

***Bristol Walking Alliance (BWA) is pleased to see that the Bristol City Pavement Licensing Policy is being updated. We comment on those aspects which are particularly important for pedestrians.***

*Bristol Walking Alliance is a consortium of organisations and individuals campaigning to improve Bristol's walking environment. We want to create an environment for pedestrians that is welcoming, safe, convenient and inclusive.*

*We use 'walking' and 'pedestrian' to include all people moving at walking speed, including those who use wheelchairs, mobility scooters or other aids to movement.*

## **Summary**

The key aspects of the Pavement Licensing Policy that affect pedestrians relate to ensuring that pavements remain wide enough for easy travel, including for those using mobility aids, and that any licensed use does not cause a pavement obstruction. We think that the policy should be based on the minimum unobstructed width prescribed by government guidance. We also expect to the Policy to address how it will be enforced.

## **Unobstructed width**

The proposed policy states that *'the minimum 1800mm is required between any obstacle and the edge of the footway'*. We do not consider this to be sufficient for the following reasons:

- Government guidance on pavement licenses [1] states in Section 4.1 that *'under normal circumstances a width of 2000mm is the minimum that should be provided'*.
- The above is taken from the Government guidance on Inclusive Mobility [2] which in Section 4.2 also sets out the minimum width of 2000mm in order to allow two wheelchair users to pass each other.

The proposed policy also states that *'In exceptional circumstances the Council may permit a width of between 1500mm and 1800mm where this occurs over a short distance'*. This is presumably taken from the following:

- Government guidance on pavement licenses [1] states in Section 4.1 that *'A minimum width of 1500mm could be regarded as the minimum acceptable distance between two obstacles under most circumstances'*.
- The above is taken from the Government guidance on Inclusive Mobility [2] which in Section 4.2 also sets out the minimum acceptable 1500mm in order to enable a wheelchair user and a walker to pass each other.

The policy refers to the *'edge of the footway'* as one limit on the width. However:

- The edge of the footway may be obstructed by street furniture such as bollards, lampposts and signposts.
- Passing traffic makes it unsafe for pedestrians to travel at the edge of the footway.

Instead, we urge the following changes to be made to the proposed policy (to the bullet point in Section 6.d) about the factors to be considered when determining width to be allowed:

*Whether an **unobstructed** width of more than the minimum ~~1800~~**2000**mm is required ~~between any obstacle and the edge of the footway~~. The Council may require more than the minimum, and in high footfall areas, or where there are specific access restrictions or considerations it is likely that a greater distance may be specified. In exceptional circumstances the Council may permit an **unobstructed** width of between 1500mm and ~~1800~~**2000**mm where this occurs over a short distance.*

## **Enforcement**

The Pavement Licensing Policy does not explicitly describe how the policy will be enforced.

One aspect of enforcement is having a clear description of when licensing conditions have not been met. For example, it must be clear whether a license has been granted based on the expected unobstructed width of 2000mm or greater, or whether there are special circumstances that have led to a reduced width between 1500mm and 2000mm being permitted.

Another aspect of enforcement is how infringements of the policy will be dealt with. For example, under what circumstances (such as repeated infringements) could a pavement license be revoked?

We would expect to see a section in the policy that deals with enforcement so that license applicants will be clear about their obligations and what happens if they are not met.

Bristol Walking Alliance

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[1] **Pavement licenses: Guidance** (published 2 April 2024)

<https://www.gov.uk/government/publications/pavement-licences-guidance/pavement-licences-guidance>

[2] **Inclusive mobility: making transport accessible for passengers and pedestrians** (published 10 January 2022) <https://www.gov.uk/government/publications/inclusive-mobility-making-transport-accessible-for-passengers-and-pedestrians>