



# Bristol Parks Forum

representing resident led park groups and citywide organisations involved in protecting and improving Bristol's green spaces

## **Planning Application 16/06497/F**

Improvements to a walking and cycling route, comprising; intelligent LED lighting, operating at standard brightness until 7pm, with reduced output thereafter unless activated by movement sensor; re-instatement of historic gateways at 2no entrances; 155m approx. new path; 645m approx. path reconstruction to widen and improve path drainage.

**Bristol Parks Forum strongly objects to this application as currently proposed.**

Bristol Parks Forum represents park groups throughout Bristol. Collectively we represent many volunteers working to support Bristol City Council to enhance and protect the city's parks for use & enjoyment by everybody.

We are responding to this application because it raises issues that impact on parks and park users across the city.

In general we support the ambitions of the Council and others to increase the use of sustainable transport such as cycling and to decrease car use. We agree that improved segregated cycle routes are an important part of this strategy.

It appears to us that in the desire to get these routes constructed insufficient consideration is being given to their impact on local residents and the environment; this is particularly true where these routes are proposed in parks.

Improving people's health, reducing pollution and improving the environment are the reasons we and others support increased cycling, but these are the same reasons we care so passionately about our local parks. We want to see our local parks improved and measures taken to encourage their use. The health benefits to people of all ages of visits to their local park are well documented.

In our view the construction of this cycle path will discourage use of the park as it introduces another barrier to be crossed to get into the park (which will particularly impact older residents) and an additional hazard to park users (eg children running after errant footballs crossing the path).

Our strong preference is for cycle routes through parks to be used very much as a last resort and only where on highway options have been found to be absolutely unworkable.

We note that the majority of the Filwood Quietway will be on the highway, we do not believe that a suitable route on the highway cannot be found for this section.

### **Segregated Path & Conflict with Park Users**

In principle we agree that segregation of cycle routes from pedestrians as well as from motor vehicles is desirable. The proposed plans however do not provide a segregated path; it is only partial segregation.

It is not possible to construct a truly segregated path within a park without using fencing, hedging or similar. A park is by its nature a shared space, using signage or coloured surfacing does not prevent children or others running across the path while playing games etc. nor does it prevent dogs (whether or not they are on lead) straying on to the path. Segregation in the context of a park would mean segregation from all other park users not just pedestrians choosing to follow the same route.

The partial segregation proposed in our view gives the worst of both worlds, it will give cyclists the perception that they have right of way and therefore can proceed at higher speeds, while not protecting other park users. The proposals are likely to increase the risk of injury from person/cycle collisions rather than reduce it compared to a shared path.

We note the intent to introduce signage and colour bands on the approach to junctions, this seems to us to be an acceptance that the proposed design is going to introduce a problem that needs to be addressed. This is similar to the situation we have on highways, where wide smooth roads are built and then traffic calming has to be introduced to reduce speed.

A better solution, if a route cannot be found on the highway, would be for a shared path. We note that this is the policy in other areas, for example in London, the Royal Parks ‘Cycling in the Royal Parks Policy Statement 2016’ says:

‘The Royal Parks has employed shared-space design approach in many locations. This aims to provide design cues that help visitors understand the expected behaviours for themselves and others using the spaces.’

Any shared path should of course be carefully designed to avoid conflict, especially where crossing other paths – eg the use of the equivalent of staggered cross roads, so that cyclists have to deviate from the straight course to cross the path.

In our view the current plans should be refused because they introduce unnecessary risk to other park users.

### **Open Entrances**

We support the removal of barriers to access to parks. However illegal use of parks by motorcycles is a real concern and continues to be a problem in many parks and open spaces. In addition barriers or chicanes at entrances do act to slow cyclists entering or leaving the park. We urge that further consideration is given to the design of the entrances, both inside the park and on the highway to ensure that cyclists cannot enter the park at excessive speeds.

We note that it is intended that the removal of the A-frames and gates is intended to be a 12-month trial. We are aware that VPAG have concerns about this, but do not object in principle to a trial of more open access, provided there is a clear commitment (including of ring-fenced

funds) to reinstate these barriers if motorcycles become a problem in the future. This commitment should also extend for a longer period than 12 months.

To this end we believe that, if this scheme is given approval, then a condition should be imposed that a fully costed design for the reinstated barriers (to prevent access by motorcycles) should be produced and evidence given that the funds are ring-fenced prior to any construction commencing. The ring-fenced money should be available for a minimum of 5-years so that the barriers can be installed at any time over that period if a problem with motorcycles becomes evident.

## **Planning Policy Considerations.**

### **Historic Parks & Gardens**

Victoria Park is an important historical asset for the City of Bristol. Planning Policy DM31 states in respect of Registered Historic Parks & Gardens:

‘Development will be expected to have no adverse impact on the design, character, appearance or settings of registered historic parks and gardens and to safeguard those features which form an integral part of their character and appearance.’

The access statement notes that current path widths are relatively narrow; this is a feature of the park. Comparisons with areas such as Queen’s Square where the paths were designed to be wide and more akin to carriage drives do not bear scrutiny.

We believe that the construction of the 4.7m to 4.3m wide path around three sides of the park will have a serious negative impact on the character, appearance and setting of the park. The proposed development therefore fails this test and should be refused on these grounds.

The proposed lighting will also alter the character of the park, we would urge that if the scheme proceeds in any form then alternatives such as ground level lights to mark the route are considered.

### **Green Infrastructure & Important Open Space**

Bristol’s Local Plan was established through many years and stages of consultation, followed by inspection by a Government appointed Inspector and consideration by Full Council in 2014. Protection of Green Infrastructure is an important part of the Plan.

The plan designated areas of land in Bristol as Important Open Space to be protected from development. The Important Open Space designation applies to many of Bristol’s publicly accessible parks and green spaces.

Having gone through this process, it is important to us that the designation should be respected and upheld in any planning decision. Permitting any development on any part of an area designated as Important Open Space would set a precedent and would be unacceptable.

Development Management Policy DM17 is very clear:

“Development on part, or all, of an Important Open Space as designated on the Policies Map will not be permitted unless the development is ancillary to the open space use.”

It adds at clause 2.17.3:

“Important open spaces with a role and value for recreation, leisure, community use, townscape, landscape or visual amenity quality are designated and shown on the Policies Map and protected from development.”

The area proposed for this development is designated as Important Open Space and should therefore be protected from development.

While improvements to paths (including measures to reduce pedestrian / cycle conflict) and entrances to the park would be considered to be ‘ancillary’ to the open space use; we do not believe that this applies in this case.

Despite the spin put on these proposals in the Council’s press release and the Design & Access statement. This proposal is not aimed primarily at improving the park; it is aimed at constructing a new transport route through the park. The route is not for the benefit of park users, it is the ‘Filwood Quietway’ and is for the benefit of those who want to get from one side of the park to the other and from Filwood Park and Hengrove to the City Centre.

Construction of this route is not ancillary to the open space it is in effect removing a section of the open space and preventing the use of adjacent areas as open space; the proposed development should be refused on these grounds.

### **Construction Timing**

Any justification for construction of this cycle route, either financially or in terms of its impact on the environment is dependent on it being part of the overall Filwood Quietway scheme.

However, the design and necessary permissions for the remainder of the route are not yet in place, indeed it seems that the final route for some sections is not yet agreed.

If this application is approved then we strongly request that a condition is applied that the remainder of the route has to be fully agreed and any permissions for its construction in place prior to work commencing on the Victoria Park section.

### **Further Comments**

Many park group members are cyclists, and it is unfortunate that this application has appeared to create a ‘them and us’ situation with cyclists vs park users. In many cases this is really ‘us against us’ since we are all aiming to improve the environment and the overall health of Bristol’s residents.

Bristol Parks Forum committee are willing to meet at any time to try and reach an agreed approach on the Filwood Quietway and other cycle routes that may impact on parks in the City.

### **Bristol Parks Forum Committee**

[www.bristolparksforum.org.uk](http://www.bristolparksforum.org.uk)  
[info@bristolparksforum.org.uk](mailto:info@bristolparksforum.org.uk)  
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