

TRAFFIC & NETWORK MANAGEMENT

Bradford on Avon Historic Core Zone

Report on Consultation on Restricted Parking Zone (RPZ)

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1.0 Purpose of report

1.1 To set out the responses received following the recent advertisement of the Restricted Parking Zone in Bradford on Avon as part of the overall Historic Core Zone project and to respond to comments received on the wider Historic Core Zone proposal.

2.0 Background

- 2.1 The Historic Core Zone (HCZ hereafter) scheme in Bradford on Avon has been designed based on the principles of other HCZ schemes around the UK and has taken into account the individual characteristics and layout of the town. The scheme has changed and developed as a result of consultation and discussion and input from the Historic Core Zone Working Group. The dominance of vehicular traffic in the town is identified in the most recent Joint Strategic Assessment as a key issue and the HCZ scheme is outlined as one of the ways to help reduce this problem.
- 2.2 In 2010, transport consultants, Colin Buchanan, held two workshops with key stakeholders in Bradford on Avon to enable them to develop a preferred design solution for the HCZ. The first workshop looked at issues, ideas and suggestions for the HCZ. The second 'Design Options' workshop considered a number of potential solutions and allowed the consultant to identify the technical design options and urban design elements favoured by stakeholders.
- 2.3 Colin Buchanan were able to draw on a number of previous consultations that have taken place in the town, e.g. the Taming the Traffic workshop and the Priority for People initiative, as well as a wide variety of statistical data made available to them, such as traffic count and speed data. All households in BoA were sent a leaflet showing the proposals drawn up by Colin Buchanan. Both the Area Board and Bradford on Avon Town Council gave their support for the proposals in the summer of 2010.
- 2.4 Wiltshire Council later commissioned consultants, Mouchel, to progress with the design of Phase 1 of the HCZ project at the Market Street/Church Street junction. In September 2012, a targeted consultation was undertaken to gather the views of vulnerable and disabled groups so that their comments could be incorporated into the scheme design process. As a result of this consultation exercise, the plans were amended to take into account the comments received.
- 2.5 In January 2013, further consultation with the wider public was undertaken and three public exhibitions were held. In March 2013, both the Area Board and Town Council gave their support for progression of the scheme with amendments to include making the proposed informal pedestrian crossings more prominent in the scheme and including more informal crossings at the top of Market Street.
- 2.6 One aspect of the overall HCZ is the introduction of a Restricted Parking Zone (RPZ hereafter). An RPZ allows for the removal of many marked parking restrictions and assists in a reduction in street clutter. The Traffic Regulation Orders (TRO's) for the proposed RPZ have recently been advertised for public comment.

3.0 Response to consultation

- 3.1 As is to be expected with a scheme that provides great local interest, many of the comments received refer to the wider HCZ proposals and do not just contain comment to the advertised TRO's. Whilst the TRO process can only consider objections and support to the RPZ proposals it also provides the opportunity to give final consideration to any other comments made on the wider concept of the HCZ. Therefore, all comments made, whether in direct relation to the advertised RPZ or the wider HCZ, are considered in this report.
- 3.2 In total, 9 items of comment have been made in relation to the RPZ with 30 items of comment being made about the HCZ. A summary of the comments received in relation to the RPZ, and where considered appropriate, officer responses, are included at Appendices 1 and 2. A summary of the comments received in relation to the HCZ, and where considered appropriate, officer responses, are included at Appendices 3 and 4.
- 3.3 In addition, two petitions have been received. The first requests that the existing zebra crossing in Market Street be retained in the HCZ scheme and has 1,172 signatures, with the second expressing support for the HCZ as proposed and has 401 signatures. Copies of the petition front pages are included at Appendices 5 and 6.

4.0 Substantive comments on RPZ

4.1 Removal of road markings

Comment is made that removal of road markings (yellow lines) will confuse the motorist as they will not know where they can park. The comment continues by stating that single and double yellow lines and white lines are a code system understood nationwide and by foreign visitors and that new proposals are experimental, and likely to cause congestion through being misunderstood.

The RPZ and the way it is signed and marked is not an experiment. RPZ's are a DfT approved way of controlling on-street parking and waiting and have been used in many areas of the country. It is accepted that there will be a period of time when the public will need to get used to the new restrictions but RPZ's have been used successfully in other parts of the country.

4.2 <u>Legibility of Zone entry signs</u>

Comment is made that the notices announcing the 'restricted parking zone' at the Inner gateways of the HCZ may not be easily read by the drivers of vehicles, who have other demands on their attention at the same time and that it is too far to walk back up to the gateways to check the rules, once the driver is trying to park.

The Traffic Sign Regulations and General Directions (TSRGD) 2002 and subsequent amendments govern what signs can be erected on the public highway and in which circumstances they may be used. The proposed entry signs conform to the TSRGD and are consistent with other RPZ's elsewhere. Where parking is allowed within the RPZ the locations will continue to be shown with road markings and be positively signed.

4.3 Number of signs

Comment is made that the RPZ would require a significant number of parking allowed signs which appears to fly in the face of another objective, namely that of de-cluttering the streets of the town.

With the exception of the zone entry signs the number of signs required for a RPZ is comparable with the number of signs used for the conventional signing of parking and waiting restrictions. The benefit of a RPZ is the ability to remove all yellow lines from within the zone. In deciding to include a RPZ as part of the overall HCZ the Working Group took the view that the removal of all yellow lines was of benefit and helps with de-cluttering.

5.0 Substantive comments on HCZ

5.1 Removal of the zebra crossing, replacement with informal crossings and safety

The informal crossing points are designed to provide greater connectivity and meet existing and potential future pedestrian desire lines. It has been identified that pedestrians presently cross the road where it suits them, rather than detouring to a designated pedestrian crossing. The informal courtesy crossings are expected to work in the same fashion as a zebra crossing, with drivers expected to give way to pedestrians. This is the same approach to that used successfully in the HCZ in Shrewsbury and in shared space schemes elsewhere in the country.

The tested premise is that by removing the more familiar and formal elements of highway infrastructure, such as a zebra crossing, drivers proceed more carefully and cautiously. The use of high quality visually distinct materials, gateway features and signage will ensure drivers are aware they are entering a special environment and encourage awareness of their surroundings and other road users, especially pedestrians. This approach, coupled with a reduction in carriageway widths, raised tables and informal crossing points will help to ensure vehicles are travelling at a low speed.

The retention of the zebra crossing at Market Street is likely to make many other elements of the scheme ineffective. For example, by removing the more familiar and formal elements of highway infrastructure, such as a zebra crossing, drivers proceed more carefully and cautiously. By retaining the zebra crossings, drivers are much less likely to respond in this way, in turn making the courtesy crossings less effective. A judgement would need to be made on whether the scheme would therefore be successful in meeting its objectives if the zebra crossing was included.

5.2 Impact of the scheme on traffic and congestion

The traffic modelling tool VISSIM has been used to assess the proposed HCZ scheme. The proposals are not expected to create an unacceptable impact on the capacity of the road network as the scheme can accommodate the current levels of traffic demand. It is expected, however, that the reduced carriageway widths, change in surface treatments and additional pedestrian crossing points will results in some longer journey times for vehicular traffic. However, it should be borne in mind that the volume of pedestrians is not overwhelming, so the impact of drivers allowing pedestrians more time and courtesy is not expected to have too great an impact on journey times. Shifting priority from vehicles to pedestrians will also act to calm the traffic and make it less desirable to drive through the town. This may lead to some natural reduction in traffic flows either through migration to other routes or alternative modes of transport.

5.3 Impact of the scheme on air quality

The traffic impact of the scheme is deemed to be neutral as it can accommodate the current levels of traffic demand and may lead to some natural reduction in traffic flows either through migration to other routes or alternative modes of transport. On this basis and following discussion with the Council's Air Quality team it was decided that no modelling would therefore be necessary.

5.4 Equalities impact

An Equalities Impact Assessment was undertaken in December 2012 and highlighted two particular aspects of the HCZ scheme as having potential adverse impacts for disabled people in particular. This was identified through consultation carried out with a number of disability groups and disabled individuals during September and October 2012. These issues were:

- (i) Delineation of the footway and carriageway in the raised table areas in the scheme.
- (ii) The removal of the zebra crossing on Market Street with replacement via a number of informal crossings

In response to these concerns the design of the scheme was amended to improve the conspicuity of the informal crossings and by the use of contrasting materials to define the edge of the carriageway and the footway. A further review and update of the EIA is currently being undertaken to ensure that it remains appropriate. The EIA is considered to be a live document and subject to continuous review in order to inform the final design.

6.0 Conclusions

- 6.1 Although promoted as part of the overall HCZ the RPZ is a standalone proposal that could be installed with or without the HCZ.
- 6.2 The objections received to the RPZ are not considered to be sufficient to withdraw or change the proposal. Whilst it is accepted that a period of time will be required for motorists to become used to the new form of restrictions there is no reason to consider that overall compliance will not be achieved as familiarity grows.
- The TRO consultation has provoked a wider response to the more general issues relating to the HCZ. These representations will be used to help and inform decision making in that regard.

RPZ Support

	RESPONDEE	<u>COMMENTS</u>	OFFICER COMMENTS
S1	Bradford on Avon Preservation Trust	I am writing to express support for these orders. The Restricted Parking Zone is an important element of the Historic Core Zone (HCZ) in Bradford on Avon. It will allow the street scene to be enhanced by removal of unsightly yellow lines while maintaining quite clear indications of where parking is permitted. The HCZ is a strategy developed over many years for redressing the balance between motorists and pedestrians/cyclists in Bradford on Avon aimed at making the centre of the town more pleasant to walk/cycle in and thereby to increase the number of people choosing to stroll around, increasing footfall in shops, restaurants and other attractions in the town.	Comment noted.
S2	Resident of Meadowfield, Bradford on Avon	(RPZ COMMENTS) I'm writing in support of the TRO. Whilst I'm a Stakeholder member of the Air Quality Alliance Steering Group set up by Wiltshire Council, and a Director of Climate Friendly Bradford on Avon, I'm writing here in my personal capacity. The TRO supports the Historic Core Zone proposal.	Comment noted.
S3	Resident of Bainton Close, Bradford on Avon	I am fully in favour of the introduction of the restricted parking zone and fully support the introduction of the historic core zone.	Comment noted.
S4	Councillor Rosemary Brown Chairman, Bradford on Avon Air Quality Alliance	Traffic Regulation Order - Restricted Parking Zone - Bradford on Avon The Bradford on Avon Air Quality Alliance Steering Group met on Thursday 3 April to consider amongst other items the Traffic Regulation Order for the Restricted Parking Zone in Bradford on Avon, currently advertised for public comment.	Comment noted.

The members of the Steering Group represent the key stakeholder groups in the town, these being:

Bradford on Avon Area Board Bradford on Avon Town Council Bradford on Avon Preservation Trust Bradford on Avon Development Trust Climate Friendly Bradford on Avon Bradford on Avon Seniors Forum Bradford on Avon Community Area Network

The Steering Group has asked me to communicate to you its unanimous support for the Road Traffic Order and the implementation of the Historic Core Zone scheme in Bradford on Avon, subject to three important caveats:

- i) An updated Equalities Impact Assessment being carried out to assess the impact of the scheme on vulnerable groups.
- ii) The re-endorsement of the Historic Core Zone project by the Bradford on Avon Town Council at its meeting on 27 May 2014.
- iii) The re-endorsement of the Historic Core Zone project by the Bradford on Avon Area Board at its meeting on 14 May 2014.

RPZ Objection

	RESPONDEE	<u>COMMENTS</u>	OFFICER COMMENTS
01	Resident of Bradford on Avon	The proposal is to replace the existing arrangements with a Restricted Parking Zone throughout the area proposed for the Historic Core Zone. I am opposed to this as it will replace yellow lines with more signage - one type of "clutter" for another. The yellow lines are well known to motorists but replacing them with signage will make it much less obvious than now where parking is not permitted, leading to frustration and unnecessary infringement of regulations. It is difficult to see how this will preserve or improve the amenities of the area.	The introduction of an RPZ allows for the removal of the yellow lines that would be used conventionally to control areas where parking is not permitted. The overall number of signs used, whether using conventional methods or by RPZ rules result in approximately the same number of signs being used. It is accepted that there will be a period of time when the public will need to get used to the new restrictions but RPZ's have been used successfully in other parts of the country.
O2	Resident of Whitehill Bradford on Avon	 (RPZ COMMENTS) Thank you for inviting comments on the proposed changes to the street design which affect people within Bradford on Avon and those travelling through. This e-mail is my numbered comments on the proposed TRO's to modify the restrictions on street parking in the centre of Bradford on Avon. 1. I am surprised the proposals were only in the Notices on 14th March in the Wiltshire Times. Only one week when comments are invited from 14th March to 7th April. I recommend they should be in the Notices for three weeks at least, to fulfil the task of informing the public. Your Notice states the reasons for the proposed modifications: Reasons for the RTRA 1984 Section 1 (1) (f) For preserving or improving the amenities of the area through which the road runs. 	The advertisement of Traffic Regulation Orders follows the process set out in the Local Authorities' Traffic Orders(Procedure)(England and Wales) Regulations 1996.

2. Taking away the yellow lines and notices, and substituting new notices giving the same restrictions as before, does not improve the amenities through which the affected roads run. The single and double yellow lines and white lines are a code system understood nationwide and by foreign visitors. The new proposals are experimental, and likely to cause congestion through being misunderstood.

The proposed Bradford on Avon Historic Core Zone traffic management scheme seeks to reduce the dominance of motorised vehicles and improve the pedestrian environment, providing through movements for traffic and preserving the character of the town.

The creation of a restricted parking zone reduces road markings; the existing parking bay locations and type are unchanged.

3. The notices announcing the 'restricted parking zone' at the Inner gateways of the HCZ may not be easily read by the drivers of vehicles, who have other demands on their attention at the same time. It is too far to walk back up to the gateways to check the rules, once the driver is trying to park. The existing yellow lines tell the driver the rules in the location they are seeking to park: instantly available and clear. I disagree with the removal of the yellow line markers, I think the inner gateway notices are an inadequate substitute.

MAPS E121, EJ20, EJ21 and EK20

- 4. I live on Whitehill. I am surprised that the RPZ extends all the way up Coppice Lane, and Whiteheads Lane, and a small part of Whitehill. If there is confusion about parking in these streets, because of the loss of the double yellow lines, and people do start to park, there will be gridlock, because they are so narrow and steep. If this prevents emergency vehicles getting through the consequences may be catastrophic. It will be difficult for any traffic warden to enforce regulations shown on poles, rather than by clear kerb lines. I object to the proposed removal of yellow lines and their substitution with an RPZ.
- 5. On Church St it seems like quite an open area. If the parking regulations are not clear, the end near the McKeever Bridge will tempt drivers to park not knowing how many people live and work up the hills to the side. Access to the churches and those streets is preserved by the present parking delineation, and double yellow lines.
- 6. If this RPZ is such a good idea, why isn't Kingston Mills included? It lies absolutely in the Historic Core of the town.

IN SUMMARY

The proposed Restricted Parking Zone in Bradford on Avon, which has

The RPZ and the way it is signed and marked is not an experiment. RPZ's are a DfT approved way of controlling on-street waiting and loading and have been used in many areas of the country. It is accepted that there will be a period of time when the public will need to get used to the new restrictions but RPZ's have been used successfully in other parts of the country.

See substantive comment – Legibility of Zone entry signs.

Both Coppice Hill and Whiteheads Lane are cul-de-sacs accessed off Silver Street. It would be perverse to leave these out of the RPZ given that this would mean additional entry signs when leaving these roads to join Silver Street.

Within a RPZ parking is only permitted within the marked bays. It is accepted that there will be a period of time when the public will need to get used to the new restrictions but RPZ's have been used successfully in other parts of the country.

The Kingston Mills development lies within the zone, but has been designed and built in a manner that already achieves the majority of the outcomes anticipated by the HCZ. There is no need for additional work within the development.

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		been suggested under the Historic Core Zone proposals, will not achieve the stated aims. The changes in the RPZ will do more harm than good. Instead, the town would benefit from a park and ride scheme, and increased public transport. We also need improved maintenance of the highway and pavements. I am pleased to see this is happening already.	
O3	Resident of Palairet Close Bradford on Avon	(RPZ COMMENTS) I write in response to the above mentioned proposed restricted parking zone. I object to this proposal on the following grounds: 1. Double yellow lines are used all over Britain and motorists understand that they mean no parking at anytime, the majority heeding this restriction. To remove them and have signs instead would only serve to confuse motorists and could cause chaos or even be dangerous. How is it classed as decluttering if there are signs instead of lines? And what is wrong with yellow lines? They work. I fail to see any advantage. 2. It is not clear whether the total number of parking spaces will be reduced within the Restricted Parking Zone, but if there is any reduction in spaces, then I am against the order, as during peak hours it is usually difficult to park with the system we have now. Any reduction would be detrimental to residents, visitors and traders alike.	See all substantive comments. The overall number of on-street spaces will be reduced by 20 metres (approximately 4 cars) to accommodate the layout changes being made at the Church Street / Market Street junction. This reduction would be required whether the RPZ goes ahead or if the parking remains conventionally signed and marked.
04	Resident of Palairet Close. Bradford-on-Avon	(RPZ COMMENTS) I wish to object to the proposed restricted parking zone as referenced above for the following reasons. 1. The current on-street parking is both useful (especially to people with restricted mobility); causes very little interference with traffic flow and relieves pressure on Bradford's car parks which are frequently full.	On-street parking is retained within the RPZ.
O5	Resident of Newtown, Bradford on Avon	(RPZ COMMENTS) Finally I understand that if implemented the RPZ would require a significant number of parking allowed signs which appears to fly in the face of another objective, namely of de-cluttering the streets of the town.	See substantive comments – Number of signs.

Appendix 3

Historic Core Zone Support

	RESPONDEE	COMMENTS	OFFICER COMMENTS
S5	Andrew Claridge 33 Silver Street Bradford On Avon Wiltshire	This proposal is necessary to address the significant challenge of helping the visitors and residents to safely move around Bradford on Avon. Currently there is significance imbalance in favour of the high levels of vehicles that pass through the town each day. Pedestrians currently don't feel confident that they can interact with the town's facilities and services easily or safely. The townscape is in a poor state and desperately needs this investment. It will increase footfall into the town and give it the much needed boost to its economy.	Comment noted.
\$6	Andrew Eberlin 60 Newtown Bradford on Avon Wiltshire	I fully support this initiative. It will help revitalise our town centre by making it easier for pedestrians to get about which will in turn help local businesses in these difficult times. It will also improve the look of the town centre.	Comment noted.
S7	Tessa Edgecombe Appletree House, 13 Market Street, Bradford on Avon, Wiltshire	As a resident of Market St, BOA, I am very much in support of the Historic Core Zone and the above traffic order. Many signatories of a petition to keep the zebra crossing in Market Street would not necessarily have been given all the facts about the HCZ. It is much easier to get someone to sign a petition to support such a thing whereas it is a more complex argument to explain to people the advantages of the HCZ and its benefits. BOA will suffer if its centre is not regenerated and made modern and safer.	Comment noted.

\$8	Resident of Tory Bradford on Avon	I am writing to add my support to the development of the Historic Core Zone in Bradford on Avon. I think the plans for the zone are great, and will make a huge difference to the centre of our small town. It badly needs a new approach to managing the relationship between traffic and pedestrians, and the solutions put forward look great to me. I look forward to all approvals being granted and seeing this work start as soon as possible. The results will be worth the investment - a safer place for us to live.	Comment noted.
S9	Victoria Landell Mills 17 Winsley Road Bradford on Avon BA151QS	This scheme is to be welcomed. It is the first stage in a process of moving the balance between traffic and pedestrians in the centre of this busy town to give more priority to people on foot rather than when they are in vehicles. Given that the centre of BOA is on an A route, is at the junction of other well used routes, is the only road crossing place of the River Avon for many miles, is at the bottom of an escarpment and additionally has a mediaeval street pattern, any solution is going to be hard to find. This first stage in the HCZ scheme has had the benefit of close study by experienced traffic engineers, it builds on the experience of what has worked elsewhere, it has been subject to extensive consultation in the town over a period of years. It should be taken forward.	Comment noted.
S10	Resident of Meadowfield, Bradford on Avon	(HCZ COMMENTS) The Historic Core Zone proposal is supported by the following points: The Spatial Vision in Wiltshire's draft Core Strategy includes the following as an aspiration for 2026: "Market towns and service centres will have become more self-contained and supported by the necessary infrastructure, with a consequent reduction in the need to travel. In all settlements there will be an improvement in accessibility to local services, a greater feeling of security and the enhancement of a sense of community and place." The Historic Core Zone scheme will support this aspiration by rebalancing the town centre in favour of pedestrians, thus encouraging residents to walk to the centre to access local services rather than drive. Greater safety and an improved streetscene in the town centre will enhance the sense of community and place. Wiltshire's Local Transport Plan LTP3 has as its Strategic Objective 1: "To support and help improve the vitality, viability and resilience of Wiltshire's economy and market towns". The Historic Core Zone scheme will help to meet this objective by enhancing the attractiveness of the town centre, thus encouraging residents and visitors to use the shops and facilities rather than out-commuting. Secondly, the LTP3 has as its Strategic Objective 3: "To reduce the impact of traffic on people's quality of life and Wiltshire's built and natural environment". The Historic Core Zone scheme supports this objective. Thirdly, the LTP3 has as its Strategic Objective 7: "To enhance Wiltshire's public realm and streetscene". The Historic Core Zone scheme supports this objective. Wiltshire Council's ANPR	Comment noted.

		Survey of 2013 has shown that only 16% of the vehicle movements in Bradford on Avon are 'through' journeys. Of the remaining 82%, a proportion will be generated by residents who feel safer driving through town than walking. We, as residents, need to adopt more sustainable methods of transport so that we can be part of the solution. The Historic Core Zone scheme will provide a vital first step in improving the pedestrian environment, which will encourage residents to leave their car at home when visiting the town centre. However, the Historic Core Zone cannot solve traffic volumes and air quality issues on its own. It must be part of a complete package of measures which address freight movements, public transport provision, parking, lower carbon methods of transport, wayfinding, etc. This is a long and daunting list but it needs to be started somewhere, and the Air Quality Alliance is in place to begin this work. The Historic Core Zone project will provide the kickstart we need. Without it, the effect of traffic on the town centre will only get worse, forcing more residents into their cars and exacerbating the problem.	
S11	Resident of Bradford on Avon	I am writing to express my support for this forward-thinking scheme which I believe will bring enormous benefits to our town. I would particularly wish it to be noted that I have nearly been run over a number of times on the current zebra crossing, which is meant to be a safe place to cross but is not. The HCZ plan addresses the underlying issue of changing driver and pedestrian behaviour and cannot come too soon.	Comment noted.
S12	Co-ordinator of Lorry Watch Bradford on Avon	I am writing in support of the HCZ plan for Bradford on Avon. In my capacity as Lorry Watch co-ordinator, I have for the last 2.5yrs watched with dismay at the confusion and congestion in the centre of Bradford. Having lived here all my life, I've seen the centre of Bradford deteriorate, slowly but surely, due mostly to overload of cars and huge lorries breaking the law and crossing the bridge. My main concern is the congestion and pollution. I do believe as an 'on the fence' supporter that this will truly benefit the traders and the eventually the residents, although they don't all believe that, but that's mainly because it's counter intuitive idea that you don't need to be given hundreds of instructions, and don't need to use your brain, when either driving or crossing the road, is typical of the majority of people. However, I think the traders deserve a decent town centre to attract visitors, and if this investment isn't used to the good of BOA I think the town will simply die, and that would be a disaster for everyone. The hysteria revolving round 1 zebra crossing is utterly fuel inflamed, by groups that intend one way or other to scupper this plan. They have tunnel vision and cannot and will not listen to reasoning. Whether or not it will deter heavy lorries, I'm not sure, but of course, the way to stop them would be to introduce a chicane on the entrance roads, whilst installing the HCZ and this would physically stop 6 axle lorries coming through the town. All in all, go for this HCZ. We deserve and need it.	Comment noted.

S13	Retail trader, The Shambles, Bradford on Avon	I write to you regarding the planned Historic Core Zone in Bradford on Avon, I am a local resident and a retailer in the town. Bradford on Avon, like many other high streets, has struggled through the last few years with the town retailers feeling the effects of both the recession and our changing shopping habits. Bradford relies heavily on the local community and tourists to keep the town alive, it would seem this project will really help the town feel safer and will be easier for pedestrians to negotiate the streets, so encouraging people to use their town. As a retailer I have a lot of contact with the people who use this town and it would seem that there has been a lot of controversy in town over the planned changes to the crossing provision, namely the loss of the zebra crossing in Market St. Most people, myself included, have had a near miss of some sort when using that crossing because traffic accelerates up through the narrow section from knees corner and is on top of the crossing before the driver has a chance to see it. I believe that the new raised crossings will slow traffic sufficiently for drivers to see pedestrians earlier and as they are travelling at a slower speed they will be more inclined to stop. I am concerned that the petition you have received to retain the zebra crossing has not been gathered with all necessary transparency. I was asked to sign that petition and was told that we were simply losing the zebra crossing, no mention was made of the planned replacement crossings, when I asked about the crossings I was shown a digital impression of the planned changes on an ipad that showed the crossings as a flat road surface. Had I not been aware of the details of the planned scheme I would have been more than happy to sign the petition. I fear that many people who did sign this petition were only given this very inaccurate information. As a business in Bradford on Avon I am very much in favour of this scheme, I think the Historic Core Zone will make the town safe and more appealing to pe	Comment noted.
S14	Resident of Woolley Street Bradford on Avon	I strongly support this project and would like to request that when the first phases are completed and thoughts go to the extensions, that the stretch of Woolley Street going east from the bottom of Whitehill to where the one –way road begins (Frying Pan Hill) is included in the zone. My reasons are:	Comment noted.
		This stretch of road has a number of listed historic properties which	

should be protected from traffic fumes emitted by stationary vehicles. If the build up of traffic in this area was to increase from the present rush hour queues there would be a detrimental effect to some of the town's most historic properties.
 This stretch of road, I believe, is heavily polluted with diesel particles which are a major cause of lung disease and other health problems. In fact I would like to see the measured figures for the pollution in this area.
 It seems that the majority of objectors to this scheme are concentrating on safety at crossing points. In fact the number of pedestrian accidents in town is minute and there is no reason to believe that number will grow within the HCZ.
4. Pedestrians must accept a large degree of personal responsibility when using towns and watching out for vehicles but there is nothing any individual can do to avoid breathing in diesel particles and I think that greater emphasis should be placed on the environmental benefits of the HCZ- the chances of developing lung disease in a polluted area are very much greater than being run down and killed by a vehicle. It has also been documented that diesel particles are very bad for child health as well so if the HCZ is a success and extended all sections of our community will benefit.

Historic Core Zone Objections

	RESPONDEE	<u>COMMENTS</u>	
O6	Mrs S Freeman 44 Priory Close, Bradford on Avon, Wiltshire, BA15 1QZ	As a resident of Bradford on Avon I am strongly opposed to some aspects of the Historic Core Zone (HCZ) scheme which are being proposed for our town centre. I believe that pedestrian safety could be seriously compromised if the HCZ is implemented in its current form. I disagree with the proposed removal of the Zebra Crossings in Market Street and Silver Street in the centre of Bradford on Avon. If the HCZ goes ahead these will be replaced by several unregulated 'courtesy crossings' which will rely on the 'goodwill' (courtesy) of drivers to stop for pedestrians. I believe these crossings are confusing and therefore dangerous for pedestrians as priority is given to drivers because they are not obliged to stop.	See substantive comment - Removal of the zebra crossing, replacement with informal crossings and safety.
		There are negative implications for many people, including those who are visually impaired as they cannot rely on eye contact to check whether the drivers from both directions are willing to stop for them.	See substantive comment - Equalities impact.
		Why should pedestrians be forced to 'wait and see' if drivers will bother to stop for them? According to the Highway Code drivers must stop at a Zebra Crossing - this isn't the case with 'courtesy crossings'. I doubt that, on such a busy road, drivers will understand what these 'courtesy crossings' are. Traffic accidents can happen in a split second and an error of judgement or a misunderstanding on the driver's or pedestrian's part could easily result in an injury or fatality.	See substantive comment - Removal of the zebra crossing, replacement with informal crossings and safety.
		There has been much hype about a 'shared space' for pedestrians and drivers. Given the volume of traffic and narrowness of the streets in central BoA I certainly do not want to 'share' my space with the cars, vans and juggernauts which currently pass through our town centre. Proper kerbs and regulated crossings help keep pedestrians/vehicles safely separated. Drivers and pedestrians 'understand' Zebra Crossings - they have a clear function.	Comment noted.
		Supporters of the HCZ claim that this scheme is going to make the centre less tatty and therefore more attractive to customers. Surely the huge amount of vehicles currently clogging up the streets detract from any aesthetic improvements	See substantive comment - Impact of the scheme on traffic and

which could be made by removing current street furniture? Aesthetic considerations should never take precedence over pedestrian safety.

I am aware that similar schemes have been successfully implemented in other towns but I fail to see how this HCZ will work in this part of BoA given the high volume of traffic and the unique geography of the streets. I understand that experts have been working on this scheme for 6 years but they now need to listen to residents who actually use the current Zebra Crossings successfully on a daily basis.

Removal of the Zebra Crossings will directly affect myself and my family. We have young children and walk around the town a lot and use many of the amenities. We have taught our children to find a safe, controlled place to cross; ie. a Zebra, Pelican etc. One of our children has a hearing impairment and, when she starts venturing out on her own, I need to know that she can cross the road safely at clearly defined, regulated crossing points. If people don't feel safe crossing the roads I imagine they will stop using the shops/cafes which could have an adverse effect on local businesses. That would be a shame.

Supporters of the HCZ claim that this scheme will make the centre safer for pedestrians by providing more crossings - I strongly disagree that this is the case. It doesn't matter how many 'courtesy crossings' there are - if they're unregulated they're unsafe! I am not afraid of change and I would support any scheme which would enhance pedestrian safety. Indeed, I was fully supportive of the pedestrian bridge proposal a few years ago which would have linked Kingston Mills to the library. Even though this scheme had planning permission, it was blocked by a narrow majority as a result of a referendum. What a missed opportunity that was! Once again, pedestrian safety was compromised by this decision.

I understand that the proposed HCZ is likely to cost approx £2.5 million. I would suggest that the money could be better spent on improving Flood Defences as well as providing more controlled crossings in the town; especially outside Fitzmaurice and Christ Church Primary Schools. Perhaps parking could be improved in residential as well as commercial areas?

Nothing so far has convinced me that the HCZ is going to improve the centre of our town or encourage more people to shop here. I do not believe it will make the town a safer place for pedestrians - only the re-routing of the high volume of traffic would do that. Perhaps any 'spare' council money should be spent on trying to solve that problem instead? As for 'calming traffic' - well anyone who drives through the centre regularly would quickly realise that traffic already often travels at a snail's pace. I can imagine that the HCZ will mean that drivers will become even more frustrated when they travel through the centre and therefore I doubt they'll be willing to stop at the numerous 'courtesy crossings' if they don't have to.

Hopefully my views will be taken into account. I do not claim to be an expert but having lived in the town for many years. I walk and drive around it a lot and I do

congestion.

Comment noted.

See substantive comment - Equalities impact.

See substantive comment - Removal of the zebra crossing, replacement with informal crossings and safety.

Flood defence is the responsibility of the Environment Agency not Wiltshire Council. The funding for the HCZ cannot be used for flood defence.

See substantive comment - Impact of the scheme on traffic and congestion.

The Bradford on Avon HCZ is based on the same principles as the four HCZ schemes that were introduced in Halifax, Lincoln,

		feel that I have a good understanding of pedestrian safety and how the HCZ could have a negative impact on this. Before this public money is spent maybe the experts could consider making some sort of compromise? Perhaps the current Zebra Crossings could be kept whilst some of the less controversial aspects of the HCZ could still be implemented? Hopefully common sense will prevail - I hope so!	Shrewsbury and Bury St Edmunds in the early 1990s. The HCZ looks at how traffic management schemes can be designed to suit areas of special historic character. The emphasis of all of these schemes was that there should be shared streets and pedestrians should have priority which is achieved through slower vehicles speeds, increased footway space, reduced street clutter etc. The BoA scheme incorporates elements of all four schemes. However, Colin Buchanan designed a scheme that considered the specific characteristics of BoA, i.e. higher traffic flows and took into account the views of key stakeholders, who were crucial in the development of the scheme in the initial stages. The design principles for the BoA HCZ are set in out Section 8 of the Colin Buchanan report from 2010. It is however worth pointing out that one of the key design principles is about improving accessibility for those with mobility problems.
07	Resident of Bradford on Avon	(HCZ COMMENTS) Regarding the objective to reduce the dominance of motorised vehicles, this will	See substantive comment - Removal of the zebra crossing.
		not be achieved by the proposal to replace the zebra crossings with courtesy	replacement with informal crossings and safety.
		crossings, nor that to remove kerbs and introduce raised tables. The consultations held in 2012 and early 2013 showed the extent of the opposition to these	See substantive comment - Impact of the scheme on traffic and
		measures. This opposition has been ignored or played down. The Equality Impact Assessment which was produced following the consultation with disabled bodies	congestion.
		and individuals is open to objection and has not been reviewed as it should have been. The scheme in its present form will fail to reduce the dominance of	See substantive comment - Equalities impact.
		motorised vehicles resulting in a more dangerous environment for the visually impaired, other disabled, the elderly and the young. I therefore object to the scheme on these grounds.	The comments made in the earlier consultations showed some level of concern about the removal of the zebra crossing. This has since been addressed through amendments to the design, to include making the informal pedestrian crossings more prominent in the scheme.
		The introduction of multiple informal "courtesy crossings" will cause increased stop/starting of vehicles leading to increased air pollution in a town which already	
		has significant pollution. This is another reason for objecting to the scheme in its present form.	See substantive comment - Impact of the scheme on air quality.
		Similarly, the removal of the yellow hatched boxes at the top and bottom of Market Street is likely to lead to driver confusion and consequent traffic congestion.	The changes that the HCZ are intended to bring about will encourage drivers to take more care and drive in a courteous manner. In these circumstances it is not considered that the yellow box markings are required.
		The public opposition to the proposals has been made clear, including a petition of over 1100 signatures to save the zebra crossing. I am therefore opposed to the TRO's as a further step towards the introduction of a much less safe environment for the town.	Comment noted.
		There should be an objective reappraisal in the light of the many criticism's of the	The TRO consultation has provoked a wider response to the more

		scheme as presently defined before any such measures are introduced. Those who have criticised the scheme in its present form have been assured that these wider objections would be taken fully into account in arriving at a decision on these TRO'S. I trust that this will be the case. Hopefully a satisfactory improvement to the town environment would result from an objective reappraisal of the proposals.	general issues relating to the Historic Core Zone. These representations will be used to help and inform decision making in that regard .
O8	Resident of Bradford on Avon	I object to the removal of the zebra crossing. Courtesy crossings remove any legal right to cross the road. My previous comments at the original consultation have been ignored. It is not change that I object to if it for the better, I love it when there is no traffic in the town but where will it go.	See substantive comment - Removal of the zebra crossing, replacement with informal crossings and safety. The comments made in the earlier consultations showed some level of concern about the removal of the zebra crossing. This has since been addressed through amendments to the design, to include making the informal pedestrian crossings more prominent in the scheme.
О9	Resident of Woolley Street, Bradford on Avon	What is there not to like about BOA's HCZ as its being described by posters, articles in magazines & at meetings in the town. Sadly what is being described is not factually correct & not data driven. For Phase 1 in Market St: 1. Air Quality – Where are the readings? 2. How many vehicles pass through Market St every day? (19k at Knees Corner) 3. Accident statistics, where are they?	See substantive comment - Impact of the scheme on air quality. The DfT report 'Stage 1:Appraisal of Shared Space' indicates that in the 4 Historic Core Zones looked at by the study that there had been no significant change in casualty numbers following the HCZ's introduction.
		4. Origination & destination survey data should be used. How was the scheme modelled as Laura Gosling reports without this data? How will the scheme be evaluated after implementation without original data?	The Council has recently undertaken a traffic study examining patterns of vehicular movements within, and around, Bradford-on-Avon. As well as giving a clearer indication of the balance of local and longer distance movements through the town, it will establish the basis for any future monitoring.
		The public are being told: That the pavements are being widened & that it will be a much more pleasant space to walk around. The pavements are only being widened outside the Catholic Church & by the Swan Hotel. The pavement on the opposite side of the road going up towards Masons Lane will still be the same width. A resident wishing to walk from the top of Masons Lane area will still struggle with a pushchair let alone a dog plus toddler to get to the park as the pavement is too narrow. This is not improving the	Post implementation surveys and monitoring will be carried out to assess the impact of the scheme and feedback from users will also help to measure how well the scheme is working. It has not been possible to widen all footway areas given the existing layout and topography in the centre of Bradford on Avon. Footway widening has been achieved where it is practical to do so.

pedestrian experience within the main street of Bradford on Avon.

Less intimidation by traffic.

How? This plan will not reduce traffic, just slow it down & make motorists even more frustrated. Today the closure of Market St for a month has come into force. There are queues of traffic back to the Barge Inn. There is no other optional route for a lot of the traffic or do you want to send the traffic miles out of their way to Staverton. That is just moving the problem.

Motorists don't take any notice of Zebra Crossings.

Then why, on a busy A road, would you replace them with deregulated crossings. A Dept. of Transport report says that evidence shows that once the volume of vehicles reaches over 13700 per 24 hours then there will be an adverse effect on accidents, there are 19k per 24 hours at Knees Corner. The Zebras are being reintroduced in Bath, Portishead, Warwick & I believe consultation is ongoing in Ashford in Kent as 80% of the public want them back, particularly women & older people.

Poynton & Shrewsbury are the role models.

They both have ring roads & other routes for the motorist, Shrewsbury is mainly one way & you don't need to enter the zone unless you really want to. If you read Poynton's Forum on the web you will read about how they have trouble with people parking, vans unloading etc. on their now widened pavements & causing a problem for pedestrians because there are not obvious restrictions. We will not have a small problem if a couple of cars pull over, it will be gridlock. Our streets are so narrow, who will police this? The designated parking signs that are being put up make a nonsense of the decluttering principle, there at least 25 of them.

You are not professional road designers, leave it to the experts.

Trouble is the working group & people obsessed with this scheme don't listen to the experts. Jaime Adkins at the last working group said in his opinion that he thought the yellow boxes would have to be reinstated. I suggested he got that minuted to protect his future reputation. Another Adkins guy Kevin when asked by me if he thought this scheme would work said only if it's within a one way scheme.' Have you suggested that 'I naively asked, he hasn't been to another working group meeting since.

The request for these TRO's is flawed. There is no final phase 1 scheme for the public to look at. We keep being promised up to date plans with bollards so that we can see what we are being asked to comment on. The parking spaces in Market St have been omitted, how is the public to know that.

I could go on about residents being ignored, the disabled & building housing schemes where children can't walk to school safely.

I come from a manufacturing background with 'do it right first time' is always the priority. This scheme needs to be right for BOA whatever it's called & not implemented by dogma & fashionable doctrine.

See substantive comment - Impact of the scheme on traffic and congestion

See substantive comment - Removal of the zebra crossing, replacement with informal crossings and safety

Where parking is allowed within the RPZ the locations will continue to be shown with road markings and be positively signed. With the exception of the zone entry signs the number of signs required for a RPZ is comparable with the number of signs used for the conventional signing of parking and waiting restrictions. The benefit of a RPZ is the ability to remove all yellow lines from within the zone. In deciding to include a RPZ as part of the overall HCZ the Working Group took the view that the removal of all yellow lines was of benefit and helps with de-cluttering.

The changes that the HCZ are intended to bring about will encourage drivers to take more care and drive in a courteous manner. In these circumstances it is not considered that the yellow box markings are required.

The overall number of on street spaces will be reduced by 20metres (approximately 4 cars) to accommodate the layout changes being made at the Church Street / Market Street junction. This reduction would be required whether the RPZ goes ahead or if the parking remains conventionally signed and marked.

Boundary signs notifying both the HCZ and RPZ are to be provided.

		What we need is compromise to move this scheme forward; there is no doubt that BOA needs a makeover, but 15 courtesy crossings, where's the lighting to illuminate them properly. Where are the signs to inform the motorist that they are entering a different type of area? Who owns this project? Whose responsibility is it? Where will the buck stop if there is a problem? At least 1/3 rd of the BOA Town Councillors want the Zebra Crossings kept within the scheme. I & others are being told that if we don't agree to the scheme as it is, the money will go elsewhere. That's bullying in my book & I'm sure covered by how Councillors should be treated in one of the guides I've read from WCC. I was elected to represent residents in the North Ward with honesty, integrity & not self-interest. Whatever you proceed with will affect all the roads within Bradford which are already under huge pressure please don't make it any worse.	Wiltshire Council, as the Highway Authority, will ultimately be responsible for the scheme once it is implemented. This means that 2/3rds of Councillors support the removal of the zebra crossing and that view is therefore in the majority.
O10	Resident of Newtown, Bradford on Avon	I submit the following response to the RPZ TRO for Bradford. 1. The reason and purpose of this TRO are stated to be the proposed Historic Core Zone. But the Restricted Parking Zone street plans do not match the HCZ plans; therefore the appropriateness of the former would be better served by assessment of the latter. We are told that this consultation can cover aspects of the HCZ which are not directly related to parking. 2. The traffic and pedestrian management measures in the HCZ scheme have not been justified by any relevant evidence on how the aims and claims are likely to be achieved. It is therefore a misleading prospectus, and a gamble with town centre safety and environment. This flouts the Precautionary Principle for works affecting the public.	 The aims of the HCZ scheme overall are: The creation of a clearly identifiable zone within the town that seeks to re-balance the relationship between motorised vehicles and vulnerable road users and reduces the dominance and intimidation of traffic. The development of a scheme which ensures that the character and appearance of the town is enhanced and preserved. The development of a scheme that improves accessibility for public transport users, pedestrians, cyclists and disabled people in the HCZ. The development of a scheme that will help pedestrians, cyclists and disabled people feel safer using the streets within the HCZ. The development of a scheme which improves the pedestrian environment whilst still providing through movements for traffic and sufficient levels of parking. The development of a scheme that ensures that traffic speeds and flows are in balance with the proximity of people within the HCZ.

3. The HCZ fails to show how its original 'Taming the Traffic' targets, namely 'traffic congestion' and 'pedestrian intimidation', would not be adversely affected. Since no reduction in traffic volume is predicted, the effect of more frequent interruptions to traffic flow by increasing the number of crossings in Market Street from one to four, and eventually in the total HCZ from 3 to 15, would inevitably be worse congestion, and more pollution in the Air Quality Management Area.

- 4. A stated aim of the HCZ is to 'rebalance the relationship between drivers and pedestrians'. However, the proposed measures promise a lose-lose outcome: on one hand drivers irritated by stop-starts at more crossings; on the other hand pedestrians disadvantaged by losing right-of-way on the Zebra in Market Street, and having to confront drivers from both directions before venturing on to a Courtesy Crossing. A particularly unwise example is the informal crossing between The Shambles and The Swan Hotel, a hotspot of driver/pedestrian conflict and hazard.
- 5. With this deliberate introduction of uncertainty and risk, exposed pedestrians are clearly more inhibited/intimidated than enclosed drivers. Apparently, drivers are to be cautioned by entrance 'Gates', but no warnings are proposed for pedestrians at informal crossings. The 'rebalancing' is discriminatory against pedestrians, especially the more vulnerable elderly, infirm and young children. Therefore the scheme defies the Equality Act 2010, and the guidelines of the Equality & Human Rights Commission as quoted on Wiltshire Council website. (This contention was submitted to Wiltshire Council's Associate Director, Legal and Governance, on March 23, and his answer is awaited).
- 6. The raised table at the Market/Church Street junction is unnecessary, and likely to achieve nothing to offset the loss of guidance and protection which kerb upstands provide for pedestrians

The scheme that has been designed seeks to achieve these aims.

The HCZ concept evolved from the Taming the Traffic workshops and the subsequent Priority for People events.

See substantive comment - Impact of the scheme on traffic and congestion.

See substantive comment - Impact of the scheme on air quality.

See substantive comment - Removal of the zebra crossing, replacement with informal crossings and safety.

See substantive comment - Impact of the scheme on traffic and congestion.

See substantive comment - Removal of the zebra crossing, replacement with informal crossings and safety.

See substantive comment - Equalities impact.

The Bradford on Avon HCZ is based on the same principles as the four HCZ schemes that were introduced in Halifax, Lincoln, Shrewsbury and Bury St Edmunds in the early 1990s. The HCZ looks at how traffic management schemes can be designed to suit areas of special historic character. The emphasis of all of these schemes was that there should be shared streets and pedestrians should have priority which is achieved through slower vehicles speeds, increased footway space, reduced street clutter etc. The BoA scheme incorporates elements of all four schemes. However, Colin Buchanan designed a scheme that considered the specific characteristics of BoA i.e. higher traffic flows and took into account the views of key stakeholders, who were crucial in the development of the scheme in the initial stages. The design principles for the BoA HCZ are set in out Section 8 of the Colin Buchanan report from 2010. It is however worth pointing out that one of the key design

	 The removal of the yellow boxes almost guarantees traffic jams, or vehicles mounting the pavement. Although sometimes misunderstood or abused by drivers, the boxes generally provide breaks in traffic queues, allowing wide opposing vehicles to pass through the narrows. Popular support for the HCZ scheme has not been demonstrated. On the contrary, in 'final' public consultations in January 2013 of the Phase 1 plans, 71% of 557 written responses were negative, with deregulation of the Zebra crossing as the most mentioned concern. However, little if any notice appears to have been taken. There are lessons to be learnt from the research by the University of the West of England which found 80% of pedestrians felt less comfortable after implementation of the 'shared space' scheme in Ashford, Kent; and from the reinstatement of formal crossings in Bath and Warwick; as well as from the recent fatality on an informal crossing in Swindon. Please include in the responses to this RPZ TRO consultation the 'Save Our Zebra' petition submitted to Mr David Parkes of Democratic Services on February 27. This had 1,172 signatures with addresses and postcodes (24 more surfaced later), mostly on sheets in shops, cafés etc, and therefore unprompted. Of the people invited to sign, few understood the details of the HCZ scheme. Only about 5% refused to sign, which, on this substantial sample, indicates that roughly 95% of the public would favour retaining the regulated crossing. The HCZ scheme lacks credibility; it owes more to aspiration, theory and novelty than research, relevant evidence, and objective assessment of the context. Bradford's combination of gradients, limited street space, high flows of two-way traffic, no alternative vehicle route, and high proportion of elderly residents amounts to an unsuitable case for deregulation and desegregation. (Commentators have remarked on how Mondemann's original 'shared space' principles and caveats have been stretched and misapplied i	principles is about improving accessibility for those with mobility problems. The changes that the HCZ are intended to bring about will encourage drivers to take more care and drive in a courteous manner. In these circumstances it is not considered that the yellow box markings are required. See substantive comment - Impact of the scheme on traffic and congestion. The comment that the HCZ working Group took no notice of the 71% negative comments is incorrect. This has since been addressed through amendments to the design, to include making the informal pedestrian crossings more prominent in the scheme. Reference to the petition is made elsewhere in this report.
Resident of Newtown, Bradford on Avon	(HCZ COMMENTS) I understand that the sole purpose of this TRO is that the RPZ is required for the Historic Core Zone project. At the recent by-election for the Bradford on Avon Town Council, at which I was elected, many of the residents that I met expressed concern about the HCZ proposals. These concerns fall into two categories:	
		vehicles mounting the pavement. Although sometimes misunderstood or abused by drivers, the boxes generally provide breaks in traffic queues, allowing wide opposing vehicles to pass through the narrows. 8. Popular support for the HCZ scheme has not been demonstrated. On the contrary, in 'final' public consultations in January 2013 of the Phase 1 plans, 71% of 557 written responses were negative, with deregulation of the Zebra crossing as the most mentioned concern. However, little if any notice appears to have been taken. There are lessons to be learnt from the research by the University of the West of England which found 80% of pedestrians felt less comfortable after implementation of the 'shared space' scheme in Ashford, Kent; and from the reinstatement of formal crossings in Bath and Warwick; as well as from the recent fatality on an informal crossing in Swindon. 9. Please include in the responses to this RPZ TRO consultation the 'Save Our Zebra' petition submitted to Mr David Parkes of Democratic Services on February 27. This had 1,172 signatures with addresses and postcodes (24 more surfaced later), mostly on sheets in shops, cafes etc, and therefore unprompted. Of the people invited to sign, few understood the details of the HCZ scheme. Only about 5% refused to sign, which, on this substantial sample, indicates that roughly 95% of the public would favour retaining the regulated crossing. 10. The HCZ scheme lacks credibility; it owes more to aspiration, theory and novelty than research, relevant evidence, and objective assessment of the context. Bradford's combination of gradients, limited street space, high flows of two-way traffic, no alternative vehicle route, and high proportion of elderly residents amounts to an unsuitable case for deregulation and desegregation. (Commentators have remarked on how Mondemann's original 'shared space' principles and caveats have been stretched and misapplied in the UK). These traffic management proposals seem counter-productive and detrimental to the Historic Core Zo

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The scheme itself thus: a. Will the stated objectives actually be achieved?	The aims of the HCZ scheme overall are:
	The creation of a clearly identifiable zone within the town that seeks to re-balance the relationship between motorised vehicles and vulnerable road users and reduces the dominance and intimidation of traffic.
	The development of a scheme which ensures that the character and appearance of the town is enhanced and preserved.
	 The development of a scheme that improves accessibility for public transport users, pedestrians, cyclists and disabled people in the HCZ.
	The development of a scheme that will help pedestrians, cyclists and disabled people feel safer using the streets within the HCZ.
	 The development of a scheme which improves the pedestrian environment whilst still providing through movements for traffic and sufficient levels of parking.
	The development of a scheme that ensures that traffic speeds and flows are in balance with the proximity of people within the HCZ.
	The scheme that has been designed seeks to achieve these aims.
b. Will there be unintended adverse consequences?	Post implementation surveys and monitoring will be carried out to assess the impact of the scheme and feedback from users will also help to measure how well the scheme is working.
Specific details of the scheme, for example the proposed loss of the statutory zebra crossings.	
The stated objectives of the HCZ in the Wiltshire Council Infrastructure Delivery Plan 2 Appendix 1: Bradford on Avon Community Area, September 2013 are: "Reduce congestion and improve air quality" I see no evidence that these objectives would be met if the HCZ scheme were to be implemented. On the contrary, the Buchanan Report on which the scheme is based, specifically states that: 11.2.7 The proposals are not expected to create an unacceptable impact on the capacity of the road network, as the scheme can accommodate the current levels of traffic demand. It is expected, however, that the reduced carriageway widths, changes in surface treatments, additional pedestrian crossing points and particularly the sections of priority working on Silver Street will result in additional delays to vehicular traffic. As the HCZ principles are aimed at shifting priority from vehicles to pedestrians, some additional delay is to be expected. This will act to	

calm traffic and make it less desirable to drive through the town, especially during peak hours, which is thus expected to result in a reduction in total traffic demand and may indeed act as a driver for further environmental enhancement at a later stage.

Not expected to create an unacceptable impact on the capacity of the road network clearly means that there will be an adverse impact, the only question unanswered is the extent of this and to whom it will be not unacceptable. Similarly, that additional delays will occur is admitted but not quantified. Given that there is already congestion, severe at busy times with long queues, then any adverse impact on capacity can only worsen congestion. I believe that it is generally accepted that with congestion and delays comes deterioration in air quality. No air quality impact assessment of the proposed scheme has been carried out. I understand that Wiltshire Council's position is that there must be no reduction in road capacity with the scheme.

I submit therefore that both of these stated objectives look highly problematic. Another objective of the scheme put forward elsewhere is changing the balance in favour of pedestrians. In this I suggest that the safety of pedestrians must be paramount and the petition signed by more than 1100 concerned residents is evidence of serious concerns that the proposed "courtesy crossings" will be less safe. Furthermore in research commissioned by the Department for Transport into such shared space schemes MVAConsultancy reported data from the Netherlands thus:

"One of the conclusions is that the new approach can be applied for traffic volumes of up to 6600 motor vehicles per 24 hours without causing a noticeable difference in the number of accidents. Objective statistics show that there is no difference in road safety between the new planning approach and a traditional road layout. The study has shown, however, that applying the new approach to volumes of 13,700[0] vehicles per 24 hours will have an adverse effect on the number of accidents. There is a grey area for traffic volumes of between 6600 and 13,700 vehicles per day."46

The latest figures for the traffic flow over the Town Bridge are, I believe, around 19,000 vehicles per 24 hours, substantially above the 13,700 upper limit in the research. The implication of this is that the HCZ scheme would be less safe. Particular concerns have been expressed to me with the proposed crossings and layout for the young, the elderly and the blind. This is supported from real-life experience in Julian Road, Bath and High Street, Warwick where formal statutory crossings either have been or are to be reinstated. This is backed up by the views of Guide Dogs for the Blind and RNIB on their web-sites.

The proponents of the HCZ scheme cite comparisons with the likes of the scheme in Shrewsbury as a justification that it will work in Bradford on Avon, but this conveniently ignores the difference in road layout between the two towns. Shrewsbury has fast by-pass routes for through traffic and an inner "ring road"

See substantive comment - Impact of the scheme on traffic and congestion

See substantive comment - Impact of the scheme on air quality

See substantive comment - Removal of the zebra crossing, replacement with informal crossings and safety

Comment noted

Comment noted

The Bradford on Avon HCZ is based on the same principles as the four HCZ schemes that were introduced in Halifax, Lincoln, Shrewsbury and Bury St Edmunds in the early 1990s. The HCZ looks at how traffic management schemes can be designed to suit

which means there is little or no through traffic in the HCZ. Bradford on Avon has the A363 through the centre of the HCZ proposal.

For all of these reasons I believe that the TRO should not proceed to implementation and that the HCZ proposal be subjected to critical and objective review. As currently proposed it appears to have serious and unacceptable shortcomings.

For the avoidance of doubt I write in my capacity as a resident and an individual councillor and not on behalf of the Town Council.

Further Questions asked directly of the Cabinet Member for Highways

Q1 Who owns the Historic Core Zone project?

Q2 Will it deliver what is promised?

Q3 Will there be unacceptable unintended consequences?

areas of special historic character. The emphasis of all of these schemes was that there should be shared streets and pedestrians should have priority which is achieved through slower vehicles speeds, increased footway space, reduced street clutter etc. The BoA scheme incorporates elements of all four schemes. However, Colin Buchanan designed a scheme that considered the specific characteristics of BoA i.e. higher traffic flows and took into account the views of key stakeholders, who were crucial in the development of the scheme in the initial stages. The design principles for the BoA HCZ are set in out Section 8 of the Colin Buchanan report from 2010. It is however worth pointing out that one of the key design principles is about improving accessibility for those with mobility problems.

Wiltshire Council as the Highway Authority will ultimately be responsible for the scheme once it is implemented.

The aims of the HCZ scheme overall are:

- The creation of a clearly identifiable zone within the town that seeks to re-balance the relationship between motorised vehicles and vulnerable road users and reduces the dominance and intimidation of traffic.
- The development of a scheme which ensures that the character and appearance of the town is enhanced and preserved.
- The development of a scheme that improves accessibility for public transport users, pedestrians, cyclists and disabled people in the HCZ.
- The development of a scheme that will help pedestrians, cyclists and disabled people feel safer using the streets within the HCZ.
- The development of a scheme which improves the pedestrian environment whilst still providing through movements for traffic and sufficient levels of parking.
- The development of a scheme that ensures that traffic speeds and flows are in balance with the proximity of people within the HCZ.

The scheme that has been designed seeks to achieve these aims.

Post implementation surveys and monitoring will be carried out to assess the impact of the scheme and feedback from users will also help to measure how well the scheme is working.

The consultation events held so far have indicated support for the

		Q4 Is it what the majority of residents want? Q5 Will it be a safer place to cross the road, particularly for the young, the elderly and the disabled? Q6 Will traffic congestion be made worse? Q7 Will it lead to a worsening of air quality? Q8 Are the additional journey times already forecast in the Buchanan report? Q9 What is the economic cost of delays?	HCZ Both the Town Council and Area Board have endorsed the proposals at various meetings since 2010, and since they represent the local community, this also shows there is public support for the scheme. See substantive comment - Removal of the zebra crossing, replacement with informal crossings and safety. See substantive comment - Impact of the scheme on traffic and congestion. See substantive comment - Impact of the scheme on air quality. See substantive comment - Impact of the scheme on traffic and congestion. Any additional delay cost to motorists is expected to be balanced by the economic growth within the town centre brought about by the HCZ.
O12	Resident of Whitehill Bradford on Avon	 (HCZ COMMENTS) Traffic calming features utilising coloured surfaces, natural stone and ramps are to be incorporated throughout the Historic Core Zone in a phased programme of works. 7. The design features of the Historic Core Zone are the subject of considerable dispute within the town. A petition to 'Keep the zebra crossing in the Historic Core Zone' on Market St has raised over 1,000 signatures in less than a month.(It was submitted to Highways in February). Speeding is not an issue (there is too much congestion) but the proposed ramps make it more difficult for parents to ensure their children stay on the pavement as well as making navigation harder for the visually impaired. There are virtually no accidents with the highway design at present. Modifications such as changing the surface colour will not indicate what the parking regulations are, so they are cosmetic and a waste of money. Natural stone structures for the Inner Gateways have already been dismissed, by the Town Council Historic Core Zone Working Group, as too expensive. [What does this have to do with Parking Regulations? These 'reasons' look like a cut-and-paste exercise for your notice, rather than an effort to involve the public] 	See substantive comment - Removal of the zebra crossing, replacement with informal crossings and safety.

		YELLOW BOX JUNCTION	
		 8. I understand from an e-mail dialogue with your colleague, Dave Thomas, the Highways engineer involved in the HCZ scheme, that in the proposed RPZ the yellow box junction at the bottom of Silver St will be removed. This will not 'reduce the dominance of vehicles'. Instead there will be no way for the uphill and downhill lanes to periodically give way to each other (which the box junction achieves) and the traffic will back up, causing frustration and conflict. Such frustration and conflict are not, at present, part of 'the character of the town'. PEDESTRIAN CROSSINGS 9. I understand, also from Dave Thomas, that the zebra crossing on Market St is to be replaced by several customary crossings. This signage is much less easily understood by motorists and pedestrians. The loss of the zebra crossing will severely affect the confidence of vulnerable pedestrians. This is in contravention of Equality legislation. It is likely that there will be a renewed Equality Impact Assessment for this aspect soon. My comment is that I think the zebra crossings on Market St and Silver St should be retained, and the proposed courtesy crossings outside the Swan and further up Market St by Orton's jewellery shop should not be installed. The courtesy crossings should not be striped – they are not a zebra crossing. None of the other courtesy crossings in Bradford on Avon have stripes. 	The changes that the HCZ are intended to bring about will encourage drivers to take more care and drive in a courteous manner. In these circumstances it is not considered that the yellow box markings are required. See substantive comment - Removal of the zebra crossing, replacement with informal crossings and safety. See substantive comment - Equalities impact.
O13	Resident of Palairet Close Bradford on Avon	(HCZ COMMENTS) Regarding the Historic Core Zone in general I would like to make the following points. a] To remove the zebra crossing and replace it with five courtesy crossing would be a big mistake and possibly dangerous especially for elderly, disabled and visually impaired pedestrians who cannot make eye contact with drivers. Many residents are very concerned about this and almost 1200 signed a petition to retain the zebra crossing within the HCZ. b] Removing kerbs is another concern for many reasons e.g.1. Children are taught to stop at the edge of the pavement- they could easily run into the roadway with no dropped kerbs. 2. During icy weather kerbs prevent traffic from mounting the pavement. 3. When flooding occurs the kerbs can prevent water from flowing into shops and houses.	See substantive comment - Removal of the zebra crossing, replacement with informal crossings and safety
		c] Removing yellow hazard boxes in the narrow areas of Market St. is a recipe for	The changes that the HCZ are intended to bring about will

		chaos and confusion and surely will cause road blockages. d] The scheme will slow the traffic causing more congestion and increased air pollution. B.O.A. already exceeds the European limits on air quality. Surely air quality needs to be addressed before an HCZ is introduced. Finally most these points were made by me and , I know, many other people during the consultation process. Please, is somebody going to listen this time?	encourage drivers to take more care and drive in a courteous manner. In these circumstances it is not considered that the yellow box markings are required. See substantive comment - Impact of the scheme on air quality
O14	Resident of Palairet Close. Bradford-on-Avon.	(HCZ COMMENTS) 2.I understand that the above proposal is the initial step in the introduction of the Historic Core Zone initiative. The advocates of this scheme freely admit that it will potentially A.slow traffic down.B.increase journey times and C.divert some motorists into using a longer route. All three situations will cause more fuel consumption and therefore more pollution. Since Bradford consistently breaks the European regulations on air pollution it seems reckless and inconsiderate to its inhabitants to proceed with this venture.	See substantive comment - Impact of the scheme on traffic and congestion See substantive comment - Impact of the scheme on air quality
O15	Resident of Rickfield Bradford on Avon	I am writing to object in the strongest possible terms to the proposed Historic Core Zone in Bradford on Avon. I have already expressed my concerns at the consultation exercise held last year, but the issues I raised, along with many concerns from other members of the public appear to have been dismissed. What is the point of a consultation if people's concerns are ignored? I have had confirmation from The Department for Transport that the planned "informal crossings" are completely unregulated. Pedestrians have no right to cross on them and drivers are not obliged to stop even when someone has already left the kerb. People will then be entirely dependent on drivers' discretion. If a pedestrian were to be knocked down on a foggy November evening the driver involved will probably argue that he was not obliged to stop and that, compared with a zebra, the crossing was not clearly visible - both indisputable. This will do nothing to help any possible prosecution. We have been told that these crossings are as safe as existing arrangements. Those responsible for HCZ should justify this assertion- do they have robust statistical evidence to support this? Even if the planned arrangements are just as safe statistically, I think it is important that elderly and vulnerable people also feel safe and have the confidence to cross the road independently, but HCZ does not meet this need. HCZ organisers admit that delays to vehicles will increase-this is almost certain to	See substantive comment - Removal of the zebra crossing, replacement with informal crossings and safety. See substantive comment - Removal of the zebra crossing, replacement with informal crossings and safety.

		result in greater carbon dioxide emissions, not to mention wasted fuel. If some drivers take a longer route to avoid HCZ this will again increase emissions. It is ironic that this increase will take place just as scientists are beginning to agree that we are seeing the first serious effects of Climate Change, as flood victims know to their cost.	See substantive comment - Impact of the scheme on air quality.
		The latest report from The Intergovernmental Panel on Climate Change (IPCC), which has just been published, spells out the imminent effects of climate change. The IPCC found evidence of climate change "on all continents and across the oceans". On global food security it said "All aspects of food security are potentially affected by climate change".	
		We should be increasing our efforts to reduce greenhouse gases, not introducing schemes that are likely to increase them. Finally, can we really justify an expenditure of £2.5M at a time of unprecedented cuts to public services?	
		 In summary, I believe that The HCZ must not go ahead because: The public have not been given hard evidence of its safety It does not meet the needs of elderly and disabled people It is incompatible with Wiltshire's obligation to reduce greenhouse gas emissions. It does not have sufficient public support The cost cannot be justified because of the above disadvantages and the current financial situation. 	Comments noted.
O16	Martin Valatin	The Council is to be congratulated for recognising Bradford on Avon has problems with motor traffic and its attempts to address this with an Historic core Zone	
		Three questions arise:	
		What is the Council's Air Quality data for Nitrogen Dioxide and Particulate Matter (10 and 2.5) when the scheme is implemented compared to present levels?	See substantive comment - Impact of the scheme on air quality.
		2. What are the modelled traffic flows before and after implementation and how will this affect journey times for through traffic (including the particular case of Heavy goods vehicles)?	See substantive comment - Impact of the scheme on traffic and congestion.
		 The proposed removal of Zebra crossings has become contentious (and removal of kerbs where pedestrians face oncoming downhill traffic also gives rise to concern). 	See substantive comment - Removal of the zebra crossing, replacement with informal crossings and safety.
		a). What direct comparisons are there for Shared Space schemes where an A road carrying C20000 vehicles per day passes through a town with steep gradients? Please can you name these schemes (in what towns)? How were	Comparative research and Department for Transport advice in that regard is set out in Local Transport Note 1/11. The context and detail to address this question is answered therein and can be found at

crossing times for pedestrians affected including after dark? Were there any accidents?

https://www.gov.uk/government/publications/shared-space.

b). Courtesy crossings have proved unsuccessful in a number of locations and Zebra crossings have had to be reinstated (including I am told, at Bath Warwick and Oxford). What would be the financial implications be if this were necessary in Bradford on Avon?

Zebra crossings typically cost c£15k.

c). Bradford on Avon has the highest proportion of retired residents in Wiltshire (around 40%). Incorporation of the existing zebra crossings would do much to boost confidence in the scheme, and in my view might make the difference between success and failure. Council officers advise that 'you could do it, no problem' but 'design would have to be revisited'. My background is in design rather than highway engineering, but it seems to me that the alteration would be minor – refurbishing the existing beacons a short distance uphill, using black and white stone in broad stripes for the crossing and white painted or inlaid tarmac as desired.

See substantive comment - Removal of the zebra crossing, replacement with informal crossings and safety.

Petition in support of the Historic Core Zone



Traffic Order Team Sustainable Transport Group Highways & Transport County Hall Bythesea Road County Hall Trowbridge Wiltshire BA14 8JN Chamber of Commerce 2, St Margaret's Place, Bradford on Avon, BA 15 1DT

4th April 2014

Dear Sir/Madam

Re: HKB/TRO/BRAD(rpz) Restricted Parking Zone, Various Roads, Bradford on Avon

We have gathered signatures from visitors, residents and businesses within the town in support of the Historic Core Zone development proposed for Bradford on Avon.

The petition has been drawn up in recognition that the Historic Core Zone, as a complete entity, will assist in delivering on points noted below needed for Bradford on Avon to continue to thrive and deliver on visitor and residents expectations.

In the 2012 Bradford on Avon Benchmarking Study by Action for Market Towns, 33% of respondents cited 'Safety' as a negative aspect of the town. The Historic Core Zone scheme will address this by improving the pedestrian environment.

- Introducing traffic calming features by utilising coloured surfaces, natural stone and ramps throughout the Historic Core Zone.
- Provide greater safety and an improved street scene in the town centre enhancing the sense of community and place.

Bradford on Avon has been identified in the Joint Strategic Assessment having the lowest footfall both in the South West and nationally even on busy days. The footfall has been falling annually. The Historic Core Zone scheme will help to drive footfall

- Enhancing the attractiveness of the town centre and encouraging residents and visitors to use the shops and facilities rather than out-commuting.
- Retailers feel that the development will therefore support and help improve the vitality, viability and resilience of the local economy.
- The Historic Core Zone scheme will rebalance the town centre in favour of pedestrians, encouraging residents to walk to the centre to access local services rather than drive.

There are other improvements needed in Bradford on Avon and we recognize that the Historic Core Zone project is not stand-alone. There are other projects in progress addressing other key issues such as air quality and pollution. This will be a step in the right direction and allow the town's economy to recover to ensure this historical working town continues to live to that remit.

Yours sincerely

Caroline Philpott President

Encs

Georgina Knight Executive Member

earque height

SAVE OUR ZEBRA!

PETITION TO WILTSHIRE COUNCIL HIGHWAY AUTHORITY

requesting that the regulated Zebra crossing in Market Street, Bradford on Avon, be retained in the Historic Core Zone scheme.

SHEET NUMBERS	. <u>SIGNATURES</u>		
1			26
2-34	Ye	33 x 25	825
35-38		4 x 24	96
39, 40	1, 2	2 x 23	46
41, 42		2 x 22	44
43			20
44			16
45, 46	. 80	2 x 15	.30
47			12
48			11
49, 50		2 x 9	18
51	*		6
52, 53	9, "	2 x 5	10
54			4
55			3
56, 57		2 x 2	4
58		,	_1_
		TOTAL	, 1,172

Checks found one duplicate signature on Sheet 43, and one signature uncounted on Sheet 6, both frrom BA15, so totals are unaffected.

All signatures were obtained in Bradford between January 23 and February 24, 2014, by personal approach, or unprompted on sheets available in shops, cafés etc. Among the signatories are 6 visually-impaired persons, and most of the nearby shopkeepers.

<u>ADDRESSES</u>	Postal co	de analys	<u>is</u>
	BA15	1,015	
	BA14	55	
	BA2	22	
	BA other	_16	
	BA total		1,108
	SN		26
	BS		18
	Other		20
*.			1.172

Petition received on behalf of Wiltshire Council by:

Officer:			
Position:	***************************************		
Date:		*	

SAVE OUR ZEBRA!

PETITION TO WILTSHIRE COUNCIL HIGHWAY AUTHORITY

WE THE UNDERSIGNED REQUEST THAT THE REGULATED ZEBRA CROSSING IN MARKET STREET, BRADFORD ON AVON, BE RETAINED IN THE HISTORIC CORE ZONE SCHEME

Signature	Name in capitals	Address	Postcode	
154 Tasla	MSCMASLEN	186 Toorsbridge Ra	BAIS IEX	
Ellen Gortan	EILEEN GORDON	32A Ashley Close	BAIS IRY	
ARPik.	JON PIKE	101, Woolly Sto	BAISIAL	
Garar musty	SARAN MURPHY	73 whitehu	BAIS ISC.	
Vyina But	VIRGINIA BROOKET	12, Spaces Ordand	BAISITJ	
David Maynord	DAVID MAYNARD	68 wontehry Bost	BAISISG	
A. Ibusan	ANNALIE IBLOON	The Ludge BOA	BAIS 2RA	
1, Adam	LESIEY ADAM	I PYE CORNER ATWORTH	SNIZ 8HA	SNO
X Ada	HARRY ADAM	1 PYE COLWER ATWORT	VSN12 8HA	
Helenstibaney	HELEN ARRANGY	FRESHERD	BAZTWO	
d.Days	JENNY DAVIS	yoxall	DE 138PF	DE
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Sally The.	S SABIRALI+A WASMUHT	99 HUNTONE HILL	8A2614	
Myl	to WASMUTT	/1	11	
V. Adary	TAKOLUSTTA ADAMS	10 Holland Store	BA15 13B	
1. Fanaly	VANE PATUAHY	Duckmend House.	BAISEPU	
Mary Hente	MARY HEMBER	The word House, Codford	BA12 ONE	
ACLO	RADATINICO	166 Market of	BA 14 1 LI	_
DV.	MUZ WANA	1615 Merker Sir	BAIJILL	
- Lit	ELENA GERAGATY	11. SPRINGFIELD	BA15/BA	
Li Wills	DAVID PHIPPS	MOS. Churnland	BA? THA	BA2
E PELKIC.	GARISANG PERIOR	KINGGIGEN CLOSE,	BAISTAW	
. Heat.	DEARIUM HUNT	436 REENLIND MILL	BAISIBL	
My Drend	MARILYN JANICE	10 SULLY	JA15 187	
M. Johnson		20 BIDBIRY CLOSE	BH1519G	
Petition organised by	JAVID J JUHNSON V Godfrey Marks (862202) BA15	20 BUD RIXY CLOSE 1NG, and Kate Nottage (866087) BA	BA15 1QG. 151SG 2	6