

## Response to Consultation

### Bristol Cycling Campaign

July 2017

## Callowhill Court – Planning Application



Ref: [16/06594/P](#)

Our position on this planning application is: **OBJECT**

Bristol Cycling Campaign believes that everyone deserves safe, attractive space for cycling on all Bristol's streets. We welcome the target in the council's [Bristol Cycle Strategy](#) for 20% of trips to work by bike by 2020. **We are concerned that the proposals in this consultation will discourage cycling.**

Our general assessment of the proposals on this consultation drawing is that they:

1. Further hinder access to the shopping area by cycle. A major through route is closed to cyclists and cycle parking provided only at the periphery rather than within the area development.
2. Do not provide protected cycling space on main roads, or remove through motor traffic.
3. Make cycling more dangerous for cyclists and other vulnerable road users, with poor design features.
4. Hinder the development of Bristol Council's proposed strategic cycle network
5. Demonstrate a general lack of competence in cycle facility and urban environment design. There is also insufficient attention to detail resulting in omissions and puzzling features.

We are particularly concerned by the closure of Horsefair to cycling, the disconnected cycle routes in a number of places and dangerous cycle lane designs near bus stops. Horsefair is the natural through and access route for cycles and cannot be replaced by a poorly designed pavement cycle path on Bond Street. The proposal to do so shows a lack of understanding of the design principles for car free public spaces with free cycle and foot access, as is normal on the continent.

The proposal to provide cycle parking at the periphery is part of this lack of understanding. Short term shopper cycle parking needs to be distributed among the shops.

**Consequently, Bristol Cycling Campaign objects to the proposals.**

## Detailed Comments relating to planning policy

Bristol Cycling Campaign has the following specific comments on the revised proposals, in addition to those raised in our January 2017 response:

The development is **bad for cycling and contravenes local plan policy** in the following respects:

### **1. Reduced permeability to cycling**

This is contrary to objectives of **DfT's Manual For Streets (referenced in Core Strategy)**, key issues include:

- (a) Horsefair – Disconnected cycle paths – shared pavements – no cycle access
- (b) Disconnection between southbound cycle path on York Street and Bond St eastbound for no obvious reason or benefit to anyone
- (c) Shared pavement for cycles in Horsefair to Bond St, causing pedestrian-cycle conflict in an area which would be expected to have high footfall and where there is space to provide a contraflow track
- (d) No eastbound provision for cycles to travel contraflow on Horsefair, resulting in more journeys by bike needing to be made on busier roads.
- (e) No westbound provision for cycles on Horsefair, resulting in more journeys by bike needing to be made on busier roads.
- (f) Pedestrian crossing at the eastern end of Horsefair near Primark appears to have been removed.
- (g) Union Street – disconnected lanes – missed contraflow opportunity – bus stop conflict
- (h) Opportunity to provide a segregated southbound contraflow cycle lane at southern end of Union Street has been missed
- (i) Disconnection between northbound cycle lane on Union Street and westbound lane on Broadmead, meaning cycles need to dismount for approximately 20 metres.
- (j) Unclear whether northbound cycle lane on Union Street is physically segregated – this will be essential to avoid buses swinging into path of cycles when departing the stops.
- (k) Unclear whether existing pelican crossings on Wine St/Newgate/Union Street are being retained, removed or added to.
- (l) No indication whether cycle parking outside Cabot Circus near Castlemead is being removed to accommodate the new bus lane

## **2. Heritage Assets -Policy BCS22 – Conservation Area at risk**

Development should safeguard and enhance heritage assets including historic parks and gardens – this development will route traffic to the car park through the historic Portland and Brunswick Squares Conservation Area, resulting in increased traffic, noise, severance and pollution.

## **3. Core Strategy policy BCS13 – Climate Change – Non-compliant Travel Plan**

- (a) Development should mitigate climate change by encouraging [sustainable] journeys rather than car – this site is in one of the most accessible within Bristol but the development is designed to encourage a majority of trips by car, without attempt to change existing conditions.
- (b) No specific change to the baseline conditions towards more sustainable modes is proposed within the framework travel plan, which contains no targets, contrary to the **DfT Guide on Travel Plans for Developers**.

## **4. Pedestrian Crossings**

No signalised pedestrian crossing across the mouth of the car park entrances (Dwg #0775-031) – contrary to Development Management Policy **DM23** and the hierarchy within Core Strategy policy **BCS10**

## **5. Car Parking Proposals – non compliant assessment – flawed need assessment – fetter required draft local air quality plan**

- a. Parking assessment does not appear to be in compliance with national / local plan requirements which should take account of existing parking on the area of Broadmead to be demolished;
- b. Large-scale new car park proposals will fetter the Council's likely requirement to produce a draft local air quality plan to DEFRA/DfT
- c. Developers have not demonstrated evidence of need for parking, for example by assessing capacity/performance of existing car parks eg Cabot Circus, Galleries
- d. No evidence that developers have considered parking alternatives with reduced impact, eg expansion of existing car parks in the area;
- e. Car parking land should instead be used to increase the % of site for housing (including affordable);

## CONTACT:

Bristol Cycling Campaign  
[info@bristolcyclingcampaign.org.uk](mailto:info@bristolcyclingcampaign.org.uk)  
<http://bristolcyclingcampaign.org.uk>

## References

### 1. [Bristol Cycling Campaign \(BCyC\)](#)

We been campaigning since 1991 to **make cycling in Bristol so easy that everyone does it**. We produced the [Bristol Cycling Manifesto](#) in 2013 which has now been signed by over 4,000 people. This sets out a **12 year strategy to quadruple cycling in the city which was endorsed by the Mayor of Bristol** and has influenced the Bristol Cycling Strategy.

### 2. **Lots of people ride bikes in Bristol**

The 2011 census showed that **cycling to work in Bristol had doubled over the past 10 years** and that Bristol had significantly more cycling than any other major English city. This is **despite the absence of any effective use of the various cycle budgets** obtained from central government such as the 'Cycling City' programme. The potential for cycling to work would **obviously be greater if** budgets were used effectively and good design implemented so that **cycling to work became obviously easy and attractive**. On census day in 2011 16,211 Bristolians said that they usually cycled to work. (1 in 12 of the 104,729 who travelled to work at that time). A telephone survey for HM Government indicated that in 2012 nearly a quarter of adult Bristolians cycled at least once a month for one reason or another. Bristol City Council data collected by observers between 2010 and 2013 show that at peak times there were over 10,000 cyclists on Bristol roads and 7% of all city traffic measured at these times were cyclists. Across the city, some routes carry 300-500 cyclists per hour and at four busy points on roads into the city cyclists already constitute over a quarter of all traffic during peak hours. <http://samsaundersbristol.wordpress.com/2013/02/12/considerate-cycling-27-bristol-compared/>

### 3. **Improving and extending the Bristol cycle network is a council priority**

Bristol City Council's [Cycle Strategy](#) and the [Bike Life 2015](#) report show how cycling benefits the city and set targets of 20% for commuting and trips to school. These incorporate the cycle network set out in our [Bristol Cycling Manifesto](#). All measures on these routes must include a high level of cycle provision, or at the least 'cycle proofing' for the future.

### 4. **Cycling is a national priority**

The Times newspaper 'Cities Fit for Cycling' campaign supported a parliamentary inquiry by the All Party Parliamentary Cycling Group, prepared by Professor Phil Goodwin of UWE. In his forward he says: "I, like most professional transport planners, providers and researchers of my generation, have grown up thinking that cycling, though worthy, is of small significance compared with the great questions of cars, traffic and public transport, or the universal significance of walking. [...] We were wrong. The evidence demonstrates quite clearly that [...] cycling is the mode of transport 'on the cusp of greatness'".  
[http://allpartycycling.files.wordpress.com/2013/04/get-britain-cycling\\_goodwin-report.pdf](http://allpartycycling.files.wordpress.com/2013/04/get-britain-cycling_goodwin-report.pdf)

### 5. **More cycling is a health priority**

Recently published guidelines by the National Institute of Clinical Excellence have set out how local authorities must invest in walking and cycling. The government's chief medical officer, Dame Sally Davies said: "I think that investment in cycling to drive up physical activity might emerge as one of the 'best buys' in some areas."  
<http://publications.nice.org.uk/walking-and-cycling-local-measures-to-promote-walking-and-cycling-as-forms-of-travel-or-recreation-ph41/recommendations>