

Transport and Engineering



Active Travel Fund Tranche 1

Whitecliff Road (Keyhole Bridge)

Initial consultation formal representation
report

February 2022

Document details

Date:	Thursday 24 February 2022
Version:	1.0
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Introduction

Pre-amble

This document summarises formal representation relating to the initial consultation period for the Experimental Traffic Regulation Order on Whitecliff Road at Keyhole Bridge (ETRO/2). Formal representation refers to correspondence which was received in the 'ETRO Response' mailbox (ETROresponse@bcpcouncil.gov.uk). This includes:

- emails sent directly to the mailbox and its predecessor (covid-distancing@bcpcouncil.gov.uk)
- emails forwarded by councillors, council officers, or other council email addresses
- postal letters which were scanned across.

For the record, the email address of the mailbox was changed on 15 October 2020 following feedback that it could be misconstrued. Specifically, there was a concern that the purpose of the original mailbox appeared to be related to the enforcement of COVID secure workplaces and public spaces rather than the active travel schemes. The replacement email address was set up in a way so that correspondence sent to the old email address was automatically redirected to the new email address.

Originally, the consultation for ETRO/2 was scheduled to last for 6 months from 7 August 2020 until 23:59 on Sunday 21 February 2021. However, this did not transpire as planned:

- news of the scheme was reported by the Daily Echo in the 14-day period prior to formal advertisement
- the portfolio holder for Sustainability and Transport and the Leader of the council announced on 15 October 2020 a [review of temporary active travel measures](#), indicating that Keyhole Bridge would be re-opened to coincide with the completion of the road resurfacing in Poole Park
- on 15 January 2021, the consultation was curtailed. Following a review of all consultation responses received up to this point, plus discussions with ward councillors, the portfolio holder for Sustainability and Transport published their draft decision to revoke the ETRO and remove the road closure.

Despite these events, the mailbox was open throughout, continuing to collate feedback up until ETRO/2 was [formally revoked](#). Therefore, to ensure all formal representation is considered, this report covers the period between 24 July 2020 and 1 March 2021.

Scheme background

ETRO/2 was one of several active travel schemes trialled using Tranche 1 grants from the government's [Active Travel Fund](#). Tranche 1 funding supported the installation of temporary active travel projects for the COVID-19 pandemic.

Information about the original consultation for ETRO/2 can be found [here](#).

A timeline summarising the process to-date along with answers to frequently asked questions is provided on the [Keyhole Bridge Review consultation webpage](#).

Report structure

This report has been structured into four chapters:

- **statistical analysis** – details number of responses, levels of objection / support and trends over time
- **thematic analysis** – identifies key themes raised in the consultation feedback
- **additional information to report** – sets out pertinent contextual information
- **conclusions** – summarises the key findings.

Statistical analysis

Methodology

Appendix A includes notes on how formal correspondence has been classified.

Results

Totals

Altogether, there were 346 items of correspondence for ETRO/2 during the initial consultation period. **Table 1** below sets out the figures by correspondence type in terms of quantity and proportion. Rows have been ordered from largest to smallest.

Table 1 – Totals by correspondence type ordered from largest to smallest

Correspondence type	Quantity	%
Messages of support	168	49
Objections	83	24
Follow up message	72	21
Query	12	3
Neutral comments	11	3
Total	346	100

As shown in **Table 1** above, messages in support of ETRO/2 were double the number of objections.

Disaggregation by time periods

Table 2 below disaggregates the totals from **Table 1** into distinct time periods to reflect key events during the initial consultation.

Table 2 – Totals by time period

Time period	Feedback type											
	Objection		Neutral		Support		Follow up		Query		Total	
	Qty	%	Qty	%	Qty	%	Qty	%	Qty	%	Qty	%
Before 19/08/2020	8	53	2	13	1	7	3	20	1	7	15	100
19/08/2020 – 15/10/2020	11	29	0	0	24	63	2	5	1	3	38	100
15/10/2020 – 15/01/2021	16	9	7	4	106	60	41	23	7	4	177	100
15/01/2021 – 01/03/2021	48	41	2	2	37	32	26	22	3	3	116	100
All periods	83	24	11	3	168	49	72	21	12	3	346	100

For the time periods listed in **Table 2** above it should be noted that:

- before 19/08/2020 includes both:
 - the 14 days before the consultation start date on 7 August 2020
 - the 12 days from 7 August 2020 until 19 August 2020 when ETRO/2 was installed
- 19/08/2020 – 15/10/2020 refers to the 57-day period between the installation date and the date when a [review of temporary active travel measures](#) was announced
- 15/10/2020 – 15/01/2021 incorporates the 92-day period between the announcement of a [review of temporary active travel measures](#) and the publication of the [draft decision](#) to revoke ETRO/2
- 15/01/2021 – 01/03/2021 encompasses the 45-day period between the publication of the [draft decision](#) to revoke ETRO/2 and the date when ETRO/2 was [formally revoked](#).

Over the course of the trial, it would appear that both the review announced in October 2020 and the publication of the draft decision in January 2021 were catalysts for a significant rise in formal representation. The two periods following these events each saw over 50% more responses than the first two time periods combined. Correspondence peaked between the period 15/10/2020 – 15/01/2021.

Looking at objections, quantity grew as time progressed, climaxing in the period before ETRO/2 was formally revoked, when around 58% of all objections were submitted. Proportionally, objections predominated during the first and fourth reporting windows, amounting to between 40-50% of responses.

Conversely, the number of messages of support spiked between October 2020 and January 2021, when approximately 63% were received. The share of support outweighed all other correspondence types during the middle two reporting periods, when it accounted for roughly 60% of all responses.

Overall, these statistics insinuate that:

- people were more likely to object at the start or end of the initial consultation
- support was concentrated between the review announcement and publication of the draft decision.

Thematic analysis

Formal representation was thematically analysed to abridge the qualitative data into key themes / topics and to provide deeper insights into the reasoning behind people's views. The purpose of this is to illustrate any patterns and areas of consensus.

A series of main themes have been identified which act as the parent of a range of sub-themes. Where necessary, sub-themes have also been divided into sub-items to highlight particular nuances. Colour coding has been applied to highlight which aspects were mentioned the most.

Table 3 below displays the results of this assessment. In short, the analysis identified:

- 10 main themes
- 89 sub-themes
- 45 sub-items.

When viewing the results in **Table 3** it should be noted that:

- the themes represent opinions expressed by respondents and do not constitute fact
- themes are ordered from largest to smallest in terms of number of times mentioned starting with the main theme
- if a theme is mentioned the same number of times as another / others, then the themes are ordered alphabetically from A-Z
- the number of respondents who mentioned a theme indicates the magnitude of response. However, given the nature of qualitative data, this does not denote the significance of a theme
- where respondents have provided comments that relate to more than one theme, their feedback has been categorised into multiple categories. Because of this, the sum of all sub-themes or sub-items does not always equal that of its parent theme i.e., some people chose to mention more than one sub-theme or sub-item.

Table 3 – Full results from thematic analysis

Main Theme		Sub-Theme		Sub-Item			
Description	Mentioned by	Description	Mentioned by	Description	Mentioned by		
Advantages of closing Keyhole Bridge to motorised vehicles	211	Improves road safety	100				
		Stops motor traffic rat-running through Poole Park	91				
		Enhanced amenity / placemaking for cyclists and pedestrians	85				
		Necessary	59			Beforehand there were instances when motor vehicles did not give way to cyclists / pedestrians	29
						Bridge is too small for modern vehicles meaning it only suitable for cyclists and pedestrians	27
						Poor forward visibility at the bridge make it unsuitable for motor vehicles	15
						On-street parking and bends along White cliff Road mean its unsuitable for through traffic	6
						Passing cars splash pedestrians when driving through puddles that accumulate at the bridge	3
						Concern about structural condition of the bridge	1
		Supports efforts to decarbonise transport	33				
		Improves air quality in the parks	30				
		Encourages exercise / healthy lifestyle choices	22				
		Complements the access improvement works within Poole Park	15				
		Aligns with national / local policies	11				
		Supplements the ETROs on Birds Hill Road / Churchfield Road / Poole Quay and / or the protected cycle lane on Evening Hill	9				
Other routes are available for motor traffic to access the Park	7						
Better connectivity for users of Baiter Poole and Whitecliff Harbourside Parks	3						
Concept of traffic evaporation ¹ means concerns about displaced traffic can be overstated	1						
Could reduce road maintenance costs	1						
Reference to survey results ² published by the Department for Transport on 13 November 2020 which show public support for measures that reallocate road space for cycling / walking	1						

¹ A phenomenon whereby reductions in road capacity lead to a decrease in the amount of traffic. It the antithesis of induced demand, which in transport contexts transpires when new capacity attracts more users to the point when congestion / overcrowding returns.

² <https://www.gov.uk/government/news/175-million-more-for-cycling-and-walking-as-research-shows-public-support>

Main Theme		Sub-Theme		Sub-Item	
Description	Mentioned by	Description	Mentioned by	Description	Mentioned by
Consultation process	186	Reaction to the draft decision ³ published on 15 January 2021 and / or the final decision published on 28 January 2021 ⁴	98	Oppose	49
		BCP Council news article dated 15 October 2020 ⁵ indicating that the bridge would be re-opened to coincide with the completion of road resurfacing in Poole Park	82	Support	49
		Trial should continue for the full 6-months before any decision is made	16	Disagree with review	73
		Undertaking the trial simultaneously to access improvement works within Poole Park did not provide representative assessment conditions	13	Agree with review	9
		Leaflets distributed by BH Active Travel ⁶	4		
		Lack of consultation prior to implementation	3		
		Need for a balanced transport approach that is not preoccupied with cycling or driving	2		
		News of the scheme reported by the Daily Echo in the 14-day period prior to formal advertisement	2		
		Technical difficulties accessing / completing the online questionnaire	2		
		Using ETROs as a means of trial and error is farcical and not an adequate substitute for a rigorous impact assessment prior to any implementation	2		
Disadvantages of closing Keyhole Bridge to motorised vehicles	62	Displaced traffic onto surrounding roads	46	Orchard Avenue / Twemlow Avenue	28
				Congestion	22
				Sandbanks Road	19
				Pollution	12
				Longer journeys for motorised vehicles in terms of distance and / or time	7
				Safety	7
				Speeding	4
				Noise	2
				Sherwood Avenue	2
				Alton Road	1
		Commercial Road	1		
		Parkstone Road	1		
		Reduced amenity	1		
Unnecessary	43			No issues with the previous arrangement before ETRO/2	39
				Narrow carriageway and lack of visibility act as a self-enforcing traffic calming feature	9
				There is an existing traffic free route via the subway linking Park Lake Road with Newfoundland Drive	6

³ <https://democracy.bpcouncil.gov.uk/documents/s23073/Whitecliff%20Rd%20ETRO.pdf>

⁴ <https://democracy.bpcouncil.gov.uk/documents/s23472/Portfolio%20Holder%20Final%20Decision.pdf>

⁵ <https://www.bpcouncil.gov.uk/news-article.aspx?title=temporary-active-travel-measures-reviewed-as-part-of-wider-bcp-councils-transport-vision>

⁶ [BH Active Travel](#) is an independent group of local residents who have been campaigning for better cycling and walking infrastructure since the 1990s. The organisation undertook some canvassing during the initial consultation period. They are not affiliated to BCP Council.

Main Theme		Sub-Theme		Sub-Item	
Description	Mentioned by	Description	Mentioned by	Description	Mentioned by
				Insufficient number of cyclists, pedestrians or motor vehicles to warrant the closure	3
				Poole Park access improvement works are designed to deter through traffic	1
		Cyclist behaviour at the closure point	14	Speeds	13
		Loss of scenic drive for motorists	8	Not giving way to / near misses with pedestrians	10
		Makes it harder for the elderly / disabled to access the park	8		
		Concerns about vehicles turning around at the closure point	7		
		Does not address flooding at the bridge during inclement weather	7		
		Cycling is not a viable replacement for motorised vehicles	5		
		Waste of taxpayer money	4		
		Motorcyclists ignoring the closure	3		
		Induces anti-social behaviour / crime	2		
		Unfair on those who do not live near the park	2		
		Absence of mitigation from the start to manage diverting traffic	1		
		Reduces footfall for businesses operating within the park	1		
		Shared space between cyclists / pedestrians does not work in practice - segregation is better	1		
Speeds of electric scooter users at the closure point	1				
Complementary measures	45	Upgrade drainage at the bridge to minimise water accumulation	15		
		Additional planters / revised arrangement at the closure point to slow down cyclists	13		
		Cameras to enforce motorcycle compliance	6		
		Mitigation measures for roads affected by displaced traffic	4		
		Orchard Avenue / Twemlow Avenue	4	20mph speed limit	3
				Access only restriction	1
				Remove existing parking restrictions to enable on-street parking and foster a self-enforcing environment that keep vehicle speeds low	1
				Speed humps	1
		Resurface Whitecliff Road	4		
		Requirement for cyclists to dismount at the closure point	4		
		Cameras to monitor cyclist behaviour	3		
		More regular road cleaning during autumn months to remove fallen leaves	3		
		20mph zone on Whitecliff Road	2		
		Reconfigure the East Gate / cricket pavilion gate access to Poole Park to enable vehicles to exit onto Parkstone Road	2		
		At any time waiting restrictions on both approaches to the closure point	1		
Create turning heads on both approaches to the bridge	1				
Installing a mirror at the bridge	1				

Main Theme		Sub-Theme		Sub-Item	
Description	Mentioned by	Description	Mentioned by	Description	Mentioned by
Reiterates previous correspondence ⁷	44				
Query	28	Consultation period / road closure status	14		
		Number of complaints about alleged incidents between cyclists and pedestrians during the trial	7		
		Traffic monitoring to assess the impact of displaced traffic on surrounding roads	5		
		Volume of complaints about motorcycles supposedly contravening the ETRO	4		
		Freedom of Information Request regarding consultation results for formal representation and the online questionnaire	3		
		Data on cyclist / pedestrian usage at the bridge during the trial	2		
		Scheme objectives	2		
		Accident data	1		
		Roadworks associated with the access improvement works in Poole Park	1		
		Routes for motor vehicles to access the park during the trial	1		
Alternative measures	26	Closing the road within Poole Park to motorised vehicles	14		
		Improved signage at the bridge	6		
		Segregated cycle infrastructure	5		
		Speed humps	3		
		More parking restrictions on Whitecliff Road	2		
		A partial closure with exemptions for blue badge holders	1		
		Lower speed limit	1		
		Removable barrier allowing the bridge to be temporarily opened for emergency access or when there are roadworks on Sandbanks Road	1		
		Shuttle working at the bridge using traffic signals	1		
COVID 19	21	Closure helps facilitate social distancing	8		
		Width constraints at the bridge mean social distancing is not possible regardless of whether the road is closed	8		
		Uptake in cycling and exercise during lockdown was a temporary phenomenon brought on by the extraordinary circumstances and does not represent long-term behavioural change	6		
		Confusion regarding whether the trial was a short-term measure to facilitate social distancing during the pandemic or a longer-term initiative to improve facilities for cycling / walking	1		
Pre-existing concerns / matters not directly related to the scheme	13	Behaviour of cyclists	5	Incompetency / lack of training	4
				Not wearing helmets or having appropriate clothing / lights at night	2
				Riding in areas where they should not be i.e., footways and pedestrianised areas	2
				Bicycles in unroadworthy state	1

⁷ Refers to correspondence which repeats points already made by a respondent via previous messages.

Main Theme		Sub-Theme		Sub-Item	
Description	Mentioned by	Description	Mentioned by	Description	Mentioned by
		Speeding	5	In 20mph zones	2
				Along Sandbanks Road	1
				Hunt Road	1
				Recreation Road	1
				St Marys Road	1
		Vehicles ignoring parking restrictions	2	On Sandbanks Road	1
				On Twemlow Avenue	1
		Behaviour of electric scooter users	1		
Drivers disregarding traffic signals	1				
Dog fouling on the beaches	1				
Unauthorised encampments in Poole Park	1				
High Court judgement on 20 January 2021 relating to Transport for London's Streetspace Plan ⁸	1				
Access improvement works in Poole Park	3	Disturbance to Orchard Avenue / Twemlow Avenue from HGVs and construction traffic	1		
		Extra traffic on Orchard Avenue / Twemlow Avenue between May and July 2020 when the Seldown entrance was closed	1		
		Removal of roundabout makes it harder for vehicles to turn around	1		

⁸ The [Streetspace Plan](#) involved creating new protected cycle lanes, wider footways and reducing through-traffic in residential areas within London. The scheme on Bishopgate in the City of London was initially [ruled unlawful by the High Court of Justice](#) (Queen's Bench Division, Planning Court). However, this ruling was subsequently [overturned by The Court of Appeal](#).

Additional information to report

This section sets out contextual information pertinent to the initial consultation period.

Access improvement works within Poole Park

Between early May 2020 and 25 July 2020, the road in Poole Park was closed at the Seldown entrance. Further information can be found on the Poole Park Access Improvement updates published on [week 14](#) and [week 16](#).

From 13 October 2020 until 25 November 2020 Whitecliff Road between the Poole Park and Twemlow Avenue junctions was closed to install new kerbs and surfaces. Further information can be found on the Poole Park Access Improvement updates published on [week 30](#) and [week 32](#).

During December 2020 final works were undertaken and involved:

- installing remaining street furniture (bollards, cycle stands, and lighting columns)
- planting new trees
- maintenance of existing trees
- resurfacing at the East Gate Entrance which required a temporary road closure, meaning traffic could not enter the park from this point.

More information can be found on the Poole Park Access Improvement news updates published in [December 2020](#).

Miscommunication during October and November 2020

Unfortunately, it would appear that some confusion transpired at this time. Information regarding the access improvement works in Poole Park was misinterpreted by some as relating to ETRO/2. Leaflets issued by BH Active Travel also seemed to be misinformed.

At the time, Whitecliff Road between the Poole Park and Twemlow Avenue junctions (the section which separates the Boating Lake from the Duck Pond) was closed to motorised vehicles for the installation of new kerbs and surfaces. This commenced on 13 October 2020 and the re-opening was subsequently delayed on two separate occasions to 21 November 2020 and then 25 November 2020. Additionally, for a period there was no vehicle access on Whitecliff Road to the south-eastern end of the park near to Keyhole Bridge. This was to allow for the breaking out of existing speed ramps and construction of new kerbs across the road. Further information about these works has been provided in the preceding paragraphs.

Conclusions

Statistical analysis

Statistical analysis shows that of those who chose to provide formal representation:

- approximately 50% supported the scheme
- messages of support were double the number of objections.

Over the course of the initial consultation period, the data suggests that:

- people were more likely to object at the start or end of the initial consultation
- support was concentrated between the review announcement and publication of the draft decision.

Thematic analysis

The top three themes mentioned by respondents are listed numerically in **Table 4** below. Common themes relate to:

- amenity
- cyclist behaviour
- displaced traffic
- need for the scheme
- rat-running
- road safety
- consultation process.

Respondents also suggested some improvements to the scheme in the form of alternative or complementary measures. The top three for each are listed numerically in **Table 5** below.

Popular suggestions included:

- addressing flooding
- altering the arrangement at the closure point
- camera enforcement
- closing the middle of Poole Park
- improving signage
- segregated cycle infrastructure.

Additional information to report

Access improvement works took place in Poole Park simultaneously to the initial consultation period. This appeared to create some confusion regarding which road was closed and when roads would re-open.

Table 4 – Summary results from thematic analysis

Main Theme		Sub-Theme		Sub-Item	
Description	Mentioned by	Description	Mentioned by	Description	Mentioned by
Advantages of closing Keyhole Bridge to motorised vehicles	211	Improves road safety	100		
		Stops motor traffic rat-running through Poole Park	91		
		Enhanced amenity / placemaking for cyclists and pedestrians	85		
Consultation process	186	Reaction to the draft decision published on 15 January 2021 and / or the final decision published on 28 January 2021	98	Oppose	49
		BCP Council news article dated 15 October 2020 indicating that the bridge would be re-opened to coincide with the completion of road resurfacing in Poole Park	82	Support	49
				Disagree with review	73
		Trial should continue for the full 6-months before any decision is made	16	Agree with review	9
Disadvantages of closing Keyhole Bridge to motorised vehicles	62	Displaced traffic onto surrounding roads	46	Orchard Avenue / Twemlow Avenue	28
				Congestion	22
				Sandbanks Road	19
		Unnecessary	43	No issues with the previous arrangement before ETRO/2	39
				Narrow carriageway and lack of visibility act as a self-enforcing traffic calming feature	9
Cyclist behaviour at the closure point	14	There is an existing traffic free route via the subway linking Park Lake Road with Newfoundland Drive	6		
		Speeds	13		
		Not giving way to / near misses with pedestrians	10		

Table 5 – Summary of suggestions made by respondents

Main Theme		Sub-Theme		Sub-Item	
Description	Mentioned by	Description	Mentioned by	Description	Mentioned by
Complementary measures	45	Upgrade drainage at the bridge to minimise water accumulation	15		
		Additional planters / revised arrangement at the closure point to slow down cyclists	13		
		Cameras to enforce motorcycle compliance	6		
Alternative measures	26	Closing the road within Poole Park to motorised vehicles	14		
		Improved signage at the bridge	6		
		Segregated cycle infrastructure	5		

Appendix A – Classification criteria

A broad range of views have been submitted in regard to ETRO/2. The majority of formal correspondence received was unequivocal. However, some responses were noncommittal or mixed with an element of subjectivity.

Owing to the nature of interpretation and its inherent subjectivity, there was the possibility that some messages could have been incorrectly classified. To counteract this, the control measure in place was to send out an acknowledgement confirming how correspondence has been categorised. If a respondent disagreed or felt their feedback had been wrongly interpreted, they were able to reply and retrospective alterations to the classification were made accordingly. The purpose of this was to ensure that views were not misrepresented. Additionally, it allowed for respondents to change their mind if they choose to.

Each message was reviewed on a case-by-case basis to determine its standpoint. Words, phrases and language used was assessed in their broader context rather than in isolation, to ensure feedback was fully considered and nuances accounted for. All messages received were considered in the consultation reporting process regardless of their classification.

Messages were categorised as one of five types:

- objection – messages which contain the word ‘object’, suffix variants of this, or words similar to ‘object’ like ‘against’, ‘disagree’, ‘negative’, or ‘wrong’.
- neutral comment:
 - equivocal messages without an obvious slant, neither objecting nor supporting
 - for example, a response may praise part of the scheme but criticise its method of implementation or another aspect
 - likewise, some of the language used may mean that a response neither supports nor objects to the scheme
 - purpose is to avoid misrepresenting a person who has not elicited a definitive view.
- message of support – correspondence contains the word ‘support’, suffix variants of this, or words similar to ‘support’ like ‘happy’, ‘positive’ or ‘good’.
- follow up message:
 - used to signify that a respondent has communicated on more than one occasion
 - includes correspondence from the same person via continuous or separate email chains or through the use of different email accounts
 - this approach avoids double counting the views of those who respond on more than one occasion but still captures any additional correspondence that takes place.
- query – messages that merely pose a question or requests further information.