

February 10, 2006

Our ref: M06007
Your ref:

Sarah Dyer
Planning Department
Cambridge City Council
Cambridge CB2 3AQ



Cambridge Cycling Campaign

P.O. Box 204, Cambridge CB4 3FN
01223 690718 (phone & fax)
contact@camcycle.org.uk
www.camcycle.org.uk

Dear Sarah Dyer,

**Station Area Redevelopment – CB1
Planning Application Reference: 06/0008/OUT**

This letter is to lodge an objection by Cambridge Cycling Campaign to the above planning application on matters relating to cycling and transport.

In summary:

- 1. Traffic generation:** The scale of the development is so large, and so far beyond City Council policy – which recognises development in the area is traffic-constrained – that it will have major detrimental effects on the safety and convenience of cyclists across a wide area of southern Cambridge. This will be the case whether or not they are using the new development, because of the large amount of additional motor traffic it will generate. The planning application should be rejected completely because of this.
- 2. Traffic movements:** We understand that though this is an outline planning application, should the application be approved, all access matters will be determined at this stage¹. Therefore we request a number of planning conditions be imposed on the developer regarding access for cycles around the site to ensure that those items they propose are indeed adhered to, and those they do not include now are not overlooked later.

¹ Letter accompanying application from R.N.Dowle, December 15, 2005: 'As an outline planning application all matters of detail are reserved for subsequent approval *except for the means of access*'

3. **Cycle parking:** While we welcome the major improvements to cycle parking proposed in the plan, it is clear that insufficient space has been allowed for the numbers of spaces either proposed or required under City Council policy².
4. **Construction:** Cambridge Station will continue to be a major transport interchange during construction. Therefore we consider planning conditions are required to maintain access and parking for cyclists during the extended construction period.

1. Traffic generation

Cambridge City Council's planning brief³ for the area, adopted in April 2004, says: '*The road network in the Station area is already operating beyond capacity at peak times and development will be constrained by the need to ensure that the existing highway network can accommodate vehicle movements from development in the Station Road area*⁴ and '*Some increase in existing office (B1a) and research and development (B1b) space will be acceptable, subject to it having no significant adverse impact on peak hour traffic*'.⁵

However, the current application proposes far, far more office and residential development than envisaged by the planning brief, all of it with large amounts of car parking and all of it serviced by motor vehicles (deliveries and so on). Therefore it is clear that there will be vastly more traffic, which has already been concluded the area cannot cope with.

This will mean that the effectiveness of the Station area as a transport interchange – its primary purpose – will be severely compromised.

The extra traffic will have adverse safety implications for cyclists over the whole length of Hills Road and the wider area.

The extra traffic will compromise cyclists' ability to move freely along Hills Road and the rest of the adjacent area.

The development cannot be looked at in isolation. A very large amount of new development has taken place or is planned for the immediate area, at

- Betjeman House
- Cattle Market
- Homerton Triangle
- Brooklands Avenue / Cambridge University Press
- Tim Brinton site
- Rustat Road sites, and
- Hills Road Triangle Site

² Cambridge City Council: *Car and Cycle Parking Standards* – July 2004, p8

³ Cambridge City Council: *Station Area Development Framework, Adopted April 2004* - http://www.cambridge.gov.uk/ccm/cms-service/download/asset/?asset_id=4058489

⁴ *Ibid.* p17, sec 3.8

⁵ *Ibid.* p23, sec 3.30

Massive development is also likely at Addenbrooke's hospital⁶ in the wider area.

All these developments exacerbate this problem. But this application is by far the largest in the immediate area.

While we welcome additional and improved routes into the station itself, Station Road will still be a major route into the area for cyclists and this will be choked with traffic and will see many more turning movements. Even with the proposed cycle lanes, cyclist safety will be seriously affected on Station Road.

We therefore **object** to the planning application on the grounds that it is already known that the area cannot accommodate the additional traffic the development will generate and that it puts cyclists at significantly greater risk over a wide area.

2. Traffic movements

We welcome proposals for additional and improved ways for cyclists to access the Station from Trumpington and Long Road (the guided bus route), Hills Road, Devonshire Road and from the Carter Bridge. However, it is clear from the plans that much of what is proposed is inadequate, especially widths.

It is likely that Cambridge will introduce a congestion charging system at some time in the future. Experience in London shows that this will result in a very large increase in numbers cycling. As this site is working from a more-or-less clean sheet, this should be planned for both for moving cyclists and cycle parking.

(a) through cycle traffic

The advent of the cycle track alongside the guided busway to the south, the link to Brooklands Avenue, improved links to Devonshire Road and the east via Carter Bridge together with major development elsewhere suggest that as well as cyclists accessing the Station, new offices, residential blocks etc, a north-south cycle route through the site is likely to be extremely busy with through traffic.

Taken together these factors suggest this route may possibly become the busiest cycle route in the UK, Therefore it is essential that it is constructed to the highest standard⁷, not merely the minimums or below that cyclists so often have to suffer. While unacceptable anywhere, the construction of cycle tracks at less than minimum widths such as those we routinely see elsewhere would be disastrous here.

⁶ During the recent Hills Road bridge consultation Addenbrooke's Hospital NHS Trust reported: 'At present there are 9,000 employees working on the Addenbrooke's site. With the implementation of the 2020 vision, as set out in the Structure Plan, the number of people working on site can be expected to rise to 17,000 within the next 10 years.'

⁷ TRL AG26 *Footway and cycle route design construction and maintenance guide 2003*. Recommendations: gradients 3% (maximum 5%); width: 3m (segregated from pedestrians), crossfall: 2.5%, radius of curvature: 15m or greater, tight bend radius: 4m (TD 36/93), visibility on bends 30m, design speed 30 kmh⁻¹.

Therefore we request a **condition** that:

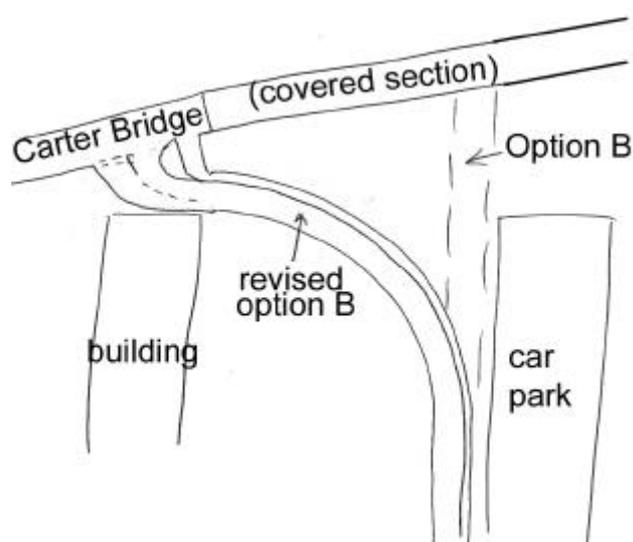
- 2.1. Cycle tracks within the site shall recognise recommended construction standards. They shall be built no narrower than 3m for two-way use (3.5m, when there is an adjacent barrier or wall), shall be as straight as possible, with minimum radii on turns of 4m (ideally 15m), have a design speed of 30 km/h and a maximum gradient of 5%.
- 2.2. Any cycle track to be shared with pedestrians without segregation shall be avoided wherever possible and if used be at least 3m wide (unbounded).
- 2.3. All roads in the area, including Station Road and Tension Road shall have a speed limit for all traffic of 20mph, enforced by cycle-friendly means⁸.

(b) ramp connecting to Carter Bridge

We **object** to the planning application because it is required to determine access arrangements, yet proposes undecided alternatives for the necessary ramp from Carter Bridge into the site. It is not clear who would decide, or when.

We **object** to ramp option A (looping under the bridge starting on the north side). It is an inadequate solution offered primarily to avoid impinging on the development rather than its main purpose, namely to improve access to the station for cycles. This option also introduces unnecessary crossing movements on the bridge and mixes cyclists and vehicles at the car park entrances.

While we welcome option B (a straight ramp), we are advised by a structural engineer that it is unlikely to be structurally practical as proposed. We think it would not be difficult to join such a ramp at a point opposite the point proposed for option A, and that this should be



provided for as a planning condition if option B as proposed is not workable (see Figure). Whatever the joining point, visibility needs to be considered in *both* directions at the junction with the bridge, so sufficient space must be allowed at the joining point for a large platform.

Any solution should vertically segregate cycles from motor traffic using the car park entrance. We like the solution in option B, but if a ramp is built which brings cyclists to ground level earlier the car park entrances should be at first floor or basement level instead to achieve this.

Both options show cycle tracks of inadequate width. Central guard rails are an anathema: they are hazardous and reduce effective widths considerably. Side guard rails on a raised structure are essential, but it must be recognised that these also reduce the effective width.

⁸ speed cushions not humps, no buildouts, narrowings with cycle bypasses on both sides, speed responsive signs, occasional speed tables.

Therefore we think the following **conditions** should be imposed on the developer:

- 2.4. There must be a ramp with a gradient no greater than 5% leading from the south side of the Carter Bridge directly into the station area suitable for use by cyclists and pedestrians.
- 2.5. The ramp from Carter Bridge must pass over or under the car park entrances.
- 2.6. The ramp must be constructed to at least the same standard (total width, allocation between cyclists and pedestrians, and separation method) as the existing bridge.

(c) access from Devonshire Road

While we welcome the proposed diagonal path into the station from Devonshire Road replacing the wholly unsatisfactory current arrangement, the width shown on the plan is far too narrow. Therefore we think the following **conditions** should be imposed:

- 2.7. Cycle and pedestrian access to the Station area must be provided from Devonshire Road
- 2.8. Access from Devonshire Road must segregate cyclists and pedestrians and provide at least the same widths as the Carter Bridge, except that if there is no solid wall or barrier alongside the cycle track, the cycle track may be 0.5m narrower.

(d) The Chisholm Trail

Cambridge Local Plan recognises the ambition to provide a long distance, high quality cycle route along the whole railway corridor through Cambridge⁹. The guided busway will realise this south of the station. The intention at the northern end is to pass under the spare arch of Mill Road bridge. Therefore this access should be protected by a **condition** such as this.

- 2.9. A 5m wide straight corridor shall be made available for future construction of a cycle/pedestrian path between the southern end of the Devonshire Road access path and the northern edge of the site to align with the railway service road to the west of the railway lines.

(e) access from the south

We welcome the proposed link to the Brooklands Avenue junction with Hills Road and the link to the cycle track to be provided alongside the guided busway under Hills Road Bridge.

The number and size of vehicles using the new road will be large, even though it will be restricted to buses, taxis and cycles. Buses will be manoeuvring in the area round the bus stops – it is not sensible to mix a bus station with through cycle traffic. Therefore it will be helpful to and safer for cyclists to be segregated, especially from buses.

⁹ Cambridge City Council: *Supplementary Planning Guidance: Protection and funding of routes for the expansion of the city cycle network* - <http://www.cambridge.gov.uk/ccm/navigation/environment/planning/development-control/general-planning-advice/supplementary-planning-guidance/city-cycle-network/>

Therefore we request that the following **conditions** should be imposed:

- 2.10. Mandatory cycle lanes (at least at recommended widths) shall be provided on both sides of the access road between Hills Road and the junction with the guided busway and the access road shall be of sufficient width (10m) to accommodate these.
- 2.11. An Advanced Stop Line shall be provided at the new road approach to the Hills Road/Brooklands Avenue junction.
- 2.12. Consultation will be conducted to inform the redesign of the Hills Road/Brooklands Avenue junction in order to achieve safe and convenient turning movements for cyclists entering and leaving the new road.
- 2.13. Cycle traffic shall be segregated from buses in the bus station area. Means of segregation will be decided in consultation with relevant parties. Segregated provision for cyclists shall recognise minimum recommended widths.

(f) Station Road

While we **object** to the plan because Station Road, among others, will become so congested it will be unusable, we are also concerned in detail about the rising bollards proposed at the eastern end, and the proposed cycle lanes.

The plans show no provision for cycle bypasses for these bollards, as is the usual case elsewhere. Furthermore, the location of bus stops immediately beyond them will create conflicting movements between buses and cycles.

Therefore instead of narrowings to create the bus gate, we request a **condition** that

- 2.14. Cycle bypasses at least 1.5m wide shall be provided in both directions at any bus gate.

Further, we **object** to the proposal for bus laybys in this location, as they will seriously compromise cyclists' safety. We would oppose further bus stops or bus layover facilities in Station Road should any be proposed.

The proposed cycle lanes in Station Road are below absolute minimum widths, let alone recommended widths. As Station Road is being widened, there is no excuse for this. We therefore **object** to the plan as it stands on these grounds and request a **condition**:

- 2.15. Mandatory cycle lanes shall be provided along all of Station Road to a minimum width of 1.5m.

(g) Cycle access into Station

Every day many hundreds of cyclists arrive and depart by train with their cycles. Access to the station entrances should take account of this. We request the following **condition**:

- 2.16. Flush kerbs and space to mount to and dismount cycles without blocking pedestrian and other traffic shall be provided at station entrances.

3. Cycle Parking

(a) non-Station cycle parking

While the applicants have said that cycle parking will be provided for the office and retail development, they have not said where. Requirements for cycle parking will conflict with some of their other aspirations and unless the locations are spelled out, at least in principle, in any planning approval, we think it is extremely likely that attempts will be made to place them in inconvenient, relatively inaccessible locations or omit them completely. In new development cycle parking provision must, in almost every case, be accommodated within the site boundary of each building rather than on public highway or public open space.

We wish to make it clear that we **object**, and will object at later stages of the planning process in relation to this area, to any proposals or concessions which:

- Fail to implement Cambridge City Council's Cycle Parking Standards in full
- Fail to allow adequate space (1.5m² per cycle¹⁰) for cycle parking stands and gangways
- Fail to allow safe and easy access for all categories of cyclists, including the young and the elderly
- Attempt to incorporate any cycle parking requirements for the other buildings planned for the Station Area into the areas allocated for cycle parking for Station users
- Attempt to incorporate any cycle spaces used for the storage of bicycles for hire or for sale (by, for example, a cycle shop linked with the Station cycle parking) into the total number of publicly accessible spaces. Hire and sale cycle spaces must be additional to these figures.

The overall area quoted in the application is wholly insufficient to accommodate the number of cycle parking spaces that will be required. Our calculations of the amount of non-station cycle parking required by the City Council's Cycle Parking Standards indicate a figure of around 5,000 spaces, or perhaps more. (We would like to see the developer's figure and calculations). 2,000 spaces, expandable to 3,000, are required for station cycle parking. The space requirement for each bicycle is 1.5m² when gangways are accounted for. This means that the total space requirement for cycle parking in this development is provisionally estimated to be 12,000m² rather than the figure of 5,243m² provided by the developer¹¹ which we believe to be a gross underestimate.

Location is important. Office commuters have different requirements from visitors to office premises, and shoppers.

In particular it would not be acceptable to include cycle parking for any of the office, retail or public premises in the Station cycle park.

¹⁰ See attached appendix. This says: 'Where cyclists are likely to be carrying significant amounts of luggage (eg shopping centres, tourist destinations etc), or child seats (schools, shops, leisure facilities etc) additional space should be allowed.' That is certainly the case here so the slightly higher figure of 1.5m² is entirely appropriate.

¹¹ Planning Statement, December 2005, p4

Office parking for employees could be at basement level (but sub-basement is too inconvenient), provided it is accessible without dismounting and by means which do not unduly conflict with car traffic or pedestrians. However, all offices will have visitors so all office premises must have visitor cycle parking at ground level near to their entrances. This is especially important, though not limited to, locations where employee cycle parking is lockable.

Shops are similar, except that their 'visitors' are their customers, so the balance of numbers is that most of their cycle parking must be at ground level near the shop entrance.

In the case of those shops/cafés/restaurants fronting onto the station square there will be a large number of spaces required in the square itself. We cannot see how these can be reserved specifically for customers. Therefore for these locations (only) we take the view that so long there is the required total number of spaces for all these shops, and they are reasonably distributed around the square, then the obligation to provide spaces is met and if they are also used by railway customers, so be it.

No cycle parking spaces for the premises in the square are shown on the plans. We think that the applicant has overlooked quite how many spaces will be required in the square, the only acceptable place they can be put. For example, we calculate that just for the shop on the north side of the square, there would need to be the equivalent of a row of racks across the entire frontage of the shop to meet requirements of the City Council's policy. If this were a restaurant there would be 2½ rows.

For those shops along Station Road integrated into office blocks, it is reasonable that customer and office visitor parking be combined in one area near to the entrances at each block so long as sufficient spaces are provided in total.

Cambridge Station currently has one of the highest rates of cycle theft and vandalism in the City. It is one factor that discourages people from using a cycle to get to the Station. Therefore we think it is important that new cycle parking be provided with the highest levels of security and in particular any reasonably large group of spaces is supervised by CCTV (including the station user cycle parking).

Therefore we request planning **conditions** are imposed as follows:

- 3.1. Cycle parking for office, retail and residential premises shall be provided at least to the standard provided for in Cambridge City Council's cycle parking standards.
- 3.2. Cycle parking for retail (shops, cafés, restaurants) fronting onto the Station Square shall be provided in aggregate, distributed around the Square.
- 3.3. Private cycle parking for office premises will be accessible by riding a cycle.
- 3.4. Office premises shall be provided with visitor cycle parking adjacent to the entrances
- 3.5. CCTV shall be provided to supervise all cycle parking areas with more than 50 spaces (25 racks).

(b) Station user cycle parking

It is not clear from the application how many floors the proposed multi-storey cycle park would need to have. However, our calculations suggest that the ground area allocated for it is probably inadequate. In particular, it will almost certainly be found to be unacceptably high should the possible extension upwards to 3,000 spaces be built. The applicants do not seem

to have allowed for the infrastructure of such a building (ramps, lift shafts, stairs), or are using an unrealistically high packing density for racks.

Furthermore, such a facility would not be complete without an integral cycle shop and bike hire business. This would also allow for valet parking, and staff supervision (essential for security). Space needs to be allowed for this.

We think it would not be unreasonable if one floor of the multi-storey cycle park were below ground. However, all spaces need to be accessible on a bike: cyclists must be able to cycle to a space up ramps, and the pedestrians they become once parked, including people with mobility difficulties (many find cycling easier than walking) must be able to exit the building easily.

The location of the cycle park is entirely contingent on a fully operational Station entrance nearby; the creation of such an entrance should be mandated. Otherwise, the proposed cycle park is located too far from the Station. Without an enforceable sanction it will be too easy for the applicant simply to say this was not achievable and therefore for an unworkable cycle park to be built.

Though the aspiration for 3,000 spaces in future is offered, we consider this is no more than words on paper. It will be an expensive addition at a later stage, and therefore will simply not happen unless a means is found to enforce it now, in the current planning obligations. The cheapest and easiest method to do this would be to provide 3,000 spaces now. Any other solution would require complex arrangements for money in trust and future guaranteed planning permissions, and the developer's clearly bullish attitude to this application suggests to us that they would probably do their best to avoid any such obligation in the future.

However, as we pointed out above, we doubt it would be acceptable to build additional storeys within the footprint of the currently proposed cycle park. Further, while there are some advantages in concentrating cycle parking in one location, there are also disadvantages, especially for the large number of cyclists approaching from the north. For these cyclists it would be better to provide a significant number of spaces (say 1,000 out of the 3,000) north of the Station. We think that the easiest way to do this is at first floor level in the car park, accessed from the raised ramp proposed from the Carter Bridge. We take no view regarding whether this would replace or add to the car parking.

Therefore we **object** to the application for the cycle park as it now stands, as inadequate, and propose that **conditions** be imposed as follows:

- 3.6. 3,000 cycle parking spaces shall be provided for Station customer long-term parking. These shall be reasonably distributed between a cycle park immediately to the south of the station buildings and another to the north.
- 3.7. No construction shall start anywhere on the site until all necessary agreements have been concluded to provide an additional fully-serviced full-time entrance to the Station from the range of buildings backing onto platform 3.
- 3.8. Provision for a cycle shop and cycle rental business shall be made within the southern Station cycle park. The total number of public cycle parking spaces required shall not include any spaces required by an operator to run a cycle rental business. The total number of public cycle parking spaces required may include a reasonable number of paid-for valet parking spaces operated by the business.
- 3.9. Provision shall be made within the cycle parks for (a) ramps suitable for cycling with a gradient of no more than 5% (ideally 3%) to reach all floors, (b) both lifts and stairs, lifts to be capable of carrying cycles, trailers and tandems.

4. Construction

Construction will take many years and clearly inconvenience large numbers of people over this time. This inconvenience must be mitigated. Among what we are sure will be many **conditions** to achieve this, we request the following be included:

- 4.1. Access to the Station during construction will be maintained at all times along Station Road.
- 4.2. Access to the Station during construction will be maintained at all times for cyclists and pedestrians from Devonshire Road.
- 4.3. Construction will not start until access for cyclists and pedestrians to Station Road through the Triangle Site from Hills Road is reinstated.
- 4.4. Cycle parking spaces will not be reduced from their present number during construction.

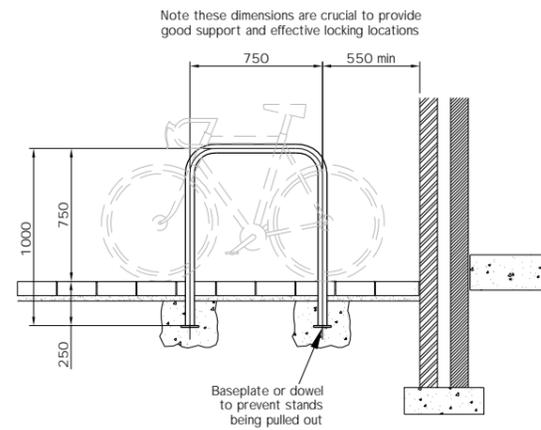
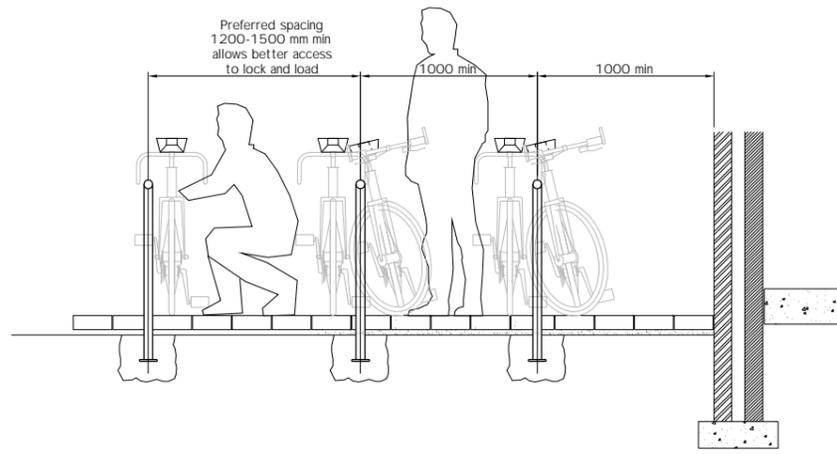
Conclusion

To conclude, we request that the planning application be turned down on the grounds that it is so much larger than provided for in City Council policy and that the increase in traffic it will create cannot be accommodated in the wider area.

However, should the Council be minded to approve the application, we request that it imposes conditions to the effect of those we suggest above in order to ensure that cyclists using the area are provided for adequately.

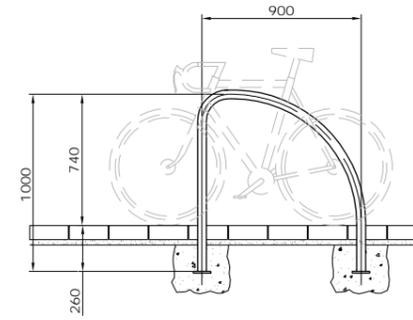
Yours sincerely,
on behalf of Cambridge Cycling Campaign,

David Earl

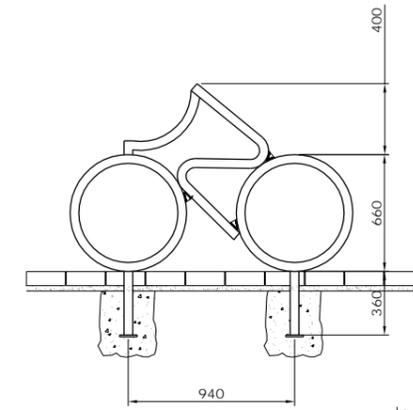
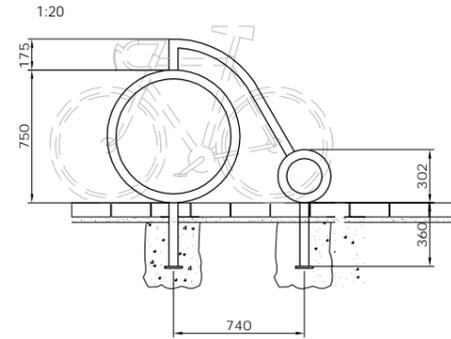


SHEFFIELD STAND DETAILS

1:20



BESPOKE STANDS



SHEFFIELD STAND ADAPTED FOR CHILDREN'S CYCLES

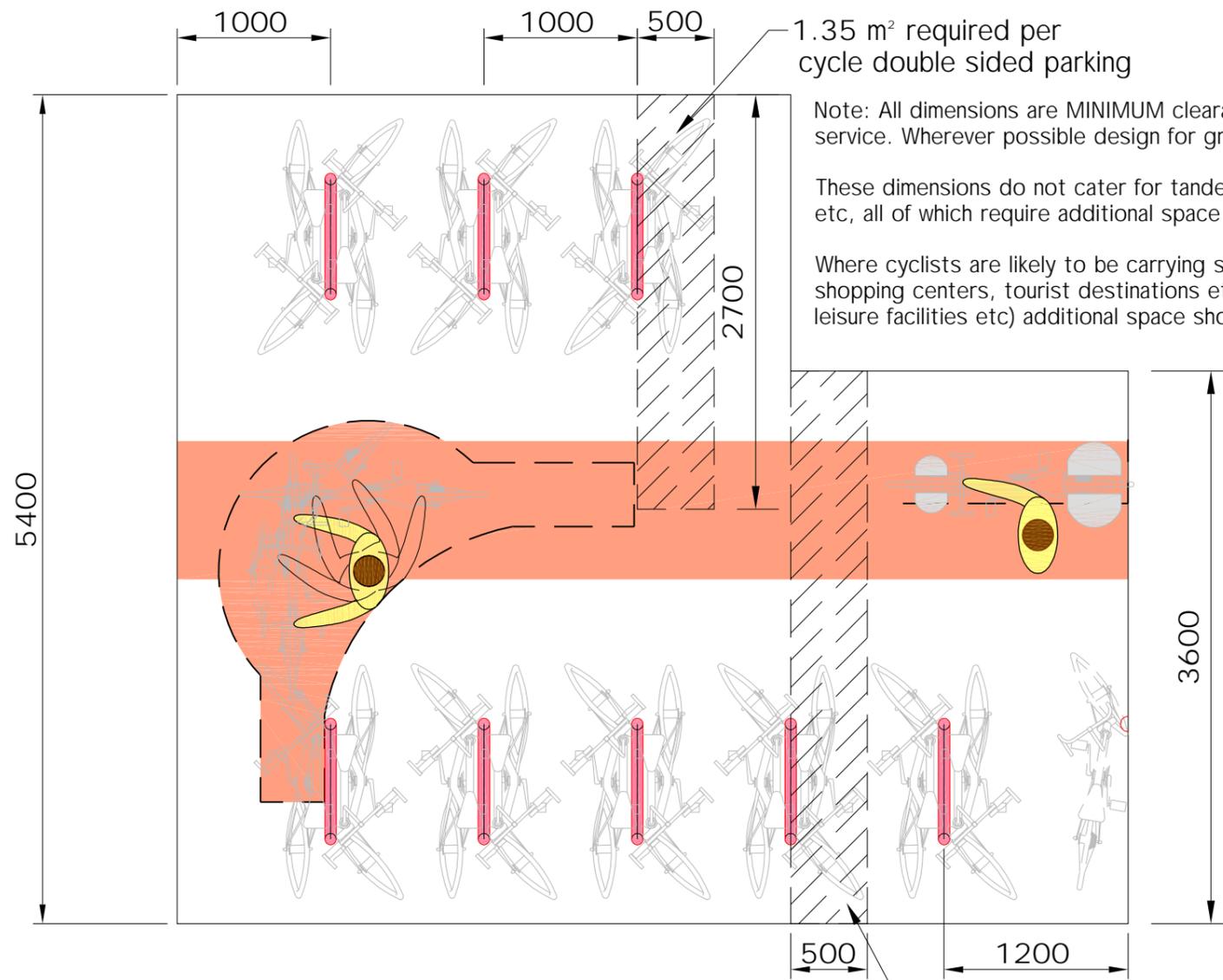
1:20

1.35 m² required per cycle double sided parking

Note: All dimensions are MINIMUM clearances for an acceptable standard of service. Wherever possible design for greater clearance.

These dimensions do not cater for tandems, trikes, child trailers, trailer bikes etc, all of which require additional space to park and manoeuvre.

Where cyclists are likely to be carrying significant amounts of luggage (eg shopping centers, tourist destinations etc), or child seats (schools, shops, leisure facilities etc) additional space should be allowed.



Notes for designers

Stand type.

Sheffield stands should be used unless there is a compelling reason otherwise. Be wary of proprietary stands which often perform poorly but cost considerably more. Where children's bikes are expected a lower locking bar should be added. Lockers are preferred where cycles are likely to be left outside overnight (residential) or at high risk locations such as railway stations.

Spacing

Stand spacing is critical to the success of a cycle parking scheme. 1.0 m is the minimum for an acceptable level of service. Reducing spacing below 1m to fit in additional stands reduces the capacity of the facility as it ceases to be practical to use both sides.

Allowance must be made for:

- Access to locking points, without having to come into contact with potentially oily parts of the bike or its neighbours.
- Parking / removal without snagging on neighbouring cycles.
- Extra width for loading / unloading of luggage and children in bike seats (especially at retail / residential / leisure destinations) - increase spacing to 1.5m +
- Longer / wider cycles such as trikes, tandems and child trailers.

Manoeuvring space

Cycles need to be manoeuvred into their final parking space without undue difficulty. Ideally a clear zone of at least 2m should be provided although in tight locations this can be reduced.

Allowance must be made for:

- Encroachment by motor vehicles (bumper overhang, door opening, pavement parking etc).
- Longer, wider cycles, trailers and trailer bikes, less mobile riders (eg young or elderly riders who find manhandling their cycles in confined spaces difficult).

Access

The parking area should be freely accessible from the road or cycle path without needing to dismount. It should be free of:

- Barriers
- Steps in level (including bull nosed kerbs).
- Sharp corners
- Blind junctions / corners
- Obstruction by vehicles, including bumper overhang, opening doors etc.

Consideration should be given to the presence of pedestrians who are likely to use or cross the access path, whether or not it is designed for them to do so. Target width should be at least 2.0 m, wider if flows are high, and at least 3.0m where pedestrians are to be expected. Absolute minimum width = 1.5m but this will rarely be appropriate for access to parking areas.

Location

Cycle Parking should be located close to the riders' final destination. For short stay (eg retail) the walk to destination should not exceed 20m, for long stay (residential, transport interchange) it should not exceed 50m.

Cycle parking should always be located such that it is well overlooked and well lit. Consideration should be given to the likelihood of theft, vandalism and antisocial behaviour. Also to the perceived sense of personal security of the users.

Cycle Parking should be located where it will best serve the users, not in redundant corners which are unsuitable for other uses.

Weather Protection

Weather protection should be provided wherever possible. Particular consideration should be given in long stay locations such as residences and workplaces.

**CYCLE
PARKING**

