



York Civic Trust

Temporary Traffic Regulation Order in Coppergate Response to Consultation 2nd November 2021

This response to the Council's consultation on the future of the Temporary TRO in Coppergate has been prepared by York Civic Trust's Transport Advisory Group. The Group offers expertise in all aspects of transport policy and liaises closely with modal interest groups including Walk York, York Bus Forum, York Cycling Campaign and York Disability Rights Forum. We have also been invited to advise the Council on the development of its new Local Transport Plan, and have drawn on our broader recommendations in this response.

The consultation offers two options: to extend the Temporary TRO while improvements are made to ensure that the design is appropriate for longer term use, or to terminate the TRO and revert to the two way operation in place prior to June 2020.

We strongly recommend that the Temporary TRO be extended, and that urgent action be taken to design a more effective permanent scheme. We explain our reasoning below. We also offer the following specific recommendations, which are again justified below:

- 1. The Council should adhere to its hierarchy of users in designing the permanent scheme.**
- 2. It is demonstrably the case that Coppergate is of inadequate width to provide for safe pedestrian space and for vehicles in both directions. It is essential therefore that it remains one way for motorised vehicles.**
- 3. Footways should be widened to at least 1.8m on both sides, reduced to at least 1.5m on the NW side past All Saints Pavement.**
- 4. A signalised junction should be provided at the Clifford Street end, and all three crossings should allocate more time to pedestrians, thus reducing crossing delays.**
- 5. In the interest of disabled users, the opportunity should be taken in any redesign to achieve continuity of footway width, remove all obstructions and repave to avoid unsafe crossfalls.**
- 6. The carriageway layout should be designed to a standard width of 5.8m to provide for a 2.0m contraflow cycle lane, 0.3m of physical separation, and a 3.2m vehicle lane. Remaining width should be used selectively to widen footways or to permit loading.**

- 7. The junction with Clifford Street, or alternatively with Castlegate, needs to be redesigned to provide for safe access by cyclists.**
- 8. Throughout, the contraflow cycle lane needs to be signed as specified in LTN1/20.**
- 9. Improvements for buses and their passengers should be sought by:**
 - a. providing bus stops for diverted buses in Clifford Street as close to the junction with Coppergate as possible;**
 - b. upgrading the stops in Piccadilly to provide shelter, seating and real time information; and**
 - c. actively enforcing the existing bus gates in Piccadilly and Pavement.**
- 10. The Executive Member should ensure that all future Temporary TROs are approved with a clear specification for monitoring their impact, and that any resulting consultation is based on that objective evidence.**
- 11. More generally, the Council needs to take steps to ensure that its consultations are objective, and that all user groups are given equal opportunities for involvement.**

The temporary scheme as implemented

The scheme was implemented in June 2020 in response to the government's Emergency Active Travel Fund, and was to have been financed by it. Its main aim was to provide for social distancing for pedestrians in Coppergate. This required a reduction in carriageway width, which necessitated one way working, and the Council rightly concluded that cyclists should be exempt from that restriction. The scheme therefore included a contraflow lane for cyclists, who were also seen as beneficiaries.

Unfortunately, given the limited time for implementation, the scheme as implemented had a number of weaknesses. Specifically:

- the pavement widening for social distancing was provided by placing cones in the carriageway, with no temporary build-out of the kerb (as implemented effectively by other authorities); the resultant increase in pavement width was thus minimal;
- the contraflow cycle lane was only 1.1m wide, which is well below the minimum specified in government guidance; it was delineated by wands, which were not adequately maintained, and have since been replaced by cones;
- no safe provision was made to allow cyclists to access this contraflow lane from Clifford Street; indeed, in the early stages, there was no signing to indicate that they were permitted to do so;
- no signing was provided at the Piccadilly end to warn drivers (and particularly motorists outside restricted hours) that cyclists could be expected in the opposite direction, again in violation of government guidance;
- no signing was provided to alert pedestrians on the very narrow pavement alongside All Saints Pavement that the space inside the wands and cones was for cyclists; as a result pedestrians frequently spill into this area, putting themselves and cyclists at risk
- as the consultation indicates, no attempt was made to provide effective bus stops for passengers on diverted services.

We raised many of these concerns early in the scheme's operation, but no significant action has been taken to remedy them (other than to remove the cones once a decision had been taken that social distancing was not required). Nothing is said in the consultation about ways in which the scheme might be enhanced, and it appears that no further thought has been given to this in the 16 months since the temporary scheme was implemented.

Evidence on the scheme's impacts

It is a key principle of a Temporary TRO that data is collected before and during the scheme to assess its impacts. We would have expected that data to cover:

- changes in cyclist and pedestrian flows in the street
- delays to diverted vehicles (and principally buses and taxis)
- any resulting changes in patronage of buses or taxis
- attitudes of cyclists and pedestrians to the environment and safety in the street
- attitudes and experience of traders on the street
- any evidence on casualties and casualty rates on the street.

No such information is provided, and we are unclear whether any has been collected.

We were aware from the outset that a potential disadvantage would be delays to buses, and asked for information, which should be readily available from operators, on several occasions, but none was forthcoming. We are now told in the consultation that "the restriction has had a significant impact on bus and taxi services and their users owing to the longer distance travelled for services diverting via Clifford Street and Tower Street to Piccadilly". No indication is given of the source of this statement, or what constitutes "significant". We have instead carried out our own limited assessment. Comparing the time taken from Piccadilly to Clifford Street for buses using Stonebow, buses in the opposite direction take around 120s longer. For those using Merchantgate, the value is closer to 80s. These additional travel times are well within the allowance made by operators for congestion in the city centre and should not, in our view, be considered "significant".

The consultation also says that "bus stop and shelter provision is also poorer, with a number of bus services needing to use the bus stop by Banana Warehouse on Piccadilly, which has no shelter or seating, in place of using stops on Piccadilly which are of better quality". As noted above, this was a design weakness of the initial scheme, but should not be used as a justification for abandoning it. As York Bus Forum (YBF) has pointed out, stops could readily have been provided in Clifford Street, allowing inbound passengers more immediate access to the city centre. A stop for the #10 was finally provided by First York following a sustained YBF campaign.

The style of consultation

Any effective consultation should provide the evidence obtained in a clear and objective fashion, so that respondents can make their judgments without being influenced by officers' prior assessments. As the quotes above indicate, this has not always been the case in this consultation. It is not clear to us whether bus and taxi operators' views were sought in

advance of the consultation, but we are very much aware that no attempt was made in advance to seek the views of Walk York, York Cycle Campaign or York Disability Rights Forum. Unfortunately the statements quoted above give the impression that selective prior consultation has taken place.

Design considerations

The Council's hierarchy of users

The Council makes clear in its policy documents that it designs street space by giving priority to users higher in its hierarchy, which places pedestrians first, disabled users second, cyclists third, bus (and taxi) users fourth and private vehicles (which are not relevant here during restricted hours) below that. The clear message is that any modifications to Coppergate should be designed, within reason, to give priority to pedestrians, disabled users, cyclists and bus and taxi users in that order. We adopt this sequence below.

Pedestrians

The Chartered Institution of Highways and Transportation's 2015 publication *Designing for Walking* recommends that footways should be at least 1.8m wide, with a desirable width of 2.0m, and 2.6m alongside busy roads. It qualifies this by indicating that a reduced width of 1.5m is better than there being no footway, but this should not be a relevant consideration in city centres. In practice virtually none of the footway on either side of Coppergate is as wide as 1.8m. On the SE side it ranges from 1.8m to 1.2m, and as little as 0.9m past the unnecessary obstruction of the barrels outside the Three Tuns PH. On the NW side it ranges from 1.5m to a minimum of 1.1m past the corner of All Saints Pavement. These widths fail to satisfy current guidance, and are wholly inappropriate for a city centre street on which pedestrians should be able to browse frontage properties as well as walking past, without being forced into the carriageway.

The carriageway width at the NE end is below 6m, and thus below the government's minimum standard of 6.4m for a two way carriageway involving buses. The implication is that in this section, buses passing one another will need to be very close to the kerb, thus restricting further the space for pedestrians, and adding to their insecurity.

Signalled crossings are provided at the junction with Piccadilly and at the entrance to the Coppergate Centre. Crossing flows are often higher than person flows along Coppergate, yet delays for pedestrians are long, resulting in many crossing on red. Action should be taken to reallocate time at both signals and hence reduce crossing delays. Conversely the crossing at the Clifford Street end uses a zebra crossing, which can delay buses and taxis. We suggest replacing it by a signalised junction, which would also allow protected turns for cyclists, as discussed below.

It is demonstrably the case that the section of Coppergate NE of the entrance to the Coppergate Centre is of inadequate width to provide for safe pedestrian space and for vehicles in both directions. It is essential therefore that this section remains one way for motorised vehicles, and that the opportunity is taken to widen footways on both sides to 1.8m on the SE side and at least 1.5m on the NW side (where there are no frontage properties). The opportunity should also be taken to widen the footways SW of the

Coppergate Centre entrance to 1.8m on both sides, and to remove any obstructions limiting that width. A signalised junction should be provided at the Clifford Street end, and all three crossings should allocate more time to pedestrians, thus reducing crossing delays.

Disabled users

Disabled drivers are not permitted to use Coppergate in restricted hours, so for most disabled users access will be on foot or using wheelchairs. Those who cycle are considered below. The narrow footways, their variable width, frequent sections with substantial crossfall, and several unmarked obstructions make Coppergate extremely difficult for disabled pedestrians to use in safety.

The opportunity should be taken in any redesign to achieve continuity of footway width, remove all obstructions and repave to avoid unsafe crossfalls.

Cyclists

Coppergate is an essential route for cyclists traversing and accessing the city centre. The only alternatives for through movement involve using Lendal Bridge or Castle Mills Bridge, both of which have heavy traffic flows and are totally devoid of provision for cyclists. However, when operating two way, Coppergate offers no protection for cyclists, who have to share the unduly narrow carriageway with buses.

Under one way operation, cyclists using Coppergate in a SW direction travel with buses and taxis and provision for them appears generally satisfactory, though greater protection is needed to assist right turns into Nessgate.

Cyclists in the opposite direction have very poor provision at present. There is no protection for cyclists turning right from Clifford Street, and no action has been taken on the alternative proposal of routing them via Castlegate. Once on Coppergate they have no safe demarcated contraflow cycle lane until the crossing at the Coppergate Centre entrance. Beyond that the current contraflow lane is seriously substandard, and there are no warnings to pedestrians or drivers of the existence of contraflow cyclists.

Government guidance, in LTN1/20, makes clear that contraflow cycle lanes should be a minimum of 2.0m width, and that lanes shared with cyclists should be no more than 3.2m wide. The narrowest section at the NE end of Coppergate, between frontages, is around 8.8m, which is sufficient for two footways of 1.5m and 1.8m, a 2.0m contraflow cycle lane, 0.3m for physical separation using wands, and 3.2m for a single lane towards the SW. Towards the SW end the width between frontages is sufficient to provide for two 1.8m footways.

The carriageway layout should be designed to a standard width of 5.8m to provide for a 2.0m contraflow cycle lane, 0.3m of physical separation, and a 3.2m vehicle lane. Remaining width should be used selectively to widen footways or to permit loading. The junction with Clifford Street, or alternatively with Castlegate, needs to be redesigned to provide for safe access by cyclists. Throughout, the contraflow cycle lane needs to be signed as specified in LTN1/20.

Buses and taxis

While they are both of importance in providing sustainable access, buses and taxis come fourth in the Council's hierarchy, and should be treated as such. Given the impossibility of providing for safe two way vehicle movements in Coppergate, and the substantial benefits for pedestrians, disabled users and cyclists of the design proposals above, it seems to us inevitable that buses and taxis, and their passengers, will need to incur some additional travel time on the diversion route. As noted above, we do not consider an additional journey time of 120s as excessive in the circumstances. It is, for example, little more than the time for which pedestrians have to wait to cross at the Pavement/Piccadilly junction.

The key will be to find ways of enabling passengers to access the city centre as rapidly as possible, to be able to wait in comfort, and for delays to buses to be kept to a minimum.

We see three obvious steps to doing so:

- **providing bus stops for diverted buses in Clifford Street as close to the junction with Coppergate as possible;**
- **upgrading the stops in Piccadilly to provide shelter, seating and real time information; and**
- **actively enforcing the existing bus gates in Piccadilly and Pavement, which have been in place for some 30 years, but which the Council has failed to enforce for the last decade.**