



21/00072/MARM | Reserved Matters for the erection of up to 105 dwellings, associated landscaping, public open space and allotments together with vehicle and pedestrian access from Siskin Chase and pedestrian access from Colebrooke Lane, following Outline approval 19/01839/MOUT | Land at NGR 301216 106714 (West Of Siskin Chase) Colebrooke Lane Cullompton Devon

18th February 2021

Dear Mid-Devon District Council Planning Team

I am writing to you on behalf of the Exeter Cycling Campaign as their Mid and East Devon representative.

Exeter Cycling Campaign objects to the proposal as it stands on the 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 and air quality, which are already a documented problem in Cullompton.

The MDDC Local Plan Adopted Policies (July 2020) - Policy CU21 states "*f) Transport assessment and implementation of travel plans and other measures to minimise carbon footprint and air quality impacts.*" Devon County Council is a signatory to the Devon Climate Declaration, supporting action on the Climate Emergency. Devon County Council also spawned the Devon Climate Emergency Project: Creating a resilient, net-zero carbon Devon – where people and nature thrive.

Cullompton is a growing part of Devon with existing and planned schemes providing much of the new housing required in local plans. Unfortunately this proposal is demonstrably car centric, does not provide a travel plan (a requirement stated in the appeal decision of the outline application) and relies on the adoption of electric vehicles only as a means to reduce carbon footprint and air quality. It is important to note that electric vehicles only partially mitigate air quality. Thus, this proposal does not meet DCC and MDDC's publicised policies and aims and should be rejected until it is redesigned to enable walking and cycling for all to be the natural choice over private car use.

I will now address a number of specific issues.

Exeter Cycling Campaign notes the welcome addition since the outline application (19/00118/MOUT) of a permanent cycle way to the South of the site following the conclusion of construction. However, we have a number of concerns regarding this link:

- The appeal decision states regarding the construction access to the South "*In the interests of pedestrian and cycle linkage/use and to allow emergency access, it would be necessary to ensure that this link is retained thereafter for such purposes.*" However, this application reference refers only to "*pedestrian access from Colebrooke Lane*". Please can you provide assurance that this is a mistake and there is no possibility that the cycle link may be removed at a later date?
- Given the current documentation we cannot yet be assured that the design of this cycleway meets the standards clearly outlined in LTN 1/20 (<https://www.gov.uk/government/publications/cycle-infrastructure-design-ltn-120>) including gradient, angle of any bends, surface material (must be suitable in all weathers) and width, particularly if expecting to be shared with pedestrians. LTN 1/20 states "*Designers should consider comfort for all users including children, families, older and disabled people using three or four-wheeled cycles. Families are more likely to use off-carriageway facilities. Young children may need additional space to wobble or for an accompanying parent to ride alongside*". Serious consideration should be given to separating people cycling from people walking due to the incompatibility particularly



where dogs are concerned and it must also be clear that dogs must remain on leads if they have access to the cycleway.

- Particular attention is needed at the access point with Colebrook lane. In some of the documents provided a staggered gate is indicated at the Colebrook lane end. This design is discriminatory against those with non-standard cycles, particularly families and disabled users and should be removed from the plans. We would also like assurance that this part of the design fully passes the Junction Assessment Tool from LTN 1/20. The remainder of Colebrook Lane entering into the rest of Cullompton must also meet LTN 1/20 design principles.
- As this is currently the only cycle route planned in and out of the development we are also concerned that there is insufficient mitigation to prevent flooding in this area. Flood mitigations must treat this route as a priority to ensure cycling is not unduly prevented and keep the emergency access open at all times.

If these issues are clarified/remedied we could support this part of the proposal as a positive addition to the area.

However, when considering sustainable travel methods it is not sufficient to merely look within the development. Consideration must be given, as it is for vehicular travel, to the locations people need to travel to.

The layout principles state *"The close proximity of the site to the existing town centre and local facilities of Cullompton, key local education and community facilities will encourage travel via sustainable transport modes."* Exeter Cycling Campaign asserts that the design as it stands is insufficient to meet this principle. It is not sufficient to merely "encourage" cycling and walking. 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 such as home to school, work and shops.

The design statement states *"There are a number of walking and cycling routes available between the site and the town centre"* however only goes on to list the walking routes. Exeter Cycle Campaign assert that this is because this statement is manifestly untrue – there are no cycling routes in Cullompton. This is highlighted by the following point which states *"The nearest National Cycle Route (NCR) to the site is NCR 3 located circa 10.2km (approximately a 34 minute cycle ride) from the site. The route connects Land's End to Bristol via St Austell, Bude, Barnstaple, Tiverton, Taunton and Wells."* This clearly demonstrates the lack of cycling route provision in Cullompton and throughout Mid-Devon.

It goes on to state *"there are however, a number of lightly trafficked residential roads attractive for cyclists providing access to Cullompton town centre and the main retail and employment areas within the town."* Exeter Cycling Campaign disputes this statement in the strongest terms. Cyclestreets.net assesses the roads through Cullompton as "Very hostile" due to the volumes of car traffic and the current layout of roads including parking. There are no direct and connected routes to the amenities of Cullompton on lightly trafficked roads as many of the residential areas in the vicinity are cul de sacs and dead ends.

The access and movement plan further states: *"Cycle use is encouraged through the high degree of permeability within the layout. With the town centre located nearby and traffic movements low within the development, due to dwelling numbers, cyclists will therefore find it safe and convenient to use the streets for cycling."* As mentioned clearly above this is inaccurate and disingenuous as there is no safe and convenient route to the places people need to travel to, including the stated town centre.

Exeter Cycling Campaign recognise that it is unreasonable to expect the lack of routes in Cullompton as a whole (or Mid-Devon) to be remedied through this planning application, however we kindly request that planners be fully held to account when making statements regarding apparent cycling provision that are manifestly not true and that these untrue statements are disregarded when making planning decisions. It is particularly disingenuous that the imagery used in the design and access statement shows plenty of walking and cycling and very little car use.



With the housing area all in the North of the development area, it is not encouraging that the only cycle way is to the South, resulting in those using bicycles having to detour further than those driving. The local facilities plan demonstrates, the majority of amenities in Cullompton are not within particularly easy walking distance but are, however, within easy cycling distance. These include:

Amenity	Distance via Siskin Chase then direct (car route)	Distance via Colebrook Lane then direct (cycle route using "very hostile" roads)	Distance via Colebrook Lane then "lightly trafficked residential roads" (cycle route avoiding "very hostile" roads as far as possible)
Centre of high street (Cullompton Town Council)	0.85 miles	0.92 miles	1.08 miles (only possible as far as Shortlands Lane then uses main road)
Secondary school (Cullompton Community College)	0.55 miles	0.61 miles	Not possible
Tesco Supermarket	1.19 miles	1.26 miles	1.46 miles (only possible as far as St Andrews Road then uses main road/B3181)
Doctor's surgery	1.41 miles	1.46 miles	1.71 miles (only possible as far as St Andrews Road then uses main road/B3181)

Whilst these detours may not look much in isolation, they add up to a car centric development which will embed the default transport method as the private car. Since the design access statement notes *additional "Links to the west and north are not possible due to land ownerships"*, Exeter Cycling Campaign asserts that in addition to the Southern link, the "secondary" pedestrian only access to the North of the site should be re-designed to allow pedestrian and cycle use. This would need to be re-designed in line with LTN 1/20. Suitable provision for pedestrian access alongside vehicular access on Siskin Chase appears to have been provided. However, with pavement widths of 2.0m in the site and 1.8m on Siskin Chase this is not suitable for shared use, emphasising the need to re-design the link to the North. This would be particularly important for families and children as it would link them to the existing recreational facilities – in tandem, suitable cycle parking should also be added to the Siskin Chase play area.

Regarding parking plans, Exeter Cycling Campaign considers the level of parking provided as excessive for 105 houses: *"Overall the scheme provides for a total; pf 246 no. parking spaces, including 198 allocated spaces, 31 garages and 21 visitor spaces."*

This adds to the weight of evidence of the car centric nature of the proposal. Whilst we recognise the need for parking the aim of new developments should be to reduce private car use, not support and encourage the extremely high levels currently seen. Thus, the minimum allocated spaces should be changed to maximum allocations and for a 2 and 4 bed house should each be reduced by 1 car. Serious consideration should also be given to providing an electric car sharing facility, such as has been done with Co-Cars in Cranbrook, to enable a lower level of private car ownership.

Exeter Cycling Campaign welcomes the commitment to providing secure cycle parking for every property and note that the numbers provided are in excess of the car parking amounts, which is entirely appropriate. *"Secure cycle parking will be provided within the curtilage for each property, either within garages, or in sheds located within back gardens for units without garages."* In order to support this aspect, we need assurance that all secure cycle storage has been designed to a suitable size for non-standard cycles including bike trailers, cargo bikes and



modified cycles for disabilities. Furthermore, for those where the secure storage provided is in sheds, that the back garden is accessible for accommodating non-standard cycles. This includes ensuring pathways to rear gates are not too thin and do not include bends that are too tight such as right angles. Examples of the dimensions and turning circles of standard and non-standard cycles can be found in LTN 1/20.

Finally - we note that the appeal decision for 19/00118/MOUT stated that a Travel Plan must be provided, this does not appear to have been given. Additionally, the Access and Movement plan also appears to be lacking some detail as it states "*presented opposite*" but nothing additional is presented. In the absence of these plans we conclude that there are insufficient sustainable travel measures within this plan to meet DCC and MDDC's commitments to air quality and CO2 emissions.

Conclusion

Exeter Cycling campaign welcomes that some consideration has been given to cycling links in this proposal. However, given the above points, this application should be rejected as it stands and/or have conditions placed upon its approval ensuring the measures outlined in our objection are addressed. To summarise, these are:

- Assurance that Southern cycle and pedestrian link will not be reduced to only a pedestrian link.
- Southern cycle and pedestrian link design assessed in detail in line with LTN 1/20 design principles with Junction Assessment undertaken and the whole link redesigned if necessary.
- Consideration to leveraging a condition and/or funding to upgrade links for people cycling to the main amenities of Cullompton to help create the safe routes that the design and access statement claims exist.
- Northern "pedestrian" link re-designed to provide a cycle and pedestrian link in line with LTN 1/20 design principles.
- Car parking provision reduced with consideration to providing an electric car sharing facility within the development.
- Cycle storage and access to cycle storage assessed including in line with LTN 1/20 design principles to ensure no residents are unable to take advantage of this benefit.

If the proposal is clarified and modified where needed to address these points then then the Campaign would remove its objection to this proposal.

Yours sincerely

Helen Mako-Yule for and on behalf of:

EXETER CYCLING CAMPAIGN

exetercyclingcampaign.org.uk | Twitter: @ExeterCycling | Facebook: ExeterCyclingCampaign