

# Formal objection to TRO 26-052A – Royal Victoria Park cycle lane

On behalf of **Walk Ride Bath (NES)**, we wish to make a formal objection to **TRO 26-052A – Royal Victoria Park cycle lane**.

Walk Ride Bath strongly supports the provision of high-quality walking, wheeling and cycling infrastructure. This objection is specifically concerned with whether the cycle lane proposed through Royal Victoria Park is appropriate to implement in its advertised form. We are not asking through this TRO process for the wider Weston–Bath route to be redesigned.

Our principal concern is **personal security and the associated equality impact**, particularly on women and girls.

## The nature of the proposed route

We recognise that the revised scheme includes new lighting through Royal Victoria Park. The Council states that this is intended to support “**safety and year-round use**”.

Our objection is therefore not that the proposed route will be unlit.

The concern is that lighting does not address all of the personal-security characteristics of the location.

The proposed route begins at the junction of **Weston Road and Park Lane**, runs south through Royal Victoria Park broadly parallel to **Park Lane**, and then turns east through the park broadly parallel to **Upper Bristol Road**.

Although those roads are nearby, the cycle route itself is within an enclosed and heavily tree-lined park. It is physically separated from the surrounding highway environment by fencing, vegetation and the layout of the park, and has limited direct overlooking from adjoining buildings or surrounding activity.

The relevant issue is therefore not simply the geographical proximity of Park Lane or Upper Bristol Road, but whether those roads provide any meaningful natural surveillance of the proposed cycle route, particularly after dark.

This is a material issue for infrastructure intended to provide an everyday transport connection throughout the year.

## LTN 1/20 specifically identifies this problem

The Department for Transport's **Cycle Infrastructure Design – LTN 1/20** applies not only to highways but expressly to cycle facilities on other rights of way and “**routes within public open space**”: paragraph 1.3.1.

More importantly, **paragraph 15.3.2** directly addresses routes through quiet parks.

LTN 1/20 states:

“Cycle routes across large quiet parks or along canal towpaths may not be well used ... after dark, even if lighting is provided.”

It goes on to say that in such circumstances a suitable street-lit on-road alternative matching the desire line as closely as possible should be considered.

This is important because national cycle-infrastructure guidance expressly recognises that **providing lighting does not necessarily resolve the usability or personal-security problem associated with a route through a quiet park after dark.**

We are not asking the Council through this TRO to design or implement an alternative route. The relevance of paragraph 15.3.2 is that it raises a direct question as to whether this particular park route is suitable to perform the year-round transport function for which the Council is implementing it.

The Council's own description of the scheme says that the additional lighting is intended to support year-round use. We therefore ask what assessment has been undertaken against **LTN 1/20 paragraph 15.3.2**, and what evidence has led the Council to conclude that the circumstances identified by that paragraph do not present a significant problem here.

## Natural surveillance

Active Travel England's current design guidance distinguishes clearly between **lighting** and **natural surveillance**.

ATE states:

“The routes must feel safe in order to be well used.”

Its Natural Surveillance guidance explains that this involves designing places so that people can see into and out of an area. It identifies narrow or hidden areas, limited entrances and exits, boundary features and vegetation as relevant design considerations.

ATE advises that active-travel corridors should have surrounding activity so that people feel safe and secure. It also recommends avoiding hiding places, providing frequent entry and exit points, maintaining clear sightlines and ensuring that planting does not undermine surveillance.

ATE's **Route Check Tool** assesses personal security through specific measures including:

- **SP04 – surveillance and activity**
- **SP05 – forward visibility and escape routes**
- **SP06 – visibility of others**

These are separate considerations from whether a route is illuminated.

They appear particularly relevant to this proposal because the route is enclosed within the park, separated from the adjoining Park Lane and Upper Bristol Road corridors by fencing, vegetation and the physical layout of the park, and has limited direct overlooking.

We therefore ask whether the proposed route has been assessed against **SP04, SP05 and SP06**, and, if so, for the results of that assessment to be identified as part of the response to this objection.

## Active Travel England guidance on lighting

ATE's current Lighting guidance reinforces the point made in LTN 1/20.

It states that routes should be thoroughly and consistently lit and specifically says:

“Lighting should not be obstructed by trees or other vegetation.”

ATE also warns against dark places and shadows and says that reflection, glare, shadows and substantial variations in illumination should be considered.

Most significantly, ATE repeats the principle contained in LTN 1/20:

“Even when lighting is provided, some routes may not be well used after dark.”

ATE says that where this occurs, a suitable street-lit on-road alternative matching the desire line as closely as possible should be identified.

Again, we are not asking for an alternative alignment to be determined through this TRO. We are asking how this guidance was applied when deciding that additional lighting adequately addresses the personal-security characteristics of this particular route.

## B&NES's own adopted design guidance

The Council's **Transport and Development SPD 2023** also contains a clear statement under **Safety and Security – Personal Security**.

It says that the risk of crime on more remote routes should be minimised through measures including removal of hiding places, frequent access points, lighting and:

“passive surveillance from overlooking buildings and other users.”

It goes on to state:

“Routes must both be safe, and feel safe”

if they are to be inclusive and support cycling for all.

We recognise that the Transport and Development SPD principally provides guidance for development proposals rather than constituting the statutory test for this TRO. Nevertheless, it demonstrates that the Council's own adopted design guidance recognises that **lighting is only one component of personal security**, alongside passive surveillance, access and the removal of hiding places.

Those characteristics need to be considered in combination.

## Evidence relating specifically to women and girls

There is substantial and very recent evidence that this issue has a differential effect according to sex.

On **25 March 2026**, Active Travel England and the Department for Transport published results of YouGov research into women and girls' safety when walking.

The survey of 2,125 UK adults found that:

- **88% of women surveyed had felt unsafe walking alone after dark;**
- **71% of women had changed their route to avoid walking in darkness during winter or darker months;**
- **57% of women had used another form of transport, such as a taxi or being picked up, because of safety concerns;**
- among women aged 18–24, **36% said personal-safety concerns were preventing them from walking more locally.**

The research also found that 60% of respondents disagreed that women and girls have as much freedom as men and boys to walk wherever and whenever they choose.

This is directly relevant to infrastructure intended to provide an everyday active-travel route through an enclosed park environment.

The Government's announcement accompanying that research specifically identifies **improved visibility and established routes along roads that are busy and overlooked by other people and CCTV** as characteristics relevant to women's perception of safety.

The issue here is therefore not whether Park Lane and Upper Bristol Road are nearby, but whether activity on those roads meaningfully overlooks the cycle route itself.

The relevant question is not whether everyone is legally able to use the route after dark, but whether its physical characteristics create a material differential barrier to its practical use by women and girls.

## Public Sector Equality Duty

**Section 149 of the Equality Act 2010** places the Council under the Public Sector Equality Duty when exercising its functions.

The Council must have due regard to the need to:

- eliminate discrimination, harassment, victimisation and other prohibited conduct;
- advance equality of opportunity between people who share a protected characteristic and those who do not; and
- foster good relations.

**Sex is a protected characteristic.**

Government guidance on the PSED asks decision-makers to identify whether impacts are unequal, including whether:

“the decision help[s] or hurt[s] people with one protected characteristic more than it would people with another”

and, where impacts are unequal, to consider prevention, mitigation or balancing measures.

The guidance also states that:

“The decision-maker must give real consideration to the duty”

and that the duty must be exercised rigorously and with an open mind.

This is directly relevant given the evidence that concerns about personal security after dark have a significantly different effect on the travel behaviour of women.

## Equality Impact Assessment

Walk Ride Bath (NES) therefore asks the Council to identify the **Equality Impact Assessment (EqIA), or other documented assessment of equality impacts**, which will be placed before the decision-maker when determining whether TRO 26-052A should be made.

We recognise that the Equality Act does not require the Council to produce a document specifically entitled an “Equality Impact Assessment”.

What is required is for the decision-maker to have due regard to the statutory equality considerations when taking the decision, with sufficient information to understand the potential impacts.

We therefore ask the Council to confirm whether its equality assessment specifically considers:

1. **Sex as a protected characteristic**, and the differential impact of the proposed route on women and girls.
2. The current evidence concerning women's perceptions of personal security during hours of darkness, including the March 2026 ATE/YouGov research.
3. The fact that the proposed route is within an enclosed and heavily tree-lined park.
4. The physical separation of the route from **Park Lane and Upper Bristol Road**, including fencing, vegetation and the layout of the park.
5. Whether activity on Park Lane and Upper Bristol Road provides meaningful natural surveillance of the cycle route itself.
6. The limited direct overlooking from adjoining homes, businesses or other occupied buildings.
7. Expected levels of human activity and natural surveillance during winter evenings and other hours of darkness.
8. Forward visibility and opportunities for users to leave the route if they feel threatened or uncomfortable.

9. The interaction between mature vegetation and the effectiveness and consistency of the proposed lighting.
10. **LTN 1/20 paragraph 15.3.2**, which specifically recognises that cycle routes through large quiet parks may not be well used after dark even where lighting is provided.
11. Active Travel England's current Natural Surveillance and Lighting guidance.
12. ATE Route Check Tool personal-security measures **SP04, SP05 and SP06**.
13. Whether the proposed lighting actually mitigates the identified equality impact sufficiently, rather than simply providing technical illumination of the route.
14. Whether any residual differential impact remains once the proposed mitigation has been taken into account.

If an EqIA or equivalent assessment addressing these matters has already been undertaken, we ask that the Council identifies it and provides a copy or link to it.

If these matters have **not** been considered, we ask that they are assessed and placed before the decision-maker before a decision is taken to make TRO 26-052A.

## Basis of our objection

Our objection is not that Royal Victoria Park is inherently unsafe, nor that lighting has no benefit.

It is that the proposed route has a combination of characteristics specifically recognised in national and Council guidance as relevant to personal security:

- a route through a quiet park;
- enclosure within the park;
- limited direct overlooking;
- physical separation from surrounding road activity;
- mature vegetation;
- constrained natural surveillance; and
- substantially lower surrounding activity during hours of darkness.

Lighting addresses only part of that issue.

LTN 1/20 expressly recognises that park routes may remain poorly used after dark **even when lighting is provided**, and current ATE evidence demonstrates that concerns about personal security after dark have a particularly significant effect on women.

Given that the purpose of the scheme is to create an inclusive and year-round transport connection, we believe these matters need to be properly assessed before the Council determines whether this Order should be made.

Unless the Council can demonstrate that the personal-security and associated equality impacts have been adequately assessed and satisfactorily mitigated, **Walk Ride Bath (NES) objects to TRO 26-052A being made in its present form.**

## References

### **Bath & North East Somerset Council – Weston to Bath city centre / Royal Victoria Park proposals**

Scheme details and proposed lighting:

<https://www.bathnes.gov.uk/weston-bath-city-centre>

### **Department for Transport – Cycle Infrastructure Design, LTN 1/20**

See paragraph 1.3.1 on routes within public open space and particularly paragraph 15.3.2 concerning routes through large quiet parks after dark.

<https://www.gov.uk/government/publications/cycle-infrastructure-design-ltn-120>

Direct PDF:

<https://assets.publishing.service.gov.uk/media/5ffa1f96d3bf7f65d9e35825/cycle-infrastructure-design-ltn-1-20.pdf>

### **Active Travel England – Natural Surveillance**

Guidance on surrounding activity, sightlines, hiding places, entry/exit points and Route Check Tool measures SP04–SP06.

<https://www.activetravelengland.gov.uk/planning-active-places/natural-surveillance>

### **Active Travel England – Lighting**

Guidance on vegetation, shadows, consistency of lighting and routes that may remain poorly used after dark despite lighting.

<https://www.activetravelengland.gov.uk/planning-active-places/lighting>

### **Active Travel England / Department for Transport – Women and girls' safety research, 25 March 2026**

<https://www.activetravelengland.gov.uk/news/nationwide-plans-announced-design-safer-streets-9-10-women-report-feeling-unsafe-walking-night>

Government publication:

<https://www.gov.uk/government/news/nationwide-plans-announced-to-design-safer-streets-as-9-in-10-women-report-feeling-unsafe-walking-at-night>

**B&NES – Transport and Development SPD 2023**

See Safety and Security / Personal Security guidance concerning remote routes, hiding places, access points, lighting and passive surveillance.

<https://www.bathnes.gov.uk/policy-and-documents-library/transport-and-development-spd>

**Equality Act 2010 – Section 149, Public Sector Equality Duty**

<https://www.legislation.gov.uk/ukpga/2010/15/section/149>

**UK Government – Public Sector Equality Duty guidance for public authorities**

<https://www.gov.uk/government/publications/public-sector-equality-duty-guidance-for-public-authorities/public-sector-equality-duty-guidance-for-public-authorities>

**Equality and Human Rights Commission – Technical Guidance on the Public Sector Equality Duty: England**

<https://www.equalityhumanrights.com/guidance/public-sector/public-sector-equality-duty/technical-guidance-public-sector-equality-duty-0>