

# 22/0142/OUT Land to West of Clyst Road Topsham

Dear Matthew Diamond

Thank you for the opportunity to review the application for the construction of 100 dwellings to the land West of Clyst Road Topsham. [here](#).

The Exeter Cycling Campaign does not object to new housing developments but we will and do object to developments that do not meet national and local policies for enabling active travel.

We find ourselves having to **object** to this application.

Our objection is based on a number of concerns:

1. Lack of connectivity to the site for people travelling by bike
2. Design of the site for people walking and cycling
3. Measures to cycling to the site
4. Cycle storage / parking
5. Design of junctions and streets on the site
6. Apparent lack of ambition or understanding to meet the councils' policies for enabling half of journeys to be done by foot or bike.

## Preamble

Merely stating that a development is 'sustainable' or that a development 'enables cycling and walking' sound hollow or even misleading if the detail of the proposal then does not deliver measures to make this a reality.

We consider some of the statements in this application to be misleading and verging on sophistry. The claims and commitments that this will deliver good cycle connections (DAS 3.2.1), that this is a setting for sustainable and healthy lifestyles (DAS 3.1.1), that 'vehicles [will] not dominate the street' (DAS 4.6.2) are not borne out in the designs for this proposal, we believe.

The Proposal appears to show a shallow understanding of what measures actually enable cycling and walking to be a realistic travel mode of choice - with an over emphasis on soft encouragement measures but little focus on hard, engineering solutions.

The overall impression is that this development site is, as the DCC Highways submission made clear, one where the car will dominate.

Some of the statements that are made in this proposal with which we disagree and are not substantiated in the design, include:

DAS: *"The report identifies no transport related reasons as to why the proposed development should not be granted planning consent"*

DAS: *"A place where it is safe to play, car speeds are low"*

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DAS: “Opportunities for good pedestrian and cycle connections; “

DAS(4.6.2): “4.6.2 “ Parking has been designed so that ... vehicles do not dominate the street scene or public spaces. Parking is provided through a combination of on-plot, **on street** and in small courtyard spaces”

TA (7.3.1) “The proposed development site benefits from good accessibility by all modes of transport and, in particular, by sustainable modes.”

**Overall, we believe this proposal falls short of stipulations in ECC’s Core Plan, the NPPF assumption of sustainability through enabling active travel and do not support the councils’ carbon reduction commitments.**

## Specific Concerns

### Connectivity to the site

There is no permeability of the site nor onward connections for sustainable travel. We support the DCC Highways assessment that there is “*no direct access to the Strategic Cycle Network.*” Furthermore, “*there is no direct connection to the west or south, which is likely to be the most dominant direction to access jobs and services, increasing the journey time by active travel modes.*”

A fundamental principle of the NPPF is sustainability. The designs for this development do not enable, and will prevent future sustainable access.

DCC has a policy commitment to enable 50% of journeys by foot or bike. This proposal undermines this policy with a design that locks in car dominance.

### Design of site for people walking and cycling

There appear to be conflicting statements about how people cycling will access and traverse the site.

The DAS describes a road hierarchy which forces people cycling to access the site along the primary road. There is no alternative foot/cycle way into/out of or through the site. (DAS para 4.5.1 “*A single point of access is proposed from the adjoining development connecting to Clyst Road*” and para 4.5.2 “*The primary street through the approved development to the south will form the primary pedestrian and cycle route from the proposed development to local facilities and amenities.*” However, Figure 3.3 in the TA suggests that perhaps on the E of the site there will be a road restricted to pedestrians and cyclists. This uncertainty needs to be clarified.

Par 4.5.3 of the DAS states that “*shared surface streets where greater priority is given to pedestrians and car speeds are consequently lower.*” It is unclear what the design proposal is here. What we are clear though is that ‘shared surface streets’ do not slow traffic. They merely intimidate vulnerable street users off the highway.

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As it stands, this design falls short of the ECC Core Strategy (2012) which requires “*that the design and layout of new development encourages access on foot and by bike*”.

It also falls short of NPPF para 108 which insists: “*In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that.....safe and suitable access to the site can be achieved for all users*”

### Measures to enable cycling

The Framework Transport Plan's (FTP) aims are to “*Raise awareness*” of different travel modes and “*encourage the use*” of sustainable travel modes. It states that this must be done using both hard and soft measures but then describes only soft measures. Any cursory analysis of what is effective in shifting people onto active travel modes shows that ‘encouragement’ has little effect. What is effective in driving transport mode choices is the costs (financial, time and safety) of each travel mode. Unless it is made safer, cheaper and more convenient to choose active travel modes then people do not choose them.

The FTP's action plan contains almost entirely soft measures, which will have limited effect in delivering the stated aim of ensuring active travel modes are adopted.

### The case for a walking/cycle connection over the railway remains

DCC Highways have previously articulated “*concerns with the sustainability of this site and how the development will help meet targets for modal shift and carbon reduction*” and concluded that the developer should make a contribution to a new pedestrian/cycle bridge over the railway line. This would provide the true connectivity of these active modes into employment and retail sites to the west of the railway. Without this, journey distances for pedestrians and cyclists are lengthy.

The transport assessment notes that (3.5.1) “*during the site visit... Clyst Road is well used by pedestrians and cyclists*”. However, this application makes no proposals to design in safety for these existing users, and will, with the increase in traffic, make this worse.

The Highway Authority has previously sought agreement on a financial contribution to deliver this pedestrian / cycle connection across the railway line. We note with regret that “*the Highway Authority is withdrawing the £4,000 per dwelling contribution towards sustainable infrastructure which was requested previously*”. It appears to our reading that DCC has withdrawn the request for this contribution **not** for reasons that the Authority believes this request to no longer be inappropriate but only because of the financial risk posed to the Authority by the Developer's application going to Appeal.

We continue to support the case (which has not been undermined) for a safe pedestrian / cycle bridge over the railway.

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### Cycle parking / storage

The proposal states that the design will make “*Provision of cycle parking complying with the requirements of ECC*”. Furthermore, that there will be (DAS 4.10.2) “*Well integrated car and bicycle parking provision*”. We can see no detail in the proposal which substantiates these statements and will expect to see designs to deliver this in the reserved matters.

Given the councils’ subsequent climate change declarations, commitments to deliver 50% of journeys by walking/cycling and the establishment of LTN 1/20 design standard we would expect to see:

- The developer seeking to exceed the minimum cycle parking numbers
- Ensuring cycle parking design meets LTN 1/20 standards and accommodate all bike forms
- Cycle sheds in dwellings to be easily accessible and ideally at the front of properties. Sheds for bikes tucked away in back gardens is not acceptable.

We shall scrutinise the reserved matters designs to ensure these criteria are met.

### Design of junctions and streets

The DAS seems to suggest that safe access for people walking and cycling can be provided merely with dropped kerbs and tactile paving. (3.3.5) “*Dropped kerbs and tactile paving are proposed to provide safe access for all*”. There are now design standards for how junctions should be designed to provide safety for people walking and cycling. These involve more than mere dropped kerbs and should include side-road priority, different surfaces and level crossings where cars have to give way. The Campaign will be scrutinising the reserves matters design proposals to ensure this is the case.

We acknowledge that our response to this application has been very critical. We are disappointed that developments that make so little effort to really enable active travel are still being submitted. We hope this application, if ever approved, will be significantly amended before consent is given.

Yours sincerely

Mike

Mike Walton

for and on behalf of:

EXETER CYCLING CAMPAIGN