

Station Front proposals: Objection

7 June 2019 - Ref: 19/00535/FULM



Dear City of York Council Planning Officers,

1. The York Cycle Campaign welcomes the opportunities that the Station Front proposals (planning application reference 19/00535/FULM) present in terms of improving sustainable transport options, including segregated cycleways in front of the station. Unfortunately we must object to this application as it currently stands, primarily because in a number of key features, the perceived convenience and aesthetic preferences of a few appear to have been prioritised over the safety of highway users. This has led to dangerous highway designs including the combination of on-street parking and an on-road advisory cycle lane northbound on Queen Street and choice of stone setts as a surface for the proposed segregated cycleways, despite the noted danger of setts as a surfacing material by authorities on segregated cycleways. In other words, we are objecting on the basis of paragraphs 108(c) and 109 of the National Planning Policy Framework (NPPF), for reasons that we elaborate on this objection. We also have concerns about the provision for cycle parking and how extra cycle traffic generated by the new Scarborough Bridge will be safely accommodated by this proposed development. We don't want York to miss out on the potential benefits offered by this scheme, so we urge you to address the risks currently posed to highway users by recommending the changes to the highway design and construction we identify in order to adequately reduce these risks.

Structure of this objection:

2. We have structured our objection as follows:
 - A. The threat to cyclist safety from the on-street car parking provision and advisory cycle lane northbound on Queen Street;
 - B. The threat to cyclists safety from the proposal to use stone setts as the surface for the segregated cycleways;
 - C. Cycle parking requirements;
 - D. Cycle access requirements;
 - E. Why a segregated cycleway on Queen Street would also help the application better meet the requirements of the NPPF and submitted City of York Local Plan policies.

A. The threat to cyclist safety from the proposed on-street car parking and advisory on-road cycle lane northbound on Queen Street

3. At present, the application proposes to provide on-street car parking and an advisory on-road cycle lane northbound on Queen Street¹. This is apparently to prioritise resident access to the parked cars and due to the view that this layout is safer for all road users. Sadly, the opposite is true, as we show in this objection: The lethality of the proposed on-street car parking and advisory cycle road lane comes from the likelihood that users of these parking bays (which would be new additions to this route) would occasionally take insufficient care when opening vehicle doors. The sudden opening of a vehicle door in front of oncoming cyclists poses a serious threat of injury to these cyclists in itself: so-called 'dooring'. A still greater threat however is what has tended to happen next in such accidents across the world: the cyclist is either sent in the direction of incoming traffic, or,

¹ Page 61, General Arrangements, Phase 1, *York Station Frontage Design and Access Statement*, City of York Council

Station Front proposals: Objection

7 June 2019 - Ref: 19/00535/FULM



downed on the road, is run over by following vehicles. The heavier the vehicle, the greater the risk of death or serious injury to the cyclist. As you will appreciate, the high number of buses who will continue to use Queen Street to pick up or drop off passengers from the station means that unfortunately the risk to downed, intensely vulnerable cyclists following a 'dooring' is very high indeed. Examples of this can be seen at the Dutch Reach website (warning: graphic content that viewers may find distressing)². Likewise, to take just one city, 10 cyclists have been killed so far this year in New York, some of whom "crashed into open car doors, flew into the street and were run over"³. Video evidence of a moped driver suffering life-changing injuries following just such an event in London was posted on the Metro's website⁴ last month.

4. Although we represent cyclists in York, the Metro's video underlines that it is not just cyclists who are put at risk by the combination of a parking bay and on-road cycle lane, but motorcyclists, moped drivers & their passengers too⁵. In our view this further strengthens the case for refusal of this application as it currently stands on the grounds of highway safety, or as paragraph 109 of the NPPF puts it, that "development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety."⁶

Our recommended solution: move the cycleway to the pavement, making it off-road/segregated

5. This risk to cyclists posed by the on-road cycle lane and parking bays could be mitigated in various ways:
 - i. The heavy vehicles could be removed from this route, thereby ensuring that if cyclist-vehicle collisions do occur following a 'dooring', the lower mass of the vehicle involved would mean that serious injury or death is less likely to occur;
 - ii. The parking bays outside the houses could be removed, thereby removing the risk of 'dooring';
 - iii. Cyclists could be moved out of harm's way by re-locating the cycle lane to the pavement, i.e. the cycle lane would become an off-road cycleway.
6. Removing heavy vehicles like buses from Queen Street is obviously a non-starter, not least because it would contravene paragraph 110 of the National Planning Policy Framework (public transport connections should be prioritised) and submitted policy T1 (Sustainable Access) in the City of York Local Plan. It is also clear from the comments from residents on Queen Street that they would like to retain the proposed parking bays outside their houses. If so, the only solution is to move the cyclists out of harm's way, by moving the cycleway to the pavement, thereby making the cycleway an off-road/segregated one. We believe this is unquestionably the lowest risk arrangement for all highway users, as our analysis of the safety review for these two cycle access options in the following paragraphs shows. We therefore urge you to recommend that this change be made to the proposals, not least because of the wider planning benefits that the subsequently

² 'Doorings' victims not just cyclists, *Dutch Reach Project*. WARNING: GRAPHIC VIDEO CONTENT OF ACCIDENTS: <https://www.dutchreach.org/doorings-not-just-cyclists/>

³ Hidalgo Bellows, K: 'In Brooklyn, Deaths Provoke Debate Over Bike Lanes', The New York Times Student Journalism Institute, 30 May 2019: <http://nyc19.nytimes-institute.com/2019/05/30/in-brooklyn-deaths-provoke-debate-over-bike-lanes/>

⁴ 'Shocking moment biker thrown under a bus when driver opened car door', Metro, 19th May 2019, <https://metro.co.uk/2019/05/19/shocking-moment-biker-thrown-under-a-bus-when-driver-opened-car-door-9601086/>

⁵ 'Doorings' victims not just cyclists, *Dutch Reach Project*. WARNING: GRAPHIC VIDEO CONTENT OF ACCIDENTS: <https://www.dutchreach.org/doorings-not-just-cyclists/>

⁶ Page 32, *The National Planning Policy Framework*, The Ministry for Housing, Communities and Local Government, 2019:

Station Front proposals: Objection

7 June 2019 - Ref: 19/00535/FULM



increased cycling levels would mean for York in terms of air quality, health, carbon emissions and congestion, which we outline later in this response.

The City of York Council's Safety Review of an on-road versus off-road cycleway on Queen Street

7. In late 2018 the Council officers responsible for the Station Front proposals commissioned a Safety Review comparing on-road and off-road cycleway options on Queen Street. This review concluded that an on-road cycleway posed less overall risk to users of the road and pavement than an off-road cycleway of the kind that we are calling for. Having read the review however, we believe that it is flawed in the following ways:
 - i. It consistently fails to quantify the risk of issues that it identifies. This is clearly of critical importance to decision-makers trying to weigh up the likely implications (good and bad) of each option. This failure means that the risks the review identifies could be read as having an equal probability as each other, when they demonstrably do not.
 - ii. It focuses disproportionately on the risk of cyclist-pedestrian collisions on a northbound segregated cycleway. We feel that such a focus is disproportionate firstly because by each mode having their own space, the risk of cyclist-pedestrian collisions will be low. Secondly, even in the rare cases that such collisions do occur, their low-speed, low-mass nature means the risk of injury is similarly low. This is in marked contrast to the much higher risk of injury that the higher-speed and considerably higher mass collisions that cyclist-motorist collisions result in. Our analysis of DfT road traffic accident data for York for example shows that between 2015-2017, 158 cyclists were injured, sometimes seriously, in collisions with motor vehicles, representing 28.8% of all casualties from road traffic accidents in York over this period. By contrast, just three pedestrians were slightly injured due to collisions with cyclists, representing 0.55% of all casualties. This compares to the 77 pedestrians who were injured, sometimes seriously, in collisions with motor vehicles. To focus on the risk of cycle-pedestrian casualties thus is to focus on the 0.55% of casualties and ignore the much higher 28.8% of casualties, namely the 158 cyclists who were injured, sometimes seriously, in collisions with motor vehicles. In short, **dwelling only on the risk of cycle-pedestrian collisions and casualties misrepresents the real risks posed to highway users from traffic collisions on Queen Street** (comparing casualties from cyclist-pedestrian collisions to those cyclist-motor vehicle collisions) **by 52 times or 5200%**⁷;
 - iii. Although the review acknowledges the risk of "cycle conflict with car doors" that an on-road, advisory cycle lane would result in, the review fails to acknowledge the additional risk that such on-road 'dooring' results in such circumstances, as documented across the world, of cyclists being subsequently run over by following or oncoming motor vehicles. This means that the safety review greatly understates the threat to cyclists from being 'doored' on the main carriageway;
 - iv. The review fails to mention the very small number of households which might seek to access vehicles parked (eight in total, but as central York households, they are statistically much more likely to walk or cycle trips than outer York households e.g. 27% of Holgate residents cycle or walk to work compared to 9% of Bishopthorpe residents⁸), and the similarly small number of times that each household might seek to do so every day on average. This compares to the 616 cyclists estimated by DfT's Propensity to Cycle Toolkit

⁷ From road traffic accident data (STATS19) logged against Local Authority: York (189) in Road Safety Data published by the Department of Transport available under Open Government Licence. See: <https://data.gov.uk/dataset/cb7ae6f0-4be6-4935-9277-47e5ce24a11f/road-safety-data>

⁸ Table QS701EW - Method of travel to work, Census 2011: <https://www.nomisweb.co.uk/census/2011>

Station Front proposals: Objection

7 June 2019 - Ref: 19/00535/FULM



that would use such a northbound segregated cycleway on Queen Street⁹. So, for example, if five of these households seek to access their parked vehicle twice a day, once in the morning and once in the evening, the vast majority of the 616 cyclists would pass the parking bays with no chance of conflict or having to wait briefly;

- v. In particular, the review misrepresents momentary inconvenience on a northbound segregated cycleway as risk. Either vehicle users will have to wait for cyclists to pass, or cyclists will have to wait for vehicle users to close doors before they can pass. An off-road cycleway will be of most benefit to the three-fifths of the adult population who don't cycle on the roads because they consider the roads too dangerous¹⁰. If the price of being able to escape the road and enjoy much safer cycling provision is a one in 100 chance (likely even lower than this) of occasionally having to wait for a few minutes, these cyclists will likely be more than happy to do so;
- vi. It fails to acknowledge that vehicles users are legally required not to "open, or cause or permit to be opened, any door of a vehicle on a road so as to injure or endanger any person", and that failure to do so is a criminal offence¹¹. Responsibility for ensuring vehicle doors are not opened in this manner therefore lies solely with the occupants or users of vehicles such as those which might be parked in the bays on Queen Street. This sole responsibility on vehicle users means that they are the only party who should be 'advised' to take particular precautions when seeking to access or exit their vehicles parked in the bays proposed in this application. Suggesting that it is "advisable" for cyclists to keep a distance from parked cars implies a responsibility that doesn't exist;
- vii. The review fails to account for learning by all users of this "unconventional" arrangement. It is similarly unusual in the UK for cyclists to be given priority over side roads, yet drivers in Leeds have adapted to cyclists having priority where Leeds' cycle superhighways cross side roads, by looking out for cyclists and letting them pass before proceeding down or out of these side roads. The same learning is likely to occur by all users of a pavement/off-road cycleway/parking arrangement, however unusual it might first appear to York residents;
- viii. The review fails to acknowledge that a small but significant proportion of cyclists are likely to continue to use the road rather than an off-road cycleway, because they are sufficiently confident to cycle on the roads. This is perfectly normal, but means that the number of cyclists using an off-road cycleway, and the accompanying risk of conflict suggested by the review, will be lower than it acknowledges;
- ix. The review overplays the likelihood that this off-road cycleway might be used in both directions. By failing to quantify *how* likely such a possibility is, it implies that it is **as** likely that cyclists will use the off-road cycleway northbound as southbound. In practice, it is very unlikely that many southbound cyclists will use any off-road cycleway on the west side of Queen Street given the proposed segregated/off-road cycleway for southbound cyclists on the east side of Queen Street. Southbound cyclists using an off-road cycleway on the west side of Queen Street would also face real difficulties exiting on to Blossom Street, thereby deterring such use;
- x. The review massively overstates the risk of cyclist-pedestrian collisions in shared areas . As a Campaign, we prefer that cyclists are given their own space. However, shared spaces are common in York (a fact unacknowledged by the review despite suggesting that the "unconventional" arrangement that an off-road cycleway on the west side of Queen Street

⁹ See 'Go Dutch' scenario in the Propensity to Cycle Tool (PCT) layer for Queen Street in the Cycling Infrastructure Prioritisation Toolkit, which uses an updated version of the PCT: <https://www.cyipt.bike/> . Further information about the PCT can be found here: <https://www.pct.bike/tabs/manual.html>

¹⁰ Page 16, 'Factors influencing cycling rates', *Walking and Cycling Statistics, England: 2017*, Department for Transport, 2018

¹¹ Regulation 105, The Road Vehicles (Construction and Use) Regulations 1986, and section 42 Road Traffic Act 1988.

Station Front proposals: Objection

7 June 2019 - Ref: 19/00535/FULM



would mean greater risk - if so, surely the reverse holds for commonplace arrangements such as shared space) and cyclists and pedestrians use them without problem. Suggesting that shared spaces at a side road (for example) might pose noteworthy risk of cyclist-pedestrian collisions is simply not credible, nor is it supported by over a decade of road traffic collision statistics for York, which appears to suggest that despite tens of millions of cyclist journeys in cyclist-pedestrian-only areas in York, only a handful of injuries from collisions have been recorded between 2005-2017¹². By contrast, again, 74 pedestrians have been injured in collisions with motor vehicles in York in just the last three years¹³. This suggests again that by focusing only on the risk of casualties from cyclist-pedestrian collisions, **the review is underreporting the real risk to pedestrians from traffic collisions - collisions with motor vehicles - by up to 100 times, or 10,000%**;

- xi. The review's conclusion strays into the normative judgement that "the options set out also have to include parking for local residents", an odd statement for what is supposedly to be a review focused solely on safety, not on suggested rights for residents;
- xii. The review's 'analysis' is confused, recommending the option most likely to result in serious injury or death regardless of transport mode. It claims, wrongly in our view for the reasons given, that both options force cyclists to "mix with another road user". In the case of an off-road cycleway, the review suggests that cyclists will mix with pedestrians; in the case of an on-road cycle lane, the review suggests that cyclists will mix with motor vehicles. As collisions between cyclists and high-speed, high-mass motor vehicles (2-3 tonnes in the case of cars or vans; 10-30 tonnes in the case of buses or lorries) are far more likely to result in serious injury or death than a considerably lower speed and lower mass (perhaps 0.15 tonnes total) cyclist-pedestrian collision, one would surely expect a review specifically designed to reduce risk of injury and death to recommend the option which only carries the small risk of low speed, low mass collisions. Yet astonishingly the safety review recommends the opposite - it recommends that cyclists "mix" with the fast, high-mass motor vehicles! And that's without it considering the heightened risk posed to cyclists by being 'doored' on a heavily-trafficked road like Queen Street, which is likely to lead to cyclists being run over by following or oncoming vehicles that may well be buses;
- xiii. The review's 'analysis' also makes the entirely unsupported claim that "the majority of cyclists" will consequently use the road. This betrays a real lack of understanding of the factors that enable or deter cycling. It also reveals a misunderstanding of who the "cyclists" are in this case, very much suggesting that the author is only considering confident cyclists who currently use the road, and not the extra 300 cyclists who the DfT's reliable, data-driven Propensity to Cycle Toolkit forecasts would use Queen Street if a northbound off-road cycleway was provided. By definition these extra cyclists are people who would not have cycled the route without an off-road cycleway, most likely because they considered the road too dangerous, as consistently reported in the DfT's Walking and Cycling Statistics¹⁴. Many of these extra cyclists will be those currently underrepresented on York's roads: women, the old and the disabled, all groups that under equalities legislation, City of York Council is under a duty to ensure its services (such as its transport network) do not discriminate against. The propensity of these groups to cycle has been conclusively shown by DfT-commissioned research to be disproportionately sensitive to the availability of cycle

¹² See Bikedata, where the UK's road traffic collision data between 2005-2017 is mapped - look for areas where cyclists share areas with pedestrians: <https://bikedata.cyclestreets.net/collisions/#18/53.95637/-1.08903/opencyclemap>

¹³ From road traffic accident data (STATS19) logged against Local Authority: York (189) in Road Safety Data published by the Department of Transport available under Open Government Licence. See: <https://data.gov.uk/dataset/cb7ae6f0-4be6-4935-9277-47e5ce24a11f/road-safety-data>

¹⁴ 'Statistical data set: Walking and cycling statistics', Gov.uk: <https://www.gov.uk/government/statistical-data-sets/walking-and-cycling-statistics-cw>

infrastructure that protects cyclists from motor traffic i.e. the more such infrastructure, the disproportionately more likely it is that these groups will choose to cycle¹⁵.

8. In short, this safety review is fundamentally flawed as it makes recommendations without considering the actual risk of casualties to road users as made clear by over a decade of traffic collision data in York. This data shows that pedestrians and cyclists are both at far higher risk of injury or death from collisions with motor vehicles than they are through any collisions with each other. If, thus, the layout of Queen Street is to be designed in such a way that minimises risk for “all users”, as paragraph 108(b) of the NPPF requires, the clear, evidence-supported solution is to separate cyclists from having to mix with motor vehicles by putting them on an off-road cycleway northbound along Queen Street. As the first set of proposals on the Station Frontage scheme incorporated just such a segregated cycleway it is clearly not a problem of insufficient highway width. We therefore urge you recommend this be implemented.

B. The threat to cyclists safety from the proposal to use stone setts as the surface for the segregated cycleways

9. We have always welcomed the proposed provision of segregated cycleways as part of this scheme, whose worth in encouraging significantly more people to cycle is well-demonstrated across the world. So we are horrified to see the proposal that these segregated cycleways be surfaced with an inappropriately dangerous material, which appears to have been chosen entirely for aesthetic reasons: stone setts. We ask that you consider the approach and lessons learned in another 2,000 year old medieval city that has over recent years been investing heavily in cycle infrastructure and now has the most experience of segregated cycleways in the UK: London. To quote its London Cycling Design Standards:
 - i. “The riding quality of any cycle track should be at least as good as that of the adjacent road.”¹⁶
 - ii. “It should be borne in mind that one of the most common reasons why some cyclists use the main carriageway, in preference to a cycle track alongside the road, is that the riding quality of the main road carriageway is better.”¹⁷
10. And in its paragraph 7.2.2 on Surfacing materials, the direction that surface “types to be avoided for general cycling use include:
 - i. Paving slabs/flags - lower wet skid resistance and risks of trips and rocking;
 - ii. Cobbles (pebbles in concrete) - uncomfortable surface with poor skid resistance”;
11. Instead, it recommends that asphalt “should be the default provision for cycling”¹⁸.
12. Taken together, because this application proposes to use a smoother surface material for the main carriageway (described in the Design and Access Statement as a “buff road surface”), its proposed surfacing of the segregated cycleways fail the London Cycling Design Standards in two key ways:

¹⁵ Aldred, R; Elliott, B; Woodcock, J; Goodman, A: ‘Cycling provision separated from motor traffic: a systematic review exploring whether stated preferences vary by gender and age’. *Transport Reviews*, Vol 37, Issue 1, 2017. <https://www.tandfonline.com/doi/full/10.1080/01441647.2016.1200156>

¹⁶ Page 2, Chapter 7, ‘7.1.4 Basic construction requirements’, *London Cycling Design Standards*, Transport for London, 2016: <http://content.tfl.gov.uk/lcnds-chapter7-construction.pdf>

¹⁷ Ibid.

¹⁸ Page 8, Ibid.

Station Front proposals: Objection

7 June 2019 - Ref: 19/00535/FULM



- i. It will be dangerous in its own right, prone to causing cyclists to skid, lose control and suffer injury as a result;
 - ii. The riding quality of the segregated cycleways will be noticeably bumpier than the “buff road surface” of the main carriageway, thus making the segregated cycleways less inviting than the main carriageway. That in turn will decrease the numbers of those willing to cycle this route while placing those who do cycle on the main carriageway at greater risk of colliding with heavy motor vehicles such as buses.
13. We therefore strongly object to the choice of stone setts as the surface for the segregated cycleways in this scheme, and ask that you direct that asphalt be used instead. As the London Cycling Design Standards make clear, “in conservation or other sensitive areas... natural stone-coloured asphalt concrete can be used.”¹⁹ For the same reasons of safety, we ask that you direct that the vehicular access route (that cyclists are expected to use) across Tea Room Square also be paved with asphalt, not stone setts. Indeed, construction and design of these segregated cycleways should be in line with the London Cycling Design Standards in all aspects.

Putting highway users at greater risk of injury or death increases the legal risk to the City of York Council

14. The issue of liability in the event of accident is not to our knowledge a material consideration in determining planning applications, but nevertheless we think it is a point worth making for members of the Planning Committee. That is, knowingly providing infrastructure (whether in design or construction materials chosen) that puts highway users at greater risk of injury than other infrastructure options could increase the risk to the City of York Council of being successfully sued for public liability in the event of an accident. But doubtless the Council’s legal officers will be able to advise further on this point.

C. Cycle parking requirements

15. Paragraph 4.1.9 of the application’s Transport Assessment states that “Cycle parking will be retained in its current location in the North and South Train Sheds. Cycle parking at George Stephenson House will also be relocated but retained within the confines of George Stephenson House to the east of the City Wall.”²⁰ In other words, no increases in cycle parking are proposed. That is simply unacceptable to us, not just because it contravenes national and local planning policy (e.g. paragraph 104(d) of the NPPF which calls for the provision of “supporting facilities like cycle parking) in failing to prioritise cycle access to developments, but also because it fails to accommodate the increasing numbers of people travelling by rail. As Network Rail report, “Passenger numbers grow by six per cent each year and will double in the next 25 years”²¹. We therefore echo the comments of the City of York Council Highways’ team on this matter by calling for the scheme provide significantly more cycle parking, not simply maintain existing levels.²²

¹⁹ Page 11, ‘7.2.5 Coloured surface treatments’, Ibid.

²⁰ Page 30, 4.1.9, ‘Cycle Parking’, *York Station Frontage Transport Assessment*, City of York Council.

²¹ ‘Passengers’, Network Rail: <https://www.networkrail.co.uk/communities/passengers/>

²² Page 2, Vergereau, H, ‘Station Frontage Full Application DC comments’, City of York Council, 13 May 2019.

D. Cycle access requirements

16. Just as it is vital that the proposed development provide sufficient cycle parking to accommodate higher levels of people choosing to cycle to and from the station, so too must cycle access to and from the station be improved. This is particularly the case for access to and from the newly upgraded Scarborough Bridge which has already seen the numbers of people using it every day increase by more than 30%²³. Again thus we echo the calls of the City of York Council Highways' team for cycle access between the station and existing nearby cycle infrastructure such as Scarborough Bridge, to be improved.

E. Making the application for development more sustainable in planning terms

17. We have addressed the physical risk to cyclists and other highway users presented by these proposals first and foremost in this objection because in our view it is the most pressing issue to highlight and rectify if this planning application is to be acceptable under paragraphs 108 and 109 of the NPPF. As we have argued, the evidence clearly shows that an asphalt-paved off-road cycleway northbound on Queen Street is the best way to rectify this risk to all users. But an off-road cycleway would also double cycling levels, boosting the sustainability of the development proposed and therefore its acceptability under national and local planning policy. As you will be aware, the submitted City of York Local Plan policies are relevant to this application under paragraphs 48-50 of the NPPF. We outline the improved sustainability that the application would enjoy through increased levels of cycling in the next paragraphs.

Promoting healthy and safe communities

18. Paragraph 91(c) of the NPPF states that "planning policies and decisions should aim to achieve healthy, inclusive and safe places which... enable and support healthy lifestyles... for example through the provision of ... layouts that encourage walking and cycling."²⁴
19. This is backed up by the City of York Council's submitted Local Plan policy D1 (Place making), which says that "development proposals should.... Promote ease of public pedestrian and cyclist movement... Spaces and routes must be attractive, safe and uncluttered and clearly prioritise pedestrians and cyclists over vehicles."²⁵
20. As we have set out, the proposed provision of an on-street parking bay means that an asphalt-paved off-road cycleway is undoubtedly safer for cyclists than an on-road cycleway, thereby meeting the requirements for such safety contained in paragraph 91 of the NPPF and submitted Local Plan policy D1. The doubled cycling levels generated by such an off-road cycleway would also boost the health of York's residents in other ways, such as enabling more people to enjoy greatly reduced chances of developing serious diseases like cancer and heart disease²⁶.

²³ 'More than 1,000 extra daily journeys on York's new Scarborough Bridge', City Connect, 29 May 2019: <https://cyclecityconnect.co.uk/news/more-than-1000-extra-daily-journeys-on-the-new-scarborough-bridge/>

²⁴ Page 27, *National Planning Policy Framework*, Ministry of Housing, Communities and Local Government. Her Majesty's Stationery Office, 2019.

²⁵ Page 146, 'Policy D1: Placemaking', *City of York Local Plan - Publication Draft*, February 2018

²⁶ 'Cycling to work: major new study suggests health benefits are staggering', *The Conversation: Academic rigour, journalistic flair*, April 2017: <https://theconversation.com/cycling-to-work-major-new-study-suggests-health-benefits-are-staggering-76292>

Station Front proposals: Objection

7 June 2019 - Ref: 19/00535/FULM



Promoting sustainable transport

21. Paragraph 108(b) of the NPPF states that “In assessing... specific applications for development, it should be ensured that... safe and suitable access to the site can be achieved for all users.”
22. Paragraph 110(a)-(c) of the NPPF states that: “Within this context, applications for development should:
 - i. Give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second - so far as possible - to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage transport use;
 - ii. Address the needs of people with disabilities and reduced mobility in relation to all modes of transport;
 - iii. Create places that are safe, secure and attractive - which minimise the scope for conflicts between pedestrians, cyclists and vehicles...”
23. Submitted policy T1 (Sustainable Access) of the City of York Local Plan builds on this by requiring that development proposals demonstrate the provision of “suitable access... for a range of transport modes whilst giving priority to pedestrians (particularly those with impaired mobility), cyclists and public transport services” and that “create safe and secure layouts for motorised vehicles (including public transport vehicles), cyclists, [and] pedestrians that minimise conflict.”²⁷
24. By providing infrastructure for cyclists that removes them from harm’s way, an asphalt-paved off-road/segregated cycleway northbound from the junction with Blossom Street would both prioritise cycling over motor traffic and do so in a safe, accessible manner.

Planning for climate change

25. Paragraph 150(b) of the NPPF states that “new development should be planned for in ways that... can help to reduce greenhouse gas emissions, such as through its location, orientation and design.”
26. Cycling has a far lower carbon footprint per km than even fully electric vehicles charged by the current power mix in the UK²⁸. Enabling more cycling by providing an off-road cycleway on Queen Street would therefore be altering the design of the proposed development to markedly reduce the greenhouse gas emissions of these people’s transport choices compared to if they had chosen to drive. In other words, the doubling of cycling levels that would result from an asphalt-paved northbound off-road/segregated cycleway on Queen Street would ensure this application better complied with paragraph 150 of the NPPF.

Improving air quality

27. Paragraph 181 of the NPPF states that “planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones... Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel

²⁷ Pages 210-211, ‘Policy T1: Sustainable Access’, *City of York Local Plan - Publication Draft*, February 2018

²⁸ ‘How Much CO2 does cycling really save?’, *European Cyclists Federation*, July 2013: <https://ecf.com/news-and-events/news/how-much-co2-does-cycling-really-save>

Station Front proposals: Objection

7 June 2019 - Ref: 19/00535/FULM



management.” As the City of York Local Plan Publication Draft makes clear, Queen Street lies within a designated Air Quality Management Area, making any measures in applications for development that might improve air quality, particularly important²⁹.

28. Similarly, Policy ENV1 (Air Quality) of the submitted City of York Local Plan directs that “development will only be permitted if the impact on air quality is acceptable and mechanisms are in place adverse impacts and prevent further exposure to poor air quality.”³⁰
29. As paragraph 12.2 of the submitted City of York Local Plan says, “the main source of air pollution in York is traffic.” By contrast, cyclists are practically zero-emission, with the only possible pollutants - PM10, from brake and tyre wear - being generated at a far lower level than motor vehicles due to the much lower mass and velocity of cyclists compared to motor vehicles. So every person enabled by safe cycle infrastructure to cycle is actively helping to reduce air pollution by not driving. In short, an asphalt-paved off-road/segregated cycleway northbound on Queen Street would help this application better meet paragraph 181 of the NPPF and policy ENV1 of the submitted City of York Local Plan.

Conclusion

30. Implemented correctly, the Station Frontage proposals could bring significant benefits to York through improved sustainable transport facilities. This would help ensure that York was well-placed to tackle the challenges of the present and the future: an ageing population, rising levels of physical inactivity, air pollution, social isolation and the need to move quickly to a zero carbon economy. Unfortunately as presently conceived, these proposals do not do this due to faults in highway design and constructions that endanger rather than enable highway users, particularly cyclists. They also fail to give sufficient guarantees that appropriate levels of cycle access and parking will be provided. We therefore object to the proposals as they stand on the grounds of unacceptable impacts on highway safety and access, asking that these deficiencies be remedied to ensure this application for development can be made compliant with national and local planning policy.
31. To remedy these deficiencies therefore, firstly we urge you to recommend the proposed northbound on-road advisory cycle lane on Queen Street be moved to the pavement, making it a segregated cycleway and greatly reducing the risk of injury to users of this part of the highway. Secondly, we ask that the surfacing material used for the segregated cycleways be asphalt rather than stone setts, in line with the London Cycling Design Standards. Stone setts could render the segregated cycleways slippery and unstable for cyclists, dissuading the use of these segregated cycleways. Thirdly, we echo the calls from the City of York Council Highways team for increased provision of cycle access and parking as part of the scheme. And finally, we point to the range of different ways that a doubled rate of cycling would boost the sustainability of the development in terms of reduced air pollution (in a designated Air Quality Management Area), physical inactivity and carbon emissions. These wider benefits will be critical if the new development is to meet the forecast needs of York in 5-10 years time when construction might be expected to be complete. And those benefits will only be accrued if cycle access is prioritised and made safe in the ways we have prescribed.

²⁹ Page 194, 'Figure 12.1: Air Quality Management Areas (AQMAs) in York', *City of York Local Plan - Publication Draft*, February 2018

³⁰ Page 192, 'Policy ENV1: Air Quality', *City of York Local Plan - Publication Draft*, February 2018.