

Cambridge Cycling Campaign Bike Depot 140 Cowley Road Cambridge CB4 0DL

01223 690718

contact@camcycle.org.uk www.camcycle.org.uk

consultations@greatercambridge.org.uk Greater Cambridge Partnership

20th March 2022

Dear Sir or Madam,

GCP Mill Road Consultation Spring 2022

We write in response to the above consultation¹.

By way of introduction, Camcycle is a local member-led charity, working for better, safer and more cycling in and around Cambridge. We have over 1,600 members, a significant number of whom live in the Mill Road area.

Our vision for Mill Road is a lively, thriving, and safe street, full of independent shops, where there is good access to the street rather than *through* it, and an attractive streetscape that particularly welcomes local people to spend more time and money there.

We believe that the vision for Mill Road should be 'public transport, cycling and walking first'. Car access in and out of Mill Road naturally needs to be retained at all times for those visiting the businesses or accessing residences, but through-traffic should be restricted. This is in line with Local Plan, the Local Transport Plan strategy, national policy, and the views of local people.

The previous consultation with many thousands of respondents, found that 59% of people wanted to see the experimental bridge restriction kept².

The experimental TRO the previous year resulted in significant reduction in traffic which, together with the change on the bridge itself, made cycling and walking safer. Air quality was noticeably improved. These benefits, and more, should be brought back.

However, we believe that removal of through-traffic needs to be accompanied by complementary changes to the layout of the street. We believe the changes we set out below would have widespread

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¹ https://consultcambs.uk.engagementhq.com/mill-rd-consultation-2021-2022

² 2152 responses in favour of continuation, vs 1495 against. Even removing 623 potential duplicates, this is a majority in favour. See: Item 5, Appendix 3, final page, Q10, at https://cambridgeshire.cmis.uk.com/ccc_live/Meetings/tabid/70/ctl/ViewMeetingPublic/mid/397/Meeting/1709

support (even from those against the principle of the closure of the bridge to through-traffic) and that these would significantly reduce such opposition as currently exists.

Video presentation to the East Area Committee

Our comments in this letter should be read in conjunction with the presentation we gave at the East Area Committee earlier this week:

https://youtu.be/KkVHtq1k0KQ?t=1777

We strongly urge the consultant team to watch this video. It demonstrates the problems and our clear solutions.



GCP consultation themes

The GCP consultation sets out three themes. We strongly believe in options 2 and 3.

In summary, our views are, for each option:

Theme 1 - Do nothing: This would be totally unacceptable. 'Do nothing' means to continue the very high rate of collisions, pollution, and perpetuation of all the current problems like pavement parking. It has a significant cost: namely to the NHS and to the many businesses who lose out when traffic dominates an area. It would mean continued restriction of the independence of many people, particularly the old and young who are less able to walk, wheel and cycle along the street when it is dominated by high levels of traffic.

Theme 2 - Improve the quality of place: This is important, and the only way that the area will continue to thrive. However, improvements to the layout of the street, to rebalance it away from domination by

cars, are only possible if the traffic simply passing through is removed. Otherwise there is no space to do anything significant. This can be achieved in a way that retains Mill Road's quirkiness and avoids gentrification. There are normal high streets up and down the country that are safe and attractive, and full of shops and services catering to people of all backgrounds and levels of income.

Theme 3 - Changes to traffic and access in the medium and longer term: This is essential. Mill Road should have better access 'to' it, rather the space being given to those passing 'through' it. We believe there is common ground between ourselves and the traders' association that vehicles merely passing through provide no value to anyone. The problem is how to prevent this in practice. In our view, this means a restriction at the bridge, though there could be other solutions. A solution which significantly reduces traffic would transform the street for all those who live, work and visit the area. Many people who walk and cycle regard Petersfield and Romsey as severed because of the dangerous barrier of the bridge.

Removal of through-traffic: clear compliance with policy

Removing through-traffic from Mill Road is in line with:

- The Local Plan³. Policy 24 clearly outlines the future of Mill Road as "a low-speed traffic environment to restore the balance between people and vehicles" and to "emphasise 'place making' over vehicle movement". This is the main democratically-agreed policy for the area, and should have a very strong weight in decision-making.
- Cambridgeshire County Council policy. The Joint Adminstration Agreement⁴ says the council will put climate change at the heart of its work, and that it will "focus on modal shift to encourage more residents out of their cars, along with infrastructure development, the encouragement of sustainable travel, and securing safe routes and connections for pedestrians and cyclists". That policy is impossible to achieve until Mill Road no longer has 12,000 vehicles a day using it.
- Cambridgeshire & Peterborough Local Transport and Connectivity Plan (emerging)⁵. Almost every objective set out in the Combined Authority's policy is in line with removing throughtraffic from Mill Road and enhancing the quality of place.
- GCP Network Hierarchy (draft)⁶. This sets out Mill Road as an Area Access Street, along with other streets/roads as part of an overall strategy.
- National policy⁷. "The government therefore expects local authorities to make significant changes to their road layouts to give more space to cyclists and pedestrians."

Cambridge, like much of the rest of the country, has major problems with congestion, pollution, and collisions. Mill Road has particularly acute problems, and has had for decades. These problems cannot continue to go on for further decades, as the new government policy makes clear. Mill Road's traffic has

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³ https://www.cambridge.gov.uk/media/6890/local-plan-2018.pdf

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⁵ https://yourltcp.co.uk/

⁶ https://mobile.twitter.com/camcycle/status/1504504955788578818

⁷ https://www.gov.uk/government/publications/reallocating-road-space-in-response-to-covid-19-statutory-guidance-for-local-authorities/traffic-management-act-2004-network-management-in-response-to-covid-19

been identified as a problem since at least 1973⁸.

An overall plan for Mill Road

We believe that:

1. Restrictions must be put in place which allow 24/7 access but prevent through-traffic.

Removing through-traffic is an essential measure, without which no other measures will have any significant effect on the many problems the traffic creates on Mill Road.

By doing so, Petersfield and Romsey would be joined up, undoing decades of separation due to the dangerous situation on the bridge, and the traffic situation more generally, that divides the community into two.

Any bus gate should have exemptions for following key groups:

- Buses
- People cycling
- People walking
- Blue-badge holders

There are two other categories that various others have suggested could be exempted from a bus gate. Our membership does not have full consensus on these, and so these are not our formal policy, but we would be open to proposals that implement these in a sensible way:

- i. Traders' delivery vehicles that are known to deliver to both Petersfield and Romsey should be exempted, by whitelisting specific registration numbers. We understand from a key representative of the traders' association that this amounts to fewer than ten vehicles, and in our view this is not a significant number. Such an exemption could have the key benefit of making life easier for independent traders and reducing opposition to vehicle restrictions.
- ii. Licensed Hackney Carriages could also be exempted, which would be particularly helpful for those with disabilities. Disabled people use taxis twice as often as non-disabled people. The city centre restrictions already have an exemption for taxis. We would however not be in favour of allowing private hire cars over the bridge, as these are far greater in number.

As noted above, 59% of people wanted to see the experimental bridge restriction kept, either permanently, experimentally, or, like us, with modifications, so we believe there is a mandate for such a change. Exemption of blue-badge holders we believe would further increase what is already a majority of people in favour.

Exemptions of this nature are now achievable, thanks to the powers the County Council will receive in June, when the Traffic Management Act 2004, Part 6, will at long last be enacted. These powers already

⁸ https://twitter.com/PALythgoe/status/1495057605995204615

exist in London⁹, and so there should be no reason why they should not also work in Cambridgeshire.

2. A range of changes need to made along the street, to make it a more attractive and accessible street and to provide a natural traffic calming effect

The changes we would like to see, in no particular order, are:

- Properly-constructed pavement extensions that are fully accessible to people using wheelchairs
 and mobility scooters. In addition, planters offer a superior way to demarcate the edge of
 pavement expansions, as used by other councils around the country.
- Marked delivery bays, to facilitate deliveries and discourage use of pavements.
- Suspension or removal of delivery time restrictions. These are no longer necessary in most of the street now. For instance, we understand the butcher's shop at the foot of the bridge received a fine from a parking attendant, despite there then being plenty of space on the street to deliver at any time of day without causing conflict or congestion. Such restrictions on deliveries to shops are no longer necessary if there is no through-traffic mandating peak time restrictions.
- Increased cycle parking all along the street (on the roadway, not the pavement).
- Creation of short-stay car parking for shoppers. Without motor traffic using up all the roadspace, there would then be space for short-stay parking for shoppers who need to travel by car.
 Despite being a cycling campaign, our backing this demonstrates our commitment to a balanced use of space on Mill Road. This would be particularly useful near, for instance, antique shops, where purchases are far more likely to be made involving use of a car.
- Dedicated disabled car parking bays in safe locations.
- Improvements to access for those with disabilities or travelling by bus, including a community taxi service.
- A new shuttle-bus service along Mill Road.
- Better signage at each end of Mill Road, making it clear the street is open for business with full
 access to all properties. This could be enhanced with a gateway feature, e.g. a rainbow-shaped
 arch from Parker's Piece for instance, as both we and Arjuna have suggested.
- Suspension of the traffic lights at Gwydir Street, replacing with standard give way markings. There is no need for these lights to operate when there is no through-traffic. Their only effect is to make journey times for all users longer, particularly those trying to access the shops between Gwydir Street and the bridge, shops which need particular support for ease of access.
- Bollards and enforcement to prevent pavement parking.
- Repairs to existing dropped kerbs, and installation of new dropped kerbs.
- Moving existing cycle parking off the pavement, and provision of plentiful roadside cycle parking

Home&text=The%20council%20has%20agreed%20to,through%20their%20LTN%20road%20closure.

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 $https://www.ealing.gov.uk/info/201268/low_traffic_neighbourhoods/2766/blue_badge_holder_reside_in_low_traffic_neighbourhood_exemption#: \sim: text=Blue\%20badge\%20holder\%20reside\%20in\%20low\%20traffic\%20neighbourhood\%20exemption, -$

in areas where is presently little or none.

- Outside seating areas to provide space for customers of local food businesses. The council should actively canvass businesses to determine demand for this.
- Seating and social space more generally.
- Encouragement of, and help for, traders to consider cargo bike deliveries between premises and to customers.
- Tree planters next to the pavement widenings.

3. Work to reduce traffic around a wider area

Removal of queuing traffic on Mill Road needs to be accompanied by increased work to reduce traffic levels significantly throughout the city, thereby avoid displacement of traffic by providing alternatives to the car. However, this is not a reason for delaying resolution of the horrendous traffic situation on Mill Road.

We believe the future of Mill Road, and indeed the city, cannot be ever-growing levels of traffic. Change is necessary. The GCP's own network plan shows this agenda is moving forward.

Signs of success

We note that, despite the pandemic, Mill Road remained full of people walking and cycling to visit the shops.

New businesses opened up during the period of the pandemic, a clear sign of confidence in the street.

We observed parents with young children using and travelling along Mill Road, something which was previously not seen. Sadly this has become rare again. We saw many comments about improved cycle safety on the street, and many social media comments from people saying how much more pleasant the street was to visit and spend time and money at.

During the restriction, buses also were using Mill Road without long delays stuck in traffic. This is a very positive sign, and backs up our view that traffic reduction is an essential prerequisite to improving bus services, as there is little incentive to use a bus service that suffers the same delays as a car. Efficient bus use is strongly in line with transport policy.

Debunking myths

Drop in trade: The traders' association states that trade dropped during the period of the bridge restriction, without mentioning that this coincided with the pandemic, when high streets businesses up and down the country faced significant difficulties. The drop in trade quoted is broadly in line with the drop in footfall given in Cambridge BID figures for the city centre. In other words, any drop in trade can be attributed to the pandemic and not to the bridge restriction. Nor is it logical to suggest that Mill Road's shop are heavily dependent on trade from passing car drivers, because for most of the street, there is almost nowhere to park.

Disabled access: Some have argued that a restriction to through-traffic makes disabled access worse. We believe it improves it. For a start, the current situation is very poor for the wide range of disabilities.

Another local group, Mill Road For People, have produced a briefing¹⁰ (which we endorse), demonstrating this, and showing how removal of through-traffic would fix the vast majority of the existing issues. Secondly, and most importantly, a bridge restriction can now be achieved while exempting blue badge holders, due to the powers the County Council will receive in June, when the Traffic Management Act 2004, Part 6, will at long last be enacted.

Displacement of traffic: We believe limited weight should be given to the issue of displacement of traffic. Some have ostensibly argued that Mill Road should not have any action taken on it because it might cause displacement of traffic to surrounding roads like Coldham's Lane. However, there was no sustained increase in traffic during the period of the bridge restriction. We note that another local group, Mill Road For People, have analysed the council's own data to demonstrate this¹¹. The argument that nothing should be done on Mill Road until everything in the city is done, is impractical. Yet Mill Road should be very high priority for action, for the obvious reason that there are huge numbers of people walking and cycling in the area, with an appalling collision record and poor air quality.

This concludes our comments in respect of the consultation. We would be happy to add an	y
clarifications or discuss ideas further at any time.	

Yours sincerely,

Camcycle Trustee

¹⁰ https://millroad4people.org/wp-content/uploads/2021/07/Improving-disabled-access-to-Mill-Road.pdf

¹¹ https://millroad4people.org/wp-content/uploads/2021/08/Cambridge-Traffic-Data-Mill-Road-A-Street-For-People-2.pdf