****

**Bath Preservation Trust Response to Kingsmead Square: Experimental Traffic Regulation Order (ETRO) Consultation**

**Public Consultation**

**25/07/2022**

These proposals for Experimental Traffic Order (ETRO) in the Kingsmead Square area form part of a wider package of comprehensive measures to address the ongoing disparity between private car usage and sustainable transport access within Bath city centre. The ETRO is intended to complement B&NES’ High Street Renewal Project with rolling phases of public realm improvements at Kingsmead Square as well as other areas of the city centre.

BPT maintains that any access restrictions should be holistically considered as a broader part of traffic management plans and an overall masterplan or strategy for the public realm, including plans for high street renewal and regeneration, to better conceptualise how proposed measures integrate with other restrictions and public realm activation measures.

* We remain supportive of the opportunity for the increased prioritisation of pedestrian and cyclist access into and through the city centre and associated opportunities for public realm improvement, as well as the delivery of enhanced sustainable transport options.
* However, we maintain that this should be appropriately balanced against the need to sustain and enhance city centre access for disabled people and/or people with mobility issues to ensure our high streets remain inclusive and accessible for all.
* Could measures be introduced to address limited disabled parking bays (eg. free Blue Badge parking in all council parking spaces, as currently practiced by York City Council)?
* Kingsmead Square has become a popular ‘café culture’ style area with an increased offer of outdoor seating and places to eat and drink. The area is currently bisected by a number of through roads including New Street/Avon Street and Monmouth Street/Westgate Street which fragments the area and limits accessibility, as well as cutting it off from other adjacent areas of high pedestrian footfall such as Saw Close. Traffic restrictions would therefore help to better reconnect and reintegrate Kingsmead Square as a localised area as well as with its wider context. Maximising pedestrian access allows for improved accessibility and flow, as well as balance with increased provisions of outdoor seating which can otherwise conflict with narrow pavements and streets.
* The proposed 6-month trial of the proposed measures enables assessment of their effectiveness in practice as well as highlighting potential access/congestion issues that should be addressed as part of any permanent implementation of restrictions.
* There is a question of whether e-scooters will be permitted the same rights as cyclists in using Kingsmead Square during restricted hours.
* There is some disparity as to the proposed type of physical access restrictions to be implemented on the New Street access and exit onto James Street West. The “Prohibition of Motor Vehicles” plan suggests the use of “removable bollards, minimum 1.2m apart”, whereas the comments of the Chief Constable included in the Officer Decision Report makes reference to “lockable gates”. Hinged timber barriers and planters with Kingsmead Square branding are currently in situ at either end to restrict traffic (are these the “lockable gates”?). We maintain that further clarification regarding public realm alterations in relation to maintaining traffic restrictions would be helpful; the addition of new street infrastructure and/or furniture should be compliant with the standards set out in the Bath Pattern Book. In the case of the proposed bollards, we recommend these are recessive in colour, probably black, and have a cast iron ‘look’ where a bespoke design solution may be considered unviable due to cost.
* There is a valid question as to how proposed vehicle restrictions would allow for emergency vehicle access and general operation (eg. would these be manually opened between midnight and 11am?).
* The Project Area proposed for vehicle access restrictions (washed over in green) appears to include restricted access to the service/employee car park to the rear of Westpoint?
* Whilst outside of the remit of the proposed ETRO, it is noted that a key pedestrian access between Kingsmead Square and the city centre (via Westgate Street) is across Monmouth Street. The area is a popular pedestrian crossing point, but is also heavily used by HGVs and delivery vans, forms part of the bus route, and the sharp corner by The Stable restricts visibility of oncoming traffic. It would therefore be beneficial to address the vehicle-pedestrian user conflict that remains on Monmouth Street, possibly by introducing traffic calming measures or the use of road surfaces/markings to indicate pedestrian priority where appropriate, to reinforce and enhance the sustainable connection between Kingsmead Square and the historic city core.
* With the loss of standard parking spaces on Avon Street (the Officer Decision Report notes through traffic “seeking on-street parking opportunities in Avon Street”), there could be an increase in traffic seeking parking spaces at Kingsmead Square Car Park. Improved pedestrian links between James Street West and Kingsmead Square, particularly on the New Street access, would therefore help to balance pedestrian access with the two-way road into/out of Kingsmead Square Car Park and create a more inviting route into the area.
* Where public seating/street furniture is proposed, this should accord with the Bath Pattern Book with reference to designs, forms, colours, and finishes, to ensure a cohesive approach to public amenity space throughout the conservation area and World Heritage Site.