



BICESTERBUG

B i c e s t e r B i k e U s e r s G r o u p

Submissions On Proposed Planning Application: 21/01224/OUT / 'Experience Quarter'

**25 May 2021
Version 3.1**

1. INTRODUCTION

1. The applicant should be commended for its apparent commitment to encouraging walking and cycling within its proposed development. However, the proposed the access arrangements to the development are poor and non-compliant with national and local policies. They will not enable walkers and cyclists to access the site.
2. There has been no engagement by the applicant with users that would comply with LTN 1-20 and as required to demonstrate compliance with the public sector equality duty contained in the Equality Act 2010 (DFT 2020, 10.4.17). While there was a meeting between the applicant and BBUG earlier in 2021, this was after the transport plan had already been completed, and no details of the applicant's transport plan were shared with BBUG at that time. Aspects of the design make very poor provision for the partially sighted, and are likely to breach the public sector equality duty.
3. The designer also fails to refer to or apply relevant guidance, including those considered a 'material consideration' in planning decisions. Key guidance that the applicant makes no reference to nor an attempt to comply with is the Department for Transport's (DfT) 2020 Local Transport Note 1/20. Other guidance that the applicant does not reference or seek to comply with are the Oxfordshire County Council ('OCC') Cycling Design Standards and the OCC Bicester Local Walking and Cycling Infrastructure Plan (2020).

4. The planning application for the proposed development does not appear to have been undertaken by a designer with an appropriate level of experience and training in designing for active travel as required by LTN 1-20 (DfT 2020, 1.1.3).
5. For these reasons, BBUG currently objects to the application.

2. GENERAL ACCESS / BUCKINGHAM ROAD JUNCTION

6. The proposed 'Experience Quarter' development at Bicester Heritage will, if approved, lead to a significant increase in visitors. It would be feasible for the majority of those visiting from Bicester to access the site on foot or bike given the proximity of the proposed site to the town, and the compact nature of the town. The vast majority of the population are less than 2 miles from the site. OCC has also committed to tripling the rate of cycling in Bicester (OCC 2020, 7). The applicant should be commended for seeking to encourage walking and cycling on the site itself, though the proposals are currently vague.
7. However, the key obstacle is access to the site across the 50mph Bicester Ring Road (that may be dualled in due course) and the 50mph A4421 Buckingham Road North. All active travellers will need to navigate or avoid the very problematic junction between these two roads, where the provision is poor, dangerous, and inconvenient. Currently access is envisaged across this junction by unprotected and uncontrolled crossings over as many as three lanes of high-speed motor-vehicle traffic. This will discourage the vast majority of visitors from visiting by foot or by bike.
8. LTN 1/20 now emphasises that the planning authority should ensure that highway improvements are made that will enable cycle access to the site through upgrading existing highways:

'Cycling facilities should be regarded as an essential component of the site access and any off-site highway improvements that may be necessary. Developments that do not adequately make provision for cycling in their transport proposals should not be approved. This may include some off-site improvements along existing highways that serve the development.' (Emphasis added, DfT 2020, 14.3.12).
9. In order to accommodate active travellers, the junction needs to be reviewed to accommodate the demands of the proposed site while ensure compliance with the principles of coherence, directness, and safety (DfT 2020, 1.5.2). Ideally this would be

along the lines of the 'CYCLOPS' junction as is being considered at the neighbouring Banbury Road junction. This would avoid the challenges of high-speed roundabouts for active travellers. Potential solutions would include grade separation or so-called Dutch or other protected crossings. The applicant should be required to make a reasonable contribution towards ensuring that junction serves its planned development.

3. A4421 NORTH / BUCKINGHAM ROAD (MAIN ACCESS)

3.1 Western Side of A4421 Buckingham Road North

10. The applicant argues that the walking and cycling provision along the western side of the A4421 Buckingham Road North is sufficient, and it proposes to make no changes. However, the provision in this area is very poor, consisting of a narrow, shared and unsegregated cycle and pedestrian path, with no priority over minor roads. None of this complies with national or local guidance.
11. Shared use facilities can create particular difficulties for visually impaired and other disabled people. Interactions between people moving at different speeds can be perceived to be unsafe and unpredictable, particularly by vulnerable pedestrians. This negatively affects comfort and directness and may amount to a breach of the public sector equality duty contained in the Equality Act 2010. The DfT strongly advises against shared use footways (DfT 2020, 1.6.1, 6.5.4 & 9.4.1). The DfT further requires that at crossings and junctions, cyclists should not share the space with pedestrians, but should be provided with a separate, parallel, route (DfT 2020, 1.6.1). The local, Oxfordshire, county guidance also requires that off-carriageway facilities for pedestrians and cyclists should be fully segregated (OCC 2017, 2.1.3, 2.2.8, 3.4.6). Finally, the OCC Cycle Design Standards require that shared use facilities must not be provided along spine roads such as the A4421 Buckingham Road North (OCC 2017 2.2.8).
12. Furthermore, the very narrow width of the existing path is woefully non-compliant with current standards. Current OCC standards require 3.5m where there is sufficient space (OCC 2020, 20-21).
13. Additionally, LTN 1/20 specifies a desirable minimum horizontal separation of 2m on a 50mph road, and an absolute minimum of 1.5m (DfT 2020, Table 6-1).
14. Finally, the current provision does not give priority to cyclists over minor junctions as required by multiple standards. Giving way is no longer recommended because it conflicts with the

overarching principles of directness, safety, and comfort (DFT 2020, 1.5.2). Because of the effort required to stop at every minor road, cycle users will be encouraged to cycle in the main highway, which is less safe (DFT 2020, 4.2.7 and Figure 1.1). Each unnecessary stop saps energy equivalent to cycling an additional 100m (CROW 2017, 133). Current guidance deprecates layouts which make cyclists stop or slow down unnecessarily (DFT 2020, 4.2.7 and Tables 4-1 and 10-11). As the DFT points out:

'In urban areas, where protected space separate from the carriageway is provided for cycling, it is important to design priority junctions so that wherever possible cyclists can cross the minor arms of junctions in a safe manner without losing priority. This enables cyclists to maintain momentum safely, meeting the core design outcomes of safety, directness and comfort' (DFT 2020, 10.5.7).

The local Oxfordshire county guidelines echoes this point stating:

'Good design including adequate space and priority for cycle users is needed to ensure cycle users feel safe and cycle journeys are direct and convenient.' (OCC 2017, 2.2.5)

And:

'Priority for cycle users at side road junctions is critical.' (OCC 2017, 2.2.8).

The Bicester Local Walking and Cycling Infrastructure plan, now in force, also requires that priority is given to a cycle path where it crosses a road (OCC 2020, 20).

15. To comply with current guidance, this application should be refused unless the applicant provides segregated cycle and pedestrian provision of adequate width, with horizontal separation from the carriageway, and priority over minor junctions.

3.2 Proposed New Crossing of the A4421 Buckingham Road North

16. The applicant proposes a new uncontrolled crossing over a high-speed road, well to the north of the main entrance to the proposed site and well away from the desire line.
17. Guidance in LTN 1/20 specifies that an uncontrolled crossing over a 50mph high-speed road would be 'suitable for few people and will exclude most potential users and / or have safety concerns'. The recommended solution here would be grade separation or a signal-controlled crossing (DfT 2020, Table 10-2).

Of the two options, a signal-controlled crossing is likely to be the most cost effective and practical.

18. Furthermore, pedestrian and cycle crossings should not be situated at a distance from desire lines as this falls foul of the requirements of directness (DfT 2020, Table 10-1).
19. Given the above, suitable provision would consist of a signal-controlled crossing close to, or ideally opposite, the proposed entrance. Given the applicant's suggestion of a ghost island, a pedestrian and cycle island could be used to facilitate a pedestrian and cycle crossing to the main entrance.

3.3 Eastern Side A4421 Buckingham Road North

20. The eastern side of the A4421 Buckingham Road North is a key connection between the site, Bicester Town, and the villages from the north such as Stratton Audley. The A4421 Buckingham Road North is a busy high-speed road that is not suitable for pedestrians and would exclude the vast majority of cyclists.
21. The minimum that would be required here would be cycle and pedestrian provision between the Bicester Road and the Bicester ring road along the frontage of the proposed site that complied with the current standards set out above, ie segregated, of acceptable width, with horizontal separation from the carriageway, and with priority over minor roads such as the site entrance.

4. A4421 EAST / SKIMMINGDISH LANE

22. While the applicant emphasises that the main access to the site will be located on the A4421 Buckingham Road North, there are currently existing access points to the site on the A4421 East / Skimmingdish Lane. It is inevitable that these will be used at times as alternative, secondary, or emergency access points. It is also foreseeable that pedestrians and cyclists will want to access in both directions along the frontage of the proposed site in this area. It is therefore important that these access points are also connected to the walking and cycling network because the carriageway of the high-speed ring road is completely unsuitable and unsafe for pedestrian or cycle use.
23. Currently, the only route between the A4421 Buckingham Road North and the other access points would be to unnecessarily cross over the junction of the Buckingham Road and Bicester Ring Road at an uncontrolled crossing, proceed along the south side of the A4421 East / Skimmingdish Lane for some considerable distance

east past the other entrances, cross back over the Bicester Ring road, and then proceed back west along a non-compliant shared path with no horizontal separation from the high-speed traffic.

24. LTN 1/20 emphasises coherence of the pedestrian and cycle network. In order that those on foot and cycle will be able to safely access the other entrances to the site, it is important that a short length of cycle and pedestrian path that comply with the current standards as set out above is provided along the frontage of the proposed site, ie along north side of the A4421 East / Skimmingdish Lane between the junction and the other access points to this site.
25. Finally, given the lack of a protected or controlled crossing at the roundabout at the corner of the proposed site, it is important that a controlled crossing be provided across the A4421 East / Skimmingdish Lane to the east, unless this has been committed as part of previous planning applications. Such a crossing would provide for walkers and travellers from the east who would otherwise only be able to access the site via a very indirect and circuitous, or a very unsafe and unwelcoming uncontrolled crossing.

5. REFERENCES

Department for Transport (2020), Local Transport Note 1/20
CROW (2017), Design Manual for Bicycle Traffic
Oxfordshire County Council (2020), Local Walking and Cycling Plan for Bicester
Oxfordshire County Council (2017), Cycle Design Standards