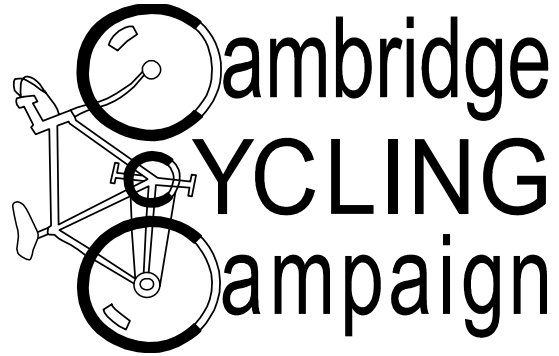


December 8 2005

Our ref: P06 001  
Your ref:

Neville Doe  
Planning Department  
Cambridge City Council  
The Guildhall  
Cambridge  
CB2 3QJ



**Cambridge Cycling Campaign**

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Dear Mr Doe,

**FORMAL OBJECTION BY CAMBRIDGE CYCLING CAMPAIGN TO THE PLANNING APPLICATION FOR THE REDEVELOPMENT OF THE BETJEMAN HOUSE SITE ADJOINING THE HILLS ROAD/STATION ROAD JUNCTION IN CAMBRIDGE AND TO THE PROPOSED INTERLINKED REDESIGN OF THE ROAD JUNCTION.**

Introduction

I am writing on behalf of Cambridge Cycling Campaign to formally object to this Planning Application on the grounds that it makes inappropriate and insufficient provision for cyclists and cycling. Objecting to this application is particularly difficult because the on-site development is intricately linked with the relocation of the War Memorial from the centre of the road junction adjacent to the site to a new public square just north of the development and with the consequent remodelling of the junction and the roads leading into it using designs prepared by the developers. The Betjeman House site plans cannot be assessed without at the same time examining in detail the options for the road junction submitted with the present Planning Application.

**In summary our objections are:**

- 1. An insufficient floor area is allocated for cycle parking.**
- 2. No outdoor ground-level cycle parking stands close to entrances to buildings are provided for visitors making visits to the offices, retail units, restaurants, public houses and residences planned for the site.**
- 3. Some of the underground cycle parking spaces are wrongly placed. To meet the requirement that they should be conveniently close to destinations they should all be located one floor down, not divided between one floor and two floors down.**
- 4. No evidence is given in the Application that the necessary safe and convenient access by cyclists to the underground cycle parking spaces will be provided.**
- 5. There is no satisfactory assessment of the on-site and off-site routes and other requirements resulting from the cycling trips which will be generated by the development.**

6. **The exceptionally large numbers of cyclists using the cycle routes which pass through the road junction and their space requirements are entirely ignored in the calculations of the capacity of the junction.**
7. **We strongly object to the arbitrary and unjustifiable removal of the length of mandatory cycle lane which runs through the junction and is used by northbound cyclists. This length of lane is removed in both proposed options for the junction.**
8. **The carriageway outside the proposed development is too narrow to accommodate an adequately wide mandatory cycle lane and adequately wide northbound and southbound traffic lanes. THE HILLS ROAD FRONTAGE OF THE PROPOSED DEVELOPMENT NEEDS TO BE SET BACK BY SOME TWO METRES.**
9. **We strongly object to the proposed large on-road island at the exit from the junction for northbound cyclists which would create an oppressive and dangerous pinch point. This island is present in both proposed options for the junction.**
10. **The main access to the site is too narrow and fails to provide a footway to keep pedestrians segregated from cyclists and motor vehicles. More important still, the visibility sight lines for motor vehicles and cyclists entering and leaving the site are unsatisfactory. We are particularly concerned that vehicles leaving the site will endanger cyclists using the mandatory cycle lane which runs past the entrance.**
11. **A more significant proportion of the Section 106 funds arising from this development should be devoted to the off-site requirements of the cyclists living, working and otherwise using this development whose numbers have been seriously underestimated. Stakeholders such as ourselves should be consulted about the allocation of Section 106 funds in this and other instances which have important implications for cycling and cyclists.**

We explain and discuss all of these issues in the material which follows and ask members of the Planning Committee to reject this application unless these matters are satisfactorily resolved.

### Cycle Parking

483 (or 484) cycle parking spaces are to be provided (*Supporting Planning and Design Statement, page 29*). All are located underground, some one floor down, some two floors down in the underground car parks which are to be built beneath the entire site, including all the open space (*Upper and Lower Basement Plans*). The spaces are intended to provide the minimum number of spaces required by the City's Cycle Parking Standards.

272 spaces are for visitors and residents of the 188 residences.

146 spaces are for visitors and employees coming to the offices.

35 spaces are for visitors and employees coming to the restaurant and public house areas.

31 spaces are for visitors and employees coming to the non-food retail areas.

We object to the provision because it fails to conform to the City's Cycle Parking Standards and to acceptable design standards for cyclists in the following respects:

1. The amount of space shown on the floor plans is insufficient to accommodate the specified number of bicycles using the types of stand specified by the Cycle Parking

Standards .(Allowing for gaps between rows, approximately 1½ sq.m. per cycle is needed for Sheffield-style stands correctly set 1m apart.)

2. The location of the cycle parking does not meet the City's requirement in the Cycle Parking Standards that it must be close to the entrances of each of the component buildings of the development. Cyclists making short visits to the offices, retail units, restaurants, public houses and the residences cannot be expected to park their bicycles in an often distant underground car park. Such parking must be above ground and close to all the various main entrances. Given the low ratio of open space, the overall scale of this development may need to be reduced to provide the necessary space.

For cyclists living or working on the site, underground parking may be more acceptable with certain provisos. Firstly to have to go two floors down is unnecessary and unacceptable. Whatever cycle parking is located underground must all be one floor down, not two floors down and must be concentrated immediately adjacent to the bottom of the ramp to avoid conflict with reversing cars. Entrance and egress must be nearby, safe and practicable. It is not clear whether cycle access is designed to be provided by lift. If so, the entrances and exits to the lifts must be designed so that access by cyclists is straightforward and other lift passengers are not inconvenienced. If, on the other hand, access is to be only by ramp, cyclists on the ramps must be segregated from cars and gradients must be suitable for cycling. We are particularly concerned that access by ramp is made safe for child cyclists and elderly cyclists of whom there are likely to be a significant number in the 188 residences.

#### The Implications of the Transport Assessment and the Redesigned Road Junction

We are very concerned about the inadequacies of the transport assessment in relation to cyclists and cycling, both on the Betjeman House site and along the roads of the Station Road / Hills Road junction immediately outside the Betjeman House site. The developers have designed their development to be linked with the removal of the War Memorial to a new public square bordering their site and with the reconstruction of the Hills Road /Station Road junction in front of their site (*Supporting Planning and Design Statement, page 17*). Two alternative options for the design of the junction have been submitted with their Planning Application (*Technical Appendix 8*). We comment on these below and express a strong preference for Option 2.

**However we now make a formal request that these two options should also go through the processes of stakeholder and public consultation and be considered by the Cambridge Traffic Management Area Joint Committee before the Planning Application is approved. The implications of the development for the adjacent roads and junction are considerable and these need a more thorough examination by councillors, stakeholders and the general public than can be provided by the planning process alone.**

#### Provision for On-site Cycle Journeys and for Cycle Journeys through the Reconstructed Road Junction

In Cambridge more than 25% of people cycle to work and an even higher percentage use their bicycles for shopping and recreation. It is extraordinary for the developers to claim that only 3% of the daily trips generated by the proposed office buildings and only 2% of the trips generated by the retail units will be by bicycle (*Environmental Statement Tables 8.7 and 8.8*). It is even more extraordinary to do this while recognising that 25% of the trips generated by the residential units will be by bicycle (*Table 8.6*). The problem derives from

using wholly unsuitable comparative data drawn from other UK cities where cycling rates are a tiny fraction of Cambridge rates (*Technical Appendix 8*). The result is a thoroughly unsatisfactory assessment of the on-site and off-site route and other requirements resulting from the cycling trips generated by the development. (Motor vehicle journeys generated by the development have also been underestimated. For example the additional journeys generated by the increment in public house and restaurant floor area have not been included although these increase the floor area from 267sq.m. to 701sq.m. (*Environmental Statement, page 119*)).

The weaknesses of the traffic assessment of the Hills Road / Station Road junction in relation to cyclists and cycling are much more serious. The assessment rightly states that Hills Road and Station Road are designated cycle routes which connect to the wider cycle network, but entirely fails to acknowledge the significance of the number of cyclists using these routes and the space requirements of these cyclists which have a bearing on the capacity of the junction for motor vehicles. The County Council's surveys demonstrate that in general terms as many people travel to and from the city centre by bicycle as by bus. The routes along Hills Road and Station Road and through the junction considered in this planning application link up with what are probably the two most important cycling destinations outside the city centre – Cambridge Railway Station and Addenbrooke's Hospital. The number of cycle journeys along these routes are among the highest for on-road cycle routes not just in Cambridge but for anywhere in the UK and certainly amount to thousands every day. But the traffic census undertaken on Thursday 28<sup>th</sup> April 2005, the results of which are recorded in Table 8.3 and which are used in assessing the capacity of the Hills Road / Station Road junction, fails even to record the number of cyclists. The clear and wholly unacceptable implication is that the substantial and increasing requirements of cyclists for road space at this junction are inconsequential and can in most respects be ignored. The documents do however state that the reconstruction of the junction will make it possible "to introduce advance cycle stop lines which will benefit road safety" (*Proposal for a Mixed-Use Development, page 17*). The problem with this assertion is that advanced stop lines are not going to be introduced. They cannot be because they are, and have long been, already there in front of all six traffic lanes leading into the junction. The reality is that both options for reconstructing the junction offer no advantages and many disadvantages for cyclists. We welcome the advantages for pedestrians but we believe that these should be combined with appropriate advantages for cyclists.

At present there is a very much valued mandatory cycle lane along Hills Road heading North towards the city centre from Brooklands Avenue and which continues unbroken through the Hills Road / Station Road junction. We are shocked that, according to the drawings of both options for the redesigned junction, a length of this lane is removed. We believe that this mandatory lane, rather than being removed, must be improved when the junction is redesigned to provide adequately for the exceptionally large numbers of cyclists who use it. Outside the Betjeman House site the cycle lane narrows to less than 1.1m within the white line. This is well below the acceptable minimum of 1.5m for a cycle lane carrying such large numbers of cyclists. To make matters worse, the present vehicle lanes at this point are so narrow that when the road is congested most vehicles (and virtually all buses and other wide vehicles) encroach on the cycle lane. The road lanes narrow to only 2.4m within the white lines, a figure which is wholly insufficient.

**To accommodate two northbound traffic lanes of adequate width (above 3m) and a 1.5m mandatory cycle lane, together with a southbound traffic lane (on the other side of the road outside Kett House) wide enough to accommodate both southbound cycles and other southbound traffic because there is no southbound cycle lane at this point, the carriageway will have to be widened. Unless the carriageway is widened, the lane widths for northbound traffic set out in *Technical Appendix 8* could not be accommodated without an unacceptably narrow mandatory cycle lane and a single**

**unacceptably narrow southbound traffic lane for all traffic including numerous buses, HGVs, cars and an exceptional number of cyclists. The proposed buildings for the Betjeman House site need to be set further back by some two metres. The opportunity for improving the junction for existing and future cyclists must not be lost. Widening on the other side of the road (along the Kett House frontage) would be more problematical because large vehicles turning left out of Station Road would have too severe a turn. The widening should be on the Betjeman House side and must cause revision of this Planning Application.**

The principal distinction between Option 1 and Option 2 lies in the issue of whether a new pedestrian crossing across Hills Road should be located on the north side (Option 1) or the south side (Option 2) of the junction. The developers seek to show that, in their view, either Option would be practicable, but they express no preference between them. Cambridge Cycling Campaign strongly opposes Option 1 but would welcome a much modified version of Option 2 which would benefit pedestrians.

### Option 1: Reasons for Our Opposition

A length of northbound mandatory cycle lane running through the junction has been removed (see above).

A pedestrian crossing of Hills Road with a wide island refuge is proposed at the traffic lights at the north side of the junction. The wide island refuge is elongated and, instead of crossing in a straight line, pedestrians would have to make a right-angled turn as they step onto the refuge and another right-angled turn as they leave it. There would be metal guard rails along each side of the refuge to prevent them from going straight across. We presume that they would have to wait and press another button before getting a signal to cross the rest of the road. This wide elongated island would cause problems for on-road cyclists. Firstly, it would narrow the traffic lanes and create dangerous pinch points for cyclists travelling in both directions. The pinch point for north-bound cyclists, cycling towards the city centre, would be particularly difficult. In the design the existing mandatory cycle lane at this point has been removed. Large vehicles – buses and HGVs – emerging from Station Road and turning right into the pinch point with cyclists alongside them would be in danger of knocking over such cyclists when turning because space is so constricted. Secondly, we do not understand the purpose of placing the crossing in this location. It is poorly placed to serve the Betjeman House site development and few people from the site travelling to the station would use it. Most people walking from the station along the side of Station Road who wish to cross Hills Road are able conveniently to do so some 50m further north at the present direct single-stage crossing just before the junction with Bateman Street. Hardly any pedestrians would, we believe, choose to use an awkward indirect two-stage crossing at the location specified in Option 1.

### Option 2: Reasons for Our Qualified Support

According to Option 2, a single-stage crossing of Hills Road would be provided at the traffic lights outside Betjeman House. This would be much more relevant for the various users of the Betjeman House development because this would take them on a more direct route to and from the Station and the new facilities proposed for the Station Area. We see this proposed crossing as a sensible improvement which, unlike Option 1, does not in itself degrade cycle facilities.

However, the drawings for Option 2 show a large island in the same position to the north of the junction as the island refuge in Option 1. This again would create a pinch point for cyclists. It is unnecessary and should not be constructed. As explained above, in this option too the same length of northbound mandatory cycle lane is removed for no justifiable reason.

### Site Access

The main access to the site for pedestrians, cycles and motor vehicles would be through an arch beneath the frontage and close to the reconstructed Flying Pig public house. The only other access is a narrow pedestrian footway further to the north. In our opinion the main access provision is inadequate and we object to it.

In their Design Statement (*Section 2.2*) the developers state:

“The site retains a vehicular/pedestrian shared surface access onto Hills Road with the proposed access being located slightly to the south of its current location. This access serves the basement car park and internal service areas. The site is in an urban location adjacent to one of the main arterial traffic routes into Cambridge where traffic speeds are generally well below the 30mph speed limit. In locations such as this it is generally accepted that standards for visibility sight lines can be relaxed. In this case the visibility sight lines available at the existing access have been retained in the new location.”

This statement is misleading in a number of important respects:

1. This access is not just for motor vehicles and pedestrians as this wording might at first glance suggest. All cyclists including those old and young cyclists who would live in the 188 planned dwellings would have to enter and leave by this route.
2. The present access to the site consists of a brick-paved pedestrian footway 2.02m wide separated by a wide grass verge from the cycle/motor vehicle entrance road which is 5.93m wide – a total access width of 7.95m. The proposed access beneath the frontage would have to carry very much more traffic – pedestrian, cycle and motor vehicle – than the present one, would be much narrower and would not even segregate pedestrians from other traffic. It is untrue to state that “the visibility sight lines available at the existing access have been retained in the new location.” The proposed entrance route would, because it is narrower, because it has no grass verges and because it is tightly contained within walls, greatly degrade visibility sight lines for motor vehicles and cycles entering and leaving the development. We consider that this is unacceptable in a location where vehicles have to cross a mandatory cycle lane used at all hours of the day and night by great numbers of cyclists.

**We ask members of the Planning Committee to reject this Planning Application until all the cycling issues are fully resolved.**

Yours sincerely,  
on behalf of Cambridge Cycling Campaign,

James Woodburn

Copies to:

Councillor Philippa Slatter, Councillor Edrich Adigun-Harris, Councillor Sheila Stuart, Councillor Anne Kent, Mr Brian Smith (County Council), Mr Patrick Joyce (County Council), Ms Clare Rankin (City Council).

