

Appendix 6 – Written responses

MerseyTravel – Received via email

Initial Merseytravel Comments on the WMBC LCWIP Proposals

As Set Out in Consultation Documentation November – December 2023

Merseytravel would wish to thank WMBC for the opportunity to comment upon the proposed Active Travel Measures, as set out in the 'LCWIP' consultation documentation, presented to the public, with the objective of seeking the expression of views in response to the outline plans for the project, during November and December 2023.

As all relevant Merseytravel Departments have now had the opportunity to examine the proposals contained within the consultation exercise documentation, Merseytravel can now offer the following initial comments, in response to the consultation exercise.

In general terms Merseytravel is supportive of the overall objectives of the project, and the majority of the measures included within the outline plans. It is additionally Merseytravel's view, that the introduction of a coordinated programme of initiatives, designed to improve walking and cycling, along one of the principal Birkenhead –Liscard corridors, will benefit the promotion of sustainable transport use, including public transport, if the measures are suitably integrated with the current public transport network, together with any enhancements to the same network that are likely to be delivered in the immediate future.

Whilst recognising that the current plans are at outline stage, in order to ensure that this last mentioned objective can be satisfied by the 'LCWIP' project, Merseytravel would wish to see some revisions or further specific collaborative design work undertaken, in the following areas.

Egerton Wharf and Egerton Bridge - whilst Merseytravel understands the rationale behind proposals to make this highway 'one-way', for general traffic, in order to incorporate high quality cycle priority along the route, to 'future-proof' the potential public transport network serving the Wirral Waters Development, Merseytravel would wish to see to facility for buses to operate in both directions along this route to be available in the future, Although this may not be immediately required, economic development levels on the Tower Wharf area may require the introduction of such a facility in the short to medium term.

Wheatland Lane – Whilst most of the measures proposed for this highway are generally supported, as the outline plans do not include all of the full detail for the required bus stops on this section of route, Merseytravel would wish to work with WMBC to revise and finalise appropriate detailed plans for all required bus stops on Wheatland Lane.

Mainwaring Road – Merseytravel notes the proposal to close Mainwaring Road at its Northern junction and create a 'quiet street' along the length of the Road. This would require diversion of bus services to the parallel Liscard Road route. Whilst Merseytravel has no objection to the closure of one end of Mainwaring Road, or the creation of a quiet street, and the diversion of bus services, providing the diversion route is wholly appropriate, it remains Merseytravel's view that the project's objectives should be reached via the closure of the southern junction on Mainwaring Road. This latter option would greatly simplify the Mainwaring Road, Poulton Road, Wheatland Road junction thereby allowing a degree of compensatory bus priority to be introduced to the junction. If this option cannot be achieved, as indicated in previous discussions, Merseytravel would wish to see some alternative bus priority introduced as part of the project, to compensate for diversion of services via Liscard Road.

Liscard Road - Whilst most of the measures proposed for this highway are generally supported, as the outline plans do not include all of the detail on the required bus stops on Liscard Road, Merseytravel would wish to work with WMBC, to revise and finalise appropriate detailed plans for all required bus stops on Liscard Road.

Notwithstanding the above detailed comments, Merseytravel looks forward to working with yourselves, on the further development of the LCWIP proposals in due course.

In the meantime, should you require any clarification of the above comments, please do not hesitate to contact us.

LCWIP Birkenhead to Liscard Active Travel Project



Public Consultation

Birkenhead to Liscard, Wirral

October 2023

Dear Simon,

Please see the below comments in respect of the proposal for an active travel route between Birkenhead and Liscard. Merseyside Police are pleased to work with Wirral Council in order to ensure that the proposal prioritises public safety, road safety and helps to reduce the potential for crime, disorder, and anti-social behaviour.

Traffic Management Unit (TMU)

This is an ambitious scheme that will take a significant period of time to complete. There are concerns surrounding the anti-social use of pedal cycles; e-bikes and e-scooters and concerns remain the same. Along with the Disability Discrimination Act 1995 (DDA) it is becoming increasingly difficult for Local Authorities to negate these issues.

With regards to the presentation the TMU note that it is devoid of signage and at this stage of the project there are no technical drawings to support analysis such as swept path for Large Goods Vehicles (LGV). The start refers to the existing Chester Street Active Travel Route – has this been installed recently and if so the TMU is unaware of it and have not had sight of it. Further observations are as follows: -

Taylor Street - One way traffic towards Cleveland Street with designated parking bays with a footway built out to accommodate them on the east side of the road and the new cycle path on the west side.

Concern: Potential for LGV's turning left exiting George Street to cross into the path of cyclists travelling in the opposing direction along Taylor Street causing a risk of injury or death.

- a. Has any swept path analysis been carried out to ensure this is not the case?
- b. Junction with Bridge Street as above?

Canning Street - Westbound approach to the ATS junction with Egerton Wharf is currently 2 lanes; 1 lane ahead only and 1 lane right turn only.

Query: Is this junction layout changing to accommodate the cycle path from Taylor Street as suggested in the presentation?

Kelvin Road - Westbound approach to the ATS junction with Egerton Wharf is currently 2 lanes; 1 lane ahead only and 1 lane right turn only.

Concern: Where are the displaced vehicles going to park when the scheme is installed?

Mainwaring Road - Will be designated a 'Quiet Street' and Liscard Road will become the through road.

Query: Will there be a change of priority or junction layout at the Liscard Road junction with Brougham Road?

Liscard Town Centre - Designated as a 'safe access' for shared usage.

Query: There are longstanding issues with cycle use through the pedestrianised area with complaints of anti-social and reckless riding being reported on a regular basis. There are current regulations in place to prohibit cycling for this reason. Further information is required as to how this area will become a 'safe access' area.

Designing Out Crime Unit (DOCU)

The DOCU would like to offer some brief comments based on the available information at this time which relates to the initial proposal and past experiences with the implementation of active travel routes across Merseyside.

Access and Movement

1. The proposal has been designed with public space and movement through public space in mind, for pedestrians and cyclists. This forms part of Wirral Council's long-term plan to promote active travel and reduce the number of vehicles on public roads. This will be appreciated by users of the space but may result in several routes becoming highly congested spaces.
2. Roads such as St Paul's Road, a built-up residential street and Liscard Road, a main arterial route will likely see an increase in vehicles parked in unsuitable locations. Has any consideration been given to long-term education and enforcement, or will this be left for Merseyside Police to manage in regard to obstruction offences?
3. Proposals for Duncan Street on to Hamilton Square and Taylor Street with a contra-flow lane for cyclists will make the space difficult to police, particularly in relation to tackling anti-social behaviour (ASB) riding on pedal cycles, e-bikes, and off-road bikes. This is difficult to remedy however, good surveillance opportunities should look to be incorporated across these routes, through the use of lighting and CCTV which will help to deter offenders and identify and target those responsible for crime and ASB.
4. It is positive that emergency vehicle access has been considered in several areas of the proposal which include Mainwaring Road.
5. There are long-standing problems with Liscard Way which will no doubt transfer onto the proposal. There is on-going partnership work with Wirral Council, Merseyside Police, and businesses across central Liscard to encourage change and formulate an alternative approach. Future recommendations from the Liscard Partnership Place Subgroup will look to have a positive impact on this proposal.

Structure

1. As referenced by the TMU, there are concerns in relation to Large Goods Vehicles and how this may increase the risk of a road traffic collision involving cyclists. It is essential that all roads, cycle ways, street furniture and landscaping features be constructed and maintained to a high standard to prioritise road safety and create an aesthetically pleasing space.

Surveillance

1. To support natural surveillance opportunities a thorough lighting strategy through the use of light emitting diode (LED) units is recommended which will ensure a full, even coverage of light throughout the hours of darkness. This will help to alleviate a fear of crime, particularly in relation to lone females/violence against women and girls (VAWG) and gang culture in relation to ASB.
2. Where possible, new CCTV units should look to be incorporated sporadically along the travel route. This will help to reduce the fear of crime and will help to identify and prosecute offenders of crime.

Management and Maintenance

1. It is important that the public realm be regularly serviced; with bins emptied, green space maintained and any damage being either repaired or replaced to discourage the early stages of the 'broken windows theory'.

Community Policing Teams

Due to recent operational demands and the imminent Operation Bangor period for Halloween and Mischief Night, it has not been possible to brief local policing supervision. Arrangements have been made for the DOCU to brief local policing supervision in mid-November. Any comments or feedback from the Community Policing Teams will be provided prior to the 4th of December deadline.

The TMU and DOCU would welcome the opportunity of participating in any future meetings or discussions you may have concerned with this proposal.

Royal National Institute for Blind People – Received via Have Your Say

[LCWIP Birkenhead to Liscard Active Travel Project | Have your say Wirral](#)

This response is made on behalf of RNIB, the Royal National Institute for Blind People.

This consultation is worryingly inaccessible for blind and partially sighted people.

Ensuring all blind and partially sighted people are treated the same as sighted members of the public, including how they are expected to interact with relevant information, is a central concern for RNIB. Public consultations must never be in formats that are difficult or impossible for sections of the community to engage with; they must communicate in formats that are readable to everyone, including people with sight loss. The community members who experience difficulty in engaging with consultations are some of the people most affected by changes to the built environment.

This consultation is inaccessible because it requires internet access (which blind and partially sighted people are twice as likely to lack as the sighted population), the navigation of a website which is more difficult to navigate for users screenreaders and magnification thanks to its forms, tables, and radio buttons, the creation of a user account, and most worryingly of all: the consultation details are presented only in a video that has no audio description so anyone who cannot see the video is left unsure of what is being proposed. Not all the text that appears as subtitles is spoken.

Phrases like “an upgraded crossing will be provided” are used, but with no further details given of the nature of that crossing – and crossings are one of the most important parts of street design for people with sight loss, who depend on tactile paving, dropped kerbs, signalised crossings, and other features to safely cross vehicle routes.

“Careful use of materials will blend the route with the historic setting” in Hamilton Square is concerning language as this indicates may not be colour contrast or detectable kerbs between routes for pedestrians and routes for any moving vehicle, including cycles and e-scooters.

Bicycles can be difficult or impossible for blind and partially sighted people to see and hear because they are unpredictable, agile and silent. This makes cyclists difficult to detect. Without physical segregation, blind and partially sighted people risk unknowingly stepping into the path of a cyclist, e-scooter or other micromobility vehicle. Mobility aids such as white canes may interfere with the wheels of bicycles, presenting a risk to the physical safety of both cyclists and pedestrians.

Blind and partially sighted people are reporting self-exclusion from shared use areas, avoiding areas where cyclists are not physically segregated from pedestrians. Even when a new shared-use design has been introduced along a route which they previously felt comfortable navigating, they now judge it safer to avoid that area. RNIB has received reports of significant physical injuries (including broken bones) and lasting psychological damage, both to blind and partially sighted people and guide dogs.

One of the subtitles which is not read out is "Cycle route demarcated by surface materials only," which is extremely concerning as this would result in a route unsafe for pedestrians with sight loss. Physical segregation between pedestrians and cyclists is the only means to maximise the safety of blind and partially sighted pedestrians.

"The crossing will be improved for easier pedestrian and cycle access" again gives no indication of what form these improvements will take, and may not allow due consideration of the differing needs of pedestrians and cyclists at a crossing.

"Existing shared use route on Tower Road to be used" is also concerning to see in the subtitles but not hear spoken. Shared use is a particular hazard for people with sight loss and can even lead to self-exclusion, as already stated, which is counter to the active travel aims of making routes more welcoming to pedestrians.

"Kelvin Road junction will be improved for easier use by pedestrians and cyclists" again gives no indication of the improvements blind and partially sighted pedestrians can expect.

"The route will be designed to allow access to and from all businesses and side roads" does not give any detail of whether and how that access will apply to pedestrians with sight loss.

The new cycle track on Wheatland Lane with parking spaces including blue badge holders means it is extra important for this cycle lane to be segregated from pedestrians and allowing safe crossings near the parking bays so that blind and partially sighted blue badge holders will be able to safely get to and from the relevant parking bays.

There is again no indication of how the pedestrian crossings at Church Road and Church Crescent will be "improved," and whether that improvement will also improve safety for pedestrians with sight loss.

The shared-use area on the left side of Wheatland Lane is disappointing; we appreciate limited space is often the reason given for this but it is notable – and disappointing – that even in a scheme to reduce car speeds and volumes,

cyclists must still share the footway with pedestrians rather than the carriageway with motor vehicles.

It is not at all clear how the Wheatland Lane junction will be “improved to assist pedestrians and cyclists.”

Where it says “At this bus stop...” it is not clear which bus stop is meant, and “...pedestrians and cyclists will share the space” is particularly concerning for RNIB as we regularly receives reports of the confusion for all user groups over right of way at bus stops which include shared space with cyclists.

Since blind and partially sighted people are not able to drive and often face challenges walking around the built environment, they rely on public transport, buses in particular, as a primary means of travel. If bus travel becomes less accessible, people can be left with the choice of expensive private hire vehicles or being completely unable to make their journeys. Bus stop designs that include cycle lanes create a range of mobility and personal safety issues for blind and partially sighted people. Everyone’s risk of serious collisions is increased when bus passengers needing to negotiate with fast-moving cyclists and e-scooters to access buses and stops. Blind and partially sighted people report feeling unsafe, anxious and vulnerable to collisions with bicycles, which makes it difficult or impossible to access bus services at stops that also include shared space with cyclists.

Soon after, again we hear “At this bus stop...” without any indication of which bus stop it is. Here, it continues “...the cycle lane will pass behind the bus stop. Even with a dedicated cycle track, which should be delineated from the footway by a detectable kerb of at least 60mm and good colour and tonal contrast with the surrounding footway, the same problems are still found as with the shared-use bus stop.

No details are given on how the junctions on Liscard Way being “simplified” will affect pedestrians with sight loss.

It is not clear how “improvements to the appearance” of Liscard town centre will provide “safe access and use by pedestrians” with sight loss.

Again, “Cycle route demarcated by surface materials only” is not read out, and such a demarcation would result in a route unsafe for pedestrians with sight loss, leading to their potential exclusion from an area meant to be more inclusive. Physical segregation between pedestrians and cyclists is the only means to maximise the safety of blind and partially sighted pedestrians.

It’s also difficult for an organisation to respond to such a consultation; an individual account must still be registered, and there is no means to submit information via this web page without being presented with questions about

individual opinions and the mode of travel personally used for short journeys. Some of these questions are optional but the means of distinguishing them, an asterisk, is not always clear to people with sight loss.

If you would like to consult further with us on any of these issues, please get in touch.

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