

## APPENDIX 2

### **SUSTAINABLE URBAN DEVELOPMENT WORK PACKAGE 6, PHASE 5: BEAUFORT ROAD AND WALLASEY BRIDGE ROAD, BIDSTON AND ST JAMES WARD – PROPOSED CYCLE AND PEDESTRIAN IMPROVEMENT SCHEME**

#### **OBJECTIONS, EXPRESSIONS OF SUPPORT AND COMMENTS ON SCHEME**

##### **OBJECTIONS (2 No. INDIVIDUAL OBJECTORS)**

Objections are detailed below:

1 The objector states that, while they support the scheme in principle which will not only link parts of the North End with Bidston Moss but will link with existing, proposed and potential cycle routes to Birkenhead Centre, Wallasey and Sea Front, Bidston Village/Tesco, Moreton and Leasowe.etc. they OBJECT to two features:

- The scheme details should be amended to give cyclists precedence over vehicular traffic crossing the cycle route at access points off the two main roads. There is room to provide for vehicles to give way without blocking the main roads. There are also other design alternatives now available in the UK and abroad to allow cyclists precedence. We really need to give cyclists (and pedestrians) top priority nowadays!
- The crossing facility at Wallasey Bridge Road to/from Bidston Moss appears to be an inadequate pedestrian refuge only. Surely this is inadequate on such a busy road, especially for children to use, and compared with the zebra etc shown on Beaufort Road.

**In response; The design of the access points along the scheme have been amended to give priority to pedestrians and cyclists over turning motor vehicles. However, unfortunately due to the proximity of the access to the Bidston Household Waste Recycling Centre there is not enough kerb length to provide a zebra parallel crossing at this location.**

2 The following comments were contained within one objection, the objector states:

- Blind and partially sighted persons may have difficulty negotiating the shared path. Listening is integral part of road safety and vehicles (cyclist) that don't make noise can be dangerous to partially sighted persons. Cycles are extremely difficult for blind and partially sighted people to see or hear, and it is not always obvious to cyclists which pedestrians are blind or partially sighted. This means that shared use areas and pathways which force cycles and blind and partially sighted pedestrians to mix present potentially serious dangers for both groups. Where cycle lanes are put onto pavements with just a painted line or a low raised hump between the cycleway and the pedestrian area this will not be detectable for most blind or partially sighted people, using their feet, a cane, or the help of a guide

dog to understand where the pedestrian walkway starts and ends. When key aspects of the public space become inaccessible in the way proposed, blind and partially sighted people are no longer able to safely make independent journeys. These designs create a range of mobility and personal safety issues for blind and partially sighted people, who are faced with having to locate the cycle track, which is often not detectable, and then find a safe way to cross by interacting with cycles they cannot see or hear approaching within the shared use area.

The Government's 'Gear Change' document calls for segregation between cycleways and pedestrians and for no new shared space developments. It states: "New cycle provision which involves sharing space with pedestrians, including at crossings, will no longer be funded. Again, we want many of the existing facilities to be upgraded with physical separation." We also note the 'Gear Change' calls for cycles to be classified as vehicles, as a distinct category from pedestrians. Segregation should be detectable so that they can easily be felt underfoot or with a cane. The standard height kerb in the UK is 125mm. Research shows that kerbs and segregation less than 60mm are unlikely to be detectable to people with sight loss, but RNIB urges planners and designers to go beyond the basic minimum – the more detectable essential safety features are the better they are able to do their jobs.

73 per cent of respondents to a survey carried out by RNIB to inform our response to the Department for Transport Accessibility Action Plan stated that they were not confident sharing paths and spaces with cycles (RNIB, 2017).

**In response; The Sustainable Urban Development Funding for this scheme was agreed and approved before the new guidance on design of pedestrian/cycle path was formally introduced. This scheme will introduce a new path along a section of land that is currently overgrown and unused. However, the width of the available land for the project is restricted and can only accommodate a shared path. Following a meeting with the objector the design of the vehicle accesses have been amended in accordance with the latest guidance. The scheme will be closely monitored, and segregated facilities may be carried out as part of a future scheme.**

- Designs such as this require people who cannot see to work out who has priority, negotiate their right of way, positioning oneself correctly, relative to cyclists' position and intended direction of travel to avoid contact. Calculating one's position in such spaces will be far more complicated and prone to error, increasing risk for blind and partially sighted people. Because continuous footways and raised/speed tables remove the detectable kerbs which blind and partially sighted people rely on to know where the pavement is and where vehicles are moving, as well as for wayfinding purposes we ask that any proposal to install them is withdrawn. When detectable kerbs are removed, it significantly increases the chances of people with sight loss unknowingly walking into the path of moving

vehicles (and colliding with stationary vehicles), and therefore significantly increases the chances of collisions. Removing detectable kerbs also removes an important wayfinding tool used by blind and partially sighted people to find their way. Guide dogs are also trained to guide from kerb to kerb. Kerbs are detectable when they can easily be felt underfoot or with a cane, less than 60mm are unlikely to be detectable, the more detectable essential safety features are the better they are able to do their jobs. Kerbs only work for blind and partially sighted people and guide dogs when they are detectable in this way, because feet, canes and guide dogs are may not pick up on colour or texture change.

For the reasons outlined above we would object to any proposal that includes installation of shared use spaces, cycle lanes without detectable segregation.

**In response; The shared path will have identifiable kerbs and consideration has been taken when siting street furniture.**

- There is a risk of a blind or partially sighted individual suddenly and unknowingly stepping into the path of a cyclist or vehicle, without the motorist or cyclist realising the pedestrian hasn't seen them. The risk of mobility aids such as white canes interfering with the wheels of bicycles is a further risk to physical safety of both cyclists and pedestrians.

**In response; Since our meeting with the RNIB changes have been introduced with the Highway Code which further reinforce the priority of pedestrians at vehicle accesses and side roads. At present there is no footway or cycleway at this location. A 3.5metre shared use cycleway/footway is proposed.**

**Rule 62 of the Highway Code states that cycle tracks are routes for cyclists that are physically protected or located away from motor traffic, other than where they cross side roads. Cycle tracks may run alongside footpaths or pavements and be separated by a feature such as a change of material, a verge, a kerb or a white line.**

**You MUST keep to the side intended for cyclists as the pedestrian side remains a pavement or footpath. Some cycle tracks shared with pedestrians will not be separated by such a feature. On such shared use routes, you should always take care when passing pedestrians, especially children, older or disabled people, and allow them plenty of room. Always be prepared to slow down and stop if necessary.**

**Rule H2 of the Highway Code states that cyclists should give way to pedestrians on shared use cycle tracks and to horse riders on bridleways.**

- We seek reassurance that any "landscaping along the length of the scheme that considers site conditions and designed to ensure that planting thrives in the future" will take into consideration the impact on accessibility such as obstruction to lines of travel for disabled and blind and partially sighted people as street furniture and a potential for overgrowing vegetation pose a risk to safe independent travel.

**In response; The landscaping will be maintained via the contract for 3 years following installation. After this period the landscaping areas that will become adopted as Wirral Council highway will then be managed by Wirral Council maintenance programme. The areas that remain in Peel Holdings ownership will be maintained by Peel Holdings. Continual monitoring will be carried out to ensure that lines of travel are not obstructed by overgrown vegetation.**

- Cycles should be treated as vehicles and not as pedestrians and that at crossings and junctions, cyclists should not share the space used by pedestrians but should be provided with a separate parallel route and where cycle routes cross pavements, a physically segregated track should always be provided as identified in the Government's 'Gear Change' document published last year.

Clarification about the plans for "a zebra crossing on Beaufort Road which will provide connectivity to the new cycle lane that is being installed as part of the housing development proposal on Illchester Road". The purpose of a pedestrian crossing is not only to provide a safe route across a cycletrack or road, but to provide an auxiliary aid that says when it is safe to cross for people who cannot visually detect the presence or intentions of other road users.

Controlled, Pelican, crossings are the safest and most accessible because they include traffic lights to stop the traffic and push button boxes to request traffic to stop. They also use sound and touch (audio pips, and rotating cones underneath the push button boxes) to let people know when it's safe to cross. Dropped kerbs and red blister tactile paving also help people with sight loss locate these accessible crossing points.

Other types of crossings like zebra and courtesy crossings (like Copenhagen crossings) are much less safe and should only be used as additional crossing options to accessible controlled pedestrian crossings. Crossings which create level surfaces or continuous footways from pavements across roads are also not safe or accessible and should not be used.

Toucans as a crossing shared by pedestrians and cyclists pose similar, if not greater, risk and safety concerns as described above, as shared use areas, to both. We believe that a parallel crossing should be installed as it provides segregation and will make crossing safer for pedestrians and cyclists alike. There is an inherent 'danger zone' with this design which is normally avoided via visual communication between the pedestrian and the cyclist approaching or near the crossing.

Toucan crossings and open areas where everyone is expected to cross when appropriate such as in a shared space or shared use area, rely on pedestrians and other road users regulating their movement principally through visual communication.

**In response; The 'zebra crossing facility on Beaufort Road is a parallel crossing and complies with design standards within the LTN1/20**

**Cycle Infrastructure Design Guidance (often called a Tiger crossing). This crossing facility segregates cyclist from pedestrians. The use of this crossing will be monitored to help inform of the need for further upgrade to a controlled crossing facility.**

- The objection states that, in addition to the Equality Act 2010, there is a clear requirement to ensure disabled people are properly consulted about proposed changes to the street environment, as set out in Department for Transport guidelines. There is concern that blind and partially sighted people may be excluded from participating in the consultation process due to the lack of accessible information. For information to be accessible to blind or partially sighted people, it needs to be provided in a format they can read. Typically, this will include large print in a font size ranging from 16 point upwards, to spoken word on MP3 or CD, or in braille format, or an accessible electronic format such as a plain text document or an accessibly formatted Word document, or a tagged PDF with text-described diagrams and maps. We are also concerned that for the reason described above the current consultation potentially breaches 'The Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018. <https://www.legislation.gov.uk/uksi/2018/952/introduction/made> The objection asks please can you confirm how the consultation process, including but not limited to the website, make the full range of information accessible to the section of the public with sight loss? We are also concerned to know how many people with sight impairments directly contribute their views to this consultation?

**In response; Wirral Council acknowledges the content of this objection. Officers have since met with the objector to explain the proposals in greater detail and to discuss how to ensure Wirral's consultation processes are more inclusive moving forward. Wirral Council is working to make all its engagement and consultation exercises as accessible as possible and welcome input from all sections of the community. More recently, Wirral Council has implemented a new consultation and engagement toolkit with style guides to bring consistency across services when formulating public consultations. We can offer information in different formats upon request, and we acknowledge that people may need information in different ways. Wirral Council recognises that the consideration of equality implications is an ongoing obligation that form an important part of policy formulation and decision making. Wirral Council currently consults with the North West Campaigns Officer of The Royal National Institute of Blind People. However, Wirral Council welcomes input from all sections of the community and hopes that future improvements to consultation processes previously referenced, along with greater use of the online "Have Your Say" facility will help ensure this.**

- Can a copy of the Equality Impact Assessment be provided?

**In response; An Equality Impact Assessment relating to the proposals is included as part of this report. The EIA has been discussed with the objector.**

## **EXPRESSIONS OF SUPPORT AND GENERAL COMMENTS (7 NO. INDIVIDUAL SUPPORTERS)**

- 1 The comment states that, the design shows vehicle access across the proposed shared use path. Please confirm that pedestrians and cyclists will have priority over cars and other vehicles at these points. Priority is required to make the installation safer and feel safer for new and inexperienced cyclists and pedestrians

**In response; The design of the access points along the scheme have been amended to give priority to pedestrians and cyclists over turning motor vehicles.**

- 2 The supporter states: It looks great! Can we ensure that people walking and riding have priority at junctions, especially those for vehicle access? Drivers should have to give way at these points. Looks good though.

**In response; The design of the access points along the scheme have been amended to give priority to pedestrians and cyclists over turning motor vehicles.**

- 3 The supporter states: I'd like to register my support for the scheme. Improved cycling infrastructure will encourage more people to cycle on the Wirral.

**In response; noted.**

- 4 The supporter states: Great to see improvements in the offing around this area, I'm generally very supportive of these plans and the wide paths and verges seem reasonable in the circumstances. I suppose the only point I'd make is around the crossings- traffic speeds on Beaufort road are often way in excess of the limit and the volume/types of vehicles on Wallasey Bridge road make it quite difficult to cross in my (albeit limited) experience. Is a zebra and a refuge sufficient to cover this? I daresay these could be improved in future if need be, and perhaps budget constraints are involved.

**In response; The scheme will be monitored closely following completion and further amendments/improvements will made if necessary.**

- 5 The comment states that, The cycleway proposed would be a link in a proposal that might not have been recorded formally about 20 years ago, to link up the cycle track on Beckwith Street to Wallasey. Since then one cycling officer, Cathy McNulty, gave the opinion that if that route were to be designed again, with later experience it would not be made as a separate track, but cyclists could be expected to share with general traffic, which is very low there. It is to be hoped that much more connection can be made soon, though that is not the

leading priority for me or for MCC. However, I should point out how far this proposal has progressed so far, and if you search under the shrubs at the roundabout that have grown where it looks (to me) as though the new proposed track is to be made, you should find some markings that were made in anticipation of the route to Wallasey.

My main comment is on the width of the cycleway/footway. 3.5 m is a fair width for a cycleway separated from a carriageway, though I would like to see a larger one to accommodate two cyclists riding abreast meeting another two riding together in the opposite direction and passing comfortably. Accepting the proposed width, a few pedestrians can be accommodated comfortably. It would help if they are advised to keep left, which could take the form of road markings. This is a point I could expand on another time.

This view is based on the present expected use of the route as a connection between Birkenhead and Wallasey. But if much local development is to take place generating more local traffic, especially walking, then a greater width would be needed. It seems that more development could take place near Birkenhead North station. So perhaps the possibility of a larger path width being needed in the not so distant future should be taken seriously, with more space being reserved of the path.

**In response; Due to limited land available to introduce the scheme the maximum width of path we could achieve is 3.5 metres and as a result we could only achieve a shared pedestrian/cycle path design. This is below the widths suggested in the LTN1/20 Cycle Infrastructure Guidance document for 2 way segregated pedestrian/cycle paths.**

- 6 The comment states that, As a cyclist who cycles this route and been the subject to 2 near misses on the bend at Beaufort, will the route continue to the custody centre at Cavendish rd.  
Also what about proper ramped access to the Bidston old tip site which is part of the local cycle route, my good friend uses a hand cycle to get onto the old tip site but can only access it from the Bidston end as he is a wheelchair user

**In response; This scheme does not extend to the Custody Centre however, it will link into the proposed cycling improvements along Price Street as part of the SUD WP7 scheme linking Bidston to Birkenhead. There is a proposed island and dropped kerbs to connect the Beaufort Road/Wallasey Bridge Road scheme with the cycle path at Bidston Moss.**

- 7 The comment states that, Several questions on this design:  
Does the shared use cycleway meet LTN 120 requirements?  
Do you have a copy of the Equality Impact Assessment?  
I'm especially worried about the fact that the cycleway is no longer continuous and how that could impact vulnerable populations, who might find the crossing point difficult to navigate with cars travelling at some speed down that road? A reasonable adjustment to navigating this danger would be a continuous route down the side of that road, without the need for a perilous crossing.

**In response; The funding for this scheme was approved prior to the introduction of the LTN1/20 Cycle Infrastructure Guidance document and unfortunately, there is not enough land available to widen the originally proposed scheme to provide a segregated pedestrian/cycle path. A Equality Impact Assessment has been carried out and a copy of the document forms part of appendix 3. The proposed scheme at Beaufort Road/Wallasey Bridge Road links the existing pedestrian/cycle route through Bidston Moss with the proposed improved cycle facilities at Price Street.**

- 8 The request asks for confirmation that access to premises to allows two way traffic and parking spaces for customers be maintained due to concern that any changes being made will have a negative effect on business. The enquiry asks for assurances that all necessary measures are taken to maintain the infrastructures that are currently in place that allow this site to operate with extremely high levels of safety, and also provides the flexibility required for us to continue to provide the highest levels of service and standards to both our existing and newfound custom and requests a copy of a detailed drawing of the access.

**In response; A copy of a detailed drawing of the access was provided and assurance that 2 way access will be maintained. The area of parking is outside of the new highway boundary and isn't affected by the scheme.**