

20/0935/MRES Land At Pinn Court Farm Pinncourt Lane Exeter EX1 3TG

10th July 2020

Dear Planning Team,

Exeter Cycling Campaign objects to the proposed Pinn Court Farm Phase 2B development on grounds that the proposed cycling measures fall short of what is required in this area. If delivered as written, this development will bake in a high level of private car use with resultant impacts on congestion, air quality and Exeter and East Devon's Net-Zero plans.

Devon County Council and East Devon Council are both signatories to the Devon Climate Declaration, supporting action on the Climate Emergency. Devon County Council spawned the Devon Climate Emergency Project - "Creating a resilient, net-zero carbon Devon – where people and nature thrive."

Bloor Homes' vision for this development is:

"Our vision is to create a high quality, well connected urban extension, which adopts a green infrastructure led approach and embraces sustainability at all levels, providing an exceptional place for people to live, work and play."

Exeter Cycling Campaign welcomes a number of inclusions of cycling (and walking) considerations in this proposal, however the proposal fails to address some key priorities and as a result will bake in the private car as the primary form of transport.

The design and access statement principles state:

"4. Sustainable Transport: Encouraging walking and cycling and making public transport widely available to reduce social exclusion"

It is not sufficient to merely encourage walking and cycling, developments have a responsibility to enable these as primary forms of transport. This means developing and linking into high quality networks that connect real-life journeys including home to school, work and shops.

Exeter Cycling Campaign welcomes the identified opportunity of

"Provision of green streets with considerable tree planting and wide verges, separating the main carriageway from pedestrian and cyclist routes."

Within the design code on street hierarchy, the major access road design suggests a 3.5m shared surface is incorporated which encompasses a circular route of the site and connects into Phase 2A and the yet to be proposed Phase 3. Whist the Campaign welcomes this inclusion it notes that the detailed plans do not show this consistently. Thus there are concerns regarding the extent of the shared surface and where and how it joins in to the real routes residents will be taking.

There are no indications of cycle/walking priority crossings at the junctions or how safety will be maintained for these vulnerable users. Exeter Cycling Campaign expects all new developments to provide a safe way for all residents to cycle from their place of residence to where they need to get to (e.g. shops, school, work). Furthermore, a farm track is included in the plans but there is no indication of how travel by bicycle will be safely separated from any farm traffic.



These plans as they currently stand fall short of this expectation.

Crucially, Exeter Cycling Campaign notes that the Langaton Lane Link (LLL) has still not been delivered. This is a key mitigation in the Pinhoe Area Access Strategy (Figure 1) and currently the only mitigation for the Pinhoe area since the Exhibition Way Link was cancelled. This makes the LLL all the more pressing to be delivered as soon as possible, and certainly before the residential increases in Pinhoe and Westclyst are continued.

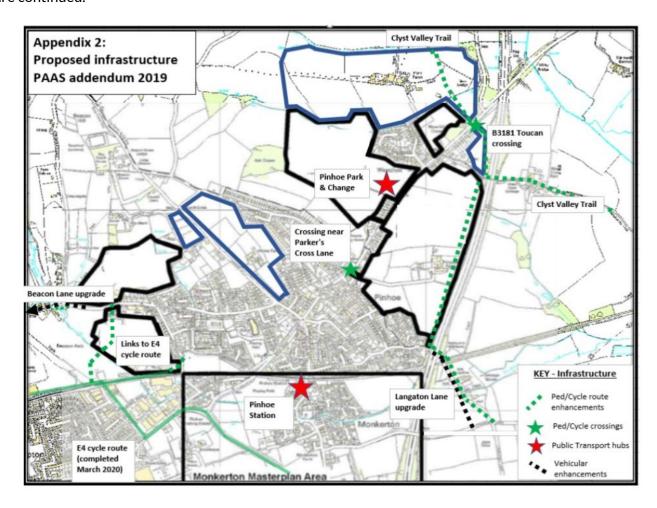


Figure 1 Proposed route of the Langaton Lane Link cycle route (green dotted line alongside M5 motorway)

The PAAS Addendum 2019 notes that there remains a funding gap for the LLL. The cycling and walking portion of the LLL must be constructed as a priority for ensuring the sustainability of the development and to ensure that private car use is not baked into this development. Thus, this proposal must be subject to a funding contribution to the LLL and a Grampian condition to complete the LLL prior to occupation of the residences.

Exeter Cycling Campaign welcomes the following proposal:



"CYCLE FACILITIES New cycle routes are proposed within Phase 2B, north-south adjacent to the Major Access Road. These link through to the routes within Phase 1, 2A and the wider cycle route network. Shared surfaces and the carriageway also provide opportunities for cyclists to traverse the development and access the defined cycle routes. Each dwelling will have opportunities for cycle storage - either in private garages or sheds located within rear gardens."

Again, this section and the associated diagrams do not show or describe any links with the LLL. A "primary cycle way crossing the B3181" is described and several parts of the design and access statement state "3.5m wide cycle way providing direct link through to the approved Linear Park in the east and dwellings in other phases" but diagrams do not show these adjoining the linear park or the LLL (Figure 2). Due to the location of Pinn Court Farm and its listed buildings it is not clear how this phase will connect directly or safely into these vital cycling and walking links. All of this suggests that there is a high risk that plans are not joined up and may result in a disjointed network for bicycle users.



b)



Figure 2 Diagrams from the design and access statement of the proposed cycle way crossing the B3181 (a) and cycleways within the proposed development (b) do not actually show these features joining to the linear park, or to the vital LLL

Regarding the suggested PARKERS CROSS LANE ROUTE, the proposal states:



"The Phase 2B redline boundary extends south to link in to Parkers Cross Lane (see below plan detail). Whilst this link runs through the as yet undeveloped future phases, the conditions of the outline permission state that this link must be in place by the 150th dwelling occupation. As this will occur in the completion of Phase 2B, this suggested route has been suggested to provide pedestrian, cycle and vehicular access for emergency vehicles only."

Exeter Cycling Campaign welcomes this addition. However, the plans note that there is especially steep terrain in the South West of the proposed site. The proposed Parkers Cross Lane route contains gradients in excess of 7% (Figure 3) (with the potential to reach 10% depending on the exact routing). This far exceeds best practice of ensuring gradients are less than 5%. Excess gradients disproportionately discriminate against users with disabilities, women (especially parents) and older people. For this route to be suitable for cycling it must be developed to ensure that it is accessible for all users which means designing to minimise gradients.

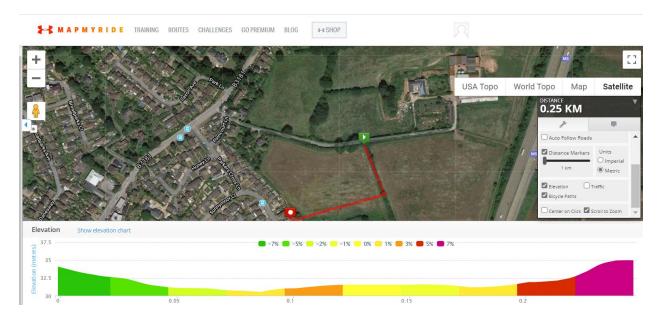


Figure 3: Approximate gradient of proposed Parkers Cross Road route showing at least 7% gradient in both directions

Regarding road design, the diagram of what the main access road design means shows a car on the shared surface with bicycle users on the carriageway (Figure 4). Exeter Cycling Campaign is therefore duly concerned as to what the intended use of the shared surface is and concerned that it may also include parking, particularly as it states "Street parking on one or both sides"



Figure 4: Major access road design from the Design and Access statement



It is possible that this is a mistake/misunderstanding and if so, the inclusion of a 3m verge buffer from the carriageway is welcomed. If this is not a mistake however, then Exeter Cycling Campaign must object to this design. Street parking must be physically separated from any shared use path to ensure there is no possibility of conflict between vehicles and bicycle users and particularly that there is no inclusion of a dangerous "door zone" on the shared path (where parking is alongside a cycle path and as a result there is the danger of a bicycle user colliding with a car door when opened – Figure 5)



Figure 5: The Door Zone

Regarding the design of the LLL, the design code on street hierarchy – major access road states

"Langaton Lane link also utilises these elements".

Exeter Cycling Campaign asserts that as a link road, the LLL should not include any on street parking. The cycleway should be prioritised with no or minimal driveway and/or junction crossings. The design or whole route of the LLL is not included in any of the diagrams in this proposal, therefore Exeter Cycling Campaign cannot currently be assured if it is being designed in a way which is suitable for cycling or linked in to suitable routes at both ends.

Exeter Cycling Campaign notes that where the major access road is not proposed, shared surface access ways are proposed for many of the properties (Figure 6). This design code appears to suggest there is no separate footway. Despite the proposition that "meandering streets will reduce speed" this is of great concern for the safety of pedestrians, particularly children,

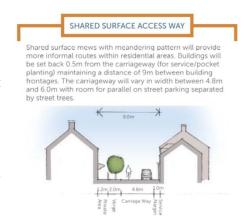


Figure 6 shared surface access way design from the design and access statement

Additionally, it directly conflicts with the proposition that

"The form of the internal development is designed to conform to the latest design philosophy, which creates a pedestrian first environment, and puts this foremost in the minds of residents as they leave their front doors."

Exeter Cycling Campaign asserts that inclusion of on street parking rather than a footway is against the principles of a "pedestrian first environment" and demonstrates that this proposal is inherently car centric and must be opposed and modified.

Finally, Exeter Cycling Campaign welcomes the following proposal:



"CYCLE FACILITIES... In order for residents to cycle to the local store and shop, cycle hoops for secure locking of bicycles will be provided, visible from the public highway."

It is not clear, however, how many cycle hoops will be provided. Therefore, more information is required to assess whether this will be sufficient. Additionally, they should be positioned at least as close to the entrance ways as the nearest car parking to indicate bicycle users are provided for as a priority and be designed to enable non-standard cycles to be parked (e.g. trikes, recumbent, trailers) to ensure full accessibility and no discrimination.

Conclusion

Exeter Cycling Campaign welcomes a number of mentions of cycling (and walking) considerations in this proposal, however the proposals fall short of what is required in a number of areas and on this basis the Exeter Cycling Campaign objects.

If the proposal is redesigned to address the following points then the Campaign would remove its objection to this proposal:

- 1) It is crucial that funding must be included for the Langaton Lane Link with a Grampian Condition to complete the cycle way of the LLL prior to completion and/or occupation of the residences.
- 2) All new cycle routes should provide a continuous route, with safe priority at junctions over motor vehicles. Cycle routes should connect the main access route to the B3181, the shops and the linear park and Langaton Lane Link (via other phases if necessary).
- 3) The Parkers Cross Road route design must meet best practice standards including a minimum width of 3m and minimising gradients to under 5% wherever possible.
- 4) The major access road design should be modified to ensure there is no sharing between vehicles and bicycle users and there must be no generation of a dangerous "door zone" alongside the shared path.
- 5) Shared surface access ways should be re-designed to include a footway, at the minimum on one side of the road, ideally on both.
- 6) Cycle parking at the shop should be clarified. Provision must be numerous enough and convenient enough ensure the private car is not the default method of transport. Cycle parking must be designed to accommodate non-standard cycles as well as standard cycles (e.g. trikes, recumbent, trailers) to ensure full accessibility and no discrimination.

Yours sincerely
Helen Mako-Yule for and on behalf of:
EXETER CYCLING CAMPAIGN

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