**HTW-03-21 - Intention - Emergency Active Travel Schemes Results of Consultation**

1. **OBJECTION**

Dear Mrs Wayman / Mr Thomas

* 1. I object to your decision that the two “less well supported” of the five Tranche 1 schemes should be removed.
	2. I object to your decision that only the two “highest scoring” Tranche 2 schemes should move forward to further consultation.
	3. I also object to the timing of the decision, and ask for it to be deferred for review.

I make these objections on behalf of the Wiltshire Climate Alliance. In relation to the West Wiltshire schemes (Winsley, Bradford on Avon, Trowbridge, Hilperton) I also make these objections on behalf of Cycling UK.

I refer to the relevant documents and to the webpage <https://cms.wiltshire.gov.uk/ieDecisionDetails.aspx?ID=1732>.

1. **Consultation problems**
	1. Here is an excerpt from my 15 January email to Mr Khansari, (to which he replied the day before yesterday). It sums up issues with the consultation’s format.

“We are highly supportive of Wiltshire Council putting its own and government funds into active travel schemes, including road space reallocation. We are grateful for the opportunity to be consulted, as indeed government guidance requires. We appreciate the incredibly challenging current circumstances and timescales in which these schemes have had to be designed, bid for and implemented, and the consultation carried out. We note the Active Travel Fund's tight bid requirements.

Even so, at our meeting this week, the consensus was that the online consultation format did not allow members to respond as they wanted to, or help you get a full picture. The "Yes/No" support question on each scheme did not allow conditional, provisional or nuanced support/opposition. The text box did not permit structured responses. There was no way to upload documents, maps, plans etc. In some cases there is a need for queries and dialogue before taking a view.

* 1. The consultation plan did not include cycling or walking representatives or groups. Working relationships with such groups are taken for granted in other authorities such as Bristol and B&NES. As I wrote to Mr Khansari,

“You will of course be aware that Local Transport Note 1/20 Cycle Infrastructure Design, July 2020, includes these 'Public Interest Groups' in its illustrative range of stakeholders [Fig 3.3 on page 24]:

* *Cycling, walking and equestrian organisations*
* *Groups representing disabled people*
* *Local residents*
* *Local campaign groups.*

In Wiltshire the exception is Salisbury, where I understand you have worked with the Salisbury Cycling Advisory Panel since the start of Wiltshire Council.

* 1. The consultation plan mentions CATGs, but few of these, as far as I know, have cyclist or pedestrian representatives as members. In my case, many months after my first request I have been admitted to the Bradford on Avon district CATG. The notes of its 21 December 2020 meeting state,

“6h) Winsley to BoA Tranche 1 cycle scheme: Update was given at meeting”.

This does not amount to a consultation, and the next meeting is late February.

* 1. Your approach to the consultation seems to have been to treat it as an uncontrolled opinion poll or ballot on each scheme, after which you have ranked the schemes and used a process of elimination, pitting the “highest scoring” against the “less well supported”. This is problematic because there has been high-profile news and social media coverage of some of these schemes, and others easily confused or associated with them, e.g. in Salisbury and Bradford on Avon. This may have led non-cyclists to object to certain schemes in greater numbers and in some cases “on principle” or at the request of others.
	2. From the tables I have seen, you have not separated and considered responses from cyclists or walkers – the groups the schemes are intended to benefit – but aggregated them with other responses presumably mostly from drivers.
	3. I put this to Mr Khansari:

**Active Travel Fund schemes feedback.** Some of us have made thorough site visits to the Tranche 1 schemes, and are generating extensive feedback. As decisions will need to be made about withdrawing Tranche 1 schemes permanent, altering or withdrawing them, now is surely the time to get our in-depth feedback, and our considered input into Tranche 2.”

You have not yet taken this opportunity.

1. **Cyclist support for schemes**
	1. I also stated to Mr Khansari,

We do feel there is room for improvement in design, implementation and maintenance in some case, and a case for re-thinking in others. As funding will always be finite and schemes expensive, we want to represent the community as people cycling and walking and differently-abled people on scheme design and prioritisation.”

[continues]

In one or two cases, schemes may have features, such as intrusive or redundant defender bollards, or a lack of safe cycle provision at the ends, which may have made them less popular. Such features could be improved, and further consultation carried out, before schemes are removed.

* 1. In the case of the Tranche 1 scheme Brown Street and Exeter Street, Salisbury – Cycleway, the COGS group sent you a response giving detailed and reasoned support for the scheme, as well as the proposed Downton Road Salisbury Tranche 2 scheme.

This support should have been given significant weight, as it represents the views of cycling representatives with detailed local knowledge and long experience, who have been respected as consultees of yours for many years.

1. **Lack of information**

4.1. The report states “The following unpublished documents have been relied on in the preparation of this Report: None”. Yet it refers to “the Assessment Framework and the anticipated scheme costs and available budget”. I am not aware that this information is in published documents; alternatively, they have not been brought into the consultation set.

4.2. My 15 January email to Mr Khansari, added, “I look forward to hearing from you whether we can meet online with officers, who it might be with and who will be your best single point of contact, and perhaps some near-term date options soon enough to feed into the analysis stage for the consultation that ended 8 January 2021. We may well be able to send in some position papers prior to a meeting.

 In the meantime, can you please give us a preferred email contact for in-depth written feedback on the EATF schemes and a preferred date for receipt?

His 8 February email did not adress these particular requests.

* 1. I emailed Kirsty Rose on 25 January, asking if she could provide the technical drawings for these Tranche 1 schemes among others:
	+ Chippenham A420 Bristol Road and Chippenham Monkton Hill.

She kindly responded that she was “not involved in the other schemes you mention so do not have immediate access to the plans but will liaise with colleagues and come back to you in due course”. However, you have not provided this information to date.

* 1. Relating to point 2.5. above, I emailed Dave Perrett, asking,

“Is there a breakdown of scheme support by cycling category (regular/occasional/would like to/not a cyclist) by any chance? One of my concerns is that some of the scheme responses might have been conditioned by press and social media 'buzz' about the schemes, e.g. in Salisbury, potentially provoking 'statement' opposition from individuals not directly affected.

I'd like to learn the views of those the schemes are intended to benefit, i.e. cyclists (not forgetting walkers, but that wasn't a survey category).

If in case such a breakdown has not been done, I'd like to request the survey data, e.g. as a spreadsheet, so that I can analyse it for myself in various ways.”

 I added,

“I would not, of course, expect to see any personal data, but in the case of the 2% or 33 responses said to be from groups, I feel it is right for the identities of the groups to be known.”

He replied, without answering whether there is a breakdown by cycling category,

“ I have discussed this with our Information Governance team, who have advised me that your request should be treated as a Freedom of Information request. Therefore, I have forwarded your request to the FOI team, who will assist with your query.”

I have heard from the FOI team, who have given my request the Case ID 202001322 and a target response date of 5 March 2021.

It would be more constructive for an officer to carry out and release the breakdown requested.

1. **Conclusion**

5.1. The consultation process does not adequately support the decision.

5.2. There is sound evidence that cyclists, whom the schemes are aimed at, support schemes that are proposed for removal or for not taking forward.

5.3. Various information to support consultation responses is not available.

So I request that the decision is deferred and reviewed, requested information is provided and a sounder, more in-depth consultation is carried out.

Transport Secretary Grant Shapps has been quoted as saying that if councils failed to “show evidence of appropriate consultation prior to schemes” future funding allocations would be reduced and “clawbacks” could be imposed.

Kind Regards,

Andrew Nicolson

Convenor, Wiltshire Climate Alliance Transport Topic Group

West Wiltshire Right-to-Ride Representative, Cycling UK

10 February 2021, by email