

Appendix 3B Formal responses received

Dear Mr Nagle, Ms Hetherton and Mr Khan,

Re: Ensuring Disabled equity in your proposed Public Space Protection Order to ban cycling in Coventry city centre

One of our supporters has made us aware of your consultation regarding a proposed Public Space Protection Order to ban cycling in a large pedestrianised section of Coventry city centre.

As a Disabled People's Organisation working to ensure Disabled mobility justice and equity, we at Wheels for Wellbeing are very concerned that the proposed cycling ban is discriminatory under the Equality Act (2010): Many Disabled people use cycles as mobility aids, but cannot safely dismount and push a cycle either at all or for any significant distance. As such, many Disabled people who use cycles will be restricted from accessing shops and services if the proposed PSPO is enacted.

We ask you to amend your proposed PSPO and all associated signage in line with best practice, so that any PSPO enacted will clearly permit Disabled people, including those with invisible disabilities, to ride slowly and considerately at walking speed through the pedestrian area.

This alteration to the PSPO would not affect the ability of officers to issue penalty notices to anyone riding inconsiderately – including any Disabled people riding dangerously fast.

Similar approaches permitting Disabled cyclists to ride through otherwise pedestrian areas at walking speed only have been demonstrated by Wandsworth Borough Council and Transport for London at the ongoing Wandsworth Bridge and Boord Street bridge works respectively.

You are welcome to use, with credit to Wheels for Wellbeing, [the training documents and images resulting from our collaborative work at Wandsworth](#), (link is to our associated blog – links to downloadable documents in pdf and docx formats are in the blog) to assist in developing an inclusive, accessible PSPO for Coventry city centre, should any PSPO be deemed necessary following consultation and a comprehensive Equality Impact Assessment.

Please do contact us if we can be of further assistance: We would be very happy to discuss Disabled access in your public spaces further: We specialise in developing equitable options for pan-impairment Disabled mobility needs.

Yours Sincerely,

Kate Ball

Kate Ball she/her

Campaigns and Policy Officer

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Colin Knight – Director of Transportation and Highways
Coventry City Council
One Friargate
Coventry
CV1 2GN
(via email)

18 September 2023

RE: Proposed amendment to City Centre Public Space Protection Order (PSPO)

Dear Colin

I write to express my concerns over the possible amendment to the City Centre Public Space Protection Order (PSPO) to prohibit cycling (including pedal cycles and e-bikes) and e-scooters through the city centre, which is currently the subject of a public consultation.

I visit the city centre frequently with my family as a pedestrian and completely understand the concerns raised by Councillors in relation to anti-social cycling and e-scooter use in the city centre. I have seen some of it first hand. In my role, it is my priority to work to protect pedestrians but I do not feel that the proposed amendment to the PSPO will achieve this and will bring with it many unintended consequences.

I know that we have discussed this in the past. I want to be clear, I support enforcement against anti-social cycling but strongly believe that existing powers are sufficient; a total ban on cycling in the city centre is not proportionate.

Existing enforcement powers

I note that the existing City Centre PSPO already permits an enforcing officer to require any person cycling or skateboarding to do so in a careful and considerate manner and must dismount if requested, when continuing to do so would cause a danger to the public or public offence. The City Council therefore already has sufficient powers to tackle the problem of excessive cycling speed and no evidence has been brought forward to show this is not sufficient to deal with the public's principal concern.

I also note that the Police has powers to deal with any person riding illegal vehicles, such as e-scooters or powerful e-bikes which do not conform to the Electrically assisted pedal cycle regulations 1983, and which are likely to be the cause of much of the public's concern. These vehicles can be seized as they are uninsured which would be much more of a deterrent than civil enforcement. Given many users of illegal e-bikes are food delivery couriers, I am concerned that the potential fine will be "priced in" and not change behaviour. Seizure of vehicles by Police provides a much stronger deterrent for those who use their vehicle for work and I note that operations are already underway by Police to tackle this.

The amended PSPO is being proposed by the Council using powers granted in the Anti-social Behaviour, Crime and Policing Act 2014. Under that Act 'anti-social behaviour' means, inter

alia, 'conduct that has caused, or is likely to cause, harassment, alarm or distress to any person'. Given that most cyclists do not ride quickly through pedestrian areas, cause obstruction or are involved in collisions, the use of these powers to ban all cycling is in my view unjustified.

Equality Impact Assessment concerns for disabled cyclists

Guidance on the making of PSPOs, published by the Local Government Association, makes it clear that PSPOs will not be suitable in all circumstances, especially (as in this case) when the activities which would be affected have positive benefits. Other options should actively be considered before a PSPO is pursued, such as awareness-raising campaigns about the effect of certain activities on others. The guidance also advises that an Equality Impact Assessment should be carried out to assess whether a proposed PSPO will have a disparate impact on groups with protected characteristics. Wheels For Wellbeing, a charity supporting the needs of disabled cyclists, advise that according to their [research](#), the majority of disabled cyclists (75%) find cycling easier than walking. Often this is because it reduces strain on the joints, aids balance and alleviates breathing difficulties, with the same proportion using their cycle as a mobility aid, just like a wheelchair or mobility scooter.

Of those who use their cycle as a mobility aid, nearly half have been asked to dismount and walk/wheel their cycle, even when it might be physically impossible for them to do so. It is not apparent that the city council has taken these Equality impact Assessment concerns into consideration before proceeding with the consultation on the PSPO amendment.

Active Travel Design Guidance (LTN 1/20)

Guidance on cycling in Vehicle Restricted Areas (including Pedestrian Zones) is given in the Government publication Cycle Infrastructure Design (LTN 1/20). This states there should always be a preference for allowing cyclists into such zones unless there is good evidence this would cause significant safety problems.

LTN 1/20 notes that pedestrian areas are often important through routes for cycle traffic, as well as being important destinations in their own right. I note there is a considerable amount of cycle parking within the zone where cycling is proposed to be prohibited.

Requiring cyclists to travel longer distances, possibly on less suitable routes, will tend to suppress cycle trips and reduce cycle safety. This would be contrary to the policies of the City Council and national government. LTN 1/20 also states that cycling should not be restricted during any times where motor vehicles are permitted; I note that service vehicles are permitted to enter the zone at times.

In this case the proposed ban would sever important and well-used routes in both the north-south (Greyfriars La – Broadgate – Trinity St) and east-west (High St/Pepper La – Broadgate – Corporation St) directions. As you know, much of the western part of the area is planned to be redeveloped under City Centre South plans and it is important that cycling is integrated into the proposals. Banning cycling now will make it less likely this will happen.

LTN 1/20 does acknowledge that cycling can have an impact on the comfort of pedestrians, particularly visually impaired people, but refers to research showing that most cyclists self-regulate their speed as the density of pedestrians increases. Any problems associated with excessive cycle speed are therefore likely to be confined to a minority of cyclists, including

those which ride powerful and illegal e-bikes. I believe it is this sub-set of people and behaviour that needs to be tackled, rather than a blanket ban on cycling which will unreasonably affect the well-behaved majority.

In the light of the above I believe the negative effects of the ban are likely to outweigh its benefits and so do not consider it should be made. I do accept however that there may be issues which need to be addressed and I would be pleased to work closely with the city council Police and other stakeholders on how this can be done using the existing powers which focus specifically on those behaving irresponsibly and illegally, rather than a blanket ban.

I would also be happy to work with the city council in liaising with the food delivery companies who, in my opinion, should bear some responsibility for the education and behaviour of their delivery partners.

Yours sincerely

A handwritten signature in black ink, appearing to read 'A Tranter', with a stylized star-like shape above the first few letters.

Adam Tranter

Mayor's Cycling & Walking Commissioner



Coventry City Council
One Friargate
Coventry
CV1 2GN

9th October 2023

RE: Proposed Amendment to City Centre Public Space Protection Order (PSPO)

Dear Sir / Madam

Thank you for consulting with Transport for West Midlands (TfWM) on proposed amendments to the City Centre Public Space Protection Order (PSPO) to prohibit the riding of Ebikes, pedal cycles and Escooters in the pedestrianised area of Coventry City Centre.

The City of Coventry has made great strides in promoting active travel usage over the last few years and whilst an amendment to the PSPO could bring benefits to pedestrians, it would also restrict other active travel users, preventing access to high demand areas in the core of the City Centre. Based on this, we do not support this amendment in its current form - prohibiting the riding of Ebikes, pedal cycles and Escooters in all the proposed pedestrian areas. Instead, we would favour the retaining of cycle access through Broadgate, particularly the north – south connection between Greyfriars Road, the High Street and Trinity Street, but appreciate the case for banning cycling within the core and busier pedestrianised area covering Smithford and Market Way.

Strategic Transport Policy Implications (West Midlands Local Transport Plan)

The PSPO in its current form, may hinder the successful delivery of parts of our shared vision within the newly approved West Midlands Local Transport Plan (WMLTP). Within the plan, we promote a *“well-connected 45 minute region with 15 minute neighbourhoods, where people can travel to access what they need through a mix of walk and wheel, cycle and scoot, and ride modes”*.

Given the nature of the location of the proposed order, there is a concern of the displacement of cyclists onto less suitable or unsafe routes. This in turn may discourage people from accessing those everyday services and places undertaken for work, leisure and socialising and using the city centre. The proposals could also discourage new users from taking up cycling, given the strategic location of the PSPO.

Yet at the same time, our policies strongly support delivery of active travel infrastructure and networks which provide people with real choices for their journeys and integrate such active travel modes within the wider public transport network. This includes protecting pedestrians, especially if people feel unsafe walking in pedestrianised areas, which may also work against achieving our wider policy objectives. Given the city centre has received £40 million of investment for improvements to its public realm, to help revive its centre and encourage people to spend more time and money within its spaces, we appreciate the importance of protecting all active travel users, beyond that of cycling alone.

In terms of Escooters, while we appreciate private Escooters are currently illegal on the public highway, and Coventry's Escooter trial is yet to be agreed, future operational consideration of how this mode may interface with the PSPO should be factored into its design, in light of potential changes to legislation or possible trials.

Implications for the West Midlands Bike Hire Scheme

The proposed zone for prohibiting cycles is exceptionally close to several of our West Midlands Bike Hire docking stations. In particular, the docking stations near to Trinity Road, Queen Victoria Road, Corporation Street, and within the food quarter/public square bordering Pepper Lane and Broadgate, where a docking station appears to be included within the zones periphery.

The schemes e-bikes are further all pedal assist, and we are not able to restrict the rider (through technological enforcement) where they ride to and from, with legislation not allowing bikeshare providers to remotely lock vehicles whilst in use for safety reasons.

Such an order could potentially have a detrimental impact on the take up and usage of the West Midlands Bike Hire scheme. If the amendment does come into force, it is important to ensure that a safe north - south route through the city centre, as we propose through Broadgate is provided, whilst keeping the core Precincts area clear of cycling where pedestrian activity is at its busiest. This route should also be well promoted to any West Midlands Bike Hire scheme user, due to our docking stations proximity to the zone.

Equalities implications

Guidance on the making of PSPOs, published by the Local Government Association makes it clear that PSPOs will not be suitable in all circumstances, especially when the activities affected have overall positive benefits on people. We therefore feel alternative options should be considered, such as greater awareness-raising campaigns about the effects of certain activities on others. This could be looked at jointly with Coventry City Council and TfWM.

The use of tools such as Equality Impact Assessments are helpful in understanding whether the proposed PSPO will have a negative impact on groups with protected characteristics.

TfWM would be happy to work with Coventry City Council, to review the outcomes of any Equality Impact Assessment on the PSPO proposals, in order to help mitigate any negative impacts where possible. Noting that several disabled cyclists may find cycling easier than walking, where it acts as a mobility aid and dismounting their cycle may be physically impossible. We also appreciate that other disability groups may have valid concerns about the presence of cyclists in pedestrianised areas. Therefore, these concerns should be adequately assessed.

Active Travel Design Guidance (LTN 1/20)

Guidance on cycling in Vehicle Restricted Areas (including Pedestrian Zones) is given in the Government's published Cycle Infrastructure Design Guidance (LTN 1/20). This states there should always be a preference for allowing cyclists into such zones, unless there is good evidence that this would cause significant safety problems.

The guidance further notes that pedestrian areas are often important through routes for cycle traffic, as well as being important destinations in their own right. With a considerable amount of cycle parking within the zone, as well as our West Midlands Bike Hire Scheme on its periphery, requesting cyclists to travel outside of this pedestrian zone, could result in longer distances, and force cyclists to take less suitable and unsafe routes. In turn possibly suppressing cycle trips and reducing cycle safety and be contrary to the policies of the City Council, those with in our WMLTP and those set by national government.

As the guidance provides a range of separation measures, these could be applied to Coventry City Centre, allowing all active travel users to move freely. These could include distinct tracks for cyclists, wands, pedestrian-friendly kerbs, or use of different surfacing and these could be applied to our proposed, permitted cycle route through the Broadgate area.

Finally, it is important to note that within LTN 1/20 in paragraph 7.4.5, it states that cycling should not be restricted during any times where motor vehicles are permitted. Yet we are informed that this proposed restricted zone permits service vehicles at certain times of day, therefore going against national guidance and this may need to be reflected upon further.

Impacts on existing and future cycle route proposals

The proposed ban area, in its current form would sever important and well-used routes in both the north - south (Greyfriars La – Broadgate – Trinity St) and east-west (High St/Pepper Lane – Broadgate – Corporation St) directions.

To the western side of the city centre, proposals are also being put forward for redevelopment under City Centre South plans. It is important that cycling is integrated into these proposals and any PSPO does not hinder the promotion and use of cycling to serve new development as well as the city centre itself.

Other proposed options

Whilst TfWM appreciates the importance of safety for all users and that in certain circumstances a PSPO will be required, we feel in this case, retaining a cycle route through the Broadgate area - permitting cycling along a dedicated north - south route is more suitable. This could also be complemented with measures including:

- Ensure such a route meets LTN 1/20 design standards, delivers on clear, separation treatments, improves signage and provides clearer information on Coventry's city centre cycling network – highlighting clearly which routes cyclists should use which could avoid the pedestrianised zone. It should also be promoted by the West Midlands Bike Hire Scheme and through any future Escooter trial – encouraging riders to use appropriate roads and infrastructure, where it is legal to do so.
- Raise the awareness, skills and knowledge of the options and opportunities available to people to help them travel confidently and safely, along with campaigns about the effects of certain activities on others. This may include delivering on wider education and behaviour programmes for more targeted groups such as employees of delivery food companies.
- Or if such a route is not favoured, the City Council should explore making the area a 'Go-slow Zone' (walking pace riding only) in peak hours. This has been applied to other towns across the UK and has been successful in many areas.

Conclusion

To conclude, we would welcome further discussions on this matter where existing data on accidents and evidence proves contrary to TfWMs views, especially if those suggested options have already been pursued by Coventry.

The city has made great strides in promoting active travel usage over the last few years and is leading the way in promoting active travel along its key corridors. Considering the points set out above, we do not support this amendment in its current form - prohibiting the riding of Ebikes, pedal cycles and Escooters in all of the proposed zone. Instead, we recommend the PSPO extension be refined, and only apply to the core pedestrianised area of Smithford and Market Way, and that segregated cycle access through Broadgate is retained, particularly to support those important north – south connections for cyclists for onward travel to wider areas of the city.

Yours sincerely

Carl Beet
Head of Transport Strategy and Planning

I thought it would be easier for me to email than try and fill in the questions which didn't really allow me to put my views fully. I am putting forward these views in part on behalf of residents who have spoke to me about this as well as my own views and the reasons people have told me they don't consider cycling in the city at the moment.

My main concern is the very mixed messages this sends to people considering taking up cycling in Coventry. As a council we have made good moves towards being a city which is more accessible for active travel but currently the city centre almost feels like a blackhole for the cycle network and a total ban would make that worse not better.

I am not in favour of a total ban as I think there are better ways to deal with this including better signage, a coherent city wide cycle network including the city centre and in some cases using paint or similar to define where bikes should or shouldn't be in the short term until money can be found to put in dedicated cycle lanes.

That said I totally get that pedestrians must take priority in pedestrian areas, that's the whole point of having them however we should also be considering cycling and indeed things like mobility scooters. I am not totally against areas where cyclists are asked not to cycle and to push their bike if they need to access the area but these need to have suitable alternative routes around them which do not take cyclist a long distance out of their way and to be very clearly signed.

On mobility scooters I went to visit my mother who lives somewhere with an older population than we currently have and they have almost as many mobility scooters as we have bikes. There were places at many cafes and shops to park them and several places where you could borrow one if you don't own one. They take more space than bikes and we should consider them as well as our population will only get older.

I believe it is very important that we consider a city wide cycling network and include the city centre in that. Currently we have big new cycle routes including Coundon and Binley Road and they just stop short of the city centre with nothing to tell new cyclists where they go from there. In and around the city centre we have lots of bike racks and hire bikes but again no signage etc on where and how you should cycle so people guess and go where makes sense to them. We should be planning where and how we can put in cycle lanes on all roads into the city centre even if it is not possible to do all of them right away there should be a plan, and ideally a interim using paint etc where there is space to divide pavements etc.

I would like there to be more consideration on how to signpost cyclists, especially new ones on where they should cycle and how they should do it in a way which is encouraging not scary.. and the police will stop and fine you is scary enough to stop cyclists coming to the city centre which is surely not what we are aiming for, we should be encouraging more people not to drive to the city centre not the other way around.

I went and walked around the city centre looking at it in relation to cycling, my primary thoughts on the area under the PSPO were the following.

1) Broadgate – Coventry Cross Area through to Ironmonger Way/Cross Cheaping

I know that last is not currently in the area but it does have a high number of bikes due to the food shops and their delivery riders. I watched people in Broadgate for about 5 mins and did indeed see a

lot of cyclists, around 20 in 5 mins. About ¼ were delivery riders the rest were just people on bikes. All of them were going at a sensible speed, however as there is no cycle lane they crossed the square by many different routes. Most headed towards Cross Cheaping one side of Primark or the other but a couple went down the Upper Precinct.

Looking at access to Cross Cheaping I would certainly consider banning cycling from the covered passageway down the left side of Primark looking from Broadgate, it is steep and if you come out the end at speed you are in danger of hitting someone. However there is plenty of space to cycle the other side of Primark where the Coventry cross is there is plenty of space to have a cycle lane. Strangely it was the only place I saw a no cycling sign at the Ironmonger Row end.

I suggest a cycle lane is put in (this could just be paint for now) across Broadgate from Highstreet and down past the Coventry cross to Ironmonger Row. Some consideration to signposting appropriate routes in Ironmonger Road/Cross Cheaping would be good too. Without this cycle route (which is currently on the council cycle map) I can't work out how I would actually get from High Street to the north or west of the city.

2) Upper Precinct – Market Way – Smithford Way – lower Precinct

Ideally I would also have a cycle route from Broadgate down Upper Precinct but I get these areas are harder to incorporate cycling into. While I like the new planters and water features this has made it even harder and any cyclists are more in the way of pedestrians as there is a lot less space than there used to be.

If there is no space for cycling, then there should be clear signage asking cyclists to push their bikes and clearly signposting the nearest alternative route if they wish to circumvent the pedestrian area. Any chances to these areas in the future should be considering how to include a cycle route as well as pedestrian access.

3) Coventry South area ie City Arcade – Sheldon Sq, Bull yard and part of Market Way

These areas are up for redevelopment. There should be a commitment to include cycle routes, cycle racks etc within that space as there is no good reason not to have that in place. Until then clear signage should be put up if there is not space to cycle or where to cycle if there is space.

Other points to consider

4) There needs to be clear signage at any point that cyclists are required not to cycle on where alternative routes are and that they can still push their bike through the pedestrian area to an appropriate bike rack or indeed right through to get where they are going. The second is very important as I've already had reports of cyclists, including accompanied kids, pushing bikes to a bike rack being harassed by members of the public for having a bike in a pedestrian area so we need to make it clear this is OK.

5) Ebikes - please try and make it clear that the high powered ones are motorbikes and should not be used. The low powered ones can be very supportive for people who are less fit and help them get into cycling which is really important so demonising them is a very bad thing. I know it's tricky but not everyone using an ebike is a delivery rider.

6) Delivery Riders – These are a more sustainable way of delivering than most other options and as such we should be encouraging businesses to use them and not just for food but for that to work we need to be planning them into our city design which may mean things like taxi ranks but for bikes and so on so that they are not spreading out all over the place.

7) The wider cycle network needs some work especially in relation to the city centre, at the moment it is quite difficult to work out how to cross the city for many routes. Not everyone who gets to the city centre is going to the city centre, some are trying to go somewhere on the other side. There is a mismatched and incoherent system at the moment. I have already mentioned the two big dedicated routes just peter off when they get close but I've also been told the new road layout at Butts Road junction is not working for cyclists. I have been told that coming from Albany Way it does not work and peters out as it gets to the city centre side leaving cyclists scratching their heads on where they should go.

8) Consider using some of the cut throughs to the back areas of the shops for cycle routes though the city centre which are not main walking routes.

More than happy to chat and bring some regular cyclists I know to discuss what would make the city centre more welcoming to normal less confident cyclists and walkers at the same time.

Esther

Councillor Esther Reeves
Holbrooks Ward

email – esther.reeves@coventry.gov.uk