

22nd December 2025

RE: **25/02252/FUL** – retrieved from <https://planningaccess.york.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=T5KNFYSJHPY00>

Construction of a new pedestrian and cycle bridge with associated infrastructure following demolition of existing bridge Wilton Rise footbridge

From Anne Norton on behalf of York Disability Rights Forum, c/o Centre for Applied Human Rights, 6 Innovation Close, York YO10 5ZF

York Disability Rights Forum would like to make the following objections with regard the plans for the Wilton Rise Footbridge.

Design and Access Statement:

"The majority of the population identify as being in good health, with less than 10% identifying as having long-term disabilities, and a slightly higher demographic identifying as a little limited by disability" (p.62)

YDRF Comments and reasoning:

The % of population should be irrelevant (and we anyway dispute its accuracy) in line with the 3 aims of the Public Sector Equality Duty:

- eliminate unlawful discrimination, harassment, victimisation and any other unlawful conduct prohibited by the act
- advance equality of opportunity between people who share and people who do not share a relevant protected characteristic
- foster good relations between people who share and people who do not share a relevant protected characteristic

In addition, the potential needs of the future aging population have not been addressed.

"According to the ONS's population projections, by 2072 this could rise to 22.1 million people, or **27%** of the population."

(<https://commonslibrary.parliament.uk/the-uks-changing-population/>)

Design and Access Statement:

"Positive impacts and inclusive design measures: 'wide circulation space (4m) accommodates shared use by pedestrians and cyclists, promoting safe movement.' (p.63)

"Unsegregated shared use: CD353 Table 11.7 recommends a minimum of 3.5m for shared pedestrian/cycle paths. The 4m provision exceeds this" (p.64)

YDRF comments and reasoning:

The width of the space does not promote safe movement of pedestrians and cyclists, in particular affecting people with impairments. Please see extracts from the Inclusive Mobility and LTN 1/120 document extracts at the end of our comments.

In addition, at a consultation meeting with the York Access Forum (which some of our YDRF group attended) it was strongly recommended by them that a segregated space be used, which we believed to have been accepted at the time and has now been completely ignored without sufficient reason.

One of our group who is a regular user of the Millennium Bridge knows what a nightmare it is to navigate since the segregation was removed. They know of no-one who thinks that was an improvement – walkers, wheelers and cyclists move haphazardly across it and there are numerous close shaves. For example, too many cyclists do not slow down or dismount.

Full Planning Statement & Statement of Community Involvement:

"There was an understanding that Inclusive Mobility Guidance allows for shared spaces in certain circumstances and that the proposal meets this criterion" (p.18)

YDRF comments and reasoning:

We would disagree that early engagement with 'disabled' groups has been undertaken (as required under LTN 1/20 p67 – see below).

"6.5.5 Where a shared use facility is being considered, early engagement with relevant interested parties should be undertaken, particularly those representing disabled people, and pedestrians and cyclists generally. Engaging with such groups is an important step towards the scheme meeting the authority's Public Sector Equality Duty." (LTN 1/20, p.67)

In addition, very short notice has been given for comments to this proposed plan. We are not aware that any disabled group other than the York Access Forum has been consulted. And despite York Access Forum being consulted (see above), their recommendations (in particular, segregated space) have been ignored.

"6.5.6 Shared use may be appropriate in some situations, if well-designed and implemented." (LTN 1/20, p.67/68)

None of the listed situations apply to the design of this footbridge and the design does not include recommendations from the Inclusive Mobility Guide. Therefore we would argue that it is not well-designed.

Full Planning Statement & Statement of Community Involvement:

A level difference to show segregation (if proposed) would not be supported as it poses a hazard (p.19)

YDRF comments and reasoning:

There are other options to a change in level, which have not been addressed:

8.2.4 "Where there is insufficient space to separate the pedestrian and cycle paths, a level difference (preferably 60mm or more) **and/or different surface texture** should be used to **clearly indicate separate surfaces intended for either cycle or pedestrian use**, as discussed in Section 6.2." (LTN 1/20 p.84)

In addition, a kerb has been included in the design of the approach to the new entrance to York Central. Was this considered a hazard?

Full Planning Statement & Statement of Community Involvement:

"2.4 Precedents" (p.21)

YDRF comments:

The precedent of previous designs should not negate the opportunity for using existing guides for inclusive design (LTN 1/20 and Inclusive Mobility) and for future proofing for the ageing population.

And where is the evidence to show that the previous designs have been successful and safe?

Full Planning Statement & Statement of Community Involvement:

4.3 Access arrangements and 5.6 Gradients and landing points (p.49)

"*Landings are incorporated at key points along the bridge – particularly at corner transitions where the route changes direction...*" (p.32)

YDRF Comments and reasoning:

The landing points are inadequate. There should be a 2m landing for every 500mm rise in gradient. The design includes a 62m and a 73m straight run without landings included. In addition, two of the landings are placed on bends which creates hazards for disabled and older pedestrians. We doubt that consideration been given for cycling stopping distances when a pedestrian emerges from a landing space situated on a bend.

"A level landing should be provided for every 500mm that the route rises." (Inclusive mobility p.29)

"Mass cycling requires routes that are accessible to all, and this includes ensuring that the cycle infrastructure does not create hazards that will deter pedestrians." (LTN 1/20 p.15)

"**5.7.1** Stopping Sight Distance (SSD) is the distance required for a rider to perceive, react and stop safely." (LTN 1/20, p.44)

General YDRF comments:

We would like to draw your attention to pertinent points taken from the following documents for guidance in inclusive design:

Inclusive mobility – A guide to best practice on access to pedestrian and transport infrastructure. London: DTLR Mobility and Inclusion Unit, 2002.

4.6

“Local Transport Note 1/20 is clear that shared use routes in streets with high pedestrian or cyclist flows should **not** be used.... **Cycle tracks and footways should be designed to be perceived as wholly separate facilities.** Where it is not possible to achieve this level of separation, and the footway and cycle track are immediately adjacent and parallel to one another, the **guidance** in this section should be followed. This will assist **vision impaired people** and will also be helpful to all other users.” (p.32)

6.4

“Local Transport Note 1/20 (Cycle Infrastructure Design) is clear that **shared use routes** in streets with high pedestrian or cyclist flows should **not be used.**”

“The purpose of the central delineator strip is to help **vision impaired** people, other users, and cyclists keep to the correct side. A kerb at least 50mm high or a strip of light-coloured material that can be detected with a cane is likely to be more effective at helping **visually impaired people** to detect and negotiate the track.” (p.66)

7.5

Signing for cycle facilities is prescribed in TSRGD (2016). Design guidance is provided by the Traffic Signs Manual. A key recommendation is that **signs should be positioned so they are visible for all cyclists, including recumbent cyclists**, whose eye level will be lower. (p.73)

Local Transport Note 1/20 (Cycle Infrastructure Design)

6.2.33 “Tactile paving should be applied wherever footways/footpaths cross cycle tracks. It is important at transitions to carriageways where a cycle track merges or diverges from carriageway level to footway level (see Chapter 9) so that **visually impaired people** do not inadvertently follow the cycle track into the carriageway. Detailed advice is contained in Guidance on the Use of Tactile Paving Surfaces.” (p.58)

6.5.4 “**Shared use facilities** are generally **not favoured** by either pedestrians or cyclists, particularly when flows are high. It can create particular difficulties for **visually impaired people**. (p.67)

8.2.4 “Where there is insufficient space to separate the pedestrian and cycle paths, a level difference (preferably 60mm or more) and/or different surface texture should be used to **clearly indicate separate surfaces intended for either cycle or pedestrian use**, as discussed in Section 6.2.” (p.84)