This would allow trial of the route without costly and laborious installation of a segregated cycle lane, and would be much more flexible and open to amendment than the proposed Beckford Road cycle lane, whilst also avoiding the need to negotiate the busy stretch of road on Lower Sydney Place having no cycle lane (with numerous heavy vehicles turning left) and the need to travel across the dangerous junction at Beckford Road/Bathwick Street. In fact, the currently proposed River Line Route already envisages crossing Sydney Place at exactly the location we are suggesting and travelling up part of Upper Sydney Place, a much better option.
- (b) The proposed bus gate must be removed from the plan.

- (c) As “beneficiary community” of the scheme, the University should surely contribute to the trial by suspending all parking in the West Car Park and other parking accessed through the North Road entrance to the campus except for Blue Badge users or others with essential need.
- (d) Non-RPZ parking (some free bays and some single yellow lines) on North Road itself also acts as a magnet to traffic into North Road and could be suspended for the trial.
- (e) North Road could be made 20mph for its entire length, and there could be a camera or other enhanced enforcement.
- (f) Options for further reducing traffic to King Edwards School could be further explored with the school community and neighbours. These could include for example extra efforts to promote school bus transport, car-sharing, cycling, walking etc; school streets.

Ceris Humphreys
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For PERA Committee

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