



Birmingham's voice for cycling

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To whom it may concern,

I am writing this letter on behalf of Push Bikes in response to the Bath Row / George Street Traffic Regulation Order consultation finishing on 19th July 2018. Push Bikes is Birmingham's cycle campaign and a key stakeholder involved in the consultations around Birmingham City Council's Birmingham Cycle Revolution (BCR). We have been active in campaigning for better cycling conditions in Birmingham for over 40 years, and we have been very pleased to see the improvements that are being made for cycling in Birmingham now. However we are still concerned by the lack of high quality cycle infrastructure in these proposals.

We strongly object to the lack of provision of high quality cycle infrastructure in these plans.

We refer you to the WMCA Cycle Charter, which states that any highways schemes in the West Midlands should not require "expensive retrofitting" of cycle infrastructure later on, and that "cyclists [will be] given higher priority than in the past, utilising the User Hierarchy as a guiding principle." As the proposed plans for the bus gate do not show any provision for cycle users, let alone infrastructure "referenc[ing] European best practice", it is clear that expensive retrofitting later on will be necessary.

We have good reasons for believing that the potential flow of cycle traffic in this location could be very high. Around Five Ways island, and Broad Street, there is a high concentration of residential properties, office buildings and commercial properties. The area is served by a high number of bus routes, as well as a small but very busy train station, Five Ways. There is a high level of pedestrian traffic along the pavements, especially between Five Ways station and the offices around Five Ways island, and on Broad Street.

The route will provide:

- A route from residential areas in the south of Birmingham to areas of employment and entertainment around Five Ways.
- A route from the Broad Street / Five Ways area to Five Ways train station, for residents and workers.
- A route for city centre residents to access green spaces, especially Cannon Hill Park, in the south of the city.

We also refer you to the West Midlands Strategic Cycle Network (see Figure 1, in the 2017 West Midlands Cycle Design Guidance document) which identifies the A4540 between Five Ways and Bristol Road as a priority corridor. There has even been a Birmingham Cycle Revolution consultation on a route along here, in July 2014, which had sections of

cycle track being built along the A4540, as well as the relocation of bus stops into the running lanes to provide more space. The current A38 Bristol Road cycle track project includes the building of that A4540 Ring Road route up as far as Ryland Road.

We do not understand why the current plans for this junction do not include provision for a high quality cycle track, when the potential demand is clearly high as recognised in both Birmingham Cycle Revolution plans and West Midlands Combined Authority strategic network plans. The volume of pedestrian traffic and the potential volume of cycle traffic is too high for shared-use pavements to be a viable long-term solution, and with the ongoing squeeze on local government finances, it is vitally important that cycle infrastructure is installed as part of all highways projects.

Our recommendations are that the plans should be modified to include:

- (1) A bi-directional cycle track across the mouth of Bath Row that is separate from the pedestrian crossings. This should be designed so that it can be easily joined up with the cycle tracks along the rest of this route in the future.
- (2) No exit for motor traffic from Bath Row onto the Middleway. This exit is duplicating the Wheelleys Lane route and as such is pointless; there is no reason why motor traffic can not use Wheelleys Lane instead. The volume of cycle traffic currently crossing the entrance of Bath Row is probably greater than the volume of motor traffic exiting onto the Middleway. If a cycle track was built, the volume of cycle traffic would far exceed the volume of motor traffic exiting onto the Middleway. By making this section of Bath Row one way, more space can be given to the turning-circle for motor traffic turning across the Middleway into Bath Row, as well as reducing the number of traffic lights on the cycle track to only two.
- (3) A separate, parallel cycle track crossing on the Middleway, connecting George Street to Bath Row and the cycle track on the other side. To achieve this, the left-turn out of George Street onto the Middleway should be removed, and the freed up space used for a bi-directional cycle track. As the plans now suggest that only a short section of George street should be one-way, motor traffic will still be able to access the properties using other roads - providing small time advantages like this to cycle users is important in encouraging a shift away from car use to more active travel. By removing the left-turn out of George Street, pedestrians can be given more time to cross the Middleway, and cycle users can be allowed to cross in both directions on a single light phase. It would also mean that there would not have to be any 'cyclists dismount' signs on the narrow pavements on George Street, nor tight turns on staggered pedestrian crossings, and so the cycle infrastructure would be accessible for all cycle users, as per requirements under the Equality Act (2010) - (see 1.3.2 of the 2017 WM Cycle Design Guidance document, plus TfL's explanation about inclusive design and the Equality Act in their London Cycling Design standards.)

Regarding the level of information provided in this consultation, it is woefully lacking, and it is only possible for us to understand what is proposed through reference to the previous consultation in March. In doing so, we are having to make educated guesses about how the plans have been modified and changed. If we were not aware of the previous consultation and did not still have access to those documents, we would have a much lower understanding of these proposals. This is not the usual standard of documentation

provide by Birmingham City Council for consultations, and we hope that it is a one-off mistake.

Yours faithfully,

Chris Lowe
Chair of Push Bikes, Birmingham's cycle campaign.