OFFICER DECISION REPORT - TRAFFIC REGULATION ORDER (TRO)

OUTCOME OF TRO PROCESS – DECISION (following objections)

5a

PREPARED BY: Traffic Management Team, Highways and Traffic Group

TITLE OF REPORT:	**Royal Victoria Park, Bath**
PROPOSAL:	**Cycle Lane**
SCHEME REF No:	**26-052A**
REPORT AUTHOR:	**Traffic Management Team**

1. DELEGATION

The delegation to be exercised in this report is contained within **Part 2 Section 2.35** of the Constitution under the **Delegations of Functions to Officers,** as follows:

Section A	The Chief Executive, Executive Director - Chief Operating Officer, Directors and Heads of Service have delegated power to take any decision falling within their area of responsibility…."
Section B	Without prejudice to the generality of this, Officers are authorised to: serve any notices and make, amend or revoke any orders falling within their area of responsibility.
Section D	An Officer to whom a power, duty or function is delegated may nominate or authorise another Officer to exercise that power, duty or function, provided that Officer reports to or is responsible to the delegator.

For the purposes of this report, the Director of Place Management and the Head of Highways Delivery hold the delegated power to make, amend or revoke any Orders.

2. LEGAL AUTHORITY

This proposal is made in accordance with the Road Traffic Regulation Act 1984, which under Section 1 provides, generally, for Orders to be made for the following reasons, and in the case of this report specifically for the reason(s) shown below:

(a)	for avoiding danger to persons or other traffic using the road or any other road or for preventing the likelihood of any such danger arising, or	X
(b)	for preventing damage to the road or to any building on or near the road, or	
(c)	for facilitating the passage on the road or any other road of any class of traffic (including pedestrians), or	x

(d)	for preventing the use of the road by vehicular traffic of a kind which, or its use by vehicular traffic in a manner which, is unsuitable having regard to the existing character of the road or adjoining property,	
(e)	(without prejudice to the generality of paragraph (d) above) for preserving the character of the road in a case where it is specially suitable for use by persons on horseback or on foot, or	x
(f)	for preserving or improving the amenities of the area through which the road runs, or	x
(g)	for any of the purposes specified in paragraphs (a) to (c) of subsection (1) of section 87 of the Environment Act 1995 (air quality)	

3. PROPOSAL

A new contraflow mandatory cycle lane, from the northwest entrance of Royal Victoria Park at the junction with Park Lane and Weston Road, enabling a southeast bound movement of cyclists along the access road along the southwest side of the carriageway and a new contraflow mandatory cycle lane, from the northwest access road to the Victoria Obelisk enabling southeast bound movement of cyclists. The cycle lane will be along the section of the carriageway on the eastern and northern side.

The cycle lane can be seen on drawings
10011941-ATRL-HGN-RVP-DR-CH-000110
10011941-ATR-HGN-RVP-DR-CH-000111
10011941-ATR-HGN-RVP-DR-CH-000112
10011941-ATRL-HGN-RVP-DR-CH-000113
10011941-ATR-HGN-QSQ-DR-CH-000115

4. REASON

Please refer to the Statement of Reasons.

The Council has had in mind and discharged the duty (as set out in section 122(1) of the Road Traffic Regulation Act 1984) to secure the expeditious, convenient and safe movement of vehicular and other traffic (including pedestrians) so far as practicable. It has also had regard to the factors which point in favour of imposing the Cycle Lane. It has balanced the various considerations and concluded that it is appropriate to promote a cycle lane. The Council has also considered and discharged its network management duty under section 16 of the Traffic Management Act 2004. It has concluded that the proposed Cycle Lane is consistent with that duty, having regard to its other policies and objectives.

5. IMPACT ON EQUALITIES

An Equality Impact Assessment has been undertaken in relation to proposed cycle lane which is available upon request. The Council has had due regard to the needs set out in section 149(1) of the Equality Act 2010. It considers that the proposed Order is consistent with the section 149 public sector equality duty, which it has discharged.

6. IMPACT ON HUMAN RIGHTS

The proposals are considered to have a minimal impact on human rights (such as the right to respect for private and family life and the right to peaceful enjoyment of property). However, the Council is entitled to affect these rights where it is in accordance with the law, necessary (in the interests of public safety or economic well-being, to prevent disorder and crime, to protect health, or to protect the rights and freedoms of others), in pursuit of a legitimate aim and proportionate to do so. The proposal(s) within this report are considered to be in accordance with the law, necessary, in pursuit of a legitimate aim and proportionate.

7. SOURCE OF FINANCE

This proposal is being funded through the City Region Sustainable Transport Settlement programme.

8. CONSULTATION REQUIREMENT

The proposal requires consultation with the Chief Constable, Emergency Services, Road Haulage Association, Freight Transport Association (Logistics UK), Parking Services, Waste Services, Ward Members and the Cabinet Member for Sustainable Transport Delivery.

The responses to the informal consultation can be found in TRO report number 3.

9. OBJECTIONS / COMMENTS RECEIVED (following the public advertisement of the proposal(s)

The objections and comments received are shown below, with an officer response to the objections underneath.

Respondents were able to respond to this TRO via Appyway, by email and via letter. 260 individuals responded directly to this TRO consultation and 1 respondent also objected to TRO26-052A in response to 26-052C. In total, **261** individuals indicated their support or objection during the consultation period.

Respondents were able to indicate their level of support or objection, select one or more reason for their support or objection and add free text to explain this further.

In this section levels or support and objection will be reported along with respondents' reasoning.

Table 1 overleaf shows the levels of support and objection among **261 individual respondents** in response to TRO 26-052A (Cycle Lane). In total **42 respondents supported or partly supported** the proposal, and **219 respondents objected or partly objected** to the proposal.

Support	Partly support	Neutral	Partly object	Object	TOTAL
31	11	0	20	199*	261

Table 1: Levels of support and objection for TRO 26-052A
*Including 1 objection noted in 26-052C

Respondents were able to select one or more reason for their support or objection relating specifically to the cycle lane element of the scheme, and this is tabulated in table 2 below.

Reason	Support	Partly support	Partly object	Object
Access	10	1	6	79
Disturbance	0	1	2	33
Environmental	2	1	1	25
Financial	0	0	4	70
Other	1	0	2	30
Parking	0	1	14	149
Safety	9	7	10	76
Traffic	6	6	5	59

Table 2: Reasons for support or objection to TRO 26-052A

The following section details the free text responses received in all components of TRO 26-052 in **objection** to TRO 26-052A (Cycle Lane). Responses are grouped into themes and the number of times a theme was mentioned has been tabulated overleaf.

Feedback theme	Number of references
Cyclists can already use Royal Victoria Park roads / it is already safe to cycle / cyclists can use diagonal path through the park	93
Alternative routes already exits / other cycle facilities are not used	97
The proposal does not reflect needs of cyclists	24
Not everyone can cycle / children may not be able to access the lane	25
Reduced safety due to cyclists speeding	37
Reduced safety because cyclists may not stop for pedestrians / reduced pedestrian safety	45
Children may run into the cycle lane creating safety risks	23
Cyclists passing each other will be unsafe / tulip wands are a hazard / lane is not fit for purpose	8
The proposal increases the risk of collisions or incidents	9
There are no metrics to support the proposal / there have been no accidents / no demand modelling	20
The route leaves cyclists on unsafe roads at the end	5
The proposal will create anti-cycling sentiment	3
Costly / waste of money / funding should be spent elsewhere	60
Visual impact of wands, markings and signage	15
Benefits are limited to a small number of cyclists while perceived disadvantages affect many people	101
Environmental damage / increased pollution	5
Previous consultation does not support / poor consultation process	7
The lane will be dark at night	1
Will cause disruption for drivers / demonizes car use	2

Table 3: Themes arising in free text responses in objection to TRO 26-052A submitted in all response to all components of TRO 26-052

OFFICERS' RESPONSE

In responding to the objections and comments on this TRO, reference has been made to the following local and regional policies, strategies and plans which are available using the following links:

- *Corporate Strategy 2023-2027*
- *Active Travel Masterplan*
- *Movement Strategy for Bath*
- *Balancing Your Needs: A parking strategy for Bath & North East Somerset*
- *Residents Parking Strategy*
- *Journey to Net Zero*
- *West of England Joint Local Transport Plan*

Officers' response to comments that cyclists can already use Royal Victoria Park roads / it is already safe to cycle / cyclists can use diagonal path through the park

The purpose of the scheme is not simply to provide a route for confident cyclists, but to create a clear, direct and inclusive connection as part of the wider Bath Walking, Wheeling and Cycling Links network. The aim is to connect surrounding homes and schools to the City Centre and park amenities. The council's strategic Active Travel Masterplan seeks to create a connected network that enables walking, wheeling and cycling for everyday journeys and is attractive to a wider range of users, including those who are less confident cycling on carriageways.

A number of respondents note that cyclists are currently unable to legally and safely cycle out of the park via the north west gate. The proposals create a two-way route which is currently not possible.

A number of respondents questioned the need for the cycle lane noting that the existing diagonal path through the park is shared by pedestrians and cyclists. However, this shared path is narrow and not segregated from other park users which increases the risk of collision. During wet weather it is not a suitable or safe surface for cycling.

The contraflow cycle lane and exit through the north west access road provides an inclusive, cohesive and segregated route through the park.

Officers' response to comments that alternative routes already exits / other cycle facilities are not used

While alternative routes exist, they may not provide the same level of directness or be as appealing for less confident cyclists due to the higher levels of traffic on routes along Upper Bristol Road and Weston Road.

A number of respondents note that cyclists are currently unable to legally and safely cycle out of the park via the north west gate. This proposal creates a two-way route for cyclists here which is currently not possible.

The proposals are part of a developing comprehensive active travel network linking surrounding homes and schools to the city centre and park amenities.

The Active Travel Masterplan identifies the importance of connected networks that link key origins and destinations and reduce barriers to active travel.

The scheme contributes to that strategic objective. The existence of other infrastructure elsewhere does not diminish the need to address specific connectivity gaps at this location.

Officers' response to comments that the proposal does not reflect needs of cyclists

The Royal Victoria Park scheme aims to improve access for anyone walking, wheeling or cycling – not just cyclists.

The cycle lane is designed to create a clear, direct, family-friendly route in an area of low traffic, that connects homes and schools to the City Centre and park amenities.

The scheme has been developed as part of the Bath Walking, Wheeling and Cycling Links programme, which aims to improve connectivity for everyday journeys and provide an alternative route for less confident cyclists that is segregated from the traffic and runs past the park's key amenities. The aim is to encourage more cyclists whatever their ability.

The council's Active Travel Masterplan identifies the need for infrastructure that supports a broader range of users and encourages active travel by making routes safe, convenient and coherent.

Officers' response to comments that not everyone can cycle / children may not be able access the lane

The Royal Victoria Park scheme (as a whole) aims to improve access and amenity for anyone walking, wheeling or cycling. The cycle lane is just one element of the scheme which also includes improvements to footways, crossings and lighting along the route.

We have retained access for vehicles from the northwest access lane and adequate parking on all four sides of the park itself for those who want or need to drive, including additional disabled bays near key amenities. We have also installed new short-stay parking bays along Weston Road that can be used by visitors to the park.

Five new raised crossings will support pedestrian access over the road and the proposed cycle lane. The introduction of heritage lighting along the route would extend the use of the park through the evening for both pedestrians and cyclists.

The proposed cycle lane follows the most direct route through the park via the play park enabling cyclists – including those learning to ride bikes - to avoid cycling north, uphill or through the park itself to reach these amenities. If we are to encourage children to cycle, we believe this is the safest, direct route.

Active travel schemes are designed to improve accessibility and travel choice for a range of users, including children, families and those using adapted cycles. The Active Travel Masterplan promotes inclusive infrastructure and recognises the role of active travel in improving accessibility and connectivity across communities.

Officers' response to comments that reduced safety due to cyclists speeding

The proposal provides a dedicated and clearly defined space for cycling movements where pedestrians should anticipate cycle movements and proceed over the lane and road with caution.

Additionally, the council expects all users of the cycle lane and roads through the park to behave responsibly and comply with the rules and restrictions on the highway and the Highway Code. This means being considerate of more vulnerable road users, including children and people with mobility aids, wishing to cross the road and cycle lane at designated crossing points.

The wider Royal Victoria Park scheme proposes five new raised crossings that will provide pedestrians clearly marked, safe and accessible points where they can cross. Being raised, they provide a clear signal to motorists and cyclists to slow down and allow pedestrians to cross safely.

The objective of the scheme is to encourage more people to choose active travel by providing clearer and more predictable movement patterns.

Officers' response to comments that the cycle lane will reduce safety because cyclists may not stop for pedestrians / reduced pedestrian safety

The scheme has been designed within a park environment where cyclists and pedestrians are expected to interact carefully, considerately and in accordance with the Highway Code.

This means being considerate of more vulnerable road users wishing to cross roads and cycle lanes including children and people with reduced mobility or using mobility aids.

As part of the wider scheme, we are proposing five new crossings, raised to the level of the pavement, which provide clearly marked, designated points for pedestrians to safely cross both the road and cycle lane. Being raised, they will encourage cyclists and vehicles to slow down to allow pedestrians to cross.

The Active Travel Masterplan emphasises the delivery of routes that are safe, accessible and suitable for a wide range of users while improving overall network connectivity.

Officers' response to comments that children may run into the cycle lane creating safety risks

The possibility of unexpected movements exists in many public spaces and all road users have a responsibility to exercise caution and have regard for their own and other users' safety. Noting that the road will be open for use by motor vehicles, it is expected that adults will continue to encourage children to stop when approaching lane/road and to cross safely.

The scheme seeks to create a clearly identifiable route for cycle movements, with coloured surfacing and separators all of which provide a visual reminder of the need to proceed with caution.

The Council's active travel policies seek to create environments that are suitable for people of different ages and abilities while encouraging healthy and sustainable travel choices.

Officers' response to comments that cyclists passing each other will be unsafe / tulip wands are a hazard / lane is not fit for purpose

The width of the cycle lane has been developed in accordance with relevant design standards. It is intended to provide a defined route for cycling movements highlighted by the tulip-wand separators.

The tulip wands were selected to provide effective segregation without presenting a trip hazard. This followed earlier public consultation feedback on a design featuring kerbed segregation which some people deemed a trip hazard.

The Council considers the proposal appropriate for its intended function. On balance, the tulip wands provide an attractive, flexible solution suitable for a park setting which are already being used successfully in Westminster, London.

The safety of the design would be monitored by ongoing safety audits post-construction. The purpose of the scheme is to improve route directness, continuity and legibility while supporting the broader active travel network.

Officers' response to comments that the contraflow cycle lane proposal increases the risk of collisions or incidents

The cycle lane proposal in Royal Victoria park has been subject to an independent road safety audit.

Contra-flow cycle lanes are nationally recognised cycle routes designed to create safe two-way routes for cyclists on one-way roads. They allow cyclists to use the same direct route on both legs of their journey, travelling with the one-way motor vehicle traffic on the road or travelling in the opposite direction to the one-way on a clearly defined cycle lane, safely segregated from the contraflow traffic.

We know that cyclists want to use this direct route through the park but cannot legally and safely do this. The segregated contraflow lane will allow cyclists to travel legally and safely in the opposite direction of the flow of traffic, and the clearly marked lane will highlight the potential presence of cyclists on this route to reduce the risk of collisions.

Officer's note that five new raised crossings would be installed in the park to support pedestrians crossing the road and cycle lane, further reducing the risk of collisions.

The Active Travel Masterplan identifies the provision of connected infrastructure and improved crossings as important measures for overcoming barriers to active travel and reducing severance.

Officers' response to comments that there are no metrics to support the proposal / there have been no accidents / no demand modelling

The justification for the scheme is not dependent solely on recorded collisions. In early 2026 we conducted several baseline surveys in the park that suggest a high number of pedestrians and cyclists will benefit from improved lighting, pavements, crossings and a clearly defined contraflow cycle lane.

Appraisal of the scheme indicates active travel use should increase due to the proposed improvements. We will continue to monitor the use of the scheme should it be approved.

Local and regional transport policies identify a need to increase active travel, improve accessibility, reduce community severance and provide sustainable alternatives to private car use. The Active Travel Masterplan, Movement Strategy and Journey to Net Zero all support investment in infrastructure that enables these outcomes.

Officers' response to comments that the route leaves cyclists on unsafe roads at the end

The Royal Victoria Park improvements form one element of the route between Bath City Centre and Weston which links into existing cycle routes on Weston Road and Queen Square, and it is our intention to further improve these routes.

The park's contraflow cycle lane ends at the Victoria Obelisk because at this point the road becomes two-way and there is no need to provide a contraflow lane for cyclists to safety travel on this route.

In the west, we have provided a way for cyclists to exit the park onto Park Lane where before they had no safe or legal way to do so due to the one-way system (southbound) for all traffic. While cyclists are at this point required to join the main road network, they can soon pick up the existing cycle route towards Weston which is due to be upgraded as part of the wider BWWCL Weston to City centre scheme.

The route has been subject to a road safety audit and will be also be monitored after construction if it is approved.

The Active Travel Masterplan sets out a long-term programme of interconnected routes and schemes. While individual projects may not resolve every issue on a corridor, they contribute towards the delivery of a more comprehensive network over time.

Officers' response to comments that the proposal will create anti-cycling sentiment

Officers recognise that views differ regarding the allocation of highway and public space. However, adopted transport policies seek to provide more equitable streets with space for everyone to travel, regardless of how they get around.

This is important because not everyone owns or drives a car or can afford to be dependent on one. Walking, wheeling or cycling outside is also good for people's health and mental wellbeing.

If we can provide more travel choice and enable more people to safely walk, wheel and cycle their shorter journeys (where able) it leaves more space on the road for people who do need to use a vehicle due to restricted mobility or because they live further away.

The proposal supports these objectives – it provides a more equitable space on the roads through the park for people walking, wheeling, cycling while maintaining vehicle access and adequate parking.

Officers' response to comments that the scheme is costly / a waste of money / and that funding should be spent elsewhere

Government funds allocated to the scheme from the City Region Sustainable Transport Settlement (via the West of England Combined Authority) must be spent specifically on strategic transport schemes, such as improvements to active travel and public transport. For instance, the funds cannot be spent on the pond, play parks or filling pot holes on the main highways.

Economic appraisal i.e. a costs-versus-benefit exercise showed that the Royal Victoria Park scheme is expected to substantially benefit the area in terms of public health, air quality, improved safety, reduced congestion on the roads and improvements in journey quality by people using the route.

These outcomes are identified within adopted local and regional transport policies.

Officers' response to comments on the visual impact of wands, markings and signage on a heritage park setting

Some visual change is inevitable when introducing new transport infrastructure. The original design was subject to earlier consultation, and the final design was developed with key stakeholder input on the separators, surfacing colour and cycling signage.

The measures are required to provide clarity for users and support the safe operation of the route. The Council considers the visual impact proportionate to the benefits achieved in terms of route legibility, accessibility and sustainable transport objectives.

Officers' response to comments that the benefits are limited to a small number of cyclists while perceived disadvantages affect many people

The proposal is intended to benefit a broad range of existing and future users, including cyclists, children, families and people making local trips without a car.

The cycle lane is part of the wider project which includes:

- *improved pedestrian access including resurfaced footways and installing raised crossings along the route to strengthen pedestrian priority and reduce traffic speeds*
- *introducing eco-sensitive, heritage lighting along the route to support safety and year-round use, especially during evening events*
- *maintaining sufficient, convenient parking provision along all four sides of the park and access road, including doubling the accessible Blue Badge spaces close to key amenities.*

The Active Travel Masterplan, Movement Strategy and Journey to Net Zero recognise that increasing active travel delivers wider public benefits through improved accessibility, health outcomes, reduced congestion and lower transport emissions.

Officers' response to comments that the scheme will lead to environmental damage / increased pollution

The scheme has been assessed for impact on environmental habitats and mitigations will be put in place to limit any harm.

The scheme supports the Council's objective of reducing transport-related carbon emissions by encouraging walking, wheeling and cycling as alternatives to private car travel. The Journey to Net Zero Strategy, Movement Strategy and Active Travel Masterplan all identify a shift towards sustainable transport as an important means of reducing environmental impacts and improving air quality.

Officers' response to comments that previous consultation indicated a lack of support for the scheme / that the statutory TRO consultation was poorly run

During the consultation on the BWWCL scheme in winter 2024/25, 59% of respondents said they did not support the proposals in Royal Victoria Park. However there was the highest interest in this scheme and the Weston to Bath City centre proposal was also the most popular scheme of the BWWCL proposals with 308 responses in support.

The key concerns raised about the scheme during this earlier consultation included loss of park access for vehicles via the northwest access lane, loss of parking provision, the design of the contraflow cycling arrangements, and compromised pedestrian access.

We took the feedback onboard and sought to balance the needs of all users. The current proposals include:

- *retaining the existing vehicle access from the northwest lane*

- *a more clearly defined cycling route with flexible separators and no kerbing*
- *improved pedestrian facilities, including resurfaced footways and raised crossings to improve accessibility and safety*
- *and eco-sensitive lighting to safely extend the use of the park throughout the year.*
- *maintenance of sufficient, accessible parking on all four sides of the park, including additional disabled bays close to key amenities.*

With regards to the TRO consultation being poorly run/confusing, we acknowledge that having four components to one proposal is complex for the public. However, this consultation was a formal, statutory consultation and therefore had to be conducted in a particular way – including separating out the four key components that were subject to different legal processes.

To support people during the TRO consultation, our correspondence directed people to our website and explained how the consultations would be run. We linked to each of the separate legal notices and consultation surveys so that people could respond to one or each of the four elements (the zebra crossing, the raised crossings, the cycle lane and the parking restrictions).

The feedback received for each of the four elements will be fully considered before a decision is made i.e. if someone made a comment about parking within the cycle lane consultation, we are considering their comments about both. All comments across all four elements will be considered and taken into account during this decision-making process.

Officers' response to comments that the cycle lane will be dark in the park at night

We are introducing eco-sensitive lighting along the route which will light the route to appropriate, safe standards.

Officers' response to comments that installation of the lane will cause disruption for drivers / demonizes car use

The potential installation of the scheme would be managed to reduce disruption within the park as much as possible, and the park will remain open for everyone to enjoy. Users may be required to access the park via an alternative route depending on the phase of construction, and temporary footways may be necessary during some phases of construction.

The scheme is designed to maintain access for all users and all modes of transport and make sustainable modes of transport more attractive. But we do not accept that these proposals demonise car users. We have retained access via the northwest access lane and retained sufficient, accessible parking bays along all four sides of the park. Officers recognise that views differ regarding the allocation of highway and public space. However, adopted transport policies seek to provide more equitable streets with space for everyone to travel, regardless of how they get around.

This is important because not everyone owns or drives a car or can afford to be dependent on one.

After the TRO was sealed, it was brought to the attention of the Council that a lengthy document objecting to the TRO was not taken into consideration due to a technical and administrative oversight and therefore was not placed before the decision maker.

Therefore, an officer delegated decision has been taken to revoke the previous decision and formally review the missed objection together with all previous objections, thus allowing the decision maker to make a fresh decision.

This provides a sound basis for rectifying the technical and administrative oversight whilst taking into account the public purse. It allows for the consideration of the missed objection together with all other previous objections submitted, whilst saving the time and costs of starting the process from the outset. If the decision remains to make the TRO, this option protects the timeline for implementation.

The following section of this report deals exclusively with the objections raised in this document.

Officers' response to comments on the nature of the Proposed Route - lighting does not address all of the personal-security characteristics of the location and whether surrounding roads provide any meaningful natural surveillance of the proposed cycle route, particularly after dark

The Equalities Impact Assessment (EqIA) for the scheme published on our website https://www.bathnes.gov.uk/sites/default/files/BWWCL_WESTON_EQIA.pdf recognises areas of limited visibility or passive surveillance in the park and identifies lighting, vegetation management and clear sight lines as mitigation.

A key improvement of this route is that the route will be two-way, creating natural surveillance by other users of the route. The presence of other people is a key principle identified in Safer Parks: Improving access for women and girls. The existing route through the park is one-way has almost no street lighting and requires cyclists to travel round the north carriageway and through a very narrow tree lined path from Weston Road. Encouraging active travel such as walking, wheeling and cycling will make the park busier and so has the potential to make a space feel safer. Integrating routes through the park into the active travel network can facilitate this.

Officers' response to comments that the Council's own description of the scheme says that the additional lighting is intended to support year-round use. We therefore ask what assessment has been undertaken against LTN 1/20 paragraph 15.3.2, and what evidence has led the Council to conclude that the circumstances identified by that paragraph do not present a significant problem here.

WECA's design assurance process which includes Active Travel England (ATE) representatives has been followed at preliminary design and detailed design stage and has been endorsed to proceed. An ATE route check has been undertaken, but indicators SP04, SP05 and SP06 were not scored for this assessment because they are placemaking indicators so therefore not required. The Street Check indicators which assess safety, accessibility, comfort, directness, attractiveness, and cohesion for people walking, wheeling, and cycling have been used as required.

It is important to note that the park is an existing walking and cycling route, and activities in the park include events in the evening. The proposed route is part of developing comprehensive active travel network. The section through the park will add an additional option for people in this area who can also use routes on Upper Bristol Road and Weston Road should they prefer. However, during winter when the park is still busy and during later summer events but dark the additional lighting will make the area safer for all road users including pedestrians and cyclists.

Officers' response to comments about natural surveillance - has the proposed route has been assessed against SP04, SP05 and SP06, and, if so, for the results of that assessment to be identified as part of the response to this objection.

WECA's design assurance process which includes Active Travel England (ATE) representatives has been followed at preliminary design and detailed design stage and has been endorsed to proceed. An ATE route check has been undertaken, but indicators SP04, SP05 and SP06 were not scored for this assessment because they are placemaking indicators so therefore not required. The Street Check indicators which assess safety, accessibility, comfort, directness, attractiveness, and cohesion for people walking, wheeling, and cycling have been used as required.

It is important to note that the park is an existing walking and cycling route, and activities in the park include events in the evening. The proposed route is part of developing comprehensive active travel network. The section through the park will add an additional option for people in this area who can also use routes on Upper Bristol Road and Weston Road should they prefer. However, during winter when the park is still busy and during later summer events but dark the additional lighting will make the area safer for all road users including pedestrians and cyclists.

A key improvement of this route is that the route will be two-way, creating natural surveillance by other users of the route. The presence of other people is a key principle identified in Safer Parks: Improving access for women and girls. The existing route through the park is one-way has almost no street lighting and requires cyclists to travel round the north carriageway and through a very narrow tree lined path from Weston Road. Encouraging active travel such as walking, wheeling and cycling will make the park busier and so has the potential to make a space feel safer. Integrating routes through the park into the active travel network can facilitate this.

Officers' response to comments about Active Travel England Guidance on Lighting – how has LTN1/20 been applied when deciding that additional lighting adequately addresses the personal-security characteristics of this particular route.

WECA's design assurance process which includes Active Travel England representatives has been followed at preliminary design and detailed design stage and has been endorsed to proceed.

We are proposing eco-sensitive lighting along the route which will light the route to appropriate, safe standards. Street lighting was the most popular measure proposed on this route at the 2005 public consultation. The improvements will also benefit women and girls already travelling through the park for access to schools, clubs and events. Feedback from Avon & Somerset Police and the council's event team expressed concern about the current levels of lighting in the park, particularly during events.

The proposed route is part of a developing comprehensive active travel network. The section through the park will add an additional option for people in this area who can also use routes on Upper Bristol Road and Weston Road should they prefer. However, during winter when the park is still busy and during later summer events but dark the additional lighting will make the area safer for all road users including pedestrians and cyclists.

Officers' response to comments that B&NES's own adopted design guidance - The Council's Transport and Development SPD 2023 also contains a clear statement under Safety and Security – Personal Security.

This document sets out our approach and expectations for new developments and re-developments, specifically in relation to walking, cycling, ultra-low emission vehicles, parking standards and travel plans and doesn't apply directly to this situation. However, as this response documents, the relevant guidance has been considered applied and endorsed for this proposal.

Officers' response to comments about evidence relating specifically to Women and Girls - The relevant question is not whether everyone is legally able to use the route after dark, but whether its physical characteristics create a material differential barrier to its practical use by women and girls.

The Equalities Impact Assessment (EqIA) explicitly recognises this differential impact between sexes.

It identifies lighting, clear sight lines, vegetation management and improved natural surveillance as mitigation. The ATE route check confirms that existing lighting is deficient and that the proposed scheme is expected to improve it, subject to ecological constraints.

As noted above, a key improvement of this route is that the route will be two-way, creating natural surveillance by other users of the route. The existing route through the park is one-way has almost no street lighting and requires cyclists to travel round the north carriageway and through a very narrow tree lined path from Weston Road.

The project introduces lighting to Royal Avenue where concerns have been raised with Avon and Somerset Police relating where pedestrians and staff encountered difficulties leaving events and vulnerability, particularly to young female staff due to lack of lighting.

Officers' response to comments about Public Sector Equality Duty

The Council has undertaken an Equality Impact Assessment (EqIA) and had due regard to the statutory needs. The EqIA explicitly recognises this differential impact between sexes.

It identifies lighting, clear sight lines, vegetation management and improved natural surveillance as mitigation. The ATE route check confirms that existing lighting is deficient and that the proposed scheme is expected to improve it, subject to ecological constraints.

As noted above, a key improvement of this route is that the route will be two-way, creating natural surveillance by other users of the route. The existing route through the park is one-way has almost no street lighting and requires cyclists to travel round the north carriageway and through a very narrow tree lined path from Weston Road.

Officers' response to comments about the Equality Impact Assessment - identify the Equality Impact Assessment, or other documented assessment of equality impacts, which will be placed before the decision-maker when determining whether TRO 26-052A should be made.

The Equalities Impact Assessment for the scheme published on our website https://www.bathnes.gov.uk/sites/default/files/BWWCL_WESTON_EQIA.pdf

10. ADDITIONAL COMMENTS FROM WARD MEMBERS AND CABINET MEMBER FOR SUSTAINABLE TRANSPORT DELIVERY (in response to the above)

Councillor George Tomlin

I have read and noted the TRO report and have no comments to make.

Councillor Paul Roper

Thank you for the TRO report 4 regarding the RVP Cycle Lane.
I have read the report, and I have no relevant comments to make.

Cabinet Member for Sustainable Transport Delivery (Councillor Lucy Hodge)

I am satisfied that all objections and comments, including the additional objection, have been fully considered. I support the implementation of the proposal as set out in the report.

11. RECOMMENDATION

That the Traffic Regulation Order as advertised should be sealed.



Paul Garrod
Head of Highways Delivery

Date: 23/10/2026

12. DECISION

As the Officer holding the above delegation, I have considered the report and the material accompanying it, the objections and supporting comments and specfically the additional information contained within the objections that were not placed before me previously. I also considered the officers' responses to the objections and the comments from ward members and the Cabinet Member. I have carried out the balancing exercise as required by section 122 of the RTRA1984 and considered the network management duty under section 16 of the TMA2004 before I made the final decision.

I have approached the matter afresh and have not treated the previous decision, the officer recommendation or the Council's adopted policies as determining the outcome. I have considered fully whether the objections, individually or cumulatively, justify modifying, abandoning or delaying the proposal.

I further note that the issue of deciding whether to implement any scheme is a matter of broad judgement, taking into account the wider aims of the Council rather than a purely mathematical analysis on the numbers of positive or negative responses.

I do acknowledge that 219 of the 261 respondents objected or partly objected to the proposal for a range of reasons. This level of opposition is significant and I have given it substantial weight within my considerations and have considered

the principal concerns raised about pedestrian and cyclist safety, personal security, the differential impact on women and girls, limited natural surveillance, the availability of alternative routes, the effect on the park setting, value for money and the adequacy of the consultation process. I am satisfied that these matters have been adequately addressed in the report and supporting material and do not justify modifying, abandoning or delaying the proposal.

I have then balanced the objections and adverse effects against the expected benefits of providing a lawful, direct and more coherent active-travel connection, improving accessibility, crossings, supporting safer and more sustainable travel, and contributing to the Council's adopted transport objectives. Consultation on transport and highway schemes is not a referendum. My decision must take account of the substance of the representations, the available evidence, the Council's statutory duties and the wider public-interest considerations.

I had due regard to the Public Sector Equality Duty within my decision including the need to eliminate discrimination, advance equality of opportunity and foster good relations, including the potential differential effects on women and girls, disabled people and other users with protected characteristics. I am satisfied that the identified mitigation measures are relevant and proportionate, and that the equality impacts do not require the proposal to be abandoned or materially altered. I do recognise that lighting on its own will not address every concern about personal security and that some parts of the route will continue to have limited natural surveillance. I have considered the measures proposed for lighting, sight lines, vegetation management, two-way use and monitoring, I am satisfied that the scheme will improve the current position.

Having considered the reasonable alternatives identified in the representations, including retaining the existing arrangements and relying on alternative routes, I am satisfied that those alternatives would not deliver the same level of connectivity, directness and accessibility. I have therefore concluded that the anticipated benefits of the proposal, together with the proposed mitigation and monitoring, outweigh the identified disadvantages. For those reasons, I do not uphold the objections and decide that the Traffic Regulation Order should be made as advertised.



Chris Major
Director for Place Management

Date: 28/10/2026