



02 September 2021

By Email to: planningcranbrook@eastdevon.gov.uk

Dear Sir/Madam,

Planning Application 21/2033/MRES | Approval of the reserved matters of access, appearance, landscaping, layout and scale for retail uses comprising a supermarket and Cranbrook town square, with associated engineering works, infrastructure, car parking and landscaping.

I am writing on behalf of the Exeter Cycling Campaign in respect to the above planning application. We object to the application and believe that it should be refused for the reasons set out in this letter.

In principle we believe that the proposals do not provide cycling facilities that reflect the commitments made by the Developers at the outline planning stage and are not consistent with the East Devon Local Plan policies or the The Cranbrook Plan Development Plan Document (draft). We are disappointed by the quality of design which has not properly integrated cycling into the design and fails to meet the good practice set out in Local Transport Note 1/20 Cycle Infrastructure Design (LTN 1/20) or its predecessor documents.

Cycling within the Cranbrook Planning Process

Before commenting specifically on the proposals we would like to review previous commitments made by the Developers at the outline planning stage. We will also briefly examine the specific plans developed by East Devon District Council as Planning Authority for Cranbrook. We will then measure the proposed development against this local planning policy and commitments made by the Developers at the outline planning stage for this site.

A key document submitted by the Developers as part of their approved Outline Planning Application was the **Cranbrook Design Guide**. In this document the Developers identify and commit to the following role for cycling within Cranbrook:

"The network of routes and the design of the environment will be on a human scale and should instead dilute car movements giving pedestrians and cyclist freedom to access all areas of the public realm with relative ease." p31, Urban Design Principles - Permeability.

"It is intended that pedestrian and cycle movement and public transport should take precedence, based upon a permeable network of streets.." p.32, Urban Design Principles - Pedestrian and Cycle Movement.

"Cycle and pedestrian movement should be rendered possible along the most direct route to local facilities even if the car driver find the route more difficult." p.32, Urban Design Principles - Pedestrian and Cycle Movement.

The **East Devon Local Plan (2013 - 2031)** Strategy 11, Integrated Transport and Infrastructure Provision at East Devon's West End, highlights the priority given to cycling within Cranbrook:

"We will promote high quality and integrated transport provision at East Devon's West End where, working with partner organisations, we will secure a provision based on a hierarchy of;

- 1. Walking*
- 2. Cycling*
- 3. Frequent and high quality Public Transport provision (given priority over other road users)*
- 4. Private motor vehicles.*

Though transport solutions will take into account site specific needs of a development to secure the most suitable form of sustainable transport provision..."

Most recently **The Cranbrook Plan Development Plan Document** (draft) includes the following policy; for brevity we have only included the relevant part of the policy.

"CB1 Health and Wellbeing at Cranbrook

To maintain and improve the good health and wellbeing of individuals and the community as a whole at Cranbrook, development proposals must:

...

- 4. Ensure that locations of services and land uses in Cranbrook integrate well with the community and are within easy reach on foot and bicycle wherever possible;*
- 5. Create well designed streets and spaces using the Healthy Streets Approach to encourage walking, cycling and social activity; ..."*

Cycle Routes

Permeability of site to cycles

We are concerned about the level of permeability of the proposed development for cycles. This is particularly disappointing given that the site is a greenfield site, effectively a blank sheet of paper where it should have been possible to accommodate changes in level through spatial arrangement of the different elements of the site.

Reason for objection: The difference in level between the Town Square and the Supermarket block permeability to people using bicycles and the proposed mitigations (including the proposed lift) are inadequate, particularly to those with disabilities or those using non standard cycles/ cycle trailers. This is in direct contradiction of previous commitments for permeable and direct cycle routes.

The principal concern with regards to permeability for cycles is how the change in level between the Town Square and the Supermarket has been dealt with. We feel that the measures proposed to mitigate this change in levels are inadequate when measured against the local planning policy and commitments previously made by the Developers when outline planning permission was gained. The Developers might have mitigated against the problem by developing the overall site on 3 instead of 2 levels or by leaving space for a proper inclusive ramp in addition to stairs.

Within the planning application the lift is highlighted as a method of mitigating the access between Town Square and Supermarket: *"Both within [The Square] will physically and visually connect the supermarket with the high street via the central stairs and a lift ensuring permeability through the town centre and ease of access to Morrisons by pedestrian, cycle and bus."* (para 2.24, Planning Support Statement).

Unfortunately very few details are given with regard to the lift; hours of operation, who will be paying to run and maintain the lift or internal dimensions are not explicitly described within the application. However, scaling from drawing 18303-SGP- B04- 00-DR-A-131101, submitted as part of application 21/2020 internal dimensions of 1.4m x 1.6m. As such the lift would be entirely

inadequate for cycle provision (as suggested within the Planning Support Statement) as this is not sufficient for an adult bicycle, let alone one with a trailer, a cargo bike or adapted cycle

Therefore to move a cycle between the Town Square and the Supermarket (which might be necessary when shopping) requires an approximately 160m detour via Court Royal. This would also be the case for wheelchair users in the event that the proposed lift is unavailable for any reason.

It is noted that illustrations of the proposed steps between the Town Square and Supermarket suggest the provision of a wheeling ramp. It should be noted that LTN 1/20 (10.8.25, 10.8.26) states that “[wheeling ramps] are not inclusive; they do not cater for non-standard cycles and are inaccessible to many people. They will therefore only form part of an inclusive system if an alternative facility is provided which will cater for all users” As identified above the proposed lift could not form an alternative facility as it is too small for even a standard cycle.

Reason for objection: The use of chicane barriers on shared pedestrian/ cycle route into the site shown on some drawings submitted – these may exclude people riding non-standard cycles or cargo bikes. These barriers are not appropriate for new build schemes and should not be used.

The drawing 10013-FPCR-STS-ZZ-DR-L-0003, Hardworks Layout, Sheet 2 of 2 suggests the use of chicane barriers on the shared path to the supermarket running along the north boundary of the nursery. LTN1/20 specifically prohibits the use of such barriers stating “Schemes should not be designed in such a way that access controls, obstructions and barriers are even necessary...” (LTN 1/20 p.12 principle 12).

Reason for objection: There are no details given of signage on the shared use paths into the supermarket site. We believe that clear signage (in this case as a shared use path) is important to make people aware that the facilities exist (encouraging cycling) and to help reduce conflicts between users.

Interaction with existing cycle routes

Reason for objection: The entrance to the supermarket car park from Court Royal does not reflect good practice design, or make any allowance for the shared pedestrian and cycle footway running along Court Royal. In its current form it exposes people walking and cycling to greater risk than is necessary.

In common with other principal streets in Cranbrook, the footways along Court Royal are designated as shared facilities for walking and cycling; the proposed scheme does not appear to have properly considered how users walking and cycling along Court Royal will cross the entrance to the car park.

The proposed kerb radii on this entrance are excessively large even for the largest delivery vehicles for the supermarket. The Service Management Plan submitted as part of the planning application contains a swept path analysis in Appendix B. Examination of the swept path analysis shows that the swept path of the largest truck does not require the size of entrance proposed. Large kerb radii encourage and allow higher speeds for smaller vehicles using the entrance, which are a hazard to users of the footway on Court Royal.

The entrance does not represent best practice with regards to vehicle/ path user priority. LTN 1/20 states “In urban areas, where protected space separate from the carriageway is provided for cycling, it is

important to design priority junctions so that wherever possible cyclists can cross the minor arms of junctions in a safe manner without losing priority. This enables cyclists to maintain momentum safely, meeting the core design outcomes of safety, directness and comfort.” LTN 1/20 10.5.7.

An arrangement that gives people walking and cycling clear priority across the entrance should be used (as described in LTN 1/20 10.5.7 to 10.5.34). This also reflects the commitments made by the Developers’ in the Cranbrook Design Guide at the outline planning stage that pedestrian and cycle movements should be direct and take precedence over private motor vehicles. This arrangement has been successfully used on the E4 cycle route in Exhibition Way, Exeter, Pinhoe as illustrated in Figure 1 below.



Figure 1 - Pedestrian and Cycle Priority Crossing of side road, junction of Exhibition Way and Pinbrook Road, Exeter.

Reason for objection: We are concerned that vehicle parking bays on Court Royal shown on some drawings submitted may restrict intervisibility between cyclists using the path along the east side of Court Royal and motor vehicles entering the Supermarket Car Park.

We are concerned about intervisibility between vehicles turning into the car park from Court Royal and pedestrians/ cyclists using the shared pedestrian/ cycle footway on the east side of Court Royal. This concern relates principally to the provision of parking bays along the east side of Court Royal. Unfortunately there is inconsistency between the different drawings submitted by the Developer, however drawing 18-303 SGP ZZ 00 DR A 130011 “Site Plan RM1 Proposed Composite Coloured Plan” suggests that parking bays are being provided close to the Car Park entrance. We are concerned that vans or other large vehicles parked in these bays would reduce visibility between path users and vehicle drivers entering the car park and reduce the level of safety for path users.

Cycle Route Design

Reason for objection: Lighting Columns have been placed within the Shared Use Paths within supermarket site reducing their effective usable width below the minimum acceptable standard.

Shared Pedestrian/ Cycle Path access within the Supermarket site are 3.0m wide - the minimum possible width acceptable for a new build development on a greenfield site. However lighting columns have been placed within this width reducing the effective width of the path below the minimum acceptable especially given this is a greenfield site. Lighting columns should be placed within the path (LTN 1/20 13.1.4) but placed 0.5m clear of the edge of the path. Alternatively the width of the shared use paths should be increased to accommodate the lighting columns, plus a 0.5m clearance, plus 3.0m minimum width.

Reason for objection: No visibility splays have been provided on Shared Use Paths - both where they enter/ leave supermarket site and where they enter the circulation area outside the supermarket entrance. The proposed planting shows hedgerows running right up to the edge of the site blocking visibility which would cause potential for conflict and collision between pedestrians, cyclists and vehicles.

The shared pedestrian and cycle paths between the Supermarket entrance and both Court Royal and the Nursery Access Road should be provided with proper visibility splays for cycling (as per LTN 1/20 5.8) both where they exit the supermarket site and where they enter the circulation area outside the supermarket entrance.

Cycle Parking

Cycle Parking Planning Developer Commitments and Local Requirements

Throughout the planning process for Cranbrook, cycling parking has repeatedly been identified as an important feature, both by East Devon District Council and the Developers.

Within the **Cranbrook Strategic Design Guidance** the Developers committed to *"The provision of appropriate facilities for cycle storage is an important means of fostering cycle use in the town. Covered cycle storage facilities will be provided at schools, the Town Centre and the train station. Provision will also be made at local centres for cycle storage in their individual schemes.."* p.93, Strategic Design of Cranbrook - Strategic Design Details - 12 Cycle Parking

Within **The Cranbrook Plan Development Plan Document** (draft) the Parking at Cranbrook policy (CB21) developed the cycle parking standards further stating that:

"Bicycle parking must be provided in all future developments at Cranbrook so that it is:

- 1. Conveniently sited to the property or use it serves;*
- 2. Accessible and easy to use;*
- 3. Safe and secure; and*
- 4. Covered. ...*

... All destinations that will attract regular visitors, including the town centre and facilities within it and employment facilities, will need to have dedicated safe, secure and covered cycle parking provision of a scale appropriate to the use and location."

Therefore our expectation is that cycle parking should meet these commitments.

Location and scale of Cycle Parking

Reason for objection: The total number of cycle parking spaces is lower than national guidance (27 provided compared to 29 recommended minimum). Only 12 spaces are under cover whereas previous commitments from the Developers and East Devon Planning Requirements state that all town centre cycle parking should be covered.

East Devon has no specific standards for Cycle Parking for retail developments and therefore we will make reference to national standards. The latest guidance from Department for Transport is LTN 1/20 which sets suggested minimum levels of cycle parking, based on floor space for different types of development.

Large Retail - Supermarket Floor space = 2285m²

Short term parking 1 per 250m² = 9 spaces

Long term parking 1 per 500m² = 4 spaces

Small Retail - High Street Shops = 870m²

Short term parking 1 per 100m² = 8 spaces

Long term parking 1 per 100m² = 8 spaces

Total minimum recommended short term = 17 spaces.

Total minimum recommended long term = 12 spaces

Total proposed in application = 12 space covered, 12 spaces uncovered, 3 staff (spaces or stands - unclear from application) secure and covered.

Whilst we have made reference to minimum requirements for the number of cycle parking spaces, we believe that there is a case to be made for more ambitious levels of cycle parking provision.

The report Value of Cycling commissioned by the Department for Transport in 2016 highlights some of the benefits of providing cycle parking. It states local economic benefits including:

- Cyclists visit local shops more regularly, spending more than users of most other modes of transport.
- Per square metre, cycle parking delivers 5 times higher retail spend than the same area of car parking
- A compact town optimised for walking and cycling can have a “retail density” (spend per square metre) 2.5 times higher than a typical urban centre.
- Public realm improvements, including those that cater for cycling, have been shown to result in increased trade at local businesses; up to 49% in New York City..

A firm commitment to review the usage of cycle parking on a regular basis (say 2 or 3 yearly) could be a solution; along with a firm commitment to then turn standard vehicle bays closest to the Supermarket to cycle bays (with direct access from the shared pedestrian/ cycle paths) to ensure peak cycle parking demand is met.

We believe that approximately one third of the area of the overall development site for the Supermarket, Town Square, High Street Shops/ Housing and Nursery is allocated to car parking (see figure 2 below). We hope that sufficient space can be found for the minimum recommended and future levels of cycle parking.



Figure 2 - Total Area of Site Allocated to Car Parking (shown red).

We support the provision of cycle parking located at the entrance to the Supermarket – this is a convenient location and will help encourage cycling and is consistent within national guidance given in LTN 1/20.

We also support the provision of secure and covered cycle parking for staff at the supermarket along with the provision of changing facilities and lockers. **We suggest that the provision of a shower and clothes drying facilities for staff would also be of benefit.**

Reason for objection: No specific provision has been made for parking for adapted cycles for disabled people. LTN 1/20 11.3.2 recommends that 5% of total capacity should be co-located with disabled car parking for non-standard cycles to accommodate people with mobility impairments.

Design of Cycle Parking

Reason for objection: There is insufficient information within the planning information submitted relating to the design of the proposed cycle parking. Spacing of cycle stands shown on drawing submitted is 0.8m where LTN 1/20 stipulates a minimum of 1.0m between stands and recommended distance of 1.2m. (see Standards For Public Cycle Parking, Bicycle Association, June 2021).

Kind Regards,

Tim Mills

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On behalf of

EXETER CYCLING CAMPAIGN