

Report to	Norwich Highways Agency committee 27 November 2014	Item
Report of	Head of city development services	Supplementary report to agenda item 5
Subject	Push the Pedalways – Tombland and Palace Street	

Purpose

To update the Committee on the progress over the past week, and provide additional information in support of the main report

Recommendations

That the committee:

- (1) Notes the results of the Safety Audit undertaken on the proposed plans for Tombland and Palace Street
- (2) Note that the detailed design will be further developed to meet the recommendations of the safety audit

Financial consequences

As part of the Push the Pedalways bid a budget of £360,000 was initially allocated to this project. During the development of the scheme it became apparent that this was insufficient to adequately provide the necessary improvements to the area. Following the cancellation of the £495,000 Earlham Road roundabout pedalway project the budget has been increased to £802,000. The proposed scheme is affordable within that budget.

Corporate objective / Service plan priority

The scheme helps to meet the corporate priority 'A safe and clean city' and the service plan priority to implement the Local Transport Plan.

Wards: Thorpe Hamlet

Cabinet member: Cllr Stonard – Environment, development and transport

Contact Officers

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Background documents

See main report

Introduction

1. The main report details the discussions that have been held with the Norwich School, and confirmed that the detail of the proposed courtesy crossing at the Erpingham Gate would be safety audited prior to your meeting.

Safety Audit Process

2. Any significant project undertaken on the public highway is subject to safety audit as a matter of course. The safety audit is undertaken by an independent and specialist team, who have taken no part in the formulation and design of the proposals. Safety Auditing is usually a three stage process.
 - Stage 1 – looks at the preliminary design, and highlights any particular issues that should influence the overall approach to the scheme. This was undertaken in May 2014, and no specific issues were raised at that time about the overall approach
 - Stage 2 is undertaken subsequent to the detailed design being completed, but prior to work commencing on site. The purpose of this audit is to look at the detail of the scheme, and to suggest improvements or changes to the detail of the design to maximise its safety
 - Stage 3 takes place after construction, to pick up any issues that have arisen as a result of the contractors work, highlight any omissions, and recommend further improvements if these are required
3. Following any safety audit, the design team then considers the report, and either accepts the recommendations, or produces an exceptions report, providing full reasons as to why the recommendations are not being pursued

The Stage 1 Safety Audit

4. In response to the concerns raised by the Norwich School, additional detailed design work was undertaken in respect of the proposed crossing point at Erpingham Gate and is included as Appendix 3a in the main report. This detail was submitted, together with the original proposal plans to the safety audit team. This would normally have been done after the scheme had received the go-ahead for the Committee, but in this case, the detailed design of this element has been brought forward in response to the school's concerns
5. Norfolk County Council's Safety Audit team undertook the stage 1 audit on the 19th November, and auditors were particularly asked to consider issues in the area at the time when school children were leaving the school
6. A copy of the Stage 1 Safety Audit is appended to this report. Members will note that the team included two specialist safety auditors and the Area Casualty Reduction Officer.

Response to Safety Audit

7. The City Councils design team have considered the safety audit report, and can see no reason not to accept the findings of the audit completely. The scheme will be further developed to fully take account of the advice received

Other Issues

8. A significant amount of correspondence (42 emails as at 3pm on the 25 November 2014), and a formal response from an advisor on behalf of the school has been received (copies of the latter were sent directly to some Committee members). This correspondence has not provided any additional information, or raised further issues that are not discussed within the report, except that the school have now raised additional concerns over the location of the loading bay, which was incorporated in the scheme particularly to meet the needs of businesses in Tombland. A copy of the school's submission, together with officer comments has been appended to this supplementary report.
9. Two way cycle tracks (for example at the Open Academy, and the City Academy) and courtesy crossings (for example at the City of Norwich School and Heartsease primary school) have been installed and operate successfully, providing safe access to schools for both pedestrians and cyclists.
10. A light controlled crossing point is to be retained on Tombland, approximately 40m to the south of the current location for the reasons discussed in the report. It is not possible to provide both this facility, and an additional one further north, as these facilities would be too close together to operate satisfactorily, and the justification for the chosen location (providing for more desire lines, and substantial improvement for cyclists safety (a significant issue in Tombland)) is discussed in the main report.
11. A loading bay, similar to that proposed in Tombland, has been built immediately outside the Isaac Newton School on Bethel Street. Currently, servicing in Tombland takes place from the pavement, causing complete obstruction of pedestrian movement. The proposed arrangement maintains a reasonable pavement width when the bay is in use (and the information provided by the traders suggests that this is only for very limited periods) and is only 13 metres long, so would only accommodate one large or two small vehicles at any one time.
12. Contraflow cycling successfully operates in a number of City streets (for example, Pottergate, St John Maddermarket and Upper Goat Lane) .It is the agreed position of this committee that contra flow cycling should be permitted in all one way streets wherever possible.
13. The county council's road safety officer for the city has indicated that he would be willing to build upon the existing work he does with the school, to develop an education programme about the new layout in Tombland, should the proposals be built.

Conclusions

14. Following discussion with the school, and the subsequent preparation of detailed drawings, a safety audit has been carried out, specifically considering the issues

facing children using a courtesy crossing in front of the Norwich School. The scheme can be revised to fully take a count of the recommendations of the audit

INTRODUCTION

This report contains the results of a Stage 1 Safety Audit carried out on the above scheme. The Audit was carried out at the request of Norwich City Council Development Directorate.

The Audit Team membership was as follows:-

Kevin Allen BEng (Hons), I Eng, MCIHT, MSoRSA (Audit Team Leader)	Project Engineer Network Analysis + Safety Norfolk County Council
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Julian Fonseca EngTech, MCIHT, MSoRSA (Audit Team Member)	Project Technician Network Analysis + Safety Norfolk County Council
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Specialist Advisors:-

Robert Daynes	Area Casualty Reduction Officer Norfolk County Council
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The Audit took place at Carrow House on 19 November 2014. The audit comprised an examination of the Safety Audit submission document and a site inspection by the Audit Team Leader.

The terms of reference are as described in Environment, Transport and Development Highways Service Manual Procedure SP03-07. The Auditors have examined and reported only on the road safety implications of the scheme as presented and have not verified the compliance of the design to any other criteria.

ITEMS RAISED AT PREVIOUS AUDIT

A previous Stage 1 Safety Audit was carried out on 14 May 2014. The scheme design has changed significantly for this audit and it is considered independently as a new scheme.

ITEMS RAISED AT THIS STAGE 1 AUDIT

1.0 General

1.1 No comment

2.0 Alignment

2.1 No comment

3.0 Junctions

3.1 No comment

4.0 Non-motorised Users

4.1 Location – Erpingham Gate, Tombland

Problem – Inadequate waiting area for pedestrians

The Preliminary Design Plan and Landscape Proposals Plan show a 1.5m pedestrian strip located on the carriageway side of the segregated cycle facility, within which pedestrians may wait when crossing Tombland. Given that this is an informal 'courtesy' type crossing it is important for pedestrians to be able to position themselves near the edge of carriageway to encourage drivers to cede priority. However, this 1.5m width will be inadequate during peak times, e.g. school finish times, to accommodate groups of pedestrians. It is likely that pedestrians will stray in to the cycle facility and be at risk from faster cyclists who believe they have priority.

Recommendation

Due to its place function and presence of a pedestrian crossing, pedestrians are likely to stray in to the cycle facility outside Erpingham Gate. It is therefore recommended

that the entire area coincident with the 12m long speed table shown on the Landscape Proposals Plan is designated as shared use. This better reflects how the area will operate, asserts caution on the part of cyclists and provides enough space for groups of pedestrian to congregate at the crossing point. The ramps for the cycle speed table (shown in dwg. CCAG13/FEA/02) should be located further back to coincide with the carriageway ramps and there should be a change in surface material to imply shared use. The Tactile studs should be provided over an increased crossing width.

4.2 Location - Erpingham Gate

Problem – Conflict between emerging motor vehicles and pedestrians crossing Tombland

The audit site visit was carried out during late afternoon at school finish time. As expected, groups of children were observed congregating at the existing signalised crossing point to the south of Erpingham Gate. Whilst the access is generally lightly trafficked by motor vehicles it was noted that higher numbers of cars, taxis and mini-buses left through Erpingham Gate at school finish time (see photograph). The audit team is concerned that with a queue of vehicles behind them, pedestrians will make rushed and ill-judged decisions to cross the road, increasing the risk of conflict with Tombland traffic.



Recommendation

Displace the informal raised crossing point to the south of Erpingham Gate. This will reflect the existing crossing desire line and move pedestrians clear of traffic egressing from Erpingham Gate. Alternatively, a wider crossing point (see paragraph 4.1) will enable pedestrians to disperse along a greater width of Tombland when waiting to cross and provide gaps for motor traffic.

4.3 Location - Palace Street: Bedding Lane to St Martin-At-Palace-Plain

Problem – Inconsistent cycleway provision raises risk of pedestrian conflict

Within a length of 40m the Palace Street cycleway/footway changes from segregated (cyclists offside) to shared use to segregated (cyclists nearside) to shared use again. Numerous changes are unlikely to be observed by users, pedestrians in particular, and increases the risk of conflict. It will also lead to confusing and excessive signing to highlight each change.

Recommendation

Provide an unsegregated shared use facility from the raised crossing south of Bedding Lane to St Martin-At-Palace-Plain. This provides a consistent approach and asserts caution on the part of cyclists where crossing activity is likely to take place.

4.4 Location – Tombland/Prince's Street

Problem – Crossing point lacks conspicuity

The controlled pedestrian crossing immediately south of Princes Street lacks conspicuity compared to the other informal crossing points to the north. In addition, this location is the 'gateway' to the scheme and further enhancement will aid 'readability' of the area and consequently improve driver behaviour

Recommendations

Provide bounded 'setts' within the carriageway over the pedestrian crossing width that are complementary to the materials used at other crossing points within Tombland.

5.0 Signs, Lighting and Markings

5.1 Location – Palace Street

Problem – Lighting column located within pedestrian route

An existing lighting column (No. 2175) is located within the footway. At present, this is offset and easily negotiable. However, when the segregated shared use facility is constructed it will be in the centre of the pedestrian section. It is likely that pedestrians will walk round the lighting column and in to the cyclist section, increasing the risk of conflict. For partially sighted users, the lighting column may be a direct hazard.



Recommendation

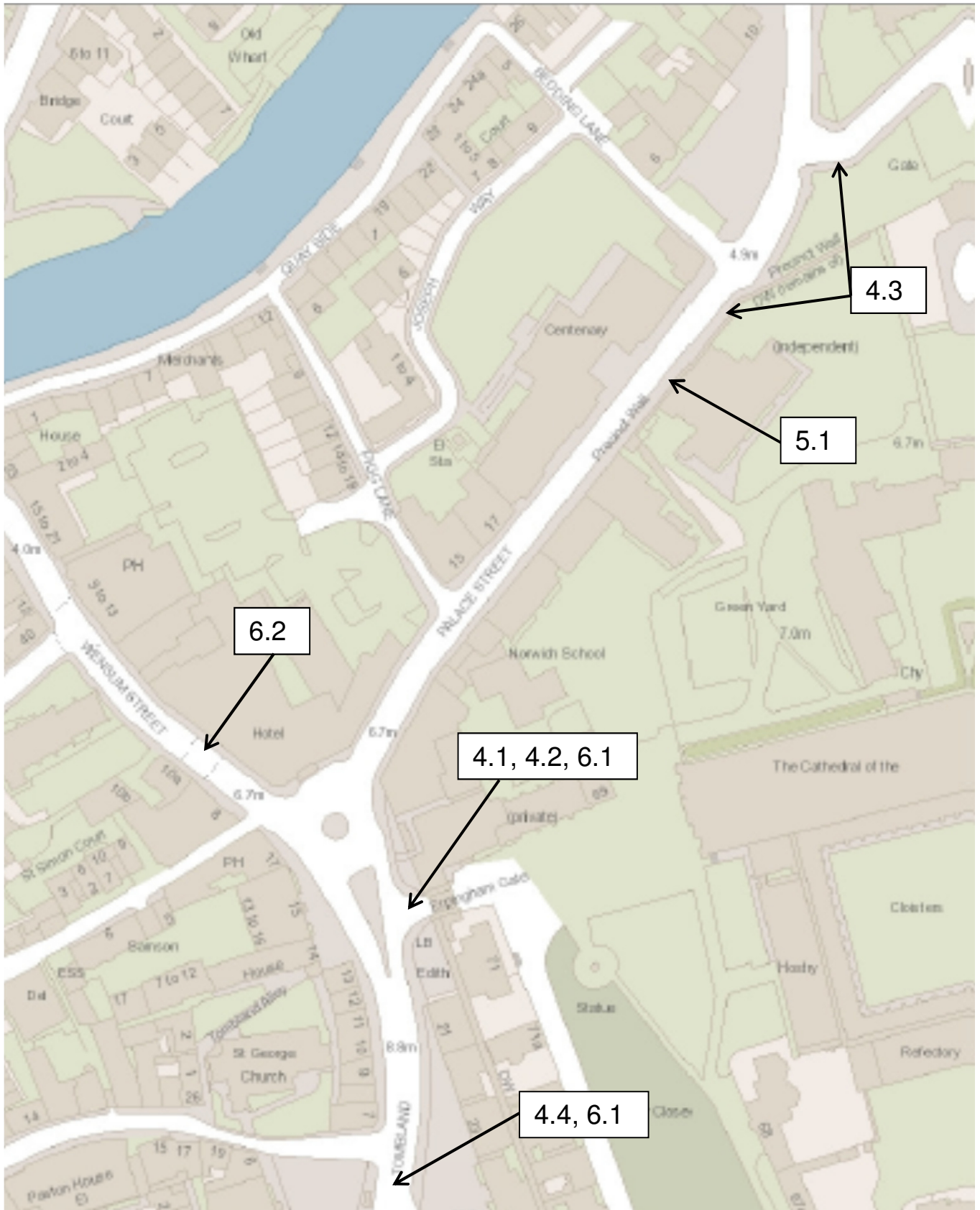
Relocate the lighting column to the rear of the segregated cycleway/footway.

6.0 Comments

Issues noted below are not necessarily safety issues. They relate either to wider network implications, suitability of a particular design choice or lack of information contained within the submission documents

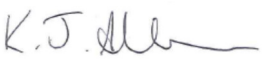
- 6.1 There are a number of inconsistencies between the various drawings submitted for audit, particularly in the Erpingham Gate and Princes Street areas of Tombland. All identified safety audit issues have been raised, but a consistent approach is recommended for audit of the detailed design.
- 6.2 An existing speed table is located on Wensum Street approximately 20m north of Waggon and Horses Lane. A new table is proposed for immediately north of the same road to aid pedestrians crossing. Two crossings in short succession will result in an uncomfortable ride, particularly for bus passengers. It is therefore recommended that the existing table is removed as it is less beneficial for pedestrians.

7.0 Problem Location Plan



AUDIT TEAM STATEMENT

We certify that this audit has been carried out in accordance with Norfolk County Council Environment, Transport and Development Procedures.

Signed (ATL)  Kevin Allen
Dated 20 November 2014


Signed Julian Fonseca
Dated 20 November 2014

RESPONSE SHEET

Problem (para no.)	Agree/ Disagree	Reasons/Proposals

To:- Team Manager (Network Analysis + Safety): fao Kevin Allen

From.....

Signed.....Project Engineer Dated:

Note: If producing your own version of this page please include **SAFETY AUDIT FILE NO/DATE** & ATL name



planning and regeneration

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Mr Andy Watt
Head of City Development Services
Norwich City Council
City Hall
St Peters Street
Norwich
NR2 1NH

24 November 2014

Dear Andy,

**Norwich Highways Agency Committee
Push the Pedalways - Tombland and Palace Street Proposals**

La Ronde Wright is engaged by Norwich School to respond to the above report on the proposals for Tombland and Palace Street which are to be considered at the Norwich Highways Agency Committee on 27 November 2014.

The proposals were originally scheduled for consideration at the October committee meeting. However, the matter was deferred until the November meeting to allow time for discussion of the concerns raised by Norwich School. The school is grateful to you for this and for your time on 7th November and to the City's Project Manager, Bruce Bentley and David Stephens, Team Manager, Norfolk County Council who attended the site to observe the traffic at the end of the school day on 12th November.

Norwich School appreciates the move by the Council to address the problems faced by road-users in the area and to introduce a new cycle route via Tombland and Palace Street.

The school welcomes the following proposals:

- To widen the footpaths especially around the Erpingham Gate and the Edith Cavell statue. This will ease congestion at the end of the school day when several hundred pupils exit through the Gate. It will also open up that area and make it more attractive
- To introduce the courtesy crossings along Palace Street and Wensum Street which would improve pedestrian safety as currently there are no crossings in those areas.

- The speed reduction to 20 mph and other traffic calming measures will improve general pedestrian safety.
- The introduction of dedicated cycle lanes along the busy Palace Street and Tombland may encourage more pupils and staff to cycle to school.

There are over one thousand children at the school. Several hundred of them enter and exit via the Erpingham Gate. However, the scheme seems to show a lack of appreciation of the vulnerability of school children using the road. It is essential that the scheme proposals are revised to address the needs of the children and other pedestrians and to promote a 'safety first' principle.

There have been earlier representations submitted by Norwich School and by parents of pupils at the school which articulate their concerns. However, the report to committee shows that the majority of those concerns have not been addressed including:

- A. the hazards of the proposed courtesy crossing at the Erpingham Gate
- B. the relocation of the light controlled pedestrian crossing to the junction of Princes Street
- C. the introduction of contra-flow cycling in the 'Tombland triangle' and
- D. introduction of the loading bay in front of the book shop, newsagent and sandwich shop.

The proposed courtesy crossing at the Erpingham Gate

This proposal is wholly unacceptable as it would result in worse pedestrian safety conditions than the current arrangement. It would be contrary to the good practice guidance in the Manual for Streets, 2007 (MfS) and the Manual for Streets 2: Wider Application of the Principles, 2010 (MfS2) which forms a companion guide to the Manual. The MfS provides best practice technical guidance for the industry on the design and improvement of streets in England and Wales with a particular focus on improving the quality of life of local people. It was prepared for the Chartered Institute of Highways and Transportation and endorsed by the Department for Transport. In its introduction, the MfS2 sets out the key principles of good design which include:

1. Applying a user hierarchy to the design process – putting the pedestrian at the top. The document explains that this means considering the needs of the pedestrian first when designing, building, retrofitting, maintaining and improving streets;
2. Emphasising a collaborative approach;
3. Promoting an inclusive environment that recognises the needs of people of all ages and abilities. It emphasises that design must recognise the importance

of legibility and way finding, especially with regards to the sensory and cognitive perceptions of children and other vulnerable people;

4. Recognising the importance of community function;
5. Reflecting and supporting pedestrian and cyclist desire lines in networks and detailed designs and
6. Striking a locally appropriate balance between the needs of different user groups

The courtesy crossing proposed at the Erpingham Gate is poorly situated and would not provide a safe means for children to cross the road. They would approach it with traffic travelling through the Erpingham Gate and then, without any priority over the traffic in Tombland, have to negotiate first the cycle route and then, with the tiniest of refuges between them, the vehicular traffic. A signalised crossing but failing that a zebra crossing south of the Erpingham Gate but no further south than the existing crossing is essential. This approach would accord with guidance in paragraphs 9.3.7 and 9.3.8 of the MfS2.

The courtesy crossing in the proposed location at Erpingham Gate would impact adversely on safety and the quality of life of the school children. Contrary to the guidance provided in the MfS2, the design has not adequately addressed all the safety issues in order to minimise the number and severity of situations in which road users are likely to be injured whilst using the public highway. A risk assessment of this proposal is therefore recommended before the designs are progressed for consideration or approval.

The relocation of the light controlled pedestrian crossing to the junction of Princes Street and Tombland

This location would not be an improvement on the current location if the courtesy crossing is not changed to a signal controlled or zebra crossing and moved further southwards.

The Introduction of contra- flow cycling in the Tombland Triangle

The introduction of this proposal would be dangerous to both the cyclists using this route and the pedestrians as it would be against the general flow of traffic in the one-way system.

It would result in collisions along the southern side of the Triangle and in particular, at the junction to St Faith's Lane as neither pedestrians nor cars emerging from St Faiths Lane would have clear visibility of cyclists approaching from the west.

Our clients note that the Tombland scheme is part of the Push the Pedalways project which includes in its primary objectives, ambitions to:

- i. Reduce the rate of accidents involving cyclists and pedestrians, and
- ii. Cut the carbon emissions from journeys within the city

Norwich School supports these long-term ambitions as they align with their own vision for this part of the City. Our clients are grateful for the opportunity to work with the Council to seek the best solution for the children and the thousands of visitors who visit the school and the Close on a regular basis. However, the school feels that it is imperative that the designs reflect these ambitions by promoting safe pedestrian routes which will encourage journeys to school on foot.

The introduction of the loading on Tombland in front of the book shop, newsagent and sandwich shop

The introduction of this loading bay would result in a very narrow pavement to the disadvantage of the pedestrian. It would also obstruct visibility of pedestrians crossing the road.

Equality Impact Assessment

The brief synopsis of this assessment states that “overall, the effects of this proposal are likely to be positive for potentially affected groups.” However, this is clearly not the case. The proposals for Tombland and Palace Street will greatly impact on the pedestrian user, particularly the children. However, it is evident from the designs and aims and objectives of the project that enhancement or preservation of pedestrian safety is not a priority for the project.

The proposal to relocate the signal controlled pedestrian crossing on Tombland to a position closer to the existing signalised crossing at Queen Street and further away from the desire lines of the vulnerable school children would have a significant adverse impact on the safety of the school children. This must be taken into account.

The Equality Impact Assessment outlines three ‘essential’ project objectives. These are:

1. To provide a safer route for cyclists
2. To reduce the amount of street clutter
3. To introduce a 20mph limit and reinforcement with traffic calming if necessary

There are no objectives with regard to improving pedestrian safety.

The Equality Impact Assessment submitted with the report to committee, 27 November 2014 was carried out on the scheme which shows a courtesy crossing at the Erpingham Gate in line with the vehicular access and egress from the Gate. This proposal would not provide a safe crossing for the pedestrian. However, the Equality Impact Assessment does not highlight any issues of concern. Although the assessment highlights the concerns raised at Section 5a. that “the moving of the current light controlled crossing from its current location will take it away from the desire line for schoolchildren, and will make them use a more dangerous alternative.” it indicates at Section 8 that there is no evidence to suggest that the proposal would have a disproportionate adverse impact on the vulnerable school children and that

overall the impacts are likely to be positive. We disagree that the proposals are satisfactory and would urge you to undertake a further impact assessment.

At a meeting with the scheme Project Manager on 21st November additional amendments to the proposals were discussed. These are still being considered by the Council. Our clients would therefore urge you to adjourn consideration of the proposals until satisfactory designs which reduce the clear risks to the lives of children are prepared and a further safety audit undertaken.

On the basis of the above, we would object to the proposed traffic regulation orders.

In summary, the following concerns remain:

1. The courtesy crossing at the Erpingham Gate is wholly unacceptable. It is dangerous. To leave the crossing as it is would be Wednesbury unreasonable. It would encourage waiting along the route of the cars entering and emerging from the Gate. Children would be forced into the carriageway by cars emerging from the Gate. Groups of children standing at the Gate at peak times would also obstruct the visibility of motorists departing from the Erpingham Gate. The children would have to negotiate both the two-way cycle traffic and the separate two-way vehicular traffic with the tiniest of refuges in between. All of this would have to be negotiated by them with no priority over the vehicular traffic and bicycles. Our clients would respectfully request that a signal controlled pedestrian crossing is retained where it is or located between there and the Erpingham Gate.
2. The proposals should have due regard to those likely to be adversely affected by them. The vulnerable school children who will be regularly crossing this road have not been adequately provided for. The proposals do not therefore adhere to the guidance provided in the MfS and should not be approved.
3. The signalised crossing should not be relocated if adequate provision is not made for the school children to enable safe crossing nearer the Erpingham Gate.
4. The proposed routing for cycles along the southern arm of the Triangle would be hazardous.
5. The proposals would not result in improved highway conditions for the pedestrian and should not be approved as designed.
6. The loading bay proposed in front of the newsagent's shop should be omitted.

I have enclosed a mark-up of our comments on the current scheme proposals for your attention and would welcome an opportunity to discuss these further with you.

Our clients would therefore ask you and the committee to adjourn a decision until the proposals have been revised to have due regard to the vulnerable school children who will continue to use this heavily trafficked part of the City.

Yours sincerely,

Nicole La Ronde

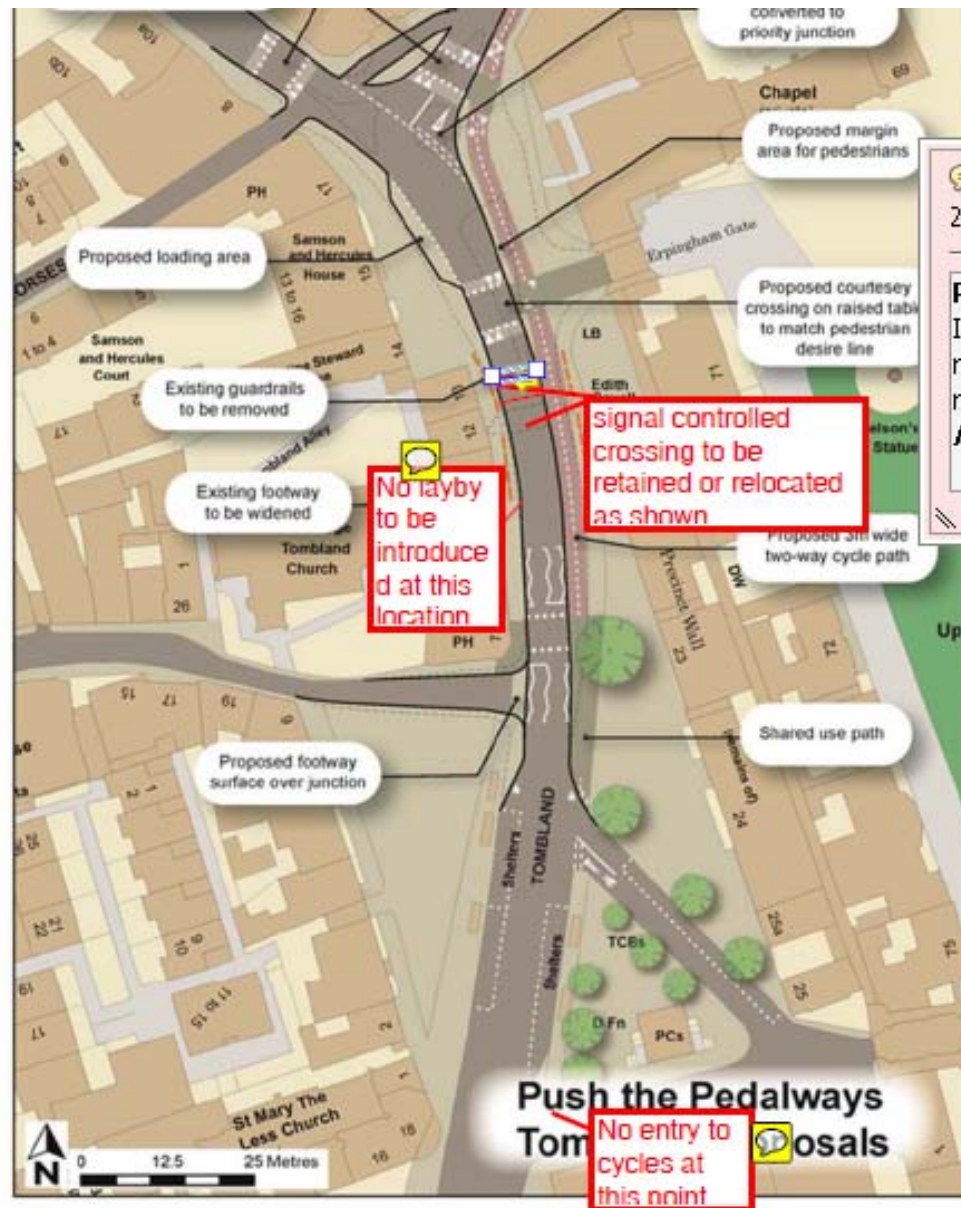
Director

LA RONDE WRIGHT LIMITED

nicole.laronde@larondewright.co.uk

Encl: Outline sketch showing proposed relocated crossing location

cc. Members of the Norwich Highways Agency Committee
Norwich City Council Project Manager - Bruce Bentley



▼ Nicole La Ronde

24/11/2014 08:42:56

Priority 1:

Indicative proposed relocation. The removal of this crossing without replacement could result in fatalities

High Risk

High Risk

Could result in fatalities

 **Nicole La Ronde**

24/11/2014 08:46:13

Priority 3:

Entry at this point would be extremely dangerous to both pedestrians and cyclists. This could result in injuries to children.

Moderate Risk

Norwich City Council Rebuttal to the LeRonde Wright Submission on behalf of the Norwich School

The proposed crossing at Erpingham Gate

It is acknowledged that Manual for Streets (MfS) recommends the design approach set out in the submission, and this is precisely the approach that has been taken. MfS does qualify the hierarchy in stating that it should not be applied rigidly

A collaborative approach has been taken, both by the use of a multidisciplinary team, and the involvement of the public and local business. The scheme has been amended where this is considered appropriate, to respond to the needs of the area

The scheme does recognise the needs of people of all ages and abilities and the importance of the community function. It provides substantially enhanced pedestrian areas, an increase in the number of pedestrian crossing points from one to six, whilst connecting a number of key cycling routes. It also provides facilities for local business to service their premises, whilst improving priority for public transport routes, and catering for the anticipated levels of general traffic.

The courtesy crossing at the Erpingham gate is not poorly located. This location has been identified as a key desire line for pedestrians, and there is already a significant level of movement throughout the day across the road at this point, despite the existence of the signalled crossing to the south, and the heavily planted central splitter island. It is a key principle of MfS that such desire lines should be catered for, particularly in important urban spaces, such as this one.

The drawing that was supplied to the school made it clear that the pedestrian priority was extended across the cycle route with cyclists being obliged to give way to pedestrians and this was pointed out to them. The safety audit acknowledges this, and has made a recommendation that this area is made larger; this advice will be taken, and the design amended accordingly.

MfS is clear that the primary issues that need to be addressed when considering the pedestrian are reductions in the amount of traffic, and reductions in speed. This scheme provides for significant speed reducing measures, thus improving the safety of the whole area for everyone, including children. Providing a light controlled crossing in the middle of the traffic calmed square would not achieve this important aim, and would encourage vehicles to travel at higher speeds when the light is showing green. The overall effect of the courtesy crossing in combination with the other measures is to cater for a key desire line, whilst slowing traffic to more acceptable speed. Forthcoming projects in Golden Ball Street and Rose Lane (part of the package of City Centre NATS measures currently under construction) will result in traffic reduction in Tombland as well, further improving the overall environment for users

The proposal has been subject to a safety audit; the school were aware that this was being done and a copy of this was supplied to the schools advisor before the submission was made. A copy is being supplied with the supplementary report.

Relocation of crossing

This is an improvement for the reasons detailed in the report. The new location picks up many more desire lines than the current one, fully in accordance with the MfS guidance, and provides a controlled and safe access for cyclists to and from all the cycle routes in the area. This is a clear example of a design providing the maximum benefit for the maximum number of users

In any case, there is no evidence to support the widely held view that light controlled crossings are necessarily safer than other forms of crossing.

The introduction of contra-flow cycling on the Tombland triangle

It is very clear from on-site observation that these manoeuvres are already made on a regular basis by cyclists, despite the current ban, and there is no evidence that this has caused any safety issues. This element has been part of the scheme since its inception, and has now been safety audited twice, with no concerns being raised. It is a stated aim of the committee to facilitate contraflow cycling on one-way streets where this is appropriate. In this case, there are clear desire lines, and facilitating these, whilst ensuring that other users are aware of the movement will clearly aid safety, and comply with the advice in MfS

The introduction of the loading bay outside the Tombland bookshop

This has been introduced to facilitate necessary loading by local business. Currently, this takes place on the very narrow footpath, completely obstructing the pavement. The level of use of this facility is expected to be relatively low, given the servicing requirements of local businesses, and consequently, most of the time, the area will be available for pedestrian use. Even when a vehicle is in the bay, an adequate area of footway will remain (in contrast to the present situation), and pedestrians will be able to stand on the kerb edge and see round any vehicle if they wish to cross here, rather than at the more formal crossing points which are available around 20m away in each direction. Again, MfS makes it clear that the use of the street for servicing is both essential for a thriving area and should be designed in as part of an overall scheme. The carriageway has been narrowed to reduce crossing time and vehicle speeds and consequently on carriageway servicing would adversely impact on public transport routes. It would also reduce visibility for pedestrians to a much greater degree than a vehicle parked behind the kerb line, as is proposed

Equality Impact Assessment

It is simply untrue to say that the assessment does not contain objectives relating to pedestrian safety. This is an overarching aim of the push the Pedalways project, and was one of the aims and objectives stated right at the start of the assessment. The items mentioned here are elements of the scheme that are considered essential

An Equality Impact assessment has to consider the scheme in the round, and the effect on the whole of a particular group, rather than a particular subset of it. The particular issue raised by the school was highlighted in the assessment, but overall, with the extensive pedestrian facilities, widened pavements and much safer cycling environment, the impact on children as a whole for journeys throughout the local area will be positive. Even if the schools concerns about the safety of particular crossing facilities could be justified (a claim that is not supported by the safety audit) it would still be the case that for children as a whole, the changes overall would represent an improvement over the current situation. Consequently there is no demonstrable adverse impact on this group.

Joanne Deverick	Transportation & network manager
Bruce Bentley	Principal Transportation planner