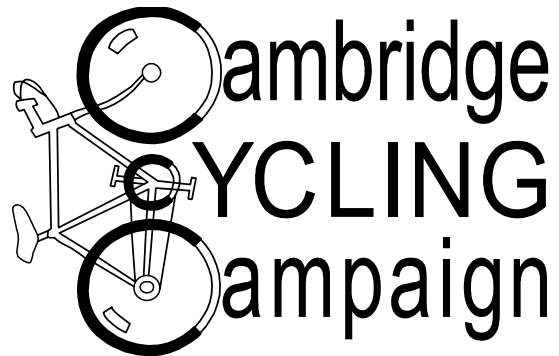


July 23rd 2004

Our ref: PO4 002
Your ref:

Toby Williams
Environment & Planning Department
Cambridge City Council
The Guildhall 2nd Floor
Cambridge
CB2 3QJ



Cambridge Cycling Campaign

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Dear Mr Williams,

**Formal objection to Planning Application No: C/04/0632/FP
for the development of Bradwell's Court, Cambridge**

"To further increase the level of cycling in Cambridge, cyclists will not only need additional cycle routes across the City, complementing the existing cycle network, but will also need high quality cycle parking facilities." (Page 9, Cambridge City Council Supplementary Planning Guidance, Car and Cycle Parking Standards adopted 27th May 2003; also www.cambridge.gov.uk/planning/reptdocs/Parking_Standards.pdf). The present objection to the planning application for Bradwell's Court is based on the need to satisfy these laudable City Council policy objectives.

1. Cycle Parking

The requirements of the City's Cycle Parking Standards of May 2003 as they relate to Bradwell's Court are clear and straightforward (Reference above, pages 9 and 10):

- a) Cycle parking should be on-site.
- b) It should be located "near the main entrance".
- c) It should "provide good support for the cycle and provide a convenient place to lock the frame of the cycle to the parking stand."
- d) It should "minimise conflicts between cycles and cars."
- e) For the residential component of the development one space should be provided for each one-bedroom flat and two spaces for each two-bedroom flat.
- f) For the non-food retail component (A1) one space per 25 sq.m GFA should be provided.
- g) For the food and drink (A3) area one space per 10 sq.m of dining area should be provided.

These are set out as the City Council's "minimum requirements" for all new developments. They are not mere target figures to be achieved when convenient. Quite rightly in our view, there is no provision for adjustments, compromises or alternative arrangements.

Does the present planning application meet the City's requirements? As far as the residential accommodation is concerned, the number of cycle parking spaces does

appear to be correct though access by lift may be difficult unless the lifts and lift lobbies are designed to carry cycles without inconveniencing other passengers. As far as provision for retail (A1) and restaurant (A3) areas is concerned, the number of on-site cycle spaces is a tiny fraction of the requirement and the small amount that is to be provided (only for those employed within the development) is located in a relatively inaccessible area far from any main entrance. Access will be via a gate from Drummer Street bus station - an area where conflict between cycles and motor vehicles is more than likely.

We call upon the City Council to uphold and implement its own Cycle Parking Standards in this important City Centre development. The following considerations are relevant:

i) Off-site cycle parking is not an option. All available nearby sites are urgently needed by other users including bus station employees and passengers, other local employees, shoppers and visitors using nearby developments built before the Cycle Parking Standards came into operation in 1996. At present pressure on cycle parking in this area is as great or greater than anywhere else in Cambridge.

ii) Other new City Centre developments, including the Grand Arcade, are providing large areas of on-site cycle parking. To permit the developers of Bradwell's Court to provide so much less would be discriminatory.

iii) Currently Bradwell's Court has a long loading bay, an underground car park with some ten vehicle spaces and a small number of additional above-ground car spaces all accessed via an entrance in Drummer Street bus station. The development's loading bay area (to be split into two) is to be retained but all the car parking spaces are to be surrendered in accordance with the City's policy of requiring City Centre access to be primarily by "public transport, cycling and walking." The increment in space to be available for development by the release of the car parking areas plus the huge general increase in floor area by building more floors over a larger footprint should not, we believe, all be made available to the developer for profitable purposes. 7,855 sq.m GEA of retail plus 15 flats are to replace 4,755 sq.m GEA of retail. As the Cycle Parking Standards require, part (in this case part of the very large increment in floor area) should be made available to the public for the cycle parking generated by the development itself. It is unreasonable to expect this to be provided off-site.

2. Proposed extension of the development into part of the open space area along the St Andrew's Street frontage.

We wish to object to the proposed extension of the building into part of the current area of open space along the St Andrew's Street frontage. Open space reduction in this congested area is unacceptable. The developers propose to keep the same number of cycle spaces in the reduced area as are there at present but the proposed location of some of these spaces is wholly unsatisfactory. In particular those next to the road will obstruct pedestrians and cyclists who need space to keep out of the way of on-coming buses and other large vehicles.

3. Re-opening of Christ's Lane as a Pedestrian and Cycle Thoroughfare

We strongly support the proposal to reopen Christ's Lane which, until about 1960, was a very attractive pedestrian and cycle thoroughfare linking St Andrew's Street with Drummer Street. The application proposes that the lane should be reopened as a pedestrian way six metres wide but makes no provision for reopening it for cycling. It seems to us entirely wrong, given present Council policies encouraging cycling, that the regrettable 1960s policies of restricting cycle routes should be continued into the much more cycle-friendly twenty-first century. We ask that, as part of the plans for the reopened lane, a segregated cycleway should be constructed alongside the college wall and that the lane should be widened to significantly more than the proposed six metres. Putting the cycleway alongside the wall would minimise conflict with pedestrians. The

only significant potential conflict would be with deliveries to Christ's College. However, we understand that the lane would be closed to vehicles by bollards and that deliveries would be by trolley and almost all before 10am, removing the likelihood of difficulty. It is important to recognize that if cyclists are expected to dismount and if law-abiding cyclists do so and wheel their bicycles through the lane, this will significantly increase the congestion. A cyclist wheeling a cycle takes up twice as much space for at least twice as long as a mounted cyclist. Congestion caused by a given number of cyclists would, using this rough-and-ready calculation, be four times greater than if cyclists are permitted to cycle through.

Segregation of cyclists from pedestrians would be improved if the cycleway were to be differently paved, at a lower level than the pedestrian area and at least 2.6 metres wide (the same width as that of the Carter cycle bridge over the railway).

4. Creation of a New Cycleway around Christ's Pieces

We propose that as part of the Section 106 requirements for the development of the site, a new cycleway should be constructed linking St Andrew's Street to Northern and Eastern Cambridge.

The first part of the cycleway would be the proposed segregated cycleway alongside the college wall in Christ's Lane. It would continue along the path along the side of Christ's Pieces (Milton's Walk). This path is not heavily used by pedestrians and is sufficiently wide to permit the construction of a segregated cycleway as far as the rear of the buildings bordering King Street. At this point the way through to King Street becomes too narrow for cycling and we suggest that instead the cycleway should here continue to the right as a shared-use path behind the King Street buildings along the edge of Christ's Pieces as far as Short Street. To make the path suitable for cycling it would be important to negotiate the removal of the unsightly dustbins which at present obstruct the path and, if possible, to widen the path by setting back the fence which separates it from Christ's Pieces. Moving the fence in this area (which lies behind the tennis courts) would not in our opinion constitute any significant loss of amenity. The visual impact would be negligible.

It is important to stress that both Milton's Walk and this path are quite separate from the diagonal pedestrian paths linking the City Centre to New Square and the Grafton Centre. We believe that pedestrians should retain exclusive use of these diagonal paths and the other paths which cross Christ's Pieces. The provision of an alternative cycle route should reduce illegal cycling along the crowded diagonal paths.

The need for a cycleway along Christ's Lane and continuing around the edge of Christ's Pieces will be greatly increased if the proposals, currently under consultation, for Stage 4 of the Cambridge Core Traffic Scheme are implemented. According to the consultation document the Drummer Street-Emmanuel Street area "is already an extremely busy area and is set to get busier. Currently over 130 buses leave the central hub each hour. This is expected to grow to over 180 an hour by 2011." "A key aspect of these measures" [the Stage 4 proposals] "is to introduce a westbound one-way system in Emmanuel Street with a contra-flow cycle facility." There would be possible disabled parking "or a new taxi rank on the north side of Emmanuel Street." What this means is that contraflow cycling would probably be accommodated in a red contraflow lane sandwiched between on-coming buses and on-coming taxis or disabled drivers using the taxi rank or disabled parking spaces. Alternatively contraflow cycling might be permitted with no lane. Given the increased number of buses, either arrangement would be intimidating for less confident and less experienced cyclists. Even wheeling a cycle through on either of the pavements could be difficult at peak times in an area so congested with bus passengers, possible taxi queues and other pedestrians including the disabled. This is what makes the alternative route we propose so important if the Council's aim to encourage cycling in Cambridge is to be achieved.

What this proposed new route would offer is an extremely attractive peaceful ride

through parkland and over commons from the city centre out to Northern and Eastern Cambridge. The route would connect neatly via New Square and Fair Street with cycle routes over Midsummer Common and with the Jubilee Way. It would also give the best possible way from the City Centre to the new pedestrian and cycle bridge to be constructed at Riverside. We attach a copy of a letter from Sustrans supporting our proposal.

Yours sincerely,
on behalf of Cambridge Cycling Campaign,

James Woodburn